

**OBJECTION: The former STAG Brewery site, Mortlake**

Appeal reference: APP/L5810/W/24/3339062 & APP/L5810/W/24/3339060

Dear Inspectorate

I am writing to you as an elected member of Richmond Council, in my capacity as Ward councillor for Mortlake & Barnes Common, to object to the current proposals at the STAG Brewery site, Mortlake, which are subject to an appeal under the references shown above. I would like to take part in the appeal process as an interested party.

I have been contacted by residents from Mortlake & Barnes Common Ward regarding the planning proposals for the former Stag Brewery in Mortlake who have asked me to object to planning applications APP/L5810/W/24/3339062 & APP/L5810/W/24/3339060 for one or more of the reasons below.

When assessing cumulative impact of the scale of the development on the STAG site itself, the impact of the building height, massing and scale on the STAG site is not sympathetic to the local character, history, and context of the area in contravention of National, London and Local Plan policies. The scheme looks dated. Recent developments now incorporate more 'green' aspects in line with Richmond's Emerging Local Plan Strategic Policy G1 (Green Infrastructure) and Policy G4 (open space). In addition, Policy 2, housing delivery, and the infrastructure required to support it, is expected to be met without compromising the green and blue infrastructure network. However, the STAG Brewery proposals expressly exempt Policy 39 Biodiversity and Geodiversity and amend carbon offsetting provisions. These are all critical objections, which I support, however, as they are being addressed by Rule 6 parties, I will not repeat the objections here.

Since 9 June 2023, Richmond's Emerging Local Plan (Emerging Local Plan) has been a material consideration, for development proposals. Therefore, the Emerging Local Plan, along with Richmond's Adopted Local Plan (Adopted Local Plan) was relevant for both the 19 July 2023 and the 31 January 2024 planning committee hearings. BNP Paribas (the Developer's Financial Viability Assessment advisor) should have reported a conflict of interest to planning committee members as they were also advising Richmond Council on whole plan viability testing for the Emerging Local Plan, which the STAG development proposals are subject to.

The STAG Brewery is one of four major developments in the area which are included in the Emerging Local Plan as Site Allocations. These, together with smaller site allocations will cumulatively increase the number of homes by 2,500 homes and the number of residents by 5,700. The largest contributor is the STAG Brewery site, providing 1,075 homes and 2,398 new residents. There is a risk that the additional social, community and transport infrastructure is not proportionate because the applicant has not considered the cumulative impact of this scheme together with all the other planned development in the area anticipated in the Emerging Local Plan.

Particular shortfalls in social, community and transport infrastructure relate to:

1. **Lack of Community Facilities** – There are no dedicated community facilities within this scheme, except for a Boat House. The 'community park', referred to is a very small area which was previously designated as a bus turning area, and could revert to this. Community use of the school sports facilities has not been agreed to by the school. All the 'flexible space' is commercial and there is no dedicated community centre provision in the plan to accommodate the additional residents in the locality, even though this was included in the original adopted planning brief to support the 'Place Making' objectives of the scheme.

2. **Loss of STAG Brewery OOLTi Sports Field** - The footprint of the existing Watney's Sports Field should be retained, in line with policies to retain existing green space. Instead, this is reduced to accommodate the proposed secondary school despite a 2023 assessment that there is a lack of provision in this area. A consequence of the loss of the Sports field is that a local 420 pupil primary school, Thomson House, will no longer have the use of this field for sport activities. This will require them to continue to overuse Mortlake Green (a small public green adjacent to the railway level crossing and busy roads) for playtime and sports, with obvious safeguarding risks.
3. **Inadequate Healthcare provision** - The Primary Healthcare Care system in this area is already operating at capacity. There is no forward plan for primary healthcare provision for the forecast increase in population in the locality on the STAG site, or any neighbouring developments. A payment of £625,055 is not sufficient to mitigate the residual negative impact.
4. **Inadequate Transport infrastructure** - The Chalker's 'light' scheme proposed is inadequate for a site with a PTAL rating of 1 and 2. In line with policy, the lack of mitigation measures for disruption during construction is also inadequate given the PTAL rating. In line with policy, the Port of London Authority supports a river scheme to carry construction materials, and this should be a planning condition.

In addition, I have addressed the following key objections:

5. **Lack of Affordable Housing** - The indicative quantum of affordable housing of 6% of habitable units is far too low. There are over 5,500 people on the social housing waiting list in Richmond. In line with policy, local precedents, and identified need, there should be more affordable homes for social rent contributed by this development.

No scenarios were published to inform members about the impact of alternative schemes such as switching a cinema for community facilities, reducing basement costs by reducing car-parking, or using NCIL/Richmond's £22m unallocated housing fund to increase the affordable housing on site.

Members approved this scheme in reliance on a Review Mechanism to compensate for increasing sales values without any scenarios to show what the impact of rising sales prices would actually be.

In line with Housing assessed needs, there should be a condition to require Registered Providers to use fixed term tenancies for new affordable properties and to allocate affordable housing to key workers.

6. **Surplus Secondary School capacity** – The under 18 population is estimated to continue to fall to 2043, notwithstanding a modest increase in yield from the developments in the area. As a result, there is no evidence that there is need for a large secondary school taking 180 pupils a year. There is a cheaper, school community supported alternative to the proposed secondary school, to move the primary school without any outside space, Thomson House, to the site and use this smaller footprint to provide additional affordable housing.

In July 2011 Richmond Council, in consultation with local residents, adopted a Supplementary Planning Document (SPD) for the Stag Brewery site. The picture from the SPD included a masterplan vision. Squires' version of this masterplan for the site is set out below. This includes the proposed location of different elements of the site, heights, links between the river and station, the re-located existing primary school, community hub and existing playing field. The community are essentially trying to ensure that the vision agreed in the SPD comes to fruition.

Detailed provisions to support these objections are set out below. If you have any queries, please do not hesitate to contact me.

Yours sincerely,

**Cllr. N. Crookdake**

**Green Councillor for Mortlake & Barnes Common**

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## A. Planning Framework and Advisors

### Current Position

**Planning Framework** - The Officer's report confirmed in para 6.4 that the regulation 19 Emerging Local Plan has been a material consideration for the purposes of decision making since 9 June 2023, which covers both the STAG planning committee hearings on 19 July 2023 and 31 January 2024. The Original Planning Brief, 2011 was also stated as having material weight.

**Conflict of Interest** - BNP Paribas (BNP), with Anthony Lee as Partner, advised Richmond Council on the Whole Plan viability of the Emerging Local Plan. At the same time, BNP, with Mr Lee as Partner, was negotiating the STAG Brewery Financial Viability Assessment with Richmond Council on behalf of the Developer. In breach of professional standards, this potential conflict was not disclosed to Members, apart from the Chair of the planning committee and one other member, prior to the planning committee. I have sought advice from the Monitoring Officer regarding the conflict of interest. Following an investigation, he stated that there was no conflict of interest:

*'with regards to the BNP Paribas involvement in both viability assessments... I am satisfied that no conflict has arisen.'*

*'The viability assessment for the Stag brewery site was produced under the adopted plan, whereas of course the Council's instructions to BNP Paribas was to produce a viability assessment for the emerging plan. The Council's commission of BNP Paribas was of course for the emerging local plan. In the circumstances there was no conflict of interests. The Council was aware that BNP Paribas were commissioned at the time on other whole plan viability assessments and so if there were any differences in methodology/approach, this would be immediately apparent. And in any event, as you know with regards to the Stag Brewery, the Council received independent advice as has the GLA.'*

There were a number of areas in the Emerging Plan where policy changes were made which benefitted the developer – for example:

- Para 17.25-17.27 in the Emerging Plan replaced previous section 9.3.11 and 9.3.12 in the Adopted plan and carved out 'extraordinary circumstances' in which the 50% target for affordable housing could be reduced. The developer was able to rely on these provisions to prevent his application from being rejected; and
- Compliance with Policy 4E (Carbon Offset) requiring carbon offset at £95/t rather than £300/t, and Policy 39 (Biodiversity) was excluded as agreed by full council.

At the January '24 planning committee which considered the fire regulation amendments, the conflict of interest was again not brought to members attention.

**Richmond's Independent Advisor** - Richmond Council's independent adviser on the STAG FVA negotiation, Carter Jonas, did not produce a final report for the July 2023 planning committee hearing which considered both Applications A & B in full. The Carter Jonas draft report, dated March 2023, recommended 101 affordable homes, which was significantly higher than the offer of 65 affordable homes presented to the planning committee in July. The Officer's report did not refer to the higher offer and Members were not aware of it. Carter Jonas had by January 2024 produced a final report, which recommended BNP's overall affordable housing level assessment but stated they continued to disagree with a number of assumptions, in particular sales values. The Carter Jonas report was not uploaded on the Richmond Council website until the Friday afternoon prior to the Planning Committee meeting the following Wednesday, following a request from me.

### **Planning Assessment**

Given that BNP Paribas were employed by both Richmond Council and the developer at the same time, there was a potential conflict of interest arising from the undue influence BNP Paribas may have had in advising on the Emerging Local plan requirements that the STAG developer was subject to. This was of greater concern because Carter Jonas, Richmond Council's own advisor, had not issued a final report with recommendations for planning committee members prior to the planning committee in July 2023 – rather there was a draft report recommending a higher level of affordable homes, which was not reported to Members.

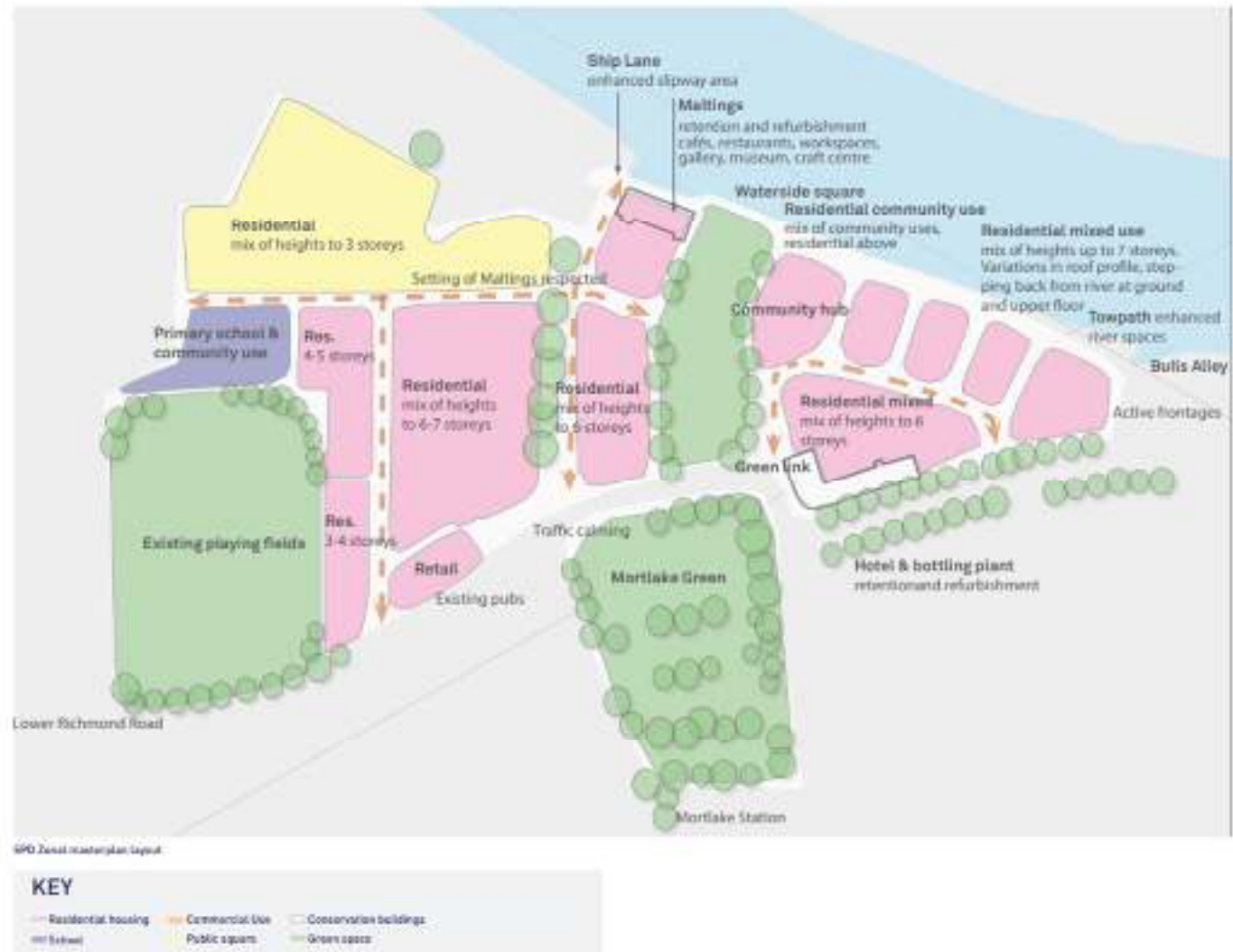
For transparency purposes, members should have been told about BNP's conflict of interest. This may have led to greater interrogation of, the BNP scenarios and Carter Jonas report, at both the July '23 and '24 planning committee meetings. The impact of this is addressed later in section 5, Affordable Housing.

## Relevant Polices/Evidence

Policy/Evidence	Description
<b>Officer's report – 31 January 2024 planning committee</b>	para 6.3-6.7 – confirms the status of the Emerging Plan as a material consideration in both July 23 and January 24 planning committee meetings.
<b>Richmond Monitoring Officer, e-mail 28-7-23 @10:10</b>	<p><i>“Through colleagues in planning I have made the necessary inquiries with regards to the BNP Paribas involvement in both viability assessments. Having done so, I am satisfied that no conflict has arisen.</i></p> <p><i>The viability assessment for the Stag brewery site was produced under the adopted plan, whereas of course the Council's instructions to BNP Paribas was to produce a viability assessment for the emerging plan. The Council's commission of BNP Paribas was of course for the emerging local plan. In the circumstances there was no conflict of interests. The Council was aware that BNP Paribas were commissioned at the time on other whole plan viability assessments and so if there were any differences in methodology/approach, this would be immediately apparent. And in any event, as you know with regards to the Stag Brewery, the Council received independent advice as has the GLA.”</i></p> <p>The comments above are incorrect, as the Emerging Plan was a material consideration for both the July and January planning committee. Members of the July '23 planning committee did not see any published independent advice prior to the committee, as this was not finalised and was only uploaded on the day of the meeting, nor did the officers report refer to the draft recommendations, which were different to BNP Paribas' recommendations.</p>
<b>Richmond Council's Advisor on the FVA - Carter Jonas draft report dated March 2023</b>	This report was not complete when the planning committee was held on 19 July 2023, it was uploaded onto the planning portal on the day of the meeting. Members were unaware that the council's independent advisor report was incomplete. The officers report did not refer to the offer of 101 affordable homes which was recommended in this report and was significantly higher than 65 homes presented to the committee.
<b>Officers Report – July '23 Para 6.6</b>	The original planning brief was listed in para 6.6 of the Officers Report in July 2023 as: 'Of particular relevance, is the Planning Brief (Brief), which was adopted in July 2011. This provides a vision for the site, guidelines on future uses, layout and design for the site's redevelopment, and is a material consideration which is consistent with the Framework (the closer the policies in the plan to the policies in the Framework, the greater the weight that may be given).'

In July 2011 Richmond Council, in consultation with local residents, adopted a Supplementary Planning Document (SPD) for the Stag Brewery site.

This picture is Squires version of Appendix 1 in the Adopted SPD and includes the proposed location of different elements of the site, heights, links between the river and station, the re-located existing primary school, community hub and existing playing field.





## B. Context - Cumulative Impact of Extensive Development

### Current position

Four of the major developments listed as Site Allocations (SA) in the Emerging Local Plan, are within 1.2 miles of the STAG Brewery site. They include Homebase SA 29, Barnes SA 38, Kew Retail SA 32, and STAG Brewery SA 35. In line with the London Plan 10-year targets for net housing completions (2019/20 -2028/29), the Emerging Local Plan is expected to deliver 4,110 homes by 2028/29. Over 50% of that target – 2,134 homes and 4,764 residents – are expected from four major developments within 1.2 miles of the STAG Brewery site. Other site allocations within the same locality will add a further 409 homes and another 900 residents. Mortlake is already the second most densely populated area in the Borough (6,607 residents per kilometre), before development begins.

