

Operational Need and Metropolitan Open Land Statement

Thames Young Mariners, Riverside Drive, Richmond

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Prepared for:



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Alternative Site Assessment

List of Schools and Groups which have used TYM in 2021/22





Executive Summary

This statement has been prepared by Vail Williams on behalf of Surrey County Council to provide justification for the development within MOL at the site known as Thames Young Mariners, Riverside Drive, Richmond. The site is currently operated by Surrey Outdoor Learning and Development who provide learning and development opportunities for children in Richmond, Surrey and other London Borough's

SOLD are seeking to redevelopment the site as the existing buildings are coming to the end of their operational life and are inefficient in relation to energy use and sustainability, are out-dated and do not maximise opportunities for accessibility and inclusivity. SOLD are also looking to incorporate new guest residential accommodation which will enable year-round residential stays for children where currently only seasonal accommodation is provided through tepee camping.

The proposed development seeks:

Demolition of existing buildings and construction of replacement buildings with associated residential accommodation, changing block, replacement staff accommodation and outdoor activity equipment including high ropes, climbing wall, coasteering course, supporting pontoons with associated hard and soft landscaping and parking.

Many of the principle elements of the proposals are considered to be appropriate development within MOL comprising provision of appropriate facilities for outdoor sport and recreation that preserve the openness of the Green Belt (NPPF para 149) which includes the principle of replacement buildings on previously developed land, high ropes course and replacement climbing wall. However due to the increase in height and scale of the proposed buildings required to accommodate SOLD's operational requirements, sustainability requirements and good design principles, the cumulative impact of the proposals will have a greater, albeit low, impact on openness compared to existing development. The proposals are therefore required to demonstrate Very Special Circumstances.

The impact on MOL has been reduced as far as possible but locating development in areas of previously developed land and ensuring all elements of the proposals are as space efficient as possible whilst still meeting Building Regulation requirements and still meeting the necessary sustainability and net zero requirements

The impact the proposals on MOL is considered to be low in spatial and visual terms and when considered against the five purposes of the Green Belt. Although the impact is considered low, this carries significant weight in the planning balance.

The benefits of the scheme have been summarised below and form the set of very special circumstances:

- Retention and enhancement of existing outdoor learning and education centre in Richmond to create a high-quality and fit for purpose facility which can be accessed by schools, colleges and community groups in Richmond, London and Surrey.
- Unique facility within London with no other outdoor activity centres in London offering
 residential accommodation to support the outdoor learning activities which could be
 provide all year round as a result of the development.
- Provision essential piece of social infrastructure for Richmond, London and Surrey.





- Provides opportunity for SOLD to offer year-round learning from the site to increase offer to schools, colleges and community groups and provision of year-round residential accommodation to support outdoor learning.
- Strongly aligns with London Plan policies to improve the health of Londoners' (policy GG3) and access to education, recreation and sport facilities (Policies S3, S4, S5)
- Strongly aligns with London Plan MOL policy to enhance the quality and range of uses in MOL.
- No alternative sites to provide the development outside MOL/Green Belt location and aligns with Neighbourhood Plan allocation to support community facility within Richmond.
- Significantly improves accessibility to site to ensure inclusivity and accessibility for all.
- Redevelopment of a previously developed site to meet an identified need for outdoor learning/recreational facilities within Richmond.
- Creates an opportunity to enhance the sustainability and environmental credentials of the site.
- No other harms arising from the development through the design of the proposals and suitable mitigation measures. The proposals will generate a significant number of technical benefits, particularly in relation to sustainable drainage, carbon reduction, car parking layout and accessibility, energy efficiency and landscaping.







Figure 1 - The SOLD ethos





1 Introduction

1.1. Vail Williams LLP has been instructed by Surrey County Council (SCC) to prepare this Metropolitan Open Land (MOL) Statement to support the full planning application for the redevelopment of Surrey Outdoor Learning and Development ('SOLD') site at Thames Young Mariners, Riverside Drive, Richmond, TX10 7RX. The full planning application is seeking:

'Demolition of existing buildings and construction of replacement buildings with associated residential accommodation, changing block, replacement staff accommodation and outdoor activity equipment including high ropes, climbing wall, coasteering course, supporting pontoons with associated hard and soft landscaping and parking.'

- 1.2. The application site sites wholly within MOL and therefore this statement has been prepared to present justification for development within MOL and demonstrate that Very Special Circumstances exist to allow redevelopment in the MOL.
- 1.3. The statement will set out the background of the site and why SOLD are seeking to redevelop the site along with how the existing site contributes towards MOL and the impact the development may have on the openness of MOL.
- 1.4. The statement will also consider 'any other harm' which may be caused by the development and should be weighed in the planning balance.







2 Planning Policy Context

2.1. This planning policy focuses on the key MOL/Green Belt policies used when assessing applications for development within MOL/Green Belt locations. A full planning policy review has been included within the Planning Statement which supports this application submission together with a suite of technical plans and documentation.

National Planning Policy Framework (NPPF)

- 2.2. Paragraph 138 sets out that the Green Belt serves five purposes:
 - a) to check the unrestricted sprawl of large built-up areas;
 - b) to prevent neighbouring towns merging into one another;
 - c) to assist in safeguarding the countryside from encroachment;
 - d) to preserve the setting and special character of historic towns; and
 - e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
- 2.3. Paragraph 98 states, 'Access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities, and can deliver wider benefits for nature and support efforts to address climate change.' (our emphasis)
- 2.4. Paragraph 99 also explains that existing open space, sports and recreational buildings and land, including playing fields should not be built upon unless a number of criteria are met.
- 2.5. Paragraph 147 of the NPPF states, 'Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.'
- 2.6. Paragraph 148 goes onto state, 'When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.'
- 2.7. The NPPF reference a number of exceptions where the construction of new buildings would not be inappropriate in the Green Belt which includes, 'the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it;' (para 149 (b)) and 'limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt than the existing development;' (para 149 (g))

London Plan 2021

- 2.8. Policy GG3 relates to creating a healthy city and states that, 'to improve Londoners' health and reduce health inequalities, those involved in planning and development must:
- A. ensure that the wider determinants of health are addressed in an integrated and coordinated way, taking a systematic approach to improving the mental and physical health of all Londoners and reducing health inequalities
- B. promote more active and healthy lives for all Londoners and enable them to make healthy choices





- C. use the Healthy Streets Approach to prioritise health in all planning decisions
- D. assess the potential impacts of development proposals and Development Plans on the mental and physical health and wellbeing of communities, in order to mitigate any potential negative impacts, maximise potential positive impacts, and help reduce health inequalities, for example through the use of Health Impact Assessments
- E. plan for appropriate health and care infrastructure to address the needs of London's changing and growing population
- F. seek to improve London's air quality, reduce public exposure to poor air quality and minimise inequalities in levels of exposure to air pollution
- G. plan for improved access to and quality of green spaces, the provision of new green infrastructure, and spaces for play, recreation and sports
- H. ensure that new buildings are well-insulated and sufficiently ventilated to avoid the health problems associated with damp, heat and cold
- I. seek to create a healthy food environment, increasing the availability of healthy food and restricting unhealthy options.
- 2.9. Policy G3 states, Metropolitan Open Land (MOL) is afforded the same status and level of protection as Green Belt: 1) MOL should be protected from inappropriate development in accordance with national planning policy tests that apply to the Green Belt 2) boroughs should work with partners to enhance the quality and range of uses of MOL.
- 2.10. The justification text for Policy G3, s.8.3.1 sets out that MOL, 'MOL protects and enhances the open environment and improves Londoners' quality of life by providing localities which offer sporting and leisure use, heritage value, biodiversity, food growing, and health benefits through encouraging walking, running and other physical activity.' (our emphasis)
- 2.11. Policy S3, S4 an S5 relate to provision of education, childcare, sports and recreation facilities. All policies, although relate to slightly different areas set out that developments should seek to 'maximise the multiple use of facilities, and encourage the co-location of services between sports providers, schools, colleges, universities and other community Facilities.'
- 2.12. Section 5.5.1 explains that, 'Sport and recreation facilities are important components of social infrastructure. Both **formal and informal facilities** should be provided, to encourage physical activity and deliver a range of social, health and wellbeing benefits to communities. People take part in various forms of sport and recreation which require a number of different types of facility. Many activities require minimal facilities, and often an open space or community hall can be sufficient.' (out emphasis)

Richmond Council Local Plan 2018

2.13. Policy LP13 states, 'the borough's Green Belt and Metropolitan Open Land will be protected and retained in predominantly open use. Inappropriate development will be refused unless, 'very special circumstances' can be demonstrated that clearly outweigh the harm to the Green Belt or Metropolitan Open Land. Appropriate uses within Green Belt or Metropolitan Open Land include public and private open spaces and playing fields, open recreation and sport, biodiversity including rivers and bodies of water and open community uses including allotments and cemeteries. Development will be supported if it is appropriate and helps secure the objectives of improving the Green Belt or Metropolitan Open Land.' (our emphasis)

Ham and Petersham Neighbourhood Plan 2018

2.14. The Ham and Petersham Neighbourhood Plan identifies the TYM site and playground/sports provision within its community facility policy. Policy CF1 states, 'The extension or relocation of local community facilities will be supported, subject to the services provided being maintained or





improved. When there is no longer an identified community need for an existing community use or when it is relocated, primary consideration should be given to using and adapting the vacated premises for other community uses.'





3 Background to Surrey Outdoor Learning and Development (SOLD)

- 3.1. SOLD's vision is to: 'Consistently provide high quality outcome led, outdoor learning experiences that are developmental, ethical and sustainable'. The SOLD mission is to: 'Inspire and engage young people and adults with high quality outdoor learning experiences that improve and enrich their personal, social, emotional and physical development, with a view to achieving success in life'.
- 3.2. SOLD is committed to 'achieving positive personal development through outdoor experiences that challenge and develop behaviours and physical ability. Through these outdoor experiences, we guide participants to discover more about themselves by developing personal, social, emotional, and physical skills. The SOLD team treat each person they work with as an individual with his or her own unique core strengths, abilities and limitations. Self-awareness and the recognition of achievement are the two fundamental principles behind SOLD's work. Participants must assess their own capabilities in order to perform and progress. Participants will grow in confidence and be encouraged to reflect on and celebrate their achievements. The learning which comes from this experience will then be transferred and linked to the challenges and opportunities of everyday life.
- 3.3. SOLD is committed to working towards a core set of values including: prioritising young people, always exceeding expectations, developing positive relationships, embracing diversity and respecting the natural environment. These values guide and inform our service delivery every single day.
- 3.4. As part of each visit to a SOLD centre, the team supports the participants to identify their key intended learning outcomes, which can include the following:
 - Participation
 - Setting goals
 - Broaden horizons
 - Development
 - Self-awareness
 - Confidence
 - Cooperation
 - Physical ability
 - Communication
 - Leadership
- 3.5. SOLD operates from 3 sites; High Ashurst on Boxhill in the Surrey Hills AONB, Henley Fort on the Hog's Back in Guildford and the application site, Thames Young Mariners next to the River Thames in Richmond. Each site offers a slightly different setting and uniqueness for learning for children who participate. For example, the Henley Fort site is a Victorian Fort built during the late 19th Century to protect London from invasion by the French. It was later used by the Home Guard in World War 2 as a re-supply depot. SOLD therefore offer groups a chance to take part in activities







Figure 2- Examples of existing learning material in existing woodland setting

environment as part of the learning process for groups during day or residential visits. This is supported by London Plan policy which seeks to support sport and recreation facilities as an

important part of social infrastructure within

London.

3.8. The TYM site was established over 60 years ago and provides outdoor learning programmes through day and camping visits to schools, colleges and University's, SEN schools, youth groups, cubs, guides, vulnerable and looked after children and Duke of Edinburgh's Awards participants.

