
LOCAL AREAS: TWICKENHAM
Policy/Para/Proposal T01**Twickenham Riverside site; Modification ref: D/T01/2 car****park rear of 1-33 King Street****Further Modification Ref: D/T01/3****Inspector's notes**

Modification D/T1/2 introduces the possibility of a scheme of temporary uses for the site which is the subject of the Proposal. The further modification D/T1/3 amends the description of the site in the Plan text and the boundary of the site on the Twickenham Inset Proposals Map.

At the time of the inquiry an application for planning permission for temporary uses at the Twickenham Lido site, which the LPA was minded to approve as a departure from the approved (1996) UDP, had been called in by the First Secretary of State who had decided to hold a public inquiry into the proposals which should consider

- (i) Whether the proposals may raise issues which conflict with government guidance for Conservation Areas (PPG15 - *Planning and the Historic Environment*).
- (ii) Whether the proposed development would prejudice proposals for the redevelopment of the former Swimming Pool site as a whole.
- (iii) The relationship of the proposal to government policy advice in PPG15 and in particular whether the proposal would preserve or enhance the character or appearance of the Conservation Area and whether demolition should be permitted in the absence of acceptable and detailed proposals for redevelopment of the site as a whole.
- (iv) The relationship of the proposed development to policies in the UDP and the emerging UDP.

Issues

- (i) The level of commercial development should be minimised.
- (ii) The lido building should be retained.
- (iii) More precise reference should be made to conservation.
- (iv) Natural habitats should be retained and enhanced.
- (v) Important trees should be retained.
- (vi) The MOL should be protected.
- (vii) River-related uses should be specifically encouraged.
- (viii) The requirement to provide public conveniences should be restored.
- (ix) There is no need for a short term scheme.

Inspector's appraisal and conclusions

Background to the Modification of the Proposal.

11.146. The LPA explains that in view of the history of unsuccessful attempts to achieve the redevelopment of the site the Proposal is simplified compared with previous versions. The objective is to be more realistic and feasible than hitherto in policy terms by avoiding inappropriate detail, explicitly including affordable housing amongst local environmental or other improvements, and avoiding the significant cost of devising a link through to King Street. Given the time likely to be involved in achieving a suitable and viable long term scheme, the concept of a short term scheme to

urgently improve a heavily vandalised and dilapidated property is introduced. A planning brief is to be produced following the LPA's consideration of my recommendations.

The level of commercial development should be minimised.

11.147. The question of the level of commercial development in any redevelopment scheme is a major concern of objectors. I consider, however, that its relevance should be seen in relation to the history of attempts to devise a scheme for the site. Four planning applications for redevelopment of the site, together with adjoining property in some cases, have been made since 1991. The most recent of those, an application by the LPA itself, is subject to determination by the First Secretary of State after consideration of the issues identified in my note above.

11.148. In the view of the Eel Pie Island Association (EPIA) the Proposal subordinates its content to overarching financial expediency in the disposal of the site whereas the cardinal objective should be the maximising of the provision of public open space. The LPA counters that in accordance with PPG12 the Proposal should have regard to viability. The deletion of the potentially expensive breakthrough between the town centre and the Riverside is a main component of the modification D/T1/2 and is supported by EPIA.

11.149. I regard as unnecessary Mr Bell's suggestion on behalf of the Friends of Twickenham Green that the Plan should clarify that a linkage does not necessarily need to be made by means of a breakthrough from the centre of the King Street frontage. However, objection is also made that the Proposal should revert to a wider area involving part of the southern frontage of King Street. Given the apparently stable and successful nature of businesses on the south side of King Street, the heart of Twickenham's shopping centre, I am inclined to agree with the LPA that there is no justifiable reason to widen the boundary of the Proposal area as that would be likely to render its implementation excessively costly to the point of not being viable.

11.150. Though it considered a wider area it seems me that the criteria identified in the 1991 inspector's report encapsulate the qualities that should be sought of redevelopment. Expressed in terms of relevance to the current proposal site, these are broadly threefold. The site needs to be seen in the wider landscape context of the Thames; built development should not be of excessive mass and should preserve or enhance the domestic scale and character of the riverside and the Conservation Area; and it should enhance public access to the Riverside and space to enjoy the river scene. To my mind the public open space component of any scheme should be the baseline of the Proposal and should condition the scale of balancing private development needed to implement it. In such a scenario I do not consider it helpful to refer to minimal development; the question is rather to achieve an appropriate level of private development to attain these objectives.