Appendix A provides detailed calculations of the estimated population yield.

### Planning Assessment

The **cumulative** impact of the development at Site Allocations in the Emerging Local Plan on the social, community and transport infrastructure in the Mortlake/STAG Brewery locality has not been adequately considered in the various reports prepared for this planning application. Instead, the Environmental Statement reports inevitably conclude that there are no or limited harms from **this development** and little or no mitigation required, even though **cumulatively** this is not the case. The same is also true of other developments e.g. Homebase, Manor Road.

The additional 2,500 homes and 5,700 residents estimated by the GLA Population Yield Calculator in respect of all the Site Allocations set out in the Emerging Local Plan within 1.2 miles of the STAG Brewery site, the 1,200 pupil secondary school planned on the STAG site, the 90 pupil SEMH special school, and the new adult mental health facility on the Barnes hospital site will all put enormous strain on transport, health services and community facilities in the locality. The STAG area is particularly impacted as the PTAL rating is 0-2.

The table below lists the development sites in the Emerging Local Plan which are close to the STAG Brewery site and compares the size of the development listed in the Infrastructure Delivery Plan 2023 with the actual or estimated number of units planned. The estimates in the Infrastructure Delivery Plan 2024 forecast 1,116 fewer new homes than are planned.

Following issues highlighted in the locality in the Urban Design Study '23 used to inform the Emerging Local Plan, the Infrastructure Delivery Plan was updated in 2023 and 2024. However, as it understated the size of the developments in the area, there is a risk that transport, community, and social infrastructure needs as required by the London (3.2.1), Emerging (26.16) and Adopted Local Plan have been underestimated.

Site No.	Site Allocation Emerging Plan	Postcode	Miles to		Actual/		Variance	
			STAG	IDP'24*	Estimated			
35	STAG	SW14 7EX	-	550	1075	-	525	
29	Homebase	TW9 1YB	1.2	385	453	-	68	
38	Barnes Hospital	SW14 8SU	0.7	83	106	-	23	
32	Kew Retail	TW9 4AD	1.0	-	500	-	500	
32	Kew Biothane	TW9 4BD	0.9	88	88	-	-	
-	Richmond Royal	TW9 2TE	1.5	71	71	-	-	
30	Sainsburys	TW9 4LT	0.9	250	250	-	-	
36	Mortlake Delivery Office	SW14 8JB	260 yards	-	0	-	-	
37	Telephone Exchange 172-176 URR	SW14 8AW	0.6	-	0	-	-	
<b>Current Estimate of total homes</b>					<b>1,427</b>	<b>2,543</b>	<b>- 1,116</b>	<b>-78%</b>

Source: Emerging Local Plan and Infrastructure Delivery Plan - January 2024 Addendum

## Relevant Policies/Evidence

Policy/Evidence	Description
<p><b>National Planning Policy Framework</b></p>	<p>20. Strategic policies should set out an overall strategy for the pattern, scale and design quality of places, and make sufficient provision for:</p> <ul style="list-style-type: none"> <li>a) housing (including affordable housing), employment, retail, leisure and other commercial development;</li> <li>b) infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);</li> <li>c) community facilities (such as health, education and cultural infrastructure); and</li> <li>d) conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation.</li> </ul> <p>22. Strategic policies should look ahead over a minimum 15-year period from adoption<sup>15</sup>, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure. Where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery.</p> <p>26. Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary, and whether development needs that cannot be met wholly within a particular plan area could be met elsewhere.</p>
<p><b>London Plan 2021 - D2 Infrastructure requirements for sustainable densities</b></p>	<p><b>Infrastructure requirements for sustainable densities</b></p> <ul style="list-style-type: none"> <li>A. Where there is currently insufficient capacity of existing infrastructure to support proposed densities (<b>including the impact of cumulative development</b>), boroughs should work with applicants and infrastructure providers to ensure that sufficient capacity will exist at the appropriate time. This may mean that if the development is contingent on the provision of new infrastructure, including public transport services, it will be appropriate that the development is phased accordingly.</li> <li>B. When a proposed development is acceptable in terms of use, scale and massing, ... but it exceeds the capacity identified in a site allocation or the site is not allocated, and the borough considers the planned infrastructure capacity will be exceeded, <b>additional infrastructure proportionate to the development should be delivered through the development</b>. This will be identified through an infrastructure assessment during the planning application process, <b>which will have regard to the local infrastructure delivery plan</b> or programme, and the CIL contribution that the development will make. Where additional</li> </ul>

	<p>required infrastructure cannot be delivered, the scale of the development should be reconsidered to reflect the capacity of current or future planned supporting infrastructure.</p> <p><b>3.2.1</b> Infrastructure provision should be proportionate to the scale of development. The locations and scale of growth will be identified through boroughs’ Development Plans, particularly through site allocations. Infrastructure capacity, having regard to the growth identified in the Development Plan, should be identified in boroughs’ infrastructure delivery plans or programmes. Boroughs and infrastructure providers should also consider the <b>cumulative impact of multiple development proposals in an area.</b></p>
<p><b>Richmond Emerging Local Plan Policy 49 Social and Community Infrastructure and Policy 55 Delivering and Monitoring</b></p>	<p>Policy 49 - The Social and Community Infrastructure states the Council will work with service providers and developers to ensure the adequate provision of community services and facilities, especially in areas where there is an identified need or shortage. Proposals for new or extensions to existing social and community infrastructure will be supported where it provides for an identified need and is of high quality and inclusive design providing access for all. This will help to ensure residents have sufficient access to local services and facilities and will lead to the betterment of their health and wellbeing.</p> <p>Policy 55 – Delivering and Monitoring                  26.2 .. over the course of this plan, the council will be expected to deliver 4,110 homes. This will put pressure on existing infrastructure such as water, waste, energy and transport ..                  Infrastructure Delivery                  26.16 The <b>Infrastructure Delivery Plan (IDP), updated in 2023, is part of the evidence base that has informed the policies contained within this Plan.</b> For the purpose of the Local Plan and the IDP, 'essential community infrastructure' is defined as 'any physical structure, facility or service, whether privately or publicly funded, that supports or enables growing communities'. The IDP provides an infrastructure assessment, identifying future infrastructure and service needs for the borough.</p>
<p><b>Urban Design Study 2023 – evidence for the Emerging Local Plan</b></p>	<p>Page 210 – the Impact of the <b>increased density on existing social infrastructure and transport</b> network needs to be assessed ..                  Page 235 – the consultations in East Sheen, Kew, Barnes and Mortlake identified a reduction in traffic and improvement in public transport as a current key area of concern and an area of most importance in future.</p>
<p><b>Richmond Emerging Local Plan – 13 – Place based strategy for Mortlake &amp; East Sheen</b></p>	<p>This section incorrectly forecasts a lower level of development than is anticipated. This has resulted in the cumulative impact of the unprecedented development in this area of the Borough not being properly considered, particularly in the Infrastructure Delivery Plan ’23 and ’24, which carried forward errors.</p>

## **C. Issues of Concern**

### **1. Lack of Community Facilities**

#### **Current position**

Section 106 obligations are set out in the para 9.2 of the Officers January 2024 report.

Table 28 lists the various obligations. The following are stated as **not agreed** with the Applicant:

- The community use of the school facilities after hours and at weekends.
- The towpath improvements.

The community park is a small section of the field previously designated as a bus turning area, (3,168sqms) which could revert to this use.

There is no mention of a Boat House, although I understand this is agreed.

There is no dedicated community centre for the new 'heart of Mortlake'. All the 'flexible space' is commercial, which is not suitable for a community centre.

#### **Planning Assessment**

The 'community park', is a generous description for a previous bus turning circle next to the boundary of the secondary school site, which looks onto high fencing surrounding the school site.

Community use of the school sports facilities can presumably only be agreed to by the school on site as they will be responsible for them. Given the staff costs of operating these facilities after hours, it is very unlikely that in reality this will occur. A similar situation has arisen at another local development, where the headteacher has already said that opening the facilities will not be financially viable.

Given the scale of this development, local residents are disappointed that a new community centre has not been included in the development, particularly as it was included in the adopted planning brief. The shortfall in community facilities may not have been properly identified as the scale of the developments have been understated in the infrastructure delivery plan in 2023 and 2024 and in Section 13 of the Emerging Local Plan – Barnes & Mortlake.

Whilst the decision to reduce spending on youth provision in the area has been temporarily reversed, the opening times of the youth centre have not returned to previous levels. Mortlake has the second highest level of social housing in the borough and therefore free-of-charge youth and community services are essential if, as set out in the Health Assessment, we wish to deter young people from unwanted behaviours and provide activities for our ageing population forecast by the ONS/Datarich. Community facilities would also support placemaking, which is one of the objectives in the original planning brief, more than a cinema. A cinema is not required as there are four in the area already. In addition, the cinema reduces viability (see below).

It is particularly frustrating that £48m in CIL generated from this site is funding other community facilities elsewhere in the borough as listed in the Infrastructure Development Schedule updated in January 2024, and set out in the Capital Spending programme approved as part of the budget in March e.g. Ham close - £7m community centre, £4.5m redevelopment of Elleray Hall in Teddington.

In line with the Infrastructure Delivery Plan which aims to base Safer Neighbourhood police teams close to the communities they serve, ward councillors have suggested the establishment of a police

base, close to the Brewery site and the boundary of three wards – Kew, North Richmond, and Mortlake, as their safer neighbourhood teams are all currently based outside their wards.

## Relevant Policies/Evidence

Policy/Evidence	Description
<p><b>Richmond Emerging Local Plan Policy 49, 50 and 55 - Social and Community Infrastructure</b></p>	<p>The Social and Community Infrastructure policy 49 states the Council will work with service providers and developers to ensure the adequate provision of community services and facilities, especially in areas where there is an identified need or shortage. Proposals for new or extensions to existing social and community infrastructure will be supported where it provides for an identified need and is of high quality and inclusive design providing access for all. This will help to ensure residents have sufficient access to local services and facilities and will lead to the betterment of their health and wellbeing, including health, schools, social care, and community services.</p> <p>Policy 49 refers to the need for the Council to maintain an Infrastructure Needs Assessment and Delivery Plan (IDP) to assess existing provision of social and community facilities.</p> <p>Policy 50 encourages the multi-use of education facilities with other social infrastructure and community uses where practicable., Multi-use and co-location of facilities can increase the wider community benefits of education proposals, for example after hours use of the sports facilities. The Urban Design Study 2021 also seeks to encourage colocation where possible.</p> <p>Policy 55 – Delivering and Monitoring 26.2 .. over the course of this plan, the council will be expected to deliver 4,110 homes. This will put pressure on existing infrastructure such as water, waste, energy and transport .. 26.16 The <b>Infrastructure Delivery Plan</b>, updated in 2023, has informed the policies</p>
<p><b>Infrastructure Delivery Plan, April 23</b></p>	<p><b>Policing - Future Requirements – page 34</b></p> <p>.. There will continue to be a 24/7 front counter available in every London Borough, with Safer Neighbourhood Teams based in buildings close to the communities they police. Investment plans will be reviewed with an aim of accelerating the delivery of Carbon Net Zero police stations by 2030. In addition, 94 new Contact Points are to be opened at regular advertised times staffed by the local Safer Neighbourhood Team.</p> <p>Consideration will be given to further sites in co-located premises with other public service providers. The ‘Police and Crime Plan’ also identifies a set of Local Deployment Bases from which officers deploy at the start of their shifts. Generally, these are not open to the public because neighbourhood officers are expected to be out on patrol rather than sitting behind desks.</p>

	<p><b>Play spaces – Future Requirements - page 46</b></p> <p>There is a need to find a way to provide safe play sites with minimal formal supervision, but some form of safety net for the middle ages – 8 to 15, when children should be able to go start going out to play with friends. <b>Provision for older children and young people also needs improvement.</b> They need some places where they can be safe and welcome. Furthermore, basic accessibility needs, including accessible toilet facilities and parking, should be improved for children with special needs. The ability to pay for some facilities – sports clubs, adventure playground provision, and youth club subs etc. is a barrier to access for many children, particularly from low-income families. Children living in areas of relative disadvantage are less likely to be able to afford paid for play facilities and are unlikely to travel to other areas for free play opportunities. Children from ethnic minorities may face additional barriers to play based on language and cultural difference.</p>
<p><b>Infrastructure Delivery Plan Schedule, January 2024 Update -</b></p>	<p><b>Social and Community Infrastructure</b></p> <p>There are no current social and community or public realm improvements listed in the schedule, in the area outside the Brewery site, to link the development with the existing community despite generating the CIL required to fund these projects elsewhere in the borough.</p>



## **2. Loss of STAG Brewery OOLTi Sports Field**

### **Current Position**

The STAG Brewery's playing field within the site is locally designated as Other Open Land of Townscape Importance (OOLTi), as per Policy LP14 of the Adopted Local Plan and Policy 36 in the Emerging Local Plan. The OOLTi designation is to safeguard open land which contributes to local character and open land which is valued by residents in the context of a built-up area.

The Richmond Playing Pitch & Outdoor sports strategy, completed in September 2023, concluded that the east of the borough, defined as 'Richmond' has a shortfall of turf pitches for sports for all age groups, except Mini 5v5 where demand matches capacity currently. It is currently the worst served area in the borough for pitch sports, because the other two areas – Hampton/Teddington, and Twickenham both have spare capacity in at least one age category.

In addition, Thomson House Primary School currently uses the OOLTi field on the Brewery site for sports. Under the current plan, the 420 primary school children will have nowhere to play outside, except Mortlake Green. This is a small area of green space, next to Mortlake station, surrounded by busy roads and a dangerous level crossing, which children need to cross to access Mortlake Green. There have been a number of dangerous traffic incidents close to the level crossing, involving the primary school children, one of which was caught on video recently. There is concern that if the lack of safe, outside play space was reported to Ofsted, they would close the school.

Being located next to the road and level crossing, with idling cars, air quality is often poor around Mortlake Green which is one of four focus locations that have been identified as having high levels of air pollution. Therefore, this is not an ideal location for children to play or have sports lessons.

### **Planning Assessment**

The local community wish to retain the playing field in its current size as it will be the only large open space in the area, as confirmed by the Richmond Playing Pitch & Outdoor sports strategy above.

This is also an area with the second highest density of residents in Richmond, before development begins. The removal of the field is in contravention of the policies listed below as they are not equivalent in terms of openness, quantum or quality as required by the Emerging and Adopted Local Plan and do not mitigate against the loss of the only large green open space in the locality. In addition, the proposed payment of £24,000 towards improving grass pitches elsewhere and a contribution towards improvements at Mortlake Green is not sufficient mitigation for the harms caused to the local population.

To approve a plan without providing a play area for 420 primary school children, given the safeguarding risks, is in breach of the London Local Plan T4, which states that development proposals should not increase road danger. There are significant harms caused by the current proposal.

An alternative proposal, included in the original planning brief, was to relocate the primary school to the Brewery site, thereby ensuring the primary school had a safe outside play area and the field was retained (see School section below).