3.9. Examples of current Richmond user groups at TYM are: Meadlands Primary School, Fern Hill Primary School, Queens C of E school, Kew Riverside Primary, Barnes Primary School, Achieving for Children, Ham and Petersham Scouts, and St. Mary's University. A full list of schools and groups which have visited TYM in the last 12 months has been included in Appendix 1 of this report. A total of 35 schools, colleges/groups from within Richmond Borough booked either day or residential visit to TYM in the last 12 months, a

or living historical experience in an authentic setting. This is different to the TYM site where SOLD can offer water-based activities because of the location adjacent to the Thames.

SOLD also offers a unique service for schools, youth and community groups which aims to enable those organisations to embed an outdoor learning ethos to their curriculum and purpose. This service includes providing advice, guidance, support and training for those organisations as well as offering a peripatectic outreach service where SOLD deliver outdoor learning in school grounds and community spaces. SOLD has a strong reputation for inspiring other organisations to engage with learning outdoors and providing the expertise to make this happen.

3.7. As demonstrated above SOLD seek to operate their sites and offer learning activities which respond to the sites' existing unique outdoor setting and use that natural



Figure 3 - Example of outdoor education tools in Little Squirrels area





total of 7 organisations booked from other London Boroughs outside Richmond and 12 from the Surrey region. The groups that have visited the TYM site have used the site for a variety of purposes including those listed in section 3.12 in addition to learning about the environment and woodland skills and learning within the natural environment.

- 3.10. Groups who attend the TYM site are from; Richmond, wider London Borough's, Surrey and beyond. Groups will attend for overnight stays during April-October when SOLD operate a Tepee village or day visits for schools, youth and community groups. SOLD also operate The Adventure Zone (TAZ) which provides evening, weekend and school holiday activities for children up to 16 years old and families.
- 3.11. SOLD also operate an area of the site known as Little Squirrels. Little Squirrels is a 'stay and play' 2 hour session for 18months to 4 year olds and their parents and carers. The Little Squirrels area offers an opportunity for young children to discover and play in a woodland setting. Forest Schools enable children to develop and learn the boundaries of behaviour, both physical and social, as well as establish and grow in confidence, self-esteem and motivation. Activities for those using Little squirrels includes:
 - Bug Hunting
 - Craft using natural materials
 - Tree and plant identification
 - Basic tool use
- 3.12. This further demonstrates the importance of the natural environment to SOLD's ability to offer children of all ages learning and development in the outdoors.
- 3.13. In the last 12 months 3,420 young people were booked onto the TAZ programme with 2,912 of that total having booked from locations within Richmond or another London Borough. The remaining 508 bookings from the Surrey region.
- 3.14. The activities currently operating at TYM include:
 - Tepee camping (April to October only)
 - Canoeing
 - Sailing
 - Raft building
 - Open water swimming
 - Stand Up Paddleboarding
 - Archery
 - Low ropes course
 - Climbing wall
 - Orienteering
 - Woodland Activities





- Kayaking
- Bell Boating
- Environmental and nature-based activity.
- 3.15. SOLD is registered with Ofsted for the provision of after school hours and school holiday provision for young people aged 5 years plus. This is because SOLD is the 'responsible parent' during these programmes.
- 3.16. The current operation at TYM is unique within Richmond as it provides a varied outdoor environment for children to learn and be involved in both water and land-based activities. The area of open water provides a sheltered and controlled body of water which allows introductory water-based activity to take place segregated from the main River Thames.
- 3.17. SOLD's service provides a unique and essential educational approach to local schools, community and youth groups which engages learners in the natural environment.
- 3.18. To provide context around where else these facilities are offered to Londoners, there are currently five water activity centres in Greater London in addition to TYM; Lee Valley, Shadwell Basin, London Docklands, Wimbledon Park Lake and Albany Park in Kingston. These water activity centres offer similar activities such as sailing, kayaking, team building activities. However, all other centres only offer day visits with no opportunity for overnight stays. TYM is therefore a unique facility within Greater London by offering residential accommodation alongside the outdoor learning activities.
- 3.19. For safety and security reasons associated with the users of the site, the site is not fully open to the public. SOLD have a thorough Safeguarding policy, which aims to protect the children, young people and vulnerable adults who use the centre. It would not be safe or appropriate to allow members of the public on to the site without a pre-arranged booking. Any individual or group who wishes to access the activities at TYM currently has to make a booking via the central Sold Business Support Team or online booking system. This system is also used for parents and others who want to book children onto the TAZ programme.
- 3.20. SOLD are continually engaging with schools, colleges and community groups located in Richmond along with the wider London and Surrey regions about what is offered at the TYM site. SOLD currently undertake this engagement through the SOLD website, social media, community events, training events, consultations, conferences, open days, networking meetings, newsletters, email and telephone.



Figure 4 - image of outdoor learning around existing species on site





4 Existing Site at TYM

- 4.1. As noted in the previous section the site caters for a wide range of outdoors learning and recreation for children and young people and can enjoyed without restriction at this time.
- 4.2. The existing site at TYM site currently provides 1,795sqm of buildings and structures which SOLD operate their activities from. These buildings include the following uses:
 - Hall space for dining, indoor group activities, meeting/briefing space for larger groups
 - Kitchen/catering space
 - On-site staff accommodation unit
 - Dry storage
 - Changing space
 - Classroom space
 - Storage of activity equipment and maintenance area
- 4.3. In addition to the 1,795sqm of building floor area, areas of hardstanding/structures are also located on the existing site which are used for activities/operations including:
 - Archery area
 - Low ropes course
 - Climbing wall area
 - Area for coasteering course (across water activity been removed due to condition)
 - Areas for parking and access
 - Areas for access to water's edge and pontoon
 - Tepee tents (April/October only)
 - Floating pontoon blocks (moveable)
- 4.4. These buildings and structures define the site as previously developed land and support SOLD in operating the site for the activities set out in section 3 of this statement.
- 4.5. The buildings and structures extend over an area of site towards the south west of the site forming a compact cluster of predominantly single storey buildings.
- 4.6. The remainder of the site to the south of the lake is predominantly free from development, save for the access road from Riverside Drive to the main cluster of buildings and has a more open character. The north of the lake is free from development but is heavily wooded and, in parts, not accessible due to the density of scrub. As the area to the north of the lake will not be affected by the development, it falls outside the planning application boundary and is not considered in further detail within this report.
- 4.7. The cluster of buildings to the south of the lake are predominantly single storey in height. The main building to the west of the cluster can be viewed as two storey from the west due to the level change of the site creating a lower ground and ground floor level. There is also a small area of building, viewed as a tower which extends above ground floor level. The site contains activity





equipment and paraphernalia associated with the existing activities currently operating from the site.

- 4.8. The other buildings on site are single storey with some pitched roofs and some flat roof construction. The existing buildings do have urbanising effect on the MOL, this effect is limited by the scale and layout of the buildings which are not overly dominant in the landscape but seek to be of a necessary scale to support SOLD's existing operations without detracting from the surrounding environment. The area which surrounds the existing buildings and the wider site is undeveloped and open. The water-body on the site also contributes towards the openness of the wider site.
- 4.9. Richmond Council have undertaken a Green Belt, MOL, LGS and OOLTI Review in 2021 to inform their new Local Plan preparation. As part of the MOL review the TYM site was assessed within a parcel no. 8 (Ham House, Douglas House, Richmond Hill Rise, Ham Common, Ham Polo, Buccleugh Gardens, Greycourt School, Petersham Lodge, Petersham Meadows) for its contribution towards the MOL in line with Policy G3 of the London Plan. The assessment identifies the parcel includes Thames Young Mariners outdoor activity centre which should be considered as a recreation and learning facility which serves both Richmond and the wider London Boroughs
- 4.10. It should be noted that the presence of TYM within the MOL contributes toward the quality and range of uses in the MOL in line with Policy G3, part A and provides open air facilities for recreation and learning. TYM does attract groups from not only Richmond but wider London Boroughs (Policy G3, part B) and therefore should be retained to continue to contribute towards the purposes of the MOL in line with Policy G3 whilst not conflicting with the purposes of the Green Belt as set out in the NPPF.
- 4.11. In relation to protecting from unrestricted sprawl (NPPF para 138 part a) the wider site does serve to protect from sprawl from the east particularly by virtue of the lake covering a large proportion of the site, which provides a strong defence to any sprawl from development. The site sits between areas known as Ham Lands which, in combination, does form a buffer to prevent development sprawl moving east to west. With regard to part b the Thames forms a strong defensible barrier to avoid Teddington/Twickenham merging into Ham from the west. The site, again in combination with the wider Ham Lands, does seek to protect against development moving east towards the Thames and assists in providing a break between development on the west of the Thames and Ham.







- 4.12. As the site is allocated as a community facility and is adjacent to Ham Lands to the north and south, it is not considered to be countryside and therefore part c of paragraph 138 is not relevant in this part of the MOL. Part d is also not relevant by virtue of the distance of the site from any historic towns. Finally part e has some relevance as although the site is not derelict, it is considered previously developed land with existing urban features and therefore redevelopment of the site will assist in regenerating the site to ensure it is retained for its outdoor education use.
- 4.13. Having assessed the existing TYM site both in terms of its existing operations and built development, the site does contribute to certain aspects of the purposes of the Green Belt, particularly in relation to protecting against unrestricted sprawl from a Green Belt perspective and purposes of MOL in terms of contributing towards the range and quality of uses of MOL.





5 Need for Development and Existing Site Constraints

- 5.1. TYM is significantly constrained by a number of factors including: a lack of accessible and inclusive facilities for SEN users, outdated changing and shower facilities which are not fit for purpose, restrictive kitchen and dining space, lack of all year round accommodation, no drying or adequate storage space for PPE, outdated buildings which are environmentally unsustainable, toilet, changing and shower facilities which do not meet the user demand on site.
- 5.2. The existing buildings are also unsustainable including energy inefficient with buildings having poor thermal insultation and the site currently being heated using gas boilers.
- 5.3. The conclusion of the feasibility was recommendation for replacement with new buildings. Due to the age and condition of existing buildings the ability to bring up to energy efficiency standards were not considered possible. There would have been significant extension to the existing buildings to meet the accommodation need, which would be compromised by retention of parts of the existing complex, leading to an increased density of built form within the open setting.
- 5.4. A new build solution would allow the organisation and placement of buildings to respond to the lake and views, with a sense of arrival created that is missing at the existing site. New buildings are shown spaced apart to open views through the site. Modern construction methods would allow for off-site manufacture, greater levels of efficiency to minimise energy consumption and integrate renewable technology. Inclusivity and accessibility would be easier to provide through a consistent approach, to meet the varied needs of visiting school children and community groups.
- 5.5. The need for redevelopment of the site at TYM has been led by the lack of facilities to meet the demand from a wide and diverse range of potential users who are being excluded from accessing the site. This includes users who require accessible and individual toilet, changing and shower facilities, users for whom camping is not appropriate accommodation, users who wish to visit in the autumn and winter months and users from smaller more specialist organisations who are not able to share facilities.
- 5.6. Despite an increased demand in the service provided at TYM, this demand cannot be met due to the very 'seasonal' limitations of the site and because the current facilities are so poor and restrictive. This results in a valuable facility which is underutilised and therefore exclusive only to users who can afford 'peak time' prices and programmes. The development would allow for increased capacity with an all year round offer with a maximum of 240 people on site providing options for users based on price, facilities and programme.
 - 5.7. As part of SCC's consideration of the site, an options appraisal was undertaken to assess the development options for the site which included whether it would be appropriate to retain all buildings on site and refurbish existing buildings, replace some buildings or undertake a full redevelopment.
 - 5.8. It was concluded that the most appropriate option to ensure the most efficient use of space on site, maximising sustainability improvements and meeting SOLD's operational requirements would be to demolish all built form on site and consolidate the built space into new buildings. However, areas of hardstanding which are not so affected by these matters (such as the access road and pedestrian walkways) can be returned and should be incorporated into the design and layout of the new buildings.





