

Handwritten purple scribbles and a diagonal line.

Red checkmark.



Response and Objections Raised Against the Stag Brewery Planning Applications

Applications covered by this response:

- Ref 18/0547/FUL for the detailed development to the East of Ship Lane and outline development to the West of Ship Lane
- Ref 18/0548/FUL for the secondary school and Playing Fields
- Ref 18/0549/FUL for the alterations to Chalker's Corner and the removal of an area which currently forms part of Chertsey Court.

Prepared and Reviewed by the Mortlake Brewery Community Group and Harwood Savin Ltd.

13th May 2018

This page has been left blank

Chapter 1 – Introduction and Executive Summary

This is an overview of the Mortlake Brewery Community Group's response to the three planning applications submitted outlining the redevelopment of the Stag Brewery:

- Ref 18/0547/FUL for the detailed development to the East of Ship Lane and outline development to the West of Ship Lane
- Ref 18/0548/FUL for the secondary school and Playing Fields
- Ref 18/0549/FUL for the alterations to Chalker's Corner and the removal of an area which currently forms part of Chertsey Court.

It comprises the following sections:

Section	Applicable to Ref 18/0547/FUL	Applicable to Ref 18/0548/FUL	Applicable to Ref 18/0549/FUL	Page
Chapter 1 – Introduction and Executive Summary	n/a	n/a	n/a	2
Chapter 2 – Background	Yes	Yes	Yes	9
Chapter 3 – Policy Basis for Objection	Yes	Yes	Yes	12
Chapter 4 - Development Proposal and Design	Yes	Yes	No	21
Chapter 5 – Transport	Yes	Yes	Yes	31
Chapter 6 - Green Spaces	Yes	Yes	Yes	41
Chapter 7 – Education	No	Yes	No	67
Chapter 8 – Affordable Housing	Yes	No	No	80
Chapter 9 – Community Space	Yes	No	No	82
Chapter 10 – Environmental Impact Assessment	Yes	Yes	Yes	85
Chapter 11 – Other Procedural Matters	Yes	Yes	Yes	106
Chapter 12 - Conclusion	Yes	Yes	Yes	109

The following Appendices support this document.

Appendix	Page
Chapter 5 Transport Appendix 1 - MBCG's Manual and Video Surveys	113
Chapter 5 Transport Appendix 2 - MBCG's Forecast of Travel Demand due to the Development	115
Chapter 5 Transport Appendix 3 -Issues to do with the Sheen lane Level Crossing	116
Chapter 5 Transport Appendix 4 - Further Technical Comments	119
Chapter 5 Transport Appendix 5 - MBCG's Letter to local MP Zac Goldsmith	122
Chapter 7 Education Appendix 1 - Glossary	125

Executive Summary - MBCG Response to Stag Brewery Planning Applications

The Mortlake Brewery Community Group (MBCG) is an umbrella group of residents and representatives of local organisations with a common interest in ensuring that the redevelopment of the brewery site provides a new village heart for Mortlake with buildings and public spaces of the highest quality. This response has been prepared by the MBCG and many experts in various planning related professions and in conjunction with the planning consultants Harwood Savin Ltd. (Refer to Chapter 2 for more details).

In reviewing the planning applications, we refer to a number of planning policies and documents including the 2011 Planning Brief. (Refer to Chapter 3 for more details).

Overview

The MBCG is supportive of re-development of the Stag site and sees regeneration as an opportunity to put the village heart back into Mortlake and assist in meeting both local housing needs and contribute to London's wider housing mix and needs.

While we acknowledge there are positives aspects of the design (opens up the site, provides a green link, helps to address the local housing needs), there remain very significant areas of concern which, if not addressed, will have a detrimental impact on the existing and new residents and to which we formally object:

- The cumulative density of the site is overwhelming and overbearing
- The local infrastructure cannot accommodate the increase in traffic
- There is no strategy for improving the public transportation to help alleviate the situation and importantly, no plan to address the issues of the level-crossing
- Loss of protected sports fields and inadequate protection and/or re-provision of the OOLTI – land on the Brewery site and at Chertsey Court
- The level of affordable housing is below the targets set by the mayor and Richmond Council
- There is no plan to address the increased demand for NHS facilities
- The size of school is too large for its plot and will create sub-optimal experience for its pupils

While policies seek to 'optimise' housing output for different types of location, the London Plan also recognises that residential development and densities need to take into consideration 'local context and character and public transport capacity'. Thus, this planning application needs to be reviewed within the context of the physical barriers of the site (the river Thames and the railway line) and the poor level of public transport.

Development Proposal and Design

The combined density of the scheme remains a major concern: there are 897 residential units (including potentially 150 assisted living units and 80 care home rooms), a 1,200 pupil secondary school and 11,616 sq. m. of commercial uses (retail, gym and office etc.). **The brewery site represents about 15% of Mortlake in spatial terms but proposes an increase in the population by circa 40%.** (Refer to Chapter 4). Particular aspects of concern:

- The eastern half of the site is extremely dense (2.6 times more dense than other areas of Mortlake) in layout far exceeding the GLA's existing London Plan guidelines on development

- density and materially exceeding that proposed in the 2010 Barefoot consultation materials and in LBRuT's Monitoring Report on Housing.
- The heights of some of the buildings significantly exceed those set out in the 2011 Planning Brief and do not in all cases reduce at the perimeter of the site and along the riverside.
- The compressed layout (13.5m separate some tall buildings) and building heights place many, and large proportions of the external open spaces and tow path in permanent shadow. There is also an impact on existing residents. Any detrimental effect (loss of light) on existing properties, particularly in the north west of the site, will need to be further assessed
- The design is urban in nature and is out of character with Mortlake's sub-urban nature.
- We welcome that the proposals include a broad mix of residential, commercial and community uses. However, we question the viability of the number of retail outlets, cinema and gym given the proximity of similar businesses
- The area of land allocated to the school is not sufficient; it will provide a sub-optimal experience for pupils. If a school is to be built on this site, then it needs to have a smaller capacity or more land needs to be allocated.

The density of the site, number of residents and visitors will have a significant impact on traffic. We strongly disagree with the statement in the Town Planning Statement that 'the calculated residential density is acceptable in planning policy terms'.

Traffic and Transport

In recent years, much new accommodation has been built in Mortlake and Barnes – the traffic congestion has steadily become worse. While the building may have been piecemeal, the impact on traffic has been cumulative. There has been little improvement to local infrastructure to accommodate this increase (Refer to Chapter 5).

Similarly, with this development, there is no strategic approach to resolving traffic congestion – there needs to be a co-ordinated plan with TFL and the Council. The size of this development will exacerbate a worsening situation with harmful impacts affecting all road "users" including bus passengers, pedestrians and of course people living by them. Current residents (and new site users) will struggle to gain access to the Lower Richmond Road at peak times. There are four major traffic and transport concerns related to this application:

- The cumulative density of the site and large school will substantially increase the number of vehicles and people movements
- The proposals for widening the Chalker's Corner junction will not have a lasting impact on traffic reduction or ease movement/access
- There are no proposals to deal with the increased pressure on the Sheen Lane level crossing
- There is no public transport strategy

Based on our own independent survey and analysis, we estimate that this development will result in an additional 450 to 650 vehicles on the Lower Richmond Road. The School accounts for approximately half of this traffic increasing movements at morning peak hours, particularly by public transport and bicycle. There is a significant difference between the new traffic generation forecast by the Applicant and by MBCG; there is potentially a significant underestimate of the impact this development will have on local infrastructure. There are also problems with the stability of the traffic modelling tool and there are some additional tests we would expect to be included in the Traffic Assessment.

The Chalker's Corner changes will not resolve the issue of increased traffic but will simply attract further through traffic when other roads are congested. The evidence made available about the traffic effects of the Chalker's Corner proposal appears inconsistent and incomplete. A partial "improvement" of road traffic capacity at Chalker's Corner runs counter to current mayoral policy objectives. This junction complex is a strategic roads issue and not a local one. It should be Transport for London that takes the lead on any scheme here and focus on improving the efficient performance of its own roads.

The proposals to change the junction at Chalker's Corner will move the traffic closer to the residents and will increase pollution and noise with a loss of mature trees and OOLTI land.

There is no plan to address the pedestrian and vehicular risks at the Sheen Lane level crossing. The development at the Stag Brewery, particularly from the school, will increase numbers of pedestrians and cyclists seeking to cross the railway either by the footbridge or at road level is of very serious concern and must be addressed by including some material improvement in safety conditions at the level crossing. **The planning application needs to address this in conjunction with the Borough and Network Rail; a significant contribution of the costs of providing this material improvement should be secured through a s106 agreement.**

206

Public transport in this area is extremely weak compared with surrounding areas. The site is served directly by one infrequent bus route; this will need to deliver some of the additional 2,600 am peak-time people movements. There is no evidence to suggest how a reliable increased service will be delivered.

The proposals do not include a strategy for improving public transport. Public transport accessibility will be further decreased if the frequency of the 209 bus service is reduced, as proposed by TfL to accommodate the increase of the 493 bus service. **There needs to be a comprehensive people and transport survey of the whole Mortlake area and those areas from which LBRuT anticipates people will commute to the site and an integrated transport plan included in this planning application.**

Current transport policy emphasis is to improve active travel accessibility levels and to ensure active travel outcomes by improving walking and cycling conditions and reducing and or pricing on-site parking. The intentions of the original 2011 Planning Brief for this development were to apply a suitable and sustainable transport solution. This is not being delivered with this proposal where emphasis is still being given to providing ample car parking and road capacity increases.

The application needs to be more ambitious in reducing the impact of traffic by restricting car use in tandem with improving public transport access to the site.

Protection of Green Space

The 2011 Planning Brief is absolutely clear on the retention of the OOLTI designated sports fields and the creation of the Green Link. The Mayor's strategy to open space and the London Plan both seek to protect existing open landscape and the Greater London National Park City initiative seeks to protect existing open space and also recognises the importance of landscape absorbing pollution. (Refer to chapter 6).

The playing fields, which represents 53% of the open green spaces in Mortlake, and the land at Chertsey court lost as part of the proposed Chalker's Corner junction changes are protected under the classification of 'Other Open Land of Townscape Importance' (OOLTI). While protection is not

absolute, it is certainly not clear from the plans how the developer will meet the criteria which allows development to occur, namely:

- The quantum element needs to be re-tested excluding non-OOLTI elements
- The quality criterion is not met: nowhere on the site is there an area where two football matches can take place simultaneously.
- The openness is also highly questionable, when assessed (as it is required to be) from the perspective of views on to and across the playing fields.

The applicant and the Town Planning Statement state that the landscape provision in the 2011 Planning Brief is exceeded. We dispute this assertion and the basis of its calculation. The inclusion of the large secondary school and sixth form and its proposed siting and resultant removal of the existing sports fields has further diminished the vision for quality open space in the 2011 Planning Brief. We strongly challenge that the design and development proposals accord with London Plan and Richmond Council policy and is compliant with the 2011 Planning Brief.

The loss of the two grass playing fields, which the Council previously indicated it would require to be retained, will prejudice users (one pitch instead of two), neighbours (through floodlighting and traffic), and our ecosystems and may negatively impact flood water protection. It also fails to respect the natural beauty of Mortlake, and the introduction of fences and barriers will impair the current open aspect of the site. The planning application fails to assess a reinforced grass option: ESFA, Sport England and Sport Richmond's views on this have not been canvassed.

Education

LBRuT's requirement that the applicant depart from the planning brief to replace a small primary school with a large secondary school creates a clear tension between housing, school and green space that has not been properly addressed. There is not sufficient space for all to be delivered in the current form. (Refer to Chapter 7)

There is concern of the council's shift from primary to secondary school without proper consultation and whether all possible alternatives for a new secondary school have been properly considered. Furthermore, our preliminary research raises questions over the quantum of secondary school demand and proposes a range of supply options that require further evaluation but appear better-suited to meeting anticipated demand.

We recognise that a smaller secondary school size may not be fit for purpose, is not what the community wants and, if the number of pupils is reduced below 600, would become financially unviable. However, a school of the size proposed is too big for the plot and does not provide sufficient out door space for 1,200 pupils to circulate and participate in sporting activities.

A school of this size will have a significant impact on the number of people movements by car, public transport, bicycles and on foot. We don't believe that the full impact of this has been fully assessed on the local infrastructure, the level crossing and public transport.

There needs to be a proper assessment of the need and right location for a new secondary school accompanied by a robust transport impact assessment.

Affordable Housing

The **affordable housing provision** proposed at just 20% is lower than the council's guidelines. It is also proposed to be concentrated in one area and delivered late in the development which will risk

the provision is further reduced over time. There needs to be a higher provision which should be delivered across the building phases and across site locations. Our examination of the Financial Viability Assessment strongly indicates that the developers have sufficient margin to offer up to 35% of affordable housing on the Mortlake Brewery site. (Refer to Chapter 8)

We wish to record that we strongly disagree with the assertion that "there should be no requirement for any form of viability review after grant of planning submission". This statement needs to be rejected as is unreasonable and unrealistic. We urge the Council to rigorously scrutinise this statement in line with their own policies and recent policy and guidance from the Mayor's Office.

Community and Health Space

There is no **additional NHS care or primary school provision**; existing services will struggle to meet this additional demand, particularly as a number will be elderly in the care units. On-site provision is required: a s.106 contribution will not be adequate for a development of this size where we now there already inadequate local options for such services. no.

The allocation of the Maltings ground floor for community use is a welcomed proposal. However, the current layout of the ground floor needs to be re-examined. In its current design it is not sufficiently flexible to be used for multiple purposes and would make it difficult to be a venture that can support itself financially. Additionally, the space allocated for the Boathouse appears very constrained space for long rowing boats and ancillary space. (Refer to Chapter 9)

Environmental Impact Assessment

- **Demolition and Construction.** There needs to be a more rigorous assessment of the alternative method of transportation of all demolition waste, excavated soil and construction materials via the river instead of the road and the benefits this would accrue to residents of Lower Mortlake Road
- **Air Pollution.** There is no assessment of the other toxic gases (benzene, carbon monoxide, lead, ozone and sulphur dioxide) in accordance with EC Directives and their impact on air quality; no rigorous account of the assumptions made about the potential decrease in pollutants resulting from any increase in electric vehicle use; no indication of how long it would take for new planting at Chalker's Corner to become effective as an absorber of air pollution.
- **Ecology.** There is no assessment of the loss of the grass playing fields as a food resource for birds.
- **Visual.** There is no assessment of the impact of the proposed reconfiguration at Chalker's Corner.
- **Daylight/sunlight.** There is insufficient consideration of the overshadowing of the river, towpath and open riverside spaces caused by the proposed housing blocks. However, to the extent there has been analysis, this reveals that '... there are isolated significant effects to the neighbouring residential properties.

We urge the Council to ensure that these gaps in the environmental impact assessment are addressed (Refer to Chapter 10)

Other Procedural Matters

The MBCG with other members of the community has been involved in the consultation process. The consultation CLG meetings left little room for discussion as they were mainly monologues with

the architects and consultants presenting their designs. We acknowledge that there were alterations to the design during this process, however, these just realigned the design with the 2011 Planning Brief and other planning policies and/or were subsequently reversed.

We feel that there have been inadequate responses on the main issues that were raised and dominated most meetings. (Refer to Chapter 11)

In Conclusion

We remain supportive of the 2011 planning brief's proposals which has a good balance of housing (including affordable), commercial/retail units, green spaces extending from Mortlake Green to the river, while retaining some of the historical aspects of the area. In complying with the principles of this brief, the development would be an asset to the local community. As outlined in this executive summary, the accompanying sections and the formal Conclusion (Refer to Chapter 12), we have the remaining objections:

- high cumulative density
- Impact on traffic and public transport
- Efficacy of the Chalker's Corner proposals
- Size of the school
- Protection of the OOLTI green spaces
- Provision of NHS facilities
- Level of provision of affordable housing

Chapter 2 - Background

Mortlake Brewery Community Group (MBCG) is an umbrella group of residents and representatives of local organisations with a common interest in ensuring that the redevelopment of the brewery site provides a new village heart for Mortlake with buildings and public spaces of the highest quality. The Group is not politically based and does not include representatives of political parties.

We are not opposed to the development but seek to ensure that it answers the needs of all residents and visitors, now and in the future.

We have been involved in the Brewery redevelopment since 2010 when the site was first proposed for sale. In 2011, this Group shaped the Planning Brief in conjunction with Richmond council and remains supportive of the brief's proposals which has a good balance of housing (including affordable), commercial/retail units, green spaces extending from Mortlake Green to the river, while retaining some of the historical aspects of the area. In complying with the principles of this brief, the development would be an asset to the local community and were influential in producing the 2011 Stag Brewery Planning Brief.

We have held regular meetings with local residents, attracting 100+, and have been active in the local vicinity to ensure awareness of the development. We have also had regular dialogue with key parties including:

- The developer's representative (Dartmouth Capital), its architect (Squires) and transport adviser (PBA)
- LBRUT Councillors and Officers
- GLA
- Network Rail
- Local MP

This submission has been prepared by panel of local experts and with the involvement of Harwood Savin Ltd, a team of planning consultants.

A short summary of the key contributors and their experience is outlined below.

Name	Experience
Howard Potter	Howard is a Chartered Civil Engineer and Town Planner with many years' experience directing or managing a broad range of planning and transport studies projects and research. His career whilst in the public sector was concluded with some 8 years as the first Chief Officer responsible for transport planning and engineering in London's Docklands where he was responsible for the creation and execution of a multi-million multi-modal transport strategy for the area and its integration within the Dockland's masterplanning work. He founded and ran the LDDC's Use of the River Group to facilitate greater use of the Thames for freight and passenger transport. He has worked extensively in the private sector with consultants Wootton Jeffreys, Atkins, TPi and Amey at Director and Technical Director levels and has been responsible for a large number of land-use and transport planning studies, urban transport studies, local and national parking strategy and policy studies, airport surface access studies in the UK, Greece and India, toll road studies, road pricing studies, sustainable transport and public transport studies. He has carried out research into innovative highway and urban design approaches for the Highways Agency and acted as a facilitator for the HA. Howard serves as vice chairman on the ICE's Expert Transport Panel, the Board of the Transport Planning Society, is Chair of the multi-

Name	Experience
	institution special interest group on road pricing (the Green Light Group), Chair of the Stratford Transport Implementation Group (overseeing sustainable transport investment for the major Stratford City developments and the Olympic Park).
Keith Sowerby	<p>Keith was a Director of Steer Davies Gleave until his recent retirement where he was head of development planning. He advised numerous clients in the private and public sectors on transport matters over a career of 43 years. He advised the GLA on its public transport strategy for Outer London and was principal author of Transport for London's Transport Assessment Guidelines (First Edition). He advised the Royal Star and Garter Home on its recent sale, in particular the agreement of an adopted Planning Brief with LBRUT.</p> <p>He has directed and managed a wide range of transport planning, modelling and research projects, including the preparation of transport strategies and policies and was the principal transport adviser to the Canary Wharf Group, representing it on the Canary Wharf Transport Forum and liaising with all divisions of Transport for London. He was responsible for a number of major commercial and transport infrastructure projects in the UK and overseas and has appeared at many planning and transport infrastructure public inquiries.</p> <p>Keith has been an expert witness at numerous public inquiries, including several public inquiries into highway schemes in London, including the Lower Lea Crossing. He has represented clients at planning inquiries and parliamentary committees. He has been responsible for projects covering most types of land use. He worked closely with private sector clients on development projects and has extensive experience in the planning of major offices, housing, retail, hospitals and other land uses. Keith has a wide range of skills and knowledge of tools for the evaluation of developments, including traffic models and junction evaluation software.</p>
Peter Eaton	Peter is an architect and director of a large international architectural and design practice based in London and with studios in Moscow, Istanbul, Berlin, Frankfurt, Prague Abu Dhabi and Dubai. Peter specialises in large complex mixed-use master planning projects and advising on clients' real estate strategy. He has completed many design award winning schemes for corporate businesses and educational bodies and has wide experience in a range of development sectors including residential, offices, academic and life sciences. One of his schemes for Trinity College Cambridge was recently awarded the prestigious Cambridge Design and Construction Award 2017. Peter lives locally on the riverside in Mortlake and played a major role in working with Richmond Council on the detailed Planning Brief for the Stag Brewery site which was formally adopted in 2011 to guide future development of the Stag site.
Tim Catchpole	Tim has had a 40-year career in urban planning and environmental impact assessment (EIA). His first 15 years were spent here in London and included 11 years at the Greater London Council. His next 25 years were spent in the master planning team of a leading UK engineering consultancy, with whom he has led major development projects in the UAE, Saudi Arabia, Qatar, Jordan, Iran, India and China and contributed to such projects also in Brunei, Venezuela and South Korea, also to planning policy projects in Yemen, Mauritius and the West Indies. He has led EIA studies of major development projects in the UK and Malta and contributed to EIA studies of major infrastructure projects in the UK, Bangladesh, Thailand, Malaysia, Indonesia and the Philippines. After retiring as director of this team he has been free-lance planning consultant on major development projects in South Africa and Uganda. He is a Fellow of the Royal Town Planning Institute.
Carl Thomas, Harwood Savin Ltd	Harwood Savin Limited was set up in 2006 and is a close-knit team of Chartered Town Planners and property professionals many of whom have West End and City based experience. They offer bespoke and professional consultancy services on all aspects of town planning across both the private and public sector, from small-scale domestic projects to major strategic residential, education and commercial proposals, including mixed use developments across the UK. They assist with planning applications and appeals and provide advice at the pre-application stage, including undertaking public consultation and community engagement.

Name	Experience
Louise Markose	Louise has over 13 years' experience working in flood risk and water management. She has predominantly specialised in the development sector but has also worked on behalf of councils and the environment agency delivering their projects. She headed up a team of hydraulic modellers, hydrologists, and economists in her last role. She now leads the water team at WSP London within their transport and infrastructure team delivering flood risk assessments and environmental impact assessments for nationally significant infrastructure projects.
Dr Emma Jack	Dr Emma Jack is an Environmental Specialist with 20 years' experience in natural resource management, climate change planning, and environmental construction compliance, specifically stormwater and air quality. She grew up in East Sheen and then moved to California where she has worked on numerous public and private planning projects including large infrastructure schemes, housing estates, retail parks, and large-scale remediation and restoration projects. More recently she has moved to Brussels where she runs an ecotoxicology department for a chemical industry consultancy and has begun a Master's degree in Environmental Law (LLM) by distance learning, to update her knowledge on both UK and EU environmental practice and regulation.

Chapter 3 – Policy Basis for Objection

This chapter identifies the planning policy and guidance at a national, regional and local level relevant to this proposal. It then identifies key planning considerations against which the planning application will be determined. The proposed development is assessed against these key planning considerations and objections are made on this basis.

3.1 Relevant Planning Policy and Guidance

This is found in the following documents:

National

The **National Planning Policy Framework (2012)**, published by the UK's Department of Communities and Local Government, consolidates the many previously issued Planning Policy Statements and Planning Policy Guidance Notes. The document provides a framework for the regional and local plans in England and gives emphasis to development being sustainable alongside a low carbon future.

The **Draft National Planning Policy Framework (2018)** includes additional proposals to change planning policy and legislation including reform of developer contributions to bring forward more land in the right places. This document was the subject of consultation from 5 March to 10 May.

Regional

The **London Plan (2016)** is the statutory spatial development strategy for the Greater London area produced by the Mayor of London and published by the Greater London Authority. The regional planning document was first published in final form in 2004. It was substantially revised and republished in 2008 to take into account plans for the London Olympics and Crossrail and then again in 2011. In 2013 minor alterations were made to the plan to comply with the above-mentioned National Planning Policy Framework and the 2016 Plan consolidates these alterations.

The **Draft London Plan (December 2017)** promotes further changes, identifies new opportunity areas and imposes increases in housing targets for the London boroughs. The Plan was the subject of consultation from 1 December 2017 to 2 March 2018, a

public examination is expected to start in November 2018 and final publication would be in winter 2019-20.

Local

The existing **Local Plan for the London Borough of Richmond upon Thames** sets out how and where development in the borough will be delivered in the future and is currently made up of a series of documents that include the following:

- The **Unitary Development Plan (Saved policies) (March 2005)**. This has been largely replaced by the subsequent Local Plan Core Strategy and Development Management Plan. The only parts of the UDP that remain saved and have not been superseded are the site-specific proposals.
- The **Core Strategy (April 2009)**. This outlines the vision and spatial strategy for the borough and includes 20 core planning policies on matters including climate change, housing, employment and retailing. It provides the framework for the development of other Development Plan documents within the Local Plan.
- The **Development Management Plan (November 2011)**. This builds on the objectives and principles of the Core Strategy and includes more detailed policies for the management of development.
- The update **Publication Local Plan (January 2017)**. This will in effect supersede the above three documents setting out an updated vision, spatial strategy and planning policies and an updated list of site-specific proposals. The Plan was the subject of consultation from 4 January to 15 February 2017 and a Public Examination from 26 September to 12 October 2017. Proposed Main Modifications were the subject of consultation from 22 December to 2 February 2018. The Inspector's Report is expected very soon and the final version of the Publication Plan will be submitted to the Council's Planning Committee for adoption during the summer. No
- The **Supplementary Planning Document Stag Brewery Planning Brief (July 2011)**. This sets out the guidelines on the future uses, layout and design for the redevelopment of the site.

There are various other Supplementary Planning Documents that may be relevant.

3.2 Key planning considerations against which the planning application will be determined

It should be noted that the Council, in dealing with current planning applications, makes reference to both the existing policies contained in the Core Strategy (CP..) and Development Management Plan (DM..) and the new policies in the update Publication Local Plan (LP..) that are expected to be adopted.

3.2.1 Character and Design

DM DC1: Design Quality

New development must be of a high architectural and urban design quality based on sustainable design principles. Development must be inclusive, respect local character... and connect with, and contribute positively to, its surroundings based on a thorough understanding of the site and its context.

In assessing the design quality of a proposal the Council will have regard to the following:

- Compatibility with local character including relationship to existing townscape and frontages, scale, height, massing, proportions and form (LP1 has added density)
- Sustainable development and adaptability, subject to aesthetic considerations
- Layout and access
- Space between buildings and relationship to the public realm
- Detailing and materials

LP1 re-iterates this and adds in particular:

- density
- inclusive design, connectivity (as such gated developments will not be permitted)
- suitability and compatibility of uses.

DM DC5: Neighbourliness, Sunlighting and Daylighting

In considering proposals for development the Council will seek to protect adjoining properties from unreasonable loss of privacy, pollution, visual intrusion, noise and disturbance.

To protect privacy, for residential development there should normally be a minimum distance of 20m between main facing windows of habitable rooms.

The Council will generally seek to ensure that the design and layout of buildings enables sufficient sunlight and daylight to penetrate into and between buildings, and that adjoining land or properties are protected from overshadowing in accordance with established standards.

LP8 reiterates this and adds: The Council will ensure that proposals are not visually intrusive or have an overbearing impact as a result of their height, massing, or siting, including though creating a sense of enclosure.

3.2.2 Open Land

DM OS3: Other Open Land of Townscape Importance (OOLTI)

Other open areas that are of townscape importance will be protected in open use.

It will be recognized that there may be exceptional cases where appropriate development is acceptable. The following criteria must be taken into account when assessing appropriate development:

1. It must be linked to the functional use of the OOLTI; or
2. It can only be a replacement of, or minor extension to, existing built facilities;
3. In addition to 1 and 2, it does not harm the character or openness of the open land.

LP14 re-iterates this.

DM OS6, OS7 and OS8: Public Open Space, Play Facilities, Sport and Recreation

Public open space, children's and young people's play facilities as well as formal and informal sports grounds and playing fields will be protected, and where possible enhanced.

LP31 reiterates this and adds: Where on-site provision of public open space, play space or new playing fields and ancillary facilities is not feasible or practical, the Council will expect existing surrounding facilities and spaces to be improved and made more accessible to the users and occupiers of the new development through for example improved walking or cycling links or enhancements of play space, or existing playing fields and associated sports facilities.

DMOS9: Floodlighting

Floodlighting of sports pitches, courts and historic and other architectural features will be permitted unless there is demonstrable harm to character, biodiversity or amenity.

The following criteria will be taken into account when assessing floodlighting:

- benefits and impacts of the provision of floodlighting on the wider community
- benefits and effects on the use and viability of the facility
- impacts on biodiversity and wildlife
- impacts on residential amenity and wider public
- impacts on local character.

LP9 reiterates this and adds:

- that it meets an identified need as set out within the Council's playing pitch strategy.

3.2.3 Community Facilities

CP18: Education and Training

The Council will ensure that the provision of schools... is sufficient in quality and quantity to meet the needs of residents.

Facilities and services for the education and training of all age groups should be in locations that are conveniently accessible to users

LP29 adds: The Council will work with partners to encourage the provision of facilities and services for education and training of all age groups to help reduce inequalities and support the local economy by... identifying new sites for educational uses as part of this Plan. It does not, however, reiterate the facilities being in locations that are conveniently accessible to users.

CP17: Health and Wellbeing

The provision of new or improved facilities for health and social care and other facilities will be supported. Such facilities should be in sustainable locations and accessible to all...

LP30 reiterates this.

3.2.4 Housing

DM HO5: Housing Needs of Different Groups

Planning permission will be granted for new accommodation where housing is providing for an identified local need, across a range of tenure, providing they are in a site and in a location suitable for that particular use, and in accordance with environmental, transport, parking and other relevant policies.

LP37 reiterates this.

DM HO6: Affordable Housing

The Council expects 50% of all housing units will be affordable housing, with a tenure mix of 40% housing for rent and 10% intermediate housing.

On sites below the threshold of 'capable of ten or more units gross' a financial contribution to the Affordable Housing Fund commensurate with the scale of development, in line with the sliding scales set out.

LP36 reiterates this.

3.2.5 Transport

DM TP1: Matching Development to Transport Capacity

Higher trip generating development will only be permitted in areas which are, or at the time of implementation are, easily accessible by transport other than the private car, and well located with respect to local services.

DM TP3: New developments will be expected to create or improve links with the local and wider transport networks, including links to the cycle and pedestrian networks.

All new developments must be designed to improve accessibility including: -

1. Maximize permeability with safe, convenient, accessible and appropriate road, cycle and pedestrian routes within and in the immediate vicinity of the scheme, as well as accessible walking and cycling links to the wider transport network including to public transport nodes and key land uses, taking account of the need to connect people to jobs, to town centres and to schools.
2. Gated communities will not be permitted.

LP44 reiterates these policies and adds the following of note:

The Council will work in partnership to promote safe, sustainable and accessible transport solutions which minimize the impacts of development including in relation to congestion, air pollution and CO2 emissions, and maximize opportunities including for health benefits and providing access to services, facilities and employment.

The Council will ensure that new development does not have a severe impact on the operation, safety or accessibility to the local or strategic highway networks. Any such impacts from the development itself or the cumulative effects of development, including in relation to on-street parking, should be mitigated through the provision of, or contribution towards, necessary and relevant transport improvements.

LP45 introduces a policy on Parking Standards:

The Council will require new development to make proper provision for the accommodation of vehicles in order to minimize the impact of car based travel including on the operation of the road network and local environment and ensuring making the best use of land. It will achieve this by: requiring new development to provide for car, cycle, 2 wheel and, where applicable, lorry parking and electric vehicle charging points in accordance with the standards set out in Appendix 3. Opportunities to minimize car parking through its shared use will be encouraged.

Appendix 3 indicates parking standards as per the GLA standards. The Draft New London Plan shows these as 1 space per housing unit in Outer London PTAL 2 and 0.5 space per unit in Inner London PTAL2.

3.2.6 Site Allocations

SA24 Stag Brewery

The provision of an on-site new 6-form entry secondary school, plus sixth form, will be required. Appropriate uses, in addition to educational, include residential (including affordable housing)... as well as sport and leisure uses including the retention and/or reprovision and upgrading of the playing field.



This page has been left blank



This page has been left blank

Chapter 4 - Development Proposals and Design

Introduction Design Background and Evolution

The Town Planning Statement for the Former Stag Brewery site, prepared by Gerald Eve (Feb 2018), sets out a summary of the redevelopment proposals, the Planning Brief, Site Allocation and the Application Structure, together with a number of other key subject sub-sections.

In sub-section 4 - The Development Proposals - the Town Planning Statement outlines the specific proposals and individual land uses contained in the inter-linked applications. It also makes specific reference in 4.3 to various objectives contained in the Adopted Planning Brief, (SBPB), and how the design of the development has evolved with consideration of key design principles which reflect the objectives as set out within the SBPB.

The Design and Access Statement (D&AS),- Masterplan Proposals - prepared by Squire & Partners also makes selective reference to various objectives set out in the Adopted Planning Brief.

The principle of redevelopment of the former Stag site has consistently been supported by the local community, but not at any cost. Indeed the community and specifically the MBCG were instrumental in assisting Richmond Council in the preparation of the Adopted Brief for the site after several years of local consultations.

What both the Town Planning Statement and the Design and Access Statement neglect to highlight are the background statements in Sections 1.15 to 1.20 in the Adopted Brief. These sections make clear the outcome of public consultations over 2007/8 to-2010/11, supporting re-development of the site in a sustainable manner but very clearly highlighted deep public concerns of certain key issues namely;

- The over-development of the site for high density housing is a concern
- The principal existing issue is that of traffic congestion and poor parking in the area
- Conclusions from consultation supported lower density high quality housing
- Building heights
- Large scale destination uses were felt inappropriate and out of character

In this section of our Response to the Stag Brewery planning applications we outline our comments and objections to specific aspects related to the composition, density and designs contained in the development proposals. Aspects related to the School and Chalker's Corner planning applications are dealt with more fully in separate chapters. Our Response has taken into consideration the following documents and drawings accompanying the applications:

- The Submission Drawings - main subject site
- The Various Volumes of the Design & Access Statement - Masterplan Proposals
- The Town Planning Statement
- Open Space and Playing Pitches Assessment
- Other Detailed Reports

The headings we have used in this section of our Response relate to the headings and numbering specific to composition, density, and design in Gerald Eve's Town Planning Statement. The key subjects which we comment on, and challenge or object to, can be summarised as follows:

- Excessive Cumulative Density
- Viability and appropriateness and extent of certain land uses

- Highly dissipated Flexible Use Space and lack of 'concentrated Heart'
- Inadequate and inflexible Community Space
- Urban design in Sub-urban Context
- Inadequate space between certain buildings
- Absence of animated, active frontage to Mortlake High Street
- Building Heights contravening the Adopted Planning Brief
- Inappropriate Massing and Height of Buildings on the Riverside frontage
- Urban building typologies in Sub-urban context
- Inadequate Open Space related to base provisions in the Adopted Planning Brief

Community Engagement & Development Proposals Design Evolution

Engagement with the applicant and their design team commenced in earnest in the summer of 2016. Despite repeated meetings and wider liaison with the development team through to the end of 2017 the community's primary concerns related to cumulative density, over-development, traffic generation, loss of protected sports fields, Chalker's Corner proposals, and the size of the secondary school, all inherent aspects of the evolving designs which continued to be ignored, and sadly the application design proposals still contain those features of concern and objection.

The applicant has made much play related to the extent of their consultation and community engagement but none of the submitted material adequately addresses the long-standing concerns related to over-development of the site. Despite two public exhibitions and several CLG meetings key public concerns remain and we wish to record that:

- The CLG meetings were mainly monologues with the architects and consultants presenting their designs leaving very limited, indeed negligible time for debate/dialogue. This was despite requesting more time for discussion and workshopping with the design team.
- The D&AS makes reference in 3.4 page 42 to concerns highlighted by residents but conveniently neglects to highlight one of the community's primary concern, namely cumulative density and the consequent issues of design quality and traffic generation, pollution and safety.
- The 'significant amendments' to the scheme noted in the conclusion of Section 7 of the Town Planning Statement were not constructive amendments of design evolution but simply adherence to either the Adopted Planning Brief or broader Planning Policy.

Section 10 -Town Planning Statement - Planning Considerations - Proposed Land Uses.

We acknowledge that the proposals include a broad mix of residential, commercial and community uses. We will deal with the cumulative density issues later in our Response report but wish to point out the following in response to specific land uses:

- Housing and Affordable provisions - covered separately in this Response Report. However, we wish to record total disagreement with the proposal in the Town Planning Statement -Item 10.23 that, "there should be no requirement for any form of viability review after grant of planning submission" We wish the Council to reject this wholly unreasonable and unrealistic stance in relation to the affordable housing component of the application, and the delay of any provision until completion of the eastern half of the development.
- Flexible Use - we note the provision of 4664 sqm. of ground floor flexible space. This space is distributed on the edges of the Green Link, on the new Thames Street and in locations on the riverside, elevated behind the retained flood wall/towpath. Development will create it's own trade for the mix of shops, restaurants,cafes, bars etc. and will hopefully also attract residents from the

wider community and visitors. However we continue to strongly question two specifics of the distribution of the flexible space;

- We challenge whether it is feasible to expect viable commercial units so widely distributed around the eastern half of the site, particularly the extent those on the riverside.
 - Some of the flexible space is very small and shallow in depth. We challenge whether these constitute viable units
 - If a prime aim of the site's redevelopment is to 'put the heart back into Mortlake' then surely the active flexible uses should be concentrated on the Green Link and Malting Plaza by the riverside.
- Offices - there is a very low provision of office space - just 2424 sqm. mostly located in one major block and single footprint configuration. We challenge whether this will satisfy the local needs and satisfy the objectives set in the Adopted Brief - Items 5.11/5.12.
- New Cinema - the area is very well served by local cinemas with major national operators in Richmond, Kingston and Putney. The more recent Olympic Studios cinema serves the immediate locale very well and is now adding a third screen. We have challenged the developer over the viability of this use without any substantiated case being put forward. We are not aware of any agreements with operators to take on this very local market and small screen provision. There is also considerable concern about encouragement of car movements both day-time and night-time, and management of parking provisions, both of which are under-played in the transport assessments.
- Gym - the designs include a gym - 740sqm. We are aware that the Topps Tiles site on the Upper Richmond Road is currently proposed for conversion into a large gym through a national provider. There are also other local gyms run by Richmond Council and local providers. A gym already operates on Mortlake High St. We challenge whether the area can support yet another operation.
- Boathouse - Sui Generis provision of 351sqm.(max floorspace cap). The MBCG were instrumental in introducing the developer to a potential rowing club occupier. The boathouse space is proposed to be located on the ground floor of Block 9. The plans indicate access to the residential space above ground floor on the axis of Thames Street. This leaves very constrained space for long rowing boats and ancillary space. We support the proposed use but question the suitability of the ground floor accommodation for quality space in a new development. There are no obvious external landscape features to ease access to the Bulls Alley slipway from/to the boathouse and to negotiate the complex changes of level and retained flood wall features. It is extremely disappointing that the designs do not incorporate any access/piers/jetties to interface with and exploit the site's relationship to the River Thames. Clearly tidal changes are significant, but the former brewery did have a pier close to The Ship - now removed, but this previous facility creates an strong precedent for riparian access and uses. The recently developed St. Georges's Fulham Reach residential scheme on the north Thames bank, downstream from Hammersmith Bridge, has integrated an articulated pier which successfully handles the same large tidal fluctuations.
- Community Space - Class D1 provision 468sqm. We welcome a community space provision which also acknowledges both the Adopted Brief and local community needs. However, we have made representations to the applicant challenging the flexibility and suitability of the ground floor and part first floor accommodation located in the Maltings and illustrated in the plans and the Design and Access Statement. Indeed the MBCG and MCA have jointly provided the applicant with 'alternative' detailed plans to show an improved layout for community space whilst crucially still optimising the residential accommodation above. We have outlined to the applicant the community aspirations to create in the Maltings a flexible facility similar to the highly successful OSO in Barnes Village. These suggestions have been ignored, leaving very poor space proposed for

community use at the base of the Maltings. This is a huge missed opportunity, and a wholly inadequate provision for the Mortlake Community. This completely flies in the face of the overarching objective of putting the heart back into Mortlake; a primary tenet of the 'vision' embodied in the Adopted Planning Brief.

#

Section 12 Town Planning Statement - Planning Considerations - Residential Design

From the outset the community has been supportive of re-development of the Stag site and has seen its regeneration as an opportunity to put the heart back into Mortlake and assist in meeting both local housing needs and contribute to London's wider housing mix and needs. It has always been considered as an opportunity for an exemplar residential driven mixed-use redevelopment.

The sheer cumulative density of the proposals and resultant traffic congestion/pollution however remain elements of the greatest concern and objection to this hybrid application. Despite the submitted transportation reports our assessments conclude that the site and the local infrastructure will come to gridlock with the combination of 897 residential units, a secondary school and some 11,648 sqm of commercial mixed uses.

Early 'Barefoot' consultations led by Richmond Council in 2008-10 were very comprehensive involving community engagement on an intensive level. This culminated in the Council's specialist consultants Taylor Young exhibiting in November 2010 four broad approaches to development of the Stag site - Two designs (Potential Approach 1 with Local Community Benefits and Approach 2 with Wider Community Benefits). These both illustrated mixed development with community benefits and 390 residential units. - The two other higher density schemes, (Potential Approach 3 with Boroughwide Community Benefits and Approach 4 with Local and Boroughwide Community Benefits). These two other designs proposed 560 residential units and a mix of other uses. The outcome was unanimous support of the lower density development and this was enshrined in the Planning Brief. **The Planning Brief was then Adopted the following year and clearly directs potential development (as per paragraph 1.17 of the Planning Brief¹) to apply the 'lower density' approach of 390 residential units.** This was of course with a primary school provision on the site with a lower land take than the subsequent requirement of the secondary school. Each of the Approaches considered had a range of densities in various parts of the site (the lowest 40-50 to the north west), with higher densities of 80-100 & 150-180 nearer the centre of the site, but overall creating a gross density of 390 units.

We recognise that the London Plan Policy 3.4 seeks to 'optimise' housing output for different types of location and the Density Matrix in Table 3.2 of the Housing Supplementary Planning Guidance March 2016 provides further guidance in this respect. At present this is the recognised guidance on residential density and we make further reference to this later.

However the London Plan recognises that residential development and densities need to take into consideration 'local context and character and public transport capacity' (1.3.51), and also that 'other more local or site specific factors may also be given appropriate weight, taking into account the particular characteristics of a proposed development and its impact on the surrounding area'.(1.3.52)

We also refer LBRuT officers to a recent legal judgement²). Planning authorities are required to take due account of the particular environmental consequences of large-scale development, in particular in the context of NPPF paragraphs 120 and 124, and especially in the Air Quality Management Area, as we have

¹ " The conclusion from the consultation was that the lower density, high quality housing schemes with community benefits including a primary school/community hub, open space (including retention of existing playing fields and creation of new open space links), leisure uses such as museum, craft centre, cafe and community space and boat house and small scale employment spaces was the most favoured approach. The alternative approach which also included a new leisure destination(including a mix which could include international or recreational ice rink, cinema, bowling alley, gym and cafe and bars) was less popular due to the higher density housing required for viability and the transport issues.

² J. v. H. (2015) which itself followed the F. v. H. (2014) decision, and has been followed by the F. v. H. (2015) decision.

here. It is clear that a planning authority needs to scrutinise the EIA emissions data and, if (notwithstanding the applicant's EIA) it concludes that the proposed scheme will or is likely to have a prejudicial impact- it is unnecessary to determine the precise level- it is perfectly entitled to refuse the application. This decision acts as a legal counter-weight to the direction of travel for the potential of increased density for residential development in the draft London Plan.

In the case of the Stag site we wish to highlight the following:

- The site is un-accessible for vehicular traffic from the north, bounded by the River Thames
- The site suffers considerably from access to/from the south due to the Richmond to Waterloo railway line and four level crossings at North Sheen, Mortlake, White Hart Lane and Vine Lane, Barnes. These create a significant obstacle to movement over several miles with the only bridges over the railway by Barnes Railway station and to the west on Clifford Avenue. The transportation section of our Response further highlights the impediment these local characteristics to vehicular, cycle and pedestrian movement which will be exacerbated with the proposed development in the hybrid applications.
- Vehicular traffic to/from the site is limited to the Lower Richmond Road and Mortlake High Street which are already super-congested not just at peak times and very regularly at weekends
- These level crossings create substantial barriers to vehicular traffic, cyclists and pedestrians
- The operation of the level crossing barriers has been surveyed by the MBCG and are shown to be closed down for periods of 43 minutes in the hour at peak hour times
- The level crossing at Mortlake is considered a significant safety risk by Network Rail
- The site is PTAL rated 2 with other areas PTAL 1 furthest from the railway station.
- The applicant has stated that the site is 170m from the East Sheen District Centre. This is completely misleading as it is measured from the southern edge of the site to the south side of the level crossing and the nearest shops on Sheen Lane. East Sheen is actually linear in nature with Sheen Lane intersecting with the Upper Richmond Road. Parts of the site in the north west and north east are over 800m from parts of the linear Sheen facilities. More crucially however, the site is segregated from East Sheen for large periods of the day due to the level crossing at Mortlake Station affecting vehicle movements, pedestrians and cyclists alike in terms of accessibility.

These are very clearly significant 'local context and character' aspects and 'other local or site-specific factors' which we maintain have not been sufficiently or appropriately taken into account with both the design and quantum of proposed cumulative development.

Local context

Further to this the site is surrounded by a sub-urban grain of local development and Richmond Council have designated the title 'Village' to this and other specific areas around the borough. Clearly a 8.62 Ha (21.20Ha) land-holding will create its own characteristics due to scale but any development of the Stag site needs to respect the surrounding context and character of the built environment. It must also protect the village character recognised by the Council and the local community. There are two main points to this assessment. The first relates to the interpretation of the Density Matrix (Table 3.2). and the second to the design of the proposed buildings. Before specifically dealing with proposed density we wish to highlight the following:

- The existing site context comprises predominantly low-density development in the form of detached, semi-detached, terraced and some low-rise flats units with predominantly residential, small building footprints, typically two and three storey.
- The local residential density varies from as low as 50 units/ha to 88units/ha. The average for the whole of Mortlake is 70 units/ha.
- The character of the area is influenced by Victorian and Edwardian street patterns
- The local context includes Listed Buildings, buildings of Townscape Merit, and the site is bounded by Conservation Areas.

All of these factors are important aspects when considering the proposed site density for the residential component of the application and the cumulative density of the whole scheme. We do not believe they have been given accurate or appropriate recognition in the proposed applications.