## Relevant Policies/Evidence

Policy	Description
<b>National Planning Framework 2021 - Open space and recreation</b>	<b>99.</b> Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless: (a) an assessment has been undertaken which has clearly shown the open space, buildings, or land to be surplus to requirements; or (b) 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 (c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.
<b>London Plan 2021 G4 Open Space S5 Sports and recreation</b>	G4 B Development Proposals should not result in the loss of protected open space S5 – as above NPF
<b>London Plan 2021 T4 Assessing and mitigating transport impacts</b>	E The <b>cumulative impacts of development</b> on public transport and the road network capacity including walking and cycling, as well as associated effects on public health, should be taken into account and mitigated. F. Development proposals <b>should not increase road danger</b> 10.4.3 It is important that development proposals reduce the negative impact of development on the transport network and reduce potentially <b>harmful public health impacts</b> . The biggest transport-related impact of development on public health in London is the extent to which it enables physical activity from walking, cycling and using public transport. The other main impacts on public health relate to air quality, road danger, noise, and severance.
<b>January'24 Officers report</b>	8.236 The July report concluded: <ul style="list-style-type: none"> <li>• Open space: The playing fields in the western half of the site, provide 2.06ha of green space available to Barnes Eagles FC, Thomson House School and St Mary Magdalen. However, this a not open for general public use.</li> </ul> In comparison the scheme incorporates 39,424m2 of publicly accessible open space, 1.59 ha per 1,000 population, which is deemed acceptable. <ul style="list-style-type: none"> <li>• Playing pitches: To mitigate the potential impact on playing pitches (in response to the loss of 2 grass pitches, of which the Playing Pitch Strategy and Assessment Report identifies a future shortage in youth, adult and 11v11 pitches in the Richmond Area), and increased pressure on existing grass pitches, a contribution of £24,000 was secured towards improving existing grass pitch quality provision elsewhere. In addition, a clause within the S106 was secured to address the scenarios if the school and the associated sporting facilities are not provided within 5 years.</li> </ul>

	<ul style="list-style-type: none"> <li>• Public parks / open space. The application is likely to place additional pressure on Mortlake Green, which is largely at capacity and as such, a contribution towards improvement to Mortlake Green (as set out below) was secured to offset impact.             <ul style="list-style-type: none"> <li>o £16,575 additional play</li> <li>o £175,667 (path works, maintenance, landscaping) o Additional £4,074.13 – if Council to lay 4m wide tarmac path to new road crossing.</li> </ul> </li> <li>• Community Park: The proposed community park, in the southwest corner of Development Area 2, ...</li> </ul> <p>8.237 Since the July Report, there has been no significant change in policy concerning open space, however, the evidence base for the emerging Local Plan has been published, including, the Playing Pitch and Outdoor Sport Assessment and Strategy. The themes coming out of these updated documents are similar to their superseded reports, whereby there <b>continues to be a current and future shortfall of adult, youth and mini grass pitch capacity and a significant unmet demand for 3G provision, both within the Richmond Assessment Area</b> and Borough wide.</p> <p>In response, and the modest uplift in population arising from the amendments; and no change in the quantum of open space throughout the site as confirmed in the Open Space and Official Sensitive Playing Pitches Assessment letter of conformity, the conclusions reached in the July Report remain the same, and compliance with the aims of policy and aspirations of the Brief. The scheme continues to provide valuable public open space and community park; a floodlit 3G pitch and other sporting facilities to mitigate the loss of the grass pitches; and mitigation to avoid unacceptable additional pressure on existing grass pitches and Mortlake Green</p>
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**Richmond Playing Pitch & Outdoor sports strategy, Sept'23**

*Table 3.1: Current quantitative headline findings (pitch sports)*

Analysis area	Pitch/facility type	Current supply/demand balance
<b>Football – grass pitches</b>		
Hampton & Teddington	Adult	Shortfall of 9 match equivalent sessions
	Youth 11v11	Shortfall of 4.5 match equivalent sessions
	Youth 9v9	Shortfall of 1 match equivalent sessions
	Mini 7v7	Actual spare capacity of 2.5 match equivalent sessions
	Mini 5v5	Demand is being met
Richmond	Adult	Shortfall of 0.5 match equivalent sessions
	Youth 11v11	Shortfall of 3 match equivalent sessions
	Youth 9v9	Shortfall of 9 match equivalent sessions
	Mini 7v7	Shortfall of 4.5 match equivalent sessions
	Mini 5v5	Demand is being met
Twickenham	Adult	Shortfall of 2.5 match equivalent sessions
	Youth 11v11	Demand is being met
	Youth 9v9	Shortfall of 1 match equivalent session
	Mini 7v7	Actual spare capacity 0.5 match equivalent sessions
	Mini 5v5	Demand is being met
LBRuT	Adult	Shortfall of 12 match equivalent sessions
	Youth 11v11	Shortfall of 7.5 match equivalent sessions
	Youth 9v9	Shortfall of 11 match equivalent sessions
	Mini 7v7	Shortfall of 1.5 match equivalent sessions

**Richmond Emerging Plan – Policy 36**

21.25 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**.

**Richmond Local Plan 2018 SA 24**

SA 24 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 reprovion 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, reprovion 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.

<b>Richmond Mortlake Development Plan 2011</b>	1.17 The conclusion from the consultation was that the lower density high quality housing schemes with community benefits including a primary school/ community hub, open space (including retention of existing playfields and creation of new open space links), leisure uses such as a museum, craft centre, café and community space and boat house and small-scale employment spaces was the most favoured approach
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### **3. Inadequate Healthcare provision**

#### **Current position**

Currently the Financial Viability Assessment includes a S106 increased payment of £625,055 to the ICB to mitigate the additional demands of the increased population from the STAG site on primary health care. There is an assessment in the Environmental Statement, Chapter 21 – Summary of Mitigation Measures, that the likely residual effect is insignificant.

#### **Planning Assessment**

Within the Sheen, Kew and Barnes Primary Care Network, there are three major residential developments taking place, at Kew Retail Park, STAG and Barnes hospital and one major development in the neighbouring of PCN 'Richmond', the Homebase development. The Health Impact Assessment, March 2022 commissioned by the developer refers to capacity in the existing GP surgeries within 1km of the site, which is incorrect, as the two surgeries are already operating close to the London Healthy Urban Development Unit (HUDU) benchmark of FTE GP: 1,800 patients, before any of the development begins.

The Health Impact Assessment in 2021 recognised the challenges across the borough for adequate healthcare provision. The January 2024 addendum to the infrastructure delivery plan included a map that summarised the relationship between health provision and future planned residential development in the borough, including the key major developments and the location of Primary Care Network (PCN) services. Unfortunately, the map on page 5 understated the size of the developments in the area by 78% or 1,116 homes as shown in the table below. If emergency services, GP and dental services, acute healthcare, integrated care and mental health care and other community and primary care services are based on any of these assumptions then the provision will be significantly below needs, as confirmed by the e-mails below from professionals responsible for the PCN. The previous baseline table in the April 2023 Infrastructure plan was also incorrect.

Retrospectively including space for a GP surgery in a development is very difficult, as confirmed by Nick Grundy below. This is not a surprise, given the Infrastructure Development Plan significantly understates the STAG development and the cumulative development represented by the Site Allocations in the locality by 1,116 homes (see Section A. Context – Cumulative Impact of Extensive Development).

Given the increase in population of around 5,700 people in the locality, it would be prudent to try and include additional GP and other community health provision in the area on at least one of the developments as set out in the Emerging Local Plan. Although the mitigation payment has increased from £495,660 to £625,055 this is to refurbish the existing surgery in Sheen Lane, there are no plans for additional surgery space, even though the current GIA is significantly below recommended levels.

Even if the additional residents from the STAG site alone were accommodated, this equates to an additional 110m<sup>2</sup> to be added onto an existing surgery or around 200m<sup>2</sup> for a new standalone GP Surgery. Dr Grundy has offered to come and provide evidence at the Inquiry as a witness if that would be useful.

## Relevant Policies/Evidence

Policy	Description
<b>National Planning Framework 2021</b>	<p><b>20.</b> Strategic policies should set out an overall strategy for the pattern, scale and design quality of places, and make sufficient provision <sup>13</sup> for:</p> <p>(c) community facilities (such as health, education and cultural infrastructure);</p> <p><b>22.</b> Strategic policies should look ahead over a minimum 15 year period from adoption <sup>15</sup>, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure.</p> <p><b>93.</b> To provide the social, recreational and cultural facilities and services the community needs, planning policies and decisions should (b) take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community;</p>
<b>London Plan 2021</b>	<p>Policy S2 Health and social care facilities</p> <p>A Boroughs should work with Clinical Commissioning Groups (CCGs) and other NHS and community organisations to:</p> <ol style="list-style-type: none"> <li>1) identify and address local health and social care needs within Development Plans, taking account of NHS Forward Planning documents and related commissioning and estate strategies, Joint Strategic Needs Assessments and Health and Wellbeing Strategies</li> <li>2) understand the impact and implications of service transformation plans and new models of care on current and future health infrastructure provision to maximise health and care outcomes</li> <li>3) undertake a needs assessment to inform Development Plans, including an audit of existing health and social care facilities.</li> </ol> <p><b>Needs should be assessed locally and sub-regionally, addressing borough and CCG cross boundary issues</b></p> <ol style="list-style-type: none"> <li>4) <b>identify sites in Development Plans for future provision</b>, particularly in areas with significant growth and/or under provision and to address needs across borough boundaries</li> <li>5) identify opportunities to make better use of existing and proposed new infrastructure through integration, co-location or reconfiguration of services, and facilitate the release of surplus buildings and land for other uses.</li> </ol> <p>B Development proposals that support the provision of high-quality new and enhanced health and social care facilities to meet identified need and new models of care should be supported.</p> <p>C New facilities should be easily accessible by public transport, cycling and walking.</p>
<b>Emerging Local Plan Policy 49 &amp; 51</b>	<p>Policy 51 requires a health Impact statement to be submitted with all major development proposals and policy 49 requires proposals of 10 or more units to assess the potential impact on existing social and community infrastructure.</p>

<p><b>Adopted Local Plan 2018 LP28</b></p>	<p>Impacts on existing social infrastructure E. Development proposals for 10 or more residential units should assess the potential impacts on existing social and community infrastructure in order to demonstrate to the Council that there is sufficient capacity within the existing infrastructure to accommodate the needs arising from the new development</p>																																																							
<p><b>Infrastructure Delivery Plan, Addendum, January 2024, Page 5</b></p>	<p><b>Healthcare -</b></p> <table border="1" data-bbox="526 416 1601 826"> <thead> <tr> <th>Site No.</th> <th>Site Allocation Emerging Plan</th> <th>IDP'24</th> <th>Actual</th> <th>Variance</th> </tr> </thead> <tbody> <tr> <td>35</td> <td>STAG</td> <td>550</td> <td>1075 -</td> <td>525</td> </tr> <tr> <td>29</td> <td>Homebase</td> <td>385</td> <td>453 -</td> <td>68</td> </tr> <tr> <td>32</td> <td>Kew Retail</td> <td>-</td> <td>500 -</td> <td>500</td> </tr> <tr> <td>38</td> <td>Barnes Hospital</td> <td>83</td> <td>106 -</td> <td>23</td> </tr> <tr> <td>32</td> <td>Kew Biothane</td> <td>88</td> <td>88</td> <td>-</td> </tr> <tr> <td></td> <td>Richmond Royal</td> <td>71</td> <td>71</td> <td>-</td> </tr> <tr> <td>30</td> <td>Sainsburys</td> <td>250</td> <td>250</td> <td>-</td> </tr> <tr> <td>36</td> <td>Mortlake Delivery Office</td> <td>-</td> <td>0</td> <td>-</td> </tr> <tr> <td>37</td> <td>Telephone Exchange 172-176 URR</td> <td>-</td> <td>0</td> <td>-</td> </tr> <tr> <td colspan="2"><b>Current Estimate of total homes</b></td> <td><b>1,427</b></td> <td><b>2,543 -</b></td> <td><b>1,116 -78%</b></td> </tr> </tbody> </table> <p>If Social and Community Infrastructure, such as emergency services, GP and dental services, acute healthcare, integrated care and mental health care and other community and primary care services are related to these assumptions then the provision will be significantly below needs, as confirmed by the e-mails below from professionals responsible for this area.</p> <p><a href="http://richmond.gov.uk">Local Plan Infrastructure Delivery Plan - Addendum (richmond.gov.uk)</a></p>	Site No.	Site Allocation Emerging Plan	IDP'24	Actual	Variance	35	STAG	550	1075 -	525	29	Homebase	385	453 -	68	32	Kew Retail	-	500 -	500	38	Barnes Hospital	83	106 -	23	32	Kew Biothane	88	88	-		Richmond Royal	71	71	-	30	Sainsburys	250	250	-	36	Mortlake Delivery Office	-	0	-	37	Telephone Exchange 172-176 URR	-	0	-	<b>Current Estimate of total homes</b>		<b>1,427</b>	<b>2,543 -</b>	<b>1,116 -78%</b>
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<p><b>Infrastructure Delivery Plan, April 2023, Page 22 &amp; 23</b></p>	<p>The Richmond Health and Care Estates Strategy prepared in 2021 identified by each PCN the shortfall in GP premises floorspace as measured against the 60sqm/1000 patients target (sqm) and patient list size. <b>There are very few practices that do not have a shortfall, and across many PCNs the overall shortfall is considerable.</b> Most practices are fully utilising space with two premises identified as overcrowded.</p> <p>Proposed new development will create an <b>increased demand for which in some places could create the need for additional capacity.</b> The capital cost of additional health facilities required to meet the increased demand which arises from new developments can be calculated using the London Healthy Urban Development Unit (HUDU) guidance and Planning Obligations</p>																																																							



	<p>Model. Contributions from CIL/Section 106 towards additional capacity may be required, having regard to the current provision and capacity of services and premises, the <b>cumulative demand for services in the wider area</b> and the service and estate strategies of health bodies.</p> <p>In addition, the Government’s changes may allow flexibility for uses as the introduction of Use Class E (commercial, business and services) included medical and health services, and does in principle allow for changes of use both to and from other Class E uses for some types of social and community infrastructure, provided there are no restrictive conditions on a specific property</p>
<p><b>Health Impact Assessment -2021, evidence for the Emerging Local Plan</b></p>	<p><b>Pressure on Health Infrastructure</b></p> <p>5.7 There is pressure on health facilities in the borough with currently some shortfall in GP floorspace in parts of the borough. Existing health facilities should be protected and the provision of new or improved facilities appropriate to local needs is encouraged. Applications for new or loss of health and social care facilities will be considered in line with the criteria of Policy 49 Social and Community Infrastructure which sets out that written agreement of the relevant health body must be provided to assess the loss of any existing health facilities.</p>
<p><b>E-mail from Nick Grundy on 17-4-23 @16.57</b></p>	<p>‘I tried to clarify who in the ICB has seen this or approved it; I believe it’s gone via Lucy Thatcher in the council planning department and someone called Mary at the ICB.</p> <p>However, the amount proposed looks to me wholly inadequate. The 5,000 patients you reference would requires, per NHSE guidance, about 230m2 of space if it’s possible to add to an additional surgery, or about 420m2 if a standalone GP centre.</p> <p>Current comparables locally are this mixed residential / commercial property of 94m2 in Barnes for £975,000: <a href="https://www.rightmove.co.uk/properties/140269232#/?channel=COM_BUY">https://www.rightmove.co.uk/properties/140269232#/?channel=COM_BUY</a></p> <p>The only rental comparisons available currently on the open market is an 87m2 set of four garages for £33k/year, or the equivalent of a 20-year lease with the funding available, for just over a third of the space needed: <a href="https://www.rightmove.co.uk/properties/143929412#/?channel=COM_LET">https://www.rightmove.co.uk/properties/143929412#/?channel=COM_LET</a></p> <p>Refurbishing the existing building on Sheen Lane is wholly inadequate to support this increased patient demand.</p>

	<p>My role in Richmond is as “primary care development lead”, I’ve been involved in GP premises and estates for a decade, and I oversee the Richmond PCN strategy group. I can confirm that the first time the question of GP space in this development was brought to my attention, or to that of the PCN affected, was via your e-mail.</p> <p>On behalf of all six Richmond PCNs and the associated GP surgeries, I oppose the development with the currently-proposed mitigation payment. It is completely inadequate for a development of this size, and if the development proceeds without a clear, funded plan to increase physical space in primary care, access to medical care will be severely adversely affected in the area.</p> <p>The amount proposed would rent four garages for 20 years. It’s nowhere near adequate.</p> <p>I’d be very happy to be involved in constructive discussions about either identifying a site for development, or how existing sites could be expanded to cope with the increased healthcare demand.</p> <p>Dr. Nicholas Grundy          GP partner &amp; trainer, <a href="#">Park Road Surgery</a>   <a href="#">Richmond borough</a> primary care place development lead          Park Road surgery, 37 Park Road, Teddington TW11 0AU   Tel 020 8977 5481   email <a href="mailto:nicholasgrundy@nhs.net">nicholasgrundy@nhs.net</a></p>
<p><b>Email from Dr Eleanor Squire on 5-6-23 @13:08, Primary Care Network lead for Mortlake, Barnes, East Sheen and Kew.</b></p>	<p>‘GP services are under the same pressures up and down the country so I don't think Sheen and Barnes PCN is any different from anywhere else. There are two primary issues when considering an influx of patients to an area: 1. estates 2. recruitment. As you are no doubt aware, GP estates across Richmond Borough are woefully inadequate - we are working to the physical capacity of our buildings the whole time and simply do not have the physical space for more staff. It will be essential to consider this alongside any planning applications locally. Additionally, although Richmond is a generally appealing place to work, affordable housing is a huge problem for our staff, which makes retaining both doctors and nurses very difficult. Including affordable housing, available to NHS workers, would be a really positive step for future developments.’</p>
<p><b>E-mail from Nicholas Grundy 11-6-22 @11:58, NHS</b></p>	<ul style="list-style-type: none"> <li>• The recommended space GP surgeries should have per NHS England guidance             <ul style="list-style-type: none"> <li>○ this is based on the number of patients they look after (list size)</li> <li>○ it predates the significant expansion in staffing we’ve had in the last three years, so is an underestimate in my view</li> </ul> </li> <li>• The actual space they have</li> <li>• The percentage over and under they are</li> </ul>