6 Lack of Alternative Options

- 6.1. Prior to assessing the impact on MOL/Green Belt, an alternative site assessment has been undertaken to establish whether any potential harm arising from redevelopment in MOL can be avoided by relocating the development to a site outside the Green Belt/MOL or an area which performs more poorly against the purposes of the Green Belt or MOL.
- 6.2. Following pre-application engagement with the GLA it was confirmed that an alternative site assessment was not required given the nature of the proposals however the report has been included in the submission for completeness.
- 6.3. The search was primarily focused around Richmond Borough, however as groups do travel from other London Boroughs and Surrey District and Boroughs the site search was extended to ensure a reasonable assessment has been undertaken of any available sites in the surrounding area.
- 6.4. This alternative site assessment has been included within Appendix 2 of this report.
- 6.5. As part of the site search methodology, a notification was set out to the local market to establish if any sites with access to a water body/river with land adjacent which could be used for outdoor activities were available. No market opportunities came back from local agents.
- 6.6. Subsequently a review was undertaken based on Vail Williams local knowledge of canals, rivers and water bodies along this stretch of the Thames.
- 6.7. Full details of the search results can be found in the supporting alternative site assessment report. However it has been concluded that the TYM site is the only available, suitable which can deliver the development in a reasonable time period. Due to the search area, almost all other sites were located within the Green Belt and therefore had to be assessed against other criteria including whether they were greenfield or brownfield sites or whether they were located within a flood zone (making them more unsuitable for overnight residential accommodation). There were no other suitable sites within Richmond or London Boroughs for this type of development.
- 6.8. As the TYM site is the only suitable site, albeit it is within MOL, development should seek to reduce any impacts on the MOL as far as possible and demonstrate that any identified harm is clearly outweighed by the benefits of the development.





7 Support for the Retention of SOLD at the TYM Site

- 7.1. As part of the pre-submission work undertaken by SOLD, engagement was undertaken with the local community, as well as local groups and Councillors. A public engagement event was undertaken in April 2022 in addition to an online survey which ran between 11th April 2022 and 17th May 2022 where the community were able to comment on the proposals. The full results from the comments received have been included in the Surrey County Council Statement of Community Involvement report submitted with the planning application.
- 7.2. It should be noted that there was strong local support for the redevelopment of the existing TYM site to retain and enhance the outdoor learning provision on 79% of respondents strongly supporting and 20% supporting the principle of redevelopment. Also, a total of 55% strongly supported and 35% supported the design principles and site arrangement of the proposals.





8 Justification for Proposals

- 8.1. Given the need for the development and the lack of alternative sites outside MOL full redevelopment of the existing TYM is proposed.
- 8.2. The proposal would involve the demolition of all existing buildings on site, 1,795.95sqm (GIA) and development of 1,974sqm (GIA) with a total footprint of 1,764sqm (GEA). These buildings are proposed within areas of the site which are considered previously developed.
- 8.3. Wherever possible the proposals have sought to retain and make use of existing hardstanding to keep development within the confines of the existing development footprint. This includes areas such as the existing access road, access around the buildings and access to the pontoons. All existing operations and activities will be either be retained as existing or relocated within the site. This includes the following:
 - Low ropes (to remain unchanged from existing)
 - Archery (to remain unchanged from existing)
 - Climbing wall (to be relocated to alternative area of the site)
 - Little squirrels' areas (to remain unchanged from existing)
 - Tepee camping (to remain unchanged from existing to be operated April-October)
 - Coasteering across water (new course to be reinstated in previous location)
 - On-site staff accommodation unit (to be re-provided in new building)
 - Main hall and catering (to be re-provided in new building, same location)
 - Changing and toilet facilities (to be relocated and enhanced facilities throughout site)
 - Classrooms and indoor teaching spaces (to be re-provided in new buildings)
- 8.4. Whilst the proposals propose to re-provide all of the existing operations on the site in new, high-quality buildings, the proposals also seek to incorporate additional facilities which will support the existing SOLD operations, enabling SOLD to offer a greater variety of learning and development opportunities through the year which includes:
 - New high ropes course
 - New guest residential accommodation
- 8.5. A breakdown of the floor areas can be found in the Design and Access Statement but has been set out below for ease:





Schedule	Existing Building Provision	GIA	Quantity	Total Area
EI	Existing Building	502.77	I	502.77
E2	Existing Building	434.56	I	434.56
E3	Existing Building	82.23	I	82.23
E4	Existing Building	73.76	I	73.76
E5	Existing Building	188.26	I	188.26
AI	Ancillary Structures	514.37	I	514.37

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Schedule	Proposed Building Provision	GIA	Quantity	Total Area
ВІ	Main Building	1008.84	- 1	1008.84
B2	Guest Residential	255.25	3	765.75
В3	Camping Changing	199.6	- 1	199.6

Proposed Total Gross Internal Area 1974.19	Proposed	d Total Gross	Internal Area	1974.19
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Existing GIA	1795.95
Proposed GIA	1974.19
Total Increase In Gross Internal Area	178.24

- 8.6. The new residential accommodation is a core element of the development proposals comprising three single storey buildings of 255.25sqm (GIA) per building to enable SOLD to offer residential trips for schools, colleges and community groups on a year round basis. This is in comparison to current operations where only camping can be provided in summer months as SOLD currently does not have any built residential accommodation on the TYM site.
- 8.7. To reflect the scale of existing buildings on site, the proposed buildings will be partly single storey in height and comprise a number of smaller buildings to break up the mass of development whilst remaining within the previously developed areas of the site. An area of the main building will include a two storey element to accommodate the replacement staff accommodation unit within the site. The remainder of the two storey element is required to accommodate the plant needed to meet the buildings sustainability criteria.
- 8.8. The remaining single storey buildings will comprise a variety of flat and pitched roofs to break up the mass of the buildings and to again reflect the character of existing buildings on site. Where feasible on flat roofs, green roofs are proposed with pitched roofs incorporating PV panels on pitches at an appropriate orientation to the sun path.
- 8.9. Details around the requirement for the scale of development has been covered in detail within the Design and Access Statement including where sizes have been driven by Building Regulations, sustainability requirements or accessibility requirements. The height of the proposed buildings have had to increase from the existing buildings to accommodate for thermal insultation to control heat loss and sufficient space to accommodate ventilation systems which cannot be provided in existing buildings because the floor to ceiling heights are too low. The reliance on openable windows and gas fired heating through radiators in the existing





building is no longer considered sustainable but the new build solution does require a greater height of building to deliver these improved sustainability credentials.





9 Impact on Metropolitan Open Land

9.1. Whilst elements of the proposed development may be considered appropriate MOL development given the association with outdoor sport and recreation, as the proposals will introduce new operations and new development into MOL. The proposals may lead to a change in the openness of the MOL however the design of the proposals has sought to limit the impact on openness as far as practically possible. This section will consider the existing and proposed impact on MOL from both a spatial and visual perspective in order to assess the level of harm to openness arising from the development.



Figure 5 - Overlay of existing building footprints over proposed prepared by Pick Everards

Spatial Impact

- 9.2. For the purposes of assessing the spatial impact of development, the site can be thought of in two main areas. Firstly, the area to the east which is predominantly free from development save for the access road into the site. Secondly the area to the west which contains the main cluster of buildings, development and activity. These areas will be considered in turn as they differ in characteristics and purpose.
- 9.3. The first area to the east is an open area of the site with the only form of permanent development being the road into the site. The area is used of overspill parking at key drop-off/pick-up times but this is for short-periods with the majority of time containing no vehicles or other structures. The area has some scattered trees towards the far eastern side of the site and along the southern boundary but otherwise has an open character with views towards the existing development to the west. In all other directions this space is read in the context of the surrounding natural environment that contains no significant built development features.
- 9.4. The proposed development recognises the open character of this area and therefore is not proposing any new development in this area of the site to maintain its undeveloped and open character. A pedestrian pathway along the access road and a vehicle passing point is proposed following recommendations of the highways consultant on highway safety grounds and is





- therefore an unavoidable element of development in this area. Some new landscaping will also be incorporated into this area as shown on the proposed plans to improve the biodiversity and ecological value of the area but otherwise it will remain unchanged from existing.
- 9.5. It is therefore considered that the proposals will have a negligible impact on the spatial aspect of MOL in the eastern area of the site as the development required in this area is minor, but necessary and will not affect how this area is perceived as an open and undeveloped space.
- 9.6. The second area of the site to the west has a much different character to the west with limited views through this part of the site and a more urban character as a result of the number of existing buildings in this area. This area contains the majority of the activity area so is perceived as the more intensely used part of the site not only because of the buildings but also the activity generated from the site's operations with young people and staff using the site for outdoor learning.
- 9.7. The proposed design has followed the existing building envelope to minimise the spatial impact on MOL resulting from the development. The principle of replacing buildings on previously developed land within the Green Belt and development associated with outdoor recreation are considered to be appropriate development within the Green Belt as defined by the NPPF. The redevelopment of the existing buildings, the reprovision of the coasteering and climbing wall and provision of new high ropes are all considered to be appropriate types of development for the MOL. However due to the requirement for the building to be a greater height and scale compared to the existing development on site, the development as a whole is considered to be inappropriate in MOL terms.
- 9.8. The proposed development has sought to consolidate building footprints to create 5 new buildings on the site within the development envelope. These consolidated buildings will have more efficient footprints compared the existing buildings to ensure most efficient use of floorspace. Furthermore, where existing built space or hardstanding is not required, this is proposed to be removed and reverted back to undeveloped space. This approach has resulted in the proposals requiring an increase in hardstanding of around 12sqm which is a negligible change over the existing scenario.
- 9.9. These proposed buildings are all within the existing footprints of built development, following the existing road layout which is being retained and therefore avoiding any encroachment or



Figure 6 - Visualisation of proposed development prepared by Pick Everard identifying open area to the east being retained with proposed development towards the west of the site





sprawl into the open area of the site to the east, minimising the spatial impact on MOL openness. This area of the site does have a more urban and built-up character compared to the wider area and therefore introducing replacement development within the existing built envelope footprint should not have a significant impact on space openness in this location. The impact on openness as a result of the proposed development is therefore considered to be low.

Visual Impact

- 9.10. Similarly to the assessment of spatial impact, the assessment of visual impact will consider the site in two broad areas, east and west. There are limited views of the site from public vantage points with the two main views being from the access from Riverside Drive on the eastern boundary of the site and from the Thames Path of the western boundary of the site. There are no easily accessible views of the site from the north or south because of the established and dense trees and scrub adjacent to the northern and southern boundaries of the site. The visual impact of the proposed development is therefore considered from these two views along with views within the site itself.
- 9.11. As set out earlier in this section, the eastern part of the site has an open and undeveloped character.
- 9.12. Given the very limited development proposed in this eastern area, it is considered the visual impact of the development on this area of the site itself will be negligible. From public vantage points, there is only one limited view across the eastern part of the site from the Riverside Drive access point. How the eastern area of the site will be viewed from Riverside Drive following the development will not fundamentally change and will still be viewed as an undeveloped part of the site.
- 9.13. The area to the west will experience the most visual change of the site with all existing buildings being replaced by 5 new buildings along with the relocation of the climbing wall and introduction of the high ropes course into this area.
- 9.14. The proposals will therefore appear differently when the site is viewed from outside the site boundary. The consolidation of buildings seeks to create space between the buildings to open up views through the site. Currently the buildings are enclosed by a fence around the eastern and southern sides of the existing buildings which limits open views across the site. Whilst the proposed buildings will continue to limit full views through the site as is currently the case, by removing the fencing and creating breaks between the buildings, the site will be more visually permeable in some views through the site.
- 9.15. Furthermore, although the proposed building layout will be different from existing, the total building footprints will be of a very similar quantum to existing and therefore the development is not seeking to introduce significant new development into the site. Of the additional floorspace being proposed, much relates to plant and equipment to meet sustainability requirements and ensuring new buildings are fully accessible for all future users of the site which has influenced the level of floorspace proposed.
- 9.16. The proposed high ropes course is a new activity being introduced into the site (all others are existing and are either remaining unchanged or being relocated as part of the development). The high ropes will introduce a new type of activity with associated infrastructure. The high ropes is very visually permeable and therefore is considered to be an appropriate form of Green Belt development under paragraph 149 of the NPPF as outdoor recreation. However as the development must be considered as a whole, this appropriate form of development is considered cumulatively with all other aspects of the development.
- 9.17. The proposed main building, to be located on the footprint of the existing main building, containing the dining area, kitchen, meeting rooms, changing areas etc. will be higher than the existing buildings in this area (14.7m maximum existing building height vs. 17.7m maximum ridge level of proposed building). The increase in the height of the building compared to existing





may have a visual impact on openness. However, the required increase in height compared to existing has been justified within the Design and Access Statement and is as a result of incorporating the building's plant and replacement staff accommodation unit at 1st floor level to reduce the footprints of the proposed building, minimising the spatial impact on MOL. Furthermore, current Building Regulations and H&S requirements influence floor to floor heights which requires an increase in height over existing.

