

LOCAL AREAS: RICHMOND

Proposal **R04** **Friars Lane car park**
Modification ref: **D/R04/01**

Issues

- (i) Friars Lane car park is not surplus to requirements.
- (ii) Nearby on-street parking would be the first alternative choice of casual parkers and would bear adversely on residents' opportunity to park.
- (iii) There could be sufficient capacity elsewhere to absorb the loss of spaces.
- (iv) Friars Lane car park should be retained as it is needed by the disabled and elderly.
- (v) The resultant benefits of its retention to the viability of Richmond town centre would outweigh the financial return of a sale.
- (vi) Redevelopment for both parking and housing could generate revenue for the Council.

Inspector's appraisal and conclusion

Friars Lane car park is not surplus to requirements

11.35. This 63 space car park is in the Richmond Riverside Conservation Area on the edge of Richmond town centre, within 35m of the Thames towpath, and is hard by various Listed Buildings and Buildings of Townscape merit. Its use is subject to charges during shopping hours. The LPA does not challenge Mr Willan's figures on usage of this and other town centre car parks. They are broadly consistent with the Council's regular counts which show 75-80% usage during the week and more intensive use on Saturdays, peaking on Saturday afternoon. Early morning surveys show little use by local residents holding parking permits allowing free overnight use from 1730 hrs until 0930 hrs on weekdays.

11.36. Mr Willan does not oppose the cessation of parking at this site and does not dispute the LPA's conclusion that there is spare parking in the town centre overall. His objection includes an alternative proposal for the reorganisation of parking in the whole of the town centre and Lower Richmond Hill area. I consider that goes far beyond the scope of Proposal R4. However, it is the subject of the Council's current general review of parking in the town centre. My considerations here are therefore limited to the most immediate consequences of the Proposal.

11.37. This site comprises less than 4% of the parking capacity of the town centre. Surveys show vacancies elsewhere at the time of maximum demand are about 3 times the capacity of Friars Lane. I conclude that in terms of town centre demand Friars lane is not needed and in accordance with the advice in paragraph 31 of PPG3 and Paragraph 3A.19 of the draft London Plan it is appropriate that it be allocated for housing. I consider the site is visually unattractive in a highly sensitive part of the town and its development would offer a rare opportunity to enhance the Conservation Area.

Nearby on-street parking would be the first alternative choice of casual parkers and would bear adversely on residents' opportunity to park.

11.38. Mr Willan's Saturday survey showed shopping as the predominant motivation for parking at this site with, in my view unsurprisingly, Richmond Green and Old Deer Park as the leading alternative locations. I do not question that in that situation Richmond Green would be unlikely to accommodate demand displaced from Friars Lane.

11.39. Failure to find a place at Friars lane at times of maximum demand by visitors and residents alike results in drivers circling the Green seeking a public or shared-use (residents' permit or public)

on-street space. While I agree that the presence of large numbers of cars is not conducive to the visual attraction of the Green I consider its location weighs against the abolition of parking. At the same time I note that there are 1760 spaces in the town as a whole, of which the 240 in central Richmond include 150 on-street shared use spaces and 27 metered bays. Permit holders compete for the use of 67 resident-only bays and with visitors for the shared spaces.

11.40. Mr Willan suggests that 68 of the shared spaces be made 'residents' only', thus providing 135 exclusively residents' spaces. As his own survey shows fewer than 100 resident permit holder cars parked at a time of peak demand I consider that suggestion excessive. Furthermore, the exclusion only of casual parking from the Green would not enhance visual amenity. In any case I bear in mind the preference residents enjoy in shared spaces between 0830 hrs and midnight. Given the significant attraction of the Green for visitors I am not convinced it is appropriate to curtail casual parking there.

There could be sufficient capacity elsewhere to absorb the loss of spaces.

11.41. A further notion pursued by Mr Willan is that of transferring residents' spaces away from the Green entirely and providing 111 dedicated spaces at Old Deer Park out of 170 further spaces to be provided there. However, that suggested increment would also necessitate the removal elsewhere of several voluntary organisations and has far-reaching implications. In particular I note that, apart from any public concern about such disturbance of charitable bodies, any relocation would involve negotiation with the Crown Estates and the liability of the Council to pay compensation. While that might be part of the Council's overall current review of parking I do not consider it appropriate to introduce alternative sites at this stage of the UDP.

