



GERALDEVE



Stag Brewery, Mortlake

Open Space and Playing Pitches Assessment

For Reselton Properties

March 2022



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The Former Stag Brewery, Mortlake

Reselton Properties Limited

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Contents

Page Appendices

<ol style="list-style-type: none"> 1. Executive Summary 3 2. Introduction 7 3. Existing Situation 14 4. Adopted Stag Brewery Planning Brief 16 5. Implications of Requiring a New Secondary School 19 6. Relevant Planning Policy: Open Space 31 7. Assessment: Open Space (Main Site) 34 8. Relevant Planning Policy: Play / Sports Provision 47 9. Assessment: Sports and Playing Pitch Provision 50 10. Conclusion 58 	<ol style="list-style-type: none"> 1 Existing situation 2 LBRuT's indicative vision plan 3 Squire and Partners' version of vision plan 4 Vision plan: Development on playing fields 5 Education Funding Authority correspondence 6 Primary school space requirements 7 Secondary school Option 1 (school to the south) 8 Secondary school Option 2 (school to the west) 9 Secondary school Option 3 (school to the north) – Plans A, B and C 10 Option 3: iterative design process diagrams 11 Secondary school Option 4 (school to the east) 12 Secondary school Option 4 amended 13 Masterplan proposal 14 3G/artificial play surface photographs 15 Gillespies' Amenity Space and Green Space Calculation Sketchbook 701, including Comparison Table 16 SLC Briefing Paper (including draft Community Use Agreement).
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1. Executive Summary

- 1.1 This Open Space and Playing Pitches Assessment (OSPPA) has been prepared by Gerald Eve LLP in support of the Stag Brewery planning applications relating to the proposed redevelopment of the site.
- 1.2 The redevelopment proposal involves development on the existing private playing fields at the site which raises planning policy considerations in respect of the loss of designated open space (Other Open Land of Townscape Importance – OOLTI) and the loss of existing sports playing pitches.
- 1.3 This report updates previous reports submitted in support of the refused GLA Application as well as earlier iterations of the scheme. In undertaking this review, a number of errors were identified in earlier iterations. These have been corrected and identified in Appendix 15 for consistency and to provide an accurate comparison with this new Application scheme.

Existing Situation

- 1.4 The existing playing fields accommodate two youth-sized football pitches, originally used by workers at the Stag Brewery site. The pitches are in private ownership with no authorised access by the general public. Whilst used by a local football club and local schools, the pitches are under-utilised (used for approximately 30% of the year) only.

Stag Brewery Planning Brief (SBPB)

- 1.5 The adopted SBPB provides guidance (not policy) and is now over 10 years old. It proposed the retention of most of the existing playing fields as part of any redevelopment, with a small primary school. It did not take account for the need for external play space associated with a primary school, and assumed this would be provided by the existing playing fields. The Education and Skills Funding Authority (ESFA) has confirmed that external play facilities for any school must be of a robust and hard-wearing surface to cater for the intensive use; grass is not acceptable.

Site Allocation SA24

- 1.6 The Site allocation for the Site (SA24) within the LBRuT Local Plan (2018 as amended) requires any redevelopment proposals to consider the playing fields in the south west corner of the site, which are designated Other Open Land of Townscape Importance (OOLTI), should be retained and/or reprovided and upgraded. In the event of reprovision and upgrading, where a comprehensive approach to redevelopment can be taken in line with policy LP 14, it may be acceptable to re-distribute designated OOLTI within the site, provided that the new open area is equivalent or improved in terms of quantum, quality and openness. In addition, reprovision and upgrading of the playing fields within the site for sport uses has to be carried out in line with policy LP 31, the NPPF and Sport England Policy.

Implications of Requiring a New Secondary School

- 1.7 A Cabinet decision was taken in mid-October 2015 to amend the education requirement for the site from a two-form entry primary school to a six-form entry secondary school, plus sixth form (approximately 1,200 pupils). Final bids for site purchase were submitted on 23 September, in advance of the Cabinet meeting.
- 1.8 Whilst Cabinet approved the change in the brief, there have been no changes to the SBPB document, nor are there any adopted policies confirming the secondary school requirement.
- 1.9 A number of locations have been considered and assessed for the new secondary school requirement, with the starting consideration being the original location for the smaller primary school, to the north of the existing playing fields on the western part of the site. All options considered involve the loss of the existing playing fields (to accommodate the larger area required, and to meet requirements for external school play space).
- 1.10 Options with the school located to the north, east, south and west of the area occupied by the existing playing fields have been considered. This analysis and assessment has identified an optimum solution of locating the school on the eastern part of the playing fields. Section 5 of this OSPPA explains the rationale for this decision, the significant benefits of this option and the constraints and problems associated with

the other options which have now been discounted. Under the preferred option, the quantum of built development proposed on the current playing fields is approximately 0.2ha. This school location option most closely represents the SBPB vision.

- 1.11 The proposed location for the school is optimum, acceptable in planning terms having regard to all relevant material considerations, and would deliver significant planning benefits.

Open Space

- 1.12 The existing playing fields are designated under local policy as OOLTI. Policies seek to protect, but allow for re-provision in particular circumstances. Section 6 explains the full details of the relevant policies and the circumstances in which re-provision may be acceptable.
- 1.13 The proposal qualifies, under Local Plan policy, as one where it is appropriate to consider re-distribution of open space. The re-distribution proposed meets the policy tests relating to quantum, quality and openness. A significant amount of open space (OOLTI qualifying), the vast majority of which will also be fully accessible to the public, is proposed as part of the masterplan development, far in excess of the existing open space or open space envisaged in the adopted SBPB. Award winning landscape architects Gillespies have designed the landscape proposals for the masterplan and the application submission documentation demonstrates the quality of the landscape proposed.

Play / Sports Provision

- 1.14 Planning policies at all levels seek to protect existing sports and play facilities. However, the NPPF, emerging Richmond Local Plan and Sport England policy allow for the loss of existing facilities if it can be demonstrated that they would be replaced by new facilities that would have sufficient sporting benefits to outweigh the loss. The proposal has been tested against Sport England Exception Test E5, as detailed in sections 9 and 10 of this report.
- 1.15 SLC Consulting have been appointed to advise on all matters relating to sports and play facilities and have prepared a Briefing Paper which is appended to this document.

The SLC Paper concludes that the proposal would provide substantial sporting benefits which should provide sufficient benefit from a sporting perspective to outweigh the detriment caused by the loss of the existing playing fields.

- 1.16 Consequently, the Sport England Exception Test is satisfied in this instance, and the proposals are acceptable, in planning terms, having regard to sports and play space. The sporting benefits that the redevelopment would secure are numerous and set out in detail in section 10 of this OSPPA. A key benefit is the increased use and participation that the redevelopment would deliver, and the range of sports that could be played.

Conclusion

- 1.17 The proposal has been assessed against policies which require protection of open space and existing sports facilities, and development involving their loss will only be acceptable if specific criteria can be demonstrated.
- 1.18 All criteria relating to both open space and sports facilities are satisfied by the proposals. The redevelopment would provide a greater amount and quality of open space (which would be OOLTI compliant) and would deliver facilities that would have significant sporting benefits to outweigh the loss of the existing, private and under-utilised sports pitches. For these reasons, and those summarised in section 11, the proposals are acceptable in all relevant respects.

2. Introduction

- 2.1 This Open Space and Playing Pitches Assessment (OSPPA) has been prepared by Gerald Eve LLP on behalf of Reselton Properties Limited (“the Applicant”) in support of two linked planning applications (“the Applications”) for the comprehensive redevelopment of the former Stag Brewery Site in Mortlake (“the Site”) within the London Borough of Richmond upon Thames (LBRuT.

Proposals

- 2.2 The Applications seek planning permission for:

Application A:

“Hybrid application to include the demolition of existing buildings to allow for comprehensive phased redevelopment of the site:

Planning permission is sought in detail for works to the east side of Ship Lane which comprise:

- a) **Demolition of existing buildings (except the Maltings and the façade of the Bottling Plant and former Hotel), walls, associated structures, site clearance and groundworks**
- b) **Alterations and extensions to existing buildings and erection of buildings varying in height from 3 to 9 storeys plus a basement of one to two storeys below ground**
- c) **Residential apartments**
- d) **Flexible use floorspace for:**
 - i. **Retail, financial and professional services, café/restaurant and drinking establishment uses**
 - ii. **Offices**
 - iii. **Non-residential institutions and community use**
 - iv. **Boathouse**

- e) **Hotel / public house with accommodation**
- f) **Cinema**
- g) **Offices**
- h) **New pedestrian, vehicle and cycle accesses and internal routes, and associated highway works**
- i) **Provision of on-site cycle, vehicle and servicing parking at surface and basement level**
- j) **Provision of public open space, amenity and play space and landscaping**
- k) **Flood defence and towpath works**
- l) **Installation of plant and energy equipment**

Planning permission is also sought in outline with all matters reserved for works to the west of Ship Lane which comprise:

- a) **The erection of a single storey basement and buildings varying in height from 3 to 8 storeys**
- b) **Residential development**
- c) **Provision of on-site cycle, vehicle and servicing parking**
- d) **Provision of public open space, amenity and play space and landscaping**
- e) **New pedestrian, vehicle and cycle accesses and internal routes, and associated highways works”**

Application B:

“Detailed planning permission for the erection of a three-storey building to provide a new secondary school with sixth form; sports pitch with floodlighting, external MUGA and play space; and associated external works including landscaping, car and cycle parking, new access routes and other associated works”

2.3 Together, Applications A and B described above comprise the 'Proposed Development'.

Background to Submission

2.4 The current applications follow earlier planning applications which were refused by the Greater London Authority and the GLA. The refused applications were for:

a) Application A – hybrid planning application for comprehensive mixed-use redevelopment of the former Stag Brewery site consisting of:

- i. Land to the east of Ship Lane applied for in detail (referred to as 'Development Area 1' throughout); and
- ii. Land to the west of Ship Lane (excluding the school) applied for in outline (referred to as 'Development Area 2' throughout).

b) Application B – detailed planning application for the school (on land to the west of Ship Lane).

c) Application C – detailed planning application for highways and landscape works at Chalkers Corner.

2.5 The LBRuT (the Council) originally resolved to grant resolved to grant planning permission for Applications A and B but refuse Application C.

2.6 Following the LBRuT's resolution to approve the Applications A and B, the Mayor called-in the Applications and became the determining authority. The Mayor's reasons for calling in the Applications were set out in his Stage II letter (dated 4th May 2020) but specifically related to concerns regarding what he considered was a low percentage of affordable housing being proposed for the Site and the need to secure a highways solution for the scheme following the LBRuT's refusal of Application C.

2.7 Working with the Mayor's team, the Applicant sought to meaningfully respond to the Mayor's concerns on the Applications. A summary of the revisions to the scheme made and submitted to the GLA in July 2020 is as follows:

- i. Increase in residential unit provision from up to 813 units to up to 1,250 units;

- ii. Increase in affordable housing provision from (up to) 17%, to 30%;
- iii. Increase in height for some buildings of up to three storeys;
- iv. Change to the layout of Blocks 18 and 19, conversion of Block 20 from a terrace row of housing to two four storey buildings;
- v. Reduction in the size of the western basement, resulting in an overall car parking spaces reduction of 186 spaces and introduction of an additional basement storey under Block 1;
- vi. Internal layout changes and removal of the nursing home and assisted living in Development Area 2;
- vii. Landscaping amendments, including canopy removal of four trees on the north west corner of the Site; and
- viii. Alternative options to Chalkers Corner in order to mitigate traffic impacts through works to highway land only and allow the withdrawal of Application C.

2.8 The application was amended to reflect these changes.

2.9 Notwithstanding this, and despite GLA officers recommending approval, the Mayor refused the applications in August 2021.

2.10 The Mayor's reasons for refusal in respect of Application A were:

- i. height, bulk and mass, which would result in an unduly obtrusive and discordant form of development in this 'arcadian' setting which would be harmful to the townscape, character and appearance of the surrounding area;
- ii. heritage impact. The proposals, by reason of its height, scale, bulk and massing would result in less than substantial harm to the significance of several listed buildings and conservation areas in the vicinity. The Mayor considered that the less than substantial harm was not clearly and convincingly outweighed by the public benefits, including Affordable Housing, that the proposals would deliver;

- iii. neighbouring amenity issues. The proposal, by reason of the excessive bulk, scale and siting of Building 20 and 21 in close proximity to the rear of neighbouring residential properties in Parliament Mews and the rear gardens of properties on Thames Bank, would result in an unacceptable overbearing an unneighbourly impact, including direct overlooking of private amenity spaces. The measures in the Design Code would not sufficiently mitigate these impacts; and
 - iv. no section 106 agreement in place.
- 2.11 Application B was also refused because it is intrinsically linked with Application A and therefore could not be bought forward in isolation.

The Proposed New Scheme

- 2.12 This 3rd iteration of the scheme seeks to respond directly to the Mayors reasons for refusal and in doing so also addresses number of the concerns raised by the LBRuT.
- 2.13 The amendments can be summarised as follows:
- i. A revised energy strategy is proposed in order to address the London Plan (2021) requirements;
 - ii. Several residential blocks have been reduced in height to better respond to the listed buildings along the Thames riverfront and to respect the setting of the Maltings building, identified as a Building of Townscape Merit (BTM) by the LBRuT;
 - iii. Reconfiguration of layout of Buildings 20 and 21 has been undertaken to provide lower rise buildings to better respond to the listed buildings along the Thames riverfront; and
 - iv. Chalkers Corner light highways mitigation works.
- 2.14 The school proposals (submitted under 'Application B') are unchanged. The Applicant acknowledges LBRuT's identified need for a secondary school at the Site and the applications continue to support the delivery of a school. It is expected that the principles to be agreed under the draft Community Use Agreement (CUA) will be the

same as those associated with the refused school application (LBRuT ref: 18/0548/FUL, GLA ref: GLA/4172a/07).