- We note that the Matrix ought not be applied strictly and in a mechanistic way but remains the current London Plan guide to residential densities. The Mayor is currently reviewing the London Plan and guidance on density and this refined approach places emphasis on local context and local factors and the ability of the local infrastructure to support residential densities. We have carefully assessed the proposed scheme and carried out our own measurements and calculations in relation to the proposed density. We have assessed both the overall proposals and also the individual densities of east and west zones of the site.
- The application for the Stag site itself quotes a site area of 9.2Ha. but this now includes for areas outside the landholdings of the applicant namely, Williams Lane, The Towpath, Ship Lane and the crossing point over the Lower Richmond Road to Mortlake Green. The actual site which ought to be considered in terms of density is the land under the applicant's ownership - 8.62ha (21.20 Acres).
- By our calculation the site's residential density on the western half of the site is 150 units/ha. This excludes the secondary school land and the land reserve allocated for the future 209 bus terminal. It also excludes the Park which is the remnant of the sports fields which were protected land and not intended for development in the Adopted Planning Brief.
- Excluding the terraced houses from the calculations the density on the western half of the site increases to 170units/ha - (almost 300% greater than most of the surrounding context), and this very high density, compared with the surroundings, is manifested in the dense, large blocks of units to the north and east of the school, some of which exceed the height constraints set out in the Adopted Planning Brief.
- The eastern half of the site to the east of Ship Lane is even more dense. Taking into account the total declared floor areas and the commercial uses, (11,648 sum - 18.86% of total declared floor space), then the density equates to 183 units/ha.
- However, the Green Link was a fundamental part of the Adopted Brief and was always considered a non-developable part of the site. Any scheme would therefore need to provide its own public realm and open space over and above the land reserve of the public Green Link. Site density thus increases to 217 units/ha. - (almost 400% greater than most of the surrounding context).

By comparison the 'highest' ranges of density in the London Plan Table 3.2 Matrix are as follows:

Suburban Setting - PTAL rating 2-3	: 80 units/ha
Suburban Setting - PTAL rating 0-1	: 65 units/ha
Urban Setting - PTAL rating 2-3	: 145 units/ha
Urban Setting - PTAL rating 0-1	: 80 units/ha.

- Accounting for some degree of interpolation between these guidelines and taking into consideration that there is no proposed comprehensive strategy or integrated improvement to public transport, nor indeed capacity for improvement of the Richmond to Waterloo rail service,

then it is reasonable to apply a density of circa 112 units/ha on a pure density matrix methodology. The proposed designs vastly exceed these figures.

- The subject site measures 8.62ha. After excluding the proposed school site, the bus turn-around reserve, the small public park, and the Green Link, (the latter two spaces being non-developable areas in the Adopted Planning Brief), and the terraced townhouse, then the site density should equate to 553 residential units. (ie: 4.933 ha x112 units/ha = 553 + 24 townhouses = 577 units in total) This is remarkably yet not surprisingly close to the maximum 560 units proposed via the 'Barefoot' consultations in 2007/8 to 2010.
- When one then takes into consideration the capacity of the local infrastructure to cope with the increased traffic for the cumulative development (residential, school and commercial uses, plus visitors and deliveries etc), on an already saturated local road network then the proposed density within the hybrid applications is clearly untenable.
- We strongly disagree with the conclusion under item 12.17 of the Town Planning Statement that, 'the calculated residential density is acceptable in planning policy terms'.

#

Housing Quality - Design Standards

As a direct consequence of the proposed site density and layout the design only provides 'adequate levels of privacy' (see 12.49 of Town Planning Statement), and almost 5% of the design involves single aspect units. The Adopted Planning Brief and aspirations for this unique riverside site set higher benchmarks for what ought to be an exemplar scheme. Some of the units are extremely close to one another, 13.5m along Thames Street and 15m in other instances. We strongly challenge that, 'the proposed residential units would be of excellent quality' as stated in 12.51 of the Town Planning Statement.

Section 13 Planning Considerations - Design and Layout

Layout

- We support the general layout concept which does provide levels of permeability between the High Street and Lower Richmond Road and the riverside/towpath. The Green Link, the Maltings Plaza and the Square on Thames Street are all positive aspects of the layout and general design. However, we do consider the layout very dense particularly in the eastern half of the site. It is very urban in character and this is increased by the proportions of some of the spaces with a combination of narrow routes, (13.5m and 15.0m), and high buildings flanking these routes up to seven floors. This is very clearly demonstrated by the scale models shown at Exhibition.
- We support the removal of the eastern part of the boundary walls on Mortlake High Street, however the designs for the development at the rear of the retained historic walls on the western half of the High Street are at best disappointing and do miss greater opportunities to enliven the High Street and create a level of active frontages. Whilst still respecting the historic fabric and fenestration pattern of the existing facades, improvements could be made to open views to the proposed offices, flexible space, and hotel/pub space in Building 5.(see SBPB 2.36 and 5.26).
- We have suggested the re-alignment of the basement parking ramp under Building 10 so that it is shielded from view from the Mortlake High Street. The applicant and their consultants agreed to consider adjusting the plans to respond to concerns voiced in writing and in consultation meetings but have clearly ignored the community suggestions and concerns. As proposed it creates a very negative and visually intrusive frontage to the High Street when combined with the sub-station alongside. As proposed the ground floor arrangement does not comply with the Planning Brief - Section B Land Use - Mixed Use Vision and Policy CP19 DM TC2 and DM DC2.
- There is concern that some of the external courtyard spaces intended to be public may become 'privatised' by residents over time. Indeed the D&AS quotes that the courtyards between Buildings 2/3 and Buildings 7/8 are semi-private. This is unacceptable and contradicts statements in the Town Planning Statement and the Landscape and Open Space Report.

- The heights of some of the buildings still significantly exceed those set out in the Adopted Planning Brief. Building 18 rises from 4 floors, and then steps up to 5 floors and increases finally to 6 floors. Combined with Building 19 at 4 floors this creates a massive scale close to existing residents on Watney Road, Williams Lane, Wadham Mews and the other residents to the north west of the site. There is no justification for these heights. A maximum of 3 floors is clearly indicated in the Planning Brief in this part of the site. The same applies to the northern end sections of Buildings 16 and 17.
- The form of Building 18 indicated in the Codes sections of the D+AS is dominant and lacking permeability and relief of massing and bulk. This is in direct conflict with the Planning Brief which requires only smaller scale 3 storey buildings, (and Primary school - single storey), in this part of the site, thus respecting the local residents and the local context of 2/3 storey residential properties to the north west of the application site.
- Cupola features extend to 8 floors on the southern sections of Buildings 2 and 7. These both contravene the Planning Brief and are curious features, and recent additions to the designs, which create rather aggressive geometry and design features in the overall roofscape. We do not concur with their design justification as set out in the D&AS.
- The proposed layout and building heights place many, and large proportions of the external open spaces in permanent shadow.
- In the limited time available since validation of the applications it has not been possible to evaluate the loss of light, and reduction in daylight and sunlight for the existing properties in the north west perimeter to the application site. Officers will need to satisfy themselves of compliance. We would, however, note that the applicant's own EIA provides at paragraph 18.138 that "As would be expected with a development of this scale, there are isolated significant effects to the neighbouring residential properties". An example of this can be found in the detailed data included at Appendix 18.2 which reveal a 40% reduction in VSC and a 62% reduction in NSC to ground floor habitable rooms at certain existing residences on Williams Lane. There are doubtless further examples that officers should scrutinise.
- The three storey units at the western end of the townhouse terrace forming Building 21 are extremely close to the properties on the Thames Bankside and could severely affect their privacy and potentially affect the daylight / sunlight currently enjoyed.
- The Planning Brief specifically requires a reduction in height at the perimeter of the site and along the riverside. The design proposals contravene this aspect of the Adopted Brief. The D&AS and the Town Planning Statement highlight this non-compliance and confirm this aspect of the submitted scheme is not supported by Richmond planning officers. The justification in the D+AS text is very defensive in nature and very unconvincing related to this aspect of the design. We too object to this part of the scheme which is in direct conflict with the Adopted Brief.
- The northern ends of Buildings 7/8/11/12 remain very high at mostly 7 floors over-looking the river. They dominate the riverside and the towpath in an unacceptable manner. They also overpower and dominate the Maltings building. These buildings subsume the Maltings in contravention of SBPB 5.30. Small terrace features and stepping of facades are illustrated on the northern ends of Buildings 8 and 11 but appear a token gesture following planning officer criticisms. These stepped features are diminutive and certainly do not constitute compliance with SPD Clauses 5.30 and 5.31.
- The heights of these buildings (7/8/11/12), when observed from key views on Chiswick Bridge and The towpath by Barnes Bridge create a continuous mass of building form and an unrelieved roofline profile out of character with the more rural broken building form particularly from The Ship to Bulls Alley (see SBPB 5.25 and references to the Thames Strategy). We strongly contest the summary in section 16.33 related to Townscape and Views in the Town Planning Statement.

- The design utilises two building typologies in the eastern half of the site- the 'mansion block' and the 'warehouse' style. These typologies are urban in character and selected precedent examples illustrated in the D+AS which are located generally in more central London areas. Warehouses have historically tended to be on riverside frontages. The few larger residential blocks which exist in the Mortlake area are four storey flats on the High Street with newer contemporary flats between Bulls Alley and Tapestry Court. Cowley Mansions on the High Street are 3 storey blocks.
- The gable ends of the mansion blocks at the upper levels create a rather over-bearing aesthetic with the sloped brickwork features accentuating the height of these taller blocks.
- The Cinema forms an alien and retrogressive design character taking reference to deco cinemas of the 20s/30s yet is located immediately adjacent the more Arts and Crafts style of the Jolly Gardeners.

We strongly disagree with the conclusion and assertions in the Town Planning Statement 13.48.

Section 14 Planning Considerations Public realm, Landscaping and Design of Open Spaces.

The base starting point of the Adopted Planning Brief in relation to Open Space includes the retention of the OOLTI designated sports fields and the creation of the Green Link. These are by definition non-developable areas.

These two large open spaces provide 2.439 ha (6.0 acres) which represents a base 28.30% of the total Stag landholdings.

Any scheme would, in addition, need to provide other landscaped open space, public realm, recreation areas and play areas. The Mayor's strategy to open space and the London Plan both seek to protect existing open landscape, and these features are widely recognised as distinctive aspects of the quality of Richmond Borough's environment. The Mayor's stance on the Greater London National Park City Initiative seeks to protect existing open space and also recognises the importance of landscape in absorbing pollution.

- The applicant and the Town Planning Statement have repeatedly quoted that they exceed the landscape provision in the Adopted Brief. The existing sports fields and the Green Link were however just the base line non-developable provision in the Brief, and other open space was naturally necessary amongst the remaining developable areas.
- The applicant and the Town Planning Statement quote that the size of the Green Link is not quoted in the SBPB, however Appendix 1 of the SBPB clearly identifies the geometry and extent of the Link. The Town Planning Statement and D&AS quote that the size of the primary school site in Appendix 1 is insufficient to accommodate a primary provision. It is not logical to argue inadequacy of areas for the primary school when the applicant has clearly calculated the area of the site from Appendix 1 in the Adopted Brief to make such a statement, but then chooses to argue quite the opposite for the Green Link, suggesting it is an undefined area.
- The Town Planning Statement and the Open Space Report both refer to all the open space in the proposed masterplan (east and west zones), as OOLTI space. This is misleading and a presumption on OOLTI categorisation of all new open space.
- Analysing the open space in the proposed masterplan design this can be divided into several types

4.10 Large open spaces

- Public Park - west zone
- Open Square Buildings 18/19 - west zone

- Green Spine Buildings 13 to 17 - west zone
- Green Link - east zone
- Open Spaces between Buildings 2/3; 7/8; 11/12 - east zone

2.0 Large Hardscape Public Realm

- Maltings Plaza - east zone
- Bottlehouse Square - east zone

3.0 Streets - largely hardscape spaces

- Street for NW Townhouses - west zone
- Street between Buildings 16/18 - west zone
- Thames Street - east zone
- Streets between Buildings 5/10 and 8/11 and 9/10&12.

- The proposed design and application reports combine all of these different areas and quotes that new- so called- OOLTI space comprises over 50% of the whole site.
- We challenge this and have calculated that excluding the school site, the 209 bus reserve, and private townhouse gardens the genuine landscape open space represents just 35% of the Stag site landholdings (8.62ha -21.20acres).
- We point out again that the Adopted Planning Brief provided for a base provision of 28.30% of the developable site.
- We reiterate that Williams Lane, Ship Lane, the towpath, and the link to Mortlake Green are existing infrastructure/space included in the application red line (9.20ha), however, the development site is 8.62ha.
- Technical submissions very clearly indicate that many of the open spaces are either partly in permanent shadow or in shadow for long periods of the day throughout the year. This is as a direct result of factors highlighted earlier in this chapter namely; density, layout and building heights.
- The proposed removal of the existing Sports Fields is in direct conflict with the SBPB and neglects to recognise the very important visual amenity provided by this existing open space to the community, to the local context, and most importantly to the existing residents who live adjacent to the fields and enjoy this aspect to substantial open space.
- Clearly the inclusion of the secondary school and its proposed siting and resultant removal of the existing sports fields has vastly diminished the vision for quality open space in the Adopted Planning Brief. We strongly challenge that the design and development proposals accord with the London Plan and Richmond Council policy nor is compliant with the SBPB.

V4 12.05.18

Chapter 5 - Transport

1. Introduction and Overview

This chapter has been prepared by Howard Potter with valuable assistance from Keith Sowerby on behalf of the MBCG. Both Howard and Keith have career-long senior-level experience of transport planning matters and both are long-standing residents of the local area. This section comprises the following sections:

1. Introduction and Overview
2. Policy
3. Transport Surveys Undertaken by MBCG and NDC
4. Developer Forecasts, Modelling Problems and Chalker's Corner
5. MBCG Forecasts
6. Level Crossing
7. Summary and Conclusions

The following Appendices are at the end of the document

1. MBCG's Manual and Video Surveys
2. MBCG's Forecast of Travel Demand due to the Development
3. Issues to do with the Sheen lane Level Crossing
4. Further Technical Comments
5. MBCG's Letter to local MP Zac Goldsmith

From the transport impact and provision perspectives there is just too much development being squeezed onto what is a severely constrained site given the serious accessibility barriers of the river Thames to the North and the railway just to the south when combined with very poor levels of public transport.

We have **three serious concerns** about the proposals and these are essentially about the transport problems likely to be caused by the **over-development** of the site. The concerns are the large size of the school, the **proposals for widening the Lower Richmond Road approach to Chalker's Corner** and the **lack of any proposed measures to deal with the increased pressure on the Sheen Lane level crossing.**

The inclusion of a c.1250 place secondary school (in place of the far smaller primary school as originally proposed in the agreed development brief) in addition to the high density housing (numbers) and commercial and other uses would add at least 450 – 650 vehicles to the Lower Richmond Road in the peak hour alone. **The lower figure could only be approached if it were possible to restrain car use and enforce this. A school of this magnitude would make up about half this traffic increase in the morning peak and add substantially to the numbers of pedestrians and cyclists**

trying to cross the railway at the acknowledged “high risk” Sheen Lane level crossing. Not only does such a large school seriously compromise the playing fields next to Williams Lane, it also drives up the proposed densities on the remaining land in order to improve the investment returns.

So, with the Council insisting that a major school is included on the Stag site, there is a real danger of seeing a case of seriously bad planning occur on what is undoubtedly a star quality site in the Borough. The eagerness of the Council and the Education and Skills Funding Agency (ESFA) to direct funding to ad hoc site opportunities that may arise regardless of suitability or even agreement is quite frankly extremely concerning in respect of the risks to sound planning and to wasted public expenditure. The new schools (Free and Academies) originally being promoted at the National Physical Laboratories (Turing), London House (A 316 Manor Circus) and, to a lesser extent, the new building for Thomson House (hard by Sheen Lane level crossing) are just a few examples. **This leads us to highlight an important omission in the planning case for the proposed school. That is the absence of a rigorous assessment of alternative sites that surely must include viability and accessibility.**

The second concern we have about the Stag development is the “enabling” proposal to widen and re-align the Lower Richmond Road approach to the Chalker’s Corner and in so doing take trees, green space and parking from Chertsey Court and directing traffic closer to the resident’s windows. The point is that **this scheme will quite obviously increase the attractiveness of the local roads feeding into Chalker’s Corner via Barnes, Mortlake High Street, White Hart Lane and Sheen Lane particularly when the main east-west route the A 205 Upper Richmond Road is congested.** Far better to see the additional traffic generated by the development taking precedence over the “through traffic already using the Lower Richmond Road and so “returning” it to the Upper Richmond Road. The Council is supposed to eschew the principles of sustainable transport and development and yet it seems keen on this undoubtedly expensive and pointless road widening whereas it should seek improvements to public transport, walking and cycling conditions instead – particularly at the level crossing. **The Chalker’s Corner junction complex is a strategic roads issue and not a local one. It should be Transport for London that takes the lead on any scheme here and focus on improving the efficient performance of its own roads - the A316 and the A205.**

The evidence made available about the traffic effects of the Chalker’s Corner proposal from the submitted material supporting the applications appears **inconsistent (and, in particular instances, illogical) and incomplete** as can be clearly shown. Our own evidence will show this and compare our own outline impact assessment. The tests used in the application and presumably agreed with the two highway authorities simply seek to justify the Chalker’s Corner scheme. The Council may be seeking to reduce queuing in Lower Richmond Road and TfL may be seeking to maximise a financial contribution for a scheme even for a change that serves little strategic purpose.

Our third concern is about the significant increase in demand forecast to cross the railway at Mortlake station where safety conditions are already challenging.

The forecast increase in the numbers of pedestrians and cyclists seeking to cross the railway either by the footbridge or at road level is of very serious concern and must be addressed by including some material improvement in safety conditions at the level crossing. No such improvements are proposed to support the development, indeed the Applicants go to considerable lengths to argue that the increased demands will not pose greater risks of accidents. At very least, a significant contribution of the costs of providing this material improvement should be secured through a s.106 agreement.

2. Policy

Where there are proposals to build a high-density scheme with significant numbers of residential units and large schools on a site where public transport is so weak, the focus should now clearly be to improve the PTAL rating rather than to improve general highway capacity. Better still, an **integrated accessibility rating** including accessibility measures for walking and cycling can demonstrate a more accurate rating and reveal the best means of achieving further improvement in overall accessibility so evidently needed in this case. The transport mitigation of development schemes should be assessed on accessibility grounds rather than achieving time savings for car journeys. When very little can actually be achieved (afforded) by introducing additional bus services, then the scale of the development should be reduced.

We note with serious concern that TfL is considering a proposal to cut the 209 services to Mortlake and Sheen as part of their proposal to increase the 485 from Hammersmith to Wandsworth via Barnes. The fact that a key Mortlake bus service is under threat at the very point of a plan to increase the local population is firm evidence of a total lack of joined up, integrated planning and transport.

A new focus should be given to improving active travel accessibility levels and ensuring active travel outcomes by improving walking and cycling conditions and reducing and or pricing on-site parking. It is noted that the major housing scheme taking shape on the Outer London Borough of Barking and Dagenham's Riverside sites provides for 70% residential parking supply per unit. Any parking being provided in structures (basement or multi-storey) should be dimensioned to be convertible to other, non-parking uses. **Travel plans must be followed up and not just put on file after approval.**

The high-level policy objectives enshrined into local planning here and in Richmond and now **particularly in London as a whole** include the encouragement of sustainable transport solutions when development occurs. **This suggests strongly that a partial "improvement" of road traffic capacity at Chalker's Corner runs counter to these policy objectives. The opportunity to improve overall accessibility in the area should be taken by focusing primarily on increasing public transport services and improving conditions for cyclists and pedestrians. The original 2011 planning brief for the site gives particular emphasis to the need for a suitable and sustainable transport solution.**

3. Transport Surveys Undertaken by MBCG and NDC

- 3.1 In recognition of the seriousness of the existing traffic congestion in the area around the Stag Brewery and the clearly evident safety risks around the Sheen Lane Level Crossing, MBCG commissioned manual traffic and related surveys and video surveys. The manual surveys were undertaken by volunteers under the supervision of MBCG's transport advisor. The video surveys were carried out by the professional survey firm NDC commissioned by MBCG. All the surveys were conducted on the 17th and 18th May 2017, a period carefully chosen to be representative of week day conditions.
- 3.2 Both surveys may be compared with transport data collected by other parties interested in this immediate area for a variety of reasons including the Stag Brewery developer, Heathrow Airport expansion, Network Rail and the highway authorities. The summary results of the MBCG surveys including queue length surveys are presented in Appendix 1.

Table 3.4: Video Surveys - Key Statistics at the Level Crossing for the Period 8 am to 9 am

Video Record/Date	17.05.17	18.05.17
Total Number of Trains	23	21
Total Number of Barrier Closures	11	11
Maximum Closure Duration (Mins.)	8.42	8.12
Total Closure Time (Mins.)	44.5	34.7
Average Start Delay (Secs.)	115	95
Average End Delay (Secs.)	17	23
Motorised Vehicles over Crossing (2-way)	449	408
Cyclists over Crossing (2-way)	61	79
Pedestrians over Crossing (2-way)	330	392
Buggies over Crossing (2-way)	22	33
Pedestrians over Bridge	212	272
Cyclists over Bridge	18	19

Comparisons with Other Surveys

A number of studies have been undertaken in the recent past to understand the constraints and opportunities imposed by the local level crossings – **Heathrow Airtrack Environmental Statement by Temple Group Consultants for Heathrow Airport Limited, 2010**. It is noted that this report shows evidence of the significant proportion of traffic flow across the local level crossings is non- local, demonstrating the congestion pressures on the strategic highway network in the wider area.

Southern Rail Access to Heathrow Feasibility Study by Network Rail December 2015

Mortlake Level Crossing Narrative Risk Assessment by Network Rail, July 2017

These studies are consistent in their findings in relation to movement demands, forecasts and capacities. **Currently, there are no realistic solutions available to satisfy all the competing demands as there are no near-term prospects for increasing train frequency or road capacity. Solutions do however exist to increase pedestrian and cycle capacity and safety conditions but there is no scheme being developed.**

4. Stag Brewery Developer Forecasts.

4.1 The forecasts prepared by the Developer's transport consultants PBA were presented at the exhibition in July 2017. These forecasts are for **vehicular** traffic and suggest a directional distribution of approximately 47% to/from the Lower Richmond Road, 33% to/from Mortlake High Street and just 17% to/from Sheen Lane. The **total** am peak hour flow increase forecast at that time was just less than 400 arrivals and departures. Since then, the documents submitted to support the planning application reveal that the

TRANSPORT INTERVENTIONS

The transport strategy is generated to tackle the identified issues currently, and anticipated number of journeys.

Based on trip rates agreed with TfL and LBRuT it is anticipated that the development would generate just less than 400 vehicle trips during morning peak, and 250 during PM peak hour. Half of the AM trips are related to the school. Detailed trip estimations are shown on the map on the right.

Other considerations include the fact that:

- the brewery generated over 500 daily, including a high proportion of HGV
- the inclusion of local facilities in the Stag development, including school, local jobs, retail and leisure, will reduce the need to travel outside the area.

TRIPS	EXISTING	PROPOSED
AM	100	200
PM	100	100

TRIPS	EXISTING	PROPOSED
AM	100	100
PM	100	100

TRIPS	EXISTING	PROPOSED
AM	100	100
PM	100	100

forecast increase is now 427 including 56 heavy goods vehicles. **This forecast now moves closer to the higher figure estimated by the MBCG (see below).** Changes were also made to the directional distribution resulting in 43%, 31.5% and 25% respectively in Lower Richmond Road, Mortlake High Street and Sheen Lane.

4.2 These changes partly reflect minor changes in the proposed development schedule, but the distribution changes are assumed to be caused by largely unexplained variations in the traffic modelling outputs.

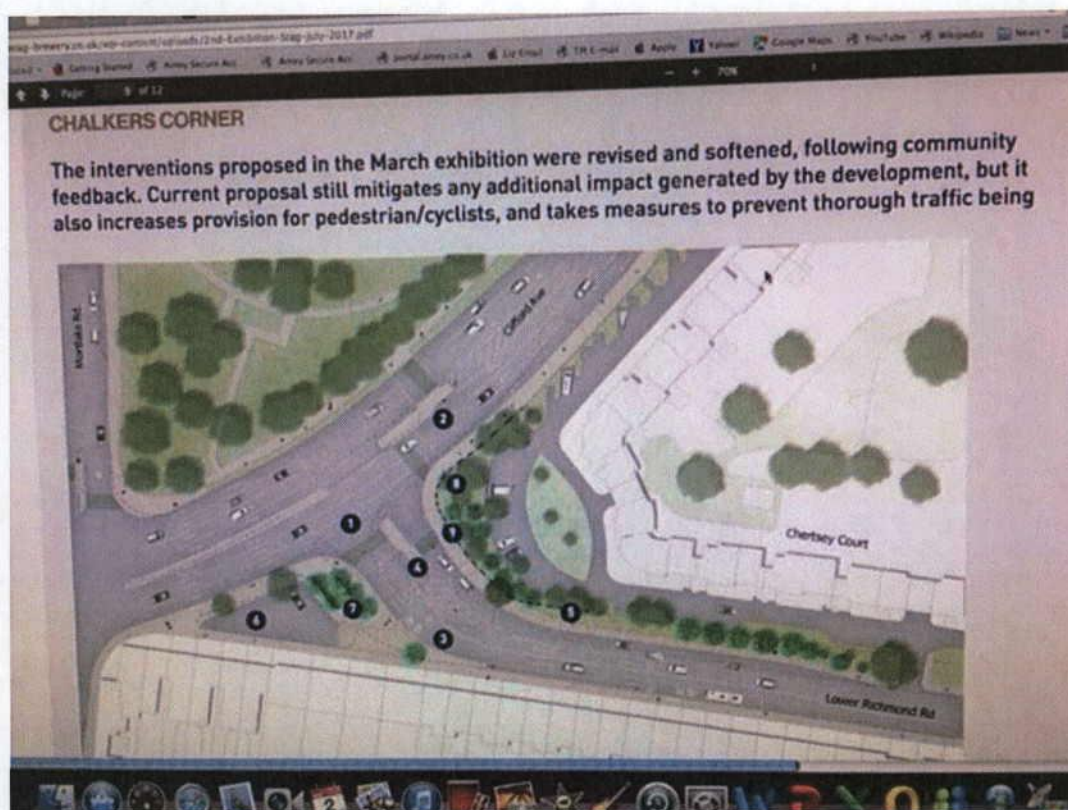
Traffic Modelling Problems and Chalker's Corner

- 4.3 PBA acknowledge that there have been problems using the strategic traffic model as requested by Transport for London. Altogether four types of model have been used – the strategic model (SolHAM prepared by TfL but amended by PBA to achieve a clearly necessary improved local validation), the industry standard LinSIGs, a VISSIM model and the industry standard junction models. The VISSIM modelling (PBA TA p.92) and indeed the standard junction models are used only as a design tool and not as a means of assessment. The limitations of the VISSIM modelling are acknowledged in the Transport Assessment, Appendix S para. 1.3. **We would agree with PBA that the LinSIGs are judged to be better than SolHAM.** This latter point is made clear at various points within the text of the TA. The future scenario **tests run via SolHAM include approximately 9% more traffic as background growth to 2031. When combined with the new development traffic, this model produces certain surprising but unexplained results** (see Tables 4.5 and 4.6 in the Information Note to Appendix N in the TA). **The model outputs for future traffic around the site show some reductions on the Lower Richmond Road when the development traffic is added and then increases when the Chalker's Corner scheme is added. There is clearly a problem with model instability as admitted by PBA.**
- 4.4 Para. 7.2.7, page 113 of the TA mentions **the key objective as being not to increase traffic on the Lower Richmond Road** and yet Tables 7.1 to 7.4 display forecasts that indicate significant increases when the mitigation measures at Chalker's Corner and along the Lower Richmond road are introduced. Para. 7.6.3 suggests that the signal timings at Chalker's Corner can be modified when the new scheme is introduced presumably to deter excessive traffic growth in the Lower Richmond Road. This could be done but only with the expectation of the formation of longer queues.
- 4.5 From Table 7.4, page 119, further evidence is revealed from the LinSig tests of the Chalker's Corner performance under different conditions. These reveal that the junction is seriously over capacity by 2031 but that the proposed capacity increase created by the widening of the Lower Richmond Road approach can just about handle the background growth and the new traffic generated by the Stag Brewery development. The Degree of Saturation (DoS) results shown in this Table tell us that **once the Chalker's Corner scheme is implemented all the approaches to the junction complex are broadly saturated with the exception of the Lower Richmond Road arm. This outcome would almost certainly attract additional through traffic along the Lower Richmond Road/Mortlake High Street/ Barnes Terrace route as the MBCG has predicted throughout the pre-application period.**

Examples of missing traffic modelling tests include;

- 4.6 Given the likely extended time-frame for site completions and full occupation and the apparent "interdependency" of the Chalker's Corner proposal, it is necessary to see a much more comprehensive set of transport forecasts and methodologies and to better understand the significant variations in the forecasts already made. Examples of missing test forecasts include:
- Opening years (for example 2020-27) tests with background growth and with and without development

- Ditto with and without Chalker's Corner
- Ditto without the school
- Additional junction model tests involving future (2031) base flows with development traffic added manually.



5. MBCG's Forecasts

Overall Trip Generation

- 5.1 The provisional total MBCG forecast vehicular am peak hour traffic generated by the development is significantly higher (470~710 – see Table 5.1) than that envisaged by the developers - now 427. The latter forecast has increased since the original ones prepared and comes closer to MBCG's low forecast. The MBCG forecasts used in its assessments below **exclude** the traffic generated by the other, relatively minor, land uses proposed because of their **lack of definition**. However, if a net gain in jobs forecast by the applicant (Employment Assessment, para.6.1) is realised, some 352 full time equivalent jobs are likely to attract some 50 to 85 additional car trips to the site in the morning peak hour ($352 \times 0.5 \sim 0.66$ {factors for social hours worked} $\times 0.36$ {work journey car mode} = 63~85).

Table 5.1: Provisional MBCG Total Motorised Vehicle Forecast for the 8 – 9 am Period

Land Use	Low Forecast	High Forecast (TRICS)
Housing	170	310
School	c.300 with an effective travel plan	400 (London sites)
Totals (used in MBCG assessment)	470	710
Other Uses	c.63	c.85

- 5.2 From this comparison of the new traffic generation forecast by the Applicant and by MBCG it can be seen that there is a significant difference. Rather than the Applicant’s forecast being claimed to be “robust”, MBCG claim that it is potentially a significant underestimate.

Directional/Distribution Assumptions

- 5.3 *Distribution for Pedestrians/Cyclists/public transport users* - North of River via the Lower Richmond Road 10%, South via Sheen Lane 50%, East 20%, West via the Lower Richmond Road 20%. We recognise that there are two additional footbridges over the railway within 500 metres of Sheen Lane but consider that the Sheen Lane level crossing is far more attractive for the large majority of pedestrians as it avoids steps, provides access to local facilities and is relatively secure. This will particularly apply to the large majority of school pupils who like to walk in social groups. For **motorised vehicles**, a lower proportion of overall demand is assumed to use Sheen Lane. A proportion of 33% is assumed which is greater than the PBA assumption of 25%. The Sheen Lane route provides the shortest access route to points East via the A205 South Circular Road compared with the alternatives. This is particularly the case in off peak periods when the level crossing barriers are open for longer periods.

Trip Distribution

- 5.4 We find no simple explanation by the Applicant of vehicle trip distribution – there is a single SATURN output diagram in Appendix N that is unreadable even if zoomed in. It appears to show significant numbers of trips through Barnes, but it would be more interesting to know precisely how many trips use each route.

6. The Sheen Lane level Crossing

6.1 Table 6.1: MBCG and Applicant's (PBA) Forecasts Compared

Movement Type	Existing Demand (average of 2 survey days)	Existing Ground level and Bridge Total	Stag Brewery Demand (MBCG provisional)	Stag Brewery Demand (PBA)	Total Demand	% Increase
Pedestrians Crossing at Ground Level and using Footbridge	c.361 at Ground Level. c. 242 on Footbridge	603 (MBCG) 387 (PBA)	409 including footbridge	94 and 119 = 213 TN 18 Table 4.6	1012 (MBCG) 283 and 304 = 587~600 (PBA)	68 (MBCG) 52 (PBA)
Cyclists crossing at Ground Level and using Footbridge	c.70 at Ground Level. c. 24 on Footbridge	c.94 (MBCG)	66 including Footbridge	?	160 (MBCG)	70 (MBCG) ?(PBA)
Vehicles over the Crossing	428 MBCG) 491 (PBA)		187~233 (MBCG)	71 (Table 4.2)	615~661(MBCG) 562 (PbA)	44~54 (MBCG) 15 (PBA)

6.2 It should be noted that there is a significant difference between the video counts of both vehicles and pedestrians taken by MBCG and those provided by the applicants. The smaller differences in vehicle movements are to be expected as conditions do change from day to day but the pedestrian count differences are rather more significant and warrant explanation.

6.3 **The forecast increase in the numbers of pedestrians and cyclists seeking to cross the railway either by the footbridge or at road level is of very serious concern and must be addressed by including some material improvement in safety conditions at the level crossing.**

7 Summary and Conclusions

Policy

Throughout London the transport policy emphasis is being given to improving active travel accessibility levels and ensuring active travel outcomes by improving walking and cycling conditions and reducing and or pricing on-site parking. The intentions of the original 2011 Planning Brief for this development was to apply a suitable and sustainable transport solution. This is not being delivered with this proposal where emphasis is still being given to providing ample car parking and road capacity increases.

Current Transport Conditions

There is more than enough evidence prepared by the highway authorities, TfL, Network Rail, the Applicants of this development and MBCG that clearly demonstrates the high levels of congestion already on the local and strategic transport networks in the area. The barriers created by the river Thames and the railway serve to add to the problem. The level of public transport provision is extremely weak for an area that should enjoy better rail and bus services to raise its accessibility closer to those of surrounding areas. The local congestion is, in itself, a constraining factor in achieving this.

Transport Demand Forecasts due to the Development

From this comparison of the new traffic generation forecast by the Applicant and by MBCG it can be seen that there is a significant difference. Rather than the Applicant's forecast being claimed to be "robust", MBCG claim that it is potentially a significant underestimate.

The School

A school of this magnitude proposed would make up about half this traffic increase in the morning peak and add substantially to the numbers of pedestrians and cyclists trying to cross the railway at the acknowledged "high risk" Sheen Lane level crossing. Not only does such a large school seriously compromise the playing fields next to Williams Lane, it also drives up the proposed densities on the remaining land in order to improve the investment returns.

Chalker's Corner

If the Chalker's Corner scheme is implemented all the approaches to this junction complex are forecast to remain saturated with the exception of the Lower Richmond Road arm. This outcome would almost certainly attract additional through traffic along the Lower Richmond Road/Mortlake High Street/ Barnes Terrace route as the MBCG has predicted throughout the pre-application period.

Sheen Lane Level Crossing

The forecast increase in the numbers of pedestrians and cyclists seeking to cross the railway either by the footbridge or at road level is of very serious concern and must be addressed by including some material improvement in safety conditions at the level crossing. No such improvements are proposed to support the development. Indeed the Applicants go to considerable lengths to argue that the increased demands will not pose greater risks of accidents. At very least, a significant contribution of the costs of providing this material improvement should be secured through a s.106 agreement.

Chapter 6 - Green Spaces

This chapter responds to the points raised in the ES annexure entitled Open Space and Playing Pitches Assessment.

Chapter 5B - Open Space and Playing Pitches Assessment (Gerald Eve)		
	Stag Brewery Mortlake	
	Environmental Statement (ES) – Open Space and Playing Pitches Assessment	Comments by Mortlake Brewery Community Group
1.	Executive summary	
1.3	Existing situation	<p>The pitches are also capable of use, as they have been in the past been used, for cricket.</p> <p>Use only 'approximately 30% of the year' is unclear – presumably this means use for sports, as they are used for other purposes and to support ecosystems year-round.</p> <p>30% in any event does not marry up with a football season, if that is the intention – that would be around 50%-60%.</p> <p>It is acknowledged that, if made available to the community, such as local schools including nearby Thomson House primary school, whose pupils currently have to use Mortlake Green for lower-school sports (i.e. 4 to 7-year olds), which is not fenced off and a risk to health - use could be significantly higher. This is a requirement of the SBPB.¹</p>
1.4	SBPB	<p>The reference to the document being 'guidance' only is misleading. It is a supplementary planning document, with statutory weight, and therefore a material planning consideration.</p> <p>Evidence of ESFA's stated position should be provided. To the contrary (i) reinforced grass would be a satisfactory alternative but moreover (ii) we are aware that ESFA has, in other sites, recently accepted grass pitches.</p> <p>Applicant to evidence its assertions.</p>

¹ "The Council will seek the retention of the two existing football pitches/one cricket pitch for increased public use (DM OS8)."

Chapter 5B - Open Space and Playing Pitches Assessment (Gerald Eve)		
	Stag Brewery Mortlake	
	Environmental Statement (ES) – Open Space and Playing Pitches Assessment	Comments by Mortlake Brewery Community Group
		It should also be noted that, until the development of the Williams Lane / Wadham Mews development in 2010/2011, Mortlake also benefitted from bowling greens of national repute. With that development, being undertaken at the time the APB was being produced, Mortlake lost a material part of its open, green, amenity space – which heightened the need for the community to retain its remaining valuable space.
1.5	Implications of requiring a new secondary school	This statement is incorrect. The October 2015 minutes evidence adoption of a six-form entry school only – there is no reference to a sixth form. To the contrary, at para. 5, those minutes refer to the continued need for primary schools.
1.7		'All options considered involve...'. Applicant to advise why options involving instead a reduction of residential units, that did not require loss of grass, were not considered?
1.8		'... the quantum of built development proposed on the current playing fields is approximately 0.2ha.' This appears incorrect. Applicant to define 'built' and evidence. Our calculations point to the school buildings and associated fringes occupying a larger area.
1.9		We agree that, if indeed a large secondary school is required on the site – which is certainly not accepted – this represents the optimal location, save that it could be moved further east to avoid any building on greenfield land, per the SBPB. It may only be feasible to achieve this by a reduction in some proposed residential use.
1.11	Open space	'The re-distribution meets the policy tests relating to quantum, quality and openness'. This is vehemently disputed – see further below - as is the statement that the vast majority of 'qualifying' space is 'fully accessible to the public': access to the school confines (including 3G pitch and MUGA) will be heavily restricted by the community access agreement (draft appended to the report), the houses will have private gardens and the courtyards will be quasi-private in practice. Pathways are not OOLTI. A bus park, for which a large area of the playing fields has been ear-marked, clearly is not OOLTI. See further 7.15 below.
1.14 / 1.15	Play/sports provision	The Sport England rules have been applied only to assess (i) grass versus (ii) 3G. They have not been applied to assess a reinforced grass alternative, which (through the

Chapter 5B - Open Space and Playing Pitches Assessment (Gerald Eve)		
	Stag Brewery Mortlake	
	Environmental Statement (ES) – Open Space and Playing Pitches Assessment	Comments by Mortlake Brewery Community Group
		<p>retention of two pitches, instead of one floodlit pitch) would also materially increase capacity for usage. This alternative carries additional benefits of on-going cost-savings (versus floodlighting) and allows the natural character, flood prevention and eco-friendly characteristics of grass to be substantially preserved.</p> <p>Critically, Sport Richmond's views whom we understand will be objecting to the 3G proposal, also need to be consulted upon – see below.</p>
1.17	Conclusion	'All criteria... satisfied by the proposals' and following statements. Strongly disputed – see further below.
2	Introduction	
2.6	Scope of report	<p>As stated, the report covers the loss of designated open space and the loss of sports pitches.</p> <p>However, it does not address the wider body of relevant considerations relating to building on greenfield land rather than brownfield.</p> <p>Chapter 7.18 of the current London Plan provides: "<i>The loss of protected open spaces must be resisted unless equivalent or better quality provision is made within the local catchment area. Replacement of one type of open space with another is unacceptable unless an up to date needs assessment shows that this would be appropriate.</i>"</p> <p>See also re London Plan chapter 3.19 below.</p> <p>In relation to the National Planning Policy Framework, the following areas are of particular importance:</p> <ul style="list-style-type: none"> • Section 10: Meeting the challenge of climate change, flooding and coastal change (paragraphs 93 to 108). • Section 11: Conserving and enhancing the natural environment (paragraphs 109 to 125).