11.42. While I agree that charging policies can influence parking choices I am satisfied that is a matter the Council retains under permanent review independently of the UDP modifications. While the Council is concerned to explore the feasibility and affordability of car pool schemes they are general transport matters irrelevant to the Friars Lane Proposal.

Friars Lane car park should be retained as it is needed by the disabled and elderly.

11.43. The Green Party values the social inclusion afforded by ground-level parking, whereas multi-storey parks rely on lift access and neither CCTV nor attendants reduce the perception of danger and risk in such buildings. I note that lift access is available at Paradise Road. While I have some sympathy with the concern about security it is based on a general perception rather than evidence of the local situation. As to providing for the disabled I shall recommend that the closure of Friars Lane should be linked to a review of the nearest on-street provision.

The resultant benefits of its retention to the viability of Richmond town centre would outweigh the financial return of a sale.

11.44. The Green Party's objection relates to a general objection to Policy CCE3/2 regarding the disposal of Council property, arguing that assets likely to appreciate should not be sold unless the proceeds be devoted to acquiring other freehold property. However, I do not consider the argument germane to the UDP. It is further argued that the Council has a duty to protect the viability of the community. However, given the range of public car parking available elsewhere in the town and the general economic buoyancy of the town centre reported in Health Check 2003 I do not consider the loss of parking at Friars Lane significant in this respect.

Redevelopment for both parking and housing could generate revenue for the Council.

11.45. European Consultancy Services advocate redevelopment of the site with residential development incorporating a computer-controlled high density underground silo parking system including on-site parking for residents. As any such development would include housing I do not deem it appropriate to regard this proposal as an objection to Proposal R4.

Conclusion

11.46. In summary, subject to the safeguarding of adequate on-street parking for the disabled at Richmond Green I support Proposal R4.

RECOMMENDATION

11.47. I recommend that the UDP be modified by D/R04/01 subject to the provision of adequate replacement parking spaces for the disabled on-street at Richmond Green.

Proposal	R07	Richmond Station and air track rights
Modification ref:	D/R07/1	

Inspector's note

Mr Chappell's objection is identically worded with those made to various policies and proposals about losses of MOL and recreational open space. There are no implications for these in this Proposal.

Issues

- (i) Westminster House should not be included in the station redevelopment boundary but Drummonds Place and the open station car park to the east should be within it.
- (ii) Larger modern retail uses would change the mix of uses and increase the retailing capacity of the site. The Proposal should caution against any increase in the capacity of activities which might have a negative impact on the town.

Inspector's appraisal and conclusion

Westminster House should not be included in the station redevelopment boundary but Drummonds Place and the open station car park to the east should be within it.

11.48. A high quality transport interchange is the subject of a planning brief adopted in March 2002 since when further negotiations have taken place between the railway authority and the Council. The brief identifies the core site as that within the (former) Railtrack ownership, Optima Properties, and Westminster House. The proposal includes entertainment and meeting facilities and office accommodation. Westminster House was included in order to improve the arrangements for the bus interchange in response to specialist advice that part of both non-rail sites on the Kew Road frontage would be needed. I note that the advantages of a site more extensive than the railway property were recognised in the Inspector's Report on the initial UDP review representations and I find no reason to differ from that view.

11.49. The LPA states that the carriageway of Drummond Place and the open car park east of the site are not shown as within the R7 boundary as they are not essential to the provision of interchange facilities and could be considered when specific redevelopment proposals emerge. As they do not affect the Kew Road frontage I do not consider their inclusion in Proposal 7 imperative.

11.50. It is not appropriate for me to comment on a currently undetermined planning application for works at Westminster House. The Optima group of Companies claim there is no material change from Proposal R16 in the adopted 1996 UDP. However, it appears to me that the 2001 Inspector's Report, 2002 planning brief, and subsequent negotiations have a significant bearing on the scale of the present

Proposal. The objector also comments on the potential effect on the Conservation Area of a new pedestrian amenity space outside the station. However, it would for the promoters of any scheme to show that their proposals would preserve or enhance the Area.