- 2.15 Overall, it is considered that together, the Applications respond successfully to the concerns raised by stakeholders in respect of the previous schemes and during pre-application discussions on the revised Proposed Development. As a result, it is considered that the scheme now represents a balanced development that delivers the principle LBRuT objectives from the Site.

OSSPA

- 2.16 Full details and scope of both planning applications are described in the submitted Town Planning Statement, prepared by Gerald Eve LLP.
- 2.17 This OSSPA deals with matters relating to the loss of designated open space and the loss of the existing (privately-owned) sports pitches, and considers the scheme proposals against relevant planning policies and guidance.
- 2.18 Pre-application advice from the Greater London Authority (GLA), Sport England, Football Association, Football Foundation, Education and Skills Funding Authority (ESFA) and the London Borough of Richmond upon Thames (LBRuT) has been obtained throughout the development of the masterplan since 2017 and has been taken into account in the preparation of this OSSPA.
- 2.19 In addition, further pre-application discussions have taken place more recently in advance of this submission, specific to the revised proposals, including attendance at two Design Review Panels on 31st September 2021 and 2nd February 2022. Full details of pre-application consultation undertaken is set out within the accompanying Planning Statement and Statement of Community Involvement.
- 2.20 The proposals the subject of these planning applications relate to the redevelopment of the former Stag Brewery site in Mortlake. The masterplan, prepared by Squire and Partners, is for the comprehensive mixed-use redevelopment of the site to provide a new village heart for Mortlake comprising residential, a new secondary school (the subject of Application B), flexible commercial space (retail, cafes and restaurants etc.),

health care facilities, office space, hotel, community uses, gym/cinema together with associated car parking, open space and public realm.

- 2.21 The proposal involves development on the existing brewery private playing pitches at the site (on the western side of Ship Lane, the extent of which are shown on the diagram at **Appendix 1**) which raises two interlinked planning policy considerations:
- a. Loss of designated open space (i.e. visual amenity, green infrastructure, Other Open Land of Townscape Importance - OOLTI); and
 - b. Loss of existing playing pitches (i.e. sports provision and recreational value).
- 2.22 This OSPPA considers and assesses both of these matters.

3. Existing Situation

Main Stag Brewery Site (Application A)

- 3.1 The existing playing field land at the Stag Brewery site is located in the western corner of the site, with boundaries to Lower Richmond Road and Williams Lane. In total, it covers an area of approximately 2.06ha and is designated as ‘Other Open Land of Townscape Importance’ (OOLTI) in the Local Plan. The land accommodates two youth sized 11v11 football pitches and a small sports pavilion which includes changing room facilities. Each pitch measures 91m x 55m. **(Appendix 1)**
- 3.2 The playing fields have always been in private ownership. Originally, the playing fields were owned by the brewery, and used by brewery staff. Reselton Properties Limited (RPL) purchased the site, including the playing fields, in 2015. The playing fields have never provided unrestricted public access and do not allow public access on a day to day basis.
- 3.3 Through agreement with RPL, the playing pitches are used by Barnes Eagles Football Club, Thompson House School and St. Mary Magdalen School. Barnes Eagles use the playing pitches for football matches and football training at weekends during the football season. Thompson House School use the playing pitches for sports and games on Tuesdays during school term time. St. Mary Magdalen School use the playing pitches for its annual sports day. There is currently no evening use of the playing pitches.
- 3.4 The approximate level of activity on an annual basis can be summarised as follows:

User	Activity	Approximate annual usage (days or part of days)
Barnes Eagles FC	Football matches and training	70 days
Thomson House School	Sports/games	40 days

St Mary Magdalen School	Sports day	1 day
		111 days (30% of the year)

- 3.5 **Key Message 3a:** The sports/play value of the existing pitches is extremely limited. The pitches are in private ownership and therefore access has historically always been limited. Whilst currently used by a small number of groups under licence, the playing pitches are significantly under-utilised (due to the grass surface requiring time to recover and be prepared in-between intensive match use). There is no other authorised access to the land by the general public.

4. Adopted Stag Brewery Planning Brief

4.1 The Stag Brewery Planning Brief (SBPB) was adopted by LBRuT as a Supplementary Planning Document (SPD) in July 2011. It provides guidelines on future uses, layout and design for the redevelopment of the site, identifies opportunities and constraints and provides guidance for redevelopment proposals.

4.2 To be clear, the document is guidance not policy, and is now over 10 years old. Whilst it remains a material consideration in the determination of any planning application relating to the site, it does not form part of the statutory Development Plan against which proposals are to be assessed.

4.3 A requirement for a two form entry primary school is identified within the SBPB (paragraph 5.20). The Council's indicative vision plan, contained at Appendix 1 of the SBPB, identifies an indicative location for a primary school, which is shown to the north of (and partly on) the existing sports fields in the south west area of the site (**Appendix 2**).

4.4 The SBPB contains guidelines and advice in respect of the existing playing fields at the site.

4.5 Paragraph 2.6 states:

“The site includes a private playing field, which is protected as “Other Open Land of Townscape Importance” but is not designated as “Public Open space”.

4.6 Paragraph 2.42 states:

“There is an existing private playing field in the south west corner of the site. This comprises two football/one cricket pitch and a pavilion. This is currently used by Barnes Eagles Football Club on Saturdays and Sundays. It is also used by local schools for sports events and summer fairs”.

4.7 Paragraph 2.43 states:

“Consideration has been given to whether there would be any benefits from the relocation of this space and the Council’s conclusion (supported by the public)

is that it must be retained in this location, and made more accessible for public use”.

- 4.8 Appendix 1 of the SBPB contains an indicative concept plan identifying the LBRuT’s vision for the site (**Appendix 2**). Squire and Partners have transposed the indicative concept plan onto their base, in order to enable simple comparisons with the proposed masterplan (**Appendix 3**).
- 4.9 The vision plan identifies the western portion of the site for a mix of residential use (in buildings up to 7 storeys), a primary school with community use, a small area for retail uses (on Lower Richmond Road) and retention of the majority of the existing playing fields. **Appendix 4** identifies the parts of the existing playing field that the SBPB envisaged as being built upon for primary school use and residential use.
- 4.10 The primary school is shown, indicatively, to the north of and partly on the playing fields. Given the size of the area identified for the school, it is clear that this only accounted for the primary school building itself and did not take into account the associated open/play space requirements that would also be necessary to support the primary school. As a result, it is logical to assume that it was the ambition of the Planning Brief for the playing fields to be utilised by the primary school for this purpose.
- 4.11 **Key Message 4A: The adopted SBPB identified some development (including part of the proposed primary school) on the existing playing field. It also envisaged that the school would make use of the playing fields for sport and games.**
- 4.12 The SBPB indicative vision plan also identifies an area for a ‘green link’, located on the eastern part of the site, extending from Mortlake Green down to the river. This, plus the remainder of the majority of the playing fields, comprises the extent of green space shown on the SBPB indicative diagram. Given the indicative nature of the concept plan, it is not appropriate or necessary to measure these areas for consideration as they are shown as simple conceptual ideas as opposed to firm proposals. Planning policies within the Development Plan cover the requirements for provision of OOLTI, open space and amenity space within development proposals.

The need for hard play space / sports pitches

4.13 Following discussions with the Education and Skills Funding Authority (ESFA), it became clear that they would not support play/games facilities for any type of school on solely grass pitches because they deteriorate quickly and do not allow for all year round use. Correspondence between Gerald Eve and the ESFA's agents (Cushman Wakefield) (**Appendix 5**) states:

"It is therefore critical that any on site pitches are artificial as the needs of a secondary school could not be met with a grass surface".

4.14 In respect of the SBPB's primary school requirement, Cushman Wakefield advised that, for this type of school, the arrangement should include a school building of 2,072 sqm (GIA), with total site area (i.e. including outdoor play) of 15,986sqm (or 1.6ha). A proportion of the grassed playing fields would need to be given over to hard play / sports surfaces that could be more intensively utilised.

4.15 It is acknowledged that there are primary schools in London, and indeed in Richmond, where external school playing space is provided at a level less than desired, however, the area referred to by the ESFA represents the optimum requirement. The plan at **Appendix 6** shows an extent of external space required for a primary school, which is less than the ESFA requirement, and considered to be a reasonable level of provision for a primary school, demonstrating a significant area of the existing playing fields which could not be retained.

4.16 **Key Message 4b: The SBPB primary school proposal could not be delivered as shown on the concept diagram: development on the playing field would have been required in order to meet school play/sports requirements and standards.**

5. Implications of Requiring a New Secondary School

Timing of change to education requirement

- 5.1 Final bids for site purchase were submitted to Gerald Eve on 23 September 2015. Exchange of contracts took place during the early part of November, with completion of site purchase in early December.
- 5.2 On Thursday 15 October, after final bids had been submitted, a report was presented to LBRuT's Cabinet, seeking approval from Members to change the education requirement from primary to secondary school at the Stag Brewery site. The report was accompanied by an update to the School Place Planning Strategy, which identified the new requirement for a six form entry secondary school, plus sixth form, at the Stag Brewery site.
- 5.3 Whilst contracts were formally exchanged *after* the Cabinet Committee decision, at this late stage of the purchase process there was no opportunity to revise or amend bids given that the bidding process had been completed, and a preferred bidder selected for the purchase. Instead, it was determined that any future policy change to require a secondary as opposed to primary school would be discussed during formal pre-application discussions.
- 5.4 At the time the decision on the secondary school was made, the Cabinet Paper did not provide any details on how or when the SBPB would be amended to reflect the additional space requirements of the secondary school, nor were these space requirements made clear in the Cabinet papers. Despite Cabinet approval, no amendments have been made to the Planning Brief in respect of the school requirement.
- 5.5 Within the adopted Local Plan (2018), site allocation SA 24 (Stag Brewery, Lower Richmond Road, Mortlake), did confirm the amended education provision requirement on site, stating "The provision of an on-site new 6-form entry secondary school, plus sixth form, will be required".
- 5.6 The SBPB proposed retention of the majority of the existing playing fields on the basis of a primary school. The indicative diagram envisaged that a small primary school could

be located to the north of (but partly on) the playing fields, with the majority of the playing fields retained. As explained in the previous section, the ESFA has confirmed that a significant proportion of the playing field would have to be developed for hard surfaces in order to meet ESFA primary school requirements.

- 5.7 The change in requirement to a large secondary school means that it is not possible to locate a secondary school of the size required within the footprint identified in the SBPB for the primary school; a significant amount of additional space is required. Therefore, alternative locations and layouts must be considered for the new requirement. This is acknowledged within the site allocation policy, which refers to retention or re-provision of playing fields.
- 5.8 The project team worked closely with the ESFA and LBRuT from the summer of 2016 in respect of the school element of the scheme proposal. The ESFA's architects were involved in the process to ensure that the size, layout, components and specifications of the proposed school meet ESFA requirements in the event that the ESFA were responsible for delivery.
- 5.9 Extensive dialogue in respect of the school and playing fields has been held with local people and community groups through a variety of forums since 2016, including meetings and presentations, public consultation events and through Community Liaison Group (CLG) sessions, as part of the development of the masterplan over the last 5 years. The CLG sessions were attended by representatives of various local organisations. One CLG session focussed specifically on matters relating to the new school, impacts on playing fields and replacement facilities and re-provision.

School Location Options

- 5.10 A series of options have been explored to understand the most optimum location for accommodating the new secondary school. Theoretically, there are many locations for a secondary school on the site. However, regard must be had to the location of the primary school shown on the SBPB indicative diagram: on the western part of the site, to the north of (but partly on) the playing fields. It is assumed that this location was selected so that the school could make use of the playing fields.

5.11 Taking the above as a starting point, the project team has extensively assessed various locations for the new secondary school, on the western part of the site. Given the ESFA requirements for external play space for the new school, all options are based on development surrounding a new school play space (in place of the existing playing fields), and include options locating the school building to the north, east, south and west of the new external green space.

Option 1 (School to the south)

5.12 With reference to **Appendix 7**, an initial proposal was put forward which suggested retaining an existing grass pitch and locating a new secondary school to the south of the pitch with frontage onto Richmond Road. In addition, as part of a masterplan approach, Squire & Partners considered it was important to retain an urban edge to the open space and therefore a new street and residential blocks were proposed on the western side of the grass pitch.

5.13 This option was dismissed for the following reasons:

- The proposed school size and location was based on four storeys which was determined as inefficient by the ESFA and needed to be reduced in height;
- The location of the school blocked the openness of the site from the south and the outlook of properties located along Lower Richmond Road thus conflicting with the objectives of the SBPB and the site's OOLTI designation;
- The utilisation of a retained grassed area pitch for the secondary school was considered unacceptable to the ESFA due to maintenance issues and the ability to use the space intensively.

5.14 There were concerns that the proposed blocks west of the new open space area would locate residential accommodation on land previously utilised by private open space. At this point, the level and quantum of redistribution for the existing open space throughout the site was not fully understood.

Option 2 (School to the west)

5.15 With reference to **Appendix 8**, it can be seen that, due to the reduction in height required of the school by the ESFA, the footprint significantly increased. It was therefore

proposed to re-orientate the school on the western side by maintaining an urban form around the proposed open space. In order to accommodate a harder wearing surface which can be more intensively used in association with the school activities, the form of the open space necessarily means a reduction in grassed area.

5.16 The scheme provided a number of benefits in comparison to the previous design iteration including;

- An increase in the quantum of open space to be retained in this location;
- A total increase in the quantum of open space to be distributed throughout the site as a whole (At this time there was a greater understanding of the quantum of open space throughout the site);
- The retention of the openness of views to the south of the existing playing fields;
- The maintenance of a clear urban form along Williams Lane as part of a masterplan approach;
- A significant increase in the opportunity for sports and recreation both through the use of sports surfaces on the existing open space area allowing for a greater intensification of sports use, as well as the creation of a new MUGA within the new secondary school.