Chapter 5B - Open Space and Playing Pitches Assessment (Gerald Eve)		
	Stag Brewery Mortlake	
	Environmental Statement (ES) – Open Space and Playing Pitches Assessment	Comments by Mortlake Brewery Community Group
		<p>The key relevant points from these documents are:</p> <ul style="list-style-type: none"> • The planning system should enhance the <u>natural</u> environment • Planning policies should encourage the re-use of brownfield land, provided the land is not of high "environmental value". • The local authority may seek to achieve remediation through planning conditions or planning obligations (see Practice note, Planning applications: an overview: Planning conditions and Planning obligations toolkit). • The overall objective of the planning regime is to contribute to and enhance the natural and local environment. Planning should recognise the intrinsic character and beauty of the countryside. The NPPF reflects the Natural Environment White Paper for England. • The planning regime should recognise the wider benefits of ecosystem services and minimise the impacts on biodiversity. • Local planning authorities should set out a strategic approach in their local plans, which actively plans for the creation, protection, enhancement and management of biodiversity networks and green infrastructure. The proposals here would be at odds with those in the draft Local Plan (see discussion below) • Local planning authorities should aim to conserve and enhance biodiversity when deciding whether to grant planning permission. • The planning practice guidance explains how biodiversity should be taken into account in preparing planning applications. • The NPPF requires significant harm to biodiversity to be first avoided, then mitigated and finally compensated. The planning practice guidance explains how that mitigation hierarchy should be applied. Local planning authorities can use planning obligations and planning conditions to achieve mitigation or compensation. • The NPPF encourages the re-use of brownfield land, unless it has a high environmental value (see Land contamination toolkit: Brownfield land). • Planning permission should be refused in the following circumstances:

Chapter 5B - Open Space and Playing Pitches Assessment (Gerald Eve)	
Stag Brewery Mortlake	
Environmental Statement (ES) – Open Space and Playing Pitches Assessment	Comments by Mortlake Brewery Community Group
	<ul style="list-style-type: none"> o if the development will result in significant harm to biodiversity that cannot be avoided (by locating the development on an alternative site with less harmful impacts), adequately mitigated or, as a last resort, compensated for; o if the development will result in the loss or deterioration of irreplaceable habitats, unless the need for, and benefits of, the development in that location clearly outweigh the loss; o if a development on land within or outside an SSSI is likely to have an adverse effect on an SSSI (either individually or in combination with other developments), unless the benefits of the development clearly outweigh the impacts; or o for major development in a National Park, the Broads or an Area of Outstanding Natural Beauty, except in exceptional circumstances and where it can be demonstrated to be in the public interest. <p>The bottom line is that building on greenfield sites, instead of brownfield, should be a last resort - not simply something to improve the applicant's profitability and returns. There are alternatives here. These protected playing fields do not need to be ceded to large-scale development.</p> <p>The draft Local Plan also makes protection of playing fields a priority, with which the applicant's plans would be inconsistent, where it states (at LP31):</p> <p><i>"Public Open Space, children's and young people's play facilities as well as formal and informal sports grounds and <u>playing fields will be protected, and where possible enhanced</u>. Improvements of existing facilities and spaces, including their openness and character and their accessibility and linkages, will be encouraged"</i> (Emphasis added).</p> <p>Further, the playing fields provide a form of flood defence in a flood level 2 risk area. The planning practice guidance on flood risk and coastal change includes guidance on:</p>

Chapter 5B - Open Space and Playing Pitches Assessment (Gerald Eve)		
	Stag Brewery Mortlake	
	Environmental Statement (ES) – Open Space and Playing Pitches Assessment	Comments by Mortlake Brewery Community Group
		<ul style="list-style-type: none"> the sequential test, which seeks to ensure that a sequential approach is followed to steer new development to areas with the lowest probability of flooding; and the exceptions test, which requires proposed development to show that it will provide wider sustainability benefits to the community that outweigh flood risk, and that it will be safe for its lifetime, without increasing flood risk elsewhere and where possible reduce flood risk overall. <p>To be confirmed whether such issues have separately been properly addressed.</p>
2.7		Pre-application advice should be disclosed.
2.8		The reference to a new <u>village</u> heart for Mortlake is noted. However, constructing a large secondary school, and replacing grass with plastic, is not consistent with village planning. The SBPB is very clear about creating a <u>village green</u> feel – where does that appear in the applicant's plans?
3	Existing situation	
3.1		The land in question (i.e. the 2.06ha) is just the playing fields, not the full OOLTI area which includes the sports pavilion and changing room. See 7.13 below.
3.3 / 3.4		The fields are also presently – presumably with consent – used by the police to train dogs. Also for the Mortlake summer fair, in addition to Barnes Eagles as the main user.
3.5	Key message 3A	<p>Significant under-use is acknowledged. However, with a licence to use and/or municipal ownership of the type proposed by the applicant and reinforced grass, community use could be significantly higher. The SBPB requires community use, so this should be the 'base case'.</p> <p>This also does not take account of use by a plethora of wildlife whose ecosystems interact with those at the nearby riverside. The scope of the EIB is challengeable, to the extent it does not cover this.</p>
4	Adopted Stag Brewery Planning Brief (SBPB)	



Chapter 5B - Open Space and Playing Pitches Assessment (Gerald Eve)		
	Stag Brewery Mortlake	
	Environmental Statement (ES) – Open Space and Playing Pitches Assessment	Comments by Mortlake Brewery Community Group
4.1 / 4.2		<p>Reference to '<u>guidelines</u>' is not appropriate. As an SPD, the document is a material planning consideration. The purpose of such documents is to provide clarity to stakeholders as to the basis on which development will (or will not) occur. It sets out, in its own words, a clear vision for the site and uses clear words as to what will be delivered – it talks clearly of expectation with respect to any planning application that may be forthcoming.</p> <p>Can the applicant please explain why it does not form part of the statutory Development Plan? As a supplementary planning document, it is provided for by statute (the Planning and Compulsory Purchase Act 2004) and whose importance is enshrined by the draft Local Plan (which will itself form part of the statutory Development Plan).</p> <p>This statement is therefore materially incorrect.</p>
4.3		The small primary school is shown in the <u>north west</u> of the site, not the south west as stated.
4.4		For completeness, the SBPB explicitly provides for the retention of the two playing fields for football and/or cricket. We understand that Cricket cannot properly be played on a 3G pitch of the type proposed.
4.8		<p>Squire and Partners' transposition is materially inaccurate as regards the land to the north of the playing fields. For this area, the SBPB sets out two things:</p> <ul style="list-style-type: none"> • a block of colour; and • a conclusion that this area should be low-level residential of up to three storeys (except for the school, which would be of one to two storeys in height). <p>The plan was predicated on the basis of the barefoot consultation (referenced in the SBPB, and therefore admissible as evidence) which provided for this area to have a density of 50 to 60 units per hectare. S&P have therefore erred at Appendix 3 by purporting to fill that area with buildings of three storeys in height – that is simply not what the SBPB, taken in its entirety, requires.</p>

Chapter 5B - Open Space and Playing Pitches Assessment (Gerald Eve)		
	Stag Brewery Mortlake	
	Environmental Statement (ES) – Open Space and Playing Pitches Assessment	Comments by Mortlake Brewery Community Group
4.10		Absent any clarity in the brief, this is conjecture.
4.11	Key message 4A	<p>As noted above, this is conjecture.</p> <p>To the contrary, the trees in the section of the field on which the applicant envisages building are subject to TPOs. As such, that is unlikely to have been the intention. As such, the more likely conclusion is that the appendix to the SBPB provided a broad indication of uses which should be read in tandem with the other provisions of the SBPB (as para 4.12 goes on to suggest). Therefore, the outline areas, the presence of TPOs and the <u>explicit statement requiring retention of the playing fields</u> would mean it much more likely that <u>no building was intended to take place on the fields</u> – although we acknowledge there may have been an intention for the school to use the retained fields.</p>
4.12		It is unclear what this statement is saying. Can the applicant clarify or omit?
4.13	Need for hard space / sports pitches	<p>Please provide evidence that Cushman Wakefield are appointed as the ESFA's agents?</p> <p>There is a statement that 'any type of school' would require an artificial pitch. The quotation then goes on to reference only a 'secondary school'. It does not automatically follow that a primary school could not have a grass field – to the contrary, we believe there to be at least one new primary school that it is proposed will have a grass pitch. Looking at the text of the quotation, this supports a conclusion that a primary school of the type the community continues to require, could allow for protection of the grass pitches.</p> <p>The meaning of 'artificial' is not explored in the limited quotation provided. This appears to be a use-based conclusion. If so, why has the option of reinforced grass (which we understand is favoured by Sport Richmond – see below) has not been considered? ESFA should be asked to consider this alternative, to the extent within its remit and not ultra vires.</p>

Chapter 5B - Open Space and Playing Pitches Assessment (Gerald Eve)		
	Stag Brewery Mortlake	
	Environmental Statement (ES) – Open Space and Playing Pitches Assessment	Comments by Mortlake Brewery Community Group
		Finally, Cushman’s statements disregard the fact there are already grass pitches in situ – this is not simply a case of building on brownfield land, it would involve destroying good grass pitches and the plethora of wildlife that inhabits or relies upon it - of which there is much, but seemingly no report. LBRuT to require report to examine interaction between playing fields and ecosystems (including riverside) and flooding.
4.14		The statement that ' <i>a proportion of the grassed playing fields would need to be given over to hard play / sports surfaces</i> ' simply does not follow. The grass pitches could be retained in addition to a hard surface play area. See also comments above re use of reinforced grass as an artificial alternative. A smaller school would facilitate this and have a smaller space requirement.
4.15		The statement that Appendix 6 is 'demonstrating a significant area of the existing playing fields which could not be retained' does not automatically follow. First, as noted above, grass pitches can be used for primary schools. Secondly, the hard space requirement could have occupied another area of the site. The SBPB contemplated low to medium density residential, so the expectation was not that the whole of the 'residential' areas would be filled to bursting point with resi units.
4.16	Key message 4b	<p>Although arguable, this conclusion has been reached on erroneous assumptions. There is every chance that the brief could have resulted in the retention of the playing fields contemplated by the SBPB.</p> <p>It should also be noted that the SBPB expressly stated: " 5.40 <i>It may be possible to share the use of the pitches with a school although it is recognised that pitches have a finite capacity.</i>" This is a clear indication, when read alongside the statements cited herein that the pitches will be retained, that whilst it was felt the pitches may be used by the school, owing to capacity constraints <u>additional</u> playing space may need to be provided on the site. The applicant does not appear to have considered this aspect of the SBPB.</p>
5	Implications of Requiring a New Secondary School	

Chapter 5B - Open Space and Playing Pitches Assessment (Gerald Eve)		
	Stag Brewery Mortlake	
	Environmental Statement (ES) – Open Space and Playing Pitches Assessment	Comments by Mortlake Brewery Community Group
5.2 / 5.3		From our knowledge of sales processes, we would dispute the statement that ' <i>Whilst contracts were formally exchanged after the Cabinet Committee decision, at this late stage of the purchase process there was no opportunity to revise or amend bids given that the bidding process had been completed, and a preferred bidder selected for the purchase. Instead, it was determined that any future policy change to require a secondary as opposed to primary school would be discussed during formal preapplication discussions.</i> ' Until the purchase agreement is signed, there is no legally binding obligation to acquire the site. Even legally binding bids are typically explicitly stated to be subject to diligence, material adverse change, etc.
5.5		<p>This is acknowledged. However, the purpose of the statement is unclear. It appears to indicate that a primary school remains the only adopted planning policy. If that were to be the case (see comments on Local Plan) we would agree that the proposal for a primary school should be retained in lieu of an over-sized secondary school.</p> <p>LBRUT's emerging site allocation planning policy for the Stag Brewery site, which proposes to confirm this amended education provision, remains subject to legal challenge, both through the examination process and judicial review on the basis of one or more of the following non-exhaustive factors:</p> <ol style="list-style-type: none"> 1. Mistake of fact and law relating to forecast supply and demand 2. Mistake of law as to the Council's duties under s.14 Education Act. 3. Failure to consider appropriate alternatives to a large new school and, to the extent there was a consideration (which only followed after the Cabinet Committee and commencement of the site allocation plan process), the decision was taken on the basis of a failure to consider material planning factors (including environmental impact, traffic and anticipated catchment given proximity to Hounslow and Hammersmith). 4. Procedural impropriety
5.6		See comments on previous section
5.7		The statement that 'This is acknowledged within the emerging site allocation policy, which refers to retention or re-provision of playing fields.' is inaccurate. From discussions at the Local Plan examination, the suggestion was not that the Local Plan

Chapter 5B - Open Space and Playing Pitches Assessment (Gerald Eve)		
	Stag Brewery Mortlake	
	Environmental Statement (ES) – Open Space and Playing Pitches Assessment	Comments by Mortlake Brewery Community Group
		pre-empts what will or will not be required. Rather, the reference to 'reprovision' was intended to tie the SA24 playing fields into the OOLTI exemptions. This is evidenced by the subsequent revisions to the draft Local Plan.
		<p><i>'The CLG sessions are attended by representatives of various local organisations. One CLG session focussed specifically on matters relating to the new school, impacts on playing fields and replacement facilities and reprovision.'</i></p> <p>There was very little discussion of matters relating to the new school, save that the applicant made clear the Borough's position meant its hands were tied. There was little or no discussion of re-provision.</p>
5.8 to 5.40	Consideration of locations on the Site for the school	<p>The consideration of alternative locations within the Site is considered to have been thorough, although as noted above there has been no consideration of reducing residential use in favour of protecting the playing fields. It also broadly reaches a conclusion acceptable to the group, namely that (of the options considered) it allows a degree of openness, it has broad community support, it keeps most of the school and residential units off the playing field and causes least disruption to local residents. However:</p> <ol style="list-style-type: none"> 1. As per comments above, a reinforced grass solution would allow the retention of two 'grass' pitches, which would in turn allow the Borough to be consistent with the requirement in the SPBP to retain the playing fields, as well as the NPPF, Local Plan and London Plan which advocate the protection of greenfield land and ecosystems; 2. That would also protect openness to a greater degree – there would presumably still be some new fencing preventing unobscured views
5.32		Why has the applicant focused on providing two full-sized pitches? The stated requirement is to support the secondary school, so the retention of the two youth-sized pitches would appear more appropriate. It would appear possible to have one full-sized pitch and one youth pitch.

Chapter 5B - Open Space and Playing Pitches Assessment (Gerald Eve)		
	Stag Brewery Mortlake	
	Environmental Statement (ES) – Open Space and Playing Pitches Assessment	Comments by Mortlake Brewery Community Group
5.41	Summary	<p>See comments at 5.40. The conclusion reached, although we consider it broadly the correct one, is based on the following incorrect statements (unless otherwise stated, for the reasons stated in comments on sections 4 and 5 above):</p> <ol style="list-style-type: none"> 1. The existing playing fields would not be retained in their existing form in either a primary or secondary school scenario as school play/sports requires a more robust surface to enable intensive use; 2. Various options for the school location have been extensively considered. On the basis that the existing playing fields would not have been fully retained under any redevelopment proposal, the options considered involve development on the playing field land 3. Locating the school in the proposed location (Option 4), as shown on the masterplan, enables ... retention of the open aspect of this part of the site (and re-provides OOLTI, including a new public park) – see comments in sections 6 & 7 on OOLTI . <p>If these statements had been properly considered, a more cost-efficient option, we understand supported by Sport Richmond, involving the retention of two reinforced grass playing fields would have been viable.</p>
5.42	Key message 5b	As detailed above, we consider it feasible to retain the grass playing fields in full. Further, a smaller secondary school or primary school would facilitate this.
5.43		<p>The reference to 0.2ha is incorrect. The OOLTI space is larger (0.26 by the applicant's calculations cf. section 7.13), as it includes the sports pavilion.</p> <p>Moreover, this disregards the significant area constituted by pathways, borders and hard surfaces in addition to the main school building. Refer to the area shaded beige in Appendix 12. It also appears to include pathways, which will not be green spaces. These areas materially increase the amount of OOLTI land being built upon.</p>
6	Relevant Planning Policy: Open Space	
6.1		As stated, the report covers the loss of designated open space and the loss of sports pitches. However, it doesn't address the wider body of relevant considerations

Chapter 5B - Open Space and Playing Pitches Assessment (Gerald Eve)		
	Stag Brewery Mortlake	
	Environmental Statement (ES) – Open Space and Playing Pitches Assessment	Comments by Mortlake Brewery Community Group
		relating to building on greenfield land rather than brownfield, such as under the NPPF and London Plan. See above at 2.6 for full commentary.
6.5		In relation to the draft LBRuT Local Plan 'publication version', attention is drawn to the proposed modifications to such plan which have subsequently been consulted upon. These specifically cover the playing fields at SA24 and the OOLTI re provision criteria.
6.12		See comments under 6.5 above in relation to the status of the draft Local Plan. Adoption is not expected in spring 2018.
6.18		See comments under 6.5 above in relation to the status of the draft Local Plan, which has amended SA24.
6.19		The SBPB specifically notes: "Consideration has been given to whether there would be any benefits from the relocation of this space and the Council's conclusion (supported by the public) is that it must be retained in this location, and made more accessible for public use." Thus, the suggestion that the applicant is going 'above-and-beyond' what is required in relation to this space is incorrect: this was a requirement of the supplementary planning document to which the site was subject when it acquired it.
7	Assessment: Open Space (Main Site)	
7.1		The statement that ' <i>OOLTI is land which has value as green infrastructure and townscape amenity value</i> ' is not supported. Whilst this statement is not disputed, OOLTI may clearly have additional attributes which justify its designation in line with DM OS 3 and the draft Local Plan.
7.2		See comments under 6.5 above in relation to the status of the draft Local Plan. Representations have been submitted to request clarification of this provision in line with discussions with LBRuT, namely to clarify that any re-provisioned OOLTI land must be in addition to that which would otherwise have to be provided under then-current planning policies. This must be the case, otherwise there would be no benefit to including the criteria which must be met to achieve re-provision.
7.5		The tests of quantum, quality and openness stated are those under the draft Local Plan which, as noted remains subject to on-going modification. This should also reference the extant DM OS 3 tests, which the report should go on to assess.

Chapter 5B - Open Space and Playing Pitches Assessment (Gerald Eve)		
	Stag Brewery Mortlake	
	Environmental Statement (ES) – Open Space and Playing Pitches Assessment	Comments by Mortlake Brewery Community Group
7.9		This is misleading and hypothetical. A detailed analysis of the relevant areas of the site which the applicant proposes are capable of OOLTI designation would need to be undertaken at the time of the next Local Plan (or neighbourhood plan). For instance, it is extremely unlikely that a private garden would be given OOLTI status, notwithstanding that it is of a type which, if it were to meet the other criteria, could in theory be so designated.
7.11		It is unlikely that the proposed school play facilities will 'allow for long views into the site, including from surrounding properties.' Fencing and netting plus, if implemented, a bus turnaround will prevent this.
7.12		Is the reference to 'these elements' intended to pick up just the 3G pitch? Or more? In any event, as stated above, this is hypothetical absent a detailed assessment against applicable criteria at the relevant time.
7.13	Quantity	"We consider that these elements do not constitute qualifying OOLTI and should therefore be removed from the existing qualifying area". The applicant's assertion is incorrect. First, the designated area shown in LBRuT's plan is very clear, so to suggest it should in some way be construed to exclude one or more parcels is ludicrous. Secondly, if one looks at the DM OS 3 guidance as to when it may be appropriate to approve permission to alter OOLTI-designated land, the example LBRuT gives is of a sport's changing facility, such as the pavilion which the applicant seeks to exclude, where it indicates permission should be granted for renovation works!
7.14		The purpose of this provision is unclear. It is misleading to suggest the SBPB only addressed the playing fields and the new green link. To the contrary, it stated: " 2.45 Opportunities to create both informal and formal open recreation space must be taken into account, including for children's play. " In any event, we would dispute that the SBPB contemplated the pitches would be built upon: the statements at 5.38 that " <i>The Council will seek the retention of the two existing football pitches/one cricket pitch for increased public use (DM OS8).</i> " It also talks of residential units 'around the playing fields' (i.e. not on).
7.15		"The proposed replacement OOLTI...". For the reasons stated above, it is highly unlikely that the Council would in practice see fit to designate private gardens as OOLTI

Chapter 5B - Open Space and Playing Pitches Assessment (Gerald Eve)		
	Stag Brewery Mortlake	
	Environmental Statement (ES) – Open Space and Playing Pitches Assessment	Comments by Mortlake Brewery Community Group
		<p>– one or more of the criteria would not be satisfied and it would run contrary to the intent of the designation.</p> <p>In calculating an OOLTI space of 3.06 ha, it appears the applicant has erroneously included many areas that simply should not be included as OOLTI – they would not be afforded that designation through the next Local Plan. These include:</p> <ol style="list-style-type: none"> 1. Private gardens 2. The area to the north of the playing fields, which will be a service road: this is not OOLTI! 3. The skirting to the school and the playing field, which again would not be protected (by itself, at least) 4. The area reserved for a bus turnaround (not OOLTI) 5. Query whether the 'green link' should be included given it was a requirement of the SPBP. <p>The applicant should be asked to re-present showing the calculations only including spaces that the Council, prima facie, considers would be reasonably likely to include as OOLTI in the next Local Plan.</p>
7.16		For the reasons stated, quantity has not clearly been made out and needs to be challenged. Furthermore, we would dispute that the SPBP contemplated loss of playing fields for the reasons stated above.
7.17 to 7.19		Whilst noted, this does not affect the OOLTI analysis in relation to re-provision, save to the extent it relates to quantity (considered subsequently).
7.20		Counterarguments regarding what the SPBP does, and does not, provide have been set out at 7.14 above.
7.22		Stated OOLTI calculations challenged as above. Compliance is therefore contested.
7.25		Stated OOLTI calculations challenged as above. Compliance is therefore contested.
7.29		Stated OOLTI calculations challenged as above. Compliance is therefore contested.

Chapter 5B - Open Space and Playing Pitches Assessment (Gerald Eve)		
Stag Brewery Mortlake		
Environmental Statement (ES) – Open Space and Playing Pitches Assessment		Comments by Mortlake Brewery Community Group
7.31	Quality	<p>The applicant's statement, in relation to the playing fields, states that ' <i>Whilst this provides 'openness' value (see next section) it does not provide any other particular significant quality</i> ' is frankly absurd.</p> <p>Take the definition of OOLTI itself: " ... <i>contribute to the local character and are valued by residents as open spaces in the built-up play area. These areas can include public and private sports grounds, some school playing fields</i> ".</p> <p>The playing fields in question, as well as being open, are demonstrably valued by residents (per the conclusion of the SBPB resulting in the conclusion at 5.38) for what they offer in a built up are and contribute to the local character. This is further demonstrated by the Council's 'All-in-one' surveys for Mortlake and, more recently, East Sheen. The fact that sports grounds and playing fields are expressly mentioned, whereas many other areas are not, provides ample insight into the intention of what OOLTI should cover: playing fields.</p>
7.32 to 7.35		<p>This is where the weakness of the applicant's argument is apparent.</p> <p>No-one doubts that the regeneration of the site will offer a range of benefits. Some of those include new green spaces and amenity areas. This is great.</p> <p>But that is not what LBRuT is being asked to assess here. Which is whether the re-provided land – and it contested as stated above which land it is on the site which is being re-provisioned – is at least equivalent in terms of quality of space. As to which the only logical answer is no. It does not:</p> <ul style="list-style-type: none"> • allow for two large playing fields, a rarity in any development, to be retained; • allow for open views from the north of Williams Lane – noting that a key element of OOLTI relates to the views afforded to neighbours - particularly when 12 tall floodlights and netting are introduced;

Chapter 5B - Open Space and Playing Pitches Assessment (Gerald Eve)		
Stag Brewery Mortlake		
Environmental Statement (ES) – Open Space and Playing Pitches Assessment		Comments by Mortlake Brewery Community Group
		<ul style="list-style-type: none"> • allow for two simultaneous games of football or a game of cricket, requirements of the SBPB; • support the riverside ecosystems which occupy the site and the analysis of displacement in the EIA is scant; • support flood prevention in the way grass does – to the contrary it may increase flood risk to neighboring properties to the south of the Lower Richmond Road and east of Williams Lane; and • (finally) the proposal is not, in the main, "valued by residents", an OOLTI requirement, in the same way that what is presently in place, and more so if optimized as required by the SBPB, does and would do. <p>The application clearly falls over on this point.</p>
7.36	Key message 7c	For the reasons enunciated above, this is materially incorrect, and the 'quality' requirement is not adequately made out in planning terms.
7.37	Openness	The report refers to the draft Local Plan definition of 'open space'. The relevance to the test of 'openness' (not defined, but a term used on multiple occasions) is questionable. It would appear in appropriate to attribute a meaning given to one term to another.
7.38		The applicant seeks to define the meaning of 'openness'. No reference is cited.
7.40		The proposals would retain openness on the western part of the site, across the new playing pitch.
		<p>The applicant states " <i>The proposals would retain openness on the western part of the site, across the new playing pitch.</i>" Whilst some openness would be retained, a material proportion – over half – would be lost in the applicant's plans.</p> <p>It goes on to state " <i>In addition, a new community park at the front of the site is proposed, which would provide enhanced visual amenity in this location</i>". The value of the new community pocket park, situated as it is beside a main road is questionable. But the contribution to 'openness' of parking for buses is negligible. Indeed, the bus turnaround cannot in any way be said to contribute to the OOLTI.</p>

Chapter 5B - Open Space and Playing Pitches Assessment (Gerald Eve)		
Stag Brewery Mortlake		
Environmental Statement (ES) – Open Space and Playing Pitches Assessment		Comments by Mortlake Brewery Community Group
7.41		Stated OOLTI and amenity calculations challenged as above. Compliance is therefore contested. Moreover, these amenity calculations bear no meaning on the 'openness' criterion for OOLTI. This is misleading.
7.42		As noted above, it is already a requirement of the SBPB that this space be made available for community use – so access via a restricted community access agreement cannot be said to be additional.
7.45	Key message 7d	<p>This statement is incorrect for the reasons provided above.</p> <p>At its heart, OOLTI recognizes that a key element of openness is the visual aspect provided to a community. By putting a large building, netting, floodlights and a bus park, where there are currently open green playing fields, the applicant is in no way affording those members of the community for whom the protection largely exists equivalent openness.</p>
7.46	Key message 7e	<p>This statement is incorrect for the reasons provided above.</p> <p>In summary:</p> <ul style="list-style-type: none"> the Council is requested to reach a prima facie decision on what truly constitutes OOLTI, as the items which the applicant would purport to have included in the calculation would appear very unlikely in fact to achieve such designation. Non-qualifying aspects should be removed from the numerator and the calculations should be re-performed; further, as discussed with LBRuT, green and amenity space that planning laws would ordinarily require to be provided must be excluded from the re-provision – this is just adequate provision, not re-provision of protected land; the same might apply to the Green Link for the reasons stated at 7.32 to 7.35 above, the quality of the land – and the applicant has not specified which land – is inadequate; for the reasons stated above (in particular at 7.45), re-provided 'openness' is inadequate: a large building, netting, floodlights and a bus park, where there

Chapter 5B - Open Space and Playing Pitches Assessment (Gerald Eve)		
	Stag Brewery Mortlake	
	Environmental Statement (ES) – Open Space and Playing Pitches Assessment	Comments by Mortlake Brewery Community Group
		are currently open green playing fields, is not equivalent re-provision given the particular function of the openness criterion.
7.47	Other relevant policy compliance	This table omits material relevant policies, including those relating to the protection of playing fields, the enhancement and protection of ecosystems, flood management and air quality, all of which will suffer from the applicant's proposal to remove trees and two grass playing fields.
	Conclusions	Most of these conclusions are questioned, or entirely challenged, above.
8	Chalker's Corner	
8.5		<p>"As part of the Chalker's Corner highway <i>improvements</i>, a small element of the existing OOLTI (approximately 434 sqm) would be lost to facilitate the highway reconfiguration. This <u>very small loss</u> is considered, in this section, having regard to the following:".</p> <p>We would contest the words 'improvements' and 'very small loss' for the reasons provided below.</p>
8.5	Overall Masterplan OOLTI Re-provision	<p>"It is appropriate, therefore, to consider OOLTI replacement across the development as a whole, not in isolation."</p> <p>This is highly questionable. These are separate applications: re-provision should be on the site in question.</p> <p>To the extent LBRuT does determine it to be appropriate to consider the site as a whole, due weight must still be given to the reason for which the OOLTI was granted and the consequence (i.e. assessment of gains and losses) of loss and re-provision for those persons for whose primary benefit the protection was granted. The protection at Chertsey Court certainly wasn't granted to benefit residents at Bull's Alley to the extreme east of the site.</p>
8.6		For the multiple reasons stated above, this is contested.
8.7		"Notwithstanding the overall position, a new area of dedicated replacement OOLTI is

Chapter 5B - Open Space and Playing Pitches Assessment (Gerald Eve)		
	Stag Brewery Mortlake	
	Environmental Statement (ES) – Open Space and Playing Pitches Assessment	Comments by Mortlake Brewery Community Group
		<p><i>proposed at Chalker's Corner to mitigate some of the loss in this location, as described later in this section. The actual net loss of OOLTI at Chalker's Corner, in quantum terms would only be approximately 186 sqm".</i></p> <p>Two significant points on this:</p> <ol style="list-style-type: none"> 1. There is a loss. To the extent (as we suggest) OOLTI needs to be re-provided on the relevant site for which permission is sought, there is an acknowledged loss. Accordingly, 'quantum' of re-provisioned land is not made out. 2. The proposed land on the far side of the Lower Richmond Road does not mitigate the loss in any sense to the residents for whose primary benefit the protection was granted. It is not a garden or courtyard, it is not semi-private or a safe place for activity (to the contrary) and, crucially, it provides no protection against noxious gas emissions or noise emissions, at an area at the heart of an AQMA. This goes to quality of re-provision.
8.8	Key message 8a	For the reasons stated above, this is contested.
8.9 / 8.10		<p><i>" Given the very small size of the Chalker's Corner OOLTI area, <u>it does not perform the same role or have the same benefits of larger OOLTI spaces, such as:</u></i></p> <ul style="list-style-type: none"> <i>contributing to local character by virtue of its size, position and quality;</i> <i>providing immediate or longer views into and out of a site;</i> <i>providing openness value; and</i> <i>providing biodiversity value.</i> <p><i>8.10 The function and role of this particular area of OOLTI is that it provides a pocket of landscape visual amenity value, particularly to the benefit of nearby local residents including those at Chertsey Court and those on Lower Richmond Road to the south. On this basis, Gillespies have considered options for enhancing the landscape visual amenity in this location through improving the existing space and providing additional space".</i></p>

Chapter 5B - Open Space and Playing Pitches Assessment (Gerald Eve)		
	Stag Brewery Mortlake	
	Environmental Statement (ES) – Open Space and Playing Pitches Assessment	Comments by Mortlake Brewery Community Group
		The area in question may be small, but for the clear reasons cited at 8.7 above, it's value is immense and goes directly to the amenity and health of neighbouring residents. Returning to the very definition of OOLTI, these are areas " <i>valued by residents as open spaces in the built-up play area...</i> ". There is no requirement that the land be large-scale (indeed large spaces may not qualify, as indeed they wouldn't as Local Green Space) – but it is hard to think of a space more valued than one which prevents one getting respiratory diseases, extends one's life and allows one to sleep.
8.11	Key message 8b	For the reasons stated above, this is contested. Whilst the area across the road is to be welcomed, it in no way adequately compensates for loss of present OOLTI land, not least in terms of quality.
8.16	Key message 8c	Whilst improvements to the small area of Chalker's Corner OOLTI that remain are to be welcomed, this in no way adequately compensates for loss of present OOLTI land and mature trees, not least in terms of quality.
8.17/8.18	Summary	These conclusions are questioned, or entirely challenged, above.
9.2		<p>Once again, the relevant policies considered are incomplete. In particular, attention is drawn also to:</p> <p>The London Plan, which forms part of the statutory framework for Mortlake – it is unclear why this material omission is allowed – LBRuT is strongly encouraged to require the report to extend to this:</p> <ul style="list-style-type: none"> per Chapter 7.18, "<i>The loss of protected open spaces must be resisted unless equivalent or better-quality provision is made within the local catchment area. Replacement of one type of open space with another is unacceptable unless an up to date needs assessment shows that this would be appropriate</i>"; (Emphasis added) and per chapter 3.19, "<i>the Mayor's Sports Legacy Plan aims to increase participation in, and tackle inequality of access to, sport and physical activity</i>

Chapter 5B - Open Space and Playing Pitches Assessment (Gerald Eve)		
	Stag Brewery Mortlake	
	Environmental Statement (ES) – Open Space and Playing Pitches Assessment	Comments by Mortlake Brewery Community Group
		<p><i>in London particularly amongst groups/areas with low levels of participation."</i> Mortlake is one of five identified areas of deprivation in LBRuT which would statistically benefit from increased levels of participation.</p> <p>There are serious questions as to how these requirements would be made out in the present application.</p>
9.5		<p>This notes the requirement to consult the Local Sports Council, as well as Sport England. Has this been done?</p> <p>Our understanding is that Sport Richmond, on a preliminary basis, favours retention of reinforced grass over a 3G pitch on this site, for reasons that include the ability to play cricket, the ability to avoid floodlight overspill, increased usage (two pitches versus one) and the lower on-going maintenance cost. LBRuT is strongly encouraged to actively consult. Sport England's views on this alternative have not yet been sought, but should be.</p>
9.7		<p>The emphasized text underlines an issue with the draft Local Plan – the views of the Local Sports Council should also be sought.</p> <p>The applicant's comments in relation to the text LBRuT proposes to introduce, allowing re-provision, is acknowledged but questioned in view of the NPPF and London Plan.</p>
9.9		The applicant's summary of the position is materially incomplete.
10	Assessment: Sports and Playing Pitch Provision	
10.3		This statement is incorrect, as explained above. There is nothing in the SBPB, as supplemented by the draft Local Plan, or planning laws to prevent playing fields being protected and additional sport facilities being provided by the applicant. This is fundamentally a question of the applicant's profit.

Chapter 5B - Open Space and Playing Pitches Assessment (Gerald Eve)		
	Stag Brewery Mortlake	
	Environmental Statement (ES) – Open Space and Playing Pitches Assessment	Comments by Mortlake Brewery Community Group
10.4		It would be helpful if the applicant provided a reference in the Development Plan that: " <i>Development Plan policy seeks to protect existing sports grounds and playing fields unless the proposals meet Sport England exception tests.</i> " This is not apparent.
10.5		<p>"<i>In addition, draft site allocation SA24 states that the playing field should be retained or re-provided, thus providing an (emerging) policy basis to consider replacement playing pitches within the development,...</i>" Emphasis added.</p> <p>Although the rationale for this change remains contested, this statement is acknowledged – but would require the retention of two playing fields on the site that we seek, and which the applicant's plans do not provide.</p>
10.6 (and para 3.42 of the report annexed at schedule 16)		<p>Applicant to evidence the statement that "<i>The applicant has worked closely with Sport England, the Football Association and Football Foundation in seeking to address Exception Test E5.</i>".</p> <p>To the extent the emails appended constitute the evidence, (i) this is only evidence of 'seeking' to fit the applicant's proposal within the exception – not seeking those organisations' views nor, importantly, demonstrating compliance and (ii) having reviewed them, most of these emails indicate the respondents actually do <u>not</u> consider the proposals provide adequate facilities for their respective sports. Accordingly, this is misleading.</p> <p>Further, query why cricket – one of only two sports referenced in the SBPB – has not been assessed? Presumably, and logically, because cricket cannot properly be played on one artificial 3G pitch.</p> <p>It would also prima facie seem extremely odd that the Football Association would favour a proposal that would halve the simultaneous playing capacity at peak times when other options are available.</p>

Chapter 5B - Open Space and Playing Pitches Assessment (Gerald Eve)		
	Stag Brewery Mortlake	
	Environmental Statement (ES) – Open Space and Playing Pitches Assessment	Comments by Mortlake Brewery Community Group
		This is the key: capacity is one thing, demand is another. We know the existing pitches are heavily used at weekends, when other community pitches are also in use. It cannot be justifiable to remove that demanded capacity and replace it with excess capacity at times when not required. The report (at 3.45) sets out the demand expected to be generated from the development... at 0.05 artificial pitches.
10.7		See below in respect of the report.
10.8		"During the pre-application stage of the project, the applicant and the team have engaged with various groups and organisations including Sport England, the Football Foundation, the Football Association and Barnes Eagles." Please provide evidence. In respect of Barnes Eagles, the report actually indicates Barnes Eagles have to the date of the report refused to engage and support the proposal?
10.11		The summary of material facts omits the fact that the current pitches are used (more or less) to capacity at weekends (i.e. peak hours for this facility here and in the rest of the Borough, as demonstrated by the report). Accordingly, relative under-use during week days (when presumably consent to use has not been granted by the applicant to date, but for which there is nonetheless demand e.g. by Thomson House school) tells only part of the story.
10.13		<p>" It is evident, therefore, that a significantly wider range of sports provision could be provided compared with the exiting situation. This is a significant sporting benefit resulting from the proposals".</p> <p>Applicant to evidence this statement. To the contrary, cricket – one of only two sports referenced in the SBPB – can presumably not properly be played on one artificial 3G pitch.</p> <p>Further, the potential for a wider range of sports – if true – must not be decisive. An assessment should be made of quality, not purely quantity. The report's focus on sports such as handball (without any disrespect intended to handball per se) is largely an irrelevance – there is simply not the latent demand for that sport in the way there</p>

Chapter 5B - Open Space and Playing Pitches Assessment (Gerald Eve)		
Stag Brewery Mortlake		
Environmental Statement (ES) – Open Space and Playing Pitches Assessment		Comments by Mortlake Brewery Community Group
		is real, current demand for football and cricket that cannot be met by the applicant's proposals.
10.14 / 10.15	Key message 10a	To restate: capacity is only part of the equation, demand is the other. And to the extent current capacity is relevant, this is limited by the applicant's refusal to allow access to the community – something the SBPB requires.
10.16		Range of proposed sports noted. Most of these come from the internal sports hall which forms part of the school. LBRuT to advise whether reprovision would need to be in excess of what any school applicant would need to provide in any event.
10.21	Key message 10c	The applicant's proposal may allow a greater range of 'fringe' sports to be played at off-peak times, to the detriment of mainstream sports at peak times.
10.26	Key message 10d	We welcome the applicant's willingness to commit to a community use agreement. Notwithstanding that this is a requirement of the SBPB. However, the use agreement
10.27	Ancillary facilities	These are welcomed. However, who will finance their upkeep?
10.31 – 10.38	Assessment summary	As stated above, the full range of relevant factors have not been assessed. And, taken isolation, the relevant exception criteria are not made out – see above.
General	Bus park/turnaround	The paper and appended report do not address the sporting merits of a bus park...
General	Financial viability	The paper and appended report do not assess the financial viability (initial and on-going) of the alternatives: grass, reinforced grass, 3G, 3G plus floodlights. This is a material consideration that we can only assume has not been taken into account.
General	Parking	The paper and appended report do not address parking for the facilities. The report mentions use of the 15 school spaces (of which presumably a number will be disabled-only use). The wide variety of sports proposed (such as fencing) require equipment to be transported by vehicle. This provision is woefully inadequate. If not properly managed by a CPZ on neighbouring roads, will result in existing residents being unable to park, especially at weekends. This must be addressed.

Chapter 5B - Open Space and Playing Pitches Assessment (Gerald Eve)		
	Stag Brewery Mortlake	
	Environmental Statement (ES) – Open Space and Playing Pitches Assessment	Comments by Mortlake Brewery Community Group
Schedule 16	Report	
3.1		The statement regarding what is required from a 'policy' perspective. There are many more relevant policies, including those pertaining to the environment, flood prevention and ecosystems.
3.2		The referenced base data cite a lack (current and projected) of youth sized pitches in LBRuT. So on what basis can it be appropriate to halve peak time capacity? The entire report fails to address this key point, so its value must be questioned.
4.5		The lack of support for the applicant's proposals from Barnes Eagles (stated at para. 5.1 to be the main incumbent users of the fields) should be noted by LBRuT.
6.1		For the reasons stated above (including in comments on para. 10.6 of the main report), we would challenge this conclusion: two playing fields remain in demand, especially at peak weekend hours.

Chapter 7 Education

Please refer to the glossary in the Appendices of this document for defined terms.

1. Background

This paper sets out the response of the Mortlake Brewery Community Group (MBCG) in relation to the Application for the Secondary School and education provision for the development. Although primarily focused on the Application relating to the primary school, the inter-linked nature of the Applications means it has aspects of relevance to all Applications. Please refer also to our other submissions.

2. Response

The MBCG objects to all the Applications in their present form as they pertain to the Secondary School and/or education provision.

3. Executive summary – opposition to all Applications¹

3.1 *Support for a school and its location within the Site:* Subject as follows, the MBCG is supportive of including a school / education use within the Site.

3.2 The location for a school on the Site is optimal, save that it should be moved further east to the extent necessary to allow the retention in full of two grass (or reinforced grass) playing fields.

3.3 *Need for a primary school remains unaddressed:* LBRuT and the EIA acknowledge a current and future need for a primary school. This position is very much echoed by our members' recent experiences. The APB originally required the provision of a two-form entry primary school on the Site. Faced with:

- (a) *current and projected future demand for primary education provision, strongly accentuated by the forecast demographics of the development²;*
- (b) *a planning framework (especially the NPPF) which prioritises primary education provision, minimising environmental impact and protection of green spaces, as well as significant opposition to the Chalker's Corner works necessitated in part by the large secondary school; and*
- (c) *a legal framework that requires a local authority to secure adequate primary education, recognising the role of parent choice which will be eroded absent an outstanding new primary school, it is questionable on what basis the Applicant and/or LBRuT see fit to reverse the APB (the only live material planning consideration governing this point, other than the NPPF (which also points to primary school provision). Primary school provision needs to be addressed on a development of this size; in view of the dearth of appropriate local sites, evidenced by Thomson House being next to a level-crossing with no outdoor green space, there is no obvious solution other than on-site primary provision.*

¹ Save where supplemented in the following sections, this executive summary should be construed as the relevant response.

² Absent a new school, many local parents in Mortlake, Sheen and Barnes will be displaced from catchment for two outstanding primary schools closest to the Site, necessitating round daily journeys (vehicular, as a 4 year old cannot travel that distance by foot) of up to 15km to Lowther or Darell where there is capacity). It is unacceptable for the Applicant and LBRuT not to have a solution for this.

At the very least, this requires significant further examination – see 3.8 below.

- 3.4 *Site allocated inadequate for a school of this size:* The area of the Site allocated to the Secondary School represents the bare minimum ESFA allows for an inner-city academy. LBRuT is clearly not an inner-London borough – see further below. Notwithstanding this, MBCG estimates that the school would still occupy a site [40 per cent. smaller than the LBRuT average for this number of pupils]. This is a clear case of quantity over quality; the community's children deserve better.
- 3.5 *Disproportionate impact on neighbourhood:* LBRuT's evidence base supporting the Secondary School has demonstrated no evaluation of the impact that introducing the Secondary School into the Site will have. To the contrary, even the Applicant's reports - which should be independently scrutinised by LBRuT – evidence a clear impact by the Secondary School on:
- (a) *delivery of the APB – the Gerald Eve Playing Fields and Open Space paper acknowledges there is an opportunity cost on the ability to deliver on other aspects of the APB, if one includes a larger school than anticipated, but no report presently examines in full the nature and extent of the same;*
 - (b) *local trip generation – the [Peter Brett Associates Transport Assessment report indicates that] c. 50 per cent. of incremental vehicular trip generation in the morning peak hour will result from the Secondary School, in an area whose local road network and public transport provision is already operating beyond capacity, especially at peak hours. TFL to respond. The impact on safety at the level-crossing concerns Network Rail to such a degree that it intends to oppose the application;*
 - (c) *vehicular emissions of noxious gases in an AQMA, where legal levels of NO₂ are already exceeded before the impact of large-scale (and largely unmitigated) development are assessed – this is a real environmental issue; and*
 - (d) *loss of green and OOLTI-protected space, in the form of Mortlake's only playing fields and at Chertsey Court. We understand Sport Richmond intends to oppose the application on this basis.*

See further 3.8 below.

- 3.6 *Demand for such a large secondary school unclear:* preliminary research carried out by the MBCG's educational consultant (see further 11.7 below):
- (a) *raises material question marks over the anticipated quantum of secondary requirement formulated by the 2015 Cabinet Papers (and successor papers – see immediately below); and*
 - (b) *proposes a range of supply options that require further evaluation but, prima facie, appear better-suited to meeting anticipated demand.*

We also observe that the successor reports to the 2015 Cabinet Papers from earlier this year do not form part of the Applicant's evidence base. It is unclear whether this is purely oversight. Whatever the reason, having the latest evidence base available to LBRuT planning, statutory consultees, ESFA who would most likely be financing any school and the general public is vital.

In view of the materially prejudicial impact that the proposed Application, if granted, would have, LBRuT needs to have a high degree of certainty, based on a thorough and current evidence base, that it is pursuing the optimal solution, both in education and legal/planning terms. See further 3.8 below.

- 3.7 Out-of-Borough provision: Any school on the Site, being situated as it is immediately adjacent to the London Boroughs of Hounslow and Hammersmith, will be legally obligated to accept a large proportion of pupils – estimated to be 31 per cent. based on the Peter Brett Associates travel and transport report – from outside of LBRuT. This is hugely inefficient from an LBRuT taxpayer and LBRuT s.14 Education Act perspective³ and should form part of the decision-making process.
- 3.8 Limited consideration of alternative sites, on the basis of a very limited set of criteria: the evidence base for decision-making to date that has been made available through the Application process is lightweight. Where it has been made available, it indicates a failure to take into account factors of material importance, both practically and in legal and planning terms. In particular, the impact the development would have on a local site – including environmental impact – has been largely disregarded.

Consequently, before LBRuT planning can approve any proposed school – primary or secondary – there needs to be a much more detailed, publicly-available, independent assessment (marrying up school places considerations with and legal and planning considerations) of:

- (a) the projected local supply and demand, based on appropriate and reasonable assumptions (including, without limitation, local demographics, impact of Brexit and percentage of pupils leaving state education in LBRuT, out-of-Borough in-flows and out-flows) to ensure there is minimal risk of empty classrooms here or elsewhere in LBRuT as a result of such decision; and
- (b) (only if that reveals a projected shortfall at primary or secondary level) of all the available options for extension of existing sites or use of new sites, on site-by-site basis, to satisfy such projected shortfall, based on all relevant material factors, and having due regard to proportionality, to include (without limitation):
- (i) accessibility – not artificially limited to 'east of the Borough' and 'west of the Borough', which disregards a number of realities, such as public transport, proximity and parent choice;
 - (ii) financial viability and availability of ESFA-funding;
 - (iii) anticipated catchments (including post-development of the Site);

³ The PBA Report assumes 30 per cent. of pupils will travel in from these areas.

- (iv) anticipated use of LBRuT facilities by out-of-Borough pupils;
- (v) a proper legal assessment of s.14/s.14A duties and the NPPF specific requirement for primary place provision in particular;
- (vi) planning protections (especially to identify land which does not carry protection for a suitable size, especially if it will permit a more appropriately-sized school);
- (vii) complementary proximate facilities, such as sports facilities (e.g. athletics) and cultural facilities;
- (viii) significantly, impact on the local area – in particular, on traffic, noxious gas emissions⁴ (especially in the context of LBRuT being an AQMA and specific areas identified as requiring emissions to be tackled to meet legal obligations), public transport, loss of green space, requirement for compulsory purchase of land at Chalker's Corner, existing catchment areas to minimise displacement (cf. s.14A duty), wider infrastructure, residents and opportunity cost for development of the relevant site for use in other ways; and
- (ix) any other material relevant factors, such as statutory consultee opposition (e.g. Network Rail in view of level-crossing),

Consideration should be given to further public consultation, not least on the basis the original APB was subject to consultation. Any future process, in contrast to the process to date, must be more transparent.

4. Our conclusion and proposed solutions:

4.1 In our view:

- (a) *a new school (or an expansion of an existing school) on the Site remains important to the community and the MBCG supports its inclusion;*
- (b) *the first task must be to undertake the thorough, detailed, independent examination of relevant factors set out at 3.8 above, with the benefit of a stronger and current evidence base (including the report expected to be put forward by and on behalf of the MBCG), to determine the relative merits for a primary school or a secondary school on the Site, or elsewhere;*
- (c) *if the outcome of that exercise is that the Site is the correct site for a primary school or a secondary school, the MBCG (cognisant of its members' differing priorities) would in principle support either:*
 - (i) the original two (or even an expanded three) form entry primary school; or
 - (ii) a smaller, 600 pupil secondary school (to include any sixth form provision LBRuT sees expedient),*in the proposed location identified by the Applicant;*
- (d) *a secondary school with in excess of 600 pupils would, in our view based on the reports and our own independent analysis, be unsustainable in planning terms when*

⁴ The clear direction of travel is to mitigate the impact of emissions on pupils, let alone siting a new school in a known pollution hotspot. See, for example: <https://www.london.gov.uk/press-releases/mayoral/mayors-air-quality-audits-to-protect-london-kids>

considered alongside the cumulative effect of the development as a whole, and would not afford the community's pupils the outstanding educational facilities they (and the LBRuT taxpayer) deserve;

(e) *in contrast:*

- (i) the Site is demonstrably fit-for-purpose for a small primary school, as per the APB and would respond to LBRuT's s.14/s.14A Education Act and NPPF obligations. A far greater proportion of such pupils would travel by foot to such a school.; and
- (ii) a smaller secondary school (but still one that the MBCG understands meets ESFA's minimum funding requirements) would:
 - (A) respond to identified LBRuT demand whilst creating less risk of financially unviable empty classrooms;
 - (B) offer a suitable amount of space for an excellent school in a green, predominantly sub-urban, outer-London Borough, rather than being based on an inner-city design;
 - (C) allow the retention in full of two grass (or reinforced grass) playing fields for use by the school and the community, alleviating one would presume Sport Richmond's concerns as we understand them;
 - (D) dispense with the need for floodlights emitting obtrusive light that prejudices local residents and (protected) night-time views from Chiswick Bridge;
 - (E) have a significantly lesser prejudicial impact on the local community and LBRuT's AQMA obligations and (one would presume) alleviate Network Rail's concerns; and
 - (F) primarily serve the local communities of Mortlake, Sheen, Barnes and Kew (who will bear the burden of accommodating such a school) rather than out-of-Borough pupils being bused in from Hounslow and beyond, offering better value for the LBRuT taxpayer.

5. Heads of objections

For convenience, these responses contain objections (to a greater or lesser extent) and observations in respect of the Applications under the following (non-exhaustive) heads:

- (a) *Overlooking / loss of privacy*
- (b) *Inadequate parking*
- (c) *Overbearing nature of proposal*
- (d) *Loss of trees and loss of ecological habitats*
- (e) *Design and appearance*
- (f) *Layout and density of buildings*
- (g) *Access*
- (h) *Traffic generation*
- (i) *Noise and disturbance from the proposed development*

- (j) *Public visual amenity*
- (k) *Flood risk*

This paper focusses on many legal and planning considerations for which LBRuT has an adopted and proposed set of policies (in the form of the Local Development Management Plan and draft Local Plan) reflecting the principles and national-level policies referenced. The MBCG can upon request seek to provide further reconciliation to local policy, if required, prior to the Application coming before planning committee.

6. Design of school

- 6.1 ***ESFA***: The proposed design appears to be modelled on ESFA's 1,200 'super-block' baseline design, intended for inner-city sites and to maximise economic and space efficiency.
- 6.2 LBRuT, and riverside Mortlake in particular, is categorially not such a location: it is renowned as a green and affluent Borough, as it also is as an outer-London Borough⁵. LBRuT's own commissioned papers identify it as a 'predominately [sic.] sub-urban' area⁶. And as acknowledged in the Peter Brett Associates transport report, the Site lies in an area of poor public transport connectivity, with a PTAL of 2.
- 6.3 Consequently, the basis for constructing a school on the basis of an inner-city design is flawed and must be queried with ESFA. The MBCG is taking steps to initiate such a meeting before the Applications come to planning committee and would encourage LBRuT, as part of ensuring a proportionate evidence base from which to properly assess alternatives, do likewise.
- 6.4 While the availability of central funding will doubtless be a factor in decision-making, it must not be the only factor in seeking to arrive at the optimal solution.
- ## 7. Scale and density of school / privacy
- 7.1 ***Scale***: At three stories, the school would be similar to (if a little higher than) neighbouring properties, which is broadly acceptable. We note ESFA also has a two-storey design for 1,200 pupils.
- 7.2 However, we have some concerns that the proposed use of the third floor as a play area will impact neighbour privacy, and that the safety screens will, in effect, cause the building to be raised to four storeys which is out of keeping with the neighbourhood and the APB which contemplated a single or double storey building, with no mention of a roof terrace.
- 7.3 ***Planning conditions***: In view of the impact the school would have on the local area, planning conditions should prohibit any further expansion of the school on the Site (be that lateral or vertical).