The Proposal should caution against any increase in the capacity of activities which might have a negative impact on the town.

11.51. I consider the project brief and the justification for the Proposal support the cautious approach advocated by Mr Willan to the mix of uses in redevelopment.

RECOMMENDATION

11.52. I recommend that the UDP be modified by D/R07/1.

Proposal	R09	Land at rear of 10
Kings Road		
Modification ref:	D/R09/1	

Issue

Whether reference to the elderly should be restored to the wording of Proposal R9 and its reasoned justification.

Inspector's appraisal and conclusion

11.53. The objector reasons that the original wording should be restored and indicates that the development should be for residents of retirement age accommodated in small low-rise dwellings without garages and with landscaping incorporating the existing trees. Such use would be compatible with that of Kingsbury House, not detract from the amenities enjoyed by local residents, and would preserve the character of the Conservation Area.

11.54. Subject to design considerations, the principle of the development of the site is not in dispute. The LPA argues that in spite of the high proportion of people over 65 in the Borough the demand for small dwelling units for that age group is already met or could be met within the private market generally. The only reason therefore to restrict occupancy to the elderly would be in the case of a sheltered housing scheme, for which the site is too small. The provision of new affordable housing for the elderly is not a priority in the Council's Housing Strategy.

11.55. In considering this objection I am mindful that the site is the open rear part of the curtilage of Kingsbury House, a 3-storey late 19th century building accommodating a residential home for 19 elderly people. In view of the proximity of the site to Kingsbury House I consider the objector's concern for the neighbourliness of any development is a sustainable argument with an important bearing on the age range of the occupants of any dwellings on the site. On the other hand I agree with the LPA that the scale of the possible development does not warrant the preparation of a development brief.

RECOMMENDATIONS

11.56. I recommend that:

- (i) The UDP be not modified by D/R09/1.**
- (ii) The title of Policy R9 read:**

HOUSING FOR THE ELDERLY

and the reasoned justification read:

The development should be for occupants of retirement age and consist of low-rise small dwellings without garages, but with an access drive and turning space for visitors, and landscaping incorporating existing trees. The development should be compatible with the existing use of Kingsbury House, not detract from the amenities enjoyed by residents of the surrounding area, and preserve the character of the Conservation Area.

Proposal	R11	Church Road: bridge strengthening
Modification ref:	D/R11/1	
Further Modification Ref:	D/R11/2	

Issues

- (i) There is no justification for linking this proposal to either pedestrianisation of George Street or the proposal to redevelop the station.
- (ii) Either development would result in increases in heavy traffic, noise, and pollution with a resultant threat to the safety of pedestrians and cyclists and a deterioration in residential amenity. Vibration caused by traffic would be detrimental to the structural integrity of the Victorian houses in the road. Property values would consequently fall.
- (iii) Heavy goods vehicles would have difficulty in manoeuvring at certain junctions, notably at that with Kew Road.
- (iv) Alternative routes should be considered.

Inspector's appraisal and conclusions

There is no justification for linking this proposal to either pedestrianisation of George Street or the proposal to redevelop the station.

11.57. Although as a local distributor road Church Road is a link in a north - south route bypassing the town centre, the type and volume of traffic is constrained by the weight restriction. The question of the strengthening of the bridge having been raised in the previous inquiry, the proposed modification seeks to indicate in further detail in accordance with the Inspector's recommendation, the way in which any proposal would be considered.

Either development would result in increases in heavy traffic, noise, and pollution with a resultant threat to the safety of pedestrians and cyclists and a deterioration in residential amenity, threatening in particular the structural integrity of houses.

