

**FLOOD RISK SEQUENTIAL AND
EXCEPTION TEST**

**KNELLER HALL, 65 KNELLER ROAD,
TWICKENHAM, TW2 7DN**

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APPENDICES

APPENDIX 1 – SEQUENTIAL TEST

Revision	Description	Originated	Checked	Reviewed	Authorised	Date
01	Final	JS	EP	EP	EP	22/09/32
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1.0 INTRODUCTION AND PURPOSE

1.1 This report accompanies a planning application on behalf of Dukes Education and Radnor House School Limited (the Applicant) to London Borough of Richmond upon Thames (LBR). The planning application is for development at Kneller Hall, 65 Kneller Road, Twickenham, TW2 7DN (the Site).

1.2 The 'Proposed Development' comprises of:

“The demolition of existing modern buildings on the site and the conversion of Kneller Hall and other ancillary buildings associated with the royal military music school to a day school (Use Class F1), together with the construction of associated new purpose-built buildings including teaching space, indoor sports facilities and sporting pavilion, and other ancillary works including landscaping, access and energy centre.

Internal and external alterations to Kneller Hall and the curtilage listed buildings to facilitate the day school use, including demolition and rebuilding of single storey extension to the west wing of Kneller, extension to the Band Practice Hall and re-opening of Whitton Dene site entrance.”

1.3 The purpose of this document is to demonstrate that the Site complies with the Sequential and Exception Test for flood risk in accordance with the requirements of the National Planning Policy Framework (NPPF) (2021) and the accompanying Technical Guidance (TG).

1.4 The report should be read in conjunction with the submitted RPS Flood Risk Assessment, dated September 2022 and the Drainage Strategy and Maintenance Plan including Foul Water Drainage Strategy prepared by AKS Ward, dated September 2022.

2.0 SITE DESCRIPTION AND PROPOSED DEVELOPMENT

The Site

- 2.1 The Kneller Hall site is located in Twickenham, West London within the London Borough of Richmond upon Thames (LBR).
- 2.2 The Site was formerly occupied by the Royal Military School of Music which included residential accommodation (Use Class C2). The site was owned by the Ministry of Defence (MoD). It was sold and vacated by the MOD in the summer of 2021. The Site has now been acquired by Dukes Education.
- 2.3 The Site extends to approximately 9.7 hectares.
- 2.4 The Site is accessed by road via Kneller Road, a 'Local distributor road' (Kneller Road/Warren Road) which provides access to Chertsey Road (A316), which links Richmond to Central London via Hammersmith and the M3 to the west.
- 2.5 Buildings are largely located in the western two thirds of the Site. Kneller Hall (Grade II Listed) is the most prominent building, with a range of other buildings within the Site, which vary in scale (1-4 storeys). The Guards House and Band Practice Hall are curtilage listed. Some of the existing buildings are located within the part of the Site that is allocated as Metropolitan Open Land. The buildings are all set within a wider context of parking and circulation areas, green spaces and sports facilities.
- 2.6 The overarching landscape typology of the eastern part of the Site is a parkland setting, comprising a large number of trees across the Site. Many of the trees are mature and protected by a Tree Preservation Order. The western part of the Site contains a large amount of hardstanding and car parking. The eastern part of the Site is within Metropolitan Open Land (MOL), largely comprising grassed fields, playing fields, with some sports pitches, buildings and structures.
- 2.7 In addition to the aforementioned partial MOL allocation, the Site has its own LBRuT Local Plan (July 2018) policy, Policy SA 14 Kneller Hall, Whitton. The Site also has its own Supplementary Planning Document (SPD), titled the Kneller Hall Masterplan SPD (March 2020).
- 2.8 The Site has a secure boundary, comprising a combination of walls and fencing. The four gate piers along the boundary wall are also designated Grade II Listed. The boundary to the Site (including the listed wall) varies considerably in quality and style. The Site is located within the LBRuT's Whitton Archaeological Priority Area.

- 2.9 The Site is not located within a Conservation Area. The closest Conservation Area is Rosecroft Gardens, which is located approximately 300m to the south and separated by the A316 and residential roads.
- 2.10 The Site is within Flood Zone 1, and therefore at low risk of fluvial flooding. It is however understood that parts of the Site are at risk of surface water flooding (high, medium and low), the entire site at risk of groundwater flooding and the Site is within a Critical Drainage Area. Further details on this can be reviewed within the submitted Flood Risk Assessment.

Site Context

- 2.11 The prevailing character of the area surrounding the Site is residential, with the predominant typology being suburban, semi-detached, and detached housing accompanied by generous front and rear gardens all within a green setting. Neighbouring buildings in the immediate surrounds are modest in height, with the majority at a scale of two-storeys along the northern, southern, and western boundaries of the Site. The residential flats to the east of the Site boundary are three storeys in height.
- 2.12 The Site is not within a town centre but is located approximately 700 metres (8-minute walk) from Whitton district centre and a 20-minute walk from Twickenham district centre. It is also situated directly west of Twickenham Stadium and the northern part of the Site neighbours Whitton Tennis Club.

Proposed Development

- 2.13 The Proposed Development comprises of:

“The demolition of existing modern buildings on the site and the conversion of Kneller Hall and other ancillary buildings associated with the royal military music school to a day school (Use Class F1), together with the construction of associated new purpose-built buildings including teaching space, indoor sports facilities and sporting pavilion, and other ancillary works including landscaping, access and energy centre.

Internal and external alterations to Kneller Hall and the curtilage listed buildings to facilitate the day school use, including demolition and rebuilding of single storey extension to the west wing of Kneller, extension to the Band Practice Hall and re-opening of Whitton Dene site entrance.”

Site Suitability and Site Search Area

About Dukes Education

- 2.14 Dukes Education is a family of UK nurseries, schools and colleges united by a common purpose; to give children the foundations for an extraordinary life through education. Founded in 2015 by its chairman Aatif Hassan, Dukes Education has 23 schools and colleges, and 20 nurseries, with sites across London, Cambridge, Kent, and Cardiff.
- 2.15 Dukes Education also owns and runs wraparound advisory services and summer schools at each stage of the education journey, from academic summer schools to university application consultancy services. Dukes is a dynamic, future-focused organisation committed to providing a gold standard of education for young people in the UK.
- 2.16 Dukes have significant experience operating schools and as such are considered to be well qualified on what criteria need to be met to provide a suitable site for an education facility.

About Radnor House

- 2.17 Radnor House is part of the Dukes Education Group. Radnor House is an independent selective co-educational day school currently located at Pope's Villa, Cross Deep, Twickenham, London, TW1 4QG. Radnor House pupils learn in small classes with a strong focus on individual attention. The school educates girls and boys from ages 9 (Year 5) to 18 (sixth form), with three main entry points in Year 5, Year 7 and Year 12.
- 2.18 The school is currently at full capacity in most year groups and have a waiting list for spaces. The school's Department for Education capacity is 440 pupils. The school wishes to expand to enable it to improve the facilities that it provides to existing students and also to further grow the school.
- 2.19 The school has a shortage of space and is unable to provide bespoke facilities to serve specific age groups. Due to a lack of space, they are also restricted in the curriculum that they can offer. Pupils at the school currently utilise off site facilities for sport due to a lack of available space on the site. The school currently employs approximately 100 staff (circa 60 teaching staff and circa 40 support staff).
- 2.20 The school has advised that the majority of pupils within a 60-minute journey time of the existing Pope's Villa site. The school expects to continue to have a broadly similar catchment area when they operate from Kneller Hall.

Requirement for Additional Site

- 2.21 The school needs additional space to ensure that it can continue to provide a high standard of education for its current pupils and so that it can provide a more diverse curriculum with a wide range of facilities. The school has a waiting list and has identified that there is demand for additional school places.
- 2.22 Dukes Education has been searching for a suitable additional property in the local area for a number of years. Notably, a pre-application was submitted in December 2020 at St George House, 76 Crown Road, Twickenham (Ref. 20/P0295/PREAPP). However, the loss of employment was not supported by the Council and the possible purchase of the site fell through.
- 2.23 Kneller Hall was identified earlier this year by Dukes Education and they have subsequently acquired the freehold interest in the Site from the MOD. Dukes Education and Radnor House School are very excited about this acquisition and the school that they can deliver at Kneller Hall.
- 2.24 It is proposed that all pupils in Years 7 to 11 and in the sixth form who are currently located at Pope's Villa, will be relocated to Kneller Hall. There will also be room for further growth at Kneller Hall, with additional forms being introduced each year. It is expected that the Kneller Hall site will have capacity for up to a total of 1,000 pupils.
- 2.25 Pope's Villa will then solely be used for Year 5 and 6 pupils.

Sequential Search Criteria

- 2.26 Given the need to accommodate a significant number of pupils, key criteria when identifying a suitable site include:
- Vehicle accessibility – vehicles need to be able to access the site to avoid issues on local road networks.
 - Good road connections to ensure accessibility for pupils and staff, particularly by public transport.
 - Proximity to urban areas where there is a high demand for school places.
 - Ability to accommodate large school buildings and associated facilities including the sports facilities, i.e. sports halls and outside playing pitches.
 - The Kneller Hall site is 9.7ha, however a search area of 5ha is proposed to account for the potential on an alternative site to potentially deliver a more consolidated built

footprint or greater development height and to reflect for the need for the Proposed Development site to retain Metropolitan Open Land.