11.151. In my view any planning brief must set certain qualitative requirements. The development must be of a quality appropriate to the Conservation Area. It must also demonstrate the special quality required of riverside development by RPG3 (1996). Policy BR19 of the draft London Plan encourages new development and facilities that increase the use of the Blue Ribbon network, the array of open water surfaces in London, for sport and leisure use. In more precisely local terms the 1994 *Thames Landscape Strategy* recommends that development of the Swimming Pool site should preserve the intimate scale and working character of the Twickenham and Eel Pie Island waterfront. It should conserve the tree-framed setting of Twickenham Riverside, possibly secure connections to the town centre, encourage a passenger boat stop, set car parking back from the river's edge and improve the layout and seating of the public spaces. I consider these desiderata, but with explicit emphasis on public open space, as I shall recommend, and severe reservations as to the feasibility of a passenger boat stop to which I refer below, should form the basis of any planning brief for the site.

The lido building should be retained.

11.152. Mr Wren makes a strong plea for the retention of the lido building, a 1930s building in type and appearance but now, as other examples of its kind elsewhere, redundant. Although its design demonstrates some details characteristic of such buildings of that period it is not recognised in a 2003 assessment by English Heritage and the Department of Culture, Media, and Sport as worthy of listing

as a building of architectural or historic interest. Indeed, I note it was described in the 1991 Inspector's Report on an inquiry into the redevelopment of the site as undistinguished. The *Thames Landscape Strategy* in my view rightly describes the building as out-of-scale with the rest of the waterfront and introducing a rather bleak dead end to the Embankment. Furthermore, its long façade cuts off the rest of its site from the Embankment and weighs against the objective of extending the Riverside ambience landward from the Embankment. I conclude that the building should not be retained in any scheme.

More precise reference should be made to conservation.

11.153. EPIA considers the 1991 Inspector's recommendations on scale and context should be observed in any scheme by the inclusion of the terms 'protect' and 'small scale'. While I appreciate the depth of the concern expressed by the EPIA I agree with the LPA, however, that 'enhance' in the justification is a more widely embracing term than 'protect' in relation to the Conservation Area bearing in mind also that the principles identified in the 1991 Inspector's Report would be a significantly material consideration in the determination of any proposal. I consequently find no reason to recommend any further modification regarding this matter, save for the deletion of reference to the *Arcadia in the City* project, which does not include the site. However, since redevelopment offers the opportunity to integrate the site more intimately with the river I see no reason why it should not be included in any revision of that project. However, as the project is not part of the UDP it is inappropriate for me to make any formal recommendation on that matter.

Natural habitats should be retained and enhanced.

11.154. A recent environmental audit of the Swimming Pool site produced for the Council and surveyed in May 2003 shows it to have the ecological value typical of a vacant or derelict site that has been abandoned for about 20 years. Its physical separation from the Thames floodplain results in there being no riparian habitats or species of note. A similarly commissioned bat and reptile survey undertaken in July 2003 identified no evidence of reptiles within the site. It recommended that provision for bat roosting and hibernation be incorporated in both long-term and short-term redevelopment of the site and that building operations have regard to the protection of birds during the nesting period. Having been commissioned in connection with the current short-term Proposal the survey report foresaw no adverse effect on any protected species. In the light of the survey findings and particularly bearing in mind the character of the habitats which have developed in the period of abandonment I find no overriding threat to wildlife which would justify the deletion or additional modification of the Proposal beyond the precautions inherent in national planning practice.

Important trees should be retained.

11.155. EPIA considers the justification should revert to the reference in the 1999 deposit Review UDP to the retention of important trees on the Embankment and service road. However, in the absence of any evidence of any special planning status of the trees I accept this would be a matter to be considered in the context of the Conservation Area as part of the landscaping content of any planning application.

The MOL should be protected.

11.156. Only a small rectangular tract of land in the eastern corner of the Proposal site is designated MOL and is part of the paved Embankment area. It appears to me that the only kind of development likely to affect this landward area would be the moorings for a pontoon, a facility included in the deposit draft of the Review but now deleted. I do not disagree that a landing stage at Twickenham would be a useful recreational facility. However, I note that such development is opposed by the Port of London Authority on the ground that in the channel between the Riverside and Eel Pie Island it would constitute an unacceptable risk to navigation. In the light of the precautionary approach I consider that an overriding objection outweighing the advantages of such a facility in spite of the fact that it need not detract unduly from the openness of the MOL.