- 9.18. There will also be a visual impact of the development arising from the proposed buildings being of a different design to the existing site which will be visible most prominently from the Thames Path to the west. However, this impact is considered to be a positive visual impact resulting from the development as the proposals provide an opportunity to create a high-quality and sensitively designed landscape-led scheme which will improve the character and appearance of the site.
- 9.19. Whilst there may be a result in visual impact due to the impact in height and resulting mass of the main building, the design, external appearance and landscaping of the proposed development will improve the visual impact of the development compared to the existing buildings. Externally the buildings will include timber cladding and green roofs in response to the natural environment surrounding the site and to allow the development to sensitively integrate itself into the existing environment through the use of natural materials in the building. Furthermore, additional tree planting and landscaping is proposed throughout the development to break-up views into, and across the site and to further soften the development into the existing landscape.
- 9.20. Whilst the development will result in some small increases in footprint and height of new buildings, the main visual impact of the development will change in design and appearance of the western area of the site and there will be no principal change in where buildings are located on site compared to existing. The visual change in the appearance of the building should be considered a positive impact bringing a high quality design into the site to ensure the long-term retention of outdoor learning on this site.



Figure 7 - Landscape Masterplan prepared by Pick Everard





Conclusion on MOL Impact

- 9.21. In conclusion, the site already contains built form and activities associated with outdoor learning and recreation and therefore the proposed development will not result in a principal change in how the site is viewed or experienced from either within the site or when viewed from the two key public vantage points. A number of the elements of the development could in principle be considered appropriate Green Belt development under paragraph 149 of the NPPF as development associated with outdoor recreation and replacement of existing buildings in the same use.
- 9.22. The spatial impact on openness will be low to negligible because of the approach taken to contain almost all development within previously developed parts of the site to avoid encroachment into areas of the site which have an open or undeveloped character and would be more susceptible to openness impacts. The impact on openness is predominantly from a visual perspective because of the change in design and appearance of proposed buildings along with required height increase of the main building to meet design and technical requirements and introduction of the new high ropes activity which will be visible from both inside the site and the view of the site from the Thames Path.
- 9.23. However the visual impact of development has sought to be minimised as far as possible by creating visual breaks in the built development as a result of consolidating development into 5 buildings to allow views through the site. Furthermore, the sensitive design of the proposals to respond to the surrounding environment will minimise as far as possible the visual impact of the development. The proposals are also considered to improve the character and appearance of the site through high quality design which will have a positive visual impact on MOL. The visual impact on MOL openness is therefore considered to be low.
- 9.24. When the development is considered as a whole, the impact on MOL openness is considered to be low with the principle use of the site remaining as existing and will therefore continue to be viewed as a site being operated for outdoor learning and education for young people and children. This low level of harm carries substantial weight in the planning balance (as defined by paragraph 148 of the NPPF) and therefore the benefits of the proposals should be considered against this harm. The benefits of the proposals are considered in details in section 10.





10 Benefits of the Proposals

Benefits of retaining and enhancing outdoor learning on the Site

- 10.1. The proposed development will enable SOLD to offer an enhanced high-quality outdoor learning and development facility which makes a unique contribution to Richmond's outdoor activity offering for young people within the Borough and more widely across London Boroughs and parts of Surrey. The proposals therefore make an important contribution towards social infrastructure of creating healthier communities within London which should carry significant weight. As set out in Policy GG3 of the London Plan, planning and development should promote more active and healthy lives for all Londoners and should maximise potential positive impacts of development along with improving access to quality spaces for play, recreation and sports.
- 10.2. There is compelling evidence to support the benefits of learning and being active outdoors on physical health and emotional wellbeing. Learning through Landscapes¹ has collated a comprehensive library of research that supports SOLD's position of outdoor learning and play benefiting children. This includes research and evidence on how children's experiences in natural environments benefits their education attainment and development of resilience and confidence through to how planned learning outside the classroom significantly contributes to improving students' personal, social and emotional development. The Council for Learning Outside the Classroom ² also provides a sizable library of research and evidence around the significant value outdoor learning can have on young people's learning and development.
- 10.3. The research library includes articles and studies on the value of outdoor learning and access to nature through the COVID-19 pandemic. A paper written by K Samuelsson et al³, explores the importance of urban nature as a source of resilience during social distancing amidst the coronavirus pandemic. The paper considers the importance of access to urban nature which not only has a wide variety of physical and mental health benefits for the population but also contributes towards the short and long-term resilience of an urban area. It should therefore be considered an important priority to ensure that access to high quality outdoor space, particularly which supports young people's learning, should be retained and its enhancement supported.
- 10.4. Not only does the outdoor learning significantly benefit young people's learning and skills development it also offers a greater and more powerful connection to nature and in turn, a greater respect and understanding for the natural environment. A paper written by Bratman, Davie et al (2014)⁴ explores the benefits of nature experience, comparing effects on participants of an urban walk to a nature walk and found that, 'Compared to the urban walk, the nature walk resulted in affective benefits (decreased anxiety, rumination, and negative affect, and preservation of positive affect) as well as cognitive benefits (increased working memory performance).'
- 10.5. This access to nature for learning and wellbeing benefits is even more important in urban areas where access to nature is more limited in comparison to more rural areas. The proposals therefore strongly align with Policy GG3 of the London Plan to improve Londoners' health by promoting active and healthy lives and improving access to quality green spaces, play, recreation and sport. The proposals will retain and enhance the outdoor learning and recreation offering for young people in London and Surrey.
- 10.6. SOLD work closely with local schools, colleges, community groups and families to attract groups from all parts of the Borough. Schools and formal educational settings will benefit by having access, all year around, to an inclusive and holistic outdoor learning curriculum for a wide range of learners. This curriculum is linked to the National Curriculum as well as Higher and Further

¹ Outdoor learning evidence | Learning through Landscapes (ltl.org.uk)

² Research | Council for Learning Outside the Classroom (lotc.org.uk)

³ OSF Preprints | Urban nature as a source of resilience during social distancing amidst the coronavirus pandemic

⁴ Nature and Biodiversity research | Learning through Landscapes (ltl.org.uk)





education curriculums e.g. teacher training, public services etc. Those educational settings will also have increased access to expertise, support and advice for outdoor learning to allow them to do more of it themselves.

- 10.7. It should be noted that both the existing and proposed operations and TYM focus on learning and development. The site does not have a licence to serve alcohol and it is not proposed to expand the operations at TYM to provide evening drinks events for corporate or business events. The proposed development is very much focussed on how SOLD can enhance what it can offer to schools, colleges, community groups and facilities through outdoor activities in line with its core values.
- 10.8. The proposals will not only have significant social and economic benefits but will also have a number of environmental benefits. By redeveloping the buildings on site, the proposals will create opportunities to enhance the sustainability of the site by incorporating PV panels, air source heat pumps, sustainable drainage, use of thermally efficient materials and creating a biodiversity net gain. These technical elements are explored in more detail in the next section of this report but an identified benefits will also be considered in the planning balance.

SOLD's encouragement of healthy eating and living

- 10.9. Policy GG3 of the London Plan also relates to healthy food and eating as part of the contribution to improving the health of Londoners. SOLD's healthy food policy offers total commitment to the provision of healthy, nutritious and balanced meals for users of TYM. This is based on the guidance from the 'Schools Food Trust' and the 'Surrey Healthy Schools Guidance' to which SOLD is an advocate and partner. SOLD recognises the importance and value of not only providing healthy and nutritious meals for visitors, but to also provide opportunities to educate users of the centre in all aspects of eating well. SOLD complies with the 'Eat Out Eat Well' campaign run by Trading Standards and seeks to use locally sourced, ethically produced and sustainable food products and ingredients. SOLD is registered with the Food Standards Agency and currently holds the 5 star Food Hygiene Rating.
- 10.10. SOLD is a key partner with the Surrey Healthy Schools service which aims to ensure that children and young people are healthy, happy and safe. This partnership is committed to providing opportunities to enhance emotional, mental and physical health and improve long term health, reduce inequality, increase social inclusion and raise achievement for children, families and communities as a whole. SOLD actively supports and guides schools in developing their curriculum, highlights good practice and supports pupils, staff and families.
- 10.11. This is further evidence of the benefits on children's learning and development on all aspects of lift which SOLD seek to deliver from the TYM site.

Benefits to SOLD's outdoor learning provision and supporting residential on site

- 10.12. The development proposals will provide significant benefits to SOLD's operations from the site and what it can offer schools, college and community groups for both day and overnight visits.
- 10.13. The new facility will enable greater access and use of the service throughout the year, rather than the very 'seasonal' offer currently. This increased usage will ultimately benefit more children, young people, adults and families with outcomes associated with increased physical health and emotional wellbeing, social skills enabling improved life chances and opportunities and personal development. In particular, the development will enable significantly increased access from participants with additional needs and members of the community who experience disadvantage and vulnerability.





10.14. The proposals will also ensure that an important facility which provides access to outdoor learning and recreation facilities within London is retained and also enhanced. The provision of open air facilities within London is a key requirement of MOL with Policy G3 of the London Plan encouraging Boroughs to work with partners to enhance the quality and range of uses in MOL. Furthermore, the London Plan also identifies that recreation and sports facilities make an important contribution towards social infrastructure and support health and wellbeing benefits for communities. The Ham and Petersham Neighbourhood Plan identifies the TYM as a playground/sports community facility under policy CF1 which supports the extension of local community facilities provided the services are being maintained or improved.

Benefits of Supporting Residential Accommodation

- 10.15. As set out earlier in this report, TYM is a unique facility within Richmond and the wider London area by offering overnight stays alongside the outdoor learning activities. The proposed development will enable SOLD to offer this unique facility on a year round basis by providing permanent residential accommodation on site. Being able to offer both day and residential visits provides users with a choice around how they engage with outdoor learning. For example, for very local schools and groups, they may only be able to afford day visit or only want a day visit as a residential experience is not appropriate for their children. Some schools and groups want to have a residential visit as they can fit more outdoor learning in and they really value the residential experience of eating together, living together and spending quality time together.
- 10.16. There is strong evidence to support the benefits in providing overnight accommodation for school experience compared to a day visit. Research published by York Consulting in June 2015⁵ sets out the positive impacts of overnight stays and why they create positive outcomes for young people when they return to school. Within the research, these benefits are divided into the following themes:
 - Foster deeper relationships
 - Improve students' resilience, self-confidence and wellbeing
 - Boost cohesion and a sense of belonging
 - Improve students' engagement with learning
 - Improve student's knowledge, skills and understanding
 - Support students' achievement
 - Smooth students' transition experiences
 - Provide opportunities for student leadership, so-design and facilitation
 - Widen and develop pedagogical
- 10.17. The provision of high quality, fit-for-purpose residential accommodation to support the outdoor learning on-site will enable SOLD to offer overnight stays on a year-round basis and is therefore an important enhancement of the site. The provision of permanent residential accommodation will enhance how SOLD can offer learning and development from the site to support the existing outdoor learning already being provided on site.