5.17 Despite what was considered to be a high quality masterplan solution for both the secondary school and the open space issue, following concerns raised during the public consultation exercise, RPL instructed Squire & Partners to review again how the school's disposition could be refined further. The key issues of concern in respect of Option 2 related to:

- The loss of open space to residential accommodation;
- The associated reduction in the quantum of open space to be retained in this location;
- The continued presence of built form on the west side of the new open space area resulting in a reduction for openness and properties along Williams Lane;
- The significant reduction in grassed area resulting from an increase in sports surfaces.

Option 3 (School to the north)

- 5.18 Following the review of Option 2 by Squire and Partners, and further discussions with LBRuT, the position of the school was amended and proposed to be relocated towards the rear of the site. This not only better reflected the original desired location for the primary school within the Council's Planning Brief, but also provided an opportunity of increased open green space on the site, and to the Lower Richmond Road site frontage.
- 5.19 Initially, three sub-options were considered (each with the school to the north), as shown on Plans A, B and C at **Appendix 9**. Plans A and C identify the opportunity for incorporating a 3G football pitch which would provide the opportunity for Barnes Eagles Football Club to continue training and playing at the site. Alternatively, Plan B demonstrates that reducing the area associated with hard sports surfacing would allow for a new community park to be incorporated at the south of the site creating new meaningful open space which is publically accessible. Plan C demonstrates an option to include a 3G football pitch and provide a community park.
- 5.20 The series of diagrams at **Appendix 10** explain the iterative design process associated with Option 3.

Step 1

- 5.21 The SBPB requirement for a new primary school to the north of the playing fields is shown, as is an area of external play space appropriate for a school of this size. This would result in loss of this part of the playing fields, alongside those other parts of the playing fields which the SBPB indicative diagram envisaged as being developed on.

Step 2

- 5.22 The secondary school footprint is shown, in place of the original primary school. This would contravene the provisions of the SBPB and would have impacts in terms of residential amenities to the occupants of existing properties on Williams Lane.
- 5.23 As can be seen, this layout would bring the western elevation of the new school to the very edge of the site, very close to existing properties on Williams Lane. This would be likely to result in impacts to existing amenities, including in respect of noise, outlook, privacy, daylight, sunlight and overshadowing. This layout would also contravene the

provisions of the SBPB by proposing part of the school on land identified for residential use.

Step 3

5.24 In order to mitigate the issues arising from Step 2 above, the school is moved southwards onto the northernmost part of the playing field, away from the Williams Lane residential properties and partly onto land outside the boundary of the playing field. The external play space requirement encroaches onto land identified within the SBPB as for new residential development.

Step 4

5.25 The external space requirement is amended through relocating the SBPB residential zone (on the east of the playing fields), across to the western side of the playing fields. This move results in all land in front of the school being capable of having OOLTI status and it delivers a layout which includes an urban edge to the western part of the site, providing a frame around the new green space, OOLTI views into the site, with the school at the top end.

Step 5

5.26 Following further discussions amongst the project team, and discussions with LBRuT, some further amendments to this option were made, resulting in the masterplan shown as Step 5. The changes made comprise:

- Relocation of school car parking from western side of school to eastern side;
- Removal of new road running east-west to the north of proposed school, and replacement with pedestrianised public realm;
- Replacement of single residential block on western edge of site with two smaller blocks; and
- Further design of the community park.

5.27 Squire and Partners confirmed the following footprint area figures associated with this masterplan version:

- School footprint total: 3,887sqm

- School footprint on existing playing field: 3,056sqm
 - Residential blocks on playing field footprint: 1,760 sqm
 - Total proposed built footprint area on playing field: 4,816sqm (0.48ha).
- 5.28 This arrangement provided benefits in terms of the overall amount of open and amenity space, green space, and replacement OOLTI, and resulted in the school having an appropriate setting, with the open space being framed by built form.
- 5.29 Local residents and members of the CLG remained opposed to this option, principally on grounds that the school building and the residential blocks were considered to be unacceptably close to residential properties on Williams Lane. Concerns were also raised in respect of the proximity of the external play space and MUGA to those residential properties. Officers remained concerned about the extent of development proposed on the footprint of the existing playing field (particularly in respect of the residential blocks on the western boundary).

Option 4 (school to the east)

- 5.30 As part of original pre-application dialogue, there were concerns remaining in respect of Option 3. Consequently, the project team considered a further option for the school location: to the east of the playing fields. Consequently, the applicant had considered options for the school location to the south, west, north and east of the playing fields.
- 5.31 At this time, this location was the preference of the Mortlake Brewery Community Group (MBCG) which had prepared a sketch diagram for this option, included at **Appendix 11**. Squire and Partners transposed the MBCG sketch onto their masterplan base for ease of comparison and consideration (also included at **Appendix 11**).
- 5.32 In this option, the residential blocks on the western part of the playing field were removed entirely from the proposals, and less of the school building footprint was on the footprint of the existing playing fields. However, the MBCG proposal was not achievable in terms of providing two full size football pitches due to insufficient space and a requirement (from Sport England) to provide appropriate run off space and spectator space (**Appendix 11**). In addition, the MBCG arrangement did not allow for any external school

playground space or a MUGA. Further, the MBCG option would not allow for any space for a community park at the front of the site, which was a key benefit of Option 3.

- 5.33 In order to address the deficiencies associated with Option 4, Squire and Partners developed this option further, but retained the school in this location. **Appendix 12** contains the preferred solution for the school. In this version, a single full size football pitch is provided (3G surface to satisfy ESFA and Sport England requirements), additional school play and playground space is provided in front of the school (and separate from the playing pitch), an external MUGA is provided (away from existing residential properties) and a community park (albeit smaller than proposed under Option 3) is included. This option provided significant benefits compared with the other options considered.
- 5.34 Option 4 involves the least built development on the footprint of the existing playing fields of all options considered. No residential development is proposed on the existing playing fields, and only a small element of the new school building is proposed. The diagram at **Appendix 12** shows the extent of the proposed school building which would occupy current playing field land. This measures approximately 0.2ha (compared with Option 3 of 0.48ha): a reduction of almost 60% of built development on the existing playing field footprint compared with Option 3.
- 5.35 Option 4 retains the openness of this part of the site as currently exists: no built development on the western boundary, closest to existing residential properties on Williams Lane, and retained open frontage onto Lower Richmond Road.
- 5.36 **Appendix 13** contains the detailed arrangement for the school element of the development. The school, proposed on the eastern side would have straightforward access and servicing arrangements via the new proposed road of Lower Richmond Road. All car parking associated with the school is located on the eastern side of the school building, away from existing residential properties and there would be no vehicle access required to Williams Lane. Equally, drop off and bus services would not need to egress using Williams Lane as Ship Lane would provide egress.
- 5.37 At the time, Michael Grubb Studio carried out an assessment of all options in respect of the playing pitch having appropriate floodlighting to facilitate evening use of the new pitch, as required by Sport England. As detailed in the accompanying Lighting

Masterplan document and Lighting Assessments, this configuration allowed for the pitch to be lit without having any detrimental impacts to residential properties in terms of light spill and glare.

- 5.38 Finally, Option 4 provides the greatest level of benefit in terms of overall site-wide open space, amenity space and OOLTI.

School Location Option 4: Benefits

- 5.39 This masterplan arrangement provides the optimum location and design solution for the proposed school and open space. In this option, the following benefits would be delivered:

- Provision of a new secondary school of a size and specification suitable to the ESFA and meeting the capacity requirements of LBRuT;
- Minimal development encroachment on the footprint of the existing playing fields ((just 0.2ha – representing circa 10% existing playing field footprint), thereby most closely representing the SBPB vision in terms of playing pitch retention;
- No residential development proposed on any part of the existing playing field footprint;
- Provision of a full size 3G football pitch (to enable year-round football use, including for existing and additional users), and external multi-use play space to the south west of the school building, thus delivering significant sports benefits compared to the existing situation;
- Maximum regard had to the amenities of existing residents on Williams Lane, by positioning built form furthest away from them;
- Close reflection of the preferred arrangement of the Mortlake Brewery Community Group, CLG members and local residents;
- Floodlighting for the new pitch, to enable community use and sporting benefits, without detrimentally impacting on any existing or new residential occupiers;
- Retention and enhancement of amenity views into the site from Lower Richmond Road (preservation of OOLTI), most closely reflecting the existing site situation;
- Appropriate separation distances between proposed new residential buildings to the north of the football pitch, the nursing home to the east of the proposed school building and the existing residential properties on Williams Lane;

- Enhanced opportunities for hard and soft landscaping within the school application boundary;
- Provision of a new community park at the very front of the site, fully accessible to members of the public, site users and occupants and school children;
- School entrance and access and drop-off arrangements avoiding any additional traffic using Williams Lane;
- Significant replacement green and OOLTI qualifying space throughout the site, far exceeding existing OOLTI quantum (see Section 7 of this OSPPA);
- Significant publicly accessible open green space throughout the development in comparison to the current situation (no publicly accessible space) (see Section 7 of this OSPPA);
- Total overall amenity space throughout the development (vast majority of which is publicly accessible) of approximately 4.83ha (including towpath) / 4.54ha¹ (excluding towpath). A combination of publically accessible open space, private amenity space, courtyard space and hardscaped areas.

5.40 Although it will still not be possible to retain the existing grassed pitches (which would be the case under any option), the increased quantum of open space in this location will allow for a flexible, more intensive use, which will benefit a much greater number of individuals and groups overall. The public benefits associated with the proposed masterplan, as summarised above, are significant and wide-reaching. In addition, the key concerns from the neighbouring residents with regard to the openness of the site are now considered to have been addressed.

Summary

5.41 A series of options for the location of the new school and its associated facilities have been comprehensively investigated and assessed. The proposed arrangement, as applied for, is the culmination of extensive option and scenario testing having regard to all material considerations. In summary:

¹ Originally confirmed as 47,687sqm (4.77ha) in the July 2020 Addendum. This was an error and should have been identified as 44,850sqm (4.48ha). See Page 12 of Appendix 15.

- A secondary school with sixth form requires significantly more land than a primary school;
- The existing playing fields would not be retained in their existing form in either a primary or secondary school scenario as school play/sports requires a more robust surface to enable intensive use;
- A secondary school cannot be provided on the volume of land identified for a primary school in the SBPB;
- The height and footprint of the proposed school is fixed, having regard to ESFA criteria and LBRuT's required capacity of the school;
- Play and sports provision must be linked with the proposed school (in order to meet ESFA requirements and comply with the SBPB);
- Various options for the school location have been extensively considered. On the basis that the existing playing fields would not have been fully retained under any redevelopment proposal, the options considered involve development on the playing field land.
- Various options for the school location have been discounted due to concerns relating to impact to OOLTI and retaining open views into the site, design and amenity relationships with existing residential properties, and conflicts with designated development zones identified in the SBPB.
- Locating the school in the proposed location (Option 4), as shown on the masterplan, enables:
 - retention of the open aspect of this part of the site (and re-provides OOLTI, including a new public park);
 - an appropriate relationship with surrounding uses;
 - provision of play/sports space to be directly linked with the school, and used more intensively throughout the year;
 - compliance with the principles of the SBPB for the western part of the site; and
 - meeting ESFA requirements to ensure delivery of the school.

5.42 Key Message 5b: A comprehensive and thorough assessment has been carried out by the applicant to determine the optimum masterplan location for a secondary school and associated play space. The selected option is the optimum

solution, and would provide public benefits. The existing grass playing fields, however, cannot be retained in the current form.

- 5.43 The consequence of this masterplan outcome raises two planning policy matters: the re-provision of a quantum of open space (2ha – the area of existing playing fields occupied by the proposed secondary school), and the re-provision of play/sports facilities.
- 5.44 The subsequent sections of this report focus on the planning policy position with regards to the loss of the existing playing fields and the circumstances in which re-provision of open space and sports/play facilities can be considered appropriate.

6. Relevant Planning Policy: Open Space

Summary

- 6.1 There are two interlinked planning policy issues associated with the proposal. These are summarised at paragraph 2.9 of this report:
- a. 'Open Space Policy' - Loss of designated open space (i.e. visual amenity, green infrastructure, Other Open Land of Townscape Importance) and is this loss mitigated by the proposals?
 - b. 'Play / Sports Policy' Loss of existing playing pitches (i.e. sports provision and recreational value) and is this loss mitigated by the proposals?
- 6.2 The default policy position in respect of both aspects above is that existing open space and play/sports facilities will be protected. However, the position is not inflexible for either element. Instead, in appropriate circumstances, and if certain criteria can be satisfied, it can be appropriate for existing open space and play/sports space to be replaced with alternative facilities. Sections 7 and 9 of this report assess the proposals in this respect.

Open Space Policy

- 6.3 This policy consideration relates to the open nature of the existing playing fields, specifically, the visual amenity it provides and its value as green infrastructure in this part of the borough.
- 6.4 The existing playing fields, part of Chalkers Corner and parts of the surrounding land, are designated within the Development Plan as 'Other Open Land of Townscape Importance' (OOLTI).
- 6.5 Relevant planning policy and guidance in respect of OOLTI is contained within:
- LBRuT Local Plan (2018); and
 - Adopted Stag Brewery Planning Brief (SPD) (2011).

Local Plan (2018)

6.6 The Local Plan contains several policies in respect of OOLTI and public open space.

6.7 Policy LP14 relates to OOLTI and it states that OOLTI will be protected but acknowledges that there may be exceptional circumstances where appropriate development is acceptable.

6.8 The supporting text at paragraph 5.3.6 confirms:

“Where a comprehensive approach to redevelopment can be taken, such as on major schemes or regeneration proposals, or for community and social infrastructure including educational uses, it may be acceptable to re-distribute the designated open land within the site, provided that the new open area is equivalent or improved in terms of quantum, quality and openness.” (Emphasis added).

6.9 Policy LP31 requires proposals to provide Public Open Space, Play Space, Sport and Recreation. As stated previously, it is possible that open and play space can also qualify as OOLTI.

6.10 Policy LP12 relates to green infrastructure and states that all development is to protect and, where possible, enhance green infrastructure. Proposals should incorporate green infrastructure assets, which make a positive contribution to the wider green infrastructure network.