⁵ <https://www.londoncouncils.gov.uk/node/1938>

⁶ LBRuT-commissioned report by Turley Associates from September 2008, states: "The areas that normally need careful consideration before implementing higher density developments and are inappropriate for taller buildings based on the study's assumptions include Hampton Wick, Barnes, Strawberry Hill, St Margaret's and Mortlake. These areas are predominately [sic.] suburban in character with small local centres." Emphasis added

8. Scale and density generally / impact on APB
- 8.1 Interaction of Applications: The school application brings to the fore the interaction of the three applications and the impact on the APB (a material planning consideration), as well as other material planning considerations such as the NPPF.
- 8.2 As noted in our comments on design and access generally, the cumulative impact of such a large school and a high-density residential development that also tries to squeeze in other provision contemplated by the APB, renders the proposed development unsustainable. It also means that other aspects of the APB that the community and LBRuT wished to see introduced - for instance, a boat museum and workshops ensuring a range of activities and employment types, even if less profitable than a cinema, have been sacrificed.
- 8.3 Design review: LPAs should refer major projects, where appropriate, for national design review. Have the design review panel considered the present Applications, including in relation to the school, and provided recommendations?
9. Primary school
- 9.1 Summary of key issues:
- (a) *the APB provides for a two-form entry primary school;*
 - (b) *the School Planning Place Strategy noted, at paragraph 5: ', ... more places will be required to meet longer-term forecast demand, particularly in the primary phase.'*
 - (c) *the EIA concludes that primary education provision is inadequate;*
 - (d) *most recent figures demonstrate that need has increased since that date; our members attest that there is a considerable shortage in primary school places around the Site, which would otherwise be met by the provision of a primary school on the Site: the local school to the Site – Thomson House, some 100 metres away - has a 330 metre catchment area and is understood to be the most over-subscribed school in LBRuT;*
 - (e) *the Plans, in particular the break down by unit type which is now available, point towards a greater future need for local primary school provision on the Site than secondary school provision;*
 - (f) *the Education Act does not prioritise secondary education need over a primary education need; and*
 - (g) *the NPPF (at para. 72) requires LPAs to ensure that a sufficient choice of school places is available to meet the needs of existing and new communities.*
- 9.2 Paragraph 38 of the NPPF also makes express provision for primary schools being within walking distance of new large-scale developments, in a way it doesn't do so for secondary schools. It states:
- "Where practical, particularly within large-scale developments, key facilities such as primary schools and local shops should be located within walking distance of most properties."*
- The reason would appear to be clear: secondary school pupils can reasonably be expected to travel further by foot or public transport, safely, unaccompanied.
- 9.3 Displacement from primary catchment for local residents: Adequacy of primary school provision for new residents of the Site, but also those existing residents

bordering the Site, must be assured. At present, this is not the case. There is a real likelihood that parents of children who would otherwise attend Thomson House school and St Mary Magdalen will be forced out of catchment for an 'outstanding' local school and instead, based on offer data for the most recent application round, be made to make daily round trips of fifteen kilometres with four year old children to less high-performing schools. It is hard to see how LBRuT would be in compliance with its obligations under section 14 of the Education Act, not least sub-section 3A in respect of parental choice, if it were not to address this.

- 9.4 Further, per section 2.38 of the APB: "*The impact of any future proposals for the site on the amenity of surrounding residents must be considered, particularly where the site adjoins existing residential properties.*" Taking immediately proximate residents out of catchment for outstanding primary schools, requiring lengthy journeys at inconvenient times, clearly falls within this category. An acceptable solution, taking into account parent choice, must be identified now.

10. Secondary School

11. *Need for secondary school:* In relation to the base case for a new secondary school in LBRuT:

(a) *The 2015 School Planning Place Strategy (forming part of the 2015 Cabinet Papers) was predicated on certain assumptions, the detail of which have yet to be made fully publicly available, although some have been shared with members of the MBCG. These, together with any updated reports – see below – have formed and will for planning purposes form the principal evidence base establishing the need for a new secondary school. Those assumptions should now be publically re-tested, with forecasts updated, to take due account of:*

- (i) revised demographics (including projected demographics on the Site);
- (ii) new schools that have opened or are planned to open and schools that are looking to expand;
- (iii) increased provision at existing schools (or scheduled to take place at existing schools);
- (iv) 'Brexit';
- (v) the high proportion of parents who elect to educate their children, at secondary school age, (i) in the private sector or (ii) out of the Borough; and
- (vi) recent improvements at Richmond Park Academy.

(b) *The demand case set out in the 2015 Cabinet Papers is based on demand and supply in the 'eastern part of the Borough'. Section 14 of the Education Act 1996 (as amended), neither requires nor justifies a distinction between 'the eastern side of the Borough' – on which the Borough's numbers are calculated – and the western part. It also disregards relevant, practical issues: for example:*

- (i) a school in the western part of the Borough may be closer to a pupil living in the eastern part of the Borough;
- (ii) a school in the western part of the Borough may otherwise be more accessible to a pupil living in the eastern part of the Borough – for instance by train;

- (iii) it may be more cost efficient to travel to the other side of the Borough, than within it; and
 - (iv) a school on the other side of the Borough may be of a higher standard than, or offer facilities of a type not offered by, a school in the other side of the Borough.
- (c) *As noted in the Executive Summary, recent information, materially important to the factual accuracy and currency of the evidence base, from 2018, has been omitted from the Applicant's reports.*
- 11.2 **Consideration of alternative sites:** The School Planning Place Strategy forming part of the 2015 Cabinet Papers offers no evidence of a consideration of alternative sites for the location of a secondary school when determining that the Site is the only location for a new school of this size. It simply states that, '*In attempting to secure sites for proposed and possible free schools, both primary and secondary, within the borough, the Education Funding Agency has undertaken extensive searches.*'
- 11.3 LBRuT's own assessment, created in spring 2017 only after the decision to put the school on the site had been taken, has the following flaws:
- (a) *it fails to take into account certain factors that are highly-relevant to the decision-making process here, including those identified in the NPPF and London Plan: it did not cover environmental/air pollution aspect, transport accessibility, opportunity cost of doing this versus alternative uses, nor whether a larger area could be available on one site versus another. See further the Executive Summary above for what we consider could and should be taken into account in conducting such an exercise;*
 - (b) *it places undue importance on the factors that were identified;*
 - (c) *it fails to reflect the proximity of the Site to the Boroughs of Hounslow and Hammersmith and Fulham, the consequence of which is the out-of-Borough pupils may make up (per the PBA Transport Report) c. 31 per. cent. of pupils – LBRuT to investigate;*
 - (d) *it relies on incorrect assumptions: for example, as regards a Barn Elms alternative, the paper suggests the whole site is a multi-use sports ground within Metropolitan Open Land (MOL), which (A) [is not the case because the tennis courts and carpark are not within MOL]; and (B) in any event, an area for the secondary school could be carved out whilst not materially impacting that area – whereas to put a large secondary school on the Stag Brewery site will have a material impact on the entire local area/sports provision, as detailed elsewhere in these remarks. [The options paper submitted by the MBCG at the time to stimulate further discussion can be made available upon request].*
- LBRuT is requested to undertake the further evaluation process described in the Executive Summary.
- 11.4 **Alternative sites: option for more than one site not considered:** LBRuT's and ESFA's remit (per paragraph 3.15 of the 2015 Cabinet Meeting Minutes) for the evaluation of suitable sites examined only sites capable of six-form entry. It did not look for more than one site that could accommodate the Council's determined demand.
- 11.5 Two new schools could fill the same gap — and, critically, they would require less space and have a less significant impact on the environments in which they are situated and the ability to use that space to meet other, equally valuable, needs,

such as housing, employment, social benefits and environmental protection. Either or both of those schools could be adjuncts to existing schools to improve the financial viability analysis. As far as we are aware, these options have not been considered, but should be as we look at the optimal solution in a sub-optimal situation.

- 11.6 ***Need for sixth form:*** The 2015 Cabinet Papers make no reference at all to the requirement for a sixth form. In fact, no evidence base for this decision has been made available. To the extent this is determined to be necessary, the requisite space would need to come from having a smaller main school (e.g. 3-form entry secondary school plus 150 pupil sixth form).
- 11.7 ***MBCG report:*** Owing to the material question marks hanging over these questions and the material impact that requiring such a large school to be on the Site would have on the community, the MBCG has commissioned a report. We anticipate the findings of that report will be made available prior to the Applications reaching planning committee. The findings of this report, if and when available, should form part of LBRuT's evidence base (both for the present application, and in making amendments to the draft Local Plan).
- 11.8 ***Appropriateness of Site for Secondary School:*** in addition to the design issues raised, the following matters remain unaddressed:
- (a) ***Traffic and access:*** *the combination of increased school-related traffic - which the Applicant puts at 50 per cent. of the increase in trip generation from the development - buses turning into the Site and/or dropping off and waiting for pupils and extra road crossing time at peak hours will cause traffic to come to a standstill, which will in turn cause havoc at Chalker's Corner where traffic will be unable to turn into the Lower Richmond Road from the main arteries (A316, A205, Lower Richmond Road);*
 - (b) ***Site borders an area forming part of the Council's AQMP in an AQMA:*** *the area cannot sustain a further increase in emissions. The developer estimates that over 50 per cent. of additional trip generation (with consequent increase in emissions) will come from a secondary school of this size. The Council is reminded of the recent judgment handed down in Gladman Developments Ltd v Secretary of State for Communities and Local Government and others [2017] EWHC 2768 (Admin), which highlights the planning department's legal duty in relation to assessing the impact of a large-scale development on emissions of noxious gases, particularly as regards sections 120 and 124 of the NPPF⁷. In any event, the EIA needs to be rigorously tested on matters of air quality and, if needed, second independent review should be commissioned;*
 - (c) ***Recreation space:*** *as covered in our comments on the Gerald Eve paper on playing fields and open space, one playing field for 1,200 pupils, in a borough such as LBRuT, is not satisfactory - as explained above, this most certainly NOT an inner-city Borough; and*
 - (d) ***Conflict with APB, resulting in other uses being prejudiced:*** *as we are now seeing, the APB (as supported by the Local Plan) is incapable of being properly implemented,*

⁷ Planning policies should sustain compliance with and contribute towards EU limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and the cumulative impacts on air quality from individual sites in local areas. Planning decisions should ensure that any new development in Air Quality Management Areas is consistent with the local air quality action plan.

to create a new village heart for Mortlake, through the inclusion of the Secondary School on the Site. Other aspects of the APB, such as a boat museum, have also fallen by the wayside, seemingly to accommodate aggressive density.

- 11.9 Out-of-Borough provision: LBRuT is legally obligated to accept out-of-Borough pupils: it is powerless to prevent this, save through careful selection of sites away from Borough borders. As noted above, the Site borders Hounslow and is close to Hammersmith and Fulham. Some 31 per cent. of pupils travelling to the Secondary School are projected by the transport report providers to emanate from outside of LBRuT.
- 11.10 Role of the 2015 Cabinet Papers in the present evidence base: The 2015 Cabinet Papers highlight a number of procedural issues in relation to LBRuT's decision-making process which may impact the suitability of that evidence base for present purposes.
- (a) *there is no discussion in the minutes (and there is scant evidence in the supporting School Places paper too) as to the appropriateness (or otherwise) of the proposed site, the alternatives (including smaller schools or other sites, and expansion of existing sites), the deliverability of the site, the consequences, proportionality and sustainability of the decision – no evidence of probing, nor of dissenting voices, on such a key issue that would directly impact the largest development projected to take place in LBRuT for a generation;*
 - (b) *the entire meeting, which addressed this key issue and some twelve other matters, lasted just seventeen minutes. It is unclear how a proper assessment of the matters raised above could properly have taken place in such a time;*
 - (c) *in contrast, the proposal to include a primary school on the Site was reached as a result of a detailed and rigorous consultation process⁸ which (presumably) did consider the full range of appropriate issues. LBRuT should consult properly on a material amendment to a matter which underpinned a supplementary planning document (i.e. a material planning consideration). The (necessarily) high-level approach to Local Plan consultation is not adequate for these purposes, and has not yet been adopted, leaving the APB as the only relevant planning document.*
- 11.11 Size of Secondary School: For the reasons stated in the Executive Summary and above, if the school does need to be a secondary school, it should be no larger than 600 pupils, cf. 1,200 currently proposed.
12. Health and safety
- 12.1 Health and safety impact assessment: The Secondary School, as currently proposed, presents a number of health and safety issues that have not been satisfactorily addressed or mitigated by the Applicant or LBRuT in the EIA (or otherwise). These risks are considered in greater detail elsewhere in our submission, but in summary these include:
- (a) *the risk of an accident occurring at the Sheen Lane level crossing increases materially as the volume of usage increases, which is correctly assumed to be the case*

⁸ Adoption of the APB followed a round of representations made on the back of four detailed land usage proposals on which the community was asked to comment. The consultation process comprised (i) an evening event in December 2009; (ii) an exhibition held between 4-6 November 2010; and (iii) a Public meeting on 9th December 2010, which was attended by approximately 130 people.

in the Peter Brett Associates transport report (though we query the detailed calculations and assumptions). Network Rail has indicated it will oppose the Plans;

- (b) *the risk of an accident at Chalker's Corner, as the extra school-related traffic flowing inwards – not addressed by the Applicant's plans – will lead to cars not being able to leave the junction and blocking it. Our members witnessed this first-hand recently when temporary traffic lights were in situ on Lower Richmond Road adjacent to where the school would be situated. TFL's views and those of the Highway's Agency should be sought specifically on this, as well as generally; and*
- (c) *the risk of respiratory diseases and cancer occurring in pupils owing to illegal levels of noxious gas emissions. There have also been reported links made between 3G pitches and cancer (although we express no view on this)⁹. LBRuT should expose as few pupils, and teachers to whom LBRuT owes a duty of care, to this as possible.*

12.2 In contrast, a two-form entry primary school would have minimal negative impact given the expected catchment area and that pupils of such age are likely to walk (accompanied by an adult) to the Site. Consequently, the Chalker's Corner works (the third Application) may not be required if there were a primary school instead – LBRuT and Applicant to investigate.

13. Transport and access

13.1 Applications generally: We refer you to our responses to the Applications as they relate to the school and the cumulative impact of the development generally.

13.2 Parking: Per EIA 5.73: "*No basement car park is proposed to be connected to the school. A total of 15 car parking and secure cycle parking would be provided at ground level to the east of the school building along with hard and soft landscaping. Three bus parking spaces and a parent drop off / pick up area will also be provided for the school on a new road to the east of the proposed school. A new vehicular access route is proposed to be created from Lower Richmond Road, as shown in detailed planning application drawing C645_Z3_P_AL_001.*"

15 car parking spaces for staff and pupils is clearly inadequate. To a lesser extent, but similarly, a 3-bus park is inadequate at school pick-up time for a school of this size. It may, however, be sufficient for a 600 pupil school, with a smaller catchment.

14. Playing fields and open space

14.1 Playing fields: Reference is made to our detailed response to the Gerald Eve playing fields and open space report.

14.2 To re-iterate a small number of points:

- (a) *to situate the school building and 3G pitch on the existing grass playing fields would materially conflict with planning laws (including the NPPF presumption of building on brownfields sites rather than greenfield) and LBRuT's own Development Management Plan and (if adopted) draft Local Plan – once this land is gone, it is gone;*

⁹ <https://www.telegraph.co.uk/health-fitness/body/are-artificial-sports-pitches-causing-cancer/>

- (b) *the loss of the ability to simultaneously play two games of football at peak times, or to play cricket, both of which would be valuable resources to any school, is not justified;*
- (c) *it is quite clear that the criteria which would need to be met for re-provision of the OOLTI (and APB) protected playing fields have not been made out and the MBCG's local green space application for the fields remains pending; and*
- (d) *building the Secondary School as currently proposed will necessitate the loss trees and, through the loss of trees and grass, impact the ecosystems that interact with those at the riverside and eliminate an important flood prevention tool.*

Chapter 8 Affordable Housing

The statement from Reselton Properties is extremely disappointing. The proposal to allocate just 20% of affordable housing on the site does not attempt to address the current level of housing need in the London Borough of Richmond upon Thames (LBRuT) or recent local and regional policy developments to drive up affordable housing. The Affordable Housing Statement relies on the viability argument to propose a minimum level of affordable housing.

Our examination of the Financial Viability Assessment shows the developer allowing a profit of 20% of GDV which is some £155 million. In addition, there is a developer's contingency of £25 million. This strongly indicates that the developers have sufficient margin to offer up to 35% of affordable housing on the Mortlake Brewery site.

The Affordable Housing Statement submitted ignores the borough's own housing policies agreed by Cabinet as recently as March 2018; the London Plan and the Draft London Housing Strategy.

We urge the Council to rigorously scrutinise this statement in line with their own policies and recent policy and guidance from the Mayor's Office.

Housing Need in LBRuT

Unfortunately, the Affordable Housing Statement does not refer to either the SHMA report of 2016 or the new Housing and Homelessness Strategy when setting out the local context. These are serious omissions.

1) SHMA Report

The Strategic Housing Market Assessment (SHMA) report 2016 carried out by GL Hearn for LBRuT provides an in-depth analysis of the housing market, including the need for provision of affordable housing in the borough. The assessed need is for 964 households per annum. The report also stresses the importance of seeking 50% on-site affordable housing on schemes over 10 dwellings.

http://www.richmond.gov.uk/media/14284/housing_market_assessment_final_report_december_2016.pdf

The executive summary of the SHMA states:

- *Market signals section indicates that house prices increased by a third between 2010-15 and are higher than in many Outer London Boroughs. Rental costs have increased 39% between 2011-15, alongside a substantial increase of PRS between 2001 and 2011 but particularly in the post recessionary period. In both cases this represents a significant growth in housing costs in real terms. The evidence suggests entry level house prices in the Borough in 2014 were 14.5 times the incomes of younger households – significantly above the Outer London average of 9.8.*
- *Affordable housing need has been assessed using the Basic Needs Assessment Model, as set out in Planning Practice Guidance. Set against a limited supply of affordable housing and*

high costs for market housing for sale and rent, a high need for affordable housing is shown – 964 households per annum. This level of need is assessed on an unconstrained basis.

- The high level of affordable housing need clearly justifies policies seeking to maximise the delivery of affordable housing in the Borough, so far as this does not render development unviable. The Council's current policies seek 50% on-site affordable housing on development schemes of over 10 dwellings, and contributions to affordable housing on smaller sites. The needs evidence will need to be brought together with a Plan-wide Viability Assessment in drawing conclusions on future policies for affordable housing provision, but would justify a continuation of the current policy approach.

2) Richmond Housing and Homelessness Strategy 2018-2023

Following on from the SHMA 2016 report, a new Richmond Housing and Homelessness Strategy 2018-23 was agreed at a Cabinet meeting in March 2018

https://haveyoursay.citizenspace.com/richmondhrd/rhhs/supporting_documents/Draft%20Richmond%20Housing%20and%20Homelessness%20Strategy%2020182023.pdf

The strategy recognises that affordable housing is needed to address the needs of 3670 applicants on the housing register and that a range of different types of housing is needed to accommodate households from different incomes.

- The SHMA 2016 identifies an overall housing need of between 895–915 homes per annum until 2033, with 50% being affordable housing. Whilst it is self-evident that not all housing demands and options can be met in the Borough it is recognised that the development of affordable housing should meet a range of needs. This includes providing low cost rent housing to support formerly homeless households to move on from temporary accommodation, supporting low and middle-income residents and workers into low cost rent and homeownership options and providing housing options that let more vulnerable residents live independently in their own homes.
- Housing opportunities for local residents and workers on low to middle incomes to access the private housing market are limited. The LBRuT is the most expensive Outer London borough for house purchase and is the eighth most expensive borough in London. Private renting is also unaffordable for many residents as the Borough has the highest average private rent levels in Outer London, with costs rising by 30% between 2011/12 and 2016/17.
- The Borough has around 10,000 social housing units; this represents the fifth lowest social housing stock in London and as at 1st October 2017 there were 3,670 applicants on the housing register. The high costs of market housing and scarcity of social housing in the Borough highlights the clear need for a range of affordable housing products to accommodate the needs of households on a range of incomes.

3) Other omissions

The Affordable Housing Statement also fails to refer to the Mayor of London's draft Housing Strategy published in September 2017 setting out a plan to make more homes affordable to Londoners on low and middle incomes.

Although, the Affordable Housing Statement does refer to draft London Plan 2016, it quotes sections of it selectively. The statement fails to refer to Policy H5 Delivery of Affordable Housing which sets out a strategic target of 50% of all new homes across London to be affordable. It dismisses the threshold approach to viability outlined in H6 Threshold Approach to Applications of the London Plan enabling developers to fast track the viability process if a commitment to provide 35% of affordable housing on site is given. The developers simply state that this was "discounted at an early stage on viability ground" (para 5.3 of Affordable Housing Statement) with no rationale provided.

Proposal for 20% Affordable Housing is not acceptable

The Mortlake Brewery Community Group urges the Council to reject the proposal for 20% affordable housing and insist that the developers make available 35% of the site for affordable housing in line with their own policy and the Draft London Plan.

We also call on the Council to reject the proposal to limit affordable housing to Block 18 on the masterplan. Block 18 is located on the western part of the site. The western part of the site is not due to be developed until the eastern side of the site is completed.

We totally reject the idea that affordable housing should be limited to one building. Provision of affordable units should be equally spread on both the eastern and western parts of the site and we expect affordable housing to be built in the first phase. Mortlake has always been a mixed and inclusive community and it is not acceptable to us that affordable housing should be "ghettoised" in this way.

We support the proposal for the split in tenure to be 80% social/affordable rents and 20% intermediate, i.e. shared ownership.

Finally, we urge the council to robustly test the assumptions made by the developers in paragraph 5.7 of the Affordable Housing Statement and the FVA. It is not appropriate for the developers to insist in paragraph 5.8 that 20% of affordable housing will only be provided if these conditions are met.

The Mortlake Brewery site development has the potential to provide a significant supply of much needed affordable housing for the borough. Failure to maximise the potential of the site would be lost opportunity and great tragedy for many people waiting for affordable homes in Mortlake.

Chapter 9 - Community Space and NHS Facilities

The proposed design of the Maltings (building 4) suits neither the developers nor the community. The siting of the lifts and stairs in the core of the building, rather than at the edge, and space devoted to rubbish, means that only 65% of the floor space is useable for accommodation or community use. The proposed configuration reduces the flexibility of use for this space.

Background

In September 2017 the proposed design for the ground floor of the Maltings was shown at a Community Liaison Group meeting. A large area on the ground floor was taken up by lifts, stairs and reception areas for the flats, leaving two inflexible rooms and an entrance hall. This surprised members of the Mortlake Community Association (MCA) and the Mortlake Brewery Community Group (MBCG).

In October 2017 the MCA and MBCG sent Dartmouth Capital, Soundings, the Planning Department, Cllrs Pamela Fleming and Paul Avon:

- A design critique of the plan
- Suggestions for alternative layouts
- An outline of the requirements and needs for a viable community centre and its funding

In November 2017 the MCA and MBCG met with Guy Duckworth, from Dartmouth Capital. We raised our anxieties about the layout and were assured that the developers were looking to see if changes could be made. They were anxious that their work on the ground floor would be of good quality as it will be the 'advert' for the rest of the development.

Maltings - Proposed plans April 2018

There is no evidence that anyone has incorporated the MCA and MBCG proposals submitted in October 2017. The only change is that the smaller room on the ground floor has lost some space to rubbish. The first floor has space for flexible use, but it is difficult to know how it could be used. This building has the potential to provide an excellent community space on the ground floor and spacious flats on each of the floors above. The plans suggested by the MCA/MBCG achieve this, these plans do not.

- The MCA/MBCG plans increased the available floor space by over 20%, better for community use and the flats.
- The two (in)flexible spaces on the ground floor are linked by a corridor on the river frontage thus wasting the potential of this riverside setting. People using a community centre would appreciate being able to see and enjoy a view of the river, why ignore it?
- The requirements of a community centre are for interconnecting rooms which are independently accessible. The present arrangement of two rooms, each with only one door, is inflexible and impractical.
- The shape of the rooms makes them hard to divide logically. The larger room is either two long thin rooms or four very small ones. The smaller room, with a section taken over by rubbish storage is equally inflexible.
- The majority of community activities include tea and biscuits. There is no small kitchen.
- There is no office space. No centre can run without administrative support.
- A key attraction of a community centre would be a café with a view of the river for both users of the centre and passers-by. A first-floor corridor accessible only by stairs with no space for catering does not provide this.

An enduring community space needs to be financially independent; It would be difficult to generate the requisite annual income from this inflexible design. In addition, it would make it extremely hard to raise the funds to fit it out, why would anyone want to invest in a building that was not of real benefit and use to the community it serves?

Many users of the Community Centre will be of poor or limited mobility, the model shows a ramp to the flat entrance but not to the general entrance.

The MCA and MBCG call on the Planning Committee to reject the plans for Building 4 as being unsuitable for a Community Centre and support the revisions originally proposed by the MCA and MBCG.

Health Facilities

The development will bring a 40% increase in local residents and one thing we should all expect to see are NHS GP and primary care facilities on the site.

It is positive to see that the plans include a Residential Care Home and a supported housing facility. However, the care provided in both will be largely private, will not include any NHS care and will be specifically for the people who live in these two places. Furthermore, many of the residents in the care home and housing facilities will have higher than usual needs for NHS primary and community care.

- **WHERE ARE THE ADDITIONAL NHS SERVICES?:** lack of any NHS facility could be a major concern; the developer recently suggested the minimal four clinical rooms may be dropped owing to lack of interest from local GPs - this is not acceptable
- **EXISTING SERVICES BARELY COPING:** Unless plans for additional services are made clear, current local residents will therefore have to wait even longer to get a GP appointment.
- **EXTRA JOURNEYS TO GP, to OUTPATIENTS AND HOSPITAL** lack of any additional facilities will only add to journeys, many of which will be by car (or by ambulance for the residents of the care home and the supported housing).
- **NOT DOWN TO THE DEVELOPER ALONE** the Richmond Clinical Commissioning Group has an important role to play but we should press Richmond Local Authority, through the planning process, to explain what the plans are for the much needed increase in NHS primary and community care services to match the needs of the additional population.

We urge the planning committee to ensure that adequate NHS facilities are provided with this site.

Chapter 10 - Environmental Impact Assessment

Stag Brewery Environmental Statement – Summary

- Alternatives – no assessment of off-site (as distinct from on-site) locations for the proposed secondary school (because clearly not within the brief); more rigorous assessment needed of the alternative method of transportation of all demolition waste, excavated soil and construction materials via the river instead of the road (this cannot be dismissed in a few sentences).
- Socio-economics – no assessment of the benefits of affordable housing, nor of the proposed school being as large as 6-form entry plus 6th form.
- Transport – more rigorous assessment needed of the proposed reconfiguration of Chalkers Corner which is likely to attract latent demand and very soon become gridlocked as at present; also of the school traffic; and of the potential for club car use as an alternative to car ownership.
- Noise – no assessment made of the benefits to residents of Lower Mortlake Road if transportation of waste and construction materials were made by river rather than by road.
- Air quality – no assessment of other toxic gases, vis. benzene, carbon monoxide, lead, ozone and sulphur dioxide in accordance with EC Directives; no rigorous account of the assumptions made about the potential decrease in pollutants resulting from any increase in electric vehicle use; no indication of how long it would take for new planting at Chalkers Corner to become effective as an absorber of air pollution.
- Ecology – no assessment of the loss of the grass playing fields as a food resource for birds.
- Visual – no assessment of the impact of the proposed reconfiguration at Chalkers Corner.
- Daylight/sunlight, etc – insufficient consideration of the overshadowing of the river, towpath and open riverside spaces caused by the proposed housing blocks.

Stag Brewery Environmental Statement – Detailed Analysis

Stag Brewery Mortlake Environmental Statement (ES)		Comments by Mortlake Brewery Community Group
1.	Introduction	
1.7	Site Context “An approximately 9.25 ha parcel of land....”	Need to explain why/how it has increased from 8.6 ha in 2017. It seems that the site now includes the towpath – is this with the approval of the Borough and PLA?
2.	EIA Methodology	No comment
3.	Existing Land Uses and Activities	
	Transport and Access	
3.17	“The closest bus stops to the Site are situated on Lower Richmond Road and Mortlake High Street. With routes 419, 969, N22 and 209 serving....”	Need to add: “and on Chertsey Road (A316) with route 190 serving Richmond, Hammersmith and West Brompton and on Mortlake Road (A205) with route R68 serving Kew and North Richmond.”
	Ecology	
3.34	“No roosting bats are present....”	Need to mention that foraging bats are present.
	Townscape and Visual	
3.42	Conservation Area.... Other Open Land of Townscape Importance (OOLTI)....	Need to mention that the Thames towpath within the site boundary is part of the Thames-side MOL; also that the adjacent Mortlake Green is an OOLTI.
4.	Alternatives	
	Education Uses and Location of the School	
4.26	“A comprehensive exercise was carried out by the Applicant’s design team to identify the optimal location for the new school requirement. Various locations for the school were considered, and the ESFA confirmed that, for any option, the existing grass playing fields would not be suitable to provide the necessary school play and sports.”	The ES has assumed that the optimal location would be on-site, not off-site. For the record it should be noted that the Council claimed to have considered alternative locations for the new school off-site, notably that part of Barn Elms which is outside MOL and which was rejected despite the

Stag Brewery Mortlake		
Environmental Statement (ES)		Comments by Mortlake Brewery Community Group
4.41	<p>River Thames Transportation</p> <p>“Consideration was given to the use of the River Thames for removal of demolition and excavation waste, the delivery of construction materials, and provision of public transport to and from the site. However, owing to the following reasons this was discounted at this stage of the planning process:</p> <ul style="list-style-type: none"> • due to the variance in tidal range, at low water the foreshore is exposed and therefore water craft can only move to and from the wharf either side of high water; • likely closure of the tow path during demolition and construction work; • the costs required to repair and upgrade the wharf; • distance to a suitability facility to load and unload the various materials.... journey time of 5-6 hours; • navigational conflicts with other river users such as rowers; • existing river bus services currently terminate at Putney Pier and provide a commuter service to Blackfriars with a journey time of around 45 minutes.... the site is approximately 6.2km from 	<p>ample space, excellent public transport access and Council ownership.</p> <p>The preferred option on-site was to the east of the playing fields. Gerald Eve’s Open Space and Playing Fields Assessment has given credit to MBCG for having generated this option (the ES has not done this) but indicated that ESFA were insistent on the playing fields becoming a single all-weather pitch.</p> <p>A problem for the river bus but surely not for barges carrying waste and construction materials which do not need to adhere to strict timetables.</p> <p>It could be bridged over.</p> <p>Have such costs been calculated? How does this compare with total journey time?</p> <p>Not an insurmountable problem.</p> <p>The intention would be to run a river bus service from Mortlake to Hammersmith only – as an alternative or supplement to the 409 bus.</p>

Stag Brewery Mortlake		
	Environmental Statement (ES)	Comments by Mortlake Brewery Community Group
	Putney Pier, as such the overall journey time to Blackfriars would be approximately 1hr 15 minutes.”	
5.	The Proposed Development	
	Public Realm and Amenity Space	
5.55	“A new public community park would be provided to the south of the new school....”	No mention of part of this park being used for a bus turnaround space.
	Private Realm and Amenity Space	
5.57	“Private amenity space would be provided in the form of ground floor communal courtyards and private gardens....”	This sounds like gated communities. Is this what the Council wants?
	Flood Defence	
5.85	“New flood defence walls would be provided.”	But the model in the library shows the Maltings plaza terraced down to the river without any sign of a flood wall. Confusing.
	Landscaping and Ecological Environment	
5.87	“A mix of approximately 200 evergreen and deciduous trees.... approximately 160 new trees and 51 retained trees.”	The ES does not indicate the number of trees being removed but it is noted that the site has been extended to include the towpath where trees are shown retained – presumably to compensate for the large number being removed.
5.88	“The existing towpath.... would be enhanced, including additional seating and pruning....”	No mention here of any agreement with the Borough and PLA.
5.89	“The development would provide.... biodiversity roofs....”	Where? Not shown on drawings.
5.90	“The works at Chalkers Corner would involve retaining 28 trees and the removal of 22 trees.... It is proposed to add a total of 33 new trees, resulting in an overall increase in 10 trees.”	These numbers do not tally with the numbers shown on the drawings. Also several trees being removed are over 15m high and the ES does not state how long it would take for replacement trees to grow to that height.
	Lighting Strategy	

Stag Brewery Mortlake		
Environmental Statement (ES)		Comments by Mortlake Brewery Community Group
5.104	"The sports pitch would be served by floodlights.... An assessment of light trespass as a result of these floodlights has been provided...."	This assessment is not shown in Chapter 18 below.
6.	Development Programme, Demolition, Alteration, Refurbishment and Construction	
	Access	
6.38	"Access to the works.... will be via Ship Lane."	It is not clear whether Ship Lane will remain open during the construction period. Clearly closure will have a negative impact on residents of Thames Bank and the pub. This must be clarified.
6.39	"It has been assumed that all construction HGVs would access the site from the west via Chalkers Corner."	Why has this assumption been made? Alternative access mentioned in para 4.41 needs to be further explored.
7.	Socio-Economics	
	Housing Supply Effects	
7.22	"Affordable housing provision has not yet been determined."	This chapter of the ES cannot be complete without an assessment of the effects of the percentage of affordable housing. Gerald Eve's Town Planning Statement (para. 10.18) indicates that options involving 35% on-site provision were investigated and discounted at an early stage on viability grounds, and that (para. 10.21) the Financial Viability Assessment had appraised the development with 20%, albeit not in Phase 1. It seems that the ES has not kept pace with this.
	Educational Facilities	
7.58	"Summary information on primary school provision is set out in Table 7.10.... There is a +31 place surplus in capacity across all primary schools within a two mile radius."	Table 7.10 is incorrect. It shows a surplus/deficit of 0.
7.63		

Stag Brewery Mortlake		
Environmental Statement (ES)		Comments by Mortlake Brewery Community Group
7.64	<p>“Summary information on secondary school provision is set out in Table 7.11.... with a deficit of -14 places.”</p> <p>“The LBRuT School Place Planning Strategy 2017 states there were 2002 places in Year 7 across the District. However, these places were not diversely spread out...</p> <p>“A need for additional places has grown in the eastern half of LBRUT, at a faster rate than was previously forecast...”</p>	<p>Table 7.11 is incorrect. The headings and totals in columns 2 and 3 should swap places.</p>
7.66	<p>“It is forecast that the children who are most at risk of not being admitted to any of the three schools in the eastern half of LBRuT live in Kew, and east and north Barnes.... The Stag Brewery site has been identified as the only suitable location for a new school in the east of LBRuT.”</p>	<p>The ES does not mention that the LBRuT SPPS also states (P4): “it is apparent that demand for primary school places has plateaued...” It has been reported (not in the SPPS) that the take-up of primary school places Borough-wide in the current year is 2,174 as against a prediction in the SPPS of 2,476. If this downward trend continues the need for such a large school on the Brewery site must be questioned and reviewed.</p>
7.70	<p>The ES needs to note that the Barn Elms site offered the advantages of very good public transport access from east and north Barnes although not from Kew. But then the chosen site at the Brewery does not offer good public transport access from Kew either, the R68 bus being somewhat infrequent.</p>	
8.	<p>Transport and Access</p> <p>Local Bus Services</p>	
8.99	<p>“Table 8.20 shows the bus routes available within an 850m walking distance of the site.”</p>	<p>This table shows route 190 (not mentioned in para. 3.17 above) but not route R68.</p>
8.100	<p>Construction Trip Generation</p> <p>During this period (2022) it is forecast that 82 one-way vehicle trips would access the site per day, of which 57 one-way trips are likely to be undertaken by heavy goods vehicles (HGVs).”</p>	<p>Why has this assumption been made? Alternative access by barge mentioned in para 4.41 above needs to be further explored.</p>
8.135	<p>Transport-Related Development Proposals</p>	

Stag Brewery Mortlake		
	Environmental Statement (ES)	Comments by Mortlake Brewery Community Group
8.136	<p>"The number of car parking spaces proposed aims to achieve a balance between overprovision of spaces and therefore attracting more vehicles than necessary to the development and providing too little thus causing a negative impact on existing parking conditions within the local area around the site."</p> <p>"15 spaces for the proposed 6-form entry secondary school."</p>	<p>It would have been useful here to have explored the idea of less parking provision and maximum car club use thereby reducing the huge cost of building a flood-resistant basement (£78m in the FVA) which could release funds for a significant increase in affordable housing.</p>
8.160	<p>Driver Delay</p> <p>"It should be recognized that the Chalkers Corner junction would work considerably better in the future with the development in place compared to the existing and future scenarios with no development (including no Chalkers Corner works)."</p>	<p>The plan shows 10 spaces for the school plus 5 for disabled parking. It is understood from the School Travel Plan (para 4.3.1) that the number of spaces is dictated by a standard of 1 space per two members of staff. Does this mean that this large secondary school will have only 20 staff? Where will the staff come from, given the lack of affordable housing in the area, and how will they travel to work given the poor public transport access?</p>
8.164	<p>Pedestrian Delay</p> <p>"The location of the crossing points that were assessed... are shown on Figure 8.1."</p>	<p>Has the traffic modelling allowed for the latent demand which could cause the additional capacity to be very soon saturated?</p>
8.186	<p>Public Transport – Bus Service Capacity</p> <p>"The demand likely to be generated by the school is considered to be met by the take up of spare capacity on existing bus services or dedicated school bus services. The</p>	<p>These are all crossing points of roads within the site and its surrounds. They do not include the crossing of the railway on Sheen Lane both at ground level and via the footbridge. The ES must assess this.</p> <p>This is not acceptable. The assessment of bus service capacity needs to be done now, not at a later stage.</p>

Stag Brewery Mortlake		
Environmental Statement (ES)		Comments by Mortlake Brewery Community Group
	need for school bus services will be determined once the school's catchment is better understood.	There is no consideration in this section of the potential for a river bus (or duck rivercraft) service – and reasons for not pursuing further. It ought to be included for completeness.
9.	<p>Noise and Vibration</p> <p>Sensitive Receptors</p> <p>9.46 Existing receptors within the vicinity of the site are.... 5-68 Watney Road, 4-24 Williams Lane, 1-69 Lower Richmond Road, Chertsey Court and 139 Lower Richmond Rad.</p> <p>Construction Traffic Noise</p> <p>“82 one-way vehicle trips accessing the site per day, of which 57 one-way trips are likely to be undertaken by heavy goods vehicles (HGVs).”</p>	<p>Why have they not included residential properties in Mortlake High Street?</p> <p>Why has this assumption been made? Alternative access mentioned in para 4.41 above needs to be further explored.</p>
10.	<p>Air Quality</p> <p>Assessment Methodology</p> <p>10.8 The most significant pollutants associated with road traffic emissions, in relation to human health, are NO₂ and PM₁₀. LBRuT has declared an Air Quality Management Area (AQMA) for the entire borough for annual mean NO₂ and 24-hour mean PM₁₀, attributable to road traffic emissions ... This assessment therefore focuses on NO₂ and particulate matter (PM₁₀ and PM_{2.5}).”</p>	<p>In addition to NO₂ and PM₁₀ the Air Quality Framework and the First, Second and Third Daughter Directives (2004/107/EC) give effect to European Union obligations for benzene, carbon monoxide, lead, ozone and sulphur dioxide in ambient air as a requirement. Please provide the data on the above mentioned pollutants – as per the Convention on access to information, public participation in decision-making and access to justice in environmental matters (1998). All these pollutants are subject to monitoring and control under the Air Quality 4th Daughter Directive (2004/107/EC). Please provide a monitoring and mitigation plan actions for exceedances of the above pollutants in addition to PM₁₀ and PM_{2.5} as per the Air Quality 4th Daughter Directive.</p>

Stag Brewery Mortlake		
Environmental Statement (ES)		Comments by Mortlake Brewery Community Group
		<p>LBRuT's Air Quality Plan does not comply with <u>Directive 2008/50</u> and the <u>Air Quality Standards Regulations 2010</u>. It fails to require local air quality plans in local authority areas where NO₂ levels exceeded the limits imposed by the Directive but were expected to achieve compliance by 2021. The obligation in <u>art.23</u> of the Directive to achieve compliance as quickly as possible is specific to each air quality reporting zone.</p> <p>The proponent needs to ensure that there is in place a plan for real time monitoring and reporting on air pollution to meet legislative obligation as per Air Quality 4th Daughter Directive (2004/107/EC) and in view of The High Court ruling, which followed a legal challenge by the campaign group ClientEarth, which concluded that the Government's July 2017 plan was insufficient to bring the UK into compliance with EU air quality objectives within the 'soonest timeframe possible', as required by law.</p>
10.26	<p>Nitrogen Dioxide Sensitivity Analysis</p> <p>"A note on Projecting NO₂ Concentrations published by Defra provides a number of alternative approaches that can be followed in air quality assessments, in relating to the modelling of future NO₂ concentrations, considering that future NO_x/NO₂ road traffic emissions and background concentrations may not reduce as previously expected."</p>	<p>It would be useful to know what assumptions the consultants have made regarding what proportion of vehicles at the end date (2027) would be electric. This has not been stated.</p>
10.62	<p>Local Monitoring</p> <p>Table 10.11 includes London Road, Twickenham.</p>	<p>This location is not within 1km of the site.</p>
10.76	<p>Likely Significant Effects</p> <p>Table 10.12 shows ecological effects as high risk, for which "mitigation measures would be required to ensure that</p>	<p>The ecological high risk is not addressed in the mitigation measures shown in Table 10.17.</p>

Stag Brewery Mortlake		
	Environmental Statement (ES)	Comments by Mortlake Brewery Community Group
	adverse effects be minimized, reduced and, where possible, eliminated.”	
10.79	<p>Construction Vehicle Exhaust Emissions</p> <p>“The development is predicted to result in a negligible impact at all receptors apart from at Chalkers Corner where a moderate adverse impact is predicted at Receptor 20 (Chertsey Court) and a substantial adverse impact at Receptor 21 (139 Lower Richmond Road).”</p>	<p>The title of this section is misleading as it sounds like it is referring to the exhaust emissions from the 82 construction vehicles accessing the main development site every day in 2022 (see para 8.100 above), whereas it actually refers to all traffic on the road during the construction works at Chalkers Corner in 2021. The impact at Receptor 21 is not surprisingly substantial adverse as the traffic is likely to be more tightly packed on Lower Richmond Road during the construction works.</p>
10.96	<p>Completed Development</p> <p>“At Chalkers Corner there are two receptors predicted to be above the annual mean NO₂ AQS objective of 40mgm³.... The development does not result in any new exceedances of the NO₂ AQS objective.”</p>	<p>This depends on what assumptions have been made about improvements in NO₂ resulting from an increase in electric vehicle usage.</p>
10.100	<p>Table 10.15 show results of the sensitivity analysis in relation to NO₂ assuming no improvement in NO_x and NO₂: Receptor 20 (Chertsey Court) – substantial adverse Receptor 21 (139 Lower Richmond Road) – substantial beneficial.”</p>	<p>This is not surprising as the reconfigured road has moved closer to Chertsey Court.</p>
10.109	<p>“A new wall and new intensive green planting are proposed outside Chertsey Court.... These inherent measures.... will improve the predicted air quality....”</p>	<p>There is no indication of the time it will take for the new planting to become effective.</p>
10.113		<p>Please provide projected car, truck and motorbike traffic numbers used to establish non-significant impact</p>

Stag Brewery Mortlake		
	Environmental Statement (ES)	Comments by Mortlake Brewery Community Group
10.114	<p>“Using professional judgment.... The overall effect of the development on local air quality is considered to be insignificant.”</p> <p>“It is considered that the effect of introducing future residential and school uses to the site is insignificant.”</p>	<p>conclusion. If estimated please provide criteria used in running the model as per the Convention on access to information, public participation in decision-making and access to justice in environmental matters (1998). Based upon the ruling [2018] EWHC 315 (Admin); [2018] A.C.D. 40; the conclusions made as to the insignificant impacts to air quality conditions within the development is an unsafe conclusion. No analysis of school traffic has been attempted, no analysis of increased train traffic and therefore increased delays and increased emissions at the Mortlake train barriers have been attempted. The analysis lacks the influence of solar light on the production of NO₂ and NO_x in addition to no mention of ozone. Please address as per Human Rights Act 1998.</p>
10.115	<p>Nuisance Dust</p> <p>“The management controls would prevent the release of dust entering into the atmosphere and/or being deposited on nearby receptors, including the River Thames.... The management controls would include:</p> <ul style="list-style-type: none"> Record all dust and air quality complaints, identify causes, take appropriate measures to reduce emissions in a timely manner.... 	<p>Please provide a time frame 24 or 72 hrs to respond to and deal with dust complaints. “Timely manner” is subjective and open to interpretation and does not provide the public with assurances dust complaints will be addressed as per Human Rights Act 1998. Please provide required time period to correct non-compliant air quality activities and consequences of multiple day exceedances. Please also provide means by which public has real time data, i.e. website, so that the project remains in compliance with air quality management plans etc as per Convention on access</p>

	Stag Brewery Mortlake	
	Environmental Statement (ES)	Comments by Mortlake Brewery Community Group
	<ul style="list-style-type: none"> • Hold regular liaison meetings with other high-risk construction sites within 500m of the site boundary to ensure plans are co-ordinated and emissions minimized. • Plan the site layout so that machinery and dust causing activities are located away from receptors.... • Avoid the use of diesel or petrol-powered generators and use mains electricity or battery powered equipment where practicable. • Ensure equipment is readily available on the site to deal with dry spillages. Clean up spillages as soon as reasonably practical after the event using wet cleaning methods. 	<p>to information, public participation in decision-making and access to justice in environmental matters (1998). "Within 500m of the site" is not sufficient to address regional impacts of construction. Propose that the limit should extend through the Borough as construction along any of the other major roads will disproportionately impact those living along the construction routes. According to the modeling, the site is surrounded by sensitive receptors, both human and ecological. The suggestion that dust will be diverted away is questioned. How will this plan be accomplished and implemented in view of its sensitive location? The proposal to use non-diesel construction equipment where <u>practicable</u> is in conflict with EU Regulation 2016/1628 [3478] which specifies emission requirements for all categories of compression ignition (diesel) and positive ignition mobile non-road engines, replacing Directive 97/68/EC and its amendments. Please amend text to be compliant and remove reference to practicable. Control of Major Accident Hazard Regulation 2007 (reference 5) and the Environmental Permitting Regulations 2010 (reference 6) – under these regulations you have a statutory obligation to have an Accident Prevention plan in place and response. Also, please note in the documents that Environmental Damage Regulations (EDR) apply which force polluters to prevent and remedy environmental damage they have caused. They follow the 'polluter pays' principle.</p>