	<b>Sum of should have GIA</b>	<b>Sum of actual GIA</b>	% under
<b>PCN</b>			
East Twickenham	2680	1609	-40.0%
Hampton	2502	945	-62.2%
Richmond	3492	2224	-36.3%
Sheen & Barnes	4011	2076	-48.2%
Teddington	2878	2059	-28.5%
West Twickenham	3076	2182	-29.1%
<b>Grand Total</b>	<b>18639.9138</b>	<b>11095.1</b>	-40.5%
<p>I have also included this for the practices within Sheen &amp; Barnes PCN. Some of the data will be a few years out of date, and it doesn't include Richmond Medical Group's satellite practice at Kew yet, but we plan to update that this year. As you'll see, pretty much everywhere is significantly under-sized.</p> <p>In terms of this specific application, it is manifestly not the case that there's spare physical capacity in Sheen &amp; Barnes, and it is completely dishonest to suggest that open lists indicate spare capacity. The PCN as a whole only has about half the physical space it should do, and it's short almost 2000m2 – however, we should revise those figures with the new site included.'</p>			
<b>LBRuT Mortlake Development Plan 2011</b>	5.2 The Council also recognises that the development will increase the pressure on local health services and appropriate planning contributions will be sought to increase local capacity.		

#### 4. Inadequate Transport infrastructure

##### Current Position

The Transport for London (TfL) online Public Transport Accessibility Level (PTAL) calculation tool<sup>1</sup> has been used to calculate the PTAL of the Site. The Site at present has a PTAL rating of predominantly 2 with a PTAL rating of 1 at the western corner of the Site, which represents a 'poor' and 'very poor' level of accessibility to public transport services, respectively. Hammersmith Bridge is currently closed to traffic, which has had a negative impact on the operation of Chalker's Corner at peak times, with Transport for London (TfL) stating that Chiswick Bridge is experiencing a significant increase in vehicular traffic due to the reduction in the number of crossing points for vehicles over the river Thames. There is currently no date set for the reopening of Hammersmith Bridge, the longer it remains closed, the less likely it is to reopen.

As set out in Section [ ], the cumulative development from Site Allocations in the Emerging Local Plan will result in around 2,500 new homes and 5,700 new residents, a new 1,200 secondary school, 90 pupil SEMH school and new adult mental health facility all within 1.2 miles of the STAG site.

##### Planning Assessment

The original 2011 brief include the need to address congestion and transport problems in the area. The Urban design study in 2023 that informed the Emerging Plan, highlighted the impact of the increased density of residents on existing social infrastructure and transport network and the need to assess what changes might be required. It also referred to consultations in East Sheen, Kew, Barnes and Mortlake areas surrounding the site, where residents identified a reduction in traffic and improvement in public transport as an area of most importance in future.

The site area has an existing rating of poor or very poor accessibility to public transport. A comprehensive consultation with TfL identified that the operation of the junction with the A316 (Clifford Avenue) and Lower Richmond Road at the Chalker's Corner junction and in particular, congestion and delay on Lower Richmond Road was a key design consideration and an increase in capacity at Chalker's Corner was necessary to facilitate the development. The proposals include a Chalker's Corner 'Light' Scheme, with a new left-hand lane westbound on Lower Richmond Road, resulting in the loss of 6 car parking spaces (see Appendix 2 below).

Prior to development the site PTAL rating of 2 and 1 would indicate that significant mitigation is required to improve transport infrastructure before development begins. The data contained within Environmental Statement, Chapter 8 relating to Transport was taken in 2016/2017 and has not been updated and para 8.33 of Chapter 8, state that 'the impact of Hammersmith Bridge closure has been excluded from this assessment'. As the closure of Hammersmith Bridge in 2019 has significantly increased traffic in this area, no meaningful conclusions can be drawn from the data and the tests should be repeated. The following conclusions in chapter 8 are illogical given the PTAL rating, consultation conclusions, increase in traffic problems following Hammersmith Bridge closure, scale of the development and the congestion that is already on the main roads around the site:

- In para 8.173 that during 7 years of construction no mitigation is required. A feasibility study of the use of the river for transporting goods during construction is supported by the Port of London Authority and should be undertaken. Significant mitigation is needed to remove residual likely effects.
- That the Chalker's 'light' proposals will mitigate traffic issues after completion. Significant mitigation is required for traffic, protection for cyclists and pedestrians to remove residual

likely effects. Works set out in para 9.3.2 of the Environmental Statement, described below are minimal and involve adjusting stop lines, and are costed at £3,019,000. Whilst these costs have been reviewed by Johnson Associates, it is difficult to understand how they are justified. Increasing the capacity of the local roads is also contrary to the direction of the Emerging Local Plan, particularly when no improvements are suggested to enhance the experience of and protect pedestrians and cyclists.

In July 2023, 1,400 residents signed a petition which was presented at Richmond Council and to the GLA calling on them to update the transport strategy for the area given the terrible congestion and reducing public transport.

A Transport *Statement* was commissioned in January 2024 to accompany the Emerging Local Plan. It looked at the cumulative development and assumed a new but unproven forecasting technique. This did not amount to a fresh transport strategy, as sought in the petition, that residents believe is required to ascertain what infrastructure changes are required to address local transport issues. The current Chalker's Light scheme is not sufficient mitigation for the additional 2,398 residents and 1,200 pupils using the site.

## Relevant Policies/Evidence

Policy	Description
<p><b>National Planning Policy (NPPF) Framework 2021 – Plan making and delivery</b></p>	<p><b>Strategic policies</b></p> <p><b>20.</b> Strategic policies should .. make sufficient provision for.. b) infrastructure for transport ...</p> <p><b>22.</b> Strategic policies should look ahead over a minimum <b>15-year period</b> from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure. <b>Where larger scale</b> developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery.</p> <p><b>Preparing and reviewing plans</b></p> <p><b>31.</b> The preparation and review of all policies should be underpinned by relevant and <b>up-to-date evidence</b>.</p> <p><b>33.</b> Policies in local plans ..should be <b>updated at least once every five years</b> ..and should take into account changing circumstances affecting the area, or any relevant changes in national policy.</p>
<p><b>National Planning Framework 2021</b></p>	<p><b>104.</b> Transport issues should be considered from the earliest stages of plan-making and development proposals, so that:</p> <p>(a) the potential impacts of development on transport networks can be addressed;</p> <p>(b) opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised – for example in relation to the scale, location or density of development that can be accommodated;</p> <p>(c) opportunities to promote walking, cycling and public transport use are identified and pursued;</p> <p>(d) the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains; and</p> <p>(e) patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places.</p> <p>106 (c) identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice and realise opportunities for large scale development;</p>
<p><b>London Policy D2 Infrastructure requirements</b></p>	<p><b>Infrastructure requirements for sustainable densities</b></p> <p>A. Where there is currently insufficient capacity of existing infrastructure to support proposed densities (<b>including the impact of cumulative development</b>), boroughs should work with applicants and infrastructure providers to ensure that sufficient capacity will exist at the appropriate time. This may mean that if the development is contingent on the provision of new infrastructure, including public transport services, it will be appropriate that the development is phased accordingly.</p>

	<p>B. When a proposed development is acceptable in terms of use, scale and massing, ... but it exceeds the capacity identified in a site allocation or the site is not allocated, and the borough considers the planned infrastructure capacity will be exceeded, <b>additional infrastructure proportionate to the development should be delivered through the development.</b> This will be identified through an infrastructure assessment during the planning application process, <b>which will have regard to the local infrastructure delivery plan</b> or programme, and the CIL contribution that the development will make. Where additional required infrastructure cannot be delivered, the scale of the development should be reconsidered to reflect the capacity of current or future planned supporting infrastructure.</p>
<b>London Policy SD2 Collaboration in the Wider South East</b>	<p>Mayor will work with partners to plan the necessary infrastructure to support 'good growth'. LAs have a duty to co-operate with other LAs to help plan any infrastructure changes required.</p>
<b>London Plan 2021 T4 Assessing and mitigating transport impacts</b>	<p>C Where appropriate, mitigation, either through direct provision of public transport, walking and cycling facilities and highways improvements or through financial contributions, will be required to address adverse transport impacts that are identified.</p> <p>D Where the ability to absorb increased travel demand through active travel modes has been exhausted, existing public transport capacity is insufficient to allow for the travel generated by proposed developments, and no firm plans and funding exist for an increase in capacity to cater for the increased demand, planning permission will be contingent on the provision of necessary public transport and active travel infrastructure.</p> <p>E The <b>cumulative impacts of development</b> on public transport and the road network capacity including walking and cycling, as well as associated effects on public health, should be taken into account and mitigated.</p> <p>F. Development proposals <b>should not increase road danger</b></p> <p>10.4.3 It is important that development proposals reduce the negative impact of development on the transport network and reduce potentially harmful public health impacts. The biggest transport-related impact of development on public health in London is the extent to which it enables physical activity from walking, cycling and using public transport. The other main impacts on public health relate to air quality, road danger, noise, and severance.</p>
<b>Urban Design Study 2023</b>	<p>Page 210 – the Impact of <b>the increased density</b> on existing social infrastructure and <b>transport network</b> needs to be assessed ..</p> <p>Page 235 – the consultations in East Sheen, Kew, Barnes and Mortlake identified <b>a reduction in traffic and improvement in public transport as a current key area of concern and an area of most importance in future.</b></p>
<b>Infrastructure Delivery Plan Addendum January 2024</b>	<p>During the Regulation 19 consultation, the Council received some comments regarding infrastructure and the IDP, which have since been considered alongside the Local Plan and the wider evidence base. In terms of transport issues, the 2023 IDP included in 'section 3.5 Transport infrastructure', updates that included drawing upon information set out in the Council's Local Implementation Plan 3 (LIP3), further consideration taken regarding the borough's context and consideration of further detail</p>

	<p>provided on the Council’s short to medium term transport priorities. The Council have also produced a <b>Transport Background Topic Paper</b> to support Local Plan policies since the Regulation 19 consultation was conducted, which points to the changing travel patterns within the borough, especially the 14% decline in car and motorcycle trips since a peak in 2003 and that traffic levels are unlikely to reach this peak within the Local Plan period despite household and population growth in the borough. The paper responds to comments from National Highways and other Duty to Cooperate bodies to set out that the cumulative impact of development proposed in the Plan is unlikely to have a material, strategic impact on the public transport system or highway network, but development may require transport improvements as part of appropriate site-specific mitigation to address local impacts</p>
<p><b>Background Paper – Transport Statement to accompany the Emerging Local Plan</b></p>	<p>Updated transport statement, this does not amount to a new transport strategy.</p>
<p><b>LIP 3</b> (consultation from Nov 2018 to April 2019)</p>	<p>Outcome 5: The public transport network will meet the needs of a growing London – states that Richmond will work in partnership with TFL, Network Rail and SW Rail to improve public transport across the borough ..</p> <p>Outcome 8: Active, efficient and sustainable travel will be the best option for new developments in areas with high levels of public transport accessibility (PTALs) e.g. Richmond and Twickenham centres. Reference to the fact that there are no Mayor designated Opportunity Areas for growth within the Richmond.</p> <p>Page 27 – reference to the correlation between areas with low active travel levels and low PTALs. Targeting these areas will be a priority for infrastructure improvements .. [for] walking ..cycling ..bus stops and ..rail stations ..</p> <p>Long term interventions to 2041 - no mention of the four developments around Chalker’s Corner, or their cumulative impact.</p>
<p><b>Richmond Emerging Plan – Policy 47. Sustainable travel choices (Strategic Policy)</b></p>	<p>A. The Council will work with others to bring about safe, sustainable, accessible transport solutions .... in accordance with the policies set out in the London Plan, Mayor’s Transport Strategy, and the Council’s own Active Travel Strategy.</p> <p>B. Propose major developments (see Table 23.1 for a definition) in areas that either already have a Public Transport Accessibility Level of 4-6 or if not mitigate the impact..</p> <p><b>Assessing the impact of developments</b></p> <p>E. Demonstrate that their proposed developments do not a have a severe impact on the operation, safety, or accessibility of the local or strategic road network. Any impact on the local or strategic road network, including the impact of occupants parking vehicles on the carriageway, will need to be mitigated in accordance with para. 110d of the NPPF. F. All planning applications for</p>



	<p>major developments will need to include a full transport assessment and travel plan which must be completed in accordance with Transport for London (TfL) guidance ..</p> <p><b>River transport</b></p> <p>23.20 The Council encourages the use of the River Thames for passenger and freight transport through the protection of, and improvement to, the relevant infrastructure including wharves and slipways.</p>
<p><b>Carter Jonas Report Jan 2024 Build Costs 5.2.1</b></p>	<p><b>Chalker’s Corner - £3,019,000 for the works set out in Appendix 2</b></p>
<p><b>Transport Assessment Environmental Statement 9.3 Proposed option Chalker’s Corner ‘Light’, page 101</b></p>	<p>9.3.2 The proposed design is shown in Appendix 2. The key features of the design include the following:</p> <ul style="list-style-type: none"> <li>• Provision for a left turn flare lane from Lower Richmond Road.</li> <li>• Relocation of stop lines on A205 closer to the junction.</li> <li>• Introduction of advanced stop lanes on Mortlake Road and Clifford Avenue South.</li> <li>• Widening of area between junctions by relocating stop line by 2m.</li> <li>• Removal of one tree and replacing with two trees.</li> </ul>
<p><b>Richmond Local Plan 2018 LP 44</b></p>	<p>B. Walking and cycling Ensure that new development is designed to maximise permeability within and to the immediate vicinity of the development site through the provision of safe and convenient walking and cycling routes, and to provide opportunities for walking and cycling, including through the provision of links and enhancements to existing networks</p> <p>C. Public transport Ensure that major new developments maximise opportunities to provide safe and convenient access to public transport services. Proposals will be expected to support improvements to existing services and infrastructure where no capacity currently exists or is planned to be provided. Protect existing public transport interchange facilities unless suitable alternative facilities can be provided which ensure the maintenance of the existing public transport operations. Applications will need to include details setting out how such re-provision will be secured and provided in a timely manner</p> <p>D. The road network Ensure that new development does not have a severe impact on the operation, safety or accessibility to the local or strategic highway networks. Any impacts on the local or strategic highway networks, arising from the development itself or the cumulative effects of development, including in relation to on-street parking, should be mitigated through the provision of, or contributions towards, necessary and relevant transport improvements. In assessing planning applications the cumulative impacts of development on the transport network will be taken into account. Planning applications will need to be supported by the provision of a Transport Assessment if it is a major development, and a Transport Statement if it is a minor development</p>

<b>LBRuT Mortlake Development Plan 2011</b>	5.35 A Transport Assessment will be necessary to consider the impact of vehicular traffic within and around the site as a whole. Development proposals will need to take into account impact on traffic congestion and air quality, impact on the historic environment and impact on local residents. Appropriate improvements to highways and public transport provision will need to be identified
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## 5. Lack of Affordable Housing

### Current Position

The STAG site will deliver **52 Social rent homes, 13 Intermediate homes and 1,010 Market homes**, which equates to 6% of habitable rooms, 5% of units. In line with the policies below, all developments over 10 units are required to provide Affordable Housing. Where the percentage is less than 50%, the Developer is required to submit a viability assessment to confirm the maximum level of affordable housing that a scheme can deliver. For the purposes of testing the viability of the proposals, BNP the developer's advisor, has provided scenarios to show that, despite making a profit of £122m on the site, no affordable housing is viable. However, as a goodwill measure, the developer has offered the housing above – 65 Affordable homes out of a total of 1,075.