6.11 The Local Plan includes a development allocation for the Stag Brewery site. Site Allocation SA24 states:

“The Council will support the comprehensive redevelopment of this site. An appropriate mix of uses, particularly at ground floor levels, should deliver a new village heart and centre for Mortlake. The provision of an on-site new 6-form entry secondary school, plus sixth form, will be required. Appropriate uses, in addition to educational, include residential (including affordable housing), employment (B uses), commercial such as retail and other employment

generating uses, health facilities, community and social infrastructure facilities (such as a museum), river-related uses as well as sport and leisure uses, including the retention and/or re-provision and upgrading of the playing field. The Council will expect the provision of high quality open spaces and public realm, including links through the site to integrate the development into the surrounding area as well as a new publicly accessible green space link to the riverside.” (Emphasis added).

SBPB (July 2011)

6.12 The relevant provisions of the SBPB in relation to the playing fields and open space can be summarised as follows:

- The private playing field is OOLTI but is not designated as ‘Public Open’ space (paragraph 2.6);
- The Council will seek to protect and enhance the designated OOLTI (paragraph 2.43);
- Opportunities to create formal and informal open recreation space must be taken into account,
- Development adjacent to the area of open land should have regard to the visual impact on the character of the open land.

7. Assessment: Open Space (Main Site)

7.1 The existing grass playing pitch and some adjacent land (non-playing fields) is designated as OOLTI under LBRuT policies. As described in the previous section of this report, policies seek to protect and, where possible, enhance existing OOLTI. OOLTI is land which has value as green infrastructure and townscape amenity value.

7.2 The Local Plan confirms that a flexible approach can be taken in respect of development on existing OOLTI. Paragraph 5.3.6 of the Local Plan states:

“Where a comprehensive approach to redevelopment can be taken, such as on major schemes or regeneration proposals, or for community and social infrastructure including educational uses, it may be acceptable to re-distribute the designated open land within the site, provided that the new open area is equivalent or improved in terms of quantum, quality and openness”.

7.3 On the basis of the above, the first ‘test’ in considering the appropriateness of redistributing open space is whether the nature of the proposal is suitable for consideration.

7.4 The application proposal constitutes a major scheme, is a regeneration proposal and includes community and social infrastructure including an education use. Consequently, the proposal is clearly suitable for flexible consideration of how the existing OOLTI may be assessed. This applies to the main masterplan scheme (Application A) and the new school (Application B) which are considered in more detail in the following section of this OSPPA.

7.5 The second ‘test’ is whether the new open space is equivalent or improved in terms of quantum, quality and openness. In order to consider all of these matters, it is first necessary to define what constitutes OOLTI qualifying space.

7.6 The Local Plan defines OOLTI (Appendix 7) as follows:

“Open areas, which are not extensive enough to be defined as Metropolitan Open Land, but act as pockets of greenery of local significance, contribute to the local character, and are valued by residents as open spaces in the built up play area. These areas can include public and private sports grounds, some school playing

fields, cemeteries, allotments, private gardens, areas of vegetation such as street verges and mature trees. OOLTI is a local policy and new designations are made by the Council as part of the plan-making process. This is different to 'Local Green Space' (see definition above), which national policy makes provision for".

7.7 Paragraph 5.3.4 of the Local Plan provides further guidance and confirms that the following are taken into account when defining OOLTI:

- Contribution to the local character and/or street scene, by virtue of its size, position and quality.
- Value to local people for its presence and openness.
- Immediate or longer views into and out of the site, including from surrounding properties.
- Contribution to a network of green spaces and green infrastructure as set out in policy LP12.
- Value for biodiversity and nature conservation and meets one of the above criteria.

7.8 In respect of the above, the Local Plan states that these are qualitative and not all need to be met.

7.9 There are various elements of the proposed development which are capable of having OOLTI status and can therefore be considered to mitigate loss of existing OOLTI. The scheme elements that qualify include public green space, courtyard green spaces, private gardens and the external school playing facilities.

7.10 In respect of the proposed school play facilities, these will comprise artificial green play surfaces (such as AstroTurf / 3G pitches). These will be high quality materials, similar to those shown on the photographs in **Appendix 14**.

7.11 It is the applicant's intention that these elements are made available to the local community through a shared community use agreement. As such, this particular element of replacement OOLTI qualifying space would:

- Contribute to local character and street scene by virtue of its size, position and quality;

- Provide amenity value for local people due to its presence and openness;
- Allow for long views into the site, including from surrounding properties; and
- Contribute to a network of green spaces and green infrastructure within the site and linked with the site.

7.12 On the basis of the above, these elements of the proposed development qualify as potential replacement OOLTI to be assessed against the second test identified above: whether the new open space is equivalent or improved in terms of quantum, quality and openness.

Quantity

7.13 The existing LBRuT OOLTI designation, which covers the full extent of the playing fields, measures approximately 2.2ha, however, this includes non-green elements such as the sports pavilion building, its car park and other hard-surfaced areas. We consider that these elements do not constitute qualifying OOLTI and should therefore be removed from the existing qualifying area. **On this basis, the actual existing OOLTI qualifying green space (ie the full extent of the playing fields) measures 2.06ha (see Appendix 15).**

7.14 In the SBPB, green space was proposed through retention of the majority of existing playing fields and a new green link from Mortlake Green to the river. The retained playing fields (after taking account of the elements which were identified as being built upon) measures approximately 1.85ha. The green link is shown only indicatively and conceptually in the SBPB, and therefore no prescribed area or amount of space was identified for this.

7.15 The proposed replacement OOLTI (public green space, courtyard green spaces, private gardens and external school playing facilities) comprises a total area of approximately 3.3ha² (**Appendix 15**).

7.16 **Key Message 7a: Against the existing provision on site (2.06ha), the proposals would deliver an overall increase in OOLTI of 62% compared with the baseline**

² Identified as 3.06ha in error within original submission. Updated to 2.88ha in the July 2020 Addendum, subsequently corrected to 3.3ha. See Pages 10 and 12 of Appendix 15.

(existing) situation. This quantum is also suitable in comparison with the green space elements envisaged within the SBPB (reduced playing fields of 1.85ha and new green link of unspecified size).

7.17 Whilst not a requirement of OOLTI, a key objective of the SBPB was to ensure that the open spaces (retained playing fields and new green link) were fully accessible to the public. Therefore, it is important to consider the proposed development in this respect.

7.18 The majority of proposed OOLTI is publicly accessible, although some elements (e.g. private gardens to proposed houses) are not. The existing OOLTI at the site is not publicly accessible. In addition to replacement OOLTI, the proposed masterplan also includes extensive areas of publicly accessible open spaces.

7.19 **Key Message 7b: Overall, total public accessible amenity space proposed (which includes accessible OOLTI areas) within the masterplan amounts to 3.94ha³ (excluding towpath) (see Appendix 15). This compares with the current situation of no publicly accessible open space at all.**

7.20 The SBPB identified 1.85ha of retained playing field space, to be made more accessible, plus an open green link. Even allowing for a significant area for the green link, 3.94ha of publicly accessible open amenity space far exceeds the SBPB vision.

Quantitative Assessment: Scenario Testing

a) Green link space removed from assessment

7.21 During pre-application discussions and feedback, LBRuT requested that OOLTI assessment includes a scenario whereby the proposed green link OOLTI space is removed from the OOLTI re-provision calculations, on the grounds that the SBPB identified a requirement for this space and, as such, it should not be counted towards OOLTI re-provision.

³ Identified as 4.37ha in error within July 2020 Addendum. Subsequently corrected to 4.08ha. See Page 12 of Appendix 15.

7.22 The public green space elements of the proposed green link (**Appendix 15**) amount to an area of 1,357sqm. If this were to be deducted from proposed new OOLTI (3.3ha⁴), the scheme would still be delivering 3.19ha of replacement OOLTI, far exceeding existing OOLTI (2.06ha) and the SBPB vision (1.85ha plus green link of unspecified size).

b) Playspace and private amenity space removed from assessment

7.23 Officers also advised, during pre-application discussions, that OOLTI replacement calculations should not include private amenity space and playspace as this would be required even in the event that the existing playing fields were retained. Whilst the provision of playspace and private amenity space would be required, there is no reason why, if designed appropriately, it could not also constitute new OOLTI (i.e. they are not mutually exclusive).

7.24 OOLTI is clearly defined within the Development Plan as pockets of greenery. LBRuT's definition does not exclude private gardens or play areas; indeed, the definition confirms that sports and play facilities can be included. The play space strategy for the site is to incorporate and integrate areas of play within the wider landscape and open spaces and, consequently, these areas should not be excluded from constituting OOLTI.

7.25 Notwithstanding the above, we have undertaken an assessment of this scenario. The proposed playspace for the development is 7,470sqm⁵, plus private amenity space (associated with terraced housing in Development Area 2 only) of 3,309sqm (0.33ha), amounts to 10,779sqm (approximately 1.1ha)⁶. If this were to be deducted from proposed new OOLTI (3.3ha⁷), the scheme would still be delivering 2.2ha of replacement OOLTI, which would comfortably exceed existing OOLTI (2.06ha) and the SBPB vision (1.85ha plus green link of unspecified size).

⁴ See Footnote 2.

⁵ See Chapter 5 'The Proposed Development' of Environmental Statement

⁶ See Page 12 of Appendix 15.

⁷ See Footnote 2.

c) Green link space, playspace and private amenity space removed from assessment

7.26 In this scenario, a) and b) above are combined. Whilst at face value, this would equate to a total of 12,136sqm (1,357 sqm green link, plus 7,470sqm of playspace, plus 3,309 sqm of private amenity space), the green link is already included within the playspace calculation, and therefore cannot be double counted. This would result in a total of 10,779sqm as set about above. Separately, there is a small increase of 102 sqm additional green link, equating to a deductible area of 10,881sqm (approximately 1.1ha).

7.27 If this overall total were to be deducted from proposed new OOLTI (3.3ha), the scheme would still be delivering approximately 2ha of replacement OOLTI, which would still comfortably exceed existing OOLTI (2.06ha) and the SBPB vision (1.85ha plus green link of unspecified size).

7.28 Finally, under the consideration of OOLTI replacement quantum, the proposed masterplan would deliver a total of 4.83ha (including towpath) and 4.54ha⁸ (excluding towpath) of overall amenity space (incorporating green spaces, public and private green space, hard landscaped public realm and an enhanced river towpath). This equates to approximately 49% (excluding the towpath) and 52.3% (including the towpath) of the existing site area as a whole, representing a very significant uplift in amenity compared with the existing site and the vision within the SBPB.

7.29 There can be no doubt that, in terms of quantum of re-provision, the OOLTI policy is satisfied by the proposals, even in scenarios whereby green link space, play space and private amenity space are omitted from the replacement OOLTI quantum.

Quality

7.30 The quality of the proposed open space should be considered on its own merits as well as against the quality of the existing open space at the site.

⁸ See Footnote 1.

7.31 The existing open space at the Stag Brewery site comprises a single grass field and nothing else. Whilst this provides ‘openness’ value (see next section) it does not provide any other particular significant quality, for example:

- Variety – the existing OOLTI provides no variety; it is grass only.
- Landscape features – the existing OOLTI has no landscape features of note;
- Planting diversity – there is no diversity in terms of planted features as the existing OOLTI comprises grass only.
- Biodiversity – the existing grass pitches are used for occasional football and school sports use; this precludes any significant biodiversity or ecological benefit of the existing OOLTI.

7.32 The redevelopment of this large site provides an opportunity to add significant value to the landscape quality in comparison to the existing situation and, given the size and extent of the site, the opportunity for different character areas and a diverse landscape is provided.

7.33 The proposals provide the opportunity for a series of spaces, each with different landscape characters and features, and opportunities for significant visual interest and amenity through a varied approach towards landscaping as opposed to one single type of green space. The planning applications are accompanied by Landscape Design and Access Statements which contain full details of the landscape strategy, components and features.

7.34 The overall package of proposed open space will be of a very high quality, befitting of a comprehensive regeneration of this important riverfront site. Gillespies are appointed as project landscape architects and have undertaken a significant amount of work in developing the landscape masterplan for the development.

7.35 At the heart of the landscape masterplan approach is the objective to deliver a mix of types of open areas throughout the site, supplemented by extensive tree planting and soft landscaping. A range of character areas will be provided within a number of green areas across the site, each of which will contribute to green infrastructure provision as supported by Policy LP12. Landscape elements include play facilities, paths and seating areas as well as soft landscape and pedestrian and cycle circulation.

7.36 **Key Message 7c:** The quality of the proposed OOLTI space would be far superior to the quality of the existing grass pitches and the masterplan landscape approach meets all relevant planning policies.

Openness

7.37 This consideration relates to the genuine ‘openness’ of space provided within the development. The Local Plan defines ‘open space’ at Appendix 7 as follows:

“All land that is predominantly undeveloped other than by buildings or structures that are ancillary to the open space use. The definition covers a broad range of types of open spaces, whether in public or private ownership and whether public access is unrestricted, limited or restricted”.

7.38 The assessment of ‘openness’ comprises two parts:

- a) Openness from a visual perspective – appearance of open space and open areas within the development, and vistas through open spaces; and
- b) Openness from an accessibility perspective and the ability to use and navigate through and within open parts of the site.

7.39 In respect of a) above, the existing grass pitches provide an area of open space on the western part of the site, extending from Lower Mortlake Road through towards the northern site boundary. The remainder of the site comprises buildings and developed areas associated with the historic brewery use, and does not have any value in terms of openness from a visual perspective.

7.40 The proposals would retain openness on the western part of the site, across the new playing pitch. In addition, a new community park at the front of the site is proposed, which would provide enhanced visual amenity in this location. Further, other parts of the site (currently with no visual openness value) would, under the proposals, provide new areas of openness including the green link leading down to the river and other landscaped routes through the site.