Accessibility and Inclusivity

10.18. The proposals will also improve SOLD's ability to offer inclusive activities for young people with additional needs as the proposed new buildings will be constructed to meet latest accessible design standards. The facilities will be of a standard to be able to accommodate users with even

⁵ Evaluating Learning Away - Learning Away





- the highest and most complex additional needs. It will also enable increased vulnerable and minority groups to access the facility, which is not currently possible.
- 10.19. Dedicated fully accessible changing rooms with shower and toilet are included with each of the changing areas on lower ground and upper ground. These are provided with level access and the sanitary fittings defined in Building Regulations Part M, known as a Doc M Pack, which include grab rails and shower seat. Within the lower ground changing rooms, the showers include an accessible provision that includes the same Doc M Pack fittings to allow inclusion. If a wheelchair user chose to change with the group, they would be allocated the single gender changing room that has been sized to suit an accessible provision.
- 10.20. The guest residential accommodation is configured into dormitory style bedrooms that accommodate four children within each room sharing an ensuite shower room. Separate bedrooms with ensuite shower rooms are included for the adult guardians. Each residential block also includes a fully accessible bedroom and shower room, with the shower room having managed access from both the bedroom and adjacent social space to reduce travel distances depending where people are within the building.

Economic benefits

- 10.21. There are economic benefits which will be generated as a result of the development. Currently SOLD employ staff through a number of routes including having a fixed team, a seasonal team, use of the Government's Kick-Starter Scheme, Apprenticeships and Special-Needs Apprenticeships. By offering a year-round residential accommodation to support the outdoor learning, this will enable SOLD to provide year-round employment opportunities in addition wider range of employment opportunities which will include not only outdoor instructors but also estates roles, catering and housekeeping. Whilst there will be seasonal work which will be undertaken it is anticipated the number of full time staff on site could increase for 4 currently to 10 and part-time/seasonal staff increase from 26 currently to 34 following the development.
- 10.22. In addition to employment benefits, SOLD also currently offer social opportunities such as Community Payback through engagement and collaboration with Richmond and Kingston Councils.
- 10.23. Although the site does not generate a significant level of employment, employment should still be a consideration as the TYM site does provide employment for a range of jobs which will be retained and could be increased to a more year-round offer as a result of the development.

Aligning with the objectives of MOL

- 10.24. Policy LP13 defines appropriate uses in the MOL to include public and private open spaces and playing fields, open recreation and sport, biodiversity including rivers and bodies of water. As set out in section 2 of this report, the London Plan sets out justification for its Policy G3 which explains that MOL protects and enhances the open environment and improves Londoners' quality of life by providing localities which offer sporting and leisure uses, heritage value, biodiversity, food growing, and health benefits through encouraging walking, running and other physical activity (my emphasis). The justification goes onto explain that proposals to enhance access to MOL and to improve poorer quality areas such that they provide a wider range of benefits for Londoners that are appropriate within MOL will be encouraged. Examples include improved public access for all, inclusive design, recreation facilities, habitat creation, landscaping improvement and flood storage. (my emphasis)
- 10.25. The proposals strongly align with principal purposes of the MOL to provide Londoners (in this case young people) access to nature as a tool for learning about the natural environment along with





improving wellbeing and development and encouraging physical activity within the natural environment, detail of which has been set out earlier in this section of the report. The proposals will not only protect these uses the quality and range of uses of MOL in line with Policy G3 by providing fit-for-purpose facilities which can be used all-year round to maximise the opportunities for young people to benefit for the site.

- 10.26. The proposals will retain this existing use for which only a small number exist within London and no other sites within London provide residential accommodation alongside an early learning provision which make this site even more important for young peoples to be able to access these types of facilities within MOL.
- 10.27. Furthermore, bringing forward the proposals provides an opportunity to improve landscaping and habitats on site but introducing new tree planting, green roofs and additional habitats into the site to create a biodiversity net gain on site.

Conclusion on Development Benefits

10.28. In conclusion, the proposed development will create a large number of benefits for not only Richmond but also the wider London and Surrey around but retaining an enhancing this important site for outdoor learning and supporting residential accommodation. The benefits for young people of having access to outdoor learning, nature and residential stays is well documented and clearly evidenced. These benefits are further amplified in urban areas where it is more challenging for parts of the population to access nature. The benefits of the proposals should carry substantial weight in the planning balance.





11 Any 'Other' Harm

11.1. As required by NPPF Paragraph 148 very special circumstances will not existing unless the potential harm to the Green Belt, and any other harm resulting from the proposal, is clearly outweighed by other considerations. This section considers the 'any other harm' that does not relate to Green Belt openness which should be considered in the planning balance.

Ecology and Biodiversity

- 11.2. The proposals will create an opportunity to enhance the ecological habitats and biodiversity through the development of the site and will secure a biodiversity net gain on the site as part of the development. The most ecologically sensitive areas of the site (such are the habitat to the north of the lake and hedgerow along the south of the site) are being retained to minimise the impact of the proposed development on existing ecological features which has been managed by focusing the majority of development on the previously developed areas of the site. The technical ecological assessment which have been undertaken with the development identify that the development can suitably mitigate any habitat loss on site to ensure no adverse impact on ecology or biodiversity.
- 11.3. The proposals will deliver an 16% increase in biodiversity of site and will enhance the variety of habitats on site through the provision of new tree planting, swales and rain gardens, brown and biodiverse roofs, flowering lawns and areas of wildflower meadows.
- 11.4. The proposals will enhance the ecological features and biodiversity on site and ensure the ecological character of the site is preserved and continues to provide outdoor learning opportunities for children in line with Richmond and GLA policies.

Transport and Parking

- 11.5. The proposals seek to re-provide the existing parking provision on site, however the development will enable the parking and servicing to appropriately planned to meet modern day requirements. The proposals will re-provide the existing 20 parking spaces on site, however the development will enable 5 of these parking spaces to be active electric charging points with an additional 5 spaces identified as passive charging spaces. Of the proposed 20 spaces, 2 will be marked as blue badge spaces. These spaces will be formally marked out and have been tracked to ensure full manoeuvrability around the car parking area.
- 11.6. The development will also provide 20 covered cycle parking spaces including 1 space for adaptable bikes where currently there is no provision so greatly improve the sustainable transport options to the site.
- 11.7. The proposals are supported by a transport statement which includes details of servicing and deliveries, travel plan and outline construction management plan. The report confirms that the number of on-site attendees will remain the same to following the redevelopment as the proposals seek to extend the number of months SOLD can offer residential stays as opposed to significantly intensifying the daily operations on site and will therefore not have a significant adverse impact on the highways network or on highway safety.

Drainage and Flood Risk

11.8. The proposals have enabled the opportunity to improve the flood risk and drainage on site by introducing a number of new sustainable drainage systems into the site to manage surface water flooding and ensure the risk of flooding does not increase on site or elsewhere. The proposals will introduce a new infiltration tank, swale, rain garden and green roofs into the development. This will not only improve the site's drainage but will also contribute towards the





variety of habitats and biodiversity improvements on the site. As a result there will be no harm arising from the proposed development in relation to drainage.

Trees and Landscape

- 11.9. The proposals have been carefully designed to avoid any unnecessary harm to trees and landscaping. Only a small part of a group of trees at the access to the site is proposed for removal to accommodate necessary visibility for highways safety. All other trees are remaining on site to maintain the contribution the existing trees make to the character of the landscape. Tree planting is proposed within the development to enhance the landscape including broad leaf woodland planting, native tree planting and specimen tree planting in different area of the site to enhance the number and variety of trees on the site. This has been set out in the proposed landscape strategy will the full planting specification to be agreed via planning condition. Where development is proposed in proximity to existing trees the necessary tree protection will installed as set out in the Arboricultural Method Statement to ensure there will be no adverse impact on existing trees.
- 11.10. By focusing development on the previously developed parts of the site the proposals have been able to maintain the existing landscape on site and also created opportunities for new planting to enhance the site's landscape compared to existing.

Energy and Sustainability

- 11.11. The proposals will enable the TYM site to become a more sustainable and energy efficient site. The existing buildings with SOLD operates are inefficient and are no longer fit for purpose. The EPC of a number of existing buildings on site is either E or F. The development creates the opportunity to introduce zero and low carbon technologies such as air source heat pumps and photovoltaic panels and remove existing gas boilers from the site. The buildings have also been designed with a fabric first approach to ensure to substantially improve the efficiency of the buildings on site compared to existing operations.
- 11.12. The proposals will achieve a BREEAM 'Excellent' rating demonstrating the significant enhancement in energy efficiency the development will generate as a result of the development.
- 11.13. The proposals will also enhance the carbon reduction of site compared to existing. The design team reviewed the opportunities for the site to become net carbon zero however this would have required an additional circa 120sqm of ground floor mounted PV panels which would have led to the introduction of further development in MOL which was not considered acceptable. The proposals will therefore achieve a carbon reduction with the deficit being provided through a carbon offset contribution in line with Richmond planning policy.

Noise

11.14. The application is supported by a noise impact assessment which included an assessment of potential noise breakout of new activities based on environmental noise surveys which have been undertaken to establish existing ambient noise levels on site as well as representative levels of noise from existing activities on site. The report concludes that the impact of the proposal should be minimal and should equate to no observed adverse impact based on the existing noise climate which includes outdoor activities not relating to SOLD including party boats, surrounding sports pitches and shooting range. The proposals will therefore not lead to harmful impacts in relation to noise.

Conclusions on Any Other Harms

11.15. The proposals are supported by an extensive suite of technical documentation which has demonstrated that the proposals will not lead to any other harms other than the harm to MOL.





In fact, in a number of areas, the proposals will enable a number of benefits to be generated particularly in relation to energy efficiency, sustainable drainage and ecology and landscaping to make the site fit for the future in terms of built development which is requires to support the outdoor learning and development SOLD currently offer on site. By bringing the site up to modern day standards it will ensure the site is retained in the long-term as a viable operation for SCC to continue offering these important facilities to children in Richmond, London and Surrey.





12 Conclusions

- 12.1. Vail Williams LLP has been instructed by SCC to prepare this MOL statement to demonstrated the Very Special Circumstances which justify new development in MOL on the site known as TYM. The proposed development seeks, 'Demolition of existing buildings and construction of replacement buildings with associated residential accommodation, changing block, replacement staff accommodation and outdoor activity equipment including high ropes, climbing wall, coasteering course, supporting pontoons with associated hard and soft landscaping and parking.'
- 12.2. This report has clearly set out the background of the site and SOLD who currently operate the site including their current challenges around with the site's operation which is becoming no longer fit for purpose. Consideration has been given to whether the existing buildings can be refurbished but concluded that the most suitable option is for full redevelopment of the site. No alternative sites have been identified which would be suitable to accommodate the development outside of MOL or Green Belt land and therefore the current TYM is the only site for the proposed development. There has been extensive scrutiny of the design to justify the size and scale of the development to demonstrate that all development being proposed is necessary and does not lead to unnecessary development on MOL.
- 12.3. The report has included an assessment on the impact of development on MOL which concludes whilst the principles of much of the development could be considered appropriate Green Belt development in line with paragraph 149 of the NPPF, as the impact of development needs to be considered as a whole, there will be a small impact on the openness as a result of the development compared to existing development of site. This impact predominantly relates to the requirement to increase the height and scale of the main building to meet SOLD's operational requirements, sustainability requirements, Building Regulations and still achieve good design principles. This harm from the impact on openness must be weighed against the benefits of the scheme in addition to any other harm in line with NPPF requirements. The benefits of the scheme have been summarised below and form the set of very special circumstances:
 - Retention and enhancement of existing outdoor learning and education centre in Richmond to create a high-quality and fit for purpose facility which can be accessed by schools, colleges and community groups in Richmond, London and Surrey.
 - Unique facility within London with no other outdoor activity centres in London offering
 residential accommodation to support the outdoor learning activities which could be
 provide all year round as a result of the development.
 - Provision essential piece of social infrastructure for Richmond, London and Surrey.
 - Provides opportunity for SOLD to offer year-round learning from the site to increase offer to schools, colleges and community groups and provision of year-round residential accommodation to support outdoor learning.
 - Strongly aligns with London Plan policies to improve the health of Londoners' (policy GG3) and access to education, recreation and sport facilities (Policies S3, S4, S5)
 - Strongly aligns with London Plan MOL policy to enhance the quality and range of uses in MOL.