11.58. I am mindful that the 5 tonne weight limit applying to traffic on Church Road exists because of the condition of the railway bridge rather than as a recognition of the residential amenity and structural integrity of property enjoyed by occupiers of buildings along the road. I accept that the strengthening of the bridge would permit the diversion of heavy vehicular traffic from George Street which, together with pedestrianisation of that street, would benefit users of the town centre. It could also, or alternatively, be an integral part of any future scheme for the redevelopment of Richmond Station taking advantage of the opportunity for development in the air space above the rail tracks. Any such benefits would fall to be weighed against the disadvantages cited by the objectors. I am satisfied that the

reference in the proposed change to the modification of such Policies as TRN2(g) and BLT30 is relevant to how the impact on the residential amenity of frontage properties in Church Road of any works undertaken to raise the weight restriction on the railway bridge would be assessed.

Heavy goods vehicles would have difficulty in manoeuvring at certain junctions, notably at that with Kew Road.

11.59. By reason of the cost of diverting underground services the LPA concedes that improvement of the geometry of the junction with Kew Road is unlikely. As for the possible redevelopment of the station a planning brief has been drawn up but as no planning application has been made there is currently no firm proposal. In respect of the bridge the brief's Design Guidelines plan shows no more than 'reinstate walls to bridge where missing' in spite of the existing carriageway narrowing to 6.3m. While the pedestrianisation of the town centre is a worthy aspiration its implementation has only reached the subject of a feasibility investigation in Proposal R1. No consequential reassignment of traffic yet been considered.

Alternative routes should be considered.

11.60. As to alternative routes I am not convinced of an objector's view that Paradise Road should be restored to two-way working would be feasible. It appears to me that would involve the loss of a southbound bus lane. An alternative northward through route from Richmond Hill at the Star and Garter Home via B353 Queen's Road would involve passage through the Kew locality on a road of lesser value as a through connection than the A316. It would also involve the passage of the level crossing at Manor Road where the off-peak rail traffic of 16 trains an hour already causes, from my observation, substantial delays. Were the strengthening to be carried out it is likely that the goods vehicle weight restriction would be raised to the 7.5 tonnes of the town centre zonal lorry ban, which could be extended to Church Road. In my view that is reasonable for a Local Distributor Road.

11.61. However, since neither proposal is sufficiently firm I consider Proposal R11, as proposed to be amended by D/R11/1 and D/R11/2, has no immediate rationale. In the event of either proposal coming forward within the life of the Plan any advantage likely to be conferred by them would have to be balanced against the degree of loss of residential amenity to the occupiers of Church Road properties. As the LPA's proposed change to the modification R11 instances, that can be carried out under other Policies of the Plan. I therefore consider R11 otiose.

RECOMMENDATION

11.62. I recommend that the Plan be not modified by proposal R11.

Proposal	R14	From A3 at Robin Hood Gate, via Richmond Park
Modification ref:	D/R14/1	

Inspector's note

As this proposal has been implemented it does not fall to me to make any recommendation.

Proposal **R16** **Langholm Lodge,**
Petersham Road
Modification ref: **D/R16/1**

Issues

- (i) The Proposal contradicts the Policy ENV11 principle of retaining and improving open spaces, including MOL. The House was originally an integral part of Terrace Gardens and the site should be reabsorbed in that public open space. Development would create a visual barrier between the Gardens and the river.
- (ii) The stables should be retained together with the tunnel to the riverside and converted to a visitors' centre for Richmond Hill, Terrace Garden, Buccleugh Gardens, and Petersham Meadows without affecting the disposal of Langholm Lodge itself.

Inspector's appraisal and conclusion

The proposal contradicts the Policy ENV11 principle of retaining and improving open spaces, including MOL.

11.63. No loss of MOL or public open space is involved since the Proposal mainly concerns the residential use of the existing buildings with any extensions considered against the local environmental constraints. However, as the site is in a highly sensitive area I consider it should be subject to a planning brief.

The stables should be retained and converted to a visitors' centre.

11.64. The notion of retaining the stables for a use allied to the recreational attractions of the locality is in my view one that merits consideration in the planning brief I mention above.

RECOMMENDATION

11.65. I recommend that the UDP be modified by D/R16/1, subject to the addition of the following to the justification:

subject to the devising of a planning brief which should include the retention of the stables for a use allied to tourism and recreation in the locality.