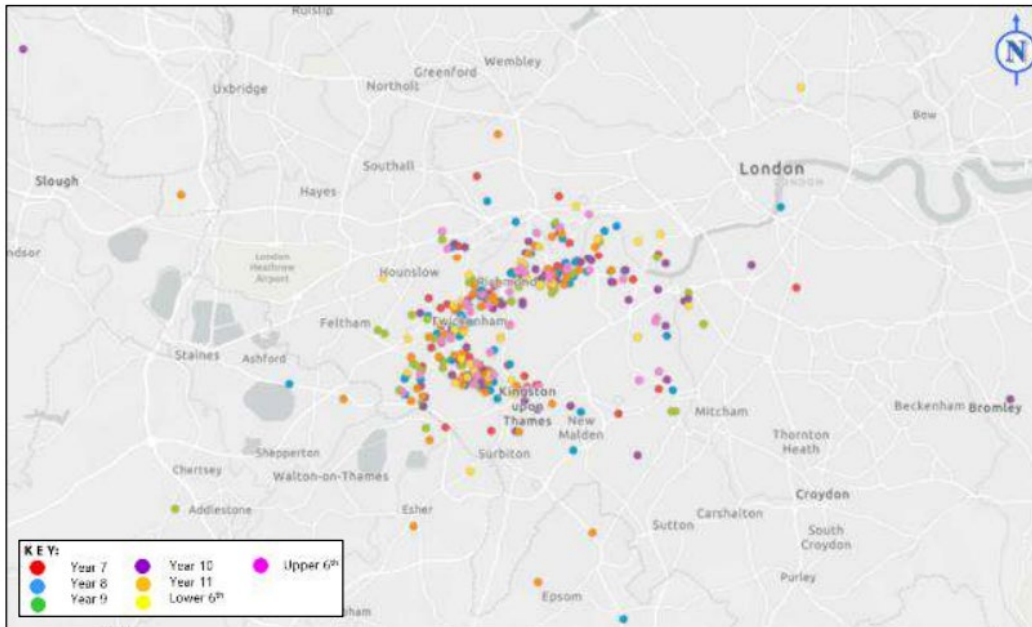
- The Proposed Development proposes a total of 13,757 sqm/ 148,000 sqft of floorspace. This floorspace is required to meet the Department for Education requirements for a 1,000 person senior school. To ensure a robust assessment, we have included in our assessment sites with at least 100,000 sqft of floorspace, or capacity to delivery 100,000 sqft of floorspace has been considered.

2.27 Urban areas are able to accommodate multiple education establishments, with different schools meeting different demand and pupil/ parent requirements. Private senior schools tend to serve a wider catchment area than state schools.

2.28 The Proposed Development seeks to provide a senior school with capacity for up to 1,000 pupils. When the school initially opens in September 2023, the existing pupils from Year 7 upwards based at Radnor House will move across to the Kneller Hall site. This is a total of approximately 410 pupils. The new site therefore needs to continue to be accessible for existing pupils at Radnor House School, to ensure that they can travel to the new site. Radnor House School has also established relationships with local sports organisations, that operate in LBR, and it intends to retain these links when the school relocates, as these organisations assist in providing pupils with sporting opportunities. This is a further reason why the school could not relocate too far from the existing site.

2.29 Kneller Hall is 1.5km as the crow flies from Radnor House School. This location is considered to be suitable to enable existing pupils to move across and to continue at the school.

2.30 Within Section 3.21 of the submitted Transport Assessment it is identified that a notable number of pupils live within 20 minutes walk of Kneller Hall, and a high proportion are within 20 minutes cycling distance. Maps of the isochrones are shown below.



2.31 **Figure 1: Existing 2021/22 Pupil Cohort at Radnor House School (Years 7-13).** Taken from **Transport Assessment.**

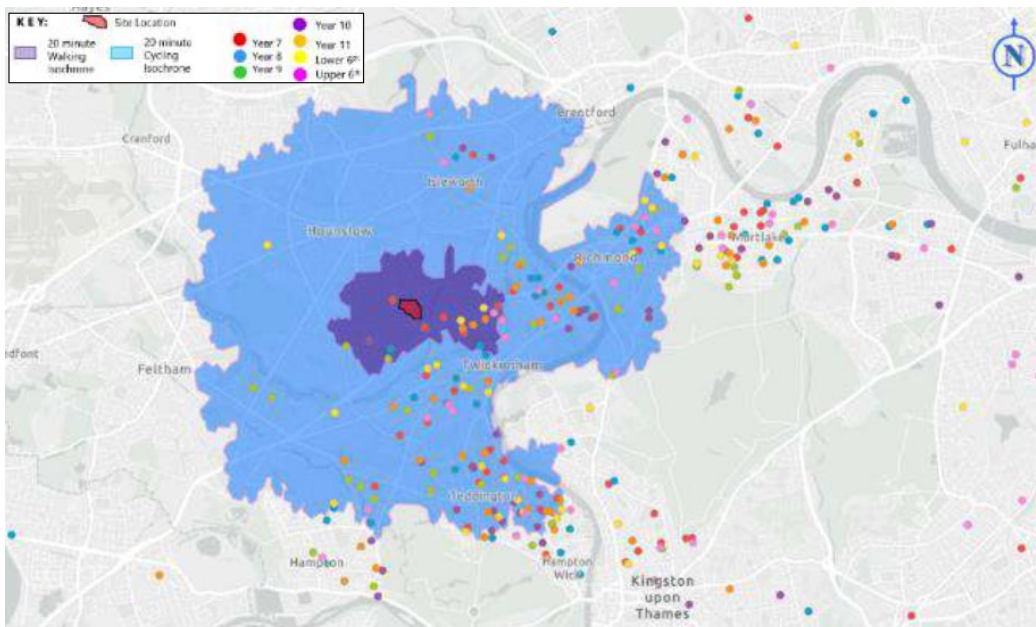


Figure 2: Existing 2021/22 Pupil Cohort in Context of Kneller Hall and Walking and Cycling Isochrones. Taken from Transport Assessment.

- 2.32 From the above maps it is clear that the majority of existing pupils live within the LBR. The 20 minute walking (shown in purple) and cycling (shown in blue) isochrones at Figure 2, show that pupils could reasonably be expected to live and travel from across the majority of LBR and neighbouring London Borough of Hounslow (LBR) and to reach the Site using a sustainable mode of transport in 20 minutes.
- 2.33 It would therefore be reasonable for the new school site to be located elsewhere in the Borough, or in parts of LBH and to continue to serve a similar catchment area.
- 2.34 The school wishes to remain in the LBR, due to the existing links it has built and the catchment area that it serves. However, in order to be robust in the Sequential Test assessment, a full search of land within both LBR and LBR has been undertaken (see Figure 3 map).



Figure 3: London Borough Map showing Hounslow and Richmond Search Area (Kneller Hall shown as red dot)

3.0 LOCAL POLICY AND NPPF

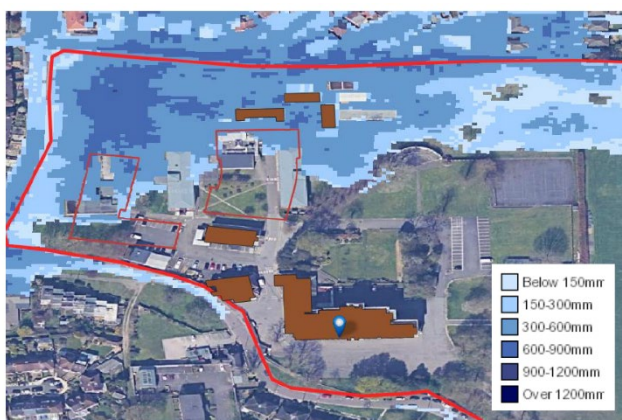
3.1 The Site falls within London Borough of Richmond upon Thames (LBR) and the search area also encompasses land within the London Borough of Hounslow (LBH).

Local Plan - LBR

3.2 The currently adopted Development Plan Documents for the LBR is the Local Plan (2018) and the London Plan (2021). As of December 2021, consultation started on the Council's Pre-Publication (Regulation 18) Draft Local Plan. This includes an updated site allocation for Keller Hall. A full assessment of Planning Policies can be found within the submitted Planning Statement.

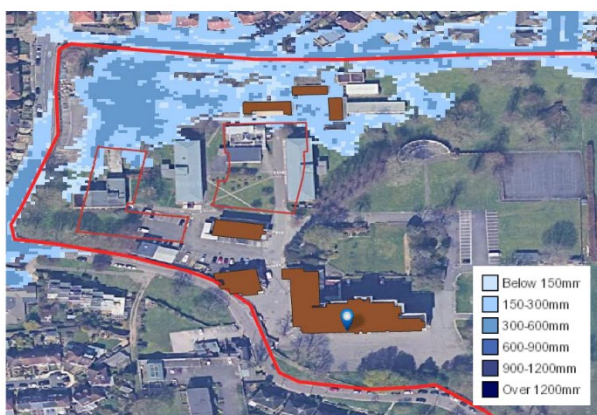
3.3 The eastern portion of the Site is allocated as Metropolitan Open Land and an area poorly provided with Public Open Space. The Site is also located in LBR's Whitton Archaeological Priority Area. The Site is located in Flood Zone 1 for fluvial flooding, however, parts of the site are at risk of surface water flooding (high, medium and low), the entire site is at risk of groundwater flooding and the site is within a Critical Drainage Area.