- No alternative sites to provide the development outside MOL/Green Belt location and aligns with Neighbourhood Plan allocation to support community facility within Richmond.
- Significantly improves accessibility to site to ensure inclusivity and accessibility for all.
- Redevelopment of a previously developed site to meet an identified need for outdoor learning/recreational facilities within Richmond.
- Creates an opportunity to enhance the sustainability and environmental credentials of the site.
- 12.4. Based on the technical reports prepared to support the planning application which provides recommendations on suitable mitigation measures to potential harm arising from the development, there is no 'other harm' arising from the development other than the harm of MOL/Green Belt. In line with paragraph 148 of the NPPF this harm is afforded substantial weight in the planning balance.
- 12.5. However, the harm to MOL as a result of the impact on openness is clearly outweighed by the other considerations relating to the social, economic and environmental benefits the scheme will generate as summarised in section 12.3. Therefore, when considered as a whole, the proposals comply with paragraph 148 of the NPPF and Policy LP13 of the Richmond Local Plan as Very Special Circumstances can be demonstrated to justify new development in MOL.



Figure 8 - Visualisation prepared by Pick Everard

MOL Justification Statement Date: October 2022 35





Appendix 1

List of Schools and Groups which have used TYM in 2021/22 (excluding individual TAZ bookings)





Organisation	No. of	Type of visit	Type of Activity being		
	Students	- 71	undertaken on visit		
Meadlands Junior School	33	Residential with	Tepee camping		
		Activities	(April to October		
St Richards Primary School	25	Residential with	only)		
Chase Bridge Primary School	97	Activities Residential with	 Canoeing 		
Chase Bridge Primary School	97	Activities	 Sailing 		
St Agathas Primary School	65	Day Visit			
Darell Primary and Nursery	31	Residential with	Raft building		
School		Activities	 Open water 		
Barnes Primary School	62	Residential with	swimming		
		Activities	Stand Up		
Waldegrave Girls School	60	Day Visit	Paddleboarding		
Waldegrave Girls School	60	Day Visit	Archery		
Waldegrave Girls School	60	Day Visit	• Low ropes course		
Waldegrave Girls School	60	Day Visit	Low ropes course		
St Johns CofE Primary School	36	Day Visit	 Climbing wall 		
Kingston	71	DawWieit	Orienteering		
East Sheen Primary School	71	Day Visit	Woodland		
Chase Bridge Primary School	94	Day Visit	Activities		
Marshgate Primary School German School London	63	Day Visit	• Kovakina		
	61	Day Visit	Kayaking		
Fern Hill Primary School	95	Day Visit	Bell Boating		
Queens CofE Primary School	54	Residential with Activities	Environmental		
Orleans Park School	64	Day Visit	and nature-based		
Orleans Park School	60	Day Visit	activity.		
Orleans Park School	60	Day Visit			
Orleans Park School	64	Day Visit			
Orleans Park School	64	Day Visit			
Orleans Park School	64	Day Visit			
Orleans Park School	64	Day Visit			
Orleans Park School	64	Day Visit			
Orleans Park School	64	Day Visit			
Orleans Park School	64	Day Visit			
Orleans Park School	64	Day Visit			
Orleans Park School	60	Day Visit			
Harrodian School	93	Day Visit			
Canbury School	41	Day Visit			
Canbury School	32	Day Visit			
Deer Park School	34	Residential with Activities			
Surbiton High Girls Prep	56	Day Visit			
		1	<u> </u>		





Surbiton High Girls Prep	56	Day Visit
Turing House School	54	Day Visit
Stanley Primary School	24	Day Visit
Stanley Primary School	43	Day Visit
Stanley Primary School	32	Day Visit
Stanley Primary School	22	Day Visit
Waldegrave Girls School	59	Day Visit
Waldegrave Girls School	59	Day Visit
Waldegrave Girls School	58	Day Visit
Waldegrave Girls School	59	Day Visit
Darell Primary and Nursery	35	Residential with
School		Activities
Surbiton High Girls Prep	2	Meeting and
		Conferences
King Athelstan Primary School	61	Day Visit
Radnor House	9	Programmes
St Richards Primary School	1	Meeting and
		Conferences
St Richards Primary School	3	Meeting and
Daroll Brimary and Nursony	2	Conferences Meeting and
Darell Primary and Nursery School	2	Conferences
Christs School	93	Day Visit
St Richards Primary School	32	Residential with
,	_	Activities
Darell Primary and Nursery	2	Meeting and
School		Conferences
Turing House School	108	Day Visit
Queens CofE Primary School	1	Meeting and
		Conferences
Tiffin Girls School	94	Day Visit
Tiffin Girls School	96	Day Visit
King Athelstan Primary	1	Meeting and Conferences
School Surbiton High Girls Prep	53	Day Visit
Orleans Park School	55 57	Day Visit
Orleans Park School		•
	57 57	Day Visit
Orleans Park School	57	Day Visit
The Russell School	33	Day Visit
St Agathas Primary School	1	Meeting and Conferences
		Contendices





Other London Schools (non-Richmond)							
Grove Park Primary School	66	Residential with Activities					
All Saints Primary School	29	Residential with Activities					
Poplar Primary School	30	External Advice and Development					
Kensington Prep School	48	Day Visit					
All Saints Primary School	30	Residential with Activities					
Hollymount Primary School	65	Day Visit					
Grove Park Primary School	1	Meeting and Conferences					

Surrey Schools				
Surrey Hills CofE Primary School	44	Residential with Activities		
Nutfield Church (CofE) Primary School	29	Residential with Activities		
Nutfield Church (CofE) Primary School	36	Residential with Activities		
Earlswood Junior School	57	Residential with Activities		
Earlswood Junior School	59	Residential with Activities		
St Pauls School Dorking	68	Day Visit		
St Teresas Prep School	49	Day Visit		
East Surrey College	13	Day Visit		
Milford School	18	External Advice and		
		Development		
Earlswood Junior School	2	Meeting and Conferences		
St Peters Catholic School	18	Day Visit		
St Peters Catholic School	18	Day Visit		
Reigate School	17	Day Visit		
Limpsfield Grange School	21	Programmes		
George Abbot Academy	19	Day Visit		





Appendix 2 Alternative Site Assessment



Alternative Site Assessment, North Surrey for Thames Young Mariners Facility

Report date: 24 August 2022



Prepared for:

Surrey County Council Woodhatch Place 11 Cockshot Hill Reigate Surrey RH2 8EF

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Appendix 2	Location Map
Appendix 3	Site Plans
Appendix 4	Schedule of Sites



1 Executive Summary

Instructions

1.1. Our instructions from Surrey County Council (SCC) are to carry out a search for a site suitable to relocate the Thames Young Mariners facility, currently located at Riverside Drive, Richmond TW10 7RX. The existing facilities require upgrading, involving a potential redevelopment. As the existing site lies within Metropolitan Open Land (MOL), it is appropriate to conduct a search to establish whether a more appropriate, alternative site could be used to house a replacement facility which is not located within MOL or the Green Belt.

Search Parameters

- 1.2. Sites in excess of 2 hectares were sought, with access to an area of sheltered water suitable for water sport activity and training for people of all ages and abilities.
- 1.3. The search area is North Surrey and South West London, within a reasonable distance of both the existing site and two other sites operated by SCC for outdoor activities, namely
 - High Ashurst, The Coach House, Headley Ln, Mickleham, Dorking RH5 6DQ
 - Henley Fort Outdoor Education Centre, The Mount, Guildford GU2 4RH
- 1.4. We have considered sites both off and on market with a range of ownership types, uses, access/location arrangements and sizes.

Methodology

- 1.5. A comprehensive search was carried out during July 2022.
- 1.6. In order to maximise the response and to gain all opportunities the search was deliberately wideranging in terms of site specification and location, albeit focusing on the north Surrey region.
- 1.7. This report excludes site visits and therefore a desktop exercise has been undertaken.
- 1.8. In order to extend out to the wider market Vail Williams undertook the following;
 - Production of a Requirement Circular (Appendix 1) which was published to the market and sent to land and commercial agents via Agents Insight, a leading industry online platform which provides agency teams to place properties and search requirements across the UK.
 - Liaison with all local estate and land agents within the search to seek out any opportunities
 - Search of online market listings through online search portals Right Move, EG Property Link and Zoopla.
 - Land investigations using online digital mapping tools and land ownership database software known as 'LandInsight', which enables sites to be found and assessed off market.



Results

- 1.9. Our report includes a map at **Appendix 2** showing the approximate location of each identified site. Aerial photographs of each site are included as **Appendix 3**, with a summary table set out as **Appendix 4**.
- 1.10. Within this table we have commented on their deliverability based on location, size and whether sites are deliverable within a suitable timescale.
- 1.11. We have adopted RAG (Red-Amber-Green) rating, to summarise each site, where green denotes a 'favourable' site, red an 'unfavourable' value and amber a 'neutral' value.
- 1.12. We have not identified any "green" sites, being those that are readily deliverable and demonstrably superior in terms of the key planning constraints of Green Belt, brownfield land and flood risk. The existing Thames Young Mariners site near Richmond is designated Metropolitan Open Land, but contains existing buildings, so is a brownfield site. The proposed development land at the existing site also lies within Flood Zone 1.
- 1.13. Our search has not identified any suitable sites currently on the market to buy or lease within, or close to, the preferred search area of north-west Surrey.
- 1.14. Due to the specific requirements of the search, the number of deliverable options are very limited. Taking into account ownership and ability to acquire, together with the size, access, planning and location requirements, there is, at best, only one possible option at Manor Lake/Thorpe Farm. This site is identified "amber" because it is only partially within the Green Belt (whereas every other site is entirely Green Belt) and is part brownfield.
- 1.15. The Manor Lake site is partially within flood zones 2 and 3, so it is inferior to the existing Thames Young Mariners site in this respect. Furthermore, it is not readily available noting that part of the water space is owned by an adjacent developer of a high-end retirement village scheme, which would be sure to object to a proposal for a children's activity centre next door.
- 1.16. Our conclusion is, therefore, that there is no other site within a reasonable search area that is more suited to development than the existing Thames Young Mariners facility.

2 Search Parameters

- 2.1. Our instructions are to identify potential sites suitable for use or development as an outdoor activities and watersports centre, suitable for people of all ages and abilities.
- 2.2. The facility would replace the existing Thames Young Mariners site near Richmond, so it is important that any replacement site should be within a reasonable distance, covering the same catchment population as the existing.
- 2.3. We have therefore carried out a search of the market for a site based on the following criteria:
 - Minimum 2 hectare (5 acre) site
 - Buildings (existing or potential to develop) totalling a minimum of 2,000 square metres (21,500 square feet)

Date: August 2022

• Water access – the site must adjoin a water course (lake or river) suitable for watersport activity and training for people of all ages and abilities.



- Building uses to include teaching, dining/kitchens, changing, dry storage and accommodation for school residential trips
- Freehold or long leasehold this is considered essential in view of the substantial capital investment that the client will be making to adapt and develop a site. This would not be sustainable on a short-term leasehold tenure.
- 2.4. We have searched for sites that are currently available to purchase, either on or off market. We have also undertaken a search of potentially suitable sites that are not currently offered for sale, in order to ensure that all possible options are properly considered.
- 2.5. Existing water storage reservoirs have been discounted as unsuitable. Their design tends to be concrete lined, deep water with steep sides. This is not conducive to watersport use by more vulnerable users. It may be OK for experienced dinghy sailors, but not younger children and disabled users. Also, the existing use means they will not be made available by a water company to purchase or take a long lease sufficient to facilitate the development of a long-term water sports facility.
- 2.6. We have also discounted sites that only have access to flowing river water which, again, is not considered suitable for all ages and abilities. The existing site adjoins the River Thames which may be suitable for older users and more confident swimmers to undertake some activities, such as kayaking. A river is not appropriate for younger and/or disabled users, it is also unsuitable for general swimming or other water borne team-building activities irrespective of age or ability. The river is liable to strong currents and, downstream of Teddington Lock, tidal movements, both of which create significant potential danger to swimmers.
- 2.7. The fully tidal Thames, downstream of the half-tide lock and weir at Richmond, is only suitable for highly experienced sailors, rowers, etc. The Thames has a high tidal range which creates very strong currents. It is also a commercial river, used by a variety of large boats. For these reasons, any sites downstream of Richmond half tide lock are not considered suitable for the proposed use.
- 2.8. For the above reasons, our search focusses on sites that include an area of sheltered, enclosed water with gradually sloping banks and shallow areas that might be suitable or adaptable for users of all ages and abilities.