Proposal **R17** **Terrace Yard, Petersham Road**
Modification Ref: **D/R17/1**

Issues

- (i) MOL would be lost.
- (ii) Public open space would be lost.
- (iii) There would be conflict with the *Arcadia in the City* project.
- (iv) Parking for Richmond Canoe Club and those accessing the river and terrace gardens would be lost.
- (v) Housing would encroach on a rural setting and involve loss of visual amenity.

Inspector's appraisal and conclusions

MOL would be lost.

11.66. The yard is surplus to the Council's requirements as a park servicing area, save for a small part adjoining Terrace Gardens that would be retained for operational use. It was designated MOL in 1980. Objectors concede its unattractiveness but emphasise that its poor condition is not a sufficient reason not to incorporate it in Terrace Gardens. The LPA's reference to a local overprovision of open space is held inappropriate. The LPA explains its selection of the site in the context of its being one of the last six identified for de-designation after a sieve examination of a very large number of sites.

11.67. The LPA claims that the site's de-designation is not motivated by its condition but by the fact that it fulfils none of the 6 MOL functions defined in policy ENV1 of the UDP. I agree with that analysis. Indeed, nor to my mind does it fulfil either the 3 function in paragraph A2.62. of the draft London Plan or satisfy the 3 criteria in paragraph 3D.47 of that document since its openness has no significant value to London as a whole.

11.68. Receipts from the disposal of the site would be devoted to the Council's Parks Endowment Fund that has been set up to support a very substantial backlog of work on the borough's public open spaces. The requisite Borough-wide expenditure is estimated at £4.6 million whereas the annual allocation of funds from Council revenues is £100,000. Though objectors claim that external funds could be obtained, the LPA unsurprisingly asserts that the Borough as a whole is not seen as a high priority area for attracting external resources for expenditure on open spaces. That clearly applies with even greater force to the Richmond-Petersham-Ham area, which with Richmond Hill itself, is particularly well endowed with public open space. Objectors doubt that the Parks Endowment Fund would be sustained as a hypothecated funding objective but I am satisfied from legal precedent quoted by the LPA that it could enjoy ring-fenced protection against the transfer of resources to other Council activity.

Public open space would be lost

11.69. Though its function is ancillary to Terrace Gardens I find the site has never been public open space in the sense of an area to which the public have access. While no public open space would therefore be lost the Proposal obviously prevents the site becoming so. However, since I consider that in the context of the other issues involved that is a remote prospect I support the proposal.

There would be conflict with the *Arcadia in the City* project.

11.70. The *Arcadia in the City* project embraces planned projects and improvements along the Thames from Teddington to Richmond in a partnership between the Council, landowners and other interested organisations and requires a third of the requisite resources to be raised in the community. The Thames Landscape Strategy covers the river from Hampton to Kew and is a partnership of all relevant boroughs and other interests as well as being a partner in the *Arcadia in the City* project. Objectors consider the disposal of the site for housing would conflict with both the *Arcadia in the City* project and the Thames Landscape Strategy. The *Arcadia in the City* project does not include any proposal for the site or for the restoration of the adjoining Terrace Gardens which, as I observed, are subject to widespread ground slumping. Their restoration will depend on a successful Heritage Lottery Fund bid but will require matching local finance.

11.71. While the Thames Landscape Strategy does not preclude the development of the site regard would need to be paid to views from Richmond Hill. From the higher ground of Terrace Gardens at the immediate rear of the site it is currently concealed from view by mature vegetation as is also the

case in the extensive panoramic view from the upper part of the Gardens and Richmond Hill itself. Although the visibility of any development would require careful examination I consider it highly unlikely that reasonable objection could be sustained on the ground of visual intrusion. At Petersham Road the unsightly view of the interior of the yard through the gates would be eliminated, though comparable advantages in the improvement of this part of the approach to Richmond town would equally apply to public open space use.

Parking for Richmond Canoe Club and those accessing the river and Terrace Gardens would be lost.