3.4 The Flood Risk Assessment, prepared by RPS, submitted with the planning application shows the relationship between the proposed new build development and the surface water flood risk area.



<https://environment.data.gov.uk/spatialdata/risk-of-flooding-from-surface-water-depth-0-1-percent-annual-chance/wms>.

Figure 4: Flood Map for Surface Water (Flood Depth for the 1 in 1000 Scenario). Taken from Flood Risk Assessment.



<https://environment.data.gov.uk/spatialdata/risk-of-flooding-from-surface-water-depth-0-1-percent-annual-chance/wms>.

Figure 5: Flood Map for Surface Water (Flood Depth for the 1 in 100 Scenario)

3.5 Local Plan Policy LP21 'Flood Risk and Sustainable Drainage' seeks to avoid or minimise the impact development has on all sources of flooding. It advises that for developments in Flood Zone 1, a sequential and exception test is not required. A Flood Risk Assessment is required, for sites where there is evidence of a risk from other sources of flooding.

3.6 Paragraph 6.2.2 of the adopted Local Plan states that:

"6.2.2 Future development in Zone 3a and Zone 2 will only be considered if the 'Sequential Test' has been applied in accordance with national policy and guidance. However, there will be some exceptions to this. The Sequential Test will not be required if it is not a major development (2) and at least one of the following applies:

- It is a Local Plan proposal site that has already been sequentially tested, unless the use of the site being proposed is not in accordance with the allocations in the Local Plan.*
- It is within a main centre boundary as identified within this Local Plan (Richmond, Twickenham, Teddington, Whitton and East Sheen).*
- It is for residential development or a mixed use scheme and within the 400 metre buffer area identified within the Plan or surrounding the centres referred to above.*
- Redevelopment of an existing single residential property.*
- Conversions and change of use.*

6.2.3 The Sequential Test will be required in all other cases.

6.2.4 The Council's bespoke approach to the Sequential Test recognises that relocating development from and around these centres (400 metres is considered to be walking distance from the centres)

is not a realistic option and in order to sustain the continuing role of these centres, development can be used as a way to help manage and reduce flood risk in these areas.”

3.7 The more recently adopted Strategic Flood Risk Assessment (SFRA) Level 1 Update (Updated 2020 with further minor updates in March 2021) advises that:

“The Sequential Test only needs to be applied for development proposals in Flood Zone 1 if the SFRA and accompanying Web Map indicates there may be existing flood issues from other sources”

3.8 The site is susceptible to surface and groundwater flooding and this therefore triggers a requirement for a Sequential Test.

3.9 The SFRA at 6.2 advises that

“Many of the borough’s properties are located in and around town centres and local centres. Some centres are located in Flood Zones 2 and 3, however relocating development away from these centres and their immediate surrounding vicinity is not always a realistic option due to the community role these areas play in the borough. In order to sustain the continuing role of these centres, development can be used as a way to help manage and reduce flood risk in these areas. Therefore, an EA approved local Sequential Test approach has been developed.

The local Sequential Test approach is applicable for town centres, local centres, and areas that fall within the 800m buffer boundary for each centre. An 800m buffer was selected as it is considered a community sustaining walking distance for a person not living with/having a physical disability. The Policy Web Map provides the location of the designated centres and their 800m buffers.

3.10 *The local approach dictates that the Sequential Test will not be required if the development proposal meets at least one of the following:*

- *It is within a town centre or local centre boundary.*
- *It is for residential development or a mixed-use scheme and within the 800m buffer area identified within the town centre or local centre.”*

3.11 The Site is situation within the 800m buffer of Whitton Town Centre. The site’s southern boundary is 385m from Whitton and the northern boundary is 495m – 550m from Whitton Town Centre.

3.12 However, despite this SFRA, the Council’s webpage was subsequently updated to clarify *“that whilst the SFRA introduces a Sequential Test approach based on an 800 metre buffer area for town and local centres, applicants need to follow Policy LP 21 of the existing adopted Local Plan (2018), specifically paragraph 6.2.2”*. This therefore results in a Sequential Test being required.

3.13 Part C of Policy LP21 Part C states that *“The Council will require the use of Sustainable Drainage Systems (SuDS) in all development proposals. Applicants will have to demonstrate that their proposal complies with the following:*

- *A reduction in surface water discharge to greenfield run-off rates wherever feasible.*
- *Where greenfield run-off rates are not feasible, this will need to be demonstrated by the applicant, and in such instances, the minimum requirement is to achieve at least a 50% attenuation of the site's surface water runoff at peak times based on the levels existing prior to the development.”*

3.14 The above Local Plan policy is supported by The London Plan Policies SI12 ‘Flood Risk Management’ and SI13 ‘Sustainable Drainage’ which collectively aim to minimise the risk of flooding and reduce the rate and volume of surface water run-off close to greenfield run-off rates.

NPPF

3.15 Paragraph 95 of the NPPF (2021) states that

“It is important that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education.”

3.16 Regarding flood risk, the Sequential Approach is outlined in the NPPF (paragraphs 161-166) and aims to ensure preference is given to the development of land within Flood Zone 1 prior to Zones 2 and 3. It also ensures that flood vulnerability of the development proposals is taken into consideration when locating development in Flood Zones 2 and 3.

3.17 In order to meet the requirements of the Sequential Test, it must be demonstrated that there are no 'reasonably available' sites within a lower probability of flooding that would be appropriate for the type of development proposed.

3.18 Where the Sequential Approach shows that it is not possible to locate development in zones of lower flood risk due to other wider sustainability issues; it may be possible to justify, using the Exception test, that development is still feasible by the management of flood risk.

3.19 The proposed scheme comprises the development of an educational establishment. Annex 3 of the NPPF states that ‘More Vulnerable’ uses include *“Non-residential uses for health services, nurseries and educational establishments.”*

3.20 With reference to Table 2 of the NPPF TG, More Vulnerable development is only appropriate within Flood Zones 1 and 2; with Zone 3a it requires an Exception Test and 3b would be inappropriate.

Flood Zones	Flood Risk Vulnerability Classification				
	Essential infrastructure	Highly vulnerable	More vulnerable	Less vulnerable	Water compatible
Zone 1	✓	✓	✓	✓	✓
Zone 2	✓	Exception Test required	✓	✓	✓
Zone 3a †	Exception Test required †	x	Exception Test required	✓	✓
Zone 3b *	Exception Test required *	x	x	x	✓*

Key:

✓ Development is appropriate

x Development should not be permitted.

Copy of Table 2: Flood risk vulnerability and flood zone ‘compatibility’, NPPF TG

3.21 For fluvial flooding the Site falls within Flood Zone 1 and is therefore is appropriate for development. Regardless, as the site has elements of surface water flood risk and groundwater flood risk, a sequential assessment is required to be provided.

Pre-Application Feedback

3.22 As part of pre-application engagement, it was confirmed by the Council in formal feedback (dated 25th August) that *“The application site is located within Flood Zone 1 and is at risk or both surface water flooding and groundwater flooding. In line with policy LP21 and the SFRA, a sequential test is therefore required.”*

3.23 The advice confirmed that the sequential test should cover the whole borough and wider. It also confirmed that the test should consider the full capacity of the site, i.e a 1,000 pupil school.

4.0 APPROACH TO SEQUENTIAL TEST

4.1 Our approach to meeting the requirement of the Sequential Test includes four tasks. These are based upon the 'Guidance' for Flood risk and coastal change provided by the DCLG, and the Council's 'Strategic Flood Risk Assessment - Level 1' (SFRA).

Task 1 – Search Area Identification

4.2 Section 6.3.1 of the Council's SFRA states that *'The default area should be the entire borough.'*

4.3 As identified in Section 3, the proposed search area comprises all land within the London Borough of Richmond and, due to proximity, the entirety of the London Borough of Hounslow.

Task 2 – Site Identification

4.4 The first task is to identify the alternative sites to be tested. The SFRA advises sources of where these could be selected from include the following:

"List of sites prepared as part of the evidence base or background documents produced to inform the Local Plan, such as the London Borough of Richmond upon Thames' Monitoring Report and five year housing land supply.

Sites listed under a Local Authority's brownfield land register, which contains information on previously developed sites that are considered to be appropriate for residential development. This includes sites with and without planning permission."

4.5 For this assessment we have considered the following:

- [Richmond Draft Local Plan](#) (10 December 2021) Site Allocations – Allocation 1 – 37
- Draft [Hounslow Local Plan Review](#) (July 2019) Volume 2 – Site Allocations
- [Greater London Authority Brownfield Land Register](#)

4.6 Each of the above are considered further below from 4.9 onwards.

4.7 We have only included sites identified in the above searches that meet the following criteria:

- Located within the search area.
- That are 4 hectares or greater in site area. Whilst the subject site is 9.7 hectares, the MOL, ecology/ habitat corridor and listed buildings on the Site, impact upon the development potential. As such, on a less constrained site it may be possible for the facilities to be provided on a smaller site area. On a site of less than 4 ha, it would not be possible to deliver both the

teaching facilities required and indoor and outdoor sports facilities, required for a 1,000 person school.

- Site with in excess of 100,000 sqft of floorspace, or with capacity to deliver this quantum or greater of floorspace. The total floor area of the Proposed Development is approximately 148,000 sqft.
- That are suitably located for development for an education establishment, either through conversion of existing accommodation, new build development on a vacant site or demolition and rebuild.
- Located in an accessible location, that pupils can reach safely and via public transport.