11.157. In any event, it is obviously important that this part of site should continue to provide for access by, and parking for, vehicles servicing premises on Eel Pie Island. That is not precluded by the reference in the justification to the service road at the rear of King Street continuing to be the primary vehicular access to the Proposal site.

River-related uses should be specifically encouraged.

11.158. The EPIA refers to former river-based recreational events and advocates that the fostering of such traditional riverside activities as boating, angling, and feeding ducks be explicitly included in the justification of the Proposal. The LPA considers opportunities for angling and feeding of ducks would be enhanced by the improvement of the Embankment in the Proposal and specific reference is unnecessary. As for such activities as boating, Eel Pie Island has various boatyards, berths and slipways for both private and commercial use. A rowing and a yacht club and numerous fishing clubs are in close proximity. The provision of water-based facilities is dependent on an uncertain demand by private individuals, or voluntary or commercial bodies. In so far as such facilities are of relatively low potential monetary value they could increase the pressure for a greater volume of enabling development.

11.159. I do not share the objectors' view that the exclusion from the justification for the Proposal of the activities they identify bespeaks an attitude of opposition to them. On the contrary, in my opinion the reference to 'increased opportunities to enjoy the riverside' in the justification shows that concern to be ill-founded and I consequently find no reason to recommend amending the UDP on this account.

The requirement to provide public conveniences should be restored.

11.160. Mr Bell objects to the deletion of the reference to public conveniences in the justification for the Proposal, pointing out that there is no replacement for those now closed at Water Lane. He maintains their provision should be integral to any temporary scheme. The LPA counters with reference to extant facilities in the Civic Centre and the possibility of their being provided in such premises as cafes in any redevelopment scheme.

11.161. In my view that is not a sufficient response. While I acknowledge there can be an element of danger in the possibility of vandalism or the misuse of such public facilities for purposes for which they are not intended I consider they should be provided in a scheme which the Proposal indicates should comprise an attractive and popular place of public resort. While I believe it reasonable to expect such businesses as restaurants to provide such facilities for their clients I am not convinced that a duty to afford access by the public at large should be imposed. Furthermore, I consider it appropriate that public facilities should pass a test of accessibility at reasonable hours in relation to the character of the site. While I interpret the LPA's reference to the availability of facilities at the Civic Centre as an admission that a public facility is needed the lavatories there are only open to the public during Monday to Friday daytime office hours. Consequently, I shall recommend that the requirement for public conveniences be restored to the UDP.

There is no need for a short term scheme.

11.162. EPIA consider this provision superfluous on the grounds that the expressions 'short term' and 'pending' are of uncertain meaning and that it is possible to produce a modest scheme which would be fully consistent with the planning guidelines. While I have a degree of sympathy with the objector over the uncertainty of the modification I doubt whether the time scale for the implementation of even a modest scheme would be brief. To my mind the important matter here is that nothing should be included in a short term development which would prejudice the long term solution. In that context it seems to me of prime importance that the planning brief should establish what part of the site should be public open space and that that should be an identical requirement whatever the time scale. I shall recommend accordingly.

RECOMMENDATIONS

11.163. I recommend that the Proposal be modified by D/T1/3 and that the justification be modified by:

- (i) The restoration of the requirement to provide public conveniences;**
- (ii) The deletion of reference to the *Arcadia in the City* project;**
- (iii) More explicit emphasis on the provision of public open space as the predominant feature of any redevelopment scheme; and**
- (iv) The requirement that the planning brief for the redevelopment of the site indicate**
 - (a) the extent of the public open space to be provided, which should be immutable irrespective of the time scale of any proposals; and**
 - (b) the characteristics of the Conservation Area which justify its designation and to which new development should have regard.**

Policy/Para **T02**
College
Modification ref: D/T02/1

Richmond Adult and Community

Inspector's note

As this Proposal has been implemented it is deleted by D/T02/1 and it does not fall to me to make any recommendation.

Proposal: T04
Modification: D/T04/4

Post Office Sorting Office, London Road

Inspector's note

Because of the introduction by further modification D/T4/4 of education as a possible use of the site consideration of this Proposal is also now connected with Proposal T37 (Richmond upon Thames College).