Carter Jonas' who is advising Richmond Council on viability stated in their final report, Executive Summary, page 4:

*'It is essential that all assumptions are carefully scrutinised by the local planning Authority to ensure that they reflect current market condition and have not been unreasonably depressed in respect of value or overestimated in respect of development costs'*

Page 6 *'having reviewed the residential evidence .. we consider private values adopted .. to be overly conservative.*

Page 8, *'given the characteristics and location of the site we do believe there is a good prospect for value growth within the proposals and as such we have modelled a stepped change of plus 5% in private residential sales ... we recommend .. appropriate Review Mechanisms given the long-term phased nature of the scheme ..'*

CDL purchased the site in 2015 for £158m. The benchmark land value, which includes the cost of compliance with the policy to provide Affordable Housing, was agreed for the purposes of viability testing at £36m. This essentially leaves a £122m 'overpayment' by the developer for the land. As set out in Planning Policy guidance – overpayment is no justification for non-compliance of the affordable housing obligations. Compliance should have been considered when the purchase price was agreed.

CIL obligations impact viability. The scenarios presented by BNP included two CIL options, one of £49m, the other of £63m. The lower CIL estimate assumed that all existing space on the STAG site met the CIL occupancy test. This test was satisfied on 13<sup>th</sup> March 2024, as the Planning Committee consented to the Film production company having 'permanent' not temporary rights for film production operations and ancillary activities. This reduced the developer's costs by £14m in CIL payments, which should allow an increase in the Affordable Housing contribution. In this case, as both CIL scenarios, estimated 'nil' affordable housing, this is likely to have helped secure the low offer that was made.

### Planning Assessment

This level of affordable housing is considerably lower than other commercial schemes in the area (e.g. Homebase), which is currently forecast to deliver 23% Affordable rent, 15% Intermediate and 62% Market Housing.

The modelled blended market price per sq. ft at STAG for private residential properties has fallen from £987 estimated by Savills in the December 2019, to £957 estimated by Strutt & Parker in April 2023, a fall of 3% over the last 4.5 years, and a corresponding fall of 19% in the blended Affordable

price from £327 to £266. The decline in sales values seems to be the key driver for a significant decline in viability since 2018, from around 30% to 6% of affordable units.

The Carter Jonas FVA Jan'24 stated they disagreed with the sale values and thought they were overly conservative. They also recommended higher growth rates of 5% (Page 8) than those used by BNP of 2-3% from 2024-27 and 4% from 2028 onwards (8.37 January '24 Officer's report, para 8.37).

In March 2023, the Carter Jonas draft report available for the July'23 Planning Committee meeting had concluded that 101 affordable homes, assuming full CIL relief on existing floor space, was reasonable. However, the actual offer put to the July '23 planning committee reduced the number of affordable homes from 101 to 65 (52 social rent and 13 intermediate), The BNP'23 report, Appendix 2 in May 2023 report available for the July Planning Committee showed the developers estimated IRR of 17.73%, on 65 affordable homes, above Richmond's 17.1% blended threshold.

The BNP FVA reports refer to challenging market conditions as justification for the decline in sales values, but this does not reflect the cyclical nature of residential sales and the sales growth rates likely to be achieved over the course of the development. The inclusion of a 'review mechanism' to mitigate against overly conservative viability assumptions places the council in a vulnerable position because Richmond council is not in control of the project during the 10-year phased construction period. No modelling was included to show Members the impact of a growth in sales values above those forecast which meant the headroom available to the developer could not be assessed. A Review Mechanism also inevitably means that any additional income generated for affordable homes would be spent off-site, depriving many local residents of the opportunity to live in the local area.

Modelled scenarios to assess the impact of the following options were also not produced, leaving members with no information to challenge the developer's low contribution rates:

#### ***Additional Funding Sources***

The use of alternative funding streams to increase the offer of affordable housing on the site, or nearby as part of a housing estate regeneration (similar to Ham Close) were not considered, despite community requests to consider this option. Given up to £10m Neighbourhood CIL was available, together with £22m of Richmond unallocated affordable housing funds, this lost opportunity to develop more affordable housing and/or retrofit and improve existing stock is deeply regretted by the local community.

#### ***Secondary School***

A key trade-off for affordable housing is the land which is provided for the new secondary school by the developer. If this land were available for housing either in whole, or part, more affordable housing could be provided. An estimate of 57 affordable homes was included if the OOLTi field was retained in full and additional housing placed around it in the July 2023 Officer's report (Para 8.122). The developer was willing to negotiate and offered to fund various alternative school options which were preferred by the local community and were in line with the original planning brief. However, the Council would not engage in any discussions.

#### ***Basement carparking***

There are currently 489 car parking spaces on site, the cost of which exceeds receipts which negatively impacts viability. The car parking ratio is 0.375. (Table 20, January'24 Officers Report). A smaller basement with a lower car parking ratio should be modelled, together with any resultant reduction in sales values, to understand the impact on viability. A car-free development would be

preferable, with any surplus funds invested in improved public transport, car club and bike hire schemes.

***Cinema***

If the cinema currently has a negative impact on viability, a scenario should be modelled to switch the cinema to non-commercial community facilities, accepting that this will also have some impact on viability. This would have the benefit of enhancing 'place-making'. (8.120 – July'23 report)

***S106 costs***

As there is a proposal for the DFE to meet a substantial amount of the S106 costs, the impact of these savings on viability should be determined. (8.41, January Officers report)

***Alternate structures***

If sales values are not optimal, the developer could rent the flats instead, and wait until sales prices recover. The rental market is currently very strong due to a shortage of supply and therefore this alternate approach could help maximise viability.

In summary, much was made in the BNP November 2023 report of the current depressed housing market. In the planning meeting in July '23 and January '24, members narrative was focussed on the need to get on with something, and anxiety that any delay would further worsen the affordable housing offer. Members were not willing to consider other options. Despite Carter Jonas reservations in their final report the Developer's assumptions were not properly challenged in the Planning Committee meeting. In particular, scenarios were not produced to show what the viability would be if sales values grew beyond those forecast, what the impact of the review mechanism would be, given so much reliance was being placed on it, and which alternate options maximised viability.

Had this modelling been available, this would have provided Members in planning committee with information they needed to challenge the developer's low offer. Without this, they felt compelled to accept the low recommendations and rely on the Review Mechanism to provide some protection. Even though this meant that any additional affordable housing was likely to be off-site, the contribution would be uncertain as Richmond has no operational control over the project, and they had no idea what the impact of this mechanism would be.

Relevant Polices/Evidence

Policy/Evidence	Description
<p><b>National Planning Policy – viability</b></p> <p><a href="http://www.gov.uk">Viability - GOV.UK (www.gov.uk)</a></p>	<p><b>How should land value be defined for the purpose of viability assessment?</b></p> <p>To define land value for any viability assessment, a benchmark land value should be established on the basis of the <a href="#">existing use value (EUV)</a> of the land, plus a premium for the landowner. The premium for the landowner should reflect the minimum return at which it is considered a reasonable landowner would be willing to sell their land. <b>The premium should provide a reasonable incentive, in comparison with other options available, for the landowner to sell land for development while allowing a sufficient contribution to fully comply with policy requirements. Landowners and site purchasers should consider policy requirements when agreeing land transactions. This approach is often called ‘existing use value plus’ (EUV+)</b></p> <p><b>What factors should be considered to establish benchmark land value?</b></p> <p>.. Where viability assessment is used to inform decision making <b>under no circumstances will the price paid for land be a relevant justification for failing to accord with relevant policies in the plan.</b></p> <p>When CDL purchased the land, they should have included in the calculation of the purchase price the obligation to comply with policy and provide Affordable housing on the site. ‘Overpaying’ for the site is no justification to reduce the level of Affordable Housing.</p>
<p><b>Planning Committee – 13 March 2024</b></p>	<p>Permission was sought to allow filming on the STAG site on a ‘permanent’ basis. This was approved and resulted in Reselton to fulfil the eligibility criteria for the occupancy test which would allow them to pay the reduced CIL fee of £49m, rather than the higher fee of £63m, a £14m saving.</p>
<p><b>Richmond Council’s Advisor - Carter Jonas Report dated January 2024</b></p>	<p>Uploaded to the Planning Portal on 25 January 2024, with the planning meeting held on 31-1-24.</p> <p>Cater Jonas’ Final report, Executive Summary, page 4 stated:  <i>‘It is essential that all assumptions are carefully scrutinised by the local planning Authority to ensure that they reflect current market condition and have not been unreasonably depressed in respect of value or overestimated in respect of development costs’</i></p>

	<p>Page 6 <i>'having reviewed the residential evidence .. we consider private values adopted .. to be overly conservative.</i></p> <p>Page 8, <i>'given the characteristics and location of the site we do believe there is a good prospect for value growth within the proposals and as such we have modelled a stepped change of plus 5% in private residential sales ... we recommend .. appropriate Review Mechanisms given the long-term phased nature of the scheme ..'</i></p>
<b>Developer's Advisor, BNP Paribas - Report dated Jan'24</b>	Uploaded on 11 January. This reconciled the assumptions in the emerging plan viability assessment (which BNP had advised Richmond Council on) and the STAG FVA report (which BNP had advised Reselton on).
<b>Developer's Advisor, BNP Paribas - Report dated Nov 2023</b>	<p>Uploaded on 5 December 2023, Main report which included the final FVA.</p> <p>Appendix 6: lower CIL costs with growth and inflation, and 80/20 split social rent/intermediate is the most likely estimate. This generates a profit of £122m and an IRR of 14.8%</p>
<b>The Community Infrastructure Levy (Amendment) Regulations 2013, Application of CIL by local councils</b>	<p><b>59C.</b> A local council must use CIL receipts passed to it in accordance with regulation 59A or 59B to support the development of the local council's area, or any part of that area, by funding—</p> <p>(a) the provision, improvement, replacement, operation or maintenance of infrastructure; or</p> <p>(b) anything else that is concerned with addressing the demands that development places on an area.</p> <p>[[b) can include affordable housing in the area]</p>
<b>Officers Report – July '23</b> <b>Opportunities to enhance viability: 8.115-8.123</b>	<p><b>Opportunities to enhance viability, 8.115-8.123 including:</b></p> <p>8.122 A paper was prepared by the applicant to explore how the affordable housing would differ if the school was not proposed and instead replaced with housing and the existing playing fields retained. <b>This results in an additional 57 affordable housing (with full CIL offset).</b> ..</p>
<b>Developer's Advisor, BNP Paribas - Report dated May 2023</b>	<p>The report updated prior to the July 2023 planning committee meeting which approved Application A and B.</p> <p>Appendix 2: lower CIL costs with growth and inflation, and 80/20 split social rent/intermediate is the most likely estimate. This generates a profit of £159.5m and an IRR of 17.7%</p>
<b>Richmond Council's Advisor - Carter Jonas</b>	This report was not complete when the planning committee was held on 19 July 2023, it was uploaded onto the planning portal on the day of the meeting. Members were unaware that the council's independent advisor report was incomplete. The officers

<p><b>draft report dated March 2023</b></p>	<p>report did not refer to the offer of 101 affordable homes which was recommended in this report and was significantly higher than 65 homes presented to the committee.</p>
<p><b>London Plan 2021 H4 – Delivering Affordable Housing H5 – Viability requirements</b></p>	<p>4.4.3 Schemes that do not meet the [35%] threshold .... will be required to submit detailed viability information which will be scrutinised and treated transparently. Comprehensive review mechanisms will be applied .... in order to ensure that affordable housing contributions are increased if viability improves over time.</p> <p>4.4.4 Schemes are expected to deliver at least the threshold level of affordable housing without grant or public subsidy and to increase this proportion through the use of grant and other subsidy, where available. Only where there are clear barriers to delivery and it is fully justified through detailed viability evidence, in line with the methodology and assumptions set out in Policy H5 Threshold approach to applications and the Mayor’s Affordable Housing and Viability SPG, should a lower level of affordable housing be considered.</p> <p>4.5.2 The Viability Tested Route will assess the maximum level of affordable housing that a scheme can deliver in cases where the threshold level of affordable housing cannot be met and where fixed or minimum affordable housing requirements are not in place. It is possible that, via the viability assessment using the detailed methodology in the SPG, a greater affordable housing contribution than the threshold level will be found to be viable and thus will be required.</p>
<p><b>Richmond Housing &amp; Homeless Strategy 2021 -2026 (page 11)</b></p>	<p>We will:</p> <ul style="list-style-type: none"> <li>• Work proactively with PRPs, private developers .. and the GLA to increase the delivery of affordable homes including building a pipeline of 1,000 affordable homes to be delivered over the next 10 years.</li> <li>• Make <b>best use of financial assets and resources</b>, both Council, housing association and charitable sector, to deliver more affordable housing. This will include on Council owned sites seeking a minimum of 50% affordable homes and aiming to achieve significantly higher than this where possible..</li> <li>• Through the Council’s housing and planning policies support PRP development to deliver 100% affordable housing schemes</li> </ul>
<p><b>Richmond Emerging Local Plan Policy 10 – Target number of homes</b></p>	<p>17.10 – the London 2021 2021 set a ten-year target of 4,110 homes.</p> <p>Currently Policy 10 shows 800-900 estimated for ‘Barnes and East Sheen’ which includes Mortlake &amp; Barnes Common Ward. Neighbouring ‘Richmond’, which includes Kew is forecast to provide 1,100-1,200 homes, a total of between 1,900-2,100 homes.</p> <p>This is understated by around 500 homes. Together the developments in these wards will provide cumulatively around 2,500 new homes, and 6,000 new residents, over 50% of the borough target. Before development begins Mortlake and Barnes Common is already the largest by population and second most densely populated ward in the borough.</p>



<p><b>Richmond Emerging Local Plan Policy 11 – Affordable Homes</b></p>	<p>C. All new housing developments in the borough should provide at least 50 per cent of the total number of habitable rooms as affordable housing on site...</p> <p>E. If the minimum level of affordable housing is not provided in line with Part B (1) and B(2) the application for development will be refused.</p> <p>F. <b>Site-specific viability information will only be accepted in exceptional cases</b>, determined by the Council. Any proposals where site-specific viability evidence is accepted must provide the maximum amount of affordable housing, informed by detailed viability evidence.</p> <p>17.25 The Council has rigorously tested their affordable housing targets to make sure that they are viable through what is called a Whole Plan Viability Study. It is confirmed that the policy compliant level of affordable housing required on sites is viable so the Council will not accept anything less. Applications submitted that provide less affordable housing than set out in policy will be rejected. <b>The Council will in extraordinary circumstances and on a case by case basis accept viability arguments if it can be demonstrated that the site has abnormal costs that could not be foreseen, for example infrastructure provision that could not have been foreseen at The Whole Plan Viability stage and need to be considered on a site-specific basis taking into account variations between private sales values, scheme composition and benchmark land value.</b> The Council will only accept viability arguments once it has been confirmed that the applicant has explored with the relevant Council officers the availability and application of grant to increase or provided a better tenure of affordable housing.</p> <p>17.27 As evidenced by the LHNA the Council has a substantial need for affordable housing. As small sites which are not in employment use (less than 10 units and/or 1000sqm) aren't required to provide on-site affordable housing, this requires schemes above the threshold to deliver 50% to help achieve our target. Therefore, payments in lieu will be strongly resisted where the policy requirement is for on-site provision. The Council only has a finite number of deliverable sites due to the various constraints in the borough. Offsite delivery or a payment in lieu would mean an opportunity to deliver actual affordable housing would be missed. <b>If in the extraordinary circumstance that off-site provision is acceptable, then the Council will expect that the affordable housing is maximised on both sites. The Council will only accept this arrangement if the total number of affordable habitable rooms over both sites equal 50% of the total number of habitable rooms.'</b></p> <p>This replaced previous section 9.3.11 and 9.3.12 in the 2018 Adopted plan, and helpfully includes the key elements which the STAG developer has taken into account in their viability assessment - mainly 'infrastructure provision [the school] .. , private sales values, scheme composition and benchmark land values' .</p>
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## 5.2 Bedroom Mix of Affordable Housing

The current plan assumes that two buildings will provide the Affordable Housing units set out in the table below.