- 7.41 Finally, in respect of a), the proposals would provide total landscape open space amounting to 4.54ha⁹ (excluding towpath) compared with the existing 2.07ha on site, representing a substantial uplift in visual openness throughout the site.
- 7.42 In respect of b), which relates to the usability and accessibility of areas of openness, the existing situation is that there are no accessible open parts of the site to the general public. The development would deliver various publicly accessible open areas and routes, amounting to over 3.94ha¹⁰ in total across the site.
- 7.43 A key element of the publicly accessible spaces within the scheme is the quality and extent of public realm provided to encourage pedestrian movements within, around and through the site. It is the applicant's intention to undertake landscape works to the river frontage and towpath area of the site, improving accessibility and usability of this river frontage zone.
- 7.44 A central feature of the masterplan is to create openness and permeability through the site, down towards the river. This responds to a key objective of the SBPB. The masterplan creates a series of links and routes through the site which would deliver meaningful openness. The existing site provides no public permeability or openness.
- 7.45 **Key Message 7d: The proposals would deliver a significantly greater degree of openness than is currently provided at the site, both in terms of openness from a visual perspective and also from an accessibility and usability perspective.**
- 7.46 **Key Message 7e: The proposal would deliver new OOLTI to replace existing of a greater quantum, quality and openness and therefore meets the requirements of LBRuT's adopted and emerging planning policies.**

⁹ See Footnote 1.

¹⁰ See Footnote 3.

Other Relevant Policy Compliance

7.47 In addition to OOLTI policy considerations, other policies relevant to open space are set out in section 6 of this report. The table below identifies how the scheme complies with all other relevant policies.

Policy	Response
LP12 Green Infrastructure	As assessed above, OOLTI is proposed to be re-distributed through the wider masterplan by re-provision and enhancement to green infrastructure at the application site.
Development should incorporate new green infrastructure	The proposals incorporate significant new green infrastructure.
LP31 Public Open Space, Play Space, Sport and Recreation	
Development to include new open space	The proposals include significant areas of new open space
New open space where possible to be linked with wider network of spaces	A comprehensive network of spaces is proposed within the masterplan proposals. Specifically, Mortlake Green to the south of the site, and the river towpath to the north of the site. Landscape strategy seeks to enhance pedestrian movements and linkages to and from these locations and to wider areas of the community.

Larger developments to include open space provision within scheme	Full compliance with comprehensive open space strategy.
Balance between private, semi-private and public space	The proposed open spaces include a balance of types of space.
SA24 Site allocation	
Development to include high quality open spaces and public realm	The proposals include high quality open spaces and public realm provision.
Development to provide publicly accessible green space link to the riverside	A significant publicly accessible link, incorporating extensive green space and soft landscaping, is proposed within the masterplan. Further, additional new pedestrian links and routes through to the river are proposed, contributing to a permeable development, in accordance with the SBPB aims and objectives.

Conclusion

- The existing playing fields are designated OOLTI.
- It is appropriate to consider the re-distribution of this designated open land for particular proposals: major schemes, regeneration proposals and schemes involving community and social infrastructure, including an education use. The proposed scheme meets all of these qualifying criteria.

- Where the above criteria are met, re-distribution may be acceptable provided the new open space is equivalent or improved in terms of quantum, quality and openness.
- The proposals comprise a significantly greater quantum of OOLTI qualifying open space (3.3ha¹¹) than currently exists at the site (2.06ha), an increase of 62%;
- The proposals comprise a significantly greater quantum of OOLTI qualifying open space (3.3ha¹²) than envisaged by the SBPB (1.85ha retained playing field and new green link of unspecified size);
- The proposals comprise a greater quantum of OOLTI qualifying space than currently exists at the site and as envisaged by the SBPB even in scenarios where proposed play space, the green link and private amenity space are not counted as replacement OOLTI;
- The existing OOLTI (playing field) provides a limited contribution to local people (it is not publicly accessible), nor does it provide any other significant qualities (e.g. variety, landscape features, planting diversity, biodiversity etc);
- The dispersal of OOLTI space throughout the site (as opposed to being focussed in two locations only) is a sound landscape approach, and one which would deliver high quality landscape throughout the development to the benefit of residents, visitors and the wider local community;
- The quality of the proposed OOLTI is far superior to that provided by the existing playing field, as demonstrated in the Landscape Design and Access Statement, prepared by Gillespies;
- The proposed OOLTI satisfies the policy requirement of 'openness' via it being publicly accessible, and through the permeability proposed within the masterplan, which will provide the opportunity for greater access to and appreciation of the OOLTI;
- The proposed OOLTI space satisfies a greater range of OOLTI policy objectives than the existing space;

¹¹ See Footnote 2.

¹² See Footnote 2.

- Publicly accessible open space (much of which is OOLTI qualifying) is proposed, amounting to 3.94ha¹³, compared with the existing situation (no publicly accessible space);
- Overall total amenity space throughout the development (green space, OOLTI, public plazas, public realm and towpath) amounts to approximately 4.83ha (including towpath) / 4.54ha¹⁴ (excluding towpath), equating to approximately 51% of the overall site area;
- All other relevant landscape and open space planning policies are fully complied with by the proposed development.

¹³ See Footnote 3.

¹⁴ See Footnote 1.

8. Relevant Planning Policy: Play / Sports Provision

8.1 This policy consideration relates to the sports / play use that the existing playing fields provide, and whether it is acceptable for the existing play / sports provision to be replaced with alternative facilities as part of the site's redevelopment.

8.2 Relevant planning policy and guidance is contained within:

- National Planning Policy Framework (2021);
- London Plan (2021)
- LBRuT Local Plan (2018);
- Adopted Stag Brewery Planning Brief; and
- Sport England's 'A Sporting Future for the Playing Fields of England'.

National Planning Policy Framework (NPPF)

8.3 NPPF paragraph 99 advises that existing sports facilities, including playing fields, should not be built on unless:

- An assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or
- The loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or
- The development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.

Local Plan (2018)

8.4 Policy LP31 confirms that formal and informal sports grounds and playing fields will be protected and, where possible, enhanced. The supporting text to this policy (paragraph 8.4.18) states that the Council will resist the loss of playing fields unless the proposal meets the exceptional circumstances test as set out in Sport England policy.

8.5 The Site Allocation for the Stag Brewery (SA24) confirms that sport and leisure uses are appropriate, including the retention and/or re-provision and upgrading of the playing field.

SBPB (July 2011)

8.6 The relevant provisions of the SBPB in relation to the play / sports use of the playing fields can be summarised as follows:

- The existing private playing field comprises two football / one cricket pitch and a pavilion (paragraph 2.42);
- The facilities are used by Barnes Eagles Football Club at weekends and by local schools for sports events and summer fairs (paragraph 2.42);
- Having considered relocating the playing fields, the Council’s conclusion is that it must be retained in this location, and made more accessible for public use (paragraphs 2.43 and 5.38);

A Sporting Future of the Playing Fields of England (Sport England)

8.7 Sport England’s playing field policy is set out within the above document. In order for loss of an existing playing field or part of playing fields to be acceptable, one or more of Sport England’s 5 exception tests must apply. The table below summarises these exception tests.

	Summary of Exception
E1	An assessment has demonstrated that there is an excess of playing fields in the catchment and the site has no special significance for sport.
E2	The development is ancillary to the principal use of the playing field and does not affect the quantity/quality of pitches.

E3	The development only affects land incapable of forming part of a playing pitch and would lead to no loss of ability to use/size of playing pitch.
E4	The playing field lost would be replaced with equivalent or better in terms of quantity, quality and accessibility.
E5	The proposed development is for an indoor/outdoor sports facility of sufficient benefit to sport to outweigh the detriment caused by the loss of the playing field.

9. Assessment: Sports and Playing Pitch Provision

- 9.1 This section considers the planning considerations relevant to the loss of existing sport and playing pitch provision associated with the playing fields, and the opportunities to provide replacement provision on site.
- 9.2 Policy S5 of the London Plan resists the loss of playing fields and existing sport and recreation facilities, unless the existing uses are surplus to requirements, replaced with equivalent or better facilities, or development is for alternative sports and recreation uses where benefits would outweigh the loss of the current or former use.
- 9.3 Policy LP31 states that formal and informal sports grounds will be protected. The Council's Playing Pitch Strategy (August 2016) concludes that there is a good existing stock of playing pitch provision meeting existing and future predicted demand and that existing pitches should be protected, maintained and enhanced. The SBPB advises that there is no benefit in relocating the existing playing fields and it should therefore remain in its current location.
- 9.4 However, as explained in earlier sections of this OSPPA, the SBPB's aspiration to retain the existing playing fields is not feasible for either a primary or secondary school given the play/sports requirements required for any type of school, as confirmed by the ESFA.

Policy Flexibility and Sport England Exception Tests

- 9.5 Local Plan policy seeks to protect existing sports grounds and playing fields unless the proposals meet Sport England exception tests.
- 9.6 In addition, site allocation SA24 states that the playing field should be retained or re-provided, thus providing an (emerging) policy basis to consider replacement playing pitches within the development, as opposed to retention of the existing playing pitches. The supporting text to the policy confirms, at paragraph 8.4.18, that the Council will resist the loss of playing fields unless the proposal meets the exceptional circumstances test as set out in Sport England's policy (see section 9 of this report).

- 9.7 Sport England Exception E5 can be satisfied if the proposed development is for an indoor/outdoor sports facility of sufficient benefit to sport to outweigh the detriment caused by the loss of the playing field. The applicant has worked closely with Sport England, the Football Association and Football Foundation in seeking to address Exception Test E5.
- 9.8 Sports England were previously consulted by the GLA on the proposals. An objection was originally provided on the basis of acoustic concerns. This objection was subsequently withdrawn based on the provision of acoustic barriers to the satisfaction of the Council Environmental Health Officer, as set out within paragraph 133 the GLA Representation Hearing Report (dated 27 July 2021, Ref. GLA/4172/4172a/03). As set out in the Noise Assessment (page 30), prepared by Hoare Lea, a 2.5m acoustic barrier has been proposed along the western and northern boundary of the sports pitch under this application, and will be implemented to mitigate any sound emissions from the MUGA.

Meeting Exception E5: Assessment

- 9.9 In consideration of Exception E5, the following considerations are relevant:
1. What is the current use, and what benefits are derived from that use?
 2. What is the proposed use and what sport-related benefits would this deliver?
 3. Will the new facilities address existing deficiencies?
 4. Will there be public access and community use?
 5. What ancillary facilities are there?
 6. What alternative locations are there for the existing sports and how far are these from the site?

The above considerations, and others, are considered fully in a Briefing Paper (dated December 2021 (version 7.0) prepared by SLC, attached at **Appendix 16**.

- 9.10 During the pre-application stage of the project, the applicant and the team have engaged with various groups and organisations including Sport England, the Football Foundation, the Football Association and Barnes Eagles.

Details of current use and benefits

- 9.11 The existing playing field accommodates two youth sized football pitches. Aside from school sports/games use, only football is played. The pitches are used during the football season at weekends (September to May), during school term times (once a week) and for one-off sports day events. Consequently, the existing use is limited in terms of the types of sports which can be played, the times of year when the pitches are in use and, consequently, the benefits that are derived from the current facilities.
- 9.12 Over the course of a year, the existing pitches are used on approximately 111 days and for some of those days no more than a few hours) and therefore are not in use for the other 254 days (70% of the year).
- 9.13 In terms of considering the current / existing use, the following facts are relevant:
- The existing pitches are in private ownership, and always have been: there is no public access for sports or games;
 - The existing pitches are significantly under-utilised;
 - The existing pitches do not benefit from any floodlighting;
 - The existing pitches have limited carrying capacity – there is little or no scope to use them more intensively.
- 9.14 SLC estimates (Table 1 of SLC Briefing Paper) the total participants per annum (under existing use) as **7,450 participants**.

Details of proposed use and sport-related benefits

- 9.15 The proposal involves the provision of a full size floodlit football pitch of 100m x 64m (with appropriate run off and spectator space), indoor and outdoor MUGAs, indoor activity hall/studio and changing room facilities. The facilities will be available all year round, and available to local community groups and organisations through a community sharing agreement. It is evident, therefore, that a significantly wider range of sports provision could be provided compared with the exiting situation. This is a significant sporting benefit resulting from the proposals.
- 9.16 Table 2 in SLC's Briefing Paper identifies that, based on the above, the proposal could accommodate up to **180,857 attendances** per annum, with a potential increase to **197,257** attendances per annum with longer opening hours. This is in comparison with

the existing attendance of 7,450. This is a substantial increase in provision of sporting opportunity, equating to a potential increase in user-capacity of the new facilities compared with the existing of at least **2,327%**.

9.17 **Key Message 10a:** The proposal has the potential to increase sporting user-capacity by **2,327%** compared to the existing situation. Increasing user capacity is a significant sporting benefit, as required by Sport England Policy Exception Test E5 in terms of sporting benefit outweighing loss of the existing playing field.

9.18 Not only would the proposal increase the sporting user-capacity, it would provide facilities for a significantly increased range of sports (compared with the existing sporting use: football and football training) including:

- Football (11v11, 7v7, 5v5);
- Rugby training
- Badminton
- Gymnastics
- Futsal
- Fencing
- Table tennis
- Indoor football (5v5)
- Volleyball
- Handball
- Indoor basketball
- Indoor netball
- Indoor cricket nets
- Dance
- Yoga / Pilates
- Aerobic / fitness / exercise classes
- Outdoor basketball
- Outdoor netball
- Tennis

9.19 All of the above could be played all year round and users would benefit from the significantly improved changing facilities which also form part of the proposal.

9.20 **Key Message 10b:** The proposal would significantly increase the range of sporting provision compared to the existing situation, and this provision would be available all year round. This is a significant sporting benefit as required by

Sport England Policy Exception Test E5 in terms of sporting benefit outweighing loss of the existing playing field.