Issues

- (i) Whether a wider range of uses than education should be defined.
- (ii) The suitability of the location for College development having regard to cost and timing.
- (iii) The Proposal disregards the site's location in relation to the Green Chain, the River Crane, and Twickenham Rough.
- (iv) The effect on the visual amenity and security of residents at Craneford Close.

Inspector's appraisal and conclusion

Whether a wider range of uses other than education should be defined.

11.164. The LPA states that the identification of educational use in D/T04/4 is a response to a specific community need in accordance with Policy CCE3 as proposed to be modified. That is challenged by the Royal Mail Group who discern no need for the change from the deposit version of the UDP Review and advocate that priority in redevelopment be given to a mix of town centre uses. They prefer reference to education as potentially part of a mix of uses of the site and that buildings of more than 2 storeys be accommodated. I refer to potential College development under Proposal T37. So far as concerns other uses I note that while public service, particularly education, and employment uses would enjoy priority consideration alternative uses are not specifically excluded.

The suitability of the location for College development having regard to cost and timing

11.165. I deal with this matter under Proposal T37.

The effect on the security and visual amenity of residents.

11.166. The curtilages of 4 dwellings at Craneford Close extend to the River Crane opposite the site. Their occupants are concerned by the possibility of close overlooking and trespass if a public footpath to London Road were established. On the other hand I find that the idea of a public path here has wide support and would provide an essential link in the Green Chain along the Crane Valley. I am satisfied that the safeguarding of a reasonable degree of privacy and security for neighbouring residents is a matter capable of being addressed in its detailed design. I consider the justification for the Proposal as amended by D/T04/4 adequately satisfies the concern about the Green Chain linkages expressed by FORCE.

RECOMMENDATION

11.167. I recommend that the UDP be modified by D/T04/4.

Proposal T08
Church Street
Modification ref: D/T08/1

Inspector's note

Proposal T8 is deleted by D/T08/1 and I therefore do not propose to make any recommendation.

Issue

An ambiguity in T7 requires replacement to take account of the deletion of Proposal T8. It should read 'Service access to premises for limited periods to be allocated by the Council'.

Inspector's appraisal and conclusion

11.168. I find no justification to reword proposal T7 consequent on the deletion of Proposal T8 save for the deletion of the 2nd sentence of the justification of the former.

RECOMMENDATION

11.169. I recommend that the 2nd sentence of T7 be deleted.

Proposal T09
Modification ref: D/PMAP/22

Waldegrave School

Issue

The Other Open Land of Townscape Importance designation should not be removed from the Waldegrave School site.

Inspector's appraisal and conclusion

11.170. Objectors consider that the removal of the OOLTI designation from the Waldegrave School site is not justified. Open space is a valuable resource used for public recreation. This approach was supported by the previous UDP Inspector.

11.171. The Council considers that the removal of the OOLTI designation of this land is justified by the need for the expansion of schools to meet educational need as set out in the Council's core proof 3, a matter I refer to in connection with Policy CCE 9. In this case the OOLTI land is entirely 'landlocked', being wholly bounded by the rear gardens of dwellings, and in my view contributes nothing to the quality of the local townscape as a whole in terms of land open to public view. While I do not deny its openness may be appreciated by the neighbouring residents it is only publicly visible in a small gap between the school buildings on Fifth Cross Road and at the service vehicle entrance in Brunswick Close. In these circumstances I am satisfied that D/PMAP/22 is appropriate.

RECOMMENDATION

Inspector's appraisal and conclusions

The site.

11.173. This 3.49 ha site is the Council's Central Depôt and accommodates a range of activities. These include a waste transfer station, parking and servicing for the Council's gritting lorries and minibuses, a meal distribution depôt, and parking for vehicles used for services contracted by the Council. The Council point out that it is not a recycling depot as such. There is a variety of utilitarian buildings including open vehicle sheds, a workshop, offices, and most notably a former sewage works pumping station dating from 1908. With the exception of the latter the buildings are largely modern and of temporary forms of construction. Much of the site consists of open hard surfaces and is used for storing vehicles and waste or other materials. In the southwestern corner of the site there is a pair of service houses. About 70 office-based staff are employed at the site and it is the reporting base for about 300 outdoor staff. My impression on inspection of the site was that it was not intensively used. Work was in hand to move the highway salt pile nearer the centre of the site and further away from the line of mature chestnut trees on the outer side of the southern boundary wall.