The latest Strategic Housing Market Assessment was completed in 2021 and updated in 2023. In line with the recommendations, the development mix of affordable homes is focused on larger family homes, which is welcome. Supported and/or extra care housing is also a priority. In the original plan in 2018, the development included 150 assisted living flats. If additional affordable homes are secured, it would be beneficial if some of them could be attributed to this category given they remain a priority need.

### STAG - bedroom mix

No. of units	Studios	1-bed	2-bed	3-bed	4-bed	Total	
Private	27	271	472	217	23	1010	94%
Intermediate		8	5			13	1%
Affordable Rent			3	44	5	52	5%
<b>Total</b>	<b>27</b>	<b>279</b>	<b>480</b>	<b>261</b>	<b>28</b>	<b>1075</b>	<b>100%</b>

## Relevant Policies/Evidence

Policy	Description
<b>National Planning Framework 2021 -</b>	62. ... the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies.
<b>London Plan 2021 H10 – Housing Mix D6 – Minimum Design Standards</b>	<p>4.5.3 The percentage of affordable housing on a scheme should be measured in habitable rooms to ensure that a range of sizes of affordable homes can be delivered, including family-sized homes. Habitable rooms in affordable and market elements of the scheme should be of comparable size when averaged across the whole development. If this is not the case, it may be more appropriate to measure the provision of affordable housing using habitable floorspace. Applicants should present affordable housing figures as a percentage of total residential provision in habitable rooms, units and floorspace to enable comparison.</p> <p>D6 – Table 3.1 – minimum design standards for 1B2P = 50 sq'ms, 2B4P = 70 sqm's</p> <p>H10 – Housing Size Mix A Schemes should generally consist of a range of unit sizes. To determine the appropriate mix of unit sizes in relation to the number of bedrooms for a scheme, applicants and decision-makers should have regard to: 1) robust local evidence of need where available or, where this is not available, the range of housing need and demand identified by the 2017 London Strategic Housing Market Assessment</p> <p>4.10.4 One-bedroom units play a very important role in meeting housing need, and provision in new developments can help reduce the pressure to convert and subdivide existing larger homes. However, one-person and one-bed units are the least flexible unit type so schemes should generally consist of a range of unit sizes.</p>
<b>Richmond Emerging Local Plan – Policy 13</b>	The Housing Mix and Standards policy 13 recognises some older people will seek to downsize to smaller homes. There is flexibility on the requirement for family units for retirement, sheltered or extra care housing.
<b>Richmond Adopted Local Plan</b>	<p>3.1.29 Affordable housing is a priority in the borough .. Therefore, the Council will pursue all opportunities to maximise affordable housing through a range of measures, including providing more choice in the different types of affordable housing with the aim to provide for different levels of affordability.</p> <p>3.1.31 The Local Plan ensures that developments will provide for a choice in housing types and sizes. Generally, the Spatial Strategy is to seek family sized accommodation in the borough, particularly within the residential areas; in the borough's centres, a higher proportion of small units would be appropriate. Opportunities for younger people to get on the housing ladder and downsizing for older people to smaller units were identified in consultations with local communities. Therefore, the Local Plan</p>

	<p>will ensure that developments provide an appropriate housing mix that reflects local needs, and which is appropriate to the location in which the development is proposed</p>																				
<p><b>Richmond Housing &amp; Homeless Strategy 2021 -2026 (page 11)</b></p>	<p>We will:</p> <ul style="list-style-type: none"> <li>• Deliver a range of affordable homes that meet the needs of local residents and workers. This will include developing housing offers for local key workers, improved supported housing ..</li> </ul>																				
<p><b>Mortlake Development Plan 5.22</b></p>	<p>The Council will therefore support a mixed tenure residential led mixed use development provided there is a range of other uses to create a vibrant Riverside area and associated employment and leisure opportunities. This should include family housing and the maximum reasonable provision of affordable housing of appropriate tenure mix,</p>																				
<p><b>Richmond Local Housing Market Assessment – report 2021 by Icen Projects</b></p>	<p><b>Table 4.1 Suggested Housing Mix by Size – LB Richmond-upon-Thames</b></p> <table border="1" data-bbox="555 651 1727 823"> <thead> <tr> <th></th> <th>1-bedroom</th> <th>2-bedrooms</th> <th>3-bedrooms</th> <th>4+-bedrooms</th> </tr> </thead> <tbody> <tr> <td>Market</td> <td>11%</td> <td>34%</td> <td>45%</td> <td>11%</td> </tr> <tr> <td>Affordable Ownership</td> <td>35%</td> <td>38%</td> <td>19%</td> <td>7%</td> </tr> <tr> <td>Affordable Rented</td> <td>44%</td> <td>29%</td> <td>21%</td> <td>6%</td> </tr> </tbody> </table> <p>Source: LHMA 2021 – Table 7.12</p> <p>9.22 Based on the evidence, it is expected that <b>the focus of new market housing provision will be on 2- and 3-bed properties. Continued demand for smaller family housing can be expected from newly forming households.</b> There may also be some demand for medium-sized properties (2- and 3-beds) from older households downsizing and looking to release equity in existing homes, but still retaining flexibility for friends and family to come and stay.</p>		1-bedroom	2-bedrooms	3-bedrooms	4+-bedrooms	Market	11%	34%	45%	11%	Affordable Ownership	35%	38%	19%	7%	Affordable Rented	44%	29%	21%	6%
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### **5.3 Tenure of Affordable Housing**

The Strategic Housing Market Assessment below identified the need for 20% intermediate and 80% social rent. Wherever possible, to help those with the greatest need, social rent homes should be prioritised. STAG has prioritised social rent over shared ownership as set out above.

In line with the desire to maximise occupancy and need, following the introduction of the Localism Act in 2011, fixed tenancies should be considered for the affordable homes. The larger social rent homes are in very short supply across the affordable estate. Currently there are around 1,121 families registered as over-crowded with no stock available to move to.

Richmond and RHP allocation policy should be amended to prioritise key workers, as suggested by the Emerging Plan.

Both key workers and fixed tenancies should be included as a condition for the chosen housing association/registered provider.

## Relevant Policies/Evidence

Policy	Description
<b>National Planning Framework 2021 -</b>	62. ... the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies
<b>London Plan 2021 H6 – Housing Tenure</b>	<p><b>H6 Affordable Housing Tenure</b></p> <p>A The following split of affordable products should be applied to residential development:</p> <ol style="list-style-type: none"> <li>1) a minimum of 30 per cent low-cost rented homes, as either London Affordable Rent or Social Rent, allocated according to need and for Londoners on low incomes</li> <li>2) a minimum of 30 per cent intermediate products which meet the definition of genuinely affordable housing, including London Living Rent and London Shared ownership</li> <li>3) the remaining 40 per cent to be determined by the borough as low-cost rented homes or intermediate products (defined in Part A1 and Part A2) based on identified need.</li> </ol>
<b>Richmond Emerging Local Plan</b>	17.14 Affordable housing does not just benefit the people who reside in these properties. To have a truly mixed and balanced community we need to provide homes that our teachers, firefighters, police officers, nurses, carers, trades people, mechanics, and retail workers can afford. This is not an exhaustive list but without these workers the borough would be simply worse off. <b>Providing genuinely affordable homes for local key workers</b> will also help towards Policy 1 Living Locally and the 20-minute neighbourhood, meaning key workers are able to live and work locally reducing in-commuting and making a more resilient community in the longer term. In addition, having genuinely affordable properties to rent or buy means that residents can have more income to spend in the local economy which benefits local businesses.
<b>Richmond Adopted Local Plan</b>	3.1.29 Affordable housing is a priority in the borough .. Therefore, the Council will pursue all opportunities to maximise affordable housing through a range of measures, including providing more choice in the different types of affordable housing with the aim to provide for different levels of affordability.
<b>Mortlake Development Plan 5.22</b>	The Council will therefore support a mixed tenure residential led mixed use development provided there is a range of other uses to create a vibrant Riverside area and associated employment and leisure opportunities. This should include family housing and the maximum reasonable provision of affordable housing of appropriate tenure mix.

<p><b>Richmond Local Housing Market Assessment – update report 2023 by Icen Projects</b></p>	<p>4.7 The overall affordable needs position of an annual need for 1,123 rented affordable homes and 284 affordable home ownership homes per annum points notionally to an <b>80%/ 20% split between rented affordable provision and affordable home ownership</b>. However the Borough is likely to fall substantially short of meeting needs in full, and there is therefore a case for prioritising those in greatest need which will be those on lower incomes without alternative housing options (or adequate existing housing provision) seeking rented affordable housing. The Council should seek to maximise provision of rented affordable housing provision where opportunities arise.</p>																												
<p><b>Richmond Local Housing Market Assessment – update report 2023 by Icen Projects</b></p>	<p>Update of the Stage 1 report in 2021.</p> <p>1.3 Purpose of the report ... is to consider supported living needs and in the context of a restricted supply of housing within the Borough, to consider a ‘local hierarchy of need’ in terms of how the Council might wish policies to prioritise delivery of different types of homes in the Borough.</p> <p><b>Table 3.12 Occupancy by Tenure, 2011</b></p> <table border="1" data-bbox="542 694 1713 1002"> <thead> <tr> <th></th> <th>Owner Occupied</th> <th>Social Rented</th> <th>Private Rented/ Rent Free</th> </tr> </thead> <tbody> <tr> <td>Under-occupied</td> <td>42,527</td> <td>2,642</td> <td>8,633</td> </tr> <tr> <td>% Households in Tenure</td> <td>83.5%</td> <td>27.1%</td> <td>43.1%</td> </tr> <tr> <td>Right Sized</td> <td>7,685</td> <td>5,989</td> <td>10,006</td> </tr> <tr> <td>% Households in Tenure</td> <td>15.1%</td> <td>61.4%</td> <td>50.0%</td> </tr> <tr> <td>Overcrowded</td> <td>705</td> <td>1,121</td> <td>1,392</td> </tr> <tr> <td>% Households in Tenure</td> <td>1.4%</td> <td>11.5%</td> <td>6.9%</td> </tr> </tbody> </table> <p>Source: 2011 Census</p> <p>6.1 In the context of the constrained land supply within the Borough, it is appropriate for the Council to consider how limited housing provision might be prioritised to meet the more acute needs, within the Framework provided through national policies.</p> <p>6.2 Confirms priorities are genuinely affordable housing (social rent), encouraging those under-occupying to move, supported housing for the most vulnerable residents.</p> <p>6.3 Extra Care housing is also a priority, including private extra care</p>		Owner Occupied	Social Rented	Private Rented/ Rent Free	Under-occupied	42,527	2,642	8,633	% Households in Tenure	83.5%	27.1%	43.1%	Right Sized	7,685	5,989	10,006	% Households in Tenure	15.1%	61.4%	50.0%	Overcrowded	705	1,121	1,392	% Households in Tenure	1.4%	11.5%	6.9%
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<p><b>Richmond Local Housing Market</b></p>	<p>Localism Act 2011 - 2:18 – grant of fixed term tenancies</p>																												

<p><b>Assessment –Dec 2021</b></p>	<p>Social housing tenure reform Under the previous system social landlords were normally only able to grant lifetime tenancies. Sometimes this meant that people acquire a social home at a moment of crisis in their life and continue to live there long after their need for it has passed. Meanwhile there are people waiting for a social home who face much more difficult circumstances. This was unfair and represented a poor use of valuable public resources.</p> <p>The Government has protected the security and rights of existing social housing tenants, including when they move to another social rented home. However, provisions in the Localism Act allow for more flexible arrangements for people entering social housing in the future. <b>Social landlords will now be able to grant tenancies for a fixed length of time.</b> The minimum length of tenancy will be two years in exceptional circumstances with five years or more being the norm. There is no upper limit on the length of tenancy. Councils can still offer lifetime tenancies if they wish. More flexible tenancies will allow social landlords to manage their social homes more effectively and fairly and deliver better results for local communities. “flexible tenancy” has the meaning given by section 107A of the Housing Act 1985.</p>
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## 6. Surplus Secondary School capacity

### Current Position

Application B is for a new 1200 capacity (180 pupils p.a.) secondary school on the southwest of the site. The Mortlake 2011 Planning Brief included a primary school on the site, next to the OOLTI protected sports field. This was changed in October 2015, following a LBRuT Council's Cabinet decision that a secondary school with a sixth form would be preferred. The secondary school footprint in part covers Watney's OOLTI field (see Section 2). The school includes a newly provisioned sports pitch, Multi-Use Games Area to the south with the installation of a 2.5m high clear acoustic fence around the northern and western perimeter of the school sports pitch, set back from the proposed 4.5m high twin bar super rebound fence (mesh weld fence with EPDM inserts) surrounding the sports pitch; and the installation of a 3m high fence around the Multi-Use Games Area. It is hoped, a community use agreement will enable local groups, clubs etc. to use the external pitch, indoor sports hall, and the Multi-Use Games Area out of school hours.

### Planning Assessment

The secondary school has been the most controversial aspect of the scheme and is opposed by local school leaders, who have registered their opposition as an Interested Party. In 2015, there was limited 'Good' secondary school places on the east side of Richmond borough and the birth rate was at its peak of 2,609<sup>1</sup>. Consequentially, Richmond and the DfE agreed to transfer an already approved 1,200 secondary Free School Academy planned for Tower Hamlets, which was no longer required by that authority, to the STAG Brewery site. This decision has never been reviewed, despite evidence presented to DfE that the decision was based upon net school capacity that was incorrectly reported and led to overstated demand forecasts. The STAG proposals therefore still include the provision of this large 1200 pupil secondary school with sixth form.

#### 6.1 Falling Birth Rates

Nine years later circumstances changed. It is well documented that there has been a fall in birth rate and decline in pupil numbers across London. This trend has impacted both the East and West of the Borough, with birth rates peaking in 2015 at 2,609 and falling 30% to 1,827 in 2022. ONS forecasts predict a further fall in 0-18 yrs. population of over 5,000 children in the next 10 years, over 6,000 to 2043, equating to a loss of a further fifteen primary and twenty secondary classes per year group, most in the years to 2033.

#### Table 1 – ONS Population projections by age 2018-2043

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<sup>1</sup> Live birth data – ONS/Nomis, 2015 = 2,609, falling by 782 births to 1,827 in 2022.

### Population projections - local authority based by single year of age

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Age	2018-23	2023-33	2023-43	
0-4	-1,511	-556	194	
5-11	-1,325	-3,079	-3,080	Primary Total
12-16	2,430	-1,971	-2,925	Secondary Total
17-18	664	304	-433	
<b>Total</b>	<b>258</b>	<b>-5,302</b>	<b>-6,244</b>	

#### Ave for each year group

5-11	-440	-440	Primary further loss of 15 classes
12-16	-394	-585	Secondary further loss of 13-20 classes

I attend Schools Forum and Education Committee meetings. There has been regular discussion about the impact on schools' viability as a result of falling birth rates, and pupil declines. The peak birth rate has worked its way through the primary sector and is just starting to impact the local secondary sector. Despite net in-year admission, falling rolls are still having a large impact on schools across the borough. In the January '24 Education Committee meeting the CFO of AFC confirmed there were 6 schools subject to a deficit reduction plan where a significant factor was falling rolls.

### 6.2 Development Yields

Relocations due to a post-covid change in working patterns, the lingering impact of Brexit and the cost-of-living crisis, aggravated by a steep increase in housing costs in Richmond, has also contributed to underlying pupil declines as families move further out of London. Richmond maintains that there is a continued need for 180 secondary school places per year on the STAG Brewery site, because of:

- Recent enquiries from Hong Kong and Ukraine families relocating to the UK. Whilst this has increased in-year admissions on a temporary basis, *net* pupil losses are still predicted; and
- Development population yields from site allocations in the area. A detailed calculation of population yields comparing the GLA, DFE and Achieving for Children (AFC) forecasts from the cumulative developments in the STAG locality and on the STAG site, are set out in Appendix A and summarised in the table below.