4.8 The purpose of these parameters is to ensure that the sites being assessed are comparable to that of the Site and would ultimately be capable of providing the type and character of development required by the Applicant and which is similar to the application scheme. For a site to be an actual alternative to the Site there needs to be a comparison of like for like and it needs to be suitable for meeting the Applicant's required function.

Local Plan Documents

4.9 As of December 2021, consultation started on the Council's Pre-Publication (Regulation 18) Draft Local Plan. This is considered to be the most up to date LBR document to identify potential sites, suitable and available for development. Within the LBR Draft Local Plan (December 2021), there are 37 site allocations. We have assessed all sites proposed to be allocated, with a site area over 5 hectares. Sites smaller than this have been excluded, because as explained earlier in this report they would not be of a size feasible to deliver the applicant's Proposed Development.

4.10 We have not undertaken a review of the sites allocated within the existing adopted Richmond Local Plan (July 2018) Site Allocations SA1 – SA26, in addition to the Draft Local Plan, because it is reasonable to assume that if these sites have not been carried forward to the Draft Local Plan, that they have already been built out or are no longer sites suitable for development. If this was not the case, they would be included in the recent Draft Local Plan. Some sites have been carried across from the 2018 Plan, where these remain available and therefore these sites will be included in our search.

4.11 The Hounslow Local Plan Review was submitted to the Planning Inspectorate for independent examination on 14 December 2020 and Hearings took place in late 2021. The Draft Hounslow Local Plan Review (July 2019) Volume 2 – Site Allocations formed part of the submission to the

Inspectorate. It identifies 108 site allocations in the borough. We have assessed all sites proposed to be allocated, with a site area over 5 hectares. Sites smaller than this have been excluded, because as explained earlier in this report they would not be of a size feasible to deliver the applicant's Proposed Development.

4.12 For the same reasons as explained above for LBR, we have not undertaken a review of the Hounslow Local Plan (2015) Volume 2 – Site Allocations. This is because any sites that remain available and suitable for development can reasonably be expected to have been carried across to the Draft Local Plan Review.

4.13 The GLA's London Brownfield Land Register has also been reviewed. Whilst there are a high number of sites within this document in both LBR and LBR, the vast majority are small sites (primarily sites of less than 1ha). Some sites identified have also been identified from the Local Plan Site Allocations search. Only two additional sites were identified from this search. One in each borough.

Planning History Search

4.14 It would be very unusual for an application to come forward for a school or to convert an existing building to a school of the size required, on a speculative basis. A school provider would progress an application only if they had an identified need.

4.15 We are aware of a number of school developments that have come forward in LBR in recent years. For example, Turing House School, Hospital Bridge Rd, Whitton, Twickenham and Richmond upon Thames College, Langhorn Drive, Twickenham. These developments were brought forward by the education provider and therefore would not be available for the Applicant. A planning history search has therefore not been undertaken, as it is not considered a suitable search parameter for the type of use proposed.

Availability Search

4.16 Costar Focus is an online database used by property professionals to monitor sites that are on the market, for both sale and rent. Agents list the properties that they are marketing on the database. EGi Property Link is also another online resource where agents list available properties.

4.17 A search of both Costar Focus and EGi was undertaken by DWD on the 19th September 2022 of the full search area. Whilst the Applicant's preference is for a freehold property, for completeness, the search included both freehold and leasehold opportunities. Both cleared sites and sites with existing built development that could be converted or demolished and re-built have been considered.

- 4.18 A range of agent's websites which list available properties that they are marketing were also searched including Knight Frank and JLL.
- 4.19 The proposed use requires a high quantum of floorspace and land to provide the required teaching and ancillary accommodation, and the indoor and outdoor sports facilities. In an urban area, like LBR and LBH, opportunities to acquire sites of this size required and suitable for the proposed use, particularly with access to open space, would be expected to be fairly rare.

Summary of Task 2

- 4.20 Task 2 identified a total of 24 sites. Each of these sites was carried forward to Task 3 and 4 to be further assessed.

Task 3 – Flood Zone Identification

- 4.21 The third task is to establish which flood zone the sites to be assessed are located in, and therefore whether they are sequentially preferable. A review of the Environment Agency's Flood Map for Planning has been used to confirm which parts of the respective sites are in each flood zone. The sequential test includes sites within Flood Zone 1, 2 and 3.
- 4.22 Where an identified site falls within Flood Zone 2 or 3 they are discounted as this is considered to be less preferable than Flood Zone 1, regardless of surface water or groundwater flooding. Where an identified site falls within Flood Zone 1, like the subject Site, then surface-water and groundwater flooding are assessed. If the site is comparable or better than the Proposed Development then further assessments are made (see Task 4).
- 4.23 The extract below from the Environment Agency's Flood Map shows that the majority of the land in the search area falls within Flood Zone 1, but that there are some areas falling within Flood Zone 2 and 3.

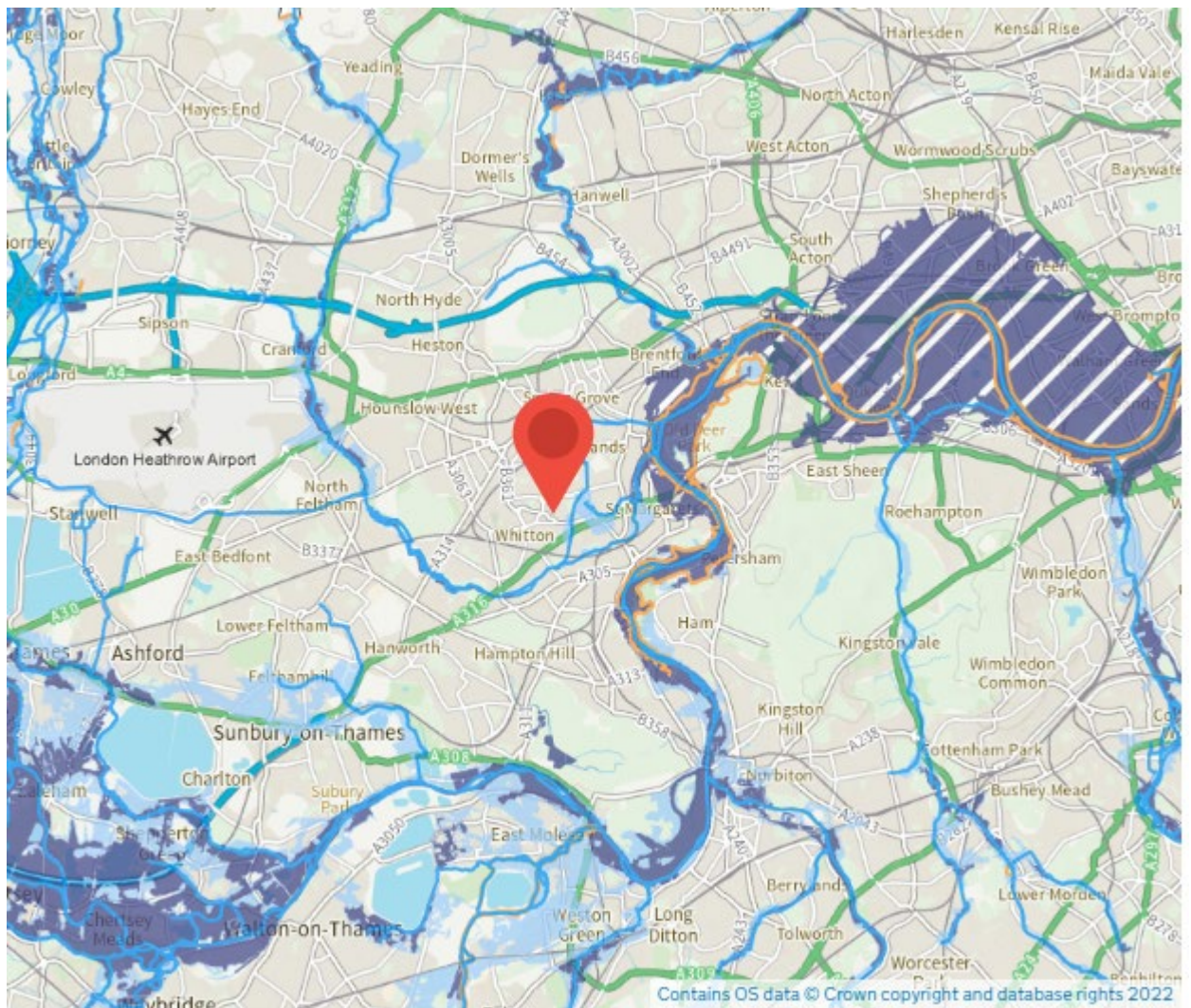


Figure 6: Flood Risk Map for Planning – Fluvial Flood Risk

4.24 The extract below from the Environment Agency’s Surface Water Flood Map shows that the surface water flooding is frequent in areas where there is open space.