Stag Brewery Mortlake		
Environmental Statement (ES)		Comments by Mortlake Brewery Community Group
10.116	<ul style="list-style-type: none"> Ensure vehicles entering and leaving the site are covered to prevent escape of materials during transport.” <p>“Such measures are routinely and successfully applied to major construction projects throughout the UK and are proven to reduce significantly the potential for adverse nuisance dust effects associated with the various stages of demolition and construction work. Therefore it is considered that the likely residual effects during the demolition and construction works due to fugitive emissions on all sensitive receptors (human and ecological) would be insignificant.”</p>	<p>As foundation work will be carried out, please provide emergency plan for spills into the river Thames and deployment of river booms as per the Pollution incident response plan section 5.</p> <p>How is stormwater being managed and how will the project ensure no pollution discharges into the river Thames as a result of construction or after development? Please provide a stormwater prevention protection plan as per the EIA guidance for construction.</p> <p>Please include hazardous waste transport and storage plan in the construction documents as per BAT and EDR regulations and include in 'Pollution incident response plan Section 5'.</p> <p>This statement is challenged in that as many construction projects are fined due to significant impacts after implementation of dust monitoring plans as those found appropriate. Assumption that impacts are insignificant are not supported by the evidence presented. Please provide evidence to support this claim as per Convention on access to information, public participation in decision-making and access to justice in environmental matters (1998).</p>
11.	Ground Conditions and Contamination	Not reviewed.
12.23	<p>Surface Water Drainage and Flood Risk Tidal and Fluvial Flood Risk</p> <p>“Despite being located in an area at a medium to high probability of tidal flooding, the site is protected up to the 1 in 1000-year standard by the River Thames defences. The</p>	<p>In terms of the overall assessment of flood risk, this is robust and picks up all the key points national and local policy would expect, i.e. no increase in flood risk. The ES</p>

Stag Brewery Mortlake		
Environmental Statement (ES)		Comments by Mortlake Brewery Community Group
	Thames Estuary 2100 Plan (TE2100) would ensure that the River Thames defences are not overtopped for the lifetime of any redevelopment on the site. Furthermore the site currently benefits from tidal defences along the river frontage.... from the site boundary walls and the Maltings building.”	seems also to be suggesting a betterment as a result of the provision of the new Thames Tidal defences, modelled finished floor levels in line with TE2100, safe access/ egress, etc.
12.65	“In summary the development would be designed to ensure all residential accommodation and most of the non-residential accommodation would be safe from tidal flooding. Exceptions.... one entrance to the basement car park located with the east part.... As such, the development is likely to result in an.... effect of minor significance.”	Noted.
12.70	“Surface water runoff from the north east of the Stag Brewery component of the site would discharge by gravity to the River Thames.... Surface water runoff from the remainder of the.... site would discharge via gravity to the Thames Water sewer network in the surrounding highways....	It would be worth seeing what the response to the capacity check with Thames Water is. The separate EIA study section 4.3.3. states that a pre-development enquiry has been submitted, but presumably the response was not ready in time for the application?
12.71	Approximately 2,655m ³ of attenuation storage would be required, accounting for a 40% increase in rainfall intensity due to climate change.... provided via attenuation tanks.”	Noted – this appears sufficient to accommodate runoff from the all-weather pitch.
	Mitigation Measures	
	Surface Water	
12.97	“Temporary stockpiling of materials would be located away from the Thames and drains and drums and barrels would be stored in designated bunded safe areas within the site compound to reduce the risk of silt and pollutants entering the surface water drainage system.”	Noted.
	Risk to Occupants	

Stag Brewery Mortlake		
	Environmental Statement (ES)	Comments by Mortlake Brewery Community Group
12.106	"A self-activating flood barrier would be required for the entrance to the eastern basement car park from Mortlake High Street."	This is not explained in the supporting text but it is noted that details appear in the appendix.
13.	Ecology	
	Surveys	
13.10	References to Appendices for survey results.	It would have been helpful to have seen more detail of the surveys without having to refer to appendices.
13.24	"No roosting bats were found during the emergence/re-entry surveys...."	Even so the ES has considered mitigation measures in the expectation that there could be roosting bats, which is commended.
	"No black redstarts were found during the surveys in 2016."	No mention of all other species found on the surveys.
	The Works: Effects on Bats	
13.49	"Some pruning of understorey vegetation to open key views would be undertaken along the towpath. However, this would not have a significant effect on bats."	On the contrary, the pruning of such vegetation could diminish food supply for bats – and birds.
	Completed Development: Overshadowing	
13.53	The likely effect of overshadowing to existing surrounding amenity areas (i.e. the River Thames).... is therefore insignificant.	On the contrary, the proposed buildings are taller than the existing and the overshadowing will increase.
	Completed Development: Effects on Bats	
13.55	"The completed development is not anticipated to have a direct impact on existing foraging and commuting bats using the northern boundary of the.... site given the retention of trees."	Not all the trees on the northern boundary of the site behind Thames Bank are being retained.
13.55	"The completed development would have a.... beneficial effect of minor significance."	This is debatable.
13.59	"Both the existing sports field and proposed sports pitch hold little habitat value for bats."	The sports field is used by many other species as food resource and there are regular sightings of herons,

Stag Brewery Mortlake		
Environmental Statement (ES)		Comments by Mortlake Brewery Community Group
13.66	<p>Completed Development: Mitigation</p> <p>Appropriate mitigation in the form of a Landscape and Environmental Management Plan would be implemented to manage and ensure the permanence of the roosting, foraging and commuting habitats.</p>	<p>starlings, stag beetles etc. Bats forage along the tree line where the school planned. Grass is natural and a food source; the proposed MUGA is neither.</p> <p>Who would be responsible for this? Lots of issues to cover in this long-term.</p>
14.	<p>Archaeology</p> <p>Non-Designated Heritage Assets</p>	
14.33	<p>"The site of the palace of the Archbishops of Canterbury is known to have been present by 1099 until the 16th century.</p>	<p>The ES has recognized the high importance of these two sites and the need to allow time for rescue archaeology. No further comment.</p>
14.35	<p>"Remains of a Renaissance mansion owned by Thomas Cromwell, Earl of Essex (Cromwell House c. 1491-1857) may survive within the north western boundary...."</p>	
15.	<p>Built Heritage</p>	
15.60-62	<p>The Former Hotel Building (BTM)</p> <p>"The development would reinstate the historic hotel use.... externally the appearance of the heritage asset would remain largely unaltered.... effect of minor significance."</p>	<p>Agreed, no comment.</p>
15.63-66	<p>The Former Bottling Building (BTM)</p> <p>"Construction of a new building behind the retained façade.... gym, retail unit, office space.... new windows.... effect of minor significance."</p>	<p>Agreed, no comment.</p>
15.67-70	<p>The Maltings Building (BTM)</p> <p>"Conversion of the building to residential apartments and community space.... new floors would be inserted.... largely consistent with the floor levels that existed historically,</p>	<p>It would be useful to have an explanation for why certain windows are to be elongated.</p>

Stag Brewery Mortlake		
	Environmental Statement (ES)	Comments by Mortlake Brewery Community Group
15.83 -84	<p>albeit that two of the floors will be double height.... Several existing windows are proposed to be elongated.... effect of minor significance.”</p> <p>Thames Bank (Grade II Listed Buildings and BTMs) “The development would be an enhancement when compared to the existing situation.... would also be in keeping with the scale of development that would have existed historically along the riverfront.... effects of minor significance.”</p>	<p>It is noted that the proposed development behind Thames Bank rises to 3 storeys and that most of the existing trees along this boundary are being saved. The impact on Aynescombe Cottage within the Mortlake Conservation Area needs careful attention.</p>
16. 16.11	<p>Townscape and Visual Effects Visual Assessment “The photographic locations for each viewpoint were agreed via consultation with LBRuT. This included a walkover of the local area surrounding the Site with representatives of LBRuT on 4th July 2016.”</p>	<p>Why were views of the Chertsey Court OOLTI at Chalkers Corner junction not included? Presumably because the proposed reconfiguration of the junction was not on the agenda at the time? Such views ought to be included – and indeed have been, albeit not in this report. The ES needs to show the visual impact of removing trees from the front gardens of Chelsey Court which are designated an OOLTI and the transference of the displaced part of this OOLTI onto the opposite side of the road. It needs to argue the case for doing this, which is highly questionable, and it has failed to do so.</p>
16.77	<p>Likely Effects of the Completed Development on Views 1. “For many residents and road users in the locality this would provide an extent of soft edge to the development.” 4. “The development would be conspicuous by the height and mass of new built form against the skyline....”</p>	<p>No mention here of the school building encroaching onto the wide open space of the playing fields OOLTI. This is because the proposed buildings rise to 7 storeys sheer without any setback. The ES should note that the</p>

Stag Brewery Mortlake		
Environmental Statement (ES)		Comments by Mortlake Brewery Community Group
		Planning Brief had stipulated "stepping back from river". This comment also applies to views nos. 5, 6 and 7.
17.	Wind Microclimate	
	On-site conditions	
17.52	"The assessment... has demonstrated that even in the absence of mitigation the majority of the Stag Brewery component of the site... would be suitable for its intended pedestrian activities."	It is noted that the assessment has included wind tunnel tests of thoroughfares, entrances to buildings, ground level amenity areas and balconies. No comment.
	Off-site conditions	
17.61	"Surrounding conditions with the completed development in place would generally be the same as existing conditions, therefore no mitigation measures would be required and the likely residual effect would be insignificant."	It is noted that the assessment has included wind tunnel tests of the same in all surrounding areas including Mortlake Green, the towpath and River. No comment.
18.	Daylight, Sunlight, Overshadowing and Light Pollution	
	Table 18.11 Completed Development	
18.144	Daylight to surrounding receptors – insignificant except: Butler House, Aynescombe Cottage – minor significance. Rann House, 2-6 Williams Lane, Churchill Court and Jolly Gardeners – minor to moderate significance. Sunlight to surrounding receptors – insignificant. Overshadowing on surrounding amenity areas – insignificant. Overshadowing on proposed amenity areas – insignificant to moderate significance but detailed design during reserved matters may result in reduced maximum extents. Light pollution – insignificant.	Noted. Noted. Noted. The towpath is one of the surrounding amenity areas and must surely expect to be overshadowed? This sounds unbelievably optimistic?

Stag Brewery Mortlake		
Environmental Statement (ES)		Comments by Mortlake Brewery Community Group
		No assessment given of proposed floodlighting of all-weather sports pitch.
19.	Cumulative Effects	No comment.
20.	Mitigation Measures and Likely Residual Effects	No comment.
10. Air Quality (Additional Comments on Appendix)		
Table A7	24 hours	If the school is for over 1000 pupils why are only 543 daily trips accounted for, which is 272 pupils being dropped off and picked up. How will this assumption be enforced and what consequences will be applied if this is shown to be an underestimation of the trips?
Table A7	24 hours	For the active community of Mortlake assuming 8 trips a year by car to the area is a gross underestimation. Please provide means and methods of how these numbers were obtained as per Convention on access to information, public participation in decision-making and access to justice in environmental matters (1998)
Table A7	24 hours	Please provide data for all instances of trip traffic proposed in Table A7. According to the UK Government white papers "The UK Treasury recognizes and has published guidance on the systematic tendency for project appraisers to be overly optimistic in their initial estimates" and the public has a right to be informed about how this data were generated as per Convention on access to information, public participation in decision-making and access to justice in environmental matters (1998)
10.183	Lack of adjustment factors applied to PM10 and PM 2.5 results	Lack of experimental data and lack of application of adjustment factor invalidates the model of predicting

Stag Brewery Mortlake		
Environmental Statement (ES)		Comments by Mortlake Brewery Community Group
		PM10 and PM 2.5 data. Data should be collected from the proposed development site as per the Air quality 4th Daughter Directive (2004/107/EC)
10.186	Microclimates are not included in the model predictions.	Model options: ADMS 5 has a number of model options including: dry and wet deposition; NOx chemistry; impacts of hills, variable roughness, buildings and coastlines; puffs; fluctuations; odors; radioactivity decay (and γ -ray dose); condensed plume visibility; time varying sources and inclusion of background concentrations. Microclimates are included in the functions of the model. Please rerun the model to include the contribution in this analysis.
10.186	Modelling margin of error and validity of model used	What is a margin of error in the computer models used to predict air quality pollution levels. The validation of the model section states that levels of inaccuracy exist, what are the margins and are the greater than or less than other models used as standard practice in the profession.
10.186	Correlation coefficient	The author suggests that the model is accurate although he data presented for the correlation coefficient indicates an under estimation of the values. The values are underestimates and should be presented as such in the body of the document, not in the technical appendices.
Table A17	Statistical calculations	The results are based on modeled values and therefore to expect a statistical difference between unadjusted and adjusted values is nonsensical. The model should compare measured values and modeled values for the verification to have any value in predicting air quality conditions. Please provide spreadsheets with data as per Convention on access to information, public participation in decision-

Stag Brewery Mortlake		
Environmental Statement (ES)		Comments by Mortlake Brewery Community Group
		making and access to justice in environmental matters (1998)
10.182	Decision not to apply further refinement of the air quality model	Please provide the results from the model verification procedure to be analyzed as per Convention on access to information, public participation in decision-making and access to justice in environmental matters (1998)

Chapter 11 – Other Procedural Matters

This chapter provides an overview of the engagement of the developers with the community prior to the submission of the planning applications.

The MBCG with other members of the community has been involved in the consultation process. While the developers arranged several consultation meetings, these CLG meetings left little room for discussion as they were mainly monologues with the architects and consultants presenting their designs.

We acknowledge that there were alterations to the design during this process, however, these just realigned the design to accord with the 2011 Planning Brief and other planning policies and/or were subsequently reversed.

We feel that there have been inadequate responses on the main issues that were raised and dominated most meetings.

We would draw the Council's attention to the following.

1. Chapter 4, section 8 – this is a summary of how the masterplan was informed by the consultation

This accurately records that four of the most common issues raised throughout the consultation were:

- proposal for secondary school with 1200 pupils
- level crossing at Mortlake Station
- On street parking in the surrounding area
- Traffic management at Chalker's corner
- Cumulative density of the development
- Loss of sports fields

The text then states the following:

"In response the Applicant has proposed a series of associated road interventions outside of the site boundary that are to be agreed and secured through an agreement with the Council."

Comment: This one page alone is good evidence of how inadequate the Developer's response is to the concerns raised by the community. It is totally insufficient to argue that the proposed road interventions are an adequate to address the four points summarised immediately above. Furthermore, there is no reference whatsoever anywhere in this document to any response from the Developer about the implications of the plans for the level crossing at Mortlake Station.

2. Page 58 – this captures public views as at **February 2018**, AFTER the developer had made adjustments. People were given the chance to write in their own comments in open-ended questions.

Transport and Traffic: Of the 566 people who chose to raise this, 443 or **78%** continued to have concerns.

New homes, heights and density: Of the 502 people who voluntarily raised this 338 or **67%** continued to have concerns.

School: 419 people chose to raise this of whom 342 or **81%** still had concerns at the end of the process.

Environment: Of the 44 people who chose to raise this, 44 or **100%** continued to have concerns

The pie charts alone do not adequately reflect the volume of comments on different topics and we would urge the Council to note the **numbers** cited on each pie chart.

3. Chapter 8 (page 67 onwards) provides a useful summary of the points raised at each of the three successive consultation stages and the action taken by the developers.

Page 67 gives a narrative summary of the concerns raised and the Developer's response. Section 8.2 at page 67 is evidence by omission of how totally inadequate the Developer's response is to traffic concerns. For example no mention whatsoever is made of the impact of the development on the Level Crossing at Sheen Lane/Mortlake station and there is no response on concerns seeking improvements to public transport or actions to reduce traffic arising from the development.

4. Page 75 is most telling. It captures in a table the concerns and action taken at the final stage (July 2017-February 2018), stage 3. From this table it is clear that even at the end of the process, the consultees did not consider that the action taken by the Developer sufficiently addressed their concerns. Furthermore, we consider the responses in the 'Action Taken' column to the remaining concerns to be wholly insufficient to address the depth and number of concerns.

5. Specifically the table on page 75 it states

"People expressed continuous concerns about the traffic impact and the capacity of the proposed traffic interventions to address the issue."

The action taken in response to this is listed on the same table as "Transport consultants PBA tested the proposed interventions with

additional strategic modeling in collaboration with TfL to confirm that the interventions suggested will in fact mitigate the traffic impact of the development”

This is wholly inadequate. It is wrong and incorrect to state that because something is “modeled” that “it will *in fact* mitigate” the traffic impact. Models are built on assumptions and assumptions can be adapted to produce different outcomes – we would ask the developers to share a range of outcomes. Furthermore, it defies all logic to argue that widening one road junction at one end of the development mitigates “the traffic impact of the development” - when no attention is given to (a) the impact of entry and exit into the site, ie site residents turning right onto Lower Mortlake Road (b) the impact on the Lower Mortlake Road of a higher volume of traffic backing up when the level crossing is closed or (c) the access to their homes for existing Mortlake residents living between Sheen Lane and White Hart Lane and (d) the implications for public transport buses of being stuck in predictable heavy and slow moving traffic.

6. The table on page 75 states “There are still concerns about the density being too high/there being too many housing units”.

The action noted in response states that “the number of housing units has been reduced from the first and second masterplan.”

This is not acceptable as a final response; the density and massing of the site are still too great for the tightly bounded nature of the site and the fact that consultees still had concerns demonstrates at the end of the process demonstrates that the marginal adjustments made by the developer are not sufficient to take account of local views of the impact of the development on the surrounding area.

7. Finally the document refers to meetings held with a CLG – a ‘community liaison group’ convened by soundings. We wish to make clear that the time spent in these meetings was largely dominated by the Development team giving presentations and filling the time themselves, with very little time for discussion or liaison. Indeed this issue with the meetings was repeatedly raised by those attending but the format was never changed.

Chapter 12 - Conclusions

Over the years Mortlake has lost its community/village feel. With the building of a dual carriageway, the demolition of six of the original eight pubs and the recent building of high cost housing, the heart has been ripped out of Mortlake village. There is now only a small row of shops, two of which are boarded up and the High Street needs refreshing. There is an infrequent bus service passing through between Richmond and Hammersmith and no transport link to East Sheen. Community is about people and their environment and integrating the old with the new. For Mortlake the development of the brewery site brings a real once in a lifetime opportunity to enhance the locality and potentially put to use a building, such as the Maltings, for community activities.

The proposals fail to activate and animate Mortlake High Street, missing opportunities to sensitively create strategically placed openings to the streetscape frontage of the Hotel/Bottling Building and instead introduce negative features on the new block facing the High Street including ramps and a sub-station which make no contribution to animating the neighbourhood.

We remain supportive of the 2011 planning brief's proposals which has a good balance of housing (including affordable), commercial/retail units, green spaces extending from Mortlake Green to the river, while retaining some of the historical aspects of the area. In complying with the principles of this brief, the development would be an asset to the local community and were influential in producing the 2011 Stag Brewery Planning Brief.

In summary, we have the following objections to the three Stage Brewery Planning Applications:

- The combined density of the scheme is too high. The site is not big enough to support 897 residential units a 1,200 pupil secondary school and 11,616 sq. m. of commercial uses. This does not comply with Local Plan policies on local character and design quality, DM DC1 and LP1, in terms of scale, height, massing and density. One of these dimensions needs to be reduced for the development to be sustainable.
- If a school of this size is required on the site (as to which there remain important questions to be resolved), then the housing and commercial use must reduce.
- The plot allocated for the school is not large enough for the number of pupils and is still partially sited on the playing fields. This is not an inner-city location. Other local schools have significantly more space. An MBCG consultant is investigating this and its conclusions should form part of the evidence base.
- The proposed development is too densely populated and is three times denser than the surrounding areas, 2.5 times more dense than the GLA guidelines and materially exceeds the proposed housing densities set out by the Local Plan policies mentioned above.
- The heights of some of the buildings significantly exceed those set out in the 2011 Planning Brief and the site does not in all cases diminish in height at the perimeter as specified in the Planning Brief. The Planning Brief was clear: if extra density is required for viability, it should be located towards the centre of the site where taller buildings are currently found.
- The compressed layout and building heights place many, and large proportions, of the external open spaces including the towpath in permanent shadow. This does not comply with Local Plan policies on amenity and living conditions, DM DC5 and LP8. There is also an impact on existing residents: Building 21 is extremely close to the properties on the Thames Bankside and Buildings 18 to 20 to Williams Lane and Wadham Mews and the other

residents to the north west of the site. Any detrimental effect (loss of light) on existing properties, particularly in the north west of the site, must be further assessed.

- We question the viability of the number of retail outlets, cinema and gym given the proximity of similar businesses in East Sheen. There is a successful cinema in Barnes and a proposed gym development in Sheen.
- The 40% increase in Mortlake residents and the new users of the school and retail outlets will have a significant impact on the local transport and traffic, and would not comply with Local Plan policies on transport, CP5 and LP44. Our own survey suggests that the number of people and traffic movements have been underestimated and we do not believe that the solutions adequately address the impact.
- The Chalker's Corner changes will not resolve the issue of increased traffic but will simply attract further through traffic when other roads are congested. This is a strategic junction which requires a strategic solution from TfL, the council and the developer.
- The increased traffic and movement of this junction will have a significant impact on pollution levels which already exceed European levels. There is no assessment of the other toxic gases (benzene, carbon monoxide, lead, ozone and sulphur dioxide) in accordance with EC Directives and their impact on air quality.
- There is no public transport strategy. None of this complies with Local Plan policies mentioned above, CP5 and LP44. In the current era when we need to encourage a move away from car use, there needs to be proposals which seriously consider how public transport can be improved in the local vicinity.
- There is no plan to address the pedestrian and vehicular risks at the Sheen Lane level crossing. This is a high-risk crossing, as identified by Network Rail. The development at the Stag Brewery, particularly from the school, will increase numbers of pedestrians and cyclists seeking to cross the railway either by the footbridge or at road level is of very serious concern and must be addressed by including some material improvement in safety conditions at the level crossing. Again this does not comply with Local Plan policies CP5 and LP44 mentioned above. As a minimum, the planning application needs to address this in conjunction with the Borough and Network Rail; a significant contribution of the costs of providing this material improvement should be secured through a s106 agreement.
- The 2011 planning brief clearly states that the OOLTI land on the playing fields will be retained. The developer has not adequately demonstrated that all the criteria (quantum, quality and openness) have been met to allow for the building on this land. A 3G pitch and floodlighting are opposed. This does not comply with Local Plan policies DM OS3 and LP14.
- The proposed provision for affordable housing provision is too low, too concentrated in one area and delivered too late in the development. The proposed 20% is lower than the target set by the council and does not comply with Local Plan policies DM HO6 and LP37. Our examination of the Financial Viability Assessment strongly indicates that the developers have sufficient margin to offer up to 35%. There also needs to be certainty that the affordable housing commitment will be delivered.
- There is no surgery or pharmacy in Mortlake. The 40% increase in Mortlake residents will increase the strain on existing NHS services in Sheen. Additional provision of NHS facilities must be provided with this development as indicated in Local Plan policies CP17 and LP30.
- There is no solution to primary school provision, either for new residents of the site or for those existing residents who will be displaced out of catchment through the new development.

We urge the council to ensure that these issues are addressed.

This page has been left blank.

Appendices

Appendix
Chapter 5 Transport Appendix 1 - MBCG's Manual and Video Surveys
Chapter 5 Transport Appendix 2 - MBCG's Forecast of Travel Demand due to the Development
Chapter 5 Transport Appendix 3 -Issues to do with the Sheen lane Level Crossing
Chapter 5 Transport Appendix 4 - Further Technical Comments
Chapter 5 Transport Appendix 5 - MBCG's Letter to local MP Zac Goldsmith
Chapter 7 Education Appendix 1 - Glossary

Chapter 5 Transport Appendix 1 - MBCG's Manual and Video Surveys

- 1 The queue lengths measured are significantly influenced by the level crossing barrier closures – both its frequency and duration. Additional factors affecting queuing in Sheen Lane include the presence of vans and lorries parked or loading south of the railway, the interaction of Vernon Road traffic and the often high numbers of pedestrians, buggies and cyclists concentrated in the confined and exposed areas on each side of the barrier. Often, but particularly during the longer periods of barrier closure, the whole of the local road network is filled with stationary or slow-rolling queues of vehicles. These queues would extend to the Upper Richmond Road, White Hart Lane and to Mortlake Green (the latter from Chalker's Corner).
- 2 The Southbound queue in Sheen Lane approaching the barrier can extend beyond the Mortlake High Street roundabout and into both Mortlake High Street by up to 8 vehicles and into Lower Richmond Road.

Table A1.1 : Queuing in Sheen Lane, Mortlake High Street and Lower Richmond Road

<i>Time/Day</i>	<i>Max. Northbound Q South of Railway (vehicles)</i>	<i>Max. Southbound Q North of Railway</i>	<i>Max. Northbound Q North of Railway</i>	<i>Max. Westbound Q in Mortlake High Street</i>	<i>Max. Westbound Q in Lower Richmond Road</i>
Wednesday 17th May					
7.30-8.00	34	18	17	25++	34
8.00-8.30	27	17	17		46
8.30-9.00	58	19	17		49
9.00-9.30	49	17	17	25++	49
16.30-17.00	17	16	16	20+	36
17.00-17.30	28	14	12	50+	41
17.30-18.00	28	18	16	50+	40
18.00-18.30	31	16	19	20	39
Thursday 18th May					
7.30-8.00	23	18+	10	18+	88
8.00-8.30	19	16+	10	18+	104
8.30-9.00	22	18+	12	18	72
9.00-9.30	20	18+	12	18+	92
16.30-17.00	28	20	?	30+	
17.00-17.30	26	18	25	30	
17.30-18.00	26	33	14	25	
18.00-18.30	32	25	11	2?	

Table A 1.2: Manual Surveys Conducted at the Level Crossing

Date/Time	Number of Closures	% Time Closed	Number of Trains
17th May			
7.30-8.00	6	50	8
8.00-8.30	7	53	9
8.30-9.00	4	83	11
9.00-9.30	5	47	8
16.30-17.00	5	57	8
17.00-17.30	5	60	11
17.30-18.00	2	37	5
18.00-18.30	3	87	11
18th May			
7.30-8.00	7	63	14
8.00-8.30	6	60	10
8.30-9.00	5	43	8
9.00-9.30	4	50	7
16.30-17.00	7	60	9
17.00-17.30	7	57	8
17.30-18.00	5	27	6
18.00-18.30	8	90	16

Chapter 5 Transport Appendix 2 - MBCG Forecasts of Travel Demand due to the Development

Residential Units – Assume 668 standard units plus say 40% of the 150 “flexible” units equivalent to c. 728 units for traffic generation purposes but excluding staff trips for the care home for 70 people

Table A2.1: Residential M/Split AM Peak (8-9) Per Unit

Mode	Total Arrivals and Departures
Pedestrians	0.2
Cyclists	0.01
Vehicles	0.23 (Kew Riverside)- 0.42 (TRICS Outer London and Home Counties average)
OGV	
Taxi	
Bus	0.02
Train	0.02

Table A.2.2 : Secondary School M/Split AM Peak (8-9) Per Pupil – Source TRICS London Sites

Mode	Arrivals	Departures	Total
Pedestrians	0.38		0.38
Cyclists	0.1		0.1
Vehicles	0.17	0.15	0.32
OGV	0.001	0.001	
Taxi	0.002	0.002	
Bus	0.2		0.2
Train	0.15		0.15

The TRICS sites used here are secondary schools in Wood Green (1091 pupils) and Finsbury Park (850) pupils in locations with similar accessibility to the STAG brewery site. It is noted that PBA has been requested to use Christ’s, Grey Court and the Richmond Park Academy as comparator sites (with the RPA subsequently excluded as it apparently lacks a school travel plan). The submitted material includes details from Richmond upon Thames Council of the traffic generated by Christ’s school (770 pupils and 90 staff) and Grey Court (1246 pupils and 146 staff) operating with the benefit of travel plans. Even with similar travel plans in place for the proposed school on the Stag site, **some 300 vehicle movements** would be generated in the morning peak hour taking the average rate arising from these two schools

Chapter 5 Transport Appendix 3 - Issues to do with the Sheen Lane Level Crossing

NDC's Video Surveys Summary – Extract for the Period 8 – 9am

Number of Trains (2-Way) – 21~23

Number of Level Crossing Barrier Closures – 11~11

Maximum Closure Duration – 8.12~8.42 minutes

Total Closure Time – 34.7~44.5 minutes

Average Barrier Closure Time Before First Train – 95 ~ 115 seconds

Barrier Opening Times After Last Train – 17~23 seconds

Motorised Vehicles over Crossing (2-Way) – 408~449

Cyclists over Crossing (2-Way) – 61~79

Pedestrians over Crossing (2-Way) – 330~392

Buggies over Crossing – 22~33

Pedestrians Using Footbridge – 212~272

Cyclists Using Footbridge – 18~19

The 48 hour video record reveals several examples of what may be described as “notable incidents” or occasions when the risk of accidents between vehicles and pedestrians and of damage to the barriers appear high. Table A3.1 summarises these occasions.

Table A3.1 : Some Examples of High Risk Occasions Revealed in the 48 Hour Video Survey

<i>Time</i>	<i>17.05.17</i>	<i>Time</i>	<i>18.05.17</i>
<i>07.12.06</i>	<i>HGV reversing into Builder's merchant</i>	<i>15.45.24</i>	<i>Heavy pedestrian flows very close to moving vehicles</i>
<i>07.21.30</i>	<i>As above</i>	<i>15.57.15</i>	<i>As above</i>
<i>07.54.46</i>	<i>OGV on wrong side of road</i>	<i>17.11.51</i>	<i>Stationary OGV On wrong side beneath closing barrier (see screen shot below)</i>
<i>08.10.42</i>	<i>Car/cycle near miss</i>		
<i>08.29.22</i> <i>08.38.36</i>	<i>Heavy pedestrian and vehicle flows</i>		
<i>08.40.20</i>	<i>Stationary OGV beneath closing barrier</i>		

Below is a series of photographs showing the difficulties pedestrians already face in reaching Mortlake station and the level crossing area.



MBCG Forecasts for the Sheen Lane Level Crossing

School walk trips to Level crossing = $1250 \times 0.38 \times 0.5$ (South) = 237 plus -

School rail trips $1250 \times 0.15 \times 0.5$ (West-bound) = 94 giving a total of 331

School cycle trips $0.1 \times 1250 \times 0.5$ (South) = 62

School Vehicles over crossing $1250 \times 0.32 \times 0.33$ (South) = 132

Res Peds to Level Crossing = $c.728 \times 0.2 \times 0.5$ (South) = 73

Res Peds to Station = $728 \times 0.02 \times 0.33$ (West-bound) = 5. Total 78

Res Cyclists to level Crossing = $728 \times 0.01 \times 0.5 = 4$

Total Additional Peds to Crossing is $331 + 78 = 409$ plus those generated by the additional land uses.

Total Additional Cyclists to Crossing is 66 plus as above.

Res. Vehicles over Crossing $c.728 \times (0.23 \sim 0.42) \times 0.33 = 55 \sim 101$

Total Additional Vehicles over Crossing is 132 plus $(55 \sim 101) = 187 \sim 233$

Table A3.2 : Existing and Forecast Demand at the Level Crossing – 8-9am

Movement Type	Existing Demand (average of 2 survey days)	Existing Ground level and Bridge Total	Stag Brewery Demand (MBCG provisional)	Stag Brewery Demand (PBA)	Total Demand	% Increase
Pedestrians Crossing at Ground Level and using Footbridge	c.361 at Ground Level. c. 242 on Footbridge	603 (MBCG) 387 (PBA)	409 including footbridge	94 and 119 = 213 TN 18 Table 4.6	1012 (MBCG) 283 and 304 = 587~600 (PBA)	68 (MBCG) 52 (PBA)
Cyclists crossing at Ground Level and using Footbridge	c.70 at Ground Level. c. 24 on Footbridge	c.94 (MBCG)	66 including Footbridge	?	160 (MBCG)	70 (MBCG) ?(PBA)
Vehicles over the Crossing	428 (MBCG) 491 (PBA)		187~233 (MBCG)	71 (Table 4.2)	615~661(MBCG) 562 (PbA)	44~54 (MBCG) 15 (PBA)

Chapter 5 Transport Appendix - 4 Further Technical Comments

Any examination of the Transport Assessment reports is made very difficult given the poor indexing etc. of the material supporting the planning applications.

Trip Generation: We do not see any definitive sign off from RUT or TfL but clearly there has been much discussion and amendment. One concern is the comparability of TRICS sites and visitor numbers. The Stag site is highly severed by the river, railway etc. and this constrains vehicle access and trips given the lack of a walk catchment. If TRICS sites with high walk accessibility have been used then this could under-estimate vehicle trips. We find the vehicle trips for some ancillary uses such as hotel quite low and whether due regard has been paid to taxi trips may be an issue, especially given the remoteness of the site.

There is a forensic point relating to TRICS, which is use of main or final mode – the latter under-estimates car trips where people park in the surrounding area and are picked up as walk trips in final mode.

Highway Model: The use of the SoLHAM SATURN model accords with TfL guidance but does make the definition of impacts quite opaque. The TA admits that congestion in the 2031 future base results in traffic being held back in the surrounding network or diverted away from the site area. We would have expected the local junction models to be run with 2031 future base flows and development traffic manually added as per the trip distribution. The assignment of the 2031 + Development trips in the model obviously results in network rebalancing and probably results in a reduced marginal impact. We have rarely seen the PBA approach used in isolation from manual addition.

It is almost impossible to track the flows through the different scenarios as the TA mixes vehicles/pcus and 1/3 hour peak flows at various points – meaning that the difference between 2016 base flows and with development flows impossible to work out.

Highway Assessment: The TA takes the line that the future base is so congested that a) the development has little marginal impact and b) the two highway schemes mitigate the development impact. The LINSIG and ARCADY results bear this out and without a forensic analysis of the models it is difficult to dispute. The focus of the assessment is quite narrow and given that Sheen Lane obviously cannot take much more peak hour traffic we would have expected more to be said about traffic through Barnes High Street and along White Hart Lane. The junction models do not however assess interactions and this is where TfL must scrutinise the VISSIM models. There is significant interaction between the Chalker's Corner, Clifford Avenue and Sheen Lane junctions and I am not convinced that the Chalker's Corner scheme would mitigate this. It would be interesting to see how the reservoir between the Mortlake Road and Lower Richmond Road nodes works in practice – our feeling is that it will struggle to cope even with the improvement and this could increase queues north on Clifford Avenue.

Lower Richmond Road (LRR) is operating at about 93% in AM peak 2017 and both left and right turn lanes are similarly saturated.

The total flow goes from 699 to 766 in the 2031 base which results in saturation increasing.

However, with the Development, the LT increases by 14 pcus and the RT by 7 pcus – hence little change which is surprising given that the scheme generates 213 outbound movements in the AM peak.

The Chalker's Corner (CC) scheme only increases the left turn (LT) capacity by adding a flare and (somehow) increasing the green time by 7 seconds – this almost doubles sat flow and solves the capacity issue though the LT flow increases by a further 64 vehicles as a result compared to development scenario,

CC does not increase RT sat flow except for extra green so the flow only increases by a further 4 vehicles in the AM peak.

It seems rather convenient that the development itself only adds 21 total vehicles on LRR approach compared to 2031 Base – presumably a SATURN reassignment effect.

Also convenient that the RT flow hardly increases (324 with CC compared to 293 at present) when this movement cannot be improved without taking capacity out of the A316.

As stated previously we should request a sensitivity test of the development traffic just added to the 2031 base loads with no reassignment - with and without CC.

Further confirms our suspicions that the constrained nature of the site in terms of number of vehicle accesses and constraints on all of these routes is being hidden by the methodology used.

We have looked at school trip generation – 105 in/85 out in am peak by vehicle. The TA refers to using Travel Plan targets including Richmond Park Academy (RPA) but Appendix W comprises only an e-mail exchange with the Council officer. RPA does not have a Travel Plan and if these are targets then it is highly questionable that they can be achieved. Appendix V refers to most pupils walking or cycling, which is questionable given the barriers created by the river and railway.

The figures for Christ's School are probably not representative given proximity to 4 bus services but even here 770 pupils and 90 staff generate 150 inbound vehicle trips in the am peak – even if this is a target it seems to not have been applied to Stag. Again, I would argue that the specific constraints of the site will probably result in greater car use than has been estimated. Incidentally, the latest NTS gives a 23% car mode share for secondary schools.

Public Transport: We do not see what the strategy is for dispersing 1,250 school pupils in a very short space of time given that many will disperse east and west along the South Circular. An avenue most important to explore is the public realm and walk routes around the school eg Sheen Lane as these do not seem suitable.

PERS assessment – this is not very revealing with few links flagged up as amber. We are surprised that TfL has not requested a Pedestrian Comfort Level (PCL) assessment as per its guidelines. We are sure that this would show footways adjacent to the site struggling to meet the required Level B. There is no assessment in the TA of how Lower Richmond Road and Mortlake High Street would cope with 1,250 school children being dispersed in a short space of time. We strongly suspect that the crossings will struggle.

PERS does highlight some issues along Sheen Lane, especially south of the railway line where it notes footway restrictions due to shops and other clutter. I think this is highly relevant and should be flagged given likely future demand.

The TA is very poor in terms of explaining trip numbers – it does show 40 additional vehicles southbound on Sheen Lane in the am peak (TN16 – Table 4.2) which is significant in the context of the NR risk assessment.

Although these comments are focused more on pedestrians and though numbers are given for the pm peak the assessment only considers the am peak we think this is misleading as some of the worst problems along the South Circular are c. 4pm when most schools discharge.

The development attracts 1,619 person trips in the am peak – of these 607 are assessed to be pedestrians and 571 are bus trips, though none of the latter are assumed to cross the railway line.

The level crossing assessment concludes that only 75 out of 607 inbound walk trips cross the railway line of which 48 are school children – these split about 50/50 between grade and footbridge.

We find this highly implausible. There are 1,162 educational trips in the am peak inbound – 59% of school children are assessed to live south of the railway line (686). Their only option is to walk as neither the 209 nor 419 crosses the railway line. PBA suggests that these pupils use a number of crossings including the St Leonards Road and Glendower Ave footbridges. We find this difficult to believe given that the access routes to these footbridges are via residential streets and are convoluted – neither provides a direct route to the school.

We believe that in both the morning and evening children will gravitate towards Sheen Lane due to its density of newsagents, bread shops and cafes. They will also head to the chicken shop at the bottom of Richmond Park Avenue which is very popular. The same applies to bus trips – children will not board a 209 even if serving the site – they will head down Sheen Lane and then travel to Hammersmith or Richmond via the 33 route.

The other walk trips may have been similarly mis-assigned.

The precise walk trip distributions are not given in the TA so it is difficult to be precise but we think the numbers using Sheen Lane have been grossly under-estimated. The increase in walk trips northbound should be c. 300-400 rather than the 75 estimated and this would seriously impact on the footbridge capacity, which is marginal, and compromise safety on the road crossing. As a footnote, we doubt that PBA has considered the number of cyclists using the footbridge and its serious impact on capacity.

Regarding the Station Capacity Assessment it appears that PBA have ignored edge effects, especially on the footbridge and on the station platform and not discounted the seating or shelter as they should.

Chapter 5 Transport Appendix 5 - Letter to Zac Goldsmith, MP from MBCG
Mortlake Brewery Community Group

9th January 2018

Zac Goldsmith MP

House of Commons

Westminster

London SW1

Dear Mr Goldsmith,

RE : Sheen Lane Level Crossing and Chalker's Corner

We have received copies of both Network Rail's (NR) letter to you of 26th October and Dartmouth Capital Advisors' (DCA) letter of the 8th December both on the subject of the Sheen Lane level crossing.

Our group (Mortlake Brewery Community Group - MBCG) considers that the arguments expressed in DCA's letter seriously understate the likely impact of the latest Stag Brewery proposals on the level crossing.

Network Rail control this level crossing along with 5 others in the area from its base in Wimbledon we understand it is down to just one controller to monitor all these sites and that this system of control cannot always spot hazards on the tracks once the barriers are down. Our own video surveillance demonstrates the disturbingly high frequency of near miss incidents occurring at the crossing, some of which may not and could not have been spotted by NR. Our video evidence also shows just how the near miss incidents occur when vehicular and pedestrian congestion builds up.

With more demand for vehicles and an increase in vulnerable road users (pedestrians, school children and cyclists) it follows logically that the frequency of these incidents will increase and the risks of greater numbers of reportable accidents will rise broadly in proportion.

With regard to the pedestrian capacity across the railway, the nature of the problem is clear from our video evidence. At quiet times, the marked width for pedestrians over the tracks is barely adequate for passing other pedestrians with or without pushchairs being present. At times of congestion, both in peak periods and during the long barrier closure times, the steep footbridge is the choice of last resort for all but the fit, unencumbered and most impatient pedestrians and cyclists. In theory, the footbridge capacity itself is there but, as provided, it barely contributes to the pressures at the crossing other than for some station users.

Pedestrian Demand

Our own estimates of increased movement demand due to the current Stag brewery proposals are shown below. The range in overall demand stems from the case studies of similar developments elsewhere in London. The actual demand over the crossing depends on the origins and destinations of the users of the development. On this point we note that there are two other footbridges over the railway within 500 metres of Sheen Lane, however, research into schools transport in London and elsewhere shows that secondary age pupils prefer to walk in social groups where possible and are content with taking even longer routes to stay with their friends and pass by shops. For pupils needing

to cross the railway, Sheen Lane is likely to be the predominant choice particularly as a surface crossing is still available.

Current and Future Movement Demand at the Level Crossing – MBCG Provisional Forecasts

Our forecast of overall vehicle generation is, higher than that revealed by the developer's advisors as is the proportion of total traffic likely to use Sheen Lane. The "headline" increases in demand above the 2017 measured flows around the level crossing between 8am and 9am are forecast as follows:

- Pedestrians crossing the tracks at ground level and via the station footbridge – over 50% increase
- Cyclists crossing the tracks at ground level and via the station footbridge - over 65% increase
- Vehicles crossing the tracks – over 33% increase

It can be seen that the potential order of increased movement demand around the level crossing is highly significant and hence concerning. This level of demand is dictated by the proposed combination of the high residential content and the large secondary school. Reversion to the original development brief for the Stag site with the local primary school located there would mitigate this problem.

We appreciate DCA's offer to support Network Rail in finding a solution. Our view is that the responsibility for funding any solution here should rest jointly with the Stag site developer (for the housing and commercial development impacts), LBRuT/ESFA (given the large school's impact), any other developer of the station environs and Network Rail. A contribution may also be sought from the private consortium preparing the Heathrow Southern Railway Ltd. proposal.

A number of potential solutions may be envisaged but controversial or very costly interventions such as road closures, rail or road bridges are unlikely candidates. The provision of a ramped footbridge parallel to Sheen Lane, for example, may turn out to be both affordable, attractive and accessible than the current bridge but still subject to development and design challenges.

Traffic Flows and Speeds

We note that traffic modelling tests are still on-going with PBA (Transport advisers) and TfL after many, many months. Our Group has been promised a further meeting with PBA but this has yet to take place. We have been advised by TfL that a meeting would be appropriate with themselves, the developer, the Council and our Group.

More capacity provided at the Lower Richmond Road approach to the strategic junction of Chalker's Corner as is currently proposed, rather than on the main radial route (the A 316), will inevitably attract additional extraneous traffic in both peak and non-peak time periods on to the secondary/local road network (Mortlake High Street, Barnes Terrace, Sheen Lane and White Hart Lane. Without this intervention, the new traffic generated in the peak periods by the Stag proposals would actually serve as a deterrent to extraneous traffic using these local roads.

The high-level policy objectives enshrined into local planning here and in Richmond and London as a whole include the encouragement of sustainable transport solutions when development occurs. This suggests strongly that a partial "improvement" of local road traffic capacity to and from Chalker's Corner runs counter to these policy objectives. Any highways mitigation monies collectable to address this should be directed towards providing a strategic solution focusing on the A316 and possibly the A 205 routes. The opportunity to improve overall accessibility in the area should be taken by focusing entirely on increasing public transport services and improving conditions for cyclists and pedestrians.

I hope that you will see the need for an urgent discussion with the Council, the developer, TfL and Network Rail to seek to resolve the emerging problems here.

Yours sincerely,

Howard Potter Transport Planning Advisor, MBCG

and

Robert Orr Ewing, Chairman, MBCG

Copies to:

Aeneas Tole, Network Rail (for Stewart Firth)

Chapter 7 Education Appendix 1 – Glossary

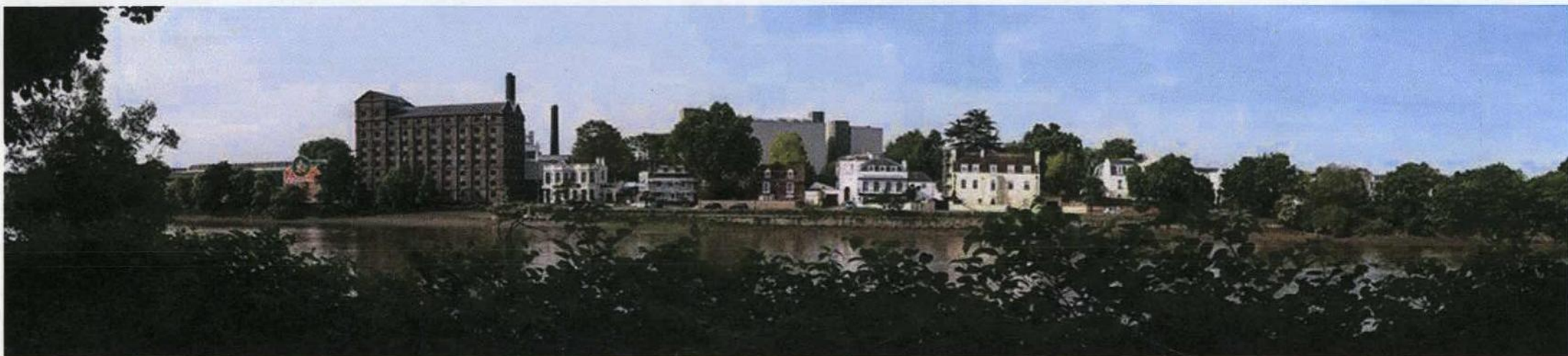
Term	Description
2015 Cabinet Papers	The minutes relating to and other documents (including the Richmond Council Revised School Place Planning Strategy 2015-2024) prepared for the LBRuT Cabinet meeting on 15th October 2015
3G Pitch	The proposed '3G' artificial full-sized playing field shown in the Plans occupying part of the two grass playing fields
APB	The adopted planning brief for the Site from 2011, a supplementary planning document
APB Scale and Uses Plan	The proposed design for the Site, including maximum acceptable scale of buildings, set out at Appendix 1 to the APB
Applicant	Reselton Properties Limited
Applications	Each of the following applications to LBRuT: <ol style="list-style-type: none"> 1. 18/0547/FUL (Main site – detailed and outline) http://www2.richmond.gov.uk/PlanData2/Planning_CaseNo.aspx?strCASENO=18/0547/FUL 2. 18/0548/FUL (Secondary school) http://www2.richmond.gov.uk/PlanData2/Planning_CaseNo.aspx?strCASENO=18/0548/FUL 3. 18/0549/FUL (Chalker's Corner works) http://www2.richmond.gov.uk/PlanData2/Planning_CaseNo.aspx?strCASENO=18/0549/FUL
AQMA	An 'Air Quality Management Area', designated pursuant to Part IV of the Environment Act 1995
Borough, or LBRuT	The London Borough of Richmond upon Thames
Development Masterplan	LBRuT's current 'Adopted Development Master Plan'
Education Act	Unless otherwise stated, the Education Act 1996
EIA	The Environmental Impact Assessment relating to the Applications (including its annexures), required pursuant to The Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 2011
Local Plan	The local plan, in its current form on the Borough website pending adoption, further revision and replacement, which will supersede the Development Masterplan
MBCG	The Mortlake Brewery Community Group
MUGA	The proposed 'Multi-Use Games Area' shown in the Plans occupying part of the two grass playing fields
NPPF	The National Planning Policy Framework, a material consideration in relation to planning applications pursuant to Sections 19(2)(a) and 38(6) of the Planning and Compulsory Purchase Act 2004 and section 70(2) of the Town and Country Planning Act 1990
OOLTI	'Other Land of Outstanding Townscape Importance', a designation afforded by the Development Masterplan and the draft Local Plan
Plans	The detailed proposals for the Site set out in the Applications to which these comments relate.
Secondary School	The secondary school the subject of Application 18/0548/FUL
Site	The Stag Brewery development site, identified as SA24 in the Local Plan
TCPA	Town and Country Planning Act 1990

Putting the heart back into Mortlake

AM3



Presentation to Council, 13 September 2018



Mortlake is different from its neighbours. It has a fascinating history – Mortlake tapestries, Archbishop's palace, pottery works, John Dee and his library, Thomas Cromwell's house, the list is long. Alongside all this has been the Brewery founded over four hundred years ago. It was the main employer and focal part of the community. But over the years Mortlake has lost its community feel. A dual carriageway was built in the 1960s, this destroyed the high street. The Brewery was mechanised with the loss of hundreds of jobs. There were eight pubs, now there are two. The heart has been ripped out of Mortlake over the past fifty years. All that is left of the busy high street is a small parade of shops, two of which are boarded up, and recently built high-cost housing. There is an infrequent bus service passing through between Richmond and Hammersmith and no transport link to East Sheen.