Addressing deficiencies

- 9.21 LBRuT's Playing Pitch Strategy identifies that there is an existing shortfall in 3G pitches in the Borough to meet identified demand. The Playing Pitch Strategy also identifies a need for greater access to floodlit training facilities. The proposed floodlit 3G pitch would address both of these existing deficiencies.
- 9.22 In respect of indoor sports facilities, one in ten of the Borough's residents who wish to access an indoor sports hall are unable to do so due to insufficient capacity. The new multi-use indoor sports hall would address this identified deficiency.
- 9.23 **Key Message 10c: The proposal would address identified sporting deficiencies (indoor sports halls and 3G football pitches) within this part of the Borough.**

Public access and community use

- 9.24 The sports and play facilities would be linked with the proposed secondary school. Shared use would be possible through arrangements explained previously. The facilities will not be publicly accessible at all times given the school use, but local groups, teams, clubs, organisations and bodies will have the opportunity to use the indoor and outdoor facilities via a community use agreement that the applicant has committed to.
- 9.25 A draft Shared Community Use Agreement has been prepared by SLC and is appended to the SLC Briefing Paper at **Appendix 16**.
- 9.26 Shared use of the sports facilities will be possible in the evenings (7 days per week), weekends (throughout the year) and all day during school holidays. Access will be available to all facilities, indoor and outdoor. It is likely, given the range of facilities possible, that a wide range of groups and organisations would benefit from participating in a shared use arrangement.

9.27 **Key Message 10d**: A Community Use Agreement is proposed in order to ensure delivery of sporting benefits to a wide range of groups and organisations through making available the indoor and outdoor facilities. The Applicant is committed to entering into a Community Use Agreement.

Ancillary facilities

9.28 Users of the indoor and outdoor sports facilities will have access to modern, well-equipped changing facilities within the main school building. The changing rooms will provide showers, changing areas, lockers, storage areas etc. These have been designed to meet ESFA requirements for school use, and Sport England requirements for shared community and sports use.

Existing users and alternative locations

9.29 It is important to note that the Stag Brewery pitches do not provide the full Barnes Eagles' pitch requirement; the club only plays some matches at the application site. It's main pitch use and training sessions are held elsewhere, at Barn Elms.

9.30 The proposal allows for some or all of Barnes Eagles' current use to continue at the site given the additional capacity it would generate. The applicant has made sustained efforts throughout the pre-application process to engage with Barnes Eagles and preferential access to the facilities has been offered. The applicant awaits the commitment of Barnes Eagles to this arrangement and is committed to continued engagement as required.

9.31 In the event that Barnes Eagles needed to consider alternative locations, SLC has identified a number of existing sports venues nearby which could accommodate Barnes Eagles' requirements, including Barn Elms Playing Fields, Old Deer Park, Palewell Common, Sheen Common, University of Westminster Sports Ground and Kings House Sports Ground.

Assessment Summary

9.32 Planning policies seek to protect (and enhance) existing sports/play facilities, including playing fields such as those at Stag Brewery. However, the NPPF states

that development can take place if certain circumstances apply (NPPF paragraph 99) and, at the local level, playing fields will be protected unless the proposal meets the exceptional circumstances test as set out in Sport England's policy.

9.33 Sport England provide five 'exception tests' when loss of existing facilities can be acceptable. Only one of the five tests needs to be satisfied in order for the proposals to be considered acceptable. Exception test E5 is relevant in the context of the proposed redevelopment of the Stag Brewery site. E5 states:

“The proposed development is for an indoor or outdoor sports facility, the provision of which would be of sufficient benefit to the development of sport as to outweigh the detriment caused by the loss of the playing field or playing fields”.

9.34 There are three questions to answer in order to address the above exception test:

- What detriment is caused by the loss of the existing playing fields;
- What benefits would the new indoor or outdoor facilities provide; and
- Do the benefits outweigh the detriment caused by the loss?

9.35 There is a degree of detriment caused by the loss of the playing field, as the existing grass youth sized football pitches will not be re-provided. However, as explained in this section, and in the SLC report, the loss is limited by the fact that existing use is very limited, the playing pitches are privately owned, and the preferred Masterplan includes a full size 3G football pitch which, through community use agreements, could be used by Barnes Eagles and others.

9.36 The proposed indoor and outdoor flexible sports and play accommodation provide significant benefits, not least of all their ability to accommodate demand for a range of different sports and games and on a frequent (daily) basis. The facilities will be available to local groups outside of school hours: every evening, all day during school holidays and at weekends. Furthermore, the facilities will be of a high standard and specification, meeting modern sporting needs.

9.37 SLC's assessment concludes that the proposal "is of significantly greater sporting benefit to the community than the existing provision and should meet the requirements of Sport England's Policy Exception E5 on this basis" (**Appendix 16**).

9.38 The sports-related benefits include:

- The provision of a wider range of facilities, both indoor and outdoor;
- Ability for year round use;
- Opportunities for wider shared use by local groups and organisations;
- Increased user capacity compared with existing pitches (increase of 2,327%, with additional capacity with longer opening hours);
- Provision of facilities for a significantly increased range of sports and sporting activities;
- Existing poor quality changing accommodation would be replaced with high quality facilities;
- Introduction of 3G play surface (for which there is unmet demand in the borough) which allows a range of sports/games to be played on a high quality, versatile and robust surface, with a lower risk of cancellations due to the pitch being capable of use in poor weather.

9.39 It is therefore considered that the Proposed Development meets Policy S5 of the London Plan. The benefits proposed, as set out above, greatly outweigh the loss of the existing playing fields.

9.40 On the basis of the above, and the provisions within the SLC Briefing Paper, it is clear that the benefits of the proposal significantly outweigh any perceived harm caused by the loss of the existing grass pitches.

10. Conclusion

- 10.1 The proposed redevelopment of the Stag Brewery site includes the provision of a new secondary school, with external sports and play facilities suitable for a school of this type and size. As a consequence, the existing playing fields will not be retained in their current form.
- 10.2 The redevelopment proposal involves the loss of the existing grass playing pitches, and this space would be occupied by a new full size 3G football pitch, publicly accessible community park, outdoor MUGA and a small part of the proposed school building (approximately 0.2ha). Aside from the built footprint, all other elements would qualify as replacement OOLTI.

School location

The proposed location for the school is optimum, acceptable in planning terms having regard to all relevant material considerations, and would deliver significant planning benefits.

- 10.3 Whilst the SBPB identified a requirement for a two-form entry primary school, LBRuT now require a six-form entry secondary school plus sixth form (approximately 1,200 pupils) which requires a significantly greater amount of land. A series of options have been considered for the location of the new secondary school and the proposed location is considered the optimum location and design solution and would deliver a range of benefits as detailed in section 5 of this report, namely:
- Provision of a new secondary school of a suitable size and specification and meeting the capacity requirements of LBRuT;
 - Minimal development encroachment on the footprint of the existing playing fields (just 0.2ha – representing an encroachment of just 10% of the existing playing field footprint), thereby most closely representing the SBPB vision in terms of playing pitch retention;
 - No residential development proposed on any part of the existing playing field footprint;
 - Provision of a full size 3G football pitch (to enable year round football use, including for existing and additional users), and external multi-use play space to the south west of the school building, thus delivering significant sports benefits compared to the existing situation;

- Maximum regard had to the amenities of existing residents on Williams Lane, by positioning built form furthest away from them;
- Close reflection of the preferred arrangement of the Mortlake Brewery Community Group, CLG members and local residents;
- Floodlighting for the new pitch, to enable community use and sporting benefits, without detrimentally impacting on any existing or new residential occupiers;
- Retention and enhancement of amenity views into the site from Lower Richmond Road (preservation of OOLTI), most closely reflecting the existing site situation;
- Appropriate separation distances between proposed new residential buildings to the north of the football pitch, the nursing home to the east of the proposed school building and the existing residential properties on Williams Lane;
- Enhanced opportunities for hard and soft landscaping within the school application boundary;
- Provision of a new community park at the very front of the site, fully accessible to members of the public, site users and occupants and school children;
- School entrance and access and drop-off arrangements avoiding any additional traffic using Williams Lane;
- Significant replacement green and OOLTI qualifying space throughout the site, far exceeding existing OOLTI quantum (see Section 7 of this OSPPA);
- Significant publicly accessible open green space throughout the development in comparison to the current situation (no publicly accessible space) (see Section 7 of this OSPPA);
- Total overall amenity space throughout the development (vast majority of which is publicly accessible) of approximately 4.83ha (including towpath) / 4.54ha (excluding towpath)¹⁵.

10.4 Building on the existing grass football pitches raises two interlinked policy issues which have been comprehensively assessed in this OSPPA:

- a. Loss of designated open space (i.e. visual amenity, green infrastructure, Other Open Land of Townscape Importance – OOLTI); and
- b. Loss of existing playing pitches (i.e. sports provision and recreational value).

¹⁵ See Footnote 1.

OOLTI loss and re-provision: Main site

The proposal qualifies, under Local Plan policy, as one where it is appropriate to consider re-distribution of open space. The re-distribution proposed meets the policy tests relating to quantum, quality and openness. A significant amount of open space (OOLTI qualifying), the vast majority of which will also be fully accessible to the public, is proposed as part of the masterplan development, far in excess of the existing open space or open space envisaged in the adopted SBPB. Award winning landscape architects Gillespies have designed the landscape proposals for the masterplan and the application submission documentation demonstrates the quality of the landscape proposed.

10.5 In respect of the 'loss of designated open space' policy consideration, section 7 of this report concludes that:

- The existing playing fields are designated OOLTI.
- It is appropriate to consider the re-distribution of this designated open land for particular proposals: major schemes, regeneration proposals and schemes involving community and social infrastructure, including an education use. The proposed scheme meets all of these qualifying criteria.
- Where the above criteria are met, re-distribution may be acceptable provided the new open space is equivalent or improved in terms of quantum, quality and openness.
- The proposals comprise a significantly greater quantum of OOLTI qualifying open space (3.3ha¹⁶) than currently exists at the site (2.06ha), an increase of 62%;
- The proposals also comprise a significantly greater quantum of OOLTI qualifying open space (3.3ha¹⁷) than envisaged by the SBPB (1.85 retained playing field and new green link of unspecified size);
- The proposals comprise a greater quantum of OOLTI qualifying space than currently exists at the site and as envisaged by the SBPB even in scenarios where proposed play space, the green link and private amenity space are not counted as replacement OOLTI;

¹⁶ See Footnote 2.

¹⁷ See Footnote 2.

- The existing OOLTI (playing field) provides a limited contribution to local people (it is not publicly accessible), nor does it provide any other significant qualities (e.g. variety, landscape features, planting diversity, biodiversity etc);
- The dispersal of OOLTI space throughout the site (as opposed to being focussed in two locations only) is a sound landscape approach, and one which would deliver high quality landscape throughout the development to the benefit of residents, visitors and the wider local community;
- The quality of the proposed OOLTI is far superior to that provided by the existing playing field, as demonstrated in the Landscape Design and Access Statement, prepared by Gillespies;
- The proposed OOLTI satisfies the policy requirement of ‘openness’ via it being publicly accessible, and through the permeability proposed within the masterplan, which will provide the opportunity for greater access to and appreciation of the OOLTI;
- The proposed OOLTI space satisfies a greater range of OOLTI policy objectives than the existing space;
- Publicly accessible open space (much of which is OOLTI qualifying) is proposed, amounting to 3.94ha¹⁸, compared with the existing situation (no publicly accessible space);
- Overall total amenity space throughout the development (green space, OOLTI, public plazas, public realm and towpath) amounts to of approximately 4.83ha (including towpath) / 4.54ha (excluding towpath)¹⁹, equating to approximately 51% of the overall site area;
- All other relevant landscape and open space planning policies are fully complied with by the proposed development.

Sporting benefits

Planning policies allow for existing sports pitches to be replaced if sufficient sport benefits are derived which would outweigh the loss of the existing facility. In this case, the sport benefits of the existing facility are extremely limited (not publicly accessible, no floodlighting and limited carrying capacity) whereas the proposed development

¹⁸ See Footnote 3.

¹⁹ See Footnote 1.

would provide significant sporting benefits in terms of user capacity, the range of sports playable and through addressing identified local sports deficiencies.