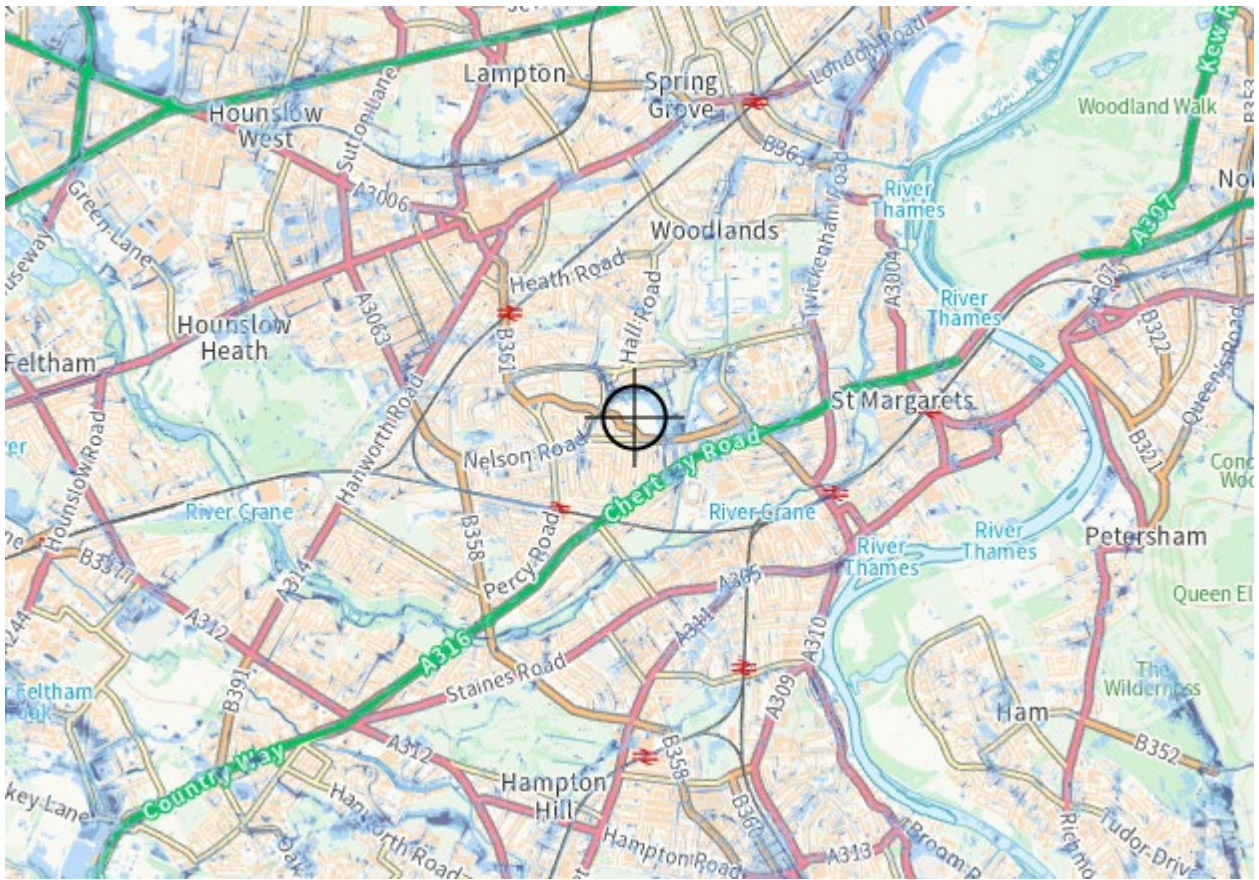


Figure 7: Flood Risk Map for Planning – Surface Water Flood Risk

Summary of Task 3

- 4.25 Of the 24 sites identified as part of Task 1, 14 are entirely within Flood Risk Zone 1, 4 are in Flood Zone 2 (or part Zone 1, part Zone 2) and 6 are in Flood Zone 3 (or at least part in Zone 3, with part in Zone 1 and 2). Therefore, the majority of sites identified were in a sequentially equivalent location, in terms of fluvial Flood Risk.
- 4.26 Surface water flood risk was also considered for each site. For the majority of the sites, at least part of the site contained land with low – high surface water flood risk. Like the subject site, for those sites that experience surface water flood risk, it was only part of the site at risk of this, not the entire site.
- 4.27 All 24 sites were progressed to Task 3.

Task 4 – Site Assessment

- 4.28 The third task is to carry out a desk-based assessment, from publicly available information, of whether the sites identified are 'reasonably available'. This assessment considers the following:
- Address of site

- Has the site been allocated in the Local Plan?
- When is the site available for development?
- Is the site currently occupied/in use?
- Can the owner be identified or are there multiple ownerships?
- Has there been any planning activity (a review of the planning history)?
- What is the site area?
- Is the site being pursued by other third parties?
- Are there any known development constraints?
- Any further supporting information about the site?

4.29 Answering these questions allows DWD to determine whether or not a site is a reasonable alternative in comparison to the subject Site which is available for development now.

[Summary of Task 4](#)

4.30 A summary of Task 4 is provided at **Appendix 1**.

5.0 FINDINGS OF THE SEQUENTIAL TEST

- 5.1 We have carried out a Borough-wide search that considers all potentially suitable and available sites within the search area.
- 5.2 A total of 24 sites, that were identified at Task 2 above, have been assessed as part of Task 3 and 4. The sequential analysis that has been undertaken for each site is provided at **Appendix 3**.
- 5.3 The table below provides a summary each of the sites:

Address of site	Local Authority	Flood Zone	Suitability
Firestone LDN, West Cross Industrial Park, Shield Drive, Brentford, Middlesex, TW8 9DE	Hounslow	1	No due to site area. Falls below search area required. Protected industrial use, will constrain ability to convert to education use.
Orbital West, Aerodrome Way, Heston, TW5 9QA	Hounslow	1	No due to site area. Falls below search area required. Protected industrial use, will constrain ability to convert to education use.
Building 6, Chiswick Park, 566 Chiswick High Road, Chiswick, London, W4 5HR	Hounslow	1	No due to site area. Falls below search area required. Protected office use, will constrain ability to convert to education use. No outside space.
Central Park Prime, Staines Road, Feltham, TW4 5DJ	Hounslow	2	Protected industrial use, will constrain ability to convert to education use.
Richmond Hill Campus, Queens Road, Richmond, TW10 6JP	Richmond	1	No due to site area. Falls below search area required. Insufficient outside space.
St Mary's University, Strawberry Hill, Twickenham TW1 4SX	Richmond	1	No as not available and in use by another education organisation
Richmond upon Thames College, Twickenham, TW2 7SJ	Richmond	1 Playing Fields - 2	No as not available and in use by another education organisation
Twickenham Stadium, Twickenham, TW2 7BA	Richmond	2	No as not available and in use by another organisation
Richmond Athletic Association Ground, Old Deer Park, Richmond, TW9 2AZ	Richmond	1	No as not available and in use by another organisation
Stag Brewery, Lower	Richmond	3	No as not available and in use by another organisation for mixed use development.

Richmond Road, Mortlake, SW14 7ET			
Sky Campus, Centaurs Business Park, Syon Lane, Isleworth, Osterley and Spring Grove Ward, TW7 5QD	Hounslow	3	No as not available and in use by another organisation for mixed use development. Loss of industrial would not be supported.
West Cross Industrial Estate, West Cross Industrial Estate, Osterley and Spring Grove Ward, TW8 9EX	Hounslow	1	No as not available. Loss of industrial would not be supported.
Car Park, Glaxo Smithkline, 980 Great West Road, Brentford Ward, TW8 9GS	Hounslow	1	Not suitable for school use. Nor is land available.
Land between Stanwell Road, A30, Staines Road, Bedfont, Bedfont Ward, TW14 8RY	Hounslow	1	Allocated for housing/ airport business hub therefore not suitable for school use.
Land North of Bedfont Road, Bedfont Road, Bedfont Ward, TW14 8BF	Hounslow	1	Not available. SINC. Allocated for residential.
Land to the South of Saandy Drive, Bounded by Railway Line, Feltham, Bedfont Ward, TW14 8BD	Hounslow	1	Not available. SINC. Allocated for mixed use development.
753 Staines Road, Feltham, Bedfont Ward, TW14 8RH	Hounslow	1	Not available. Green Belt. Allocated for residential.
Heathrow International Trading Estate, Green Lane, Cranford Ward, TW4 6HB	Hounslow	Part Flood Zone 3a and Flood Zone 2.	Protected industrial use, will constrain ability to convert to education use.
Feltham Garrison, Elmwood Avenue, Hanworth Park Ward, TW13 7AH	Hounslow	1	Not available. Allocated for residential.
Southhall Lane, Southall, Heston West Ward, TW5 9NS	Hounslow	1	Not available. Allocated for mineral extraction/ industrial.
Cavalry Barracks, Beavers Lane, Hounslow West Ward, TW4 6HD	Hounslow	2	Not available, being pursued by others. Allocated for residential.
West Middlesex Hospital, Twickenham Road, Syon Ward, TW7 6AF	Hounslow	Eastern Part - 3	Not available, pursued for alternative use. Flood Zone 3.
Land to the South Side of, Brentford High Street, Brentford, TW8 8EW	Hounslow	3	Not available, being pursued by others for a mixed use development. Flood Zone 3.
St Paul's School, Lonsdale Road, Barnes, SW13 9JT	Richmond	3	No as not available and in use by another organisation as a school. Flood Zone 3.