11.72. It is claimed that the loss of parking would make it difficult for the Canoe Club to function and might necessitate its closure, contrary to its contribution to an active, lively, and safe waterway. However, the site does not provide public parking and the canoe club's use is on a temporary basis pending redevelopment of premises on the river side of Petersham Road. While I sympathise with the club's immediate difficulty I consider this merits less weight than the prospect of residential redevelopment.

Housing would encroach on a rural setting and involve loss of visual amenity.

11.73. The site is in a distinctively Arcadian rather than a rural setting and in my view its current use contributes only negatively to visual amenity. Alternative uses suggested by objectors include a base for voluntary groups, community river-related and other recreational activity. Others represented that additional housing would require additional recreational facilities and that utility services were already at capacity. However, compared with its existing use I do not consider that its development for housing would cause loss of visual amenity if undertaken sensitively with respect for the character of its immediate surroundings. In coming to that conclusion I bear in mind that there are other neighbouring developments which do not detract from the river setting or views from Richmond Hill.

RECOMMENDATION

11.74. I recommend that the UDP be modified by D/R17/1.

Proposal	R18	Land at Petersham Road (Gothic Site)
Modification ref:	D/R18/1 D/R18/2	

Issues

- (i) MOL and public open space would be lost.
- (ii) The Proposal is contrary to the Council's New Visitor Strategy, and the Walking and other Strategies.
- (iii) The Proposal would be detrimental to visual amenity.
- (iv) The Proposal is contrary to the *Arcadia in the City* project and the Thames Landscape Strategy
- (v) There would be deleterious effects on wildlife and loss of trees and shrubs.
- (vi) The site is inappropriate for housing.
- (vii) The effect of development on traffic and parking could be unacceptable.

Inspector's appraisal and conclusion

Current use

11.75. The site is the upper part of the southernmost of 4 'pocket parks' which are accessed from the landward side of the Thames towpath in the area down to Richmond Bridge. It is about 0.8 ha in extent; a further open area extends about 0.4 ha westwards to meet the towpath. It has been public open space since the 1930s when the house on the site was demolished. Pedestrian gates to Petersham Toad are kept locked in view of the immediate drop in level to the park area. It serves as an occasional refuge from flooding of the towpath but egress necessitates scaling of the gates.

MOL and public open space would be lost.

11.76. The Proposal is made on the ground that the site is less well used than other public open spaces and the benefits of its disposal for housing would outweigh any loss of amenity. The sale proceeds would be devoted to the Council's Park Endowment Fund to which I refer in relation to Proposal 17 above. D/R18/2 would require landscaped public access through the site. The LPA concedes that though the site justifies MOL status on a limited number of criteria its small extent and the fact that there are many larger and more attractive areas of public open space nearby justifies its disposal in the more important interest of meeting demand elsewhere through the Fund. Accordingly, the site is treated consistently with paragraphs 7.2 and 7.8 of RPG3 and the provision made for the review of MOL boundaries in paragraph 3D.48 of the draft London Plan.

11.77. Though the general tenor of objections is that MOL should be protected whatever the conditions in my view the question is whether sufficiently exceptional circumstances have been demonstrated to justify the Proposal. In the absence of any objective survey data the evidence of use as public open space is conflicting. The LPA regards it as light, whereas local residents claim it has been well used over many years and its current relative unattractiveness is due to neglect by the Council.

11.78. In view of the abundance of public open space in the near vicinity I am not convinced that the loss of that part of the original house curtilage in the Proposal site would be serious. However, strategic considerations apply to MOL. To my mind the pattern of development and intermittent small open spaces between the towpath and Petersham Road is, together with the larger spaces in the Richmond Riverside/Petersham locality, of outstanding strategic significance which contributes to the character of London as a whole. In that context I consider this tract of MOL should not be lost.

The Proposal is contrary to the Council's New Visitor Strategy, and the Walking and other Strategies.