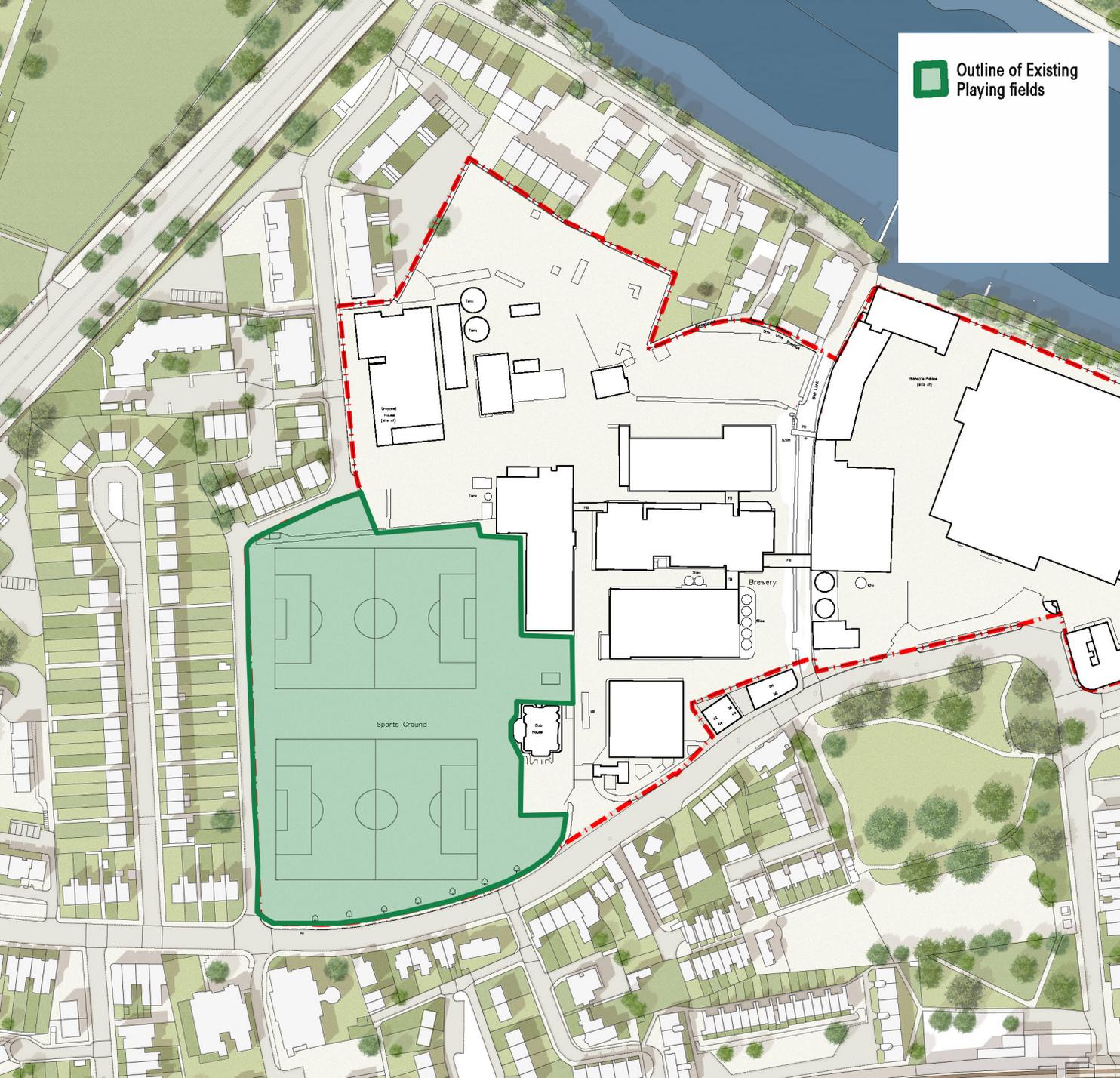
10.6 Section 10 of this OSPPA identifies that:

- Policy flexibility exists (i.e. loss of existing sports facilities and pitches can be considered acceptable in certain circumstances);
- In order for this flexibility to apply, it is necessary to meet at least one of Sport England's exception tests;
- Exception Test E5 is applicable in the context of the proposed development, and requires proposals to demonstrate that the development is for an indoor/outdoor sports facility of sufficient benefit to sport to outweigh the detriment caused by the loss of the playing field;
- The loss of the existing playing field is unavoidable (in spatial terms) if a secondary school of this size is to be located on the western part of the site;
- External sports/games facilities associated with a school of this type should be of a robust, weatherproof and year-round hard-wearing nature i.e. AstroTurf/3G/hard court as opposed to grass;
- There is a degree of detriment caused by the loss of the playing field but this loss is limited given its current use and limited benefit to sport;
- There are significant benefits to sport associated with the proposed facilities, as identified in SLC's Briefing Paper, including increased user-capacity of the new facilities compared with existing use (increase of up to 2,327%), their being capable of accommodating a range of types of games/sports, both indoor and outdoor, all year round, available for community use outside of school hours, and of a high quality; and
- The benefits outweigh any perceived harm caused by the loss of the existing grass playing pitches.

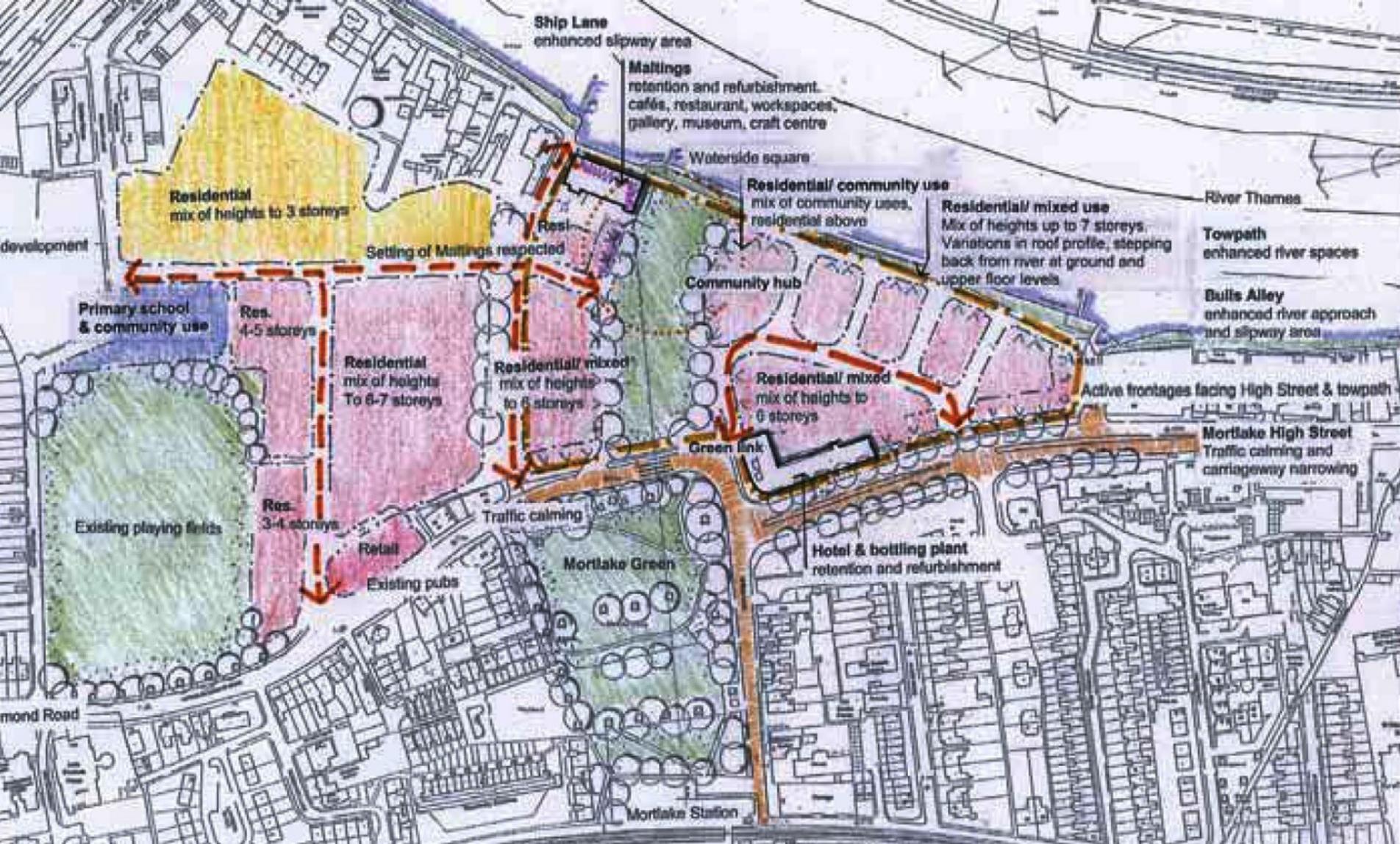
10.7 This OSPPA concludes that the loss of the existing playing fields would be compensated for in terms of open space provision and sports/play provision by the redevelopment proposal. The masterplan would provide significant benefits in terms of open space (a greater quantum of significantly higher quality) and in terms of sports benefits (enabling a wider range of sports, for a wider range of groups more often).