- 5.4 Some of the sites would not be suitable for the Proposed Development and the majority of the site's identified are not available. Some sites have already been developed out by others or are being pursued by other parties, either for employment/ business uses or residential development. A number of the sites identified are within allocated industrial areas. A school use would therefore be in conflict with the adopted policy and in addition to this, an industrial area is unlikely to be a suitable location for a school use, as a result of the neighbouring uses, noise and pupil safety.
- 5.5 Some of the sites identified are being developed or are allocated for education uses, but all, except one, of these sites are occupied or proposed to be occupied by another school provider and would not therefore be suitable for the Proposed Development. There is one site that is available and its existing use is an education use. However, the size of this site and the quantum of floorspace it offers would not be sufficient to deliver the Proposed Development, and in particular the proposed indoor and outdoor sports facilities.
- 5.6 There is no site that is available and suitable for the Proposed Development.
- 5.7 Therefore, it is possible to conclude that there are no reasonable available alternative sites in a lower flood risk zone to accommodate the application proposal.
- 5.8 The search has identified that there is limited land available for development of the type proposed by the Applicant.

6.0 EXCEPTION TEST

- 6.1 The Proposed Development is located in Flood Zone 1. It is only the northern and north western parts of the Site that fall within the surface water flood risk area. The submitted Flood Risk Assessment identifies that the Proposed Development will result in broadly the same quantum of build development in the surface water flood risk area, as existing. The majority of the proposed built development sits outside of the surface water flood risk area.
- 6.2 The Proposed Development includes a comprehensive drainage strategy, that introduces permeable paving, a soakaway, an infiltration basin and green roofs on new buildings. It follows the drainage hierarchy and would control run off from impermeable areas at the source and attenuate through the SuDs features. The proposal would reduce the surface water discharge run off rates to a betterment of 84.7%.
- 6.3 The Proposed Development will deliver a range of benefits for pupils and the local area, including:
- The re-use of an allocated brownfield site.
 - Providing a comprehensive SuDS strategy to manage flood risk and to result in a significant reduction in surface water discharge run off rates. A betterment of 84.7% is proposed.
 - Improved teaching and sporting facilities for existing pupils of Radnor House School that will relocate to the Kneller Hall site.
 - Additional school places in the Borough, providing greater education choice, providing circa 590 additional school places for senior school aged pupils, once the school reaches capacity at 1,000 pupils.
 - Job opportunities, for a wide range of job types with different skills sets. The school is expected to employ up to 170 staff and circa 70 of these jobs will be new roles.
 - Opportunities for local community groups and local schools to hire the sports facilities. There area associated health and wellbeing benefits of this.
 - Community links with Whitton through inviting local residents to attend concerts, shows and events run by the school throughout the year, and in particular to outside Bandstand concerts in the Summer months.
 - Re-use existing buildings, and to convert these so that they can be brought into beneficial use, helping to ensure the long term viability of the Site.

- Ensure the long term protection and enhancement of the Grade II listed Kneller Hall, through the restoration of the listed buildings and the retention of the historic asset.

6.4 It is therefore considered that as a result of the scheme's benefits and the proposed management of flood risk and surface water flood risk on the Site, through the scheme design and SuDS strategy, that the Proposed Development satisfies the Exception Test.

7.0 SUMMARY AND CONCLUSIONS

- 7.1 This report has been prepared by DWD on behalf of the Applicant.
- 7.2 The Proposed Development seeks to provide a senior school with capacity for up to 1,000 pupils. When the school initially opens in September 2023, the existing pupils from Year 7 upwards based at Radnor House will move across to the Kneller Hall site. This is a total of approximately 410 pupils. The new school site needs to continue to be accessible for these existing pupils, to ensure that they are able to continue to travel to school.
- 7.3 The search area has therefore been determined by assessing the catchment area of existing pupils, and by considering the distance in which pupils could live and walk or cycle to the proposed site in 20 minutes. A search area of the entirety of the LBR and LBH has been adopted. This is considered to be a comprehensive search area.
- 7.4 The proposed use requires a high quantum of floorspace and land to provide the required teaching and ancillary accommodation, and the indoor and outdoor sports facilities. In an urban area, like LBR and LBH, opportunities to acquire sites of this size, particularly with access to open space, would be expected to be fairly infrequent.
- 7.5 The assessment has demonstrated that there are no sequentially preferable sites within the search area that are reasonably available alternatives, within a lower probability of flooding, that would be appropriate for the type of development proposed. On this basis, it is considered that the Sequential Test has been satisfied.
- 7.6 The Proposed Development includes a comprehensive drainage strategy, that introduces permeable paving, a soakaway, an infiltration basin and green roofs on new buildings. It follows the drainage hierarchy and would control run off from impermeable areas at the source and attenuate through the SuDs features. The proposal would reduce the drainage water discharge run off rates to a betterment of 84.7%. It is considered that the Exception Test has been satisfied.
- 7.7 The proposed development will deliver a range of benefits for pupils and the local area.

APPENDIX 1: SEQUENTIAL TEST

Sequential Test -September 2022														Sep-22	
	Address of site	Local Authority	Site Area (approx.)	Flood Zone - Fluvial	Surface Water	Source	Vacant or Current Use	Allocated in Local Plan	Ownership	Planning Status	Development Constraints	Being pursued by others	Availability	Suitability	Comments and Conclusion
1	Firestone LDN, West Cross Industrial Park, Shield Drive, Brentford, Middlesex, TW8 9DE	Hounslow	Approx 2ha Approx 4.94 acres	1	Edges of site - Low Risk. Remainder - Very Low	Online Search - Egi/ Knight Frank Website	Vacant	Yes	Private	Industrial Use	Strategic Industrial Location (SIL): No net loss of existing Industrial floorspace. Leasehold only available, which is likely to constraint alterations to the site that would be permitted by freeholder.	Site being marketed by Knight Frank.	Yes - currently on market. Competitive bidding. Tenure: Leasehold	No due to site area. Falls below search area required. Protected industrial use, will constrain ability to convert to education use.	Industrial Property. Specification: 104,584 sqft, 15m eaves height, 40 metre yard depth, 8 dock level loading doors, 2 level access loading doors, 750 KVA, 2 storey Grade A offices, car parking & cycle bays, 17 EV charging points. Building style and specification does not lend itself to education use. Additional floor area would need to be introduced through mezzanines. Likely to result in very compromised floorspace. Safety concerns associated with industrial estate location. Leasehold only available. Site area surrounding build development not of a sufficient size to facilitate delivery of outside sports pitches. Site has a PTAL of 1b - poor accessibility.
2	Orbital West, Aerodrome Way, Heston, TW5 9QA	Hounslow	Approx 3.21ha Approx 7.91 acres	1	Parts of site - Low to High. Remainder - Very Low	Online Search - Egi/ JLL Website	Vacant	No	Private	Industrial Use	Local Significant Industrial Location (LSIL): No net loss of existing Industrial floorspace. Leasehold only available, which is likely to constraint alterations to the site that would be permitted by freeholder.	Site being marketed by JLL.	Yes - currently on market. Competitive bidding. Tenure: Leasehold	No due to site area. Falls below search area required. Protected industrial use, will constrain ability to convert to education use.	Industrial Property. Specification: 113,604 sqft. 12m eaves, 2 dock level loading doors, 27 ground level loading doors 740 KWH power capacity, Self contained fenced site with secure yard, 190 car parking and 101 van parking spaces. Limited yard area would constrain ability for outside sports at the site. Building style and specification does not lend itself to education use. Additional floor area would need to be introduced through mezzanines. Likely to result in very compromised floorspace. Safety concerns associated with industrial estate location. Leasehold only available.
3	Building 6, Chiswick Park, 566 Chiswick High Road, Chiswick, London, W4 5HR	Hounslow	Approx 0.5ha Approx 1.24 acres	1	Very Low	Online Search - Egi/ JLL Website	Vacant	No	Private	Office Use	Key Existing Office Location - protected by policy. Leasehold only available, which is likely to constraint alterations to the site that would be permitted by freeholder.	Site being marketed by JLL.	Yes - currently on market. Competitive bidding. Tenure: Leasehold	No due to site area. Falls below search area required. Protected office use, will constrain ability to convert to education use. No outside space.	Grade A Offices: up to 105,626 sqft available, Specification: Double height entrance lobby, Shared manned reception and security, Fully fitted office floors, Kitchen/ breakout areas 4 Pipe Fan Coil Air Conditioning, Metal ceiling tiles with integral PIR lighting, Full access raised floors Cat6a cabling throughout, Independent secure comms rooms, Shower and changing facilities, 1:1,400 sq ft secure parking spaces, EPC Rating of C 147 seater auditorium, No outside space. The site would not allow the school to provide the indoor and outdoor sports facilities. The floorspace falls below the area needed and there is no scope for further floor area on this site. It would not be suitable to deliver a school. A site with no land would also not be suitable, as no sports facilities could be delivered.
4	Central Park Prime, Staines Road, Feltham, TW4 5DJ	Hounslow	Approx 5.15ha Approx 12.72 acres	2	Very Low	Online Search - Egi/ JLL Website	Vacant	No	Private	Industrial/ Warehouse	Industrial Use - protected by policy. Leasehold only available, which is likely to constraint alterations to the site that would be permitted by freeholder.	Site being marketed by JLL.	Yes - currently on market. Competitive bidding. Tenure: Leasehold	Protected industrial use, will constrain ability to convert to education use.	Industrial/ Warehouse. Specification: Up to 12m eaves, Dock and level access loading, C. 10% offices at first floor, Secure fenced yards, Detached units. Central Park Prime will provide up to 160,000 sq ft in a single unit or individual units from 19,000 sq ft
5	Richmond Hill Campus, Queens Road, Richmond, TW10 6JP	Richmond	5 acres 2.1 hectares	1	Parts of the Site - High Risk	Online Search - Egi/ Knight Frank Website	Vacant - previous University use	No	Private	None. Education Use.	Grade II Listed Building. Building of Townscape Merit. Located in Conservation Area,	Site being marketed by Knight Frank.	Yes - currently on market. Competitive bidding. Tenure: Freehold	No due to site area. Falls below search area required. Insufficient outside space.	The 2.1 hectare site has limited land available to deliver the sports facilities required to serve the school. The Grade II listing means that any additional built development on the site would need to preserve the building's historic significance. The building has .105,500 sq ft of floorspace relative to the proposed development which has 148,000 sqft. Further work would be required to ascertain the feasibility of increasing the floorspace at the Site to support a 1,000 pupil school. Additional floor area would further reduce the extent of open space, further limiting the potential for outside sports facilities. The site is also in an area partly at risk of surface water flooding. The site has a PTAL score of 1b, meaning that it has poor access to public transport links. By contrast Kneller Hall has a PTAL score of 1b and 2. It is therefore marginally more accessible.
6	St Mary's University, Strawberry Hill, Twickenham TW1 4SX	Richmond	12.08 ha 29.85 acres	1	Very Low	Draft Local Plan Site Allocation 10	Occupied	Yes	Private	University	Education Use	Yes. In Use as a University. Use expected to continue.	No as not available and in use by another education organisation	Draft Local Plan Allocation: Retention and upgrading of St Mary's University and its associated teaching, sport and student residential accommodation. Upgrade works to include refurbishment, adaptation, intensification, extensions and new build elements on site where justified fully with regard to national policy and the policies of the development plan. A Masterplan and/or site development brief, which encompasses the main campus in Strawberry Hill as well as Teddington Lock, together with new estates and student accommodation strategies, will be prepared in conjunction with the Council. This will guide future development for St Mary's University, both on and off site. The site is not available or on the market and the allocation relates to the enhancement of facilities to serve the university. The site could not therefore be used to deliver a school..	