Mortlake has a high proportion of social and privately rented housing. Most of the original occupants have lived there all their lives. When they die, young people buy these flats and then move away when they have children.

We welcome the new development. We want to see the heart put back into Mortlake. But we want the development to be in proportion, to be the best possible development so that the old and the new mix well and we are not overwhelmed by its scale.

Agenda



Mortlake Brewery Community Group – Background

Kate Woodhouse

The Planning Applications

Tim Catchpole

Assessment of Development

Peter Eaton

Assessment of Traffic Impact

Howard Potter

The Secondary School

Geoff Woodhouse/
Geoff Stanton

Conclusions

Kate Woodhouse

Objectives

A development that puts the heart back into Mortlake

To protect and enhance Mortlake's green spaces for all to enjoy

Safe and sustainable solutions to reduce traffic and improve quality of life

Housing density we can all live with

Community, educational and NHS facilities for everyone

The Mortlake Brewery Group was formed in 2009 and worked on the Planning Brief. These objectives were drawn up after discussion at a public meeting.

Stakeholder and Community Engagement



Developer on residents' concerns

MP, Councillors and officers

Network Rail on Sheen Lane crossing safety


Richmond Housing Partnership on Chertsey Court and affordable housing

Richmond GP Alliance, Clinical Commissioning Group (CCG) on community health needs

Local secondary school heads on school

Regular public meetings of 100+

Contact via mailing list of 700+

 website and social media
#LOVE MORTLAKE

Leaflets, posters and stalls at local fairs

Local media

Agenda

- Mortlake Brewery Community Group – Background Kate Woodhouse
- **The Planning Applications** **Tim Catchpole**
- Assessment of Development Peter Eaton
- Assessment of Traffic Impact Howard Potter
- The Secondary School Geoff Woodhouse/
Geoff Stanton
- Conclusions Kate Woodhouse

Stag Brewery, Mortlake


#LOVE  MORTLAKE



Planning Brief 2011



Key points:

- community hub and housing in the east served by loop
- housing and primary school in west served by loop
- retention of playing fields
- extension of Mortlake Green to river
- retention of historic buildings.

No indication of number of housing units but consultation document referred to 390-560 depending on significance.

Planning applications, February 2018



The Brewery site

Care Village and Nursing Home

- 150 units which could be residential
- 80-bed nursing home

School

- 1,200 students plus staff

Residential

- 443 units east side
- 224 units west side
- 667 units in toto

Playing Field

- Single all-weather pitch floodlit



Community Use

- Community Centre
- Community Rowing Club

Commercial

- 2,500 sqm retail,
- 3,800 sqm cafes/restaurants/pubs

Offices

- 2,000 sqm

Hotel

- Boutique 20rooms

Cinema

The basement carpark


#LOVE MORTLAKE

Car parking

- 679 spaces
- 664 in basement
- 15 at ground level

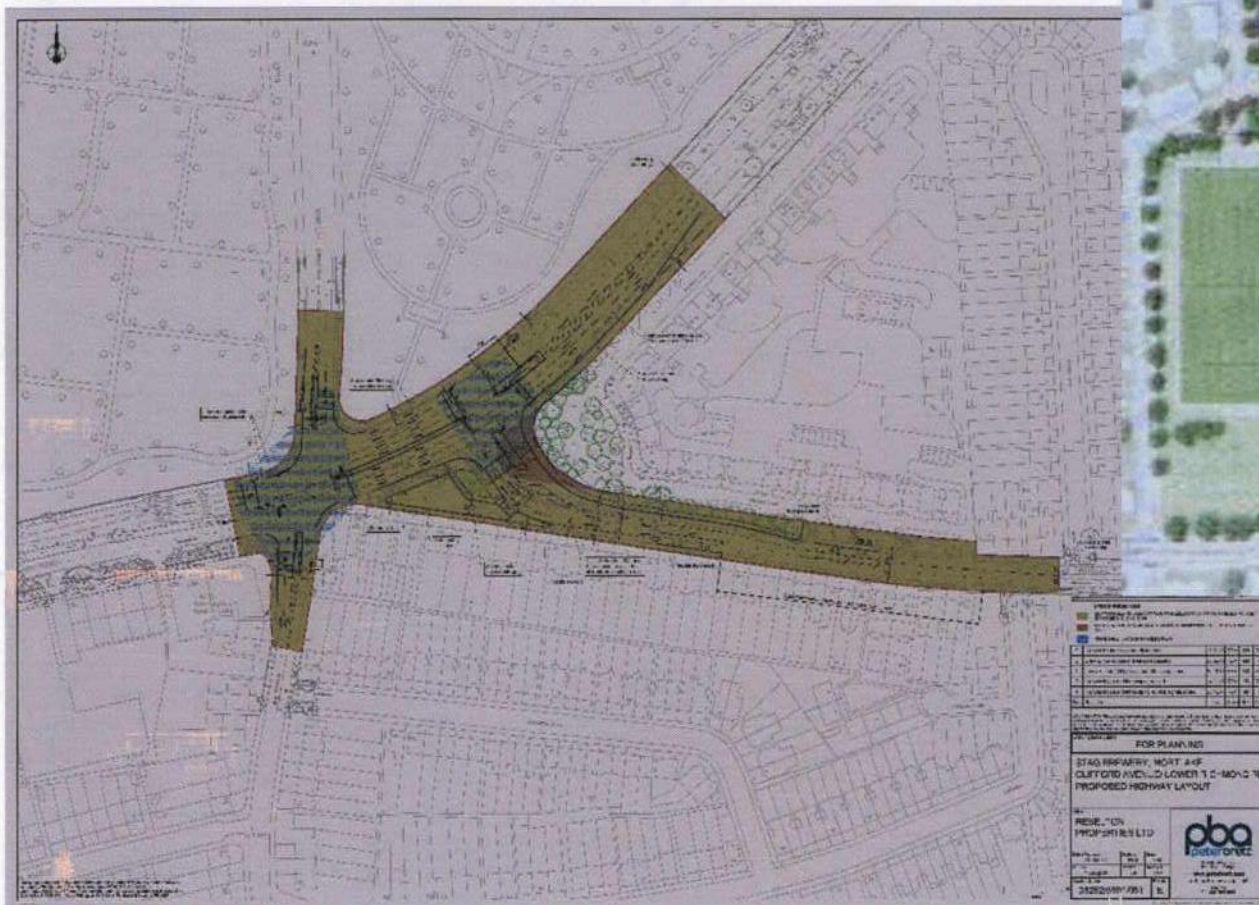


Basement carpark

- 408 spaces in east
- 256 spaces in west
- 30,000 m² approx.
- 60,000 m³ to be excavated
- 3,000 truck trips
- Estimated cost £77m

Chalkers Corner


#LOVE MORTLAKE



Chalkers Corner 350m west of site and partly within North Richmond ward. Reconfiguration involves moving junction closer to Chertsey Court in order to provide more stacking room for vehicles doing the dogleg into Mortlake Road to Kew. The proposal involves landtake from the garden of Chertsey Court which is an OOLTI.

Online responses not including MBCG and offline responses



		Mortlake	E Sheen	Barnes	Kew	Other	Groups	Total
Brewery	Objectors	167	179	100	17	17	8	488
	Observers	9	10	7	1	1		28
	Supporters	7	8	3	1	2		21
School	Objectors	63	48	29	4	5	8	157
	Observers	1	5	2				8
	Supporters	3	7	3	1		1	15
Chalkers Corner	Objectors	63	38	17	7	6	10	141
	Observers	2	1	3		1		7
	Supporters	1						1
Totals	Objectors	293	265	146	28	28	26	786
	Observers	12	16	12	1	2	0	43
	Supporters	11	15	6	2	2	1	37

Groups: MCA (3), MESS (3), BCA (3), Kew Soc (3), Richmond Cycling Campaign (2), Mums for Lungs (3), Queens School Kew (1), Richmond Green Party (3), Richmond Labour Party (1), Richmond FoE (1), and Richmond Bat Species Action Plan Steering Group (1).

MBCG's comments overview

- Cumulative density of the site is overwhelming
- Local infrastructure can not accommodate the increase in traffic
- No strategy for improving public transportation and importantly no plan to address issues of level crossing
- Loss of protected sports fields and inadequate protection of OOLTIs
- Level of affordable housing below targets set by Mayor and by Council
- No plan to address increased demand for NHS facilities
- Size of secondary school too large for plot
- Evidence of the need for a secondary school not proven



Agenda

- Mortlake Brewery Community Group – Background Kate Woodhouse
- The Planning Applications Tim Catchpole
- **Assessment of Development** **Peter Eaton**
- Assessment of Traffic Impact Howard Potter
- The Secondary School Geoff Woodhouse/
Geoff Stanton
- Conclusions Kate Woodhouse

Positive aspects

The design does bring a number of positives and in some areas is aligned to the community's objectives:

- Establish a village 'heart' in Mortlake
- Additional housing in Richmond
- A mixed and open residential/commercial development
- Additional permeability and a 'green' link from Mortlake Green to the Thame
- Provision for a community centre, rowing club and health facilities
- Retention of existing buildings

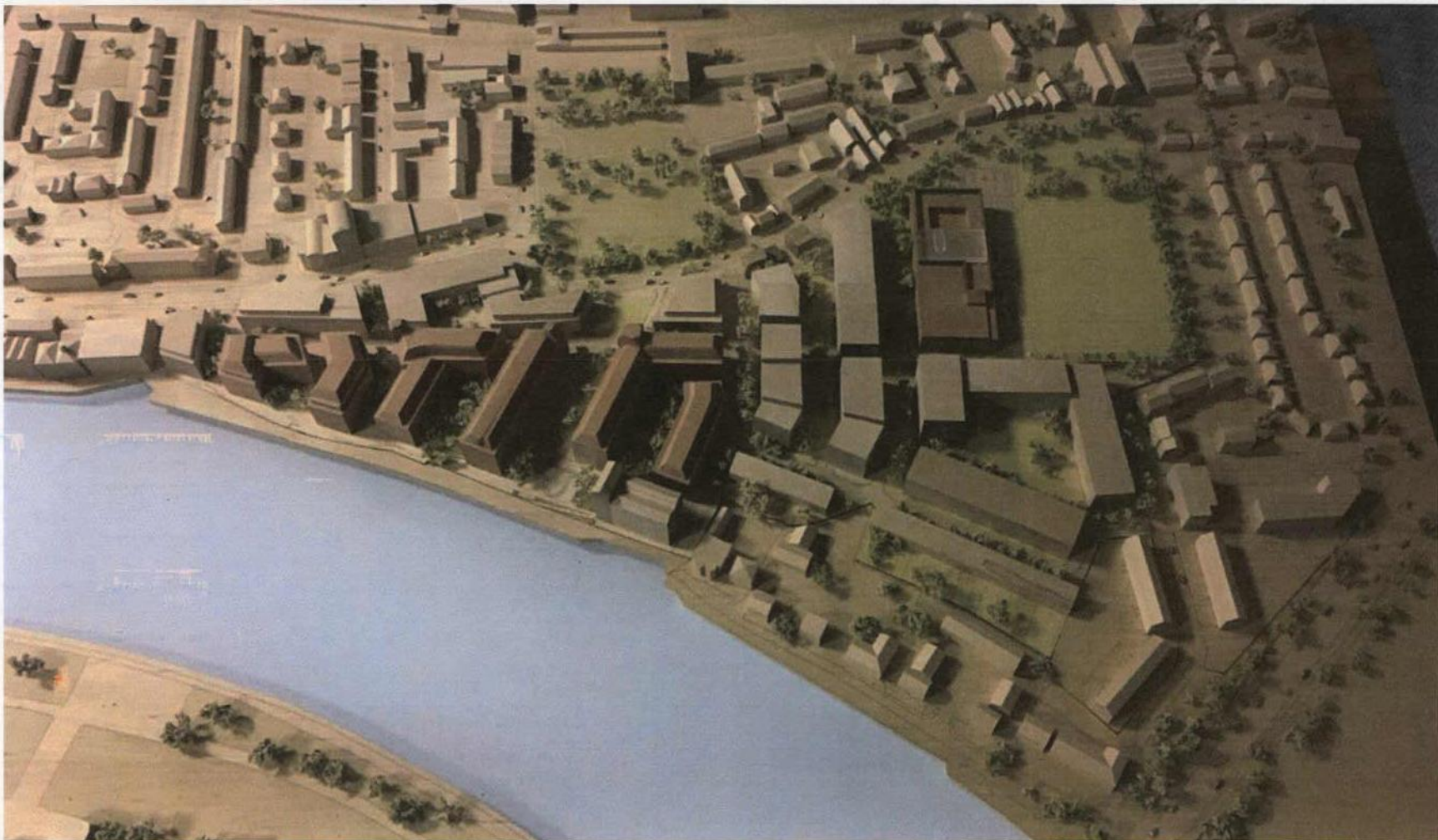
Design concerns

However, there are a number of areas of concern where there has been limited movement in the plans:

- Combined density of residential, commercial units and the school exceeds the planning brief and GLA guidelines
- Inadequate provision of affordable housing
- Playing fields are protected (OOLTI) and should not be built upon – indeed the two grass pitches, if upgraded can sustain as much use as a single all-weather pitch
- A 1,200 pupil school is too large for plot which, including sports pitch is 1.6ha as against which are both 3.5ha
- Heights of some buildings are in excess of the 2011 planning brief
- Green space below planning brief proposals (21% vs 28%)
- Overshadowing and overlooking in eastern part

Design concerns


#LOVE MORTLAKE



The developer's model clearly shows the very high density on the eastern side of the site and tight spacing between buildings.

Design concerns

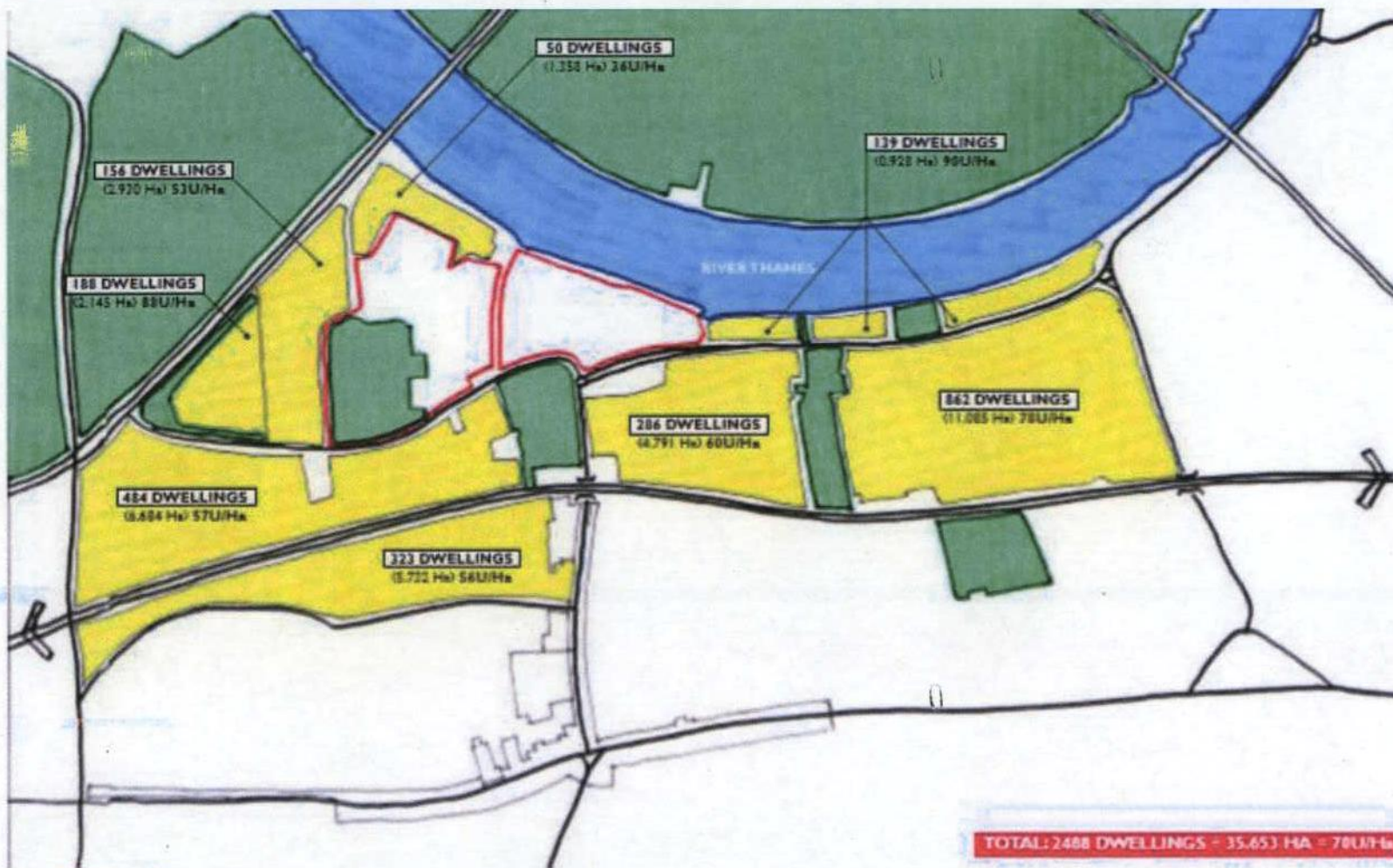

#LOVE♥MORTLAKE



This model shows the overshadowing and overlooking in the eastern part of the development.

Density (1)


#LOVE MORTLAKE

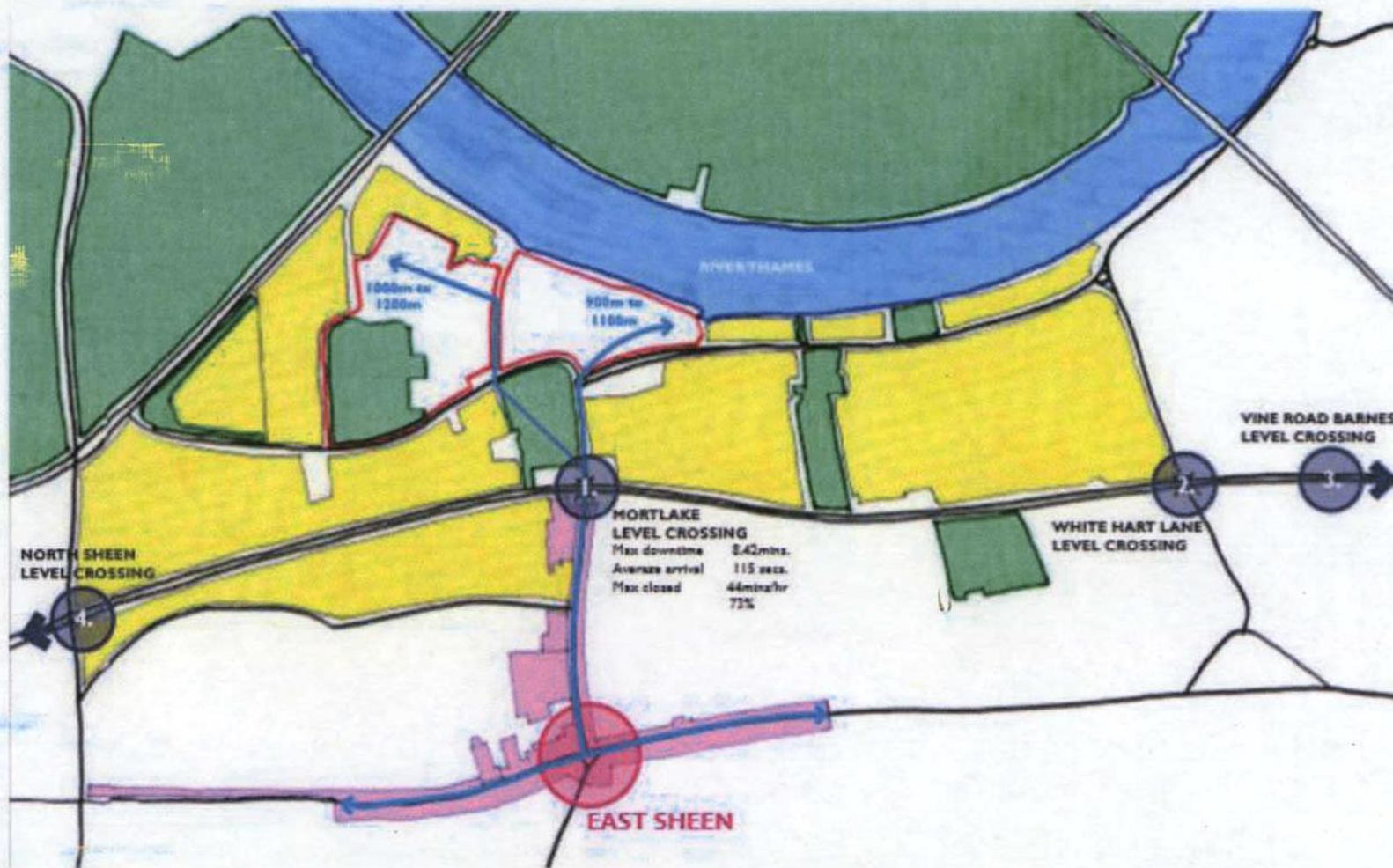


Proposed plans could increase numbers of

- habitable homes in Mortlake by 38%
- residents of Mortlake by 44%.

The proposed residential density on the eastern side is three times that of other Mortlake areas. Commercial use and the new school which will have around 1,200 pupils will add to peak traffic and transport use.

Density (2)



GLA guidelines favour higher density within 800m of railway stations and shopping centres. The site might be within 800m of the railway station but well over 800m from the focal point of the shopping centre and access is hindered by the level crossing barriers.

Commercial use and the new school with around 1,200 pupils will add to peak traffic and transport use.

Response to GLA's comments (1)



47. "17% affordable housing is unacceptable." Agreed and we insist there should be affordable housing in Phase 1.

44. "The basement parking proposed has a disproportionate impact on viability to deliver the fullest contribution towards affordable housing." Agreed.

62. "The residential density is approximately 139 units per ha.... within the appropriate range for PTAL 2." It is higher in east zone (with new open space corridor excluded), hence problems of overshadowing and overlooking.

33. "Proposals offer new sports facilities of potentially greater benefit to sport and local community than existing private grass pitches." Not true because (a) proposal is for only one pitch instead of two, (b) no mention of visual impact of fencing and floodlights and (c) existing pitches whilst private have always been extensively used by the community and can be upgraded.

Response to GLA's comments (2)



- 36.** “The Council should respond fully... to ensure that there is a robust and evidenced case for a secondary school as the size requirement has an impact on both the loss of playing fields and the traffic and transport impacts.” Agreed.
- 57.** “Inclusion of a vehicular access ramp within Building 10 creates a long dead frontage” in High Street. Agreed.
- 61.** “The height strategy responds to the parameters set within the Council’s planning brief.” Actually the heights exceed the brief in places.
- 63.** “A robust design code will be essential to secure aspects of both the residential and public realm quality of the scheme.” Welcomed.

Agenda

- Mortlake Brewery Community Group – Background Kate Woodhouse
- The Planning Applications Tim Catchpole
- Assessment of Development Peter Eaton
- **Assessment of Traffic Impact** **Howard Potter**
- The Secondary School Geoff Woodhouse/
Geoff Stanton
- Conclusions Kate Woodhouse

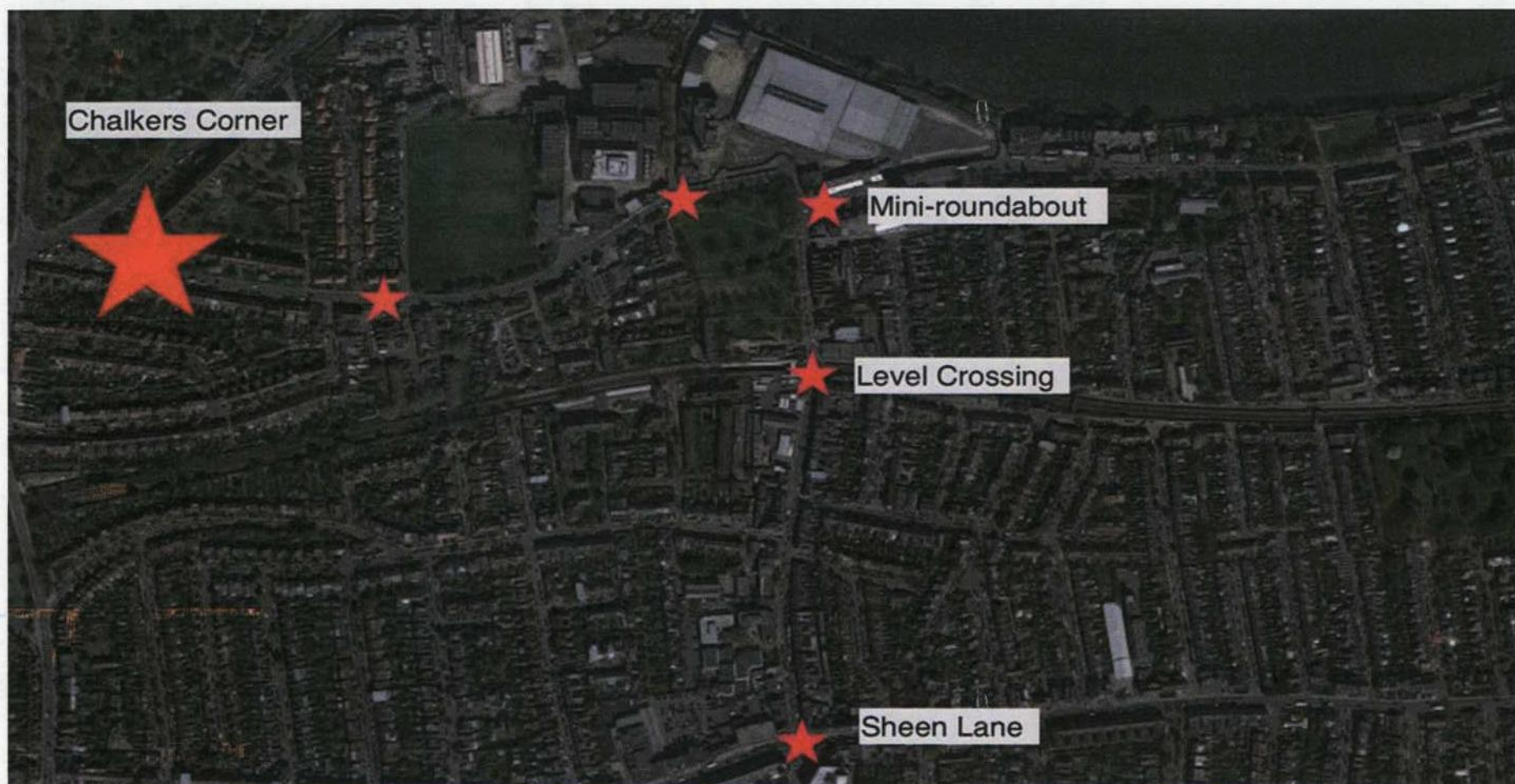
Transport concerns



- Traffic/transport solution needs Borough and TfL coordinated action
- Car parking concerns
- No major improvement to public transport, notably for school pupils
- Sheen Lane level crossing safety concern, notably for school pupils; increased use = increased risk
- Chalkers Corner road-widening not an effective solution, detrimental to Chertsey Court residents
- Increased traffic = increased air pollution



Infrastructure constraints

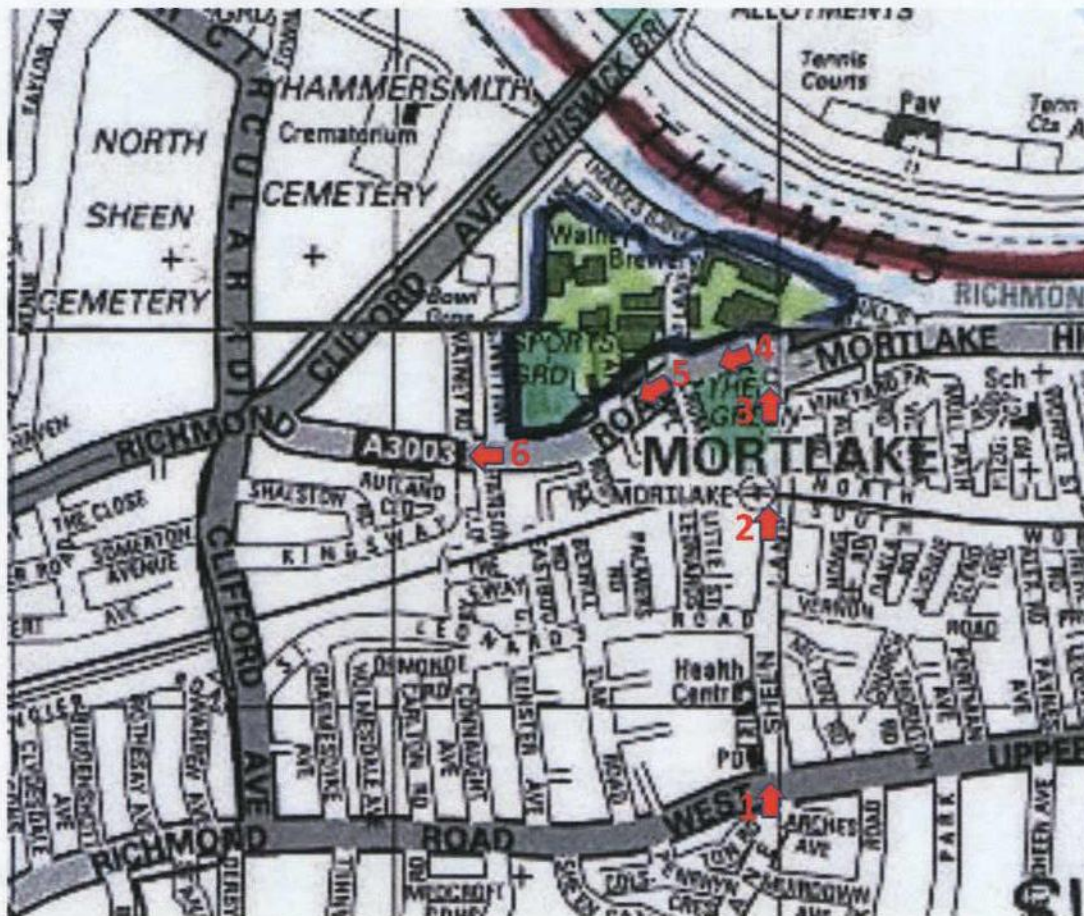


These are the traffic problem points that will be impacted by the development. This is not just an issue for the residents there but for Sheen, Mortlake and Barnes as the expanded junction draws North-South and East-West traffic through our neighbourhoods.

The gridlock


#LOVE MORTLAKE

Peak-hour traffic, Sheen Lane & Lower Richmond Road



Sheen Lane level crossing



- Fourth riskiest crossing on Wessex route. Network Rail has made its concerns about increased risk from the development clear in its own risk assessment report which is on our website
- A survey conducted by the MBCG also confirms the risks associated with higher usage numbers at the level crossing
- Current traffic and pedestrian volumes create delay, frustration and a serious accident risk – especially between vehicles and pedestrians/cyclists
- The size and scale of the proposed development would materially exacerbate this
- The local infrastructure cannot support the increased demand – the overall density needs to be significantly reduced

Chalkers Corner



This shows the proposed alterations to Chalkers Corner. The blue line is the existing kerb line. If these plans go ahead they will simply increase the amount of traffic attracted along Lower Mortlake Road, pulling traffic through Barnes

It will increase pollution and will mean the loss of several mature trees.

It will also be grim for the residents of Chertsey Court who will have traffic lanes even closer to their homes. It does not seem right that the residents should bear the brunt of the traffic impact from a development on the brewery site.

TfL's comments (1)

MBCG agrees that

- traffic modelling needs to be further analysed given critical expert scrutiny by MBCG. Without this, the case for the Chalkers Corner proposal is extremely vulnerable to challenge
- there is a need to further reduce the parking, in particular the non-residential parking
- extension of CPZs to Chalkers Corner should be considered
- identification of additional buses is required but disagrees with land reservation on playing fields for bus turn-around
- TA's statement re level crossing and footbridge at Mortlake Station being suspect and needing to be agreed with Council and Network Rail

TfL's comments (2)



- Agree with concern about dwell time at level crossing which appears to have been omitted from TA
- Agree with concern about lack of information in TA re vulnerable users at crossing including young children as well as elderly
- Why no reference to the higher existing and future demands at the crossing based on MBCG's surveys and assessments?
- Agree that TA needs to take into account SWR's proposed increase in the number of services and hence likely adverse effect on barrier downtime
- Agree that impact on adjacent level crossings should be assessed
- What progress has been made with the NR/TfL/LBRUT/Developer/MBCG joint group to progress an effective solution to the footbridge problem?

Network Rail's comments



- Agree with concern about dwell time at level crossing which appears to have been omitted from TA
- Agree with concern about lack of information in TA re vulnerable users at crossing including young children as well as elderly
- Agree that TA needs to take into account SWR's proposed increase in the number of services and hence likely adverse effect on barrier downtime
- NR seems more concerned with level crossing footways and needs also to address potential impact on footbridge

Air quality concerns

NO₂ annual mean (2016)

WHO/Euro target 40mgm³

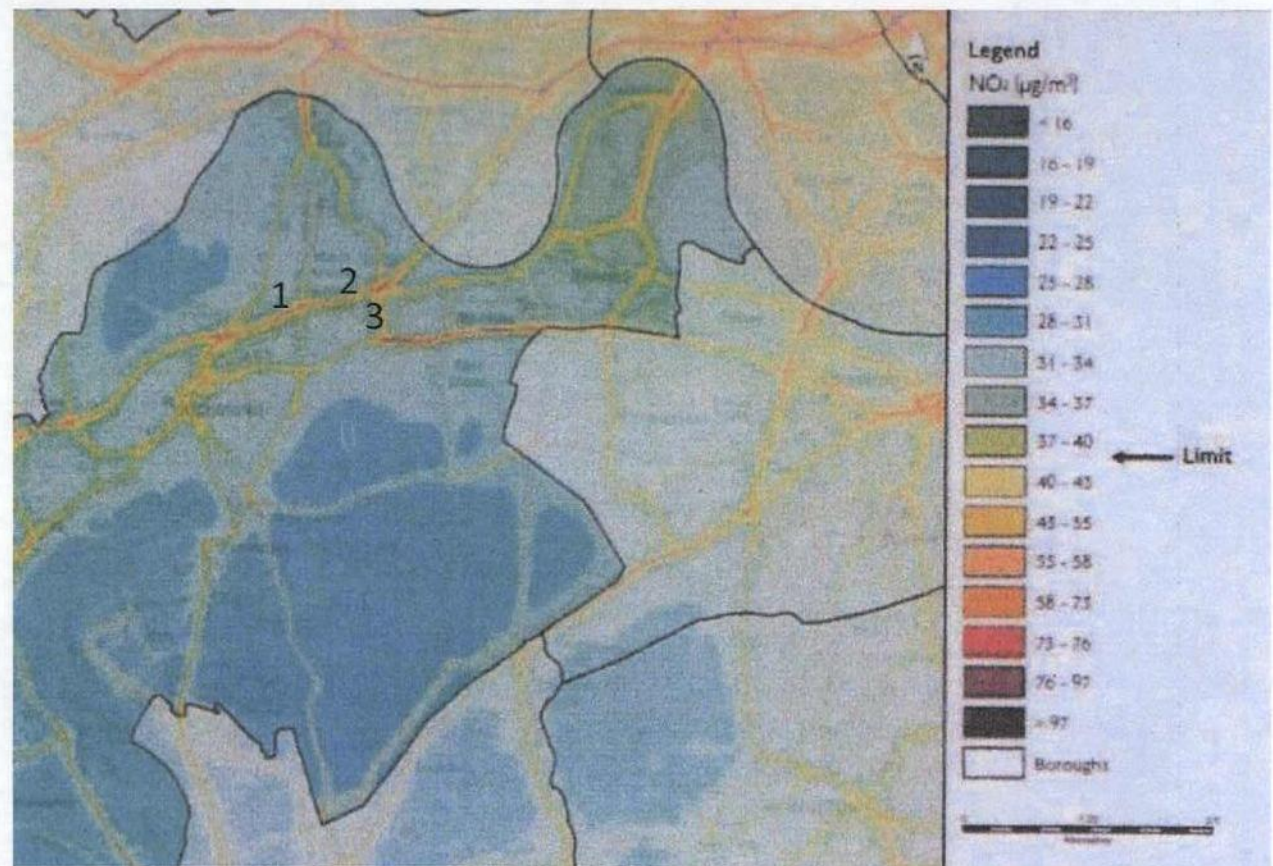
Council's readings:

1. Chalkers Corner	57
2. LRR/Kingsway	39
3. Sheen Lane X-ing	32

Developer's calculations:

LRR by Chertsey Ct	54
Chertsey Court	41
CC future	43
CC + development	44
CC + development + reconfiguration	44

If development with and without reconfiguration has the same mgm³, why reconfigure?





Agenda

- Mortlake Brewery Community Group – Background Kate Woodhouse
- The Planning Applications Tim Catchpole
- Assessment of Development Peter Eaton
- Assessment of Traffic Impact Howard Potter
- **The Secondary School** **Geoff Woodhouse/
Geoff Stanton**
- Conclusions Kate Woodhouse

A secondary school on the Stag Brewery site?

Main points

- The GLA has asked for a robust and evidenced case
- There is no published evidence for the need for a new secondary school on the Stag Brewery site
- We predict that approximately 90 additional places will be needed in the NE by 2023
- Overprovision of secondary places will damage RPA and Christ's School
- Christ's and RPA need to expand by about 90 places for viable sixth forms
- Expand these schools and they will provide the additional places needed

Public predictions by AfC in 2018 (1)

School Place Planning Strategy (February 2018), p19:

Effectively, then, there would be 400–550 local children competing for 205 local places – the 75 ‘Open’ places at Christ’s and the remaining 130 places at Richmond Park Academy – so the Council would be unable to meet its statutory duty to provide places for those children unless a new school were provided.

[no date given: this prediction was for 2019 onwards]

Response by the Cabinet Member to a public question, Council Meeting, 3 July 2018:

The latest pupil forecasts indicate that by 2020 there will be a need for five additional forms of entry in the area rising to six by 2021. ... it is considered essential that a new school is found for the eastern part of the borough.

Year 6 leavers from local primary schools

Source: SPPS (2018), p18:

	2015	2016	2017	2018	2019	2020	2021	2022	2023
Barnes	58	55	60	60	60	90	60	60	60
Darell	24	24	43	43	60	60	60	60	60
East Sheen	57	60	60	60	90	60	90	90	90
Holy Trinity	51	59	60	90	60	60	60	60	60
Kew Riverside	28	26	30	30	30	30	30	30	30
Lowther	47	43	60	60	60	60	60	60	60
Marshgate	54	88	90	60	60	90	60	60	90
Sheen Mount	54	55	60	60	90	60	90	90	90
Thomson House						48	52	52	52
Total	373	410	463	463	510	558	562	592	622

Public predictions by AfC in 2018 (2)

School Place Planning Strategy (February 2018), p19:

Effectively, then, there would be 400–550 local children [in 2019] competing for 205 local places – the 75 ‘Open’ places at Christ’s and the remaining 130 places at Richmond Park Academy – so the Council would be unable to meet its statutory duty to provide places for those children unless a new school were provided.

	2015	2016	2017		2019
Year 6 leavers	373	410	463		510
Demand	292	321	363		400
Places available	220	220	220		220
Predicted shortfall	72	101	143		180
Actual shortfall	0	0	0		

in 2019.
 510 leavers from 9 nurseries
 primary schools
 supply 71.4% / cat
 up

Review
 2019

Notes

- The 205 places have been increased to 220 (error in SPPS)
- Demand of 400 is about 80% of 510
- This take-up rate, applied to years 2015 to 2017, yields shortfalls of 72, 101, 143
- There was no shortfall in those years
- Therefore, the assumed take-up rate is too high
- We have detected a true take-up rate of about 50%

Public predictions by AfC in 2018 (3)

Council meeting 3 July 2018:

The latest pupil forecasts indicate that by 2020 there will be a need for five additional forms of entry in the area [**150** shortfall by 2020] rising to six [**180** shortfall] by 2021. ... it is considered essential that a new school is found for the eastern part of the borough.

(150 pupils)
1602021

- This moves the shortfall forward two years
- It still implies a shortfall of at least 90 in 2017

Characteristics of AfC predictions

- Predictions are routinely made with no supporting justification
- None of the predictions fits the actual outcomes for 2015, 2016 or 2017
- The predictions appear to be gross over-estimates
- We have asked AfC for an explanation and had no satisfactory reply
- We do not know how the predictions are arrived at

Recent trends

	2015	2016	2017	2018
Year-6 leavers	373	408	463	463
Intake, RPA and Christ's	159	184	176	180
Take-up, RPA and Christ's	43%	45%	38%	39%
Intake, Grey Court		27	40	c.30
Take-up, 3 schools		52%	47%	45%
Adjusted (schools 93% full)		52%	50%	49%

Notes

- Take-ups of 38% (2017) and 39% (2018) are based on capacities, not actual leavers (see next slide, which is from SPPS 2018 with corrections in bold)
- In 2017 and 2018, leaver classes were on average 93% full in the east
- Correction for this leads to total take-up, including Grey Court, as on bottom row
- This take-up of about 50% matches the total take-up from primary to secondary across the whole of the east of the borough
- We do not know where the other half of the primary leavers go
- We hope AfC will do some research

Year 6 leavers from local primary schools

SPPS (2018), p18, corrected

	2015	2016	2017	2018	2019	2020	2021	2022	2023
Barnes	58	55	60	60	60	90	60	60	60
Darell	24	24	43	43	60	60	60	60	60
East Sheen	57	60	60	60	90	60	90	90	90
Holy Trinity	51	59	60	90	60	60	60	60	60
Kew Riverside	28	26	30	30	30	30	30	30	30
Lowther	47	43	60	60	60	60	60	60	60
Marshgate	54	88	90	60	60	90	60	60	60
Sheen Mount	54	55	60	60	90	60	90	90	90
Thomson House						48	52	52	52
Total	373	410	463	463	510	558	562	562	562
	-- Actuals --		----- Capacities -----						

Space and shortfall in the north-east based on historical take-up rates

	2019	2020	2021	2022	2023
40% take-up rate	11	-8	-10	-10	-10
45%	-15	-36	-38	-38	-38
50%	-40	-64	-66	-66	-66
55%	-66	-92	-94	-94	-94

Notes

- These take-up rates are based once more on capacities, and exclude Grey Court
- Current take-up into RPA and Christ's on this basis is less than 40%
- If this increases to 50% (equivalent to a true total take-up rate, including Grey Court, of about 57%), the predicted shortfall is 66
- If it increases to 55% (equivalent to a true total take-up rate of about 62%), the predicted shortfall is 94
- These estimates ignore the planned increase in Christ's School's 'Open' places from 75 to 100 from 2019, which will increase their in-borough intake
- Thus, there is some 'headroom' in our estimate of need for an additional 90 places in the north-east

Supplementary note

Two points were raised during the presentation, relating to total secondary intake in the east, or Richmond, side of the borough.

1. How full are the secondary schools?

The following table shows the intakes for the years 2015 to 2018, compared to PAN:

School	PAN	2015	2016	2017	2018
RPA	180	168	166	138*	192 (210 offered)
Christ's	150	143	148	150	150
Grey Court	240	218†	240	240	240 (estimated)

† PAN was 210 in 2015 * Reduced offer made

2. Does not Grey Court's increased in-borough and reduced out-borough intake show an increased in-borough demand?

Grey Court's increased in-borough intake is from Grey Court's catchment area. A new secondary school in Mortlake is not intended to meet this demand.

Summary

- Only about 50% of primary school leavers in the east of the borough go on to state secondary schools in the east
- We do not know where the other children go, but the primary schools presumably do
- AfC predictions are not explained but are based on much higher take-up rates
- AfC predictions do not fit recent outcomes
- Based on recent outcomes, at most 90 new secondary places will be needed in the NE by 2023

What we would like to see

AfC

- to place clear evidence of need in the public domain when predictions of such importance as this are made
- to correct and re-analyse the primary school data using historically based take-up rates
- to research the destinations of all the children in those schools
- to consult with neighbouring boroughs
- to consult with RPA and Christ's about expansion

The new Council to scrutinise AfC predictions

Sixth forms: the Government's position

*'We will only approve a secondary school with a sixth form where **the proposed sixth form will provide places for a minimum of 200 students.** Even if your free school application is approved, we may still ask you to consider expanding the proposed size of your school or sixth form to ensure that we get the maximum value from the investment of capital funding, and to improve **the educational and financial sustainability of your school.**' [Our emphases]*

Source: *How to apply to set up a mainstream free school*, Para 9.8
(Department for Education, updated July 2018)

Our comments on rationale for the size specification



- A proportion of 16 year olds will always move on from their school, for instance in order to follow college programmes, apprenticeships, take subjects / combinations that their school cannot provide, or because they do not qualify for A level entry.
- Unless their school offers an adequate choice of A levels, a higher proportion than usual will leave for another provider.
- If this happens, the sixth form gets smaller and choice is further reduced.
- This results in a downward spiral, and reduced financial and educational viability.
- The DfE regards adequacy as requiring a minimum choice of 15 subjects (*ibid. paragraph 9.5*)
- This implies a sixth form of 200+, and an overall school size of 1,200+.