**Table 2 - Cumulative Developments - Comparison of GLA and DFE under 18 population Forecasts**

	Cumulative Developments					
	GLA calculator - Population yield			DFE Calculator - State School provision		
	Total	Per yr group	No.of Classes	Total	Per yr group	No.of Classes
Early Years	687			132		
Primary	471	67	2	510	73	2
Secondary	173	35	1	187	37	1
Post 16	74			39		
Special				12		

The biggest contributor to pupil yields is the STAG site.

**Table 3 – STAG Site - Comparison of GLA and DFE under 18 population Forecasts.**

	STAG site							
	GLA calculator		Population yield		DFE Calculator		State school provision	
	Total	Per yr group	No.of Classes		Total	Per yr group	No.of Classes	
Early Years	219				43			
Primary	157	22	0.7		163	23	0.8	
Secondary	72	14	0.5		77	15	0.5	
Post 16	30				21			
Special					4			
All yrs	478				308			
Excluding Early Years	259		8.6		265		8.8	

- The bedroom/tenure mix is input into the GLA /DFE calculator which forecasts the likely child yield. Reasonably precise estimates can be obtained for STAG and Homebase, as the bedroom/tenure mix of units is set out in the planning applications. For the Barnes Hospital site, I have used the latest tenure/unit mix uploaded to Richmond Planning Portal and for the Kew retail site, I have assumed a 50% affordable housing level, in line with the Emerging Local Plan Policy and 2-bed accommodation in line with the Housing Needs Assessment in 2021.
- The DFE calculator forecasts yield for state school provision and the GLA calculator forecasts population yield. As a result, the early years figures show a large discrepancy, as around 75% of early years provision in the borough<sup>2</sup> is through the private sector. Significantly more pupils opt for private education in the East of the borough, than is the case across the borough, therefore we can assume that the forecast demand for state provision using either calculator is likely to be over optimistic. As shown in tables 2 & 3 above, the forecasts from the GLA and DFE are very similar for Primary and Secondary education for both the cumulative developments and the STAG site.

### 6.3 Achieving For Children (AFC) Development Yield Forecasts

AFC set out in detail their development yield forecast methodology in their school Place Planning Document dated March 2023. Para 3.16 forecasts the combined primary and secondary yield from STAG Brewery, Homebase, and Barnes Hospital. I have compared these forecasts to the GLA and DFE calculator, and those submitted by the Applicant for the purposes of this application.

The Applicant’s forecasts are very similar as they are also derived from the GLA calculator. However, AFC takes the forecasts (set out below in para 3.13 of the School Place Planning Strategy document) and applies their alternative formula which more than doubles the yield. Whilst they reduced the forecasts in Nov’23, they are still over 50% greater than the estimates from the DFE and GLA calculator and the Applicant.

<sup>2</sup> Achieving for Children School Place Planning Strategy, March 2023 – para 7.4

In a planning inquiry in 2006, related to Sandy Lane housing development in Teddington brought by Linden Homes, the planning inspector did not sanction the use of AFC's proposed alternative formula, as he felt the formula was generally over-forecasting the number of children who would need a new place (para 3.10 of the school place planning strategy March 2023).

**Table 4 - Comparison of GLA, DFE and AFC forecasts for Primary and Secondary school yields at three main development sites.**

Site	GLA	DFE	AFC, para 3.16 - SPPS, March'23	AFC - Alternate Formula, para 3.13 - SPPS, March '23	AFC - Nov'23	Applicant - March'22	Applicant - Nov'23
STAG	229	240	267	674	358	258	170
Homebase	90	115	59	128			
Barnes	20	23	21	51			
<b>Total</b>	<b>339</b>	<b>379</b>	<b>347</b>	<b>853</b>			

**Source:**

GLA & DFE Yield Calculator

SPPS = School Place Planning Document March 2023

AFC = Achieving for children

- Hounslow (the Borough which neighbours the site), pupil forecasts for the Chiswick side of the ward show a decline in primary admissions continuing into secondary schools. The head teacher at the closest school to the STAG site, Chiswick School, is one of the signatories on the 'Schools' letter to the Inquiry, voicing their concern over the pupil number declines.

#### 6.4 Alternate provision

Within 3 miles of the site, there are 17 secondary schools which have a combined current surplus capacity of over 3,000. The table below shows the capacity within 3.4 miles of the Homebase site, which is only 1.2 miles from STAG, which was included in an updated Health Assessment report for Homebase last year. In line with the Policies below, it is Richmond's responsibility to co-ordinate and assess capacity needs 'locally and sub-regionally, addressing cross-boundary issues'. The Environmental Statement Chapter 7 'Socio-Economics' inaccurately lists schools within the Spatial Area of 3 miles from the site in Table 7.10 as it does not consider the capacity provided locally from schools outside Richmond's administrative boundary.

#### 6.5 Key objections

The objections centre on the inclusion of the large secondary school when justification for the school, over the last 10 years, has become increasingly questionable. There has been no public consultation regarding the inclusion of the secondary school, which was not included in the original Planning Brief.

Our main objections can be summarised as follows:

- There is not a basic need for the additional secondary school places planned under Local and National Planning Policy. The ONS forecast a significant continued fall in pupil numbers to 2043.
- Whilst there are a number of major developments in the area, in the bedroom/tenure mix of those developments market studio/1-bed account for 17% and market 2-bed account for 44%, which results in a relatively low secondary pupil yield.

- The forecast additional development yield of 1 class per year can be accommodated by expansion of existing secondary schools, particularly given the forecast decline in birthrate.
- Increasing total capacity beyond what is needed will threaten the educational quality and viability of existing schools as funding follows pupils.
- The site is ideally placed for the relocation of a local, successful, outstanding primary school, which currently uses the OOLTI field as outside play space. If a secondary school is placed on this site, the primary school children will have **no safe outside area for play times**.
- The current site of this primary school is unacceptably dangerous because of its proximity to a notorious level crossing on a busy road. No meaningful mitigation has been proposed, and only a move to a safer location, on the brewery site, will avoid progressive worsening of the danger (see sections 2 & 4).
- Physical constraints of the site, imply that an area of only 1.89 ha has been allocated to the school, well below that recommended by DfE for such a large secondary school.
- The school will occupy part of an OOLTI field, which is a protected green space under the Local Plan (see section 2).
- The space taken by the secondary school reduces the quantum of affordable housing which is already too low (see section 5).
- The forecast numbers of pupils and staff travelling to and from the school, particularly those travelling some distance given the lack of demand locally, would place a significant strain on the already congested transport system in the area, including Mortlake Station, Sheen Lane, and the Lower Richmond Road. The entrance to the school is close to Chalker's Corner which has a PTAL rating of 1, making this a poor choice of location for such a large school.

### 6.6 Alternate community plan

It is not the case that there is no alternative to the proposed secondary school. We have proposed an alternative Community Plan, supported by community groups and local school leaders who have registered as an Interested Party. This would provide a more balanced solution to the educational, safety and housing needs of the east of the borough by:

- Improving the viability and growth of the existing local secondary schools through limited expansion for local school place needs.
- Relocating a local primary school to the Stag site, in line with the original Planning Brief, providing safe outside space for play,
- Significantly improving safety at the Mortlake Station level crossing and on Sheen Lane,
- Creating space for more affordable homes.

In addition, an alternate scheme was suggested to Richmond Council leader by Thomson House school. If forecasts proved inaccurate and a need for secondary school capacity arose beyond that which existing local secondary schools could accommodate, Thomson House could, if they were on the STAG site, expand to include a 600 pupil, 4 form secondary school from Y7 to Y11 only. Sixth form pupils could then be sent to existing secondary schools to increase their viability.

This suggestion was declined on the basis of it being a through school age 5-16, despite it offering an equal amount of secondary school capacity as the proposed scheme, and a smaller development footprint. This was despite two new through schools (special) age 4-19 being approved in Richmond during the past year, one in Ham, the other on the Barnes Hospital site.

The developer was willing to consider alternative proposals, but the Local Authority has refused to consider any others. For the reasons listed here we maintain that the current proposals fail to comply with several major aspects of planning policy.

The harms caused by the proposals and non-compliance with significant aspects of National, London Plan and Local Plan policy far outweigh any benefits. To invest £20-25m of public money in a school that is not required, when public finances are already stretched, is not defensible.

**Relevant Policies/Evidence**

Policy	Description															
<p><b>E-mail from Lucy Thatcher, Planning Officer on 31-1-24 @9:17</b></p>	<p>The applicants used the same methodology for the education child yield for both March 2022 submission and the Fire Led Design Amends and is based on applying the proposed hosing mix (in terms of tenure and number of bedrooms) to the GLA's Population Yield Calculator which provides an overall population yield and a break-down by age group. The results for eth March 2022 submission and the Fire=led Design Amends are set out below:</p> <table border="1" data-bbox="517 507 1718 695"> <thead> <tr> <th></th> <th>March 2022</th> <th>Fire-led Nov'23</th> </tr> </thead> <tbody> <tr> <td>0-4 year olds</td> <td>252</td> <td>161</td> </tr> <tr> <td>5-11 year olds</td> <td>185</td> <td>120</td> </tr> <tr> <td>12-15 year olds</td> <td>73</td> <td>50</td> </tr> <tr> <td>16-17 year olds</td> <td>38</td> <td>26</td> </tr> </tbody> </table> <p>When compared with the March 2022 submission there is a reduction in the child yield due to the overall reduction in the number of units (-10 compared with the March 2022 submission) as well as changes to the composition of the housing mix (tenure and unit size/bedroom numbers).</p> <p>AFC have revisited the pupil yield in light of changes to the unit make-up, the pupil yield from the development is estimated to be 238 primary school age pupils and 120 secondary age pupils.</p> <p>There are various methods of calculating child pupil yield. The applicants have applied the GLA method and the council their own methodology, which is approved by the DFE.</p>		March 2022	Fire-led Nov'23	0-4 year olds	252	161	5-11 year olds	185	120	12-15 year olds	73	50	16-17 year olds	38	26
	March 2022	Fire-led Nov'23														
0-4 year olds	252	161														
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12-15 year olds	73	50														
16-17 year olds	38	26														

**Homebase,  
Health Impact  
Assessment – May'23  
addendum**

**Table 3.2 Secondary Schools within 3.4 - mile catchment of Proposed Development**

School Name	Capacity	Number of Pupils	Surplus/ Under-supply
West Thames College			0
Richmond-upon-Thames College			0

A-2

**HATCH**

Manor Road HA Update 2012

Gunnersbury Catholic School	1228	1205	23
Christ's Church of England Comprehensive Secondary School	930	971	-41
Elthorne Park High School	1487	1537	-50
Richmond Park Academy	1100	926	174
The Tiffin Girls' School	1001	1229	-228
West London Free School	890	893	-3
Twylford Church of England High School	1372	1570	-198
Chiswick School	1300	1392	-92
Gumley House RC Convent School, FCJ	1220	1125	95
Isleworth and Syon School for Boys	979	1107	-128
Teddington School	1350	1180	170
Waldegrave School	1246	1461	-215
Orleans Park School	1260	1349	-89
Ark Putney Academy	1200	903	297
Grey Court School	1398	1509	-111
Brentford School for Girls	949	872	77
St Richard Reynolds Catholic High School	1080	1014	66
Kingsley Academy	1050	857	193
Fulham Cross Academy	720	474	246
Nishkam School West London	1400	1053	347
The Green School for Girls	940	936	4
The Kingston Academy	1180	1169	11
Ealing Fields High School	840	671	169
The Richmond upon Thames School	750	740	10
The Green School for Boys	1260	647	613
Bolder Academy	1260	684	576
Ark Acton Academy	1400	937	463
Ark Scane Academy	1200	176	1024
<b>Total</b>	<b>31,990</b>	<b>28,587</b>	<b>3,403</b>



<p><b>National Planning Framework 2021</b></p>	<p><b>95.</b> It is important that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. They should:</p> <p>(a) give great weight to the need to create, expand or alter schools through the preparation of plans and decisions on applications; and</p> <p>(b) work with school promoters, delivery partners and statutory bodies to identify and resolve key planning issues before applications are submitted.</p>
<p><b>London Plan 2021 S3</b> - Education and childcare facilities</p>	<p>A To ensure there is a sufficient supply of good quality education and childcare facilities to meet demand and offer educational choice, boroughs should:</p> <ol style="list-style-type: none"> <li>1) prepare Development Plans that are informed by a needs assessment of education and childcare facility needs. Needs should be assessed locally and sub-regionally, addressing cross-boundary issues. Needs assessments should include an audit of existing facilities.</li> <li>2) identify sites for future provision through the Development Plan process, particularly in areas with significant planned growth or need for school places (including Special Educational Needs and Disability places)</li> <li>3) ensure that development proposals for housing and commercial facilities incorporate suitable childcare provision and encourage nursery provision within primary schools, where there is a need.</li> </ol>
<p><b>Richmond Emerging Local Plan – Strategic Policy 50</b></p>	<p>24.29 – the council will assist in identifying sites</p> <p>24.31 – specifies both the STAG Brewery site for secondary education and the Barnes Hospital site for special needs.</p>
<p><b>Richmond Local Plan 2018 LP29</b></p>	<p>A. The Council will work with partners to encourage the provision of facilities and services for education and training of all age groups to help reduce inequalities and support the local economy, by the following means:</p> <ol style="list-style-type: none"> <li>1. supporting the provision of facilities to meet the needs for primary and secondary school places as well as pre-school and other education and training facilities.</li> <li>2. safeguarding land and buildings in educational use.</li> <li>3. identifying new sites for educational uses as part of this Plan; the Council will work with landowners and developers to secure sites for pre-schools, primary and secondary schools as well as sixth forms to ensure sufficient spaces can be provided for children aged 2-18.</li> <li>4. encouraging the potential to maximise existing educational sites through extensions, redevelopment or refurbishment to meet identified educational needs.</li> <li>5. encouraging flexible and adaptable buildings, multi-use and co-location with other social infrastructure</li> </ol>

<b>LBRuT Mortlake Development Plan 2011</b>	5.20 The Council will support the provision of a two-form entry Primary School designed to maximise the potential for community uses and developers should discuss this with the Council at the earliest opportunity to form part of master planning proposals.
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## **Appendix I – Cumulative New Homes and Population Yield at and around the STAG Brewery site**

The table below lists the development sites in Richmond’s Emerging Local Plan or currently subject to planning discussions which are close to the STAG Brewery site and the actual or estimated number of units planned. These cumulative developments will contribute around 2,500 new homes within 1.2 miles of the STAG Brewery site, accommodating at least 5,700 new residents. There is also a new 1,200 secondary school planned on the STAG site and a 90 persons SEMH special school, along with a new adult mental health facility on the Barnes hospital site.

**Table 0 – Site Allocations in the Emerging Local Plan**

Site No.	Site Allocation Emerging Plan	Postcode	Miles to		Actual/		Variance		
			STAG	IDP'24*	Estimated				
35	STAG	SW14 7EX	-	550	1075	-	525		
29	Homebase	TW9 1YB	1.2	385	453	-	68		
38	Barnes Hospital	SW14 8SU	0.7	83	106	-	23		
32	Kew Retail	TW9 4AD	1.0	-	500	-	500		
32	Kew Biothane	TW9 4BD	0.9	88	88	-	-		
-	Richmond Royal	TW9 2TE	1.5	71	71	-	-		
30	Sainsburys	TW9 4LT	0.9	250	250	-	-		
36	Mortlake Delivery Office	SW14 8JB	260 yards	-	0	-	-		
37	Telephone Exchange 172-176 URR	SW14 8AW	0.6	-	0	-	-		
<b>Current Estimate of total homes</b>					<b>1,427</b>	<b>2,543</b>	<b>-</b>	<b>1,116</b>	<b>-78%</b>

**Source:** Emerging Local Plan and Infrastructure Delivery Plan - January 2024 Addendum

Detailed forecasts are set out on the pages below for bedroom mix, tenure and population yield by age for STAG, Homebase, Barnes Hospital and Kew Retail using the GLA population yield calculator<sup>3</sup>. For the remaining smaller sites, the 409 homes and the resultant population yield has been forecast using the GLA calculator in line with Strategic Policy 11 – Affordable Housing in the Emerging Local Plan which assumes 50% Affordable Housing and 2-bed housing in line with the Housing Needs Assessment 2021, which provided evidence for the Emerging Local Plan. I have treated studios as 1-beds for the purposes of the GLA calculator.