	Address of site	Local Authority	Site Area (approx.)	Flood Zone - Fluvial	Surface Water	Source	Vacant or Current Use	Allocated in Local Plan	Ownership	Planning Status	Development Constraints	Being pursued by others	Availability	Suitability	Comments and Conclusion
7	Richmond upon Thames College, Twickenham, TW2 7SJ	Richmond	8.65 ha 21.37 acres	1 Playing Fields - 2	Parts of site low/ medium	Draft Local Plan Site Allocation 11	Occupied	Yes	Public	College	Education Use	Yes. In Use as a College/ secondary school. Use expected to continue.	No - not available.	No as not available and in use by another education organisation	Draft Local Plan Allocation: Redevelopment to provide a new replacement college, science / technology / engineering / maths centre, technical hub (B1), a new secondary school and special education needs school, sports centre as well as residential including affordable housing. Protection and upgrading of the playing field to the south of the college, including the installation of a new artificial grass (3G) playing pitch. The site is not available or on the market. Planning permission has been secured for the redevelopment of this site, and its delivery is being pursued. . The site could not therefore be used to deliver a senior school.
8	Twickenham Stadium, Twickenham, TW2 7BA	Richmond	12.62 ha 31.18 acres	2	Parts of site low - high	Draft Local Plan Site Allocation 13	Occupied	Yes	Private	Sports Stadium	Sports Facilities protected by policy.	Yes. In Use as Rugby Stadium. Use expected to continue.	No - not available.	No as not available and in use by another organisation	Draft Local Plan Allocation: The Council supports the continued use and improvement of the grounds for sports uses. Appropriate additional facilities including new stands, indoor leisure, hotel or business uses, as well as hospitality and conference facilities, may be supported provided that they are complementary to the main use of the site as a sports ground. The allocation relates to development that improves the existing sport use. A school could not therefore be delivered on the site as the land is required for continuing sports use.
9	Richmond Athletic Association Ground, Old Deer Park, Richmond, TW9 2AZ	Richmond	9.93 ha 25.54 acres	1	Low	Draft Local Plan Site Allocation 33	Occupied/ In Use	Yes	Public	Sports Grounds	Sports Facilities protected by policy. MOL designation.	Yes. In Use as Council owned sports facilities.	No - not available.	No as not available and in use by another organisation	Draft Local Plan Allocation: The Council supports the continued use of this site for sports uses, including improvements and upgrading of existing facilities. Additional associated leisure facilities and other complementary uses could be incorporated provided they have been fully justified as being necessary to support the continued sporting uses on the site, that they demonstrate meeting identified needs, do not detract from the main use of the site as a sports ground, and have been developed to take account of the Metropolitan Open Land (MOL) and historic designations. The site is designated as MOL and the sports use is protected by policy. Whilst the site has scope to deliver improved outdoor sports facilities, it could not be used to deliver a school or indoor sports facilities. The site is also not available and is already being pursued.
10	Stag Brewery, Lower Richmond Road, Mortlake, SW14 7ET	Richmond	8.77 ha 21.67 acres	3	Very Low	Draft Local Plan Site Allocation 34	Vacant - redevelopment site.	Yes	Private	Former Brewery. Vacant.	Flood risk. Brownfield Site.	Yes - planning applications submitted by Developer	No - not available.	No as not available and in use by another organisation for mixed use development.	The owner of the site, Reselton Properties Limited, has submitted two planning applications outlining their proposals to create a mixed development consisting of residential, community, education, recreational and commercial uses. The scheme includes: Delivery of up to 1,085 new residential units (including affordable housing); ii. Provision of a new six form entry secondary school with new sports facilities which will be available for community use outside of school hours; iii. New community space. Application awaiting determination. Applications follow previously refused schemes. LBRuT has advised that the need for secondary school places is pressing. The site is therefore required to deliver this secondary school and is not available to deliver the Applicant's private sector school.
11	Sky Campus, Centaurs Business Park, Syon Lane, Isleworth, Osterley and Spring Grove Ward, TW7 5QD	Hounslow	14 ha 34.59 acres	3	Parts of site low	Draft Local Plan Allocation 1	Occupied	Yes	Private	Broadcasting, Production and associated activities (B1)	Strategic Industrial Location (SIL): No net loss of industrial floorspace. Listed buildings.	Yes	No - not available.	No as not available and in use by another organisation for mixed use development. Loss of industrial would not be supported.	Draft Local Plan Allocation: The Sky Campus will continue to develop as a hub for broadcasting, production and media activities, integrating with the wider Western Hub. Site is protected for industrial use. It is also not available. It is therefore not suitable for our client's proposed use.
12	West Cross Industrial Estate, West Cross Industrial Estate, Osterley and Spring Grove Ward, TW8 9EX	Hounslow	9.3 ha 22.98 acres	1	Majority Very Low. Small parts Low.	Draft Local Plan Allocation 5	Part Vacant/ Part Occupied	Yes	Private	Industrial	Strategic Industrial Location (SIL): No net loss of industrial floorspace. Listed buildings.	Yes	No - not available. Other than leasehold interest identified at (2) above.	No as not available. Loss of industrial would not be supported.	Draft Local Plan Allocation: The West Cross Campus will become a high-quality mixed-use industrial quarter of light industrial, office and other employment uses, in a range of unit sizes, co-located with housing and shared amenities creating a sense of an 'industrial life'. It is a major opportunity for transformation and intensification to take forward the Mayor of London's Policy for industrial intensification and Co-location with residential uses. Site is protected for industrial use. It is also not available (with the exception of the leasehold interest assessed under (2)). It is therefore not suitable for our client's proposed use.
13	Car Park, Glaxo Smithkline, 980 Great West Road, Brentford Ward, TW8 9GS	Hounslow	5.2 ha 12.85 acres	1	Very Low. At edges Very High.	Draft Local Plan Allocation 15	Occupied as car park	Yes	Private	Car Park	Key Existing Office Location: No net loss of existing office floorspace. Listed Buildings.	Unknown	No - not available.	Not suitable for school use. Nor is land available.	Draft Local Plan Allocation: The GSK Building will be extended to provide high quality, modern, Office (B1a) space. No planning applications have been pursued to date. The land is protected for office use. Not available or on market. Unlikely to be suitable for school use. Concerns associated with proximity to busy road.
14	Land between Stanwell Road, A30, Staines Road, Bedfont, Bedfont Ward, TW14 8RY	Hounslow	31.9 ha 78.82 acres	1	Northern part - Very Low. Southern part: Low - Very High	Draft Local Plan Allocation 38	Undeveloped land	Yes	Private	Open Land	Site of Importance for Nature Conservation (SINC): no significant impact on biodiversity. Scheduled Ancient Monument. Archaeological Priority Area. Land Contamination/Historic landfill	Unknown	No - not available.	Allocated for housing/ airport business hub therefore not suitable for school use.	Draft Local Plan Allocation: Heathrow Gateway will be a major new neighbourhood in Hounslow, comprising new homes, open space and a new airport business hub providing high quality commercial office space centered around the new Bedfont Lakes Station and integrated with Bedfont lakes office park to the south. Business (B1a/b) with and Retail (A1-A4), Hotel (C1), Residential (C3), Community Use (D2) and Open Space. The land is being promoted and pursued for alternative uses. Would not be available for school use and nor would policy support the school use.
15	Land North of Bedfont Road, Bedfont Road, Bedfont Ward, TW14 8BF	Hounslow	10 ha 24.71 acres	1	Parts low to medium	Draft Local Plan Allocation 39	Undeveloped land	Yes	Public	Open Land	Site of Importance for Nature Conservation (SINC): no significant impact on biodiversity. Land Contamination/ Historic landfill	Unknown	No - not available.	Not available. SINC. Allocated for residential.	Site of Importance for Nature Conservation (SINC): development will be permitted only where it can be shown that significant adverse impact on biodiversity is avoided, mitigated, or as a last resort, compensated for (see Local Plan policy GB7). Draft Local Plan Allocation: South Bedfont will be a new residential neighbourhood close to the new Bedfont station, providing new homes integrated with open space. Opportunities to improve these connections to support higher density development should be identified. Residential (C3), and Retail (A1-A4), Open Space. Development should facilitate the creation of a new residential neighbourhood of high quality, medium rise flats and terraces. The land is being promoted and pursued for alternative uses. Would not be available for school use and nor would policy support the school use.
16	Land to the South of Saandy Drive, Bounded by Railway Line, Feltham, Bedfont Ward, TW14 8BD	Hounslow	6.9 ha 17.05 acres	1	Parts low to medium	Draft Local Plan Allocation 40	Undeveloped land	Yes	Public	Open Land	Site of Importance for Nature Conservation (SINC): no significant impact on biodiversity. Land Contamination/ Historic landfill.	Unknown	No - not available.	Not available. SINC. Allocated for mixed use development.	Site of Importance for Nature Conservation (SINC): development will be permitted only where it can be shown that significant adverse impact on biodiversity is avoided, mitigated, or as a last resort, compensated for (see Local Plan policy GB7). Draft Local Plan Allocation: Bedfont Gardens will be a new residential neighbourhood which opens out onto new and improved parkland with supporting community facilities. Residential (C3), and Retail (A1-A4), Open Space. Access should be through a new road link from Southville Road, and a new cycling and walking bridge crossing the Feltham rail line to the south of the site. Development should facilitate the creation of a new, neighbourhood with a mixture of low rise flats and family sized homes, with supporting community facilities. The land is being promoted and pursued for alternative uses. Would not be available for school use and nor would policy support the school use.