What are the local sixth form figures at present?

School size, sixth form %, and % uptake within school

School	Overall	Sixth Form	% Total	% Take-up
RPA	771	67	9%	24%
Christ's	801	93	12%	33%
Orleans Park	1211	201	17%	50%
Chiswick	1277	200	16%	46%
Grey Court	1342	235	18%	53%

What has been the response of AfC?

AfC do not accept the DfE position, saying instead that each school can define what they regard as viability, because they argue that:

- schools can choose to transfer funds from the lower school

But we say *that this penalises students who do not move into the sixth form*

- staff are easier to recruit if there is sixth form teaching

But we point out *that if few subjects are on offer then few staff will get this chance.*

Overall, AfC focuses on ameliorating the financial problems and ignores

- the downward spiral effect
- the effect of unduly small classes on **educational** viability and experience
- the risks inherent in over-provision for **all the schools** involved.

Summary

Given the significance of its forecasts of the demand for secondary places on

- the planning of the brewery site
- the 'educational ecology' of the area
- questions about the need for an additional school at all

AfC needs to produce a **more transparent and consistent forecasting model** involving **consultation** with both local schools and neighbouring authorities

As the GLA puts it, there needs to be a 'robust and evidenced case for a secondary school' on the brewery site. If there is such a case, it is not in the public domain, not even in the proposal for the Livingstone Academy, which only refers to the situation in Tower Hamlets.

On the basis of our current knowledge, and the need to maintain a minimum size for sixth forms, we argue that the best way forward would be to **expand the existing schools** (in their less confined locations) rather than creating a new and large school on a confined site with problematic transport links.



A primary school?

And finally, our supplementary report on the need for the secondary school submitted on 8 June made the following recommendation:

'Meanwhile, there is a demonstrable requirement for an existing primary school, Thomson House, to be re-sited. The advent of the Stag Brewery site development is an unrepeatable opportunity to do this.'

Thomson House School has emerged since publication of the Planning Brief in 2011. It is accommodated on two sites - in Vernon Hall on the south side of the Sheen Lane level crossing and on a site immediately to the north of the crossing. The latter site is in a high risk location. In the morning parents with children and buggies have to negotiate the crossing or footbridge when the barriers are down for 45 minutes in the peak hour, and in the afternoon they have to negotiate it again when there is less traffic and motorists have a tendency to accelerate before reaching the crossing.

This school should be relocated to the Brewery site as indicated in the Planning Brief of 2011.

Sheen Lane level crossing


#LOVE MORTLAKE



The barriers are down. Parents walking to and from Thomson House School (the white building on the right) cross Sheen Lane with their children and buggies to negotiate the footbridge on the left.



The barriers are up. Parents walking to and from Thomson House School use a narrow footway to cross the railway. Is this the best location for a **primary school**? A **secondary school** would make the level crossing even more dangerous.

Conclusions



Mortlake Brewery Community Group is concerned about

- density and sustainability of the housing
- lack of affordable and social housing
- impact of additional traffic on the immediate and wider area
- safety at the level crossing
- loss of land at Chertsey Court
- air quality
- evidence of the need for a secondary school

There are other equally important issues that we have not addressed this morning including

- need for a community centre
- healthcare provision



Further Comments on the Stag Brewery Planning Applications

Application covered by these comments:

Application B – Ref. 18/0548

The erection of a three storey building to provide a new secondary school with sixth form; sports pitch with floodlighting, external multi-use games area and play space; and associated external works including landscaping, car and cycle parking, and new access routes.

Prepared by Mortlake Brewery Community Group and Academy Advisory

8 June 2018

Executive Summary

- 1. Including a large secondary school on the Stag Brewery site produces fundamental difficulties for the planning of the whole site, and generates unresolved (and insurmountable?) transport problems.**
- 2. However, and remarkably, the case for such a school has not been made, and our analysis indicates that it cannot be made.**
- 3. The argument for the secondary school was based on incorrect figures of likely demand within this part of Richmond, and omits many other relevant factors such as the position in neighbouring boroughs and the role of local and prestigious independent schools.**
- 4. We estimate the unmet demand in the medium term to be about 90 places. This can be met by expansion of the two existing secondary schools in this part of the borough, which are on less confined sites and are likely to welcome such expansion since it would make their sixth forms more viable.**
- 5. Meanwhile, there is a demonstrable requirement for an existing primary school, Thomson House, to be re-sited. The advent of the Stag Brewery site development is an unrepeatable opportunity to do this.**

Contents

1. Introduction.....	4
1.1 Key Contributors.....	8
2. Prediction of demand for secondary places	9
2.1 Prediction of borough-wide secondary shortfall	9
2.2 Prediction of demand for local secondary places.....	10
2.3 A better prediction of local secondary shortfall	12
2.3.1 A simple prediction of need.....	12
2.3.2 Using historically based take-up rates to predict future need	13
3. Next steps	16
4. Towards a better school place planning strategy	18
4.1 Prediction of borough-wide secondary shortfall	18
4.2 Prediction of secondary demand from the 9 schools	20
4.3 Other improvements to SPPS	23
5. Conclusion and Recommendations.....	26
Figures	
Appendix A	

1. Introduction

The Mortlake Brewery Community Group's (MBCG) **Response and Objections Raised Against the Stag Brewery Planning Applications** (Chapter 7: School) includes a section on the need for the secondary school and expresses concern about the lack of detail provided in the Council's **School Place Planning Strategy** of 2015. This document influenced the London Borough of Richmond upon Thames's (LBRuT) Council Cabinet decision in October 2015 to change the education requirement for the Brewery site from a primary school, as shown in the Planning Brief for the site of 2011, to a secondary school.

The SPPS has recently been updated (February 2018). We note that the Planning Application for the secondary school is supported by the **Design and Access Statement Volume 4 (DAS4): Secondary School Design**, which presents details of the design but does not include any justification for either the existence or the size of the school, that is, 6 form entry (6FE) plus sixth form, as it was clearly not within the applicant's brief to do so. We are of the view that the borough's **School Place Planning Strategy (February 2018) (SPPS)** should have been tabled as a supporting document, and these comments relate to it, not to DAS4.

The provision of this school became part of the Borough's **Local Plan (SA24)** which underwent a Public Examination hearing in September/October 2017. MBCG challenged the size of the school at this hearing on the grounds of unsound evidence. Following publication of the SPPS (February 2018), MBCG engaged an education consultancy, Academy Advisory, to review the evidence on which the decision to provide a new secondary school was based.

The present report, which was promised in Chapter 7 of MBCG's Response and Objections (para 11.7), has been prepared by MBCG with input from Academy Advisory, whose full paper is included as Appendix A. The report finds that the evidence presented in the SPPS in support of the need for a 6FE secondary school is indeed unsound: the true need for additional secondary places in the neighbourhood by 2023 (the period with which SPPS is concerned) is approximately 90.

Accordingly, the need for a new 6FE secondary school disappears and, with it, numerous difficulties for the planning of the whole site. Serious traffic congestion predicted to be generated in peak hours by students and staff approaching and leaving such a large school need not happen; the OOLTI protected green space can be preserved in line with the analysis in the Stag Brewery Planning Brief (2011), paragraphs 2.6 and 5.38; and the Land Use principle in paragraph 5.20, supporting the provision of a 2FE primary school on the site, can be complied with.

This report serves three purposes and is, therefore, addressed to three different but overlapping audiences.

1. It is an addendum to MBCG's **Response and Objections Raised Against the Stag Brewery Planning Applications**. As such, it is addressed to Planning Departments in both LBRuT and the Greater London Authority.
2. It is a response to LBRuT's **School Place Planning Strategy (February 2018) (SPPS)**, an educational planning document. As such, it is addressed to LBRuT Councillors in general and, in particular, to those Councillors with a responsibility for Education.
3. It provides recommendations for detailed, systematic improvement of the **School Place Planning Strategy**. As such, it is addressed to LBRuT Officers responsible for the drafting of that document.

Planners will need to understand that the sole justification for building a new 6FE secondary school on the Stag Brewery site is the set of predictions of future secondary demand in the neighbourhood of Mortlake presented in SPPS (Secondary Phase, pp16–19). They will need to read the commentary in Section 2 of this report hereby submitted, which establishes point 4 of the Executive Summary. We demonstrate, we believe convincingly, that the predictions made in SPPS of secondary need in this part of the borough are not credible and that the 90 places mentioned in point 4 are a realistic estimate of the true additional secondary need up to 2023. If our own prediction is verified, the justification for building a new 6FE secondary school falls and that part of the Planning Application that relates to this school must be rejected.

Once our findings have been verified by Councillors and Officers, that is formally the end of the matter as far as Planning Application B is concerned. Planners will, however, appreciate that the community of Mortlake has a legitimate concern for the provision of education both on the Stag Brewery site, as part of its infrastructure, and in the wider environs. Planners, therefore, may be interested to read Section 3, which shows that the extra demand we predict could be provided by expanding Richmond Park Academy (RPA) and Christ's School, two secondary schools within a mile of the Stag Brewery site. These schools in fact require to be expanded by approximately 3FE between them in order to make their sixth forms viable, which they are not at the moment.

We have already demonstrated, in our Response and Objections Raised, that the present siting of Thomson House school on either side of the dangerous level crossing in Sheen Lane presents an unacceptable safety hazard. The expansion just mentioned of RPA and Christ's allows Thomson House to be re-sited in a suitable position on the Stag Brewery site.

Such an amendment to Planning Application B would not only alleviate a safety hazard already identified by local residents and by National Rail but also comply with a key principle on land use laid down in the Stag Brewery Planning Brief (2011), paragraphs 5.19 and 5.20, supporting the provision of a 2FE primary school on the site.

Councillors in general will be aware that the stated need for a 6FE secondary school on the site is based upon the justification presented in the SPPS (February 2018). They will need to be convinced that our arguments in Section 2 against that justification are at least substantial. For this, they should read the introduction to Section 2 and then the arithmetical argument in Section 2.3.1, entitled *A simple prediction of need*. This is based on the actual uptake of secondary places in 2017 in RPA, and the same estimates for the uptake in Christ's School as SPPS uses. Our argument shows very simply that true additional need by 2023, based on the SPPS estimates of Year 6 cohorts up to 2023, is approximately 90 places. Any claim, therefore, of a need for 180 or more extra places, which alone would justify a new 6FE secondary school, will have to be based upon a convincing argument. Such an argument does not exist.

Councillors will appreciate that 90 extra places, or 3 FE, can be provided much more economically by expanding RPA and Christ's. They should go on to read Section 3, already recommended to planners to read, where it is shown that RPA and Christ's currently have non-viable sixth forms. These schools need to expand by 3FE altogether in order for their sixth forms to become viable. Those 3FE would be filled by the extra demand from local primary school children forecast for 2023 in Section 2 of this report. This happy coincidence shows that the obvious way to provide for that extra demand is to expand RPA and Christ's appropriately. To build instead a new secondary school with sixth form would risk creating non-viable sixth forms in all three schools.

Councillors with responsibility for Education will want to check carefully our arguments in Section 2. They will find, by reading Sections 2.1 and 2.2 that not only are the predictions of demand in the immediate neighbourhood ludicrously high but also the predictions of shortfall across the borough as a whole are suspect. By continuing to read Section 2.3 in full, they will find how we derive our estimate of 90 places more formally than by the simple arithmetical argument in Section 2.3.1. In fact we use exactly the same model as SPPS does, complete with its inflated data on Year 6 cohorts, but with a take-up rate based on actual take-up in recent years at RPA. (The model assumes a fixed take-up at Christ's.) We show how to derive a historically based range of take-up rates and these are all much lower than the one that SPPS has used.

This adjustment by itself brings the estimated demand in future years tumbling down. Councillors, with their Officers, will be able to verify for themselves that the take-up rates for the pupils with which they are concerned are much lower than the ones that SPPS has assumed. If, in addition, they derive more realistic sizes for the Year 6 cohorts in the schools than the raw capacities that SPPS uses, they will find the predicted extra demand is even lower than in our estimates.

This exercise should convince Councillors and Officers that the current SPPS is not fit for purpose. In Section 4, we make detailed recommendations for improvement of this document, so that it may become a true strategic plan for the provision of school places not only in the neighbourhood of Mortlake but also across the borough as a whole.

Before reading Section 4 these Councillors and their Officers should read also Section 3, which makes a strong argument for central government to make available the necessary funds for the permanent expansion of RPA and Christ's.

All readers should read Section 5. This section draws conclusions and makes recommendations, notably that the Council should

- abandon its plan to build a new secondary school on the Stag Brewery site and revert to the Planning Brief principle in support of the provision of a 2FE primary school, and
- ensure that any future decisions regarding the development or expansion of schools are taken with full and proper consultation with all interested parties.

The report also includes two figures showing

- the secondary schools in the borough and environs and
- the state primary schools that feed the secondary schools near the Brewery site.

Appendix A is the report of Academy Advisory which has provided input into the main report.

1.1 Key Contributors

A short summary of the key contributors and their experience is outlined below:

Name	Experience
Geoff Woodhouse MA MSc PhD	Geoff began his association with education in Richmond as a mathematics teacher at Shene School, the precursor to Richmond Park Academy. He was seconded to LBRuT as a statistician at the start of 'Local Management of Schools'. He went on to the Institute of Education, London, where he lectured in statistics and contributed to the then lively national debate on 'School Effectiveness'. He found that LEA league tables (as they were then) were unstable, and depended critically on the model used to predict schools' outcomes from their intakes. Finally, Geoff returned to education in Richmond as a mathematics lecturer in the Richmond upon Thames College.
Geoff Stanton BA FCGI	Geoff is a Visiting Fellow at the UCL Institute of Education, and an independent consultant. He has a special interest in 16-19 education and training. He was for four years Vice Principal of Richmond-upon-Thames Tertiary College, and for eight years CEO of the Further Education Unit, a government-funded quango with a brief to review and develop FE curricula in England and Wales.
Chris Whiting FCCA	Chris is a Certified Chartered Accountant who has specialised in the education sector over the past 15 years, working as a finance director within multi-academy trusts and as an advisor to the sector. Chris formed Academy Advisory in 2014 to provide a range of services to the academy sector including: audit, assurance, consultancy, finance support and finance director services. Chris is responsible for over 70 academy audits in addition to being finance director of two multi-academy trusts and advisor to a broad range of single and multi-academy trusts.
Tim Catchpole MA DipUD FRTPI	Tim has had a 40-year career in urban planning and environmental impact assessment (EIA). His first 15 years were spent here in London and included 11 years at the Greater London Council. His next 25 years were spent in the urban planning team of a major UK engineering consultancy, with whom he has led major development projects mainly in the Middle East. After retiring as director of this team he has been free-lance planning consultant on major development projects in South Africa and Uganda.

2. Prediction of demand for secondary places

The Council's justification for building a new 6FE secondary school on the Stag Brewery site rests upon two predictions made in their SPPS,

1. of future borough-wide secondary shortfall (p16),
2. of future demand for secondary places by children in 9 primary schools in the neighbourhood of Mortlake (pp18 & 19). We shall call these schools 'the 9 schools'.

This section demonstrates that both of these predictions are clear overestimates, and that the most likely requirement for extra places by 2023 for children in the 9 schools amounts to 3 extra FE.

2.1 Prediction of borough-wide secondary shortfall

The relevant passage is on p16 of SPPS:

In September 2017, seven of the 11 schools were at capacity in Year 7; the other four between them had 180 spare places. Once Turing House becomes established on its proposed permanent site, which is expected to happen in 2020, the three new schools in the borough will, between them, have added 450 extra Year 7 places since 2013. At present, those three schools have provided enough places for the western half of the borough for the remainder of this decade. Beyond that point, it is expected that capacity difficulties will first be cushioned by fewer out-borough children being able to access places in the eight schools west of the Thames.

The table below shows the actual (for 2017) and anticipated (from 2018 onwards) surpluses and shortfalls of places in the western and eastern halves of the borough, and then by the borough as a whole:

Year	2017		2018		2019		2020		2021		2022		2023	
	PAN	NoR	PAN	NoR	PAN	NoR	PAN	NoR	PAN	NoR	PAN	NoR	PAN	NoR
Western half	1432	1302	1457	1392	1432	1432	1482	1482	1482	1482	1482	1482	1482	1482
Eastern half	570	550	570	540	570	570	570	570	570	570	570	570	570	570
Total	2002	1852	2027	1932	2002	2002	2052	2052	2052	2052	2052	2052	2052	2052
Year 6 cohort	2067		2169		2343		2428		2556		2550		2542	
88% retention			1932		2062		2137		2249		2244		2237	
Space/shortfall	150		70		-60		-82		-197		-192		-185	

PAN = published admission number; NoR = number on roll. General take-up rate from Year 6 assumed at 88%. Conversion rates from Reception to Year 6 average at 100%, so Year 6 totals from 2016 entry derive from the relevant year-groups in the October 2016 census.

As can be seen, the availability of places between the two halves of the borough is unbalanced. Traditionally, the drop-off to the private sector in the eastern half has been much higher than in the western half and that remains the case. ...

Comment:

Although the table itself does not, as SPPS claims, show surpluses and shortfalls of places in the western and eastern halves of the borough, it is clear from this passage that after the end of this decade shortfall in secondary places is assumed to occur only in the east. SPPS

admits that drop-off to the private sector continues to be much higher in the east than in the west. Yet, strangely, the note to the table shows that a general take-up rate of 88%, assumed to be appropriate for the borough as a whole, has been used to predict a shortfall of 185 in 2023, occurring only in the east.

It is not clear, in fact, how the 88% take-up figure has been derived, but a much lower take-up rate should have been used to predict any shortfall in the east, as we confirm in Section 2.2. It follows that the estimated shortfall of 185 in the east is much too high.

2.2 Prediction of demand for local secondary places

This second prediction is based on the second table on p18 and a set of assumptions listed on p19. The relevant passage follows:

... 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:

	2015	2016	2017	2018	2019	2020	2021	2022	2023
Barnes	58	55	60	60	60	90	60	60	60
Darell	24	24	43	43	60	60	60	60	60
East Sheen	57	60	60	60	90	60	90	90	90
Holy Trinity	51	59	60	90	60	60	60	60	60
Kew Riverside	28	26	30	30	30	30	30	30	30
Lowther	47	43	60	60	60	60	60	60	60
Marshgate	54	88	90	60	60	90	60	60	90
Sheen Mount	54	55	60	60	90	60	90	90	90
Thomson House						48	52	52	52
Total	373	410	463	463	510	558	562	592	622

Actual (in 2015 and 2016) and maximum possible (from 2017–2023) numbers of Year 6 leavers at the nine non-Catholic primary schools within Richmond Park Academy's vicinity

In the last two years, there were a significant number of children in the eastern half of the borough, mostly in Barnes and Kew, for whom offers couldn't be made at any of the three local schools in March, at the initial allocations stage. In March 2017, 85 children from the eastern half of the borough have either been offered secondary school places in the western half of the borough or haven't yet been offered places at any school. Whilst we are confident, based on previous years' experience, that in the next few months those children will be offered places from the waiting-lists at schools closer to home, we know that in future years the numbers of children due to transfer from primary to secondary school will substantially increase to the point where the capacity in the three schools in the eastern half of the borough will be nowhere near enough to meet the need for places in September.

That assessment takes note of the following assumptions, that in any given year:

- 10–15 Holy Trinity leavers would be likely to obtain 'Foundation' places at Christ's;
- due to their proximity to the school, c. 50 Wandsworth Borough children would always be likely to obtain places at Richmond Park Academy (in 2016, 74 out-borough children were offered places at Richmond Park Academy, and the closest Wandsworth secondary school, Ark Putney, has become more popular and is forecast to become oversubscribed in the next few years, which will make it harder for children living on the Lennox Estate to obtain places there);
- the increasing numbers of secondary school places in Hounslow Borough will be filled by increased demand from children attending Hounslow primary schools;
- there will always be a certain percentage of the increased numbers of children entering private sector schools at Year 7;
- Whilst parents could also apply for places at Grey Court, they would be competing with parents of children living much nearer – in Ham, Richmond and North Kingston – and they would be highly unlikely to be successful. It should also be noted that two Richmond Borough primary schools near Grey Court – The Vineyard and The Russell – have been, respectively, fully and partially expanded recently, and all the non-faith primary schools in the North Kingston area of Kingston Borough have been permanently expanded since 2011. (However, the opening of The Kingston Academy in North Kingston in 2015 has offset some of that growth in numbers feeding through from the primary phase.)

Effectively, then, there would be 400–550 local children competing for 205 local places – the 75 'Open' places at Christ's and the remaining 130 places at Richmond Park Academy – so the Council would be unable to meet its statutory duty to provide places for those children unless a new school were provided.

Comment:

The number 205 of local places ignores the first assumption about Holy Trinity leavers, so let us allow that there are assumed to be 220 local places. This gives the SPPS model a better chance of being realistic.

Nowhere is it indicated how the range of 400 to 550 local children is arrived at, nor to which year or years this range applies. It appears to derive from applying the inappropriately high take-up rate of 88% to the total maximum possible numbers of Year 6 leavers in the years shown in the second table on P18:

88% of 463 (in 2017) is 407,

88% of 622 (in 2023) is 547.

Applying the model to the data for 2017, we find that it predicts a shortfall of:

$$407 - 220 = 187.$$

No such shortfall occurred. According to SPPS, in March 2017, 85 children from these schools remained to be placed in secondary schools in the east, and the Council was confident that they would eventually be offered places closer to home.

Let us apply the model to the data from 2016 – this time, real data.

88% of 410 is 361,

predicting a shortfall of $361 - 220 = 141$.

This shortfall did not occur in 2016.

Using real data from 2015, 88% of 373 is 328,
predicting a shortfall of: $328 - 220 = 108$.

Nothing like this shortfall occurred.

An elementary test of a predictive model is that it should fit the data in cases where the inputs and outcomes are known. This model comprehensively fails this elementary test: the predicted shortfalls are ludicrously high.

The predictions for future years are even more unrealistic, because the data in the table are not actual cohort sizes but total *class capacities* (derived from Appendix 1 of SPPS).

For the record, we can derive the prediction for 2023 as follows:

88% of 622 is 547,
predicting a shortfall of $547 - 220 = 327$.

2.3 A better prediction of local secondary shortfall

We have seen that the SPPS prediction on p16 of 185 for overall secondary shortfall in the east in 2023 must be too high because it is based on an unrealistically high take-up rate of 88%. The prediction of shortfall in secondary places for local children, which ranges from 187 in 2017 to 327 in 2023, is worthless because the model does not fit known data.

Undoubtedly, however, there will be some need for extra secondary places in the neighbourhood of Mortlake: what might that need be? The following simple arithmetic argument is due to Academy Advisory:

2.3.1 A simple prediction of need

According to the table on p18 of SPPS, in 2017 there was a maximum Year 6 cohort in the 9 non-Catholic primary schools within RPA's vicinity of 463. These are the pupils whose demand for secondary places has been used by SPPS to forecast need for secondary places in the neighbourhood of Mortlake. Although, as SPPS comments, 85 of these pupils had not been found places in the east by March 2017, we shall assume that they were eventually all accommodated. RPA admitted its usual quota of 50 out-borough students and in September 2017 had 35 vacancies.

Thus, a *Year 6 capacity* of $463 + 35 = 498$ pupils could have been accommodated in 2017.

This is an underestimate, since not all of the extra 35 pupils would have applied for places in Richmond secondary schools (there is a drop-off rate).

Now consider the predicted maximum Year 6 cohort for 2023 in the same table on p18. It is 592 (we have corrected the arithmetic in the table, which can be seen to be inaccurate).

$$592 - 498 = 94.$$

Thus, it is predicted that, in 2023, 94 more pupils will need to be found places than could have been accommodated in 2017 with no further secondary capacity.

This is an overestimate of the shortfall, since not all of the 94 extra pupils in the 9 schools will apply for Richmond secondary places. Indeed, the total of $35 + 94 = 129$ will be

subject to drop-off.

This simple arithmetic shows that the maximum likely requirement for extra secondary places in the east of the borough is in the region of 3 FE. Any claim that considerably more space will be required must be supported by a convincing argument. There is no such argument.

2.3.2 Using historically based take-up rates to predict future need

We can readily understand that the above simple arithmetic is not something that SPPS would want to imitate in its own predictive models, so we now describe a method that we shall later recommend the Council to use with the better data that is available to them.

In the application of their model, SPPS used a take-up rate of 88%. This is unrealistically high for the eastern half of the borough. It is of interest to discover what the SPPS model would have predicted if a more realistic take-up rate had been used. Our first task is to estimate this true take-up rate.

We have data on the intake at RPA from primary schools in Richmond and Wandsworth, together with the intake from other out-borough primary schools, for the years 2010 to 2017. In 2014, RPA admitted more than twice as many pupils from the 9 schools as in any previous year, while maintaining intake from Wandsworth schools. See Table 1.

Table 1. Intakes at RPA, by primary school location

	2013	2014	2015	2016	2017
9 in-vicinity schools	38	99	96	91	93
Wandsworth schools	39	45	47	48	43
Other in-borough	1	1	4	6	2
Other out-borough	25	33	21	19	7
Total	103	178	168	164	145

2014 was an outstanding year for total intake but, as Table 1 shows, intake from the 9 schools and from Wandsworth has been maintained at approximately the same level since. Intake from other out-borough schools in 2014 was in line with that of previous years but has since declined. Although the intake in 2017 was kept low because of staffing problems, it was mainly other out-borough admissions that were affected. Thus, there has been reasonably stable uptake of places at RPA from the 9 schools and from Wandsworth for the last four years, from which it is sensible to estimate take-up rates.

We do not have data from Christ's School so we have to rely on the assumption in SPPS (p19), that in each year 75 leavers from the 9 schools obtain Open places and 10 to 15 leavers from Holy Trinity obtain Foundation places. The fixed nature of this assumption over time makes it questionable, but we have checked using some primary school data for 2017 that it is at least reasonable for that year.

We have assumed that 15 leavers from Holy Trinity obtained Foundation places in 2015, 2016 and 2017. This maximises the (estimated) take-up rate of places in Christ's and RPA in each of those years. These are shown in Table 2.

Table 2. Estimated take-up rates from the 9 schools

	2015	2016	2017
RPA intake (actual)	96	91	93
Christ's intake (estimate)	90	90	90
Total intake	186	181	183
Year 6 cohort	373	408	454
Take-up rate	50%	44%	40%

Note that the Year 6 cohorts for 2016 and 2017 are smaller in Table 2 than in the SPPS table on p18. This reflects the information obtained by Academy Advisory from Barnes, East Sheen and Sheen Mount primary schools on their true Year 6 cohort sizes in 2016 and 2017, as shown in Table 3:

Table 3. True cohort sizes compared with SPPS

	2016		2017	
	True	SPPS	True	SPPS
Barnes Primary	59	55	55	60
East Sheen Primary	56	60	60	60
Sheen Mount	53	55	56	60
Total, 3 schools	168	170	171	180

It will be seen that the true total Year 6 cohort size in 2016 is at least 2 less than reported by SPPS and that for 2017 at least 9 less. This is not particularly surprising for 2017, since the SPPS figures are based on school *capacities*. But it is somewhat surprising for 2016, where the SPPS figures are stated to be actuals. It suggests that there might be other inaccuracies in the table on p18. (The totals for 2022 and 2023 are indeed inaccurately computed.)

The effect of the minor changes to the Year 6 cohort sizes reflected in Table 2 is to increase slightly the estimated take-up rates, but by less than 1%.

Note at once that these take-up rates are considerably lower than the 88% assumed by SPPS.

Had we assumed that 10 Holy Trinity leavers obtained Foundation places at Christ's instead of 15, the take-up rates would have been estimated to be 49%, 43% and 39%. Actual intake figures for Christ's, available to the Council but not to us, would yield accurate take-up rates for the years 2015 and 2016, which could be extended to 2014 and 2017 with data on true Year 6 cohorts and intake figures, also available to the Council.

We now use the SPPS model to tabulate predictions of secondary space and shortfall in the east of the borough, for varying take-up rates from the 9 schools within a reasonable range. We have used the lower number, 10, of assumed Foundation places for Holy Trinity leavers in order to maximise the predicted shortfalls for a given assumed take-up rate. An assumption of 15 Foundation places instead of 10 would increase the space and reduce the size of shortfall by 5 in every case. Thus, Table 4 presents the worst case estimated by the model for each assumed take-up rate.

Table 4. Space and shortfall (negative) predicted at RPA for different take-up rates

	2015	2016	2017	2018	2019	2020	2021	2022	2023
Year 6 cohort	373	410	454	463	510	558	562	562	592
40% take-up rate	66	51	33	30	11	-8	-10	-10	-22
45%	47	31	11	7	-15	-36	-38	-38	-51
50%	29	10	-12	-17	-40	-64	-66	-66	-81
55%	10	-11	-35	-40	-66	-92	-94	-94	-111

Note that spare space and shortfall is modelled to occur at RPA only. The model assumes that in every year 85 spaces at Christ's (10 Foundation and 75 Open) will be taken by Year 6 leavers from the 9 schools.

We see no reason why the take-up rate should increase appreciably as Year 6 rolls increase. It has, in fact, decreased as rolls have increased over the last three years (see Table 2). The final row is included in Table 4 to show that only if take-up rates increase to more than 55% will more than three extra FE be required by 2022. Assuming, conservatively, that take-up rates will remain between 40% and 50%, three extra FE will remain sufficient until beyond 2023.

Both the elementary arithmetical approach in Section 2.3.1 and the approach based on historical take-up rates in this section have led to similar estimates of need by 2023. This suggests strongly that the true need for extra secondary places by 2023 can be satisfied by no more than 3 extra FE.

If this is true, it demonstrates that there is no requirement to build a new secondary school on the Stag Brewery site. On the contrary, to do so would risk creating non-viable sixth forms in all three secondary schools in the neighbourhood. The extra places could be provided much more economically by expanding RPA by 1FE and Christ's by 2FE and, as the following section shows, this expansion is already needed by these schools to make them viable.

3. Next steps

The Council has a duty not only to provide secondary places for those children in its primary schools who wish to take them up but also to ensure the long-term viability of its existing secondary schools. Two of these, RPA and Christ's, both within a mile of the Stag Brewery site, will not remain viable even in the medium term unless they are enabled to enlarge their sixth forms.

A viable sixth form, according to government guidelines, must contain at least 200 pupils and offer at least 15 A-level subjects. The minimum of 15 subjects is to provide adequate choice; the minimum of 100 students per sixth form year-group is to ensure A-level sets of an economic size.

On average, in a non-selective secondary school, only 50% of a year-group will go forward to sixth form study in the same school. The rest either do not qualify or, having qualified, choose either a vocational route or sixth form study in a different school or college.

This 50% of the year-group must amount to at least 100 pupils if the sixth form in the school is to be viable. Hence the year-group must contain at least 200 pupils and the overall size of the school must be at least 1200.

Another way of putting this is: if a school has 200 pupils in each year-group from Year 7 to Year 11 (the GCSE year), then, on average, it will be able to support a sixth form of 200 pupils: one-sixth of its overall size. If a school's sixth form is less than one-sixth of its overall size, this means that fewer than half of its students are choosing to stay in that school for the sixth form.

To be safe, the school must be 7FE.

This is demonstrated by the figures for local, and some less local, secondary schools:

Richmond Park Academy	overall 771, sixth form 67
Christ's School	overall 801, sixth form 93

Compare:

Grey Court School, Ham	overall 1342, sixth form 235
Orleans Park School, Twickenham	overall 1211, sixth form 201

Chiswick School in Hounslow, just across the river from the Stag Brewery site, also follows this pattern, with a total of 1277 pupils including a sixth form of 200.

All figures are from the latest Ofsted Reports on the schools concerned.

RPA and Christ's sixth forms are clearly non-viable. This presents them with an additional danger, for the relationship between school size and sixth form size is not linear. If you halve your school size, for example, you do not halve your sixth form size: you reduce it by a lot more than that. This is illustrated in the following table, which shows the five schools just mentioned in ascending order of overall size with, for each school, its sixth form size, the percentage this represents of its overall size, and the percentage uptake by its students of sixth form places in the school.

Table 5. School size, sixth form %, and % uptake within school

School	Overall	Sixth Form	% Total	% Take-up
RPA	771	67	9%	24%
Christ's	801	93	12%	33%
Orleans Park	1211	201	17%	50%
Chiswick	1277	200	16%	46%
Grey Court	1342	235	18%	53%

The pattern is clear: if a school drops significantly below the minimum size to support a viable sixth form it becomes disproportionately less successful at keeping and attracting sixth form students. There is a reason for this. A small sixth form cannot offer the same choice of subjects as a large one. More pupils in the school who might have stayed choose to go elsewhere and fewer pupils choose to join its sixth form from elsewhere.

It is, therefore, of paramount importance that RPA and Christ's be expanded to allow them to support viable sixth forms. Both have the space on their sites to accommodate, respectively, the extra capacity that they require in order to meet government guidelines. For their viability, this extra capacity must be provided for them before considering any extra provision elsewhere.

SPPS notes (p17):

It is likely that some or all of Christ's, Grey Court and RPA could be permanently expanded by a form of entry; but the maximum of 90 places created would be insufficient to meet the forecast increased demand by 2020. All three sites have been developed in recent years and sufficient capital funding is not currently available to pay for such expansions; nevertheless, those options will be explored.

We would point out:

1. Christ's can, and needs to, expand by at least 2FE.
2. RPA can, and needs to, expand by at least 1FE.
3. The extra 90 places provided by these two expansions would, according to our prediction in Section 2, which the Council can verify as we recommend in Section 4, closely match the demand for additional local secondary places by 2023.
4. Building a new school in the same neighbourhood would permanently compromise the viability of Christ's and RPA, with or without sixth forms.
5. It would be far less expensive to provide the 90 extra places by expanding these two existing schools than by building a new one.

Thus, if the Council expands these schools as we recommend, not only will future demand for secondary places by local primary school leavers be satisfied but also those very children will ensure the continued viability of RPA and Christ's as secondary schools with sixth forms.

As for the funds, central government would surely recognise that such a course would be more rational and economical than to build, equip and staff a brand-new school at the risk of destroying the viability of these existing schools.

4. Towards a better school place planning strategy

We now return to SPPS to amplify the comments we made in Section 2 and pick up on other issues of concern. We begin with an extension of our treatment in Section 2 of the two predictions

1. of future borough-wide shortfall (p16)
2. of future demand for secondary places in the neighbourhood of Mortlake (pp18 and 19)

In Section 2, our aim was to establish quickly that these two predictions are faulty. Now we go into more detail about the kinds of improvements that would better inform these predictions and clarify them for the public. The extracts used in Section 2 have been repeated here for convenience.

4.1 Prediction of borough-wide secondary shortfall

We repeat the earlier extract from p16:

In September 2017, seven of the 11 schools were at capacity in Year 7; the other four between them had 180 spare places. Once Turing House becomes established on its proposed permanent site, which is expected to happen in 2020, the three new schools in the borough will, between them, have added 450 extra Year 7 places since 2013. At present those three schools have provided enough places for the western half of the borough for the remainder of this decade. Beyond that point, it is expected that capacity difficulties will first be cushioned by fewer out-borough children being able to access places in the eight schools west of the Thames. The table below shows the actual (for 2017) and anticipated (from 2018 onwards) surpluses and shortfalls of places in the western and eastern halves of the borough, and then by the borough as a whole:

Year	2017		2018		2019		2020		2021		2022		2023	
	PAN	NoR	PAN	NoR	PAN	NoR	PAN	NoR	PAN	NoR	PAN	NoR	PAN	NoR
Western half	1432	1302	1457	1392	1432	1432	1482	1482	1482	1482	1482	1482	1482	1482
Eastern half	570	550	570	540	570	570	570	570	570	570	570	570	570	570
Total	2002	1852	2027	1932	2002	2002	2052	2052	2052	2052	2052	2052	2052	2052
Year 6 cohort	2067		2169		2343		2428		2556		2550		2542	
88% retention			1932		2062		2137		2249		2244		2237	
Space/shortfall	150		70		-60		-82		-197		-192		-185	

PAN = published admission number; NoR = number on roll. General take-up rate from Year 6 assumed at 88%. Conversion rates from Reception to Year 6 average at 100%, so Year 6 totals from 2016 entry derive from the relevant year-groups in the October 2016 census.

As can be seen, the availability of places between the two halves of the borough is unbalanced. Traditionally, the drop-off to the private sector in the eastern half has been much higher than in the western half and that remains the case. ...

Comment:

1. Space (spare secondary places) in 2017 is listed in the table as 150, whereas the text states that there were 180 spare places. There is also an inconsistency in the table entries for 2018. Simple errors of this sort should obviously be minimised by careful checking.
2. The take-up rate is stated in the note to the table to be 88%. But its use across the table is inconsistent. The predicted shortfalls for years 2019 to 2023 are calculated by applying this take-up rate to the predicted Year 6 cohort for each year. But the shortfall for 2018, also a prediction, is not predicted in the same way.
3. It is not clear by what logic a 'take-up rate' is applied to a Year 6 cohort of in-borough students in order to predict a NoR which includes a variable number of out-borough students. In the year 2017, the NoR was 1852. This is not 88% of 2067, but 89.6%. However, this difference is not sufficient to allow for enough out-borough entrants. What is going on here?
4. SPPS needs to explain how the take-up rate of 88% has been estimated, and what allowance has been made for out-borough entrants. At present, it appears that no allowance is made.
5. The note to the table indicates that Year 6 cohorts are predicted on the assumption of 100% average conversion rates in the primary schools from Reception to Year 6. In other words it is assumed that, when combined across the schools in each half, the numbers of children entering Reception in 2016, for example, will (after additions and subtractions during the 7 intervening years) convert into the same number leaving Year 6 in 2023. SPPS needs to justify this assumption, both historically and in the light of changed circumstances, in which primary heads are reporting some degree of drop-off between Reception and Year 6.
6. SPPS states, without evidence, that after the end of this decade fewer out-borough children will be able to access places in the eight secondary schools west of the Thames and from this it assumes that all the shortfall will occur in the east. It admits that drop-off to the private sector remains much higher in the east than in the west yet it uses the same borough-wide estimate of take-up rate (88%) to predict a shortfall supposedly occurring only in the east. This is illogical.
7. The predictions in this table should be informed by a historical study of true take-up rates of places in borough schools in each half of the borough, separately, over a period of at least five years (say, 2014 to 2018 inclusive). Such a study would yield not only an average rate but also information on variation. Recall our work in Section 2.3.2 on RPA.
8. Out-borough intake is a separate matter, and a similar historical study will yield similar information about this: an average number (for each half of the borough) and an estimate of the variation.
9. From this work, separate estimates of total surplus and shortfall in the east and the west could reasonably be calculated and explained, along with an estimate their variation.
10. Such work, updated year by year, will be invaluable for judging the effects of the three new schools, and also the true trends in out-borough intake, in the east and the west.

4.2 Prediction of secondary demand from the 9 schools

Where Section 4.1 was generally applicable across the borough, this section is more specific. We wish to highlight some of the problems that have led to the extraordinary predictions that we saw in Section 2.2, and how they might be prevented in a future similar exercise where insufficient supply of secondary places is predicted. This rather detailed work is needed in order to arrive at a realistic estimate of the true need for extra secondary places in RPA and Christ's for Year 6 leavers in the 9 schools. We first take a closer look at the table of predicted numbers of these leavers on p18, with the immediately succeeding remarks:

	2015	2016	2017	2018	2019	2020	2021	2022	2023
Barnes	58	55	60	60	60	90	60	60	60
Darell	24	24	43	43	60	60	60	60	60
East Sheen	57	60	60	60	90	60	90	90	90
Holy Trinity	51	59	60	90	60	60	60	60	60
Kew Riverside	28	26	30	30	30	30	30	30	30
Lowther	47	43	60	60	60	60	60	60	60
Marshgate	54	88	90	60	60	90	60	60	90
Sheen Mount	54	55	60	60	90	60	90	90	90
Thomson House						48	52	52	52
Total	373	410	463	463	510	558	562	592	622

Actual (in 2015 and 2016) and maximum possible (from 2017–2023) numbers of Year 6 leavers at the nine non-Catholic primary schools within Richmond Park Academy's vicinity

In the last two years, there were a significant number of children in the eastern half of the borough, mostly in Barnes and Kew, for whom offers couldn't be made at any of the three local schools in March, at the initial allocations stage. In March 2017, 85 children from the eastern half of the borough have either been offered secondary school places in the western half of the borough or haven't yet been offered places at any school. Whilst we are confident, based on previous years' experience, that in the next few months those children will be offered places from the waiting-lists at schools closer to home, we know that in future years the numbers of children due to transfer from primary to secondary school will substantially increase to the point where the capacity in the three schools in the eastern half of the borough will be nowhere near enough to meet the need for places in September.

Comment:

1. The numbers of leavers in the table are certainly maximal for the years 2017 to 2023 (see the note to the table), since they are based on Reception *capacities* 7 years earlier, as given in Appendix 1 of SPPS. The first question to ask, therefore, is why this method was used to estimate Year 6 leavers instead of the method based on actual cohorts that was used in the table on p16. The entries in this table should be re-computed on that basis, in which case the following two observations relating to simple errors will become redundant.
2. There is a discrepancy in the table. Marshgate is listed as having 90 Year 6 leavers in 2023. This would imply that it admitted a bulge year in 2016. But Appendix 1 lists Marshgate's 2016 intake capacity as 60.

3. There are arithmetical errors in the final two columns. The 2022 total should read 562; that for 2023 either 562 or 592, depending on the correct entry for Marshgate.
4. It would be useful to include in the table the *actual data* for the five years 2014 to 2018.
5. For each of these five years, SPPS should tabulate, for applicants from the 9 schools, how many (a) had not been offered a place in the east by March, (b) how many of these eventually obtained a place at a school in the east, (c) how many obtained a place at a school among their preferences in the west, (d) how many obtained a place at another Richmond secondary, and (e) how many dropped out of the Richmond state sector. This would have two benefits: first, it would clarify an important part of the process of school placement; second, it would enable true take-up rates by pupils in the 9 schools of places at RPA and Christ's to be accurately calculated for five years. From these take-up rates more reliable estimates of future demand for places at these schools could be estimated, by a method similar to the one described in Section 2.3.2, along with an estimate of their variation.

SPPS continues (pp18–19):

That assessment [that capacity will be nowhere near enough] takes note of the following assumptions, that in any given year:

- *10–15 Holy Trinity leavers would be likely to obtain 'Foundation' places at Christ's;*
- *due to their proximity to the school, c. 50 Wandsworth Borough children would always be likely to obtain places at Richmond Park Academy (in 2016, 74 out-borough children were offered places at Richmond Park Academy, and the closest Wandsworth secondary school, Ark Putney, has become more popular and is forecast to become oversubscribed in the next few years, which will make it harder for children living on the Lennox Estate to obtain places there);*
- *the increasing numbers of secondary school places in Hounslow Borough will be filled by increased demand from children attending Hounslow primary schools;*
- *there will always be a certain percentage of the increased numbers of children entering private sector schools at Year 7;*
- *Whilst parents could also apply for places at Grey Court, they would be competing with parents of children living much nearer – in Ham, Richmond and North Kingston – and they would be highly unlikely to be successful. It should also be noted that two Richmond Borough primary schools near Grey Court – The Vineyard and The Russell – have been, respectively, fully and partially expanded recently, and all the non-faith primary schools in the North Kingston area of Kingston Borough have been permanently expanded since 2011. (However, the opening of The Kingston Academy in North Kingston in 2015 has offset some of that growth in numbers feeding through from the primary phase.)*

Effectively, then, there would be 400–550 local children competing for 205 local places – the 75 'Open' places at Christ's and the remaining 130 places at Richmond Park Academy – so the Council would be unable to meet its statutory duty to provide places for those children unless a new school were provided.

Comment:

Several of these assumptions are questionable, and one has been ignored.

6. In fact, there are 100 Open places at Christ's and 50 Foundation places, the latter being available to pupils who can provide satisfactory evidence of church attendance, whether or not they attend Holy Trinity. It would be useful to know, for the years 2014 to 2018, how many Foundation places at Christ's (in total) and how many Open places at Christ's were eventually taken up by children from the 9 schools, how many from other primary schools in Richmond, and how many from out-borough primary schools.
7. In 2016, 67 places at RPA were eventually taken by out-borough applicants. Actual intake from Wandsworth schools has remained steady around 45 since 2014, while other out-borough intake has fallen. See Table 1 in Section 2. This is information that should be gathered and compared over time rather than simply assumed.
8. It is not clear whether full and informed liaison with neighbouring London boroughs has taken place. This has a bearing on the assumptions above about effects of developments in Hounslow, Wandsworth and Kingston on Richmond's secondary provision in the east of the borough. It is also relevant to the assumption made, without evidence, on p16, that demand for secondary places in the west by Hounslow residents will decrease from the end of the decade. We shall return to this point later.
9. It is observed (assumption 4) that there will always be a certain percentage of the increased numbers of children entering private sector schools at Year 7. Well, quite. Have any studies of this been carried out? Again, we return to this later.
10. Using the information on take-up at Christ's and RPA gleaned from the actual data for the years 2014 to 2018, a more refined predictive model should be built, using a historically based range of possible take-up rates at both schools and re-computed Year 6 leaver data for the 9 schools based on actual cohorts. This should yield realistic predictions of future demand for secondary places at RPA and Christ's.
11. Our own work using a range of historically based take-up rates applied to the inferior data in the table on p18 (see comment 1 above), which we reported in Section 2.3.2, has suggested that at most an additional 3FE should satisfy predicted secondary demand from pupils in these schools by 2023. We suspect that the similar work recommended in 10 above will yield a similar or lower estimate.

4.3 Other improvements to SPPS

It is noticeable that three-quarters of the SPPS for the secondary phase concentrates on the east of the borough and much of the attention in this three-quarters is on RPA. Scant attention is given even to Christ's School, whose provision is assumed to be static. This is unbalanced. SPPS should lie at the heart of the borough's strategy for planning provision. There is very little in the present document that that would count as strategy for planning secondary places. There is plenty of unsupported or meaningless assertion.

It is by no means established, for example, that, as claimed on p16, fewer out-borough children will be able to access places in the 8 secondary schools in the west after the end of the decade. If out-borough children live closer to these schools than the Richmond residents they are designed to serve, they will get precedence. Our Figure 1 shows that Twickenham Academy, Hampton High, the Richmond upon Thames School, Teddington and the proposed new site for Turing House are all close to the borough boundary and, therefore, vulnerable to out-borough 'poaching' of places.