3 Methodology

- 3.1. The search was undertaken during the course of July 2022 by Ian Froome, Partner and commercial property surveyor with particular expertise in marine-based leisure property.
- 3.2. The assessment of sites was undertaken by Ian Froome and Sarah Isherwood, an Associate based within Vail Williams' Surrey Planning team.
- 3.3. Vail Williams is one of the major property consultancies within the south east.
- 3.4. The search has been carried out on a desktop basis and has relied upon local knowledge, active investigations of the market and online property database/mapping software. Indicative locations of the identified sites are set out on a map at **Appendix 2.**

Date: August 2022

3.5. Vail Williams considered a broad cross section of sites;



Broad cross section site search

- Privately owned sites
- Sites on the open market (for sale / to let)
- Sites off the market
- Sites occupied, part occupied and vacant
- Open lakes and ponds, with land around suitable for development
- 3.6. Our search was undertaken in three phases:

Phase 1 - Requirement Circular

- 3.7. Included at **Appendix 1** is a copy of the Search Requirement. The Circular was published via online agent databases/subscriptions and emailed to relevant agents including commercial, development and estate agents based locally, regionally and in London. Requirement Circulars are recognised in the market as a standard part of a commercial site/property market search, reach a wide range of agents and generally see a good level of response.
- 3.8. In this case, however, no responses were received. This is not wholly surprising given the highly specialised nature of the site search. Water sport facilities (or lakes suitable for such uses) are very rarely offered for sale in the open market.

Phase 2 - Market Search

- 3.9. Our search included an investigation of all listings/marketing websites relating to the search area. Clearly only available 'on market' options would be identified this way. Once again, no suitable options were found currently on the market within the search area.
- 3.10. We have furthermore liaised with relevant commercial and estate agents to follow up leads and probe for 'off market' opportunities.

Phase 3 - Ownership Search

- 3.11. Given the specific nature of the property requirement, the response to our Circular and market investigations was limited. It was therefore necessary to explore further 'off market' options, albeit that these would require further examination and, in many cases, approaches to owners in order to secure.
- 3.12. Our 'off market' search utilised online databases and software including: -
 - Promap, OS mapping software
 - Land Insight
 - Google Maps
- 3.13. These platforms were used to identify sites in the search area based on tenure/ownership and from an aerial view, and also to measure areas and check immediate surroundings.



4 Sites Identified

- 4.1. The results of our search are listed in the below table (Appendix 4). Further information is available at Appendix 3 where we include an aerial photo with an indicative outline of each site identified.
- 4.2. For each site we include an address with postcode (where possible) and have measured its approximate size using digital mapping software.
- 4.3. We have provided comment on the general nature of each site and its potential physical suitability. We also include ownership information, where this can be obtained from publicly available sources. In some cases, particularly sites owned by private individuals, this information is not available.

5 Conclusion

- 5.1. The table (Appendix 4) sets out detail in relation to deliverability of each site, and we will not repeat those findings here.
- 5.2. Our search results reviewed a total of 16 sites which were considered worthy of investigation, due mainly to the presence of sheltered water.
- 5.3. Existing water storage reservoirs have been discounted as unsuitable. Their design tends to be concrete lined, deep water with steep sides. This is not conducive to watersport use by more vulnerable users. It may be OK for experienced dinghy sailors, but not younger children and disabled users. Also, the existing use means they will not be made available by a water company to purchase or take a long lease sufficient to enable building development.
- 5.4. No suitable sites came back from our Agents Circular which demonstrates at this stage a lack of available land/water opportunities on the market in the search area.
- 5.5. Our search has uncovered very few potentially suitable sites. Whilst a small number of sites are identified as being suitable in regard to location and size, the availability of these sites is highly questionable. None are openly available for sale and closer research reveals that they are no more suitable, in terms of planning and environmental constraints, than the existing Thames Young Mariners site which, although within the Green Belt, is an existing brown field site. The proposed development land at the existing site also lies within Flood Zone 1.
- 5.6. Our search has not identified any suitable sites currently on the market to buy or lease within, or close to, the preferred search area of north-west Surrey. Furthermore, we have not identified any sites, not on the market, that are demonstrably superior to the existing site, in terms of the key planning constraints of Green Belt, brownfield land and flood risk.
- 5.7. Due to the specific requirements of the search, the number of deliverable options are very limited. Taking into account ownership and ability to acquire, together with the size, access, planning and location requirements, there is, at best, only one possible option at Manor Lake/Thorpe Farm. This site is identified "amber" because it is only partially within the Green Belt (whereas every other site is entirely Green Belt) and is part brownfield.

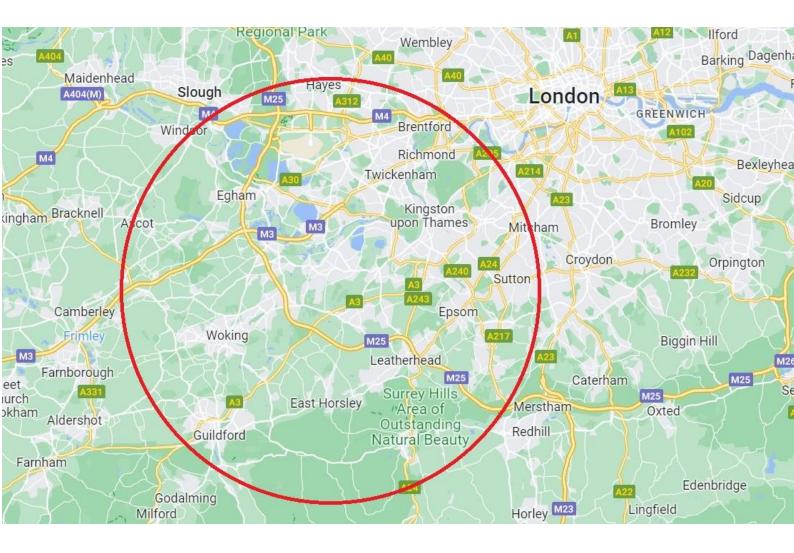


- 5.8. The Manor Lake site is partially within flood zones 2 and 3, so it is inferior to the existing Thames Young Mariners site in this respect. Furthermore, it is not readily available noting that part of the water space is owned by an adjacent developer of a high-end retirement village scheme, which would be sure to object to a proposal for a children's activity centre next door.
- 5.9. Our conclusion, therefore, is that the existing Thames Young Mariners site remains the most suitable location for this use, in terms of deliverability, as well as planning and environmental constraints.
- 5.10. If any further comment is required on any of the other options, or more detailed investigation into those opportunities and approaches to owners, we will be pleased to assist.



Appendix 1Requirement Circular





CLIENT REQUIREMENT

Outdoor Activities and Watersports Centre

Details to: lan Froome

07836 256872

ifroome@vailwilliams.com

- Minimum 2 hectare (5 acre) site
- Buildings (existing or potential to develop) totalling a minimum of 2,000 sq.m (21,500 sq.ft)
- Water access the site must adjoin a water course (lake or river) suitable for watersport activity and training for people of all ages and abilities.
- Building uses to include teaching, dining/kitchens, changing, dry storage and accommodation for school residential trips
- · Freehold or long leasehold
- Preferred location is north Surrey/SW London

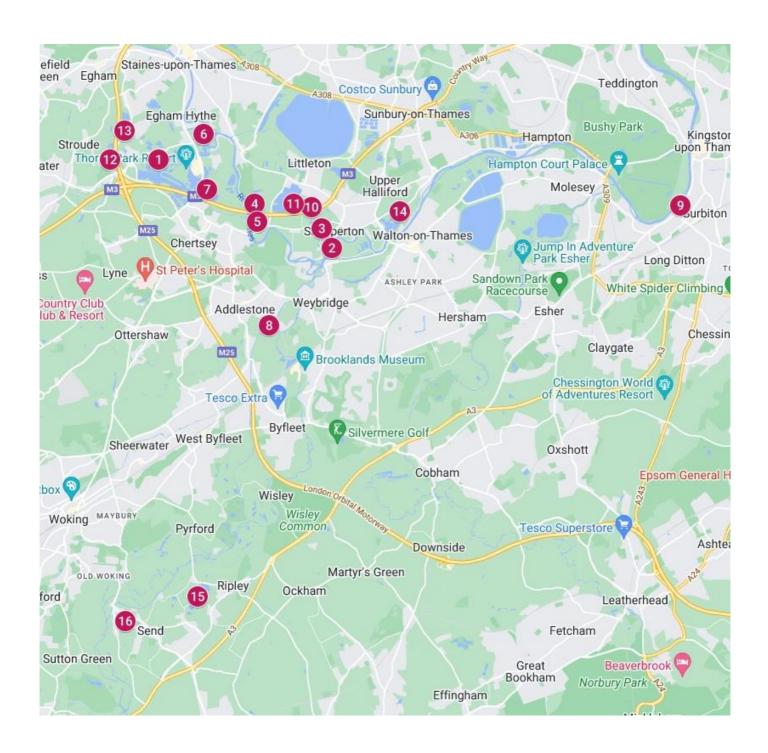


Appendix 2Location Map

The identified sites are numbered on the map as follows

- 1. Manor Lake & Thorpe Farm, Thorpe Park Resort, Staines Road, Chertsey KT16 8PN
- 2. Lake at Ferry Road, Shepperton TW17 9LH
- 3. Halliford Mere, Chertsey Road, Shepperton TW17 9NN
- 4. Spelthorne Water Ski Club Lake, Thameside, Staines, Chertsey KT16 8LD
- 5. Lake south of M3 at Thameside, Laleham, Chertsey KT16 8LF
- 6. Lake at Penton Hook Marina, Staines Road, Chertsey KT16 8PY
- 7. Abbey Meads Lakes, Staines Road, Chertsey KT16 8PU
- 8. Mill Pond adjacent Coxes Lock, River Wey, Addlestone KT15 2JX
- 9. Seething Wells Filter Beds, Portsmouth Road, Thames Ditton KT6 4HJ
- 10. Sheepwalk Lake, Sheep Walk Lane, Shepperton TW17 0AN
- 11. Lakes at Littleton Lane, Shepperton TW17 ONF
- 12. Longside Lake, Egham TW20 8FA
- 13. Thorpe Lea Road, Egham TW20 8LH
- 14. Ashmere Fisheries, Felix Road, Shepperton TW17 8NN
- 15. Ripleys Pond, Polesden Lane, Ripley GU23 6JX
- 16. Send Lakes, Potters Lane, Send GU23 7AJ







Appendix 3Site Plans



Manor Lake & Thorpe Farm, Thorpe Park Resort, Staines Road, Chertsey KT16 8PN





Lake at Ferry Road, Shepperton TW17 9LH





Halliford Mere, Chertsey Road, Shepperton TW17 9NN





Spelthorne Water Ski Club Lake, Thameside, Staines, Chertsey KT16 8LD





Lake south of M3 at Thameside, Laleham, Chertsey KT16 8LF





Lake at Penton Hook Marina, Staines Road, Chertsey KT16 8PY





Abbey Meads Lakes, Staines Road, Chertsey KT16 8PU





Mill Pond adjacent Coxes Lock, River Wey, Addlestone KT15 2JX





Seething Wells Filter Beds, Portsmouth Road, Thames Ditton KT6 4HJ





Sheepwalk Lake, Sheep Walk Lane, Shepperton TW17 0AN





Lakes at Littleton Lane, Shepperton TW17 ONF





Longside Lake, Egham TW20 8FA





Thorpe Lea Road, Egham TW20 8LH





Ashmere Fisheries, Felix Road, Shepperton TW17 8NN





Ripleys Pond, Polesden Lane, Ripley GU23 6JX





Send Lakes, Potters Lane, Send GU23 7AJ





Appendix 4Schedule of Sites

Thames Young Mariners – alternative site options

Key characteristics:

- Sheltered water suitable for watersports for all ages and abilities. This requires a lake or similar body of still water, a river alone will not suffice as unsuitable for children and disabled participants in particular, due to currents, etc.
- Minimum 2 hectares land area
- Buildings (or ability to construct) minimum 2,000 square metres

Existing water storage reservoirs have been discounted as clearly unsuitable. Their design tends to be concrete lined, deep water with steep sides. This is not conducive to watersport use by more vulnerable users. It may be OK for experienced dinghy sailors, but not younger children and disabled users. Also, the existing use means they will not be made available by a water company to purchase or take a long lease sufficient to enable building development.