	Address of site	Local Authority	Site Area (approx.)	Flood Zone - Fluvial	Surface Water	Source	Vacant or Current Use	Allocated in Local Plan	Ownership	Planning Status	Development Constraints	Being pursued by others	Availability	Suitability	Comments and Conclusion
17	753 Staines Road, Feltham, Bedfont Ward, TW14 8RH	Hounslow	6.8 ha 16.80 acres	1	Low	Draft Local Plan Allocation 42	Undeveloped land	Yes	Private	Open Land	Green Belt: must demonstrate VSC. LSIS: Site adjacent to the East is protected for industrial uses. Land Contamination/ Historic landfill	Unknown	No - not available.	Not available. Green Belt. Allocated for residential.	Draft Local Plan Allocation: Bedfont Lakes West will be developed proceeding the provision of Bedfont Station with new homes and a new park on the adjacent Green Belt. Residential (C3) and Open Space. Access to the site should be from Ascot Road. Redevelopment should facilitate the delivery of walking and cycling access through and across the site. Development subject to Southern Rail Access and/or improved PTAL. The site is allocated as Green Belt which constrains development potential. The site is allocated for alternative purposes and would not be suitable to deliver a school.
18	Heathrow International Trading Estate, Green Lane, Cranford Ward, TW4 6HB	Hounslow	5.4 ha 13.34 acres	Part Flood Zone 3a and Flood Zone 2.	Low	Draft Local Plan Allocation 43	Part Occupied/ Part Vacant	Yes	Private	Mixed use light industrial	Locally Significant Industrial Site (LSIS): No net loss of existing Industrial floorspace. Land Contamination/ Historic landfill. Flood Risk	Unknown	No - not available.	Protected industrial use, will constrain ability to convert to education use.	Draft Local Plan Allocation: Heathrow International Trading Estate will be redeveloped to provide new industrial business space and units to support the borough's future employment needs. Light Industrial (B1c), Industrial (B2/B8). Access to the site should be maintained from Green Lane. The land is being promoted and pursued for alternative uses. Protected industrial use. Would not be available for school use and nor would policy support the school use. Flood Risk 3 would also constrain development potential.
19	Feltham Garrison, Elmwood Avenue, Hanworth Park Ward, TW13 7AH	Hounslow	14.1 ha 34.84 acres	1	Majority - very low. Parts - low - high	Draft Local Plan Allocation 64	Redevelopment site	Yes	Public	Military Base (Sui-Generis)	Site adjoins Local Open Space. Conservation Area. Land Contamination/ Historic landfill	Unknown	No - not available.	Not available. Allocated for residential.	Draft Local Plan Allocation: The site will be redeveloped into a major new residential area of Feltham, with a new school, public open space, and community uses. Redevelopment in line with e Feltham Masterplan. Residential (C3), Business (B1a/b), open space, community uses, and other supporting uses. The land is being promoted and pursued for alternative uses. Would not be available for school use and nor would policy support the school use.
20	Southall Lane, Southall, Heston West Ward, TW5 9NS	Hounslow	14.4 ha 35.58 acres	1	Majority - very low. Parts - low - high	Draft Local Plan Allocation 77	Undeveloped land	Yes	Public	Open Land	Land Contamination/ Historic landfill	Unknown	No - not available.	Not available. Allocated for mineral extraction/ industrial.	Draft Local Plan Allocation: Land will be utilised for mineral extraction, with redevelopment to industrial uses in the long term. The land is being promoted and pursued for alternative uses. Would not be available for school use and nor would policy support the school use.
21	Cavalry Barracks, Beavers Lane, Hounslow West Ward, TW4 6HD	Hounslow	14.8 ha 36.57 acres	2	Majority - very low. Small area - low - high	Draft Local Plan Allocation 84	Redevelopment site	Yes	Public	Military Barracks (Sui-Generis, ancillary D2, B1 Uses)	Conservation Area. Listed Buildings. Industrial History Site. Noise: site within noise contour of Heathrow Airport	Yes - by developer for housing	No - not available.	Not available, being pursued by others. Allocated for residential.	Draft Local Plan Allocation: Land will be redeveloped to provide a new residential area. Residential (C3), Retail (A1-A4, Business (B1a/b), Community (D1), Leisure (D2) and Open Space. Development in line with Heston and Cranford Place Policy and the Hounslow Cavalry Barracks SPD. The land is being promoted and pursued for alternative uses. Would not be available for school use and nor would policy support the school use.
22	West Middlesex Hospital, Twickenham Road, Syon Ward, TW7 6AF	Hounslow	7.6 ha 18.78 acres	Eastern Part 3	Majority - very low. Small area - low - medium	Draft Local Plan Allocation 103	Occupied	Yes	Public	Hospital (D1)	Site adjoins Local Open Space. Conservation Area. Flood Risk.	Yes - NHS	No - not available.	Not available, pursued for alternative use. Flood Zone 3.	Draft Local Plan Allocation: Major hospital including accident and emergency and other specialist units. Health (D1) with residential (C3), retail, business (B1a/b). Redevelopment of part of the hospital estate for new health (D2) uses, supporting ancillary mixed uses, and residential development. The land is being promoted and pursued for alternative uses. Would not be available for school use and nor would policy support the school use. Flood Risk 3 would also constrain development potential.
23	Land to the South Side of, Brentford High Street, Brentford, TW8 8EW	Hounslow	5.02 ha 12.4 acres	3	Low	Brownfield Land Register	Redevelopment site	No	Private	Mixed Use redevelopment site	Flood Zone 3. Brownfield site.	Yes - planning secured by Ballymore for residential led development	No - not available.	Not available, being pursued by others for a mixed use development. Flood Zone 3.	Ballymore are pursuing the development known as the Brentford Project. Outline planning granted and scheme is being implemented: Hybrid planning application (part detail part outline) for the demolition of existing buildings and retention of a number of buildings as part of a comprehensive mixed use development comprising a maximum of 111,821sqm (GEA) including a maximum of 876 residential units along with associated works. The proposed development includes retail (A1 use), residential (C3 use), business (B1 use) and leisure (D1/D2 use) and associated uses as part of the development including car parking, cycle storage, and an energy centre. Site is already being pursued by another party for a scheme which has been consented. It is therefore not available for the client's proposed use. The site is also provided to deliver a significant quantum of housing, a use supported by policy. The land is being promoted and pursued for by another party. Would not be available for applicant's proposed development. Flood Risk 3 would also constrains development potential.
24	St Paul's School, Lonsdale Road, Barnes, SW13 9JT	Richmond	17.98 ha 44.42 acres	3	Low	Brownfield Land Register	Occupied	No	Private	Education - School	Flood Zone 3.	Yes	No - not available.	No as not available and in use by another organisation as a school. Flood Zone 3.	The site has been in education use for many year, with a number of applications submitted associated with the enhancement of the facilities on the site. In 2017 a large scale redevelopment scheme at the site was consented (ref. 08/1760/EXT). St Pauls School intend to continue to occupy the site and therefore it is not available for our client's proposed development. The site is used and expected to continue to be used by another school operator. Flood Zone 3 also constrains development potential.