### **1. Bedroom and Tenure Mix**

The bedroom mix and tenure are taken from the latest documents uploaded to the Richmond Planning Portal for STAG, Homebase and Barnes Hospital. For tenure, the other sites are forecast in line with the Emerging Local Plan, Policy No. 11 which requires 50% Affordable Homes and for bedroom mix, in line with the Richmond Housing Assessment 2021, which prioritises provision for both smaller family housing and older downsizers who wish to retain space for family and friends to stay, I have therefore assumed 2 bed properties.

<sup>3</sup> <https://www.data.gov.uk/dataset/1dc6f6ae-aa9d-46ee-95e7-486b0579c7f2/gla-population-yield-calculator> version 3.2

**Table 1.0 – Cumulative Developments, Bedroom Mix**

No. of units	Studios	1-bed	2-bed	3-bed	4-bed	Total	
Private	57	384	1113	251	23	1828	72%
Intermediate	0	39	49	0	0	88	3%
Affordable Rent	0	38	522	62	5	627	25%
<b>Total</b>	<b>57</b>	<b>461</b>	<b>1684</b>	<b>313</b>	<b>28</b>	<b>2543</b>	<b>100%</b>

Of which the biggest contributor is the STAG Brewery site:

**Table 1.1 – STAG Brewery, Bedroom mix**

No. of units	Studios	1-bed	2-bed	3-bed	4-bed	Total	
Private	27	271	472	217	23	1010	94%
Intermediate		8	5			13	1%
Affordable Rent			3	44	5	52	5%
<b>Total</b>	<b>27</b>	<b>279</b>	<b>480</b>	<b>261</b>	<b>28</b>	<b>1075</b>	<b>100%</b>

## 2. GLA Population Yield

Using the bedroom mix above, I have used the GLA calculator to forecast the local population. I have assumed a PTAL rating of 0-2, as a default rating. This is the rating applicable to STAG, Barnes Hospital, Kew Retail, Kew Biothane, Mortlake Delivery Office and the Telephone Exchange. The lower PTAL rating, generates marginally higher yields.

**Table 2.1 – Cumulative Developments - GLA Population Calculator Inputs**

	1 bed	2 bed	3 bed	4 bed
Market and Intermediate Units	480	1162	251	23
Social Units	38	522	62	5

	<b>2543</b>
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**Table 2.2 - Cumulative Developments – GLA Population Forecasts**

	Market & Intermediate	Social	Total
Ages 0, 1, 2, 3 & 4	359	328	687
Ages 5, 6, 7, 8, 9, 10 & 11	238	232	471
Ages 12, 13, 14, 15 & 16	73	101	173
Ages 17 & 18	31	43	74
19-64	3275	966	4241
65+	78	23	101
<b>Total Yield</b>	<b>4055</b>	<b>1692</b>	<b>5747</b>

Of which the biggest contributor is the STAG Brewery Site.

**Table 2.3 – STAG Brewery – GLA Population Calculator Inputs**

	1 bed	2 bed	3 bed	4 bed
Market and Intermediate Units	306	477	217	23
Social Units	0	3	44	5

	1075
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**Table 2.4 - STAG Brewery - GLA Population Forecasts**

	Market & Intermediate	Social	Total
Ages 0, 1, 2, 3 & 4	186	33	219
Ages 5, 6, 7, 8, 9, 10 & 11	127	30	157
Ages 12, 13, 14, 15 & 16	46	25	72
Ages 17 & 18	20	11	30
19-64	1772	104	1876
65+	42	2	45
<b>Total Yield</b>	<b>2193</b>	<b>205</b>	<b>2398</b>

### 3. Under 18 Population Yields

#### 3.1 DFE Forecasts

For 0-18 year olds, I have also forecast the various age groups using the DFE population calculator<sup>4</sup>. The DFE calculator forecasts yield for state school provision and the GLA calculator forecasts population yield. As a result, the early years figures show a large discrepancy, as around 75% of early years provision in the borough<sup>5</sup> is through the private sector. As significantly more pupils opt for private education in the East of the borough, around the STAG site, than is the case across the borough, we can assume that the forecast demand for state provision using either calculator is likely to be over optimistic. The forecasts from the GLA and DFE are very similar for Primary and Secondary education for both the cumulative developments and the STAG site. See tables 3.1 and 3.2 below.

<sup>4</sup> <https://explore-education-statistics.service.gov.uk/find-statistics/pupil-yield-from-housing-developments>

<sup>5</sup> Achieving for Children School Place Planning Strategy, March 2023 – para 7.4

**Table 3.1 – Cumulative Developments - Comparison of GLA and DFE under 18 population Forecasts**

Cumulative Developments						
GLA calculator - Population yield			DFE Calculator - State School provision			
	Total	Per yr group	No.of Classes	Total	Per yr group	No.of Classes
Early Years	687			132		
Primary	471	67	2	510	73	2
Secondary	173	35	1	187	37	1
Post 16	74			39		
Special				12		

Off which the biggest contributor is the STAG site.

**Table 3.2 – STAG Site - Comparison of GLA and DFE under 18 population Forecasts.**

STAG site						
GLA calculator			DFE Calculator			
	Total	Per yr group	No.of Classes	Total	Per yr group	No.of Classes
Early Years	219			43		
Primary	157	22	0.7	163	23	0.8
Secondary	72	14	0.5	77	15	0.5
Post 16	30			21		
Special				4		
All yrs	478			308		
Excluding Early Years	259		8.6	265		8.8

The Developer's forecasts for primary and secondary school yield were 258 in March 2022, very similar to the forecasts above, as they used the GLA calculator, albeit, they would have missed 18 year olds. The revised figures in Nov'23 were 170. The reduction reflected the change in unit mix.

### 3.2 Achieving For Children (AFC) Development Yield Forecasts

AFC set out in detail their development yield forecast methodology in their school Place Planning Document dated March 2023. Para 3.16 forecasts the combined primary and secondary yield from STAG Brewery, Homebase, and Barnes Hospital. I have compared these forecasts to the GLA and DFE calculator, and those submitted by the Applicant for the purposes of this application.

The Applicant's forecasts are very similar as they are also derived from the GLA calculator. However, AFC takes the forecasts (set out below in para 3.13 of the School Place Planning Strategy document) and applies their alternative formula which more than doubles the yield. Whilst they reduced the forecasts in Nov'23, they are still over 50% greater than the estimates from the DFE and GLA calculator and the Applicant.

In a planning inquiry in 2006, related to Sandy Lane housing development in Teddington brought by Linden Homes, the planning inspector did not sanction the use of AFC's proposed alternative

formula, as he felt the formula was generally over-forecasting the number of children who would need a new place (para 3.10 of the school place planning strategy March 2023).

**Table 3.3 - Comparison of GLA, DFE and AFC forecasts for combined Primary and Secondary school yields at three main development sites.**

Site	GLA	DFE	AFC, para 3.16 - SPPS, March'23	AFC - Alternate Formula, para 3.13 - SPPS, March '23	AFC - Nov'23	Applicant - March'22	Applicant - Nov'23
STAG	229	240	267	674	358	258	170
Homebase	90	115	59	128			
Barnes	20	23	21	51			
<b>Total</b>	<b>339</b>	<b>379</b>	<b>347</b>	<b>853</b>			

**Source:**

GLA & DFE Yield Calculator

SPPS = School Place Planning Document March 2023

AFC = Achieving for children

### 1. STAG Brewery site, SW14 7EX

#### Emerging Local Plan – Site Allocation 35

Richmond ref:

- Application A – 22/0900/OUT – Residential
- Application B – 22/0902/FUL – School

GLA ref; APP/L5810/W/24/3339060

The postcode SW14 7EX is for the rented offices in the middle of the Brewery site, at the Network Business Centre, 46 Lower Richmond Road, Mortlake. Note SW14 7ET – the postcode listed on the Richmond Planning Portal, is not listed on the Royal Mail postcode finder website and measures from various locations on Sheen Lane, not the Brewery site entrance on Mortlake High Street, or the Lower Richmond Road.

#### Bedroom Mix

No. of units	Studios	1-bed	2-bed	3-bed	4-bed	Total	
Private	27	271	472	217	23	1010	94%
Intermediate		8	5			13	1%
Affordable Rent			3	44	5	52	5%
<b>Total</b>	<b>27</b>	<b>279</b>	<b>480</b>	<b>261</b>	<b>28</b>	<b>1075</b>	<b>100%</b>

#### GLA Population Calculator Inputs

	1 bed	2 bed	3 bed	4 bed
Market and Intermediate Units	306	477	217	23
Social Units	0	3	44	5

<b>Total Unit</b>	<b>1075</b>
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	Market & Intermediate	Social	Total
Ages 0, 1, 2, 3 & 4	186	33	219
Ages 5, 6, 7, 8, 9, 10 & 11	127	30	157
Ages 12, 13, 14, 15 & 16	46	25	72
Ages 17 & 18	20	11	30
19-64	1772	104	1876
65+	42	2	45
<b>Total Yield</b>	<b>2193</b>	<b>205</b>	<b>2398</b>



## 2. Homebase, Manor Circus, TW9 1YB

### Emerging Local Plan – Site Allocation 29

#### Walking distance to STAG site, SW14 7EX calculated on google maps - 1.2 miles

Richmond ref: 19/0510/FUL

GLA ref: 2020/6252/S3 – 453 units (280 Market, 70 Intermediate and 103 Affordable rent). GLA determining the application. A draft decision notice has been issued. No Financial viability statement was required as the affordable homes contribution was 38%, above the 35% threshold in the London Plan.

### Bedroom and Tenure Mix

Uploaded to Richmond Planning Portal as 'Area schedule' on 9-10-23

No. of units	Studios	1-bed	2-bed	3-bed	4-bed	Total	
Private	30	86	145	19	0	280	62%
Intermediate		26	44	0	0	70	15%
Affordable Rent		31	57	15	0	103	23%
<b>Total</b>	<b>30</b>	<b>143</b>	<b>246</b>	<b>34</b>	<b>0</b>	<b>453</b>	<b>100%</b>

### GLA Population Calculator Inputs

	1 bed	2 bed	3 bed	4 bed
Market and Intermediate Units	142	189	19	0
Social Units	31	57	15	0

<b>Total Unit</b>	<b>453</b>
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### GLA Population Yield

	Market & Intermediate	Social	Total
Ages 0, 1, 2, 3 & 4	55	42	98
Ages 5, 6, 7, 8, 9, 10 & 11	36	31	66
Ages 12, 13, 14, 15 & 16	9	15	24
Ages 17 & 18	4	6	10
19-64	571	154	725
65+	14	4	17
<b>Total Yield</b>	<b>689</b>	<b>252</b>	<b>940</b>

### 3. Barnes Hospital, South Worple Way, SW14 8SU

#### Emerging Local Plan – Site Allocation 38

#### Walking distance to STAG site, calculated on google maps – 0.7 miles

Richmond ref: 22/3758/FUL – New 90 pupil SEMH special school age 4-19 and adult mental health facility, approved on 10 May 2023

Richmond ref: 21/3107/FUL – 106 residential units, in progress. The latest accommodation schedule was uploaded to the Richmond Planning Portal on 24-11-22 and included (83 Market, 5 Intermediate and 18 Affordable rent).

#### Bedroom and Tenure Mix

#### Accommodation schedule -uploaded to the Richmond Planning Portal on 24-11-22

No. of units	1-bed	2-bed	3-bed	4-bed	Total	
Private	27	41	15		83	78%
Intermediate	5				5	5%
Affordable Rent	7	8	3		18	17%
<b>Total</b>	<b>39</b>	<b>49</b>	<b>18</b>	<b>0</b>	<b>106</b>	<b>100%</b>

#### GLA Population Calculator Inputs

	1 bed	2 bed	3 bed	4 bed
Market and Intermediate Units	32	41	15	
Social Units	7	8	3	

<b>Total Units</b>	<b>106</b>
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#### GLA Population Yield

#### Barnes - Population Yield from Development (persons)

	Market & Intermediate	Social	Total
Ages 0, 1, 2, 3 & 4	15	7	21
Ages 5, 6, 7, 8, 9, 10 & 11	10	5	15
Ages 12, 13, 14, 15 & 16	3	3	6
Ages 17 & 18	1	1	2
19-64	148	27	175
65+	4	1	4
<b>Total Yield</b>	<b>181</b>	<b>42</b>	<b>223</b>

#### 4. Kew Retail Park, Bessant Drive, Kew, TW9 4AD

Walking distance to STAG site, calculated on google maps – 1.0 miles

##### Emerging Local Plan – Site Allocation 32

There are 2 sites in Kew in error listed as No.32, Kew Retail Park is one of them.

Public consultation by the developers JTP Architects has taken place and draft schemes presented at community meetings with the developers and Richmond council present. It is expected that there will be a range of bedroom mix/tenure. For the purposes of estimating population yields, I have included 50% 2 bed flats and 50% affordable housing, with PTAL 0-2, to estimate forecast yields, which is in line with Emerging Local Plan Policy and the Housing Needs Assessment, 2021.

Submission of the planning application is expected this year. The number of residential units estimated was reduced after M&S (who own half the site), no longer wished to develop their part of the site.

#### Bedroom and Tenure Mix - assume 50% Affordable as set out in Strategic Policy 11 – Affordable Housing

##### Kew - Estimated accommodation schedule

No. of units	Studios	1-bed	2-bed	3-bed	4-bed	Total	
Private			250			250	50%
Intermediate						0	0%
Affordable Rent			250			250	50%
<b>Total</b>	<b>0</b>	<b>0</b>	<b>500</b>	<b>0</b>	<b>0</b>	<b>500</b>	<b>100%</b>

##### GLA Population Calculator Inputs

	1 bed	2 bed	3 bed	4 bed
Market and Intermediate Units		250		
Social Units		250		

<b>Total Unit</b>	<b>500</b>
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##### Kew -Population Yield from Development (persons)

	Market & Intermediate	Social	Total
Ages 0, 1, 2, 3 & 4	57	135	192
Ages 5, 6, 7, 8, 9, 10 & 11	36	92	128
Ages 12, 13, 14, 15 & 16	8	32	40
Ages 17 & 18	3	13	17
19-64	430	376	806
65+	10	9	19
<b>Total Yield</b>	<b>545</b>	<b>657</b>	<b>1202</b>

**5. Remaining Site Allocations in Richmond’s Emerging Local Plan**

Site No.	Site Allocation Emerging Plan	Postcode	Miles to STAG	IDP'24*	Actual/ Estimated
32	Kew Biothane	TW9 4BD	0.9	88	88
-	Richmond Royal	TW9 2TE	1.5	71	71
30	Sainsburys	TW9 4LT	0.9	250	250
36	Mortlake Delivery Office	SW14 8JB	260 yards	-	0
37	Telephone Exchange 172-176 URR	SW14 8AW	0.6	-	0
<b>Current Estimate of total homes</b>				<b>409</b>	<b>409</b>

Source: Emerging Local Plan and Infrastructure Delivery Plan - January 2024 Addendum

**GLA Population Calculator Inputs – assume 50% Affordable as set out in Strategic Policy 11 – Affordable Housing**

	1 bed	2 bed	3 bed	4 bed
Market and Intermediate Units		205		
Social Units		204		

**GLA Population Yield**

**Additional Housing shown in the IDP health Addendum - extra 409 units**

	Market & Intermediate	Social	Total
Ages 0, 1, 2, 3 & 4	47	110	157
Ages 5, 6, 7, 8, 9, 10 & 11	30	75	105
Ages 12, 13, 14, 15 & 16	7	26	33
Ages 17 & 18	3	11	14
19-64	353	306	659
65+	8	7	16
<b>Total Yield</b>	<b>447</b>	<b>536</b>	<b>983</b>

Appendix 2 – Chalker’s Light scheme – Waterman Environmental Statement Appendix 8.1 – Transport Assessment