NOTE THAT NONE OF THESE SITES ARE CURRENTLY AVAILABLE TO BUY OR LEASE ON THE OPEN MARKET

Site Location/Address	Approx site area:	Approx site area:	Characteristics	Ownership	Current Use	Planning constraints /	Suitability
	land only	water space only				opportunities	
Manor Lake & Thorpe	7.0 ha	16.0 ha	Lakes surrounding a large theme park. The	Merlin Attractions	Theme park,	Partially within the Green	The site contains a number of areas of
Farm, Thorpe Park			southern lakes comprise Thorpe Lakes	Ltd,	powered water	Belt	flood zone 1, 2 and 3.
Resort, Staines Road,			Watersports, laid out for water skiing and		sports	Part brownfield/part	
Chertsey KT16 8PN			other powered watersports, these lakes are	Part of the water		greenfield	The site is owned by Merlin
			discounted.	space is owned by			Attractions as part of the Thorpe Park
			The north lakes surround the Thorpe Park	Eden (Thorpe) Ltd			operations so we would question
			theme park, also discounted as obviously	(Sandars			deliverability of an alternative use if
			unsuitable.	Developers)			the owners of Thorpe Park may want
			This assessment concerns only Manor Lake,				to retain the site for future uses
			to the north west of the site, this lake				associated with the theme park.
			appears to be unused. Land to the west				
			comprises Thorpe Farm, developed in the				May be suitable subject to availability.
			1980's as a themed farm but now closed to				
			the public.				The adjacent Sandars residential
			Land to the north comprises former Cemex				development may conflict – they own
			offices, now being redeveloped as a high-end				part of the water and may resist noisy
			retirement living complex (The Sandars).				children's activities next to their high-
							end retirement village.
							Delivery is therefore uncertain
Lake at Farm, Dood	8.3 ha	10.4 ha	Laws discussed support with alawaside a Thereas	Halmanna haliana	Lineite detemore ente	Green Belt	Delivery is therefore uncertain. The entire site is located within flood
Lake at Ferry Road, Shepperton TW17 9LH	8.3 Nd	10.4 na	Large disused gravel pit alongside a Thames meander. Desborough Sailing Club premises	Unknown, believe privately owned	Limited watersports	Greenfield	zone 3.
Shepperton TW17 9LH			adjoin to the north east, undeveloped land to	privately owned	use, including open water swimming	Greenileid	zone 3.
			the north and north west.		water swimming		Development would involve tree
			the north and north west.				clearance to create sufficient land for
							new buildings.
							new buildings.
Halliford Mere, Chertsey	7.6 ha	Four lakes:	Group of linked lakes with heavily wooded	Unknown	Restaurant, fishing	Green Belt	Other than a strip of land along
Road, Shepperton TW17		1.3 ha	surrounds. Restaurant building and fishing		lakes and amenity	Greenfield	Renfree Way, the remaining site is
9NN		1.5 ha	club at one end, remainder is undeveloped.				located within flood zone 2 and 3 and
		1.6 ha	Assumed to be former gravel workings.				therefore unsuitable for overnight
		0.4 ha					accommodation unless there are no
							sites available in a lower flood risk
		Total water area					area.
		4.8 ha					
							Given the layout, it is likely to be
							difficult to accommodate the

							necessary land based activities and supporting overnight accommodation within the site boundary. If there were space to accommodate necessary development, would involve tree clearance to create sufficient land for new buildings. The site ownership is currently unknown so it cannot be confirmed whether the site would be leased or sold for an alternative use.
Spelthorne Water Ski Club Lake, Thameside, Staines, Chertsey KT16 8LD	14.8 ha	21.4 ha	Former gravel pit north of the M3 and east of the River Thames, road access is via Thames Side to the west, but most of the land is to the east of the lake, possibly accessible from Littleton Lane. To the east of the lake is the Littleton Industrial Estate which appears to comprise the former gravel working compound now repurposed for general industrial uses. The industrial estate is excluded from this assessment.	Brett Aggregates	Water ski lake, Unused land to the east (excluding the industrial estate)	Green Belt Restored brownfield land but free from development.	Adjacent industrial estate appears to host B2 uses which may conflict with proposed use. The whole site is located within flood zone 3 and therefore unsuitable in the flood risk hierarchy when sites in a lower flood risk area are available.
Lake south of M3 at Thameside, Laleham, Chertsey KT16 8LF	8.0 ha	4.9 ha	Former gravel pit immediately south of M3 motorway. Mobile home park to the west, the SCC owned Littleton Lane Traveller Site lies to the east. There are mixed business uses to the south fronting Chertsey Bridge Road.	Brett Aggregates	Appears unused	Green belt Greenfield	The contains no brownfield areas so development would be on areas which have not been previously developed. Noise and air quality matters would need to be investigated due to proximity to the M3. The site is predominantly within flood zone 3 with the remaining land in flood zone 2. Not suitable due to flood risk and greenfield classification.
Lake at Penton Hook Marina, Staines Road, Chertsey KT16 8PY	6.5 ha	9.8 ha	Unused lake to the north of the leisure boat marina. Housing to the north and east, the main land area is to the south west.	MDL Marinas	Unused land and water space alongside a marina	Green belt Greenfield	The contains no brownfield areas so development would be on areas which have not been previously developed. The site is predominantly within flood zone 3 with the remaining land in flood zone 2. Not suitable due to flood risk and greenfield classification.

Abbey Meads Lakes, Staines Road, Chertsey KT16 8PU	North site: 19.3 ha South site: 3.5 ha	North lake: 9.4 ha South lake: 6.1 ha	Two former gravel pits north of the M3 motorway, divided by the Abbey River. Largely wooded banks. Appears to be owned by Thorpe Park operators.	Merlin Attractions	Model boat sailing, otherwise unused	Green belt Greenfield	The site is predominantly within flood zone 3 with the remaining land in flood zone 2. Predominantly greenfield site with a number of areas of the site wooded particularly around the waters edge. Whilst a survey has not been undertaken it is expected that tree removal will be required to accommodate development and get accessible access to the water. Development needed on currently undeveloped land. Not suitable due to flood risk, expected tree removal required and greenfield classification.
Mill Pond adjacent Coxes Lock, River Wey, Addlestone KT15 2JX	0.4 ha	2.9 ha	Large holding pond upstream of an old mill, housing to the north, trees, farmland and meadows to west and south.	National Trust	Unused/amenity	Green Belt Greenfield	Unsuitable Insufficient land for buildings and non-water activities and required camping and overnight accommodation to support outdoor learning
Seething Wells Filter Beds, Portsmouth Road, Thames Ditton KT6 4HJ	0.8 ha	4.6 ha	Old water filter beds, now disused. Urban setting, heavily engineered setting would need major alterations to make suitable, if at all.	Cascina Ltd	Unused	Metropolitan Open Space Brown field	Unsuitable Insufficient land for buildings and non-water activities and required camping and overnight accommodation to support outdoor learning.
Sheepwalk Lake, Sheep Walk Lane, Shepperton TW17 OAN	4.5 ha	4.5 ha	Former gravel pit immediately north of the M3 and south of Sheep Walk. Housing to the north, otherwise hemmed in by roads & motorway	Surrey County Council	Appears unused	Green Belt Greenfield	Unsuitable Site which surround the lake is fully greenfield and contains extensive areas of established trees and landscaping which would need to be cleared to accommodate development. Air quality and noise matters would need to be investigated and mitigated due to proximity to M3. The site is within flood zone 2 and 3. Discounted due to greenfield classification, potential impact of the tree/habitat loss and flood risk.

Lakes at Littleton Lane, Shepperton TW17 ONF	6.3 ha	Sailing club lake: 39 ha Three other lakes: 8.2 ha 2.6 ha 1.9 ha	Linked series of old gravel pits, to the east of Littleton Lane and west of Sheep Walk. M3 to the south and housing to the north. The main lake is used by Littleton Sailing Club, formerly a division of the Civil Service Sailing Association	Part Surrey County Council Part Civil Service Sports Council Part unknown	Sailing club in main lake. Remaining lakes appear unused	Green Belt Mostly greenfield, save for sailing club compound and clubhouse	Unsuitable Whilst land area is extensive, it is mostly narrow strips of land around each lake, so there is no single plot suitable for the necessary buildings to meet SOLD's requirement for land-based activities and supporting residential accommodation. The site is almost entirely within flood zone 3. Discounted due to flood risk and lack of land around lakes to accommodate development.
Longside lake, Egham TW20 8FA	7.2 ha	16.2 ha	Lake to the west of the M25, north of Thorpe Green. Road access via drive and bridge over M25 from B388 Thorpe Bypass. Land around the lake is heavily wooded, the adjacent rough ground is owned by others (ownership is not known.)	Lafarge Aggregates	Powered watersports (Longside Lake Watersports)	Green Belt Greenfield site	Unsuitable. The area around the lake is located in flood zone 1. Whilst a sizeable land area, it is almost entirely wooded, in a narrow strip around the lake, with no obvious location for the sizeable buildings required. Also noise and air quality impacts would need to be investigated and appropriately mitigated due to proximity to M25 and M3. Discounted due to greenfield nature, loss of trees/habitat to accommodate development and greenfield classification.
Thorpe Lea Road, Egham TW20 8LH	2.0 ha	4.6 ha	Modestly sized lake to the NW of Thorpe Lea Road. Lies to the south of Thorpe Lea Fishery, which is not considered as it is an established carp fishery so would not be available. This pond is surrounded by partly wooded, and partly open ground.	Not known	Believed to be unused	Green Belt Greenfield site	Unsuitable. Whilst sufficient overall site size, the water area is considered too small for the requirements. Also noise and air quality impacts would need to be investigated and appropriately mitigated due to proximity to M25. Discounted due to size and greenfield classification.

Ashmere Fisheries, Felix Road, Shepperton TW17 8NN	4.3 ha	North lake: 5.2 ha South lake: 1.2 ha	Two gravel pits east of Felix Land, south of Fordbridge Road. To the west is Shepperton Marina and to the east is Fordbridge Park, mobile home park. The land around each lake is heavily wooded.	Not known	Fishing lakes	Green belt Greenfield site	Unsuitable. Fishing lake use means availability is unlikely. The heavily wooded nature of the site means insufficient clear land for the required building development.
Ripleys Pond, Polesden Lane, Ripley GU23 6JX	12.4 ha	16.5 ha	Owned by Papercourt Sailing Club. Large, tree-lined lake with soft banks. Roads along N and W sides, farmland to E and South.	Papercourt Sailing Club	Dinghy sailing lake	Green belt	Unsuitable. Currently in use by a sizeable sailing club, which would cease to exist if they sold the lake, so discounted through lack of availability.
Send Lakes, Potters Lane, Send GU23 7AJ	2.6 ha	6.2 ha	Gravel pits to the east of Potters Lane and south of A247 Send Road, now used as fishing lakes. Road frontages comprise ribbon housing development, so little usable land around the lakes. Single drive access from Potters Lane	Ownership not known. Used by Woking & District Angling Association.	Fishing lakes	Green belt Greenfield site	Unsuitable. The site is within flood zone 1. Fishing lake use means availability is unlikely. Limited land area, to accommodate required development of land-based activities and supporting residential accommodation. Mostly heavily wooded. Also road access is compromised between houses. Discounted due to lack of land available for development, greenfield classification and potential tree/habitat loss to accommodate development.



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