Or consider the following (pp17–18):

Although the Council enabled the increase of the published admission number (PAN) of Christ's 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 RPA's vicinity have grown at a commensurately greater rate, as shown by the table below:

	2011	2012	2013	2014	2015	2016	2017
Barnes	407	409	446	447	442	444	447
Darell	224	246	268	279	291	310	307
East Sheen	417	444	438	469	493	537	560
Holy Trinity	308	354	398	407	431	446	433
Kew Riverside	196	195	201	198	202	196	190
Lowther	250	287	316	339	363	349	339
Marshgate	429	451	469	466	475	476	451
Sheen Mount	404	430	438	470	503	533	563
Thomson House			48	99	157	208	260
Total	2,635	2,816	3,022	3,174	3,357	3,499	3,550

Roll numbers, 2011–2016, at the nine non-Catholic primary schools within Richmond Park Academy's vicinity

SPPS declares that these 9 schools have 'grown at a commensurately greater rate' – than the combined PAN of the secondary schools. But of course they have. The figures in this table are the total sizes of the schools. Once you expand a school's Reception intake, the school continues to grow in overall size for 7 years as the increased capacity of the year-group works its way up the school. But there is still only one year's worth of increase in that school's eventual Year 6 cohort. Thomson House provides a simple example. It 'gained' almost 2FE in 2013, by opening. Since then, it has increased in overall size every year by approximately 50 and in 2017 was 260 pupils bigger than in 2012. But it will still have only 48 (at most) in its Year 6 cohort starting in 2020. The two measures used to compare the rates of growth in the primary and secondary

schools are simply not commensurate.

There are 4 further tables on p17 which combine first preferences, total preferences and Year 7 starters in the same table, for example:

	2011	2012	2013	2014	2015	2016	2017
First preferences	42	73	59	115	175	119	118
Total preferences	255	303	289	422	592	576	536
Year 7 starters	100	115	103	184	168	166	160*

Year 7 application and starter numbers, Richmond Park Academy, 2011–2017. * estimated number

What purpose is served by putting these numbers in the same table? We are not told how many of the first preferences or of the total preferences actually are represented among the Year 7 starters. It seems that this table, like 3 other similar tables on the same page, serves only one purpose, which is to show that the numbers are getting bigger.

That makes 5 out of 8 tables in the Secondary Phase section of SPPS that convey essentially no useful information. This is a total waste of space.

There has been unthinking use of a 'borough-wide' take-up rate, assumed to be 88%, but this figure is not explained. Our Figure 1 shows that, St Paul's, Ibstock Place and the Harrodian School are independent schools within easy reach of the north-east of the borough. What it does not show is that other prestigious independent schools, Latymer Upper, Godolphyn and Latymer, Putney High and St Paul's Girls' School, are within easy reach by bus. It is clear that with this plentiful supply, a relatively high proportion of parents are choosing the independent route. It makes no sense for SPPS to note this in passing and then ignore it in their predictions of demand of secondary places.

What this figure also shows is that there are a considerable number of state-funded schools in other boroughs close to the border of Richmond. It is expected that there would be active sharing of information to ensure efficient provision near the borough boundary.

There is no mention of sixth form provision. This is a serious omission. We have drawn attention to the present non-viability of RPA's and Christ's school's sixth forms, but these cannot be the only schools in the borough with non-viable sixth forms. Many schools, which followed government encouragement to create sixth forms before new minimum criteria for allowing them were established, are now facing problems of financial and educational viability. What is the Council's strategy? It appears to have allowed RPA's and Christ's sixth forms to languish in an unviable state without any plan to help them deal with this. On the contrary, the Council was planning, with no demand to justify it, to create a new 6FE secondary school with sixth form very close by, which would have the effect of making these schools less viable as schools with sixth forms, and possibly destroying the viability of at least one of them completely.

There has traditionally been an assumption that parents of children living east of the Thames are unwilling for them to travel to secondary schools west of the Thames. We question whether this assumption is supported by parents' stated preferences, and whether this will continue to be the case now that new schools have been created within relatively easy reach by public transport. See the maps provided in the Figures, below. An updated SPPS will need to keep in mind that parents' perceptions will not remain fixed as new schools become established and reputations change.

We recommend the following improvements to the SPPS:

1. Statements unsupported by evidence, and uninformative tables, should be avoided.
2. In a similar way to the treatment by area of primary schools in the current SPPS, each secondary school, being relatively large, should have a page to itself.
3. There should be a full treatment of sixth form provision, including a strategic view of the borough as a whole and more detailed information on individual schools.
4. In particular, plans to provide for increased secondary demand from primary schools should be aligned with plans to ensure viability of existing secondary schools with sixth forms.
5. While it is recognised that the Council has a statutory duty to ensure the provision of school places, LBRuT, as a riparian borough, should have a policy of consultation and planned cooperation with neighbouring boroughs, who have responsibilities to their own populations. This strategy should be made explicit in SPPS.
6. The existence of transport links both from east to west within the borough and across borough boundaries, should be actively considered as part of the strategy.
7. The section on *Financial Implications*, which currently runs to barely half a page, should be expanded and aligned more specifically to areas of need identified in the rest of the document.
8. In the introductory section, currently entitled *Background* (pp3–4), the detailed assumptions used for population growth, and how this translates into increased pupil numbers in both the primary and secondary phases, should be clearly presented. Assumptions about Brexit, for example, and the impact that this is currently having on the availability of school places should be made explicit.

5. Conclusion and Recommendations

We have demonstrated in Section 2 that the Council's method of predicting secondary demand by Year 6 leavers in the 9 schools leads to ludicrously high estimates. We have further demonstrated that the same (relatively crude) model using already inflated data on Year 6 cohorts will, if a historically based take-up rate is applied to these inflated cohort sizes, yield a predicted demand for 2023 in the region of 90 places. In Section 4 we have asked that the Council derive their own estimates of future take-up rate by these leavers, by using actual secondary intake data from the five years 2014 to 2018. We have asked that they then rerun the SPPS predictive model, using a range of take-up rates based on the data from 2014 to 2018, and applied to improved data on primary cohort sizes. In Section 2.2 we have shown the Council in principle how to do this.

If the Council does this, it will be able to verify our finding that all additional secondary demand from local children by 2023 will be satisfied by expansion of Richmond Park Academy and Christ's School by a total of 3FE. Even if the Council's predictions based on improved data and models are only approximately similar to our own, that outcome would be a happy one:

1. Future secondary demand in the east, as far ahead as can reasonably be estimated, would be satisfied without the need for a new secondary school.
2. The pupils would exist in the neighbourhood to allow RPA and Christ's to become fully viable as secondary schools with sixth forms.
3. It would be possible for the Council to revert to the Planning Brief proposal for a 2FE primary school on the Stag Brewery site. This proposal should then form the basis of an amended Planning Application.

It is urgent that this investigation be carried out by the Council as soon as possible.

Richmond Park Academy and Christ's School depend for their continued existence as secondary schools with sixth forms on being allowed to expand. The Council has a duty, not only to ensure the adequate provision of secondary places to meet forecast demand, but also to ensure so far as possible the continued viability of the existing secondary schools.

Any decision on the Planning Application must allow the Council to discharge this duty.

The recommendations we make in Section 4 for improving SPPS will not only improve Planning Application B, alongside which that document should be considered, but also enable the Council to discharge its wider duty to the rest of the borough's primary and secondary schools. The current SPPS document cannot serve this function.

We urge the Council to abandon its plan to build a new secondary school on the Stag Brewery site and revert to the Planning Brief proposal for a 2FE primary school.

We further urge that this 2FE primary school should be Thomson House school, re-sited from its present dangerous position to a suitable position on the Stag Brewery site.

We also urge the Council to ensure that any future decisions regarding the development or expansion of schools are taken with full and proper consultation with all interested parties.

Figures

1. Secondary schools in borough and environs (map base from Borough Local Plan)
2. State primary schools that feed secondary schools near the Brewery site

Figure 1: Secondary schools in borough and environs (map base from Borough Local Plan)

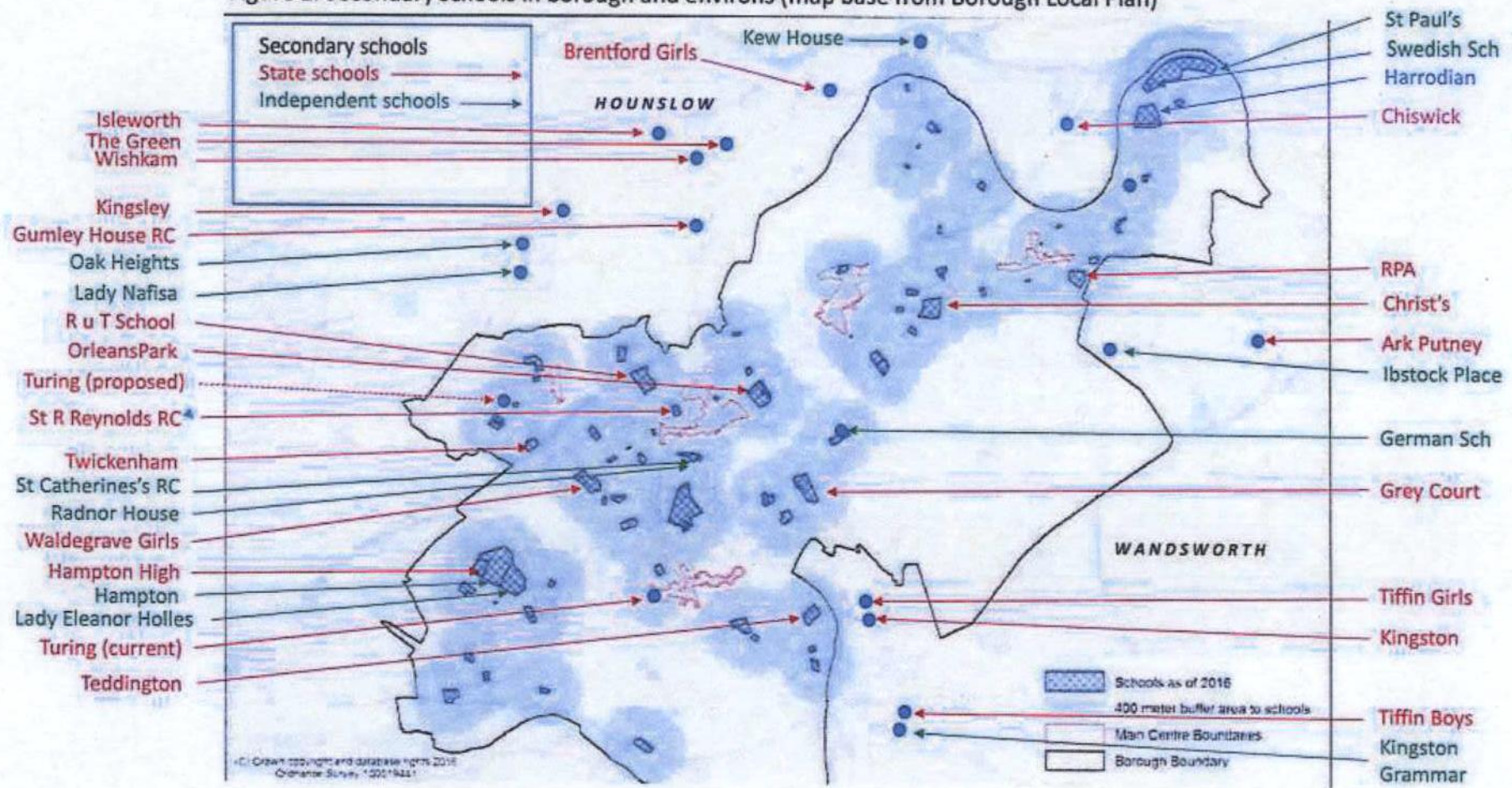
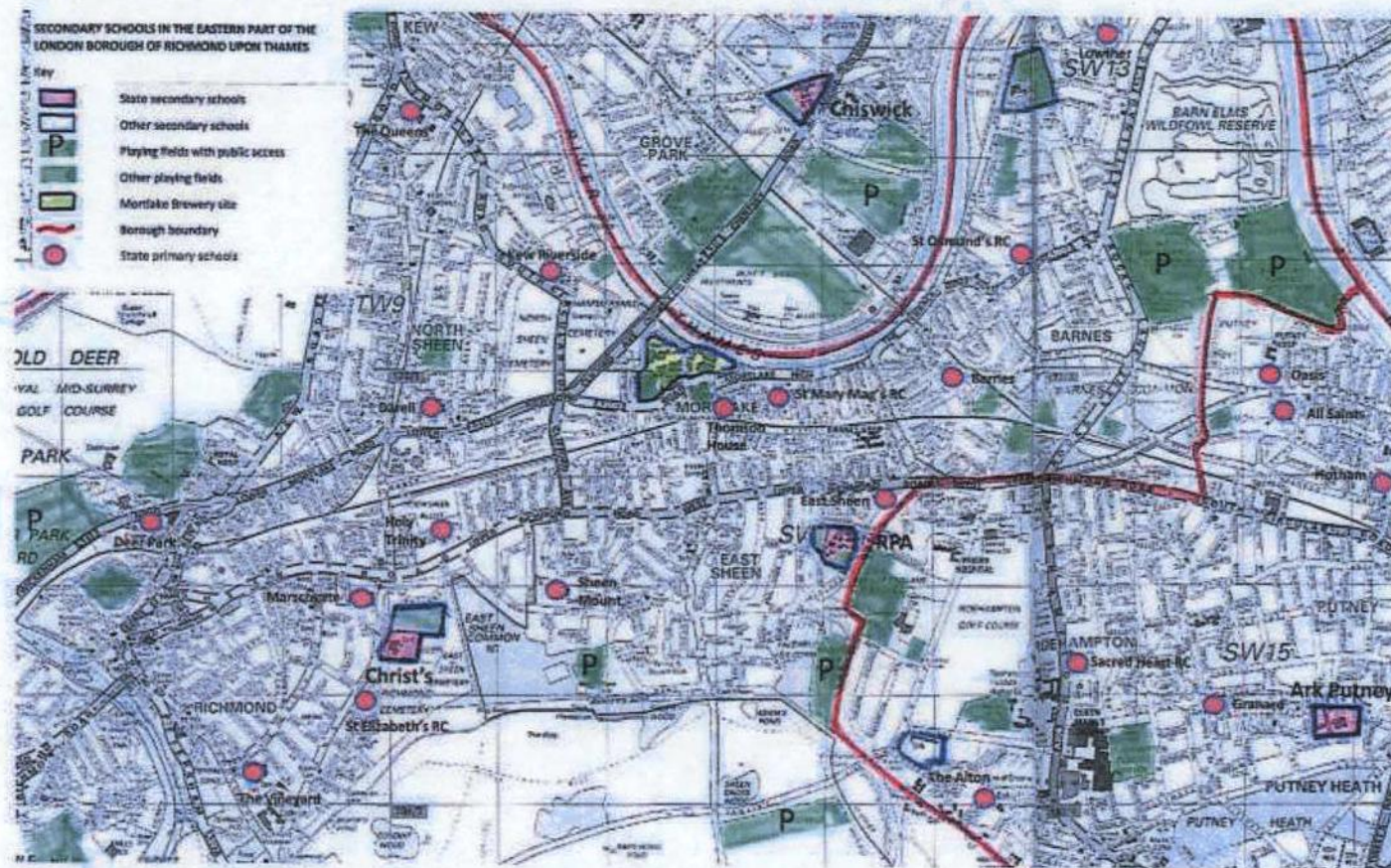


Figure 2: State primary schools that feed secondary schools near Brewery site



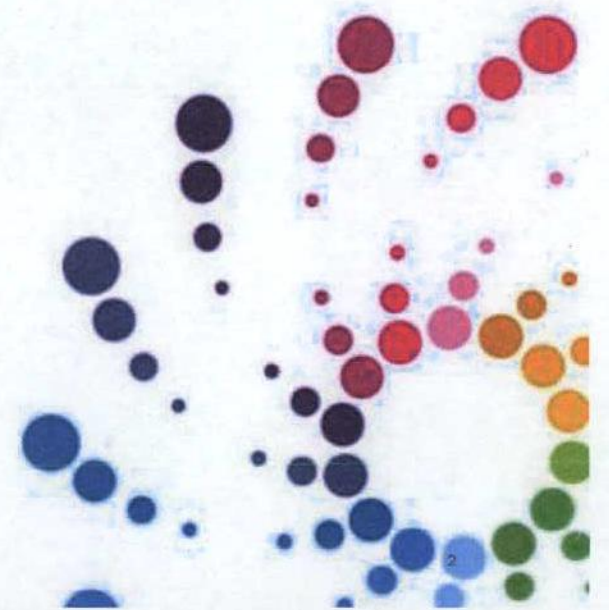


Appendix A

Educational Demand Study
Academy Advisory

Contents

Page	Section
3	Introduction
4	Summary of findings
14	Appendix I – summary of “further questions for the Local Authority”



Introduction

Background

We have been appointed by Mortlake Brewery Community Group (referred to as the "MBCG") to review the London Borough of Richmond Upon Thames' (the "Local Authority") educational rationale for the proposal for a new secondary school at Mortlake, identifying any inconsistencies, raising necessary questions and reporting our findings.

Our Approach

The approach adopted covered the following key areas:

- Desktop research was undertaken to review the Mortlake Brewery proposal and supporting education strategy documents produced by the Local Authority in support of the development.
- We have made contact with a number of representatives from local schools and academies to obtain their views as to the proposed development and to supply supporting information, to assist us in challenging the robustness of the Local Authority's proposals.

The key focus of our work has been to establish whether or not, (in theory and on the basis of reasonable assumptions), there is sufficient demand for secondary places to support the need for an additional school at Mortlake.

Included in our letter of engagement is a statement that we cannot guarantee we will be able to form an opinion in this regard, as this is dependent on the level of data available to us following interviews and review of Local Authority reports.

Scope and limitations

This report is part of a continuing dialogue between the MBCG and Academy Advisory Ltd and is therefore not intended to cover every matter discussed or identified during the course of the review. For this reason, the report is intended for the sole use of the MBCG.

We do not accept any responsibility to any member acting in an individual capacity, and do not accept responsibility for any reliance that third parties may place on the report.

Our work has been limited in scope to an assessment of the available information and to raise key points noted following this review.

Summary of findings

There are a number of significant issues and inconsistencies in the reports supporting the Local Authority's proposals that have been identified and require further investigation and clarification.

We have set out a possible "alternative interpretation" at page 16, which casts doubt on the need for this development on the basis of information provided in the School Place Planning Strategy and supplementary information obtained as part of this review.

At this stage, there is a lack of clear information that would be required to give a firm conclusion that the proposed new school on the site of the legacy Mortlake Brewery is required.

We detail the findings from our work in section 2 of this report. Appendix I includes a summary of the issues and points that require further clarification.

2. Summary of findings



Review of the Proposal for Mortlake Brewery

Review of the education strategy

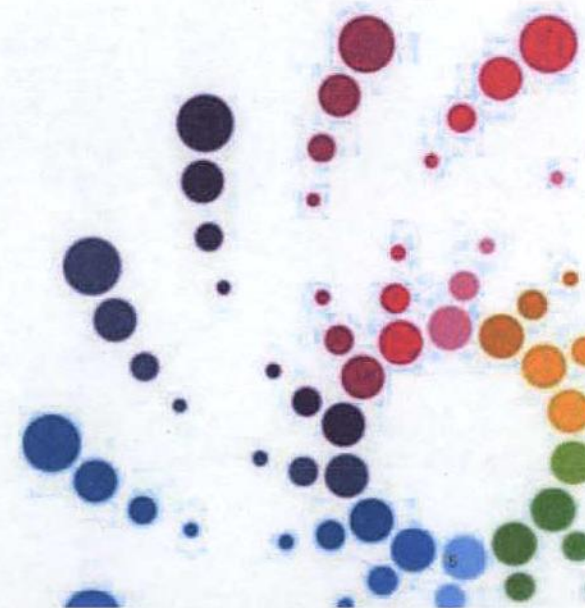
We have reviewed the following documents produced on behalf of the London Borough of Richmond Upon Thames (the "Local Authority"):

- Stag Brewery Site, Mortlake – Justification for Secondary School Proposal
- School Place Planning Strategy 2014 – 2024
- School Place Planning Strategy, February 2018

The "Justification" document and original school place planning 2014 – 2024 have effectively been updated and consolidated into the recently published School Place Planning Strategy, February 2018. Our original analysis on the two legacy documents has now been updated for recent changes reflected in the latest strategy document 2018.

We have set out our work in three key sections:

1. Assessment of accuracy of data and calculations supporting the proposal
2. Assessment of arguments at "borough-level"
3. Assessment of the arguments at "local-level" (being the vicinity of Richmond Park, see the School Place Planning Strategy, page 18)



Summary of findings

Accuracy of the School Place Planning Strategy

We have obtained independent data from local schools and academies in order to verify that the numbers used in the School Place Planning Strategy, February 2018 document are accurate.

These checks are on a sample basis and cover the areas most relevant to Mortlake, but they also provide assurance that the overall document is consistent with independently available data.

Primary data – Year 7 demand

We have been able to obtain Year 6 leaver data for East Sheen Primary, Sheen Mount Primary and Barnes Primary School. We have therefore sought to verify the 2017 data included within the planning document.

Primary Year 6 leavers for these academies, as reported in the Local Authority's planning document are as follows:

Academy	2016	2017	% to state education
East Sheen Primary	60	60	89%*
Sheen Mount Primary	55	60	89%*
Barnes Primary School	55	60	89%*
Total	170	180	

* 89% is a global assumption used for the proportion of pupils retained by state education. It appears to be based on borough-wide data.

Actual data for Year 6 leavers for 2016 and 2017 for these three primaries were as follows:

Academy	2016	2017	% to state education
East Sheen Primary	56	60	75%
Sheen Mount Primary	53	56	52%
Barnes Primary School	59	55	72%
Total	168	171	
Overall (under) / over statement in report	+2	+9	

2017's Year 6 leavers for these three academies were overstated by 5%, if this error was extrapolated across all feeder academies identified in the Mortlake catchment area the total overstatement would be 23 for 2017, rising to 29.6 in 2023. Although the error rate is fairly low, the error rate may equate to a whole form of entry being overstated in 2023 (the final year of the forecast).

We also note that the key table on page 18 of the strategy document, (that calculates the Year 6 leavers for schools local to the Mortlake proposed development) contains the following arithmetical addition errors:

Total year 6 leavers	2017	2018	2019	2020	2021	2022	2023
Reported total leavers	463	463	510	558	562	592	622
Corrected totals	463	463	510	558	562	562	592
(under) / over statement	-	-	-	-	-	+30	+30

Summary of findings

Accuracy of the School Place Planning Strategy (continued)

Of greater significance is the state education retention rate used by the Local Authority to calculate the forecast future demand for state education. A rate of 89% (see below extract from the strategy document) has been adopted as a standard assumption to calculate the future demand for state education:

Year	2017		2018		2019		2020		2021		2022		2023	
	PAN	NoR	PAN	NoR	PAN	NoR	PAN	NoR	PAN	NoR	PAN	NoR	PAN	NoR
Western half	1432	1302	1457	1392	1432	1432	1482	1482	1482	1482	1482	1482	1482	1482
Eastern half	570	550	570	540	570	570	570	570	570	570	570	570	570	570
Total	2002	1852	2027	1932	2002	2002	2052	2052	2052	2052	2052	2052	2052	2052
Year 6 cohort	2067		2169		2343		2428		2556		2550		2542	
88% retention			1932		2062		2137		2249		2244		2237	
Space/shortfall		150		70		-60		-82		-197		-192		-185

The percentage of pupils retained by the state system (88%) appears consistent with the 2017 ratio of "numbers on role in secondary education" divided by the "total Year 6 cohort" ($1,852 / 2,067 = 89.5\%$). The borough-wide shortfall in school places by 2023 has been calculated to be 185 based on this retention rate.

We are not able to verify this number is accurate as all figures are from this report alone, however if we compare the academy data from East Sheen, Sheen Mount and Barnes we see a far lower percentage being retained in the state education system.

The table opposite shows the numbers of 2017 leavers multiplied firstly by the actual state school retention rate as provided by each academy and then secondly by the Local Authority's standard retention rate. The potential (under) / over statement of Year 7 demand is then provided in the far right column.

Academy	2017	2017 leavers to state Year 7	% to state education	2017 leavers to state based on 89%	Possible (under) / over statement of Year 7 demand
East Sheen	60	45	75%	53	+8
Sheen Mount	56	29	52%	50	+21
Barnes	55	40	72%	49	+9
Total	171	114		152	+38

East Sheen, Sheen Mount and Barnes primary may have a higher proportion of pupils that leave to attend private education than other borough primaries, however the comparison remains useful when considering the localised demand for Richmond Park, Christ's and the proposed academy at Mortlake. The broad-brush approach adopted by the Local Authority's assumption has made a significant bearing on the Year 7 demand used as part of these calculations, and there remains a lack of transparency in this regard.

In addition to the inaccuracies and uncertainties raised thus far, there appears to be a lack of transparency regarding the detailed assumptions used for population growth and how this translates to increased pupil numbers. Although the strategy document includes an overview on pages 3 and 4, no firm assumptions or methodology is provided which would assist the reader in understanding the reasonableness or otherwise of projected housing and its effects on pupil place demand.

Summary of findings

Accuracy of the School Place Planning Strategy (continued)

The strategy document sets out the current intake (and therefore current capacity) at Richmond Park, Christ's and Grey Court. We have been able to obtain admissions data from Richmond Park Academy and compare it to the figures used as part of the Local Authority's calculations.

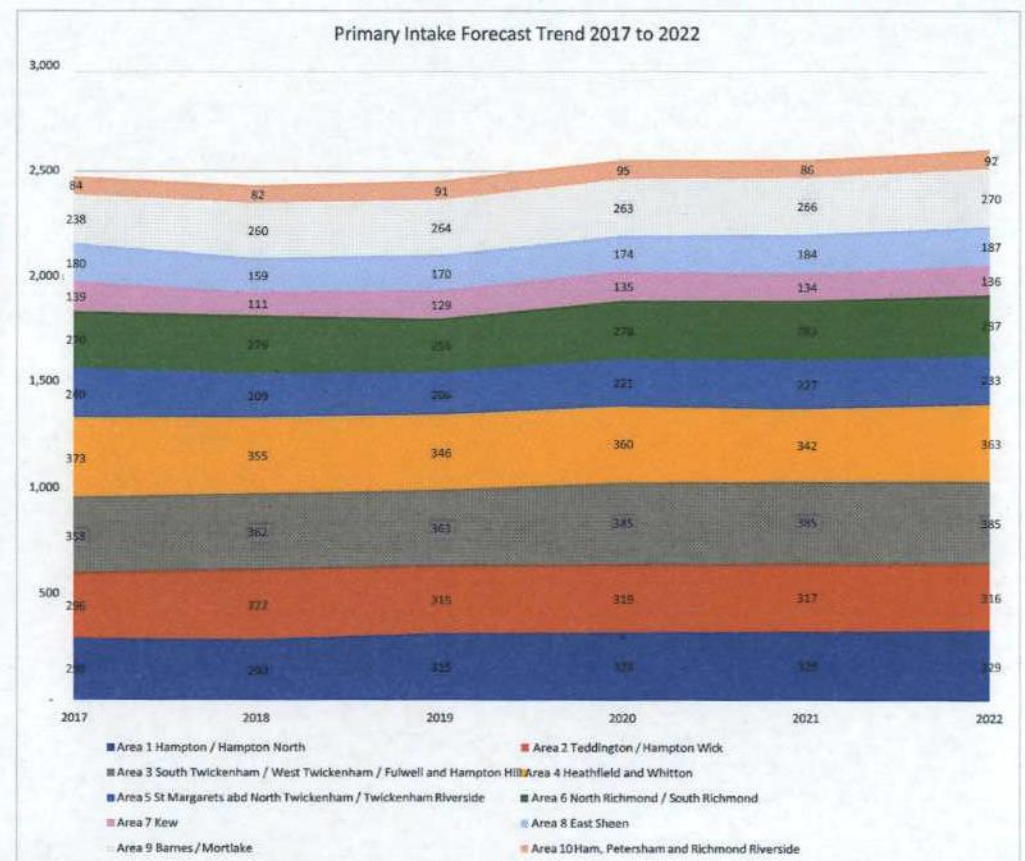
	Academy	NoR 2016	NoR 2017
Admissions per report		166	160
Admissions data from academy (RPA)		164	145

The strategy document therefore infers that there is currently spare capacity of 20 at Richmond Park Academy (180 PAN less 160), but this capacity is actually 35 in 2017.

Longer-term demand from primaries

The overall trend reported does appear to show steady growth in demand for primary places, which will in turn drive the longer-term demand for secondary places. The graph opposite shows the primary forecast intake from 2017 to 2022 by geographical area.

Overall demand is expected to increase from 2,476 in 2017 to 2,598 in 2022 (a modest increase in demand of around 1% per annum).



Summary of findings

The borough-wide argument for the development

Page 16 of the School Place Planning Strategy, February 2018, provides details of the strategy for the secondary phase, and it is this section of the report that provides the key rationale for the proposed development of a new academy on the site of the legacy Mortlake Brewery. At present there are 2,002 secondary school places available at Year 7 as shown in the following table extracted from the report:

School	Published admission number
Christ's (Church of England)	150
Grey Court	240
Hampton High	180
Orleans Park	216
Richmond Park Academy	180
The Richmond upon Thames School	150
St Richard Reynolds Catholic High	150
Teddington	240
Turing House	100
Twickenham	180
Waldegrave School for Girls	216
Total	2,002

The report states that as at September 2017 there were 180 spare places in Year 7 (note that this isn't consistent with the 150 spare spaces indicated by the table in 2017 on page 16 of the report). As at 2023 the capacity is anticipated to increase to 2,052 due to Turing House being established on a new permanent site.

By 2023, the total Year 7 admission cohort is anticipated to be 2,237 (2,542 total year 6 leavers excluding 12% anticipated to attend private schools) which provides a shortfall of 185 school places.

Page 17 of the document states that expansion of Richmond Park, Grey Court and Christ's could yield an additional 90 places (bringing the shortfall to 95), but that this would be insufficient to meet current demand.

Intake of 95 across all years would provide for a total number on roll (NoR) of 475 for a new school. From our extensive experience of finance in the academy sector, it is exceptionally challenging to deliver a broad and balanced curriculum with student numbers lower than 550. If existing schools are not extended a cohort of 185 pupils per year group would result in a sustainable academy with around 925 pupils on roll.

The report is silent on the options for extending other borough schools and assumes that all of the borough's additional shortfall can be met from the Mortlake location. As you will read in the next segment, it appears from the review of available information, that the shortfall in Year 7 places in the local vicinity could potentially be achieved without the need for a new school at Mortlake.

For this academy to be successful it may need to attract pupils from further afield or a significant change in the borough's historical catchment areas would need to occur.

There are 11 other academies in the borough, if six of these academies had capacity to extend PAN by one form of entry the deficit of 185 could be met without the need for this new school.

Summary of findings

The borough-wide argument for the development

(continued)

The primary intake numbers appear to have plateaued, and this is indeed referenced in the strategy document at page 4:

“However, in the short to medium term, demand for primary places has plateaued”

This statement is backed up by the overall primary intake numbers which appear fairly stable between 2017 to 2022. There is therefore no evidence from these numbers, that there will be significant additional growth for borough schools beyond 2023.

Academies are facing budgetary pressures with falling funding rates and inflationary pressures, particularly around staffing and pension costs. It is vital therefore that academies are able to make the most of economy of scale opportunities. It is far more efficient to utilise current administrative and leadership structures to support expansion in existing schools and academies than to create a new school which will duplicate these costs.

The free-school approach would also be much more costly to the tax payer as the school would take time to reach financial sustainability as year groups gradually fill over a 5 year period. If these places were made available in existing schools and academies these inherent inefficiencies would be avoided.

Other areas to note

As part of our review we held discussions with a number of local school and academy representatives, in order to obtain additional information and to confirm our understanding in any areas of uncertainty.

One governor from each of the two local secondary academies, Christ’s School and Richmond Park Academy, agreed to talk to us to discuss their views and to supply background information (both of them being independent of MBCG).

Both Governors believed the development of an additional secondary school was required based on their experience, although they were not in receipt of any reports or other information to support this belief.

Their views are not necessarily representative of the views of the whole organisation they represent.

Summary of findings

The localised argument for the development

The proposal focusses on the primary academies within the vicinity of Richmond Park Academy as driving demand proposed academy at Mortlake. Page 19 of the School Place Planning Strategy includes several key assumptions that are used to conclude that there would be *“400-550 local children competing for 205 local places – the 75 “open” places at Christ’s and the remaining 130 places at Richmond Park”*.

We will look at each key assumption in turn and finally the Local Authority’s conclusion, taking into account issues identified in this report.

Assumption 1: 10-15 Holy Trinity leavers would be likely to obtain “Foundation” places at Christ’s

Christ’s admission policy states that up to 50 foundation places can be offered each year, leaving 100 free places. We understand that this limit is not regularly achieved which may be why the local authority have assumed a lower figure.

Assumption 2: due to their proximity, c 50 Wandsworth Borough children would always be offered places at Richmond Park

We have obtained the admissions data for Richmond Park Academy and the latest two years of data is presented opposite. We have not been able to obtain data from either Grey Court or Christ’s, but if MBCG are able to identify contacts that have access to this information it may better inform the assessment of the Mortlake proposal. Overall 64% of Richmond Park’s intake came from academies identified in the strategy document as providing demand in the local vicinity, 36% coming from academies further afield. The School Place Planning Strategy includes an assumption that around 50 Richmond Park places are taken from Wandsworth Borough and other out of area pupils; the data obtained appears to support this statement.

School	2016	2017
Abroad	6	0
All Saints, Putney	4	3
Allfarthing	2	0
Barnes	22	16
Darell	5	3
East Sheen	20	28
Granard	8	4
Heathfield	2	1
Heathmere	2	2
Holy Trinity	14	19
Hotham	6	10
Kew Riverside	3	2
Lowther	20	20
Marshgate	3	2
Other	11	7
Roehampton CE	5	3
Ronald Ross	3	1
Sacred Heart Roehampton	8	12
Sheen Mount	4	3
Southmead	0	2
St Faiths	3	3
St Mary Mags	0	1
St Osmunds	4	0
The Alton	9	3
Totals	164	145
Academies in the Mortlake vicinity	91	93
% of total	55%	64%

Summary of findings

The localised argument for the development (continued)

Assumption 3: The increasing numbers of secondary school places in Houslow Borough will be filled by increased demand from children attending Houslow primary schools

We have reviewed the Houslow School Places Strategy, published December 2016 and note the following key points:

“Over a quarter of the intake at age 11 comes from outside Hounslow itself (800 out of total of 3,000)”

Although this statement appears to contradict the Local Authority’s assumption the strategy document goes on to state the following:

“Overall capacity in 2016 shows a shortfall of -107 (census to confirm) across LA for year 7. Most other years in the secondary phase have surplus places”

“The increased demand for primary places seen over the last 8 years is now emerging in secondary schools, moving from the previous challenge of surplus places to one of shortfall through to 2023”

“Beyond 2016 we are now seeing a shortfall year on year which will reach the first peak in 2019, resulting in the need for 19FE against planned capacity of 2,907 in 2016 followed by a further 7FE projected by 2023”

It is not clear from the document if the latest investments in secondary school places in Houslow take account of out-of-borough intake or if Houslow schools will only be able to meet local demand going forward.

Assumption 4: There will always be a certain percentage of increased numbers of children entering private sector schools at Year 7

The document is not clear as to the exact assumptions that have been made in this regard. 89% has been used to formulate the borough-wide shortfall of school places of 185 at 2023 (page 16), but the final conclusion at page 19 (which appears to focus on the localised arguments in support of the Mortlake development), includes no additional detail as to how assumptions have been included in supporting calculations.

Work we have undertaken to verify state-sector retention rates to East Sheen, Sheen Mount and Barnes primary schools suggests a much lower retention rate and therefore potentially over-estimated future demand for Year 7 places in the area (see page 7 of this report).

Assumption 5: Whilst parents could also apply for places at Grey Court, they would be competing with parents of children living much nearer and they would be highly unlikely to be successful

We have data from East Sheen, Sheen Mount and Barnes primary schools detailing the destination of Year 6 leavers.

In 2016 and 2017 a total of 26 pupils left these three primaries to attend Grey Court. In 2017 6% of leavers from East Sheen, Sheen Mount and Barnes primary schools joined Grey Court. Although this is a small percentage if this was representative across all academies in the Mortlake vicinity, Grey Court would provide 28 places to local children, representing almost a whole form of entry.

Summary of findings

The localised argument for the development (continued)

Local Authority's conclusion: Effectively, then, there would be 400–550 local children competing for 205 local places – the 75 'Open' places at Christ's and the remaining 130 places at Richmond Park Academy – so the Council would be unable to meet its statutory duty to provide places for those children unless a new school were provided

The first point to note is that there are no supporting calculations or any other disclosures in support of this statement. The table at page 18 of the School Place Planning Strategy sets out the demand for Year 7 places from 2015 to 2023. Due to arithmetical errors (see page 6 of this report) we have reproduced a corrected table below:

	2015	2016	2017	2018	2019	2020	2021	2022	2023
Barnes	58	55	60	60	60	90	60	60	60
Darrell	24	24	43	43	60	60	60	60	60
East Sheen	57	60	60	60	90	60	90	90	90
Holy Trinity	51	59	60	90	60	60	60	60	60
Kew Riverside	28	26	30	30	30	30	30	30	30
Lowther	47	43	60	60	60	60	60	60	60
Marshgate	54	88	90	60	60	90	60	60	90
Sheen Mount	54	55	60	60	90	60	90	90	90
Thomson House	0	0	0	0	0	48	52	52	52
Total	373	410	463	463	510	558	562	562	592

Academies providing demand for the proposed Mortlake academy development have been defined by the School Place Planning Strategy as: "nine non-Catholic primary schools within Richmond Park Academy's vicinity" (see page 18 of the strategy document)

In order to arrive at a figure of "400 to 550 local Year 7 pupils competing for 205 places", we assume the Local Authority have taken the overall local Year 6 leavers and applied the 89% retention assumption. This would arrive at a figure of 412 Year 7s at 2018 and 527 by 2023 (or 553 if based on the miscalculated 2023 total of 622).

If this is indeed the method of calculation, there appears to be fundamental flaw in this argument. Using the pupil data of East Sheen, Sheen Mount and Barnes primary schools we can see that a total of 69 pupils left these academies in 2017 and went onto attend Christ's or Richmond Park out of a total of 171 Year 6 leavers; this equates to 40% of the total leavers. The Local Authority appear to have assumed all retained pupils will directly affect demand at Richmond Park and Christ's which has not historically been the case.

An alternative interpretation based on the available information

Having reviewed the available information, our alternative interpretation of the data is as follows:

2017 Year 6 leavers stand at 463. Currently this is met by local academies and Richmond Park has spare capacity of 35 (145 pupils against a PAN of 180). By 2023 the total number of Year 6 leavers is set to increase by 129 (592 less 463).

The strategy document states at page 17 that it maybe feasible for Grey Court, Christ's and Richmond Park to extend provision by one form of entry each, extending supply of Year 7 places by 90; add to this the existing space capacity of 35 at Richmond Park and the total additional capacity totals 125, a figure just 4 short of the estimated demand increase to 2023.

If this is the case there would be no requirement for an additional academy in this location.

Appendix I

"Further Questions for the Local Authority"



3. Further questions



No.	Issue to be addressed	Recommendation
1.	<p>The report is silent on the options for extending other borough schools and assumes that all of the borough's additional shortfall can be met from the Mortlake location. Our report has identified potential issues with respect to demand for this academy in the local catchment area (as identified by page 18 of the School Place Planning Strategy, February 2018 – "nine non- Catholic primary schools within Richmond Park Academy's vicinity"). Therefore, for this academy to be successful it may need to attract pupils from further afield or a significant change in catchment areas may need to occur.</p> <p>There are 11 other academies in the borough, if six of these academies had capacity to extend PAN by one form of entry the deficit of 185 could be met without the need for this new school.</p> <p>Academies are facing budgetary pressures with falling funding rates and inflationary pressures, particularly around staffing and pension costs. It is vital therefore that academies are able to make the most of economy of scale opportunities. It is far more efficient to utilise current administrative and leadership structures to support expansion in existing schools and academies than to create a new school which will duplicate these costs.</p> <p>The free-school approach would also be much more costly to the tax payer as the school would take time to reach financial sustainability as year groups gradually fill over a 5 year period. If these places were made available in existing schools and academies these inherent inefficiencies would be avoided.</p>	<p>We recommend that the Local Authority provide details of which secondary academies across the borough could potentially be extended by a form of entry. The document focusses on Grey Court, Christ's and Richmond Park Academy and states extension may be feasible here (of up to 90 places) but makes no mention of other academies and schools from across the borough.</p> <p>MBCG may wish to consider consulting with all borough secondary schools to provide an independent view as to whether this may be feasible.</p>
2.	<p>There appear to be a number of inaccuracies in the Local Authority's numbers used as part of the School Place Planning Strategy, February 2018:</p> <ul style="list-style-type: none"> • The table at page 18 contains arithmetical errors that overstate the demand for Year 7 places by 30 for 2022 and 2023 (an entire form of entry). See page 6 of this report for further detail. • We are in receipt of Year 6 leaver information from East Sheen, Sheen Mount and Barnes primary schools. The leaver figures for 2016 and 2017 do not agree to the figures used to calculate potential local demand (page 18 of School Place Planning Strategy, February 2018). See the page 6 of this report for details of these differences. • The strategy document therefore infers that there is currently spare capacity of 20 at Richmond Park Academy (180 PAN less 160), but this capacity is actually 35 in 2017. See page 8 of this report for further detail. 	<p>We recommend the Local Authority review the issues noted opposite and prepare new forecasts taking account of these errors / potential inaccuracies.</p>

3. Further questions



No.	Issue to be addressed	Recommendation
3.	<p>The document is not clear as to the exact assumptions that have been made with respect to the proportion of children staying in state-sector education rather than attending independent schools (the “retention rate”). A retention rate of 89% has been used to formulate the borough-wide shortfall of school places of 185 at 2023 (page 16 of the School Place Planning Strategy), but the final conclusion at page 19 (which appears to focus on the localised arguments in support of the Mortlake development) includes no additional detail as to how assumptions have been included in supporting calculations.</p> <p>If we compare the Year 6 leavers data from East Sheen, Sheen Mount and Barnes we see a far lower percentage being retained in the state education system (East Sheen 75%, Sheen Mount 52% and Barnes 72%). We do however understand that these three academies are likely to have higher than average proportions of pupils leaving for private education.</p> <p>The broad-brush approach adopted by the Local Authority’s assumptions has made a significant bearing on the Year 7 demand used as part of these calculations. If we compare the actual retention rates to the 89% standard assumption, across just these three schools the overall demand has been potentially overstated by more than a standard form of entry per annum (38 places based on 2017 data).</p>	<p>We recommend that MBCG consider requesting more detailed data from the Local Authority detailing the proportions of pupils retained in state education by school.</p> <p>This is required in order to ensure that the 89% used throughout the Authority’s calculations remains accurate for the Mortlake Brewery’s key feeder primary schools.</p>
4.	<p>There appears to be a lack of transparency regarding the detailed assumptions used for population growth and how this translates to increased pupil numbers.</p> <p>Although the strategy document includes an overview on pages 3 and 4, no firm assumptions or methodology is provided which would assist the reader in understanding the reasonableness or otherwise of projected housing growth and its effects on pupil place demand.</p>	<p>We recommend MBCG requests further detail behind the assumptions used to calculate future demand for primary and secondary school places.</p>
5.	<p>It is not clear from the document if the latest investments in secondary school places in Houslow take account of out-of-borough intake, or if Houslow schools will only be able to meet local demand going forward.</p> <p>Houslow are making significant investments in secondary places and it is of paramount importance that local authorities don’t duplicate the supply of school places. There is a lack of transparency currently in this area and from comments made in the report it is not clear that full and informed liaison with neighbouring London boroughs has taken place.</p>	<p>We recommend that MBCG approach Richmond and Houslow local authorities to seek clarity regarding the forecast capacity in Houslow for Richmond Borough Year 7 pupils (and vice versa).</p> <p>Furthermore, we recommend that MBCG makes necessary enquires at Local Authority level to establish the actual level of communication and liaison between neighbouring London boroughs in arriving at their respective school place strategies.</p>

3. Further questions



No.	Issue to be addressed	Recommendation
6.	<p>Grey Court has been discounted as supplying school places for primary schools in the vicinity of the proposed Mortlake development (see the School Place Planning Strategy, February 2018, page 19, 5th bullet point).</p> <p>We have data from East Sheen, Sheen Mount and Barnes primary schools. In 2016 and 2017 a total of 26 pupils left these three primaries to attend Grey Court. In 2017 6% of leavers from East Sheen, Sheen Mount and Barnes primary schools joined Grey Court. Although this is a small percentage if this was representative across all local academies, Grey Court would provide 28 places to children in the vicinity of Mortlake, representing almost a whole form of entry.</p>	<p>We recommend that MBCG approach the Local Authority regarding this issue. Projections should take account of historical trends and more transparency should be provided as to the Local Authority's assumptions as they're currently inconsistent with independently sourced pupil data.</p>
7.	<p>There are no supporting calculations or any other disclosures in support of the final conclusion, that between 400 and 550 children would be competing for 205 local places.</p> <p>In order to arrive at a figure of 400 to 550 local Year 7 pupils competing for 205 places, we assume the Local Authority have taken the overall local Year 6 leavers and applied a standard 89% retention assumption (to account for pupils attending private schools). This would arrive at a figure of 453 Year 7s at 2019 and 527 by 2023 (or 553 if based on the miscalculated 2023 total of 622).</p> <p>If this is indeed the method of calculation, there appears to be a fundamental flaw in this conclusion. Using the pupil data of East Sheen, Sheen Mount and Barnes primary schools we can see that a total of 69 pupils left these academies in 2017 and went on to attend Christ's or Richmond Park out of a total of 171 Year 6 leavers; this equates to 40% of the total leavers. The Local Authority appear to have assumed all retained pupils will affect demand at Richmond Park and Christ's which has not historically been the case.</p>	<p>We recommend the Local Authority provide transparency as to the data set used, assumptions and calculations supporting their conclusions.</p>
8.	<p>Having reviewed the available information, our closest assessment is as follows:</p> <ul style="list-style-type: none"> • 2017 Year 6 leavers stands at 463. Currently this is met by local academies and Richmond Park has spare capacity of 35 (145 pupils against a PAN of 180). By 2023 the total number of Year 6 leavers is set to increase by 129 (592 less 463). • The strategy document states at page 17 that it may be feasible for Grey Court, Christ's and Richmond Park to extend provision by one form of entry each, extending supply of Year 7 places by 90; add to this the existing space capacity of 35 at Richmond Park and the total additional capacity totals 125, a figure just 4 short of the estimated demand increase to 2023. • Only modest growth of 1% per annum is anticipated post 2023 according to primary projections included in the strategy document. 	<p>We recommend MBCG approach the Local Authority and provide them with the calculations and assumptions provided opposite to obtain their comment.</p>