Appendix 1: Existing Situation

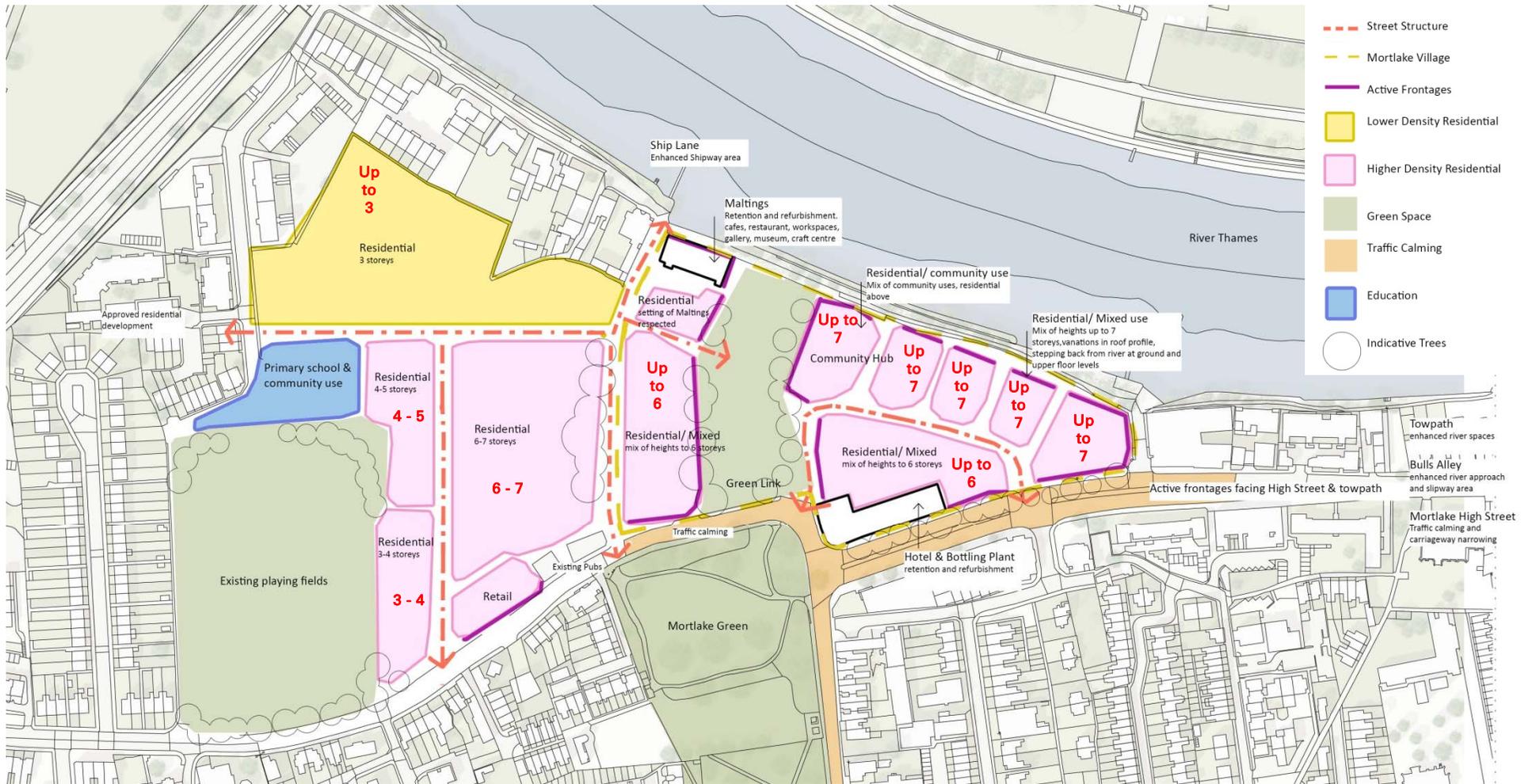
 Outline of Existing Playing fields



Appendix 2: LBRuT's Indicative Vision Plan

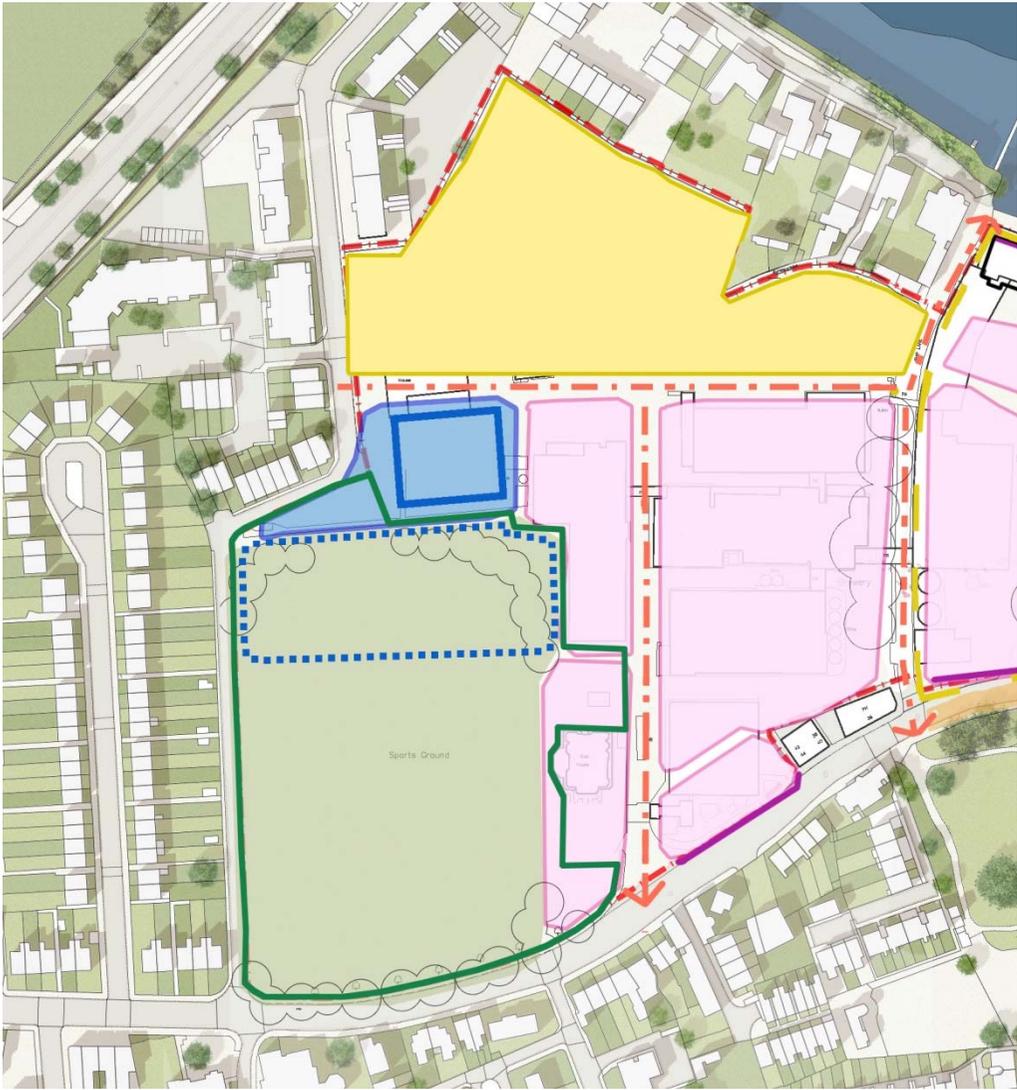


Appendix 3: Squire and Partners' Version of Vision Plan

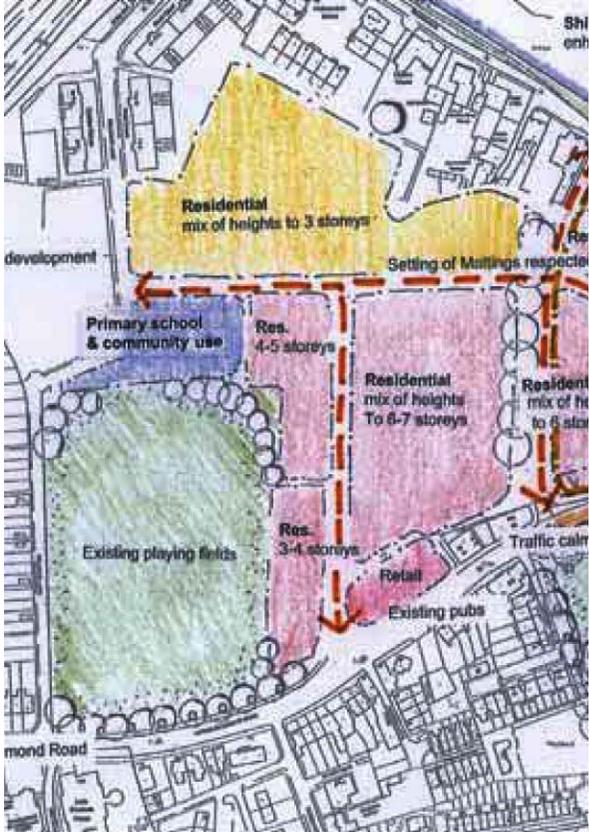


Planning Brief indicative masterplan

Appendix 4: Vision Plan: Development on Playing Fields



- Location for Primary School
- Residential zone
- Actual size of Primary School building
- Size of School play-space required



Planning brief with primary school

Appendix 5: Education Funding Authority Correspondence

Kevin Watson

From: Justin Anderson/GBR <justin.anderson@cushwake.com>
Sent: 20 June 2017 10:17
To: Kevin Watson
Subject: RE: Stag Brewery

Kevin

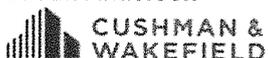
The below table should give you everything you need to calculate what would be required for a 2 form entry primary school. In essence there would be 420 pupils. Primary Schools are keys stages 1&2 but you can use the Primary Column for that calc. Secondary Schools are KS 3-5.

To be fully BB103 complaint, a 2fe primary as per the SPD equates to a Gross Internal Floor Area of 2072sqm and a Min Total Site area of 15,986sqm. As with most urban sites we are clearly some way short of this. The proposed secondary for 1150 Numbers on Roll by comparison requires a GIFA of 8820 sqm and a min total site area of 66500sqm or nearly 16.5 acres. Either way the DfE and Trust will be heavily compromised on outdoor play area. It is therefore critical that any on site pitches are artificial as the needs of a secondary school could not be met with a grass surface.

Regards

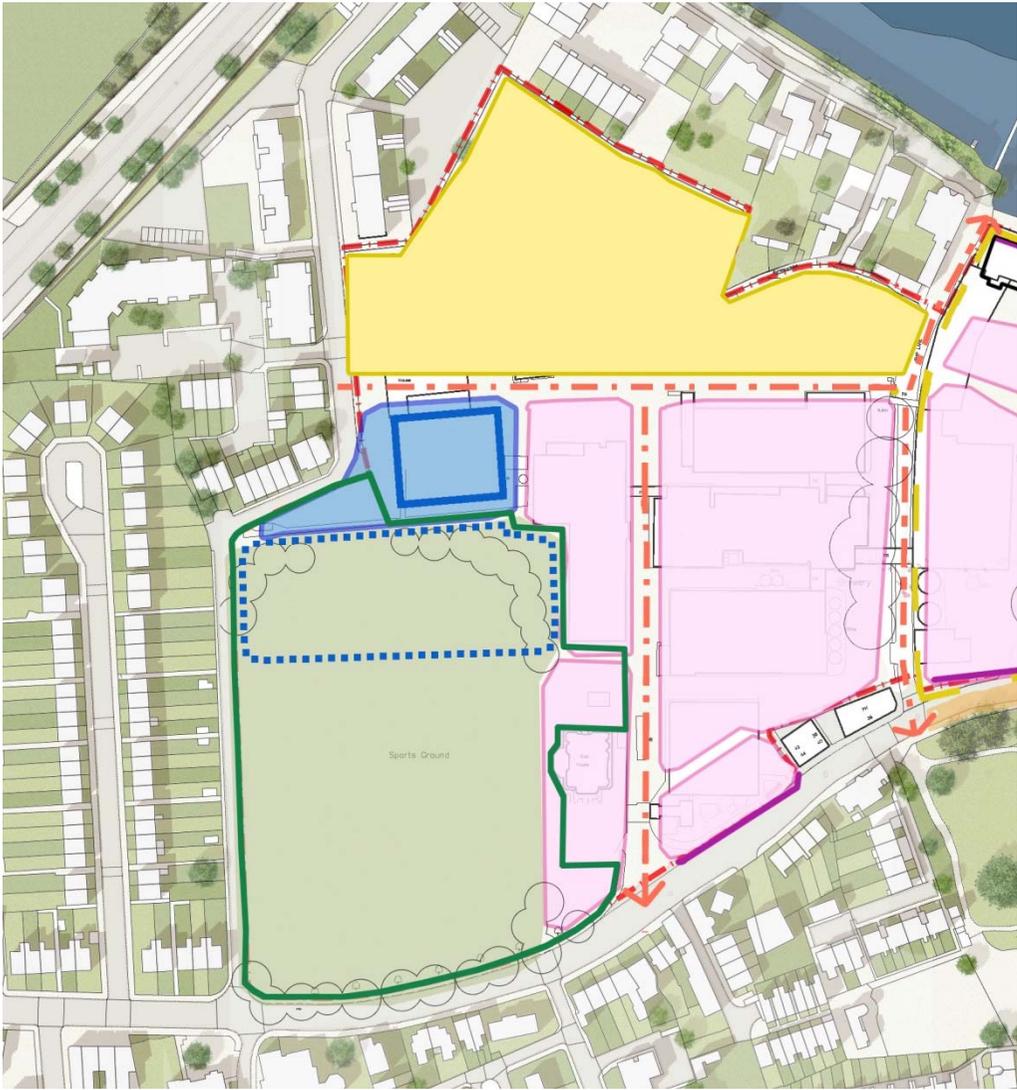
Recommended minimum site areas for all schools	Base area for any:		Area per pupil place for:			
	primary or special school	secondary or middle school	Nursery	Reception and Key Stage 1	Key Stage 2-4 & post-16	5 to 11 primary
1. Soft outdoor PE	-	6000	-	-	35	20
2. Hard outdoor PE	400	400	-	1.5	1.5	1.5
3. Soft informal and social area	600	600	2	2	2	2
4. Hard informal and social area	200	200	1	1	1	1
5. Habitat	0	0	0	0.5	0.5	0.5
Float	600	800	2	5	5	5
Minimum net site area	1800	8000	5	10	45	30
Non-net	350	2000	1	1	5	3.3
Minimum total site area	2000	9000	6	11	50	33.3
Recommended maximum site areas for new schools (minimum for existing schools where available)						
Maximum net site area	2000	9000	6	11	50	33.3
Maximum total site area	2400	11000	7.5	14	63	42

Justin Anderson

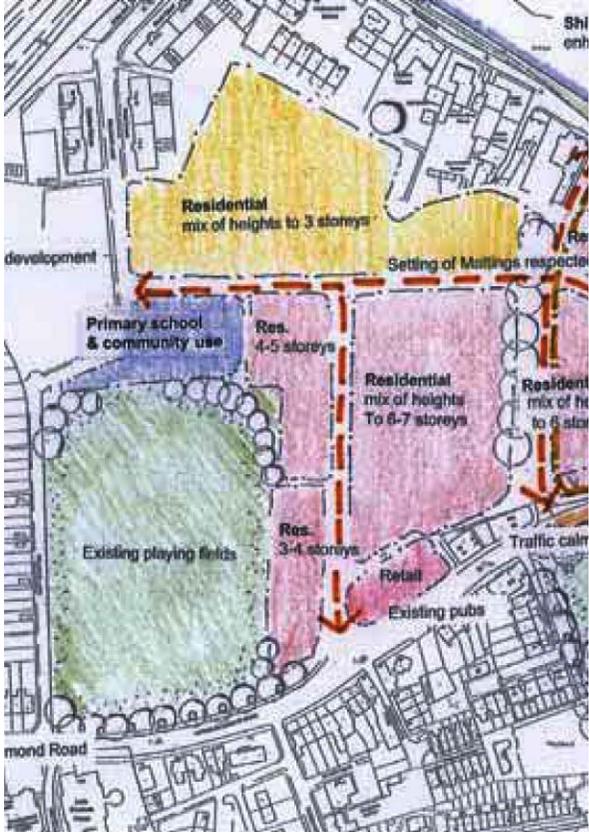


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Appendix 6: Primary School Space Requirements

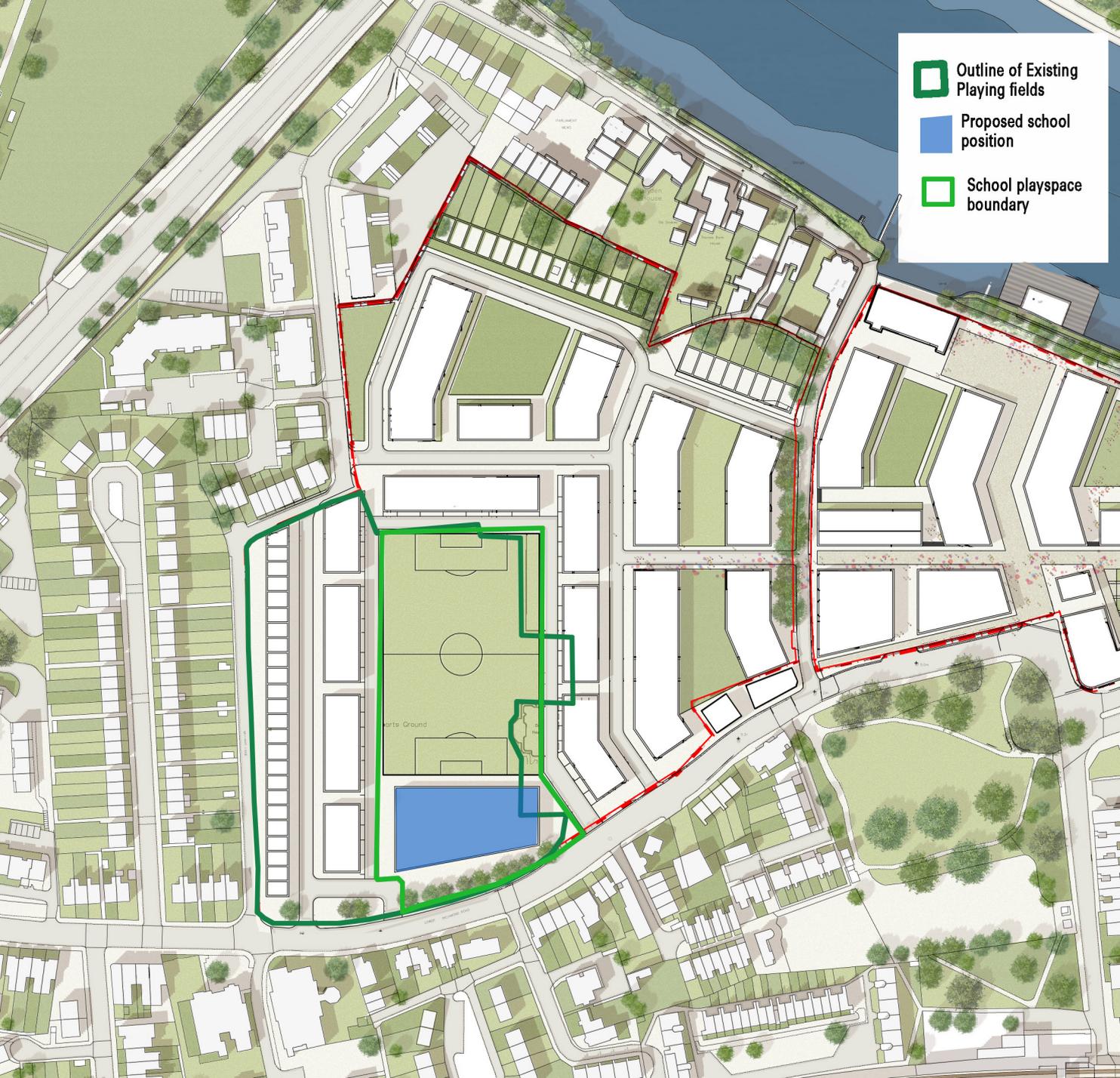


- Location for Primary School
- Residential zone
- Actual size of Primary School building
- Size of School play-space required



Planning brief with primary school

Appendix 7: Secondary School Option 1 (School to the South)



-  Outline of Existing Playing fields
-  Proposed school position
-  School playspace boundary

Appendix 8: Secondary School Option 2 (School to the West)