11.79. Objectors refer to the promotion of walking, cycling and the use of public transport as strategic matters. However, none of those activities would be impeded by the Proposal and the provision of ramped access from Petersham Road would be an improvement. The Blue Ribbon Network does not preclude development but requires its design to be of high quality. I accept there is no conflict with the Management Plan for the Thames Path National Trail. The *Green Spaces - Better Places* report of the former DTLR is dismissed by the LPA as irrelevant as it refers to the management of existing open spaces. However, that is only the case if the Proposal be implemented. Further, the LPA considers the potential contribution to the Parks Fund is a justifiable special circumstance outweighing the objection by the Mayor of London. As I explain in relation to the MOL above and visual amenity below I do not consider that is a sufficiently weighty reason in this case to dispose of the site.

The Proposal would be detrimental to visual amenity.

11.80. I comment below on the 2 trees at the top of the site. In my view their essential retention would pose considerable difficulty in reconciling through public access with residential privacy in developing a frontage of no more than about 35m. In a wider sense, although the river is masked

from Petersham Road by foliage in summer, this is the major part of one of the pocket parks which distinguish the locality in the intimate and charming succession of buildings of domestic scale interspersed with open spaces in the approximately 550m distance between Richmond Bridge and Buccleugh Gardens. The present use of the site is integral to that pattern and in my view the difficulties which residential development of the site would have to overcome in protecting that sense of genius loci militate against the Proposal.

The Proposal is contrary to the *Arcadia in the City* project and the Thames Landscape Strategy.

11.81. The *Arcadia in the City* project embraces planned projects and improvements along the Thames from Teddington to Richmond in a partnership between the Council, landowners and other interested organisations and requires a third of the requisite resources to be raised in the community. The Thames Landscape Strategy covers the river from Hampton to Kew and is a partnership of all relevant boroughs and other interests as well as being a partner in the *Arcadia in the City* project. The entire original Gothic house site is in the submissions made to the Heritage Lottery Fund in respect of the *Arcadia in the City* project. Detailed proposals include the improvement of pedestrian access to the river from Petersham Road and the part of the site nearest the towpath as part of the Richmond Promenade projected scheme. In my view that case would be the stronger for the inclusion of the whole of the former Gothic House curtilage.

There would be deleterious effects on wildlife and loss of trees and shrubs.

11.82. As to wildlife, 14 nesting bird species have been recorded; 18 species feed there; and 19 butterfly species have been observed. Nevertheless, a survey by the London Ecology Unit did not deem the site of sufficient importance to designate it as an Other Site of Nature Importance and in any case the portion of the Gothic site outside the Proposal could still harbour wildlife. However, I consider the two large mature trees nearest Petersham Road which visually cradle the site merit retention both for their importance in the structure of the site itself and in that of the street scene.

The site is inappropriate for housing.

11.83. Housing is opposed by the Richmond Society; Mr Padovan considers the need is for affordable housing; and others find the Proposal inconsistent with the environmental policies of the draft UDP Review and Policy X on backland and infill. In my view housing on the site need not seriously reduce the privacy enjoyed by occupiers of neighbouring houses and in principle could be in character with the neighbouring residential development, However, I consider the problem of reconciling housing on the site with public through access and tree protection makes the Proposal inappropriate.

The effect of development on traffic and parking could be unacceptable.

11.84. I observed that the A307 Petersham Road is a busy primary route with a single carriageway and footways of variable and in places quite narrow width. Development of the site would necessitate resiting of a bus stop and vehicular car parking provision would be necessary in accordance with the Council's standards or, alternatively, this could be a 'car free' development. Provided those requirements could be satisfied on engineering grounds I find no overriding objection to the Proposal on this issue. In terms of the interests of local users I am not convinced that this site provides so distinctive a public open space of quiet resort that its function cannot be fulfilled by other nearby 'pocket parks' or open spaces. I consider residential development would not overly harm the amenities enjoyed by immediate neighbours though this would be a particularly challenging site for a developer. A new pedestrian linkage between Petersham Road and the towpath would be achieved. Nevertheless, I consider the overwhelming importance of the site lies in its forming part of the necklace of pocket parks that so distinguish the locality. For that overriding reason I consider

Proposal 18 should be deleted.

RECOMMENDATION

11.85. I recommend that Proposal R18 be deleted.