11.174. There is a vehicular right of way over Langhorn Road, the private access to The Stoop (Harlequins) rugby ground from the A316 Chertsey Road and a constrained vehicular access from the south through the former Mereway Allotments. There is also a pedestrian access from the east.

Loss of MOL

11.175. Objectors claim that because there would be an undue increase in the number of people using Kneller Gardens and Craneford Playing Field the MOL status of part of the site should be retained. Open areas in the south and west of the depôt site are designated MOL in the 1996 UDP. However, save for the gardens of the houses the only criterion on which the site satisfies the UDP tests of MOL status is the existence of the pump house. The LPA agrees that the pump house could be retained in any scheme for reorganising the depôt or redeveloping the site as a whole.

11.176. MOL status refers to the contribution made by a tract of land to the openness of the locality and not its use. I accept the Council's argument that there would not be excessive pressure on public open space in the locality in the event of residential development on the site. In that respect the Crane Valley Master Plan proposes improvements to Craneford playing fields and footpath links to Kneller Gardens. However, even if those are not achieved the Council's Open Space Strategy treats the establishment of a District Park consisting of Kneller Gardens and the Crane Park as a priority with a playground, park keeper, and improved pavilion. None of this would be affected by the limited area to be de-designated MOL at the depôt.

The lack of a needs assessment.

11.177. As the depôt site is neither a recreational facility nor open to the public a needs assessment is not required.

The pump house should be retained. There is no history museum, wildlife centre, or art gallery in the local neighbourhood. Funding bodies are interested in such projects.

11.178. There is considerable local concern that the former pump house dated 1908 be retained in any scheme for the site. The LPA recognises it as a Building of Townscape Merit on account of its neo-classical west front. It has recently been inspected by English Heritage but deemed not of sufficient national interest to justify listing but locally important as a reminder of the commitment of the Edwardian Twickenham Urban District Council to the social importance of efficient waste disposal.

11.191. While I acknowledge the attraction of using the pump house for the indoor activities suggested they could only in practice take place if the building were outside a reduced depôt area inaccessible to the public. However, I heard no firm evidence of financial support external to the Council for any of the indoor activities suggested. At the same time it appears to me that any of them would depend on a greater residential catchment area than the immediate locality. Since Twickenham as a whole is well provided with them and the Crane Park local nature reserve is within a reasonable distance any case

for Council funding would seem very doubtful. On the other hand I consider its historic significance and the quality of its western façade merit its retention.

The effect of the proposed development.

(a) The environmental and ecological impact of development.

11.180. On account of its hard surface the site at present has no ecological value. Hence it does not partake of the predominant character of the Crane Valley Green Corridor. Total redevelopment would create some nature conservation value so far as that would be likely to evolve in a residential environment and would allow improvement of the green corridor alongside the Duke of Northumberland's River. However, in the LPA's view that would be dependent on relocating the depôt to the Richmond upon Thames College playing field alongside the A316. In considering the future of the playing field I conclude in relation to the development of the College (Proposal T37) that the latter is a preferable use. Nevertheless, if only the eastern part of the depôt site were used for housing there could be a modest gain to the natural environment in the gardens and incidental open spaces.

(b) There is a potential flood risk.

11.181. On this issue I have assumed for the reason above that only the eastern part of the site would be developed. The site is within the surface water run-off control area defined by the Environment Agency and subject to Policy ENV34. The significance of the Policy is that additional surface water run-off from new development creating impermeable surfaces could exacerbate flood risk downstream. Any development would require a Flood Risk Assessment which was not agreed between the Council's technical consultants, Peter Brett Associates, and the Environment Agency by the end of the inquiry notwithstanding that the consultants' Flood Risk Assessment Plan submitted to the Environment Agency, who had requested a comprehensive FRA for the Crane Valley Master Plan area, shows the site to be wholly free of flood risk. In the circumstances I consider that the precautionary principle should prevail in support of Proposal T18.

(c) Traffic and associated impacts.

11.182. A detailed assessment of traffic generation would be made in the examination of a planning application. However, I find that the assumptions inherent in the modelling by the LPA's highway consultants of peak hour traffic flow generated by residential development in Options 1 and 2 of the Crane Valley Master Plan do not indicate such a volume of vehicular movement as to justify the rejection of residential development of the eastern part of the site.

(d) The site should become a park to compensate for the residential development of the former Mereway allotments. Its proximity to the River Crane and Duke of Northumberland's River makes it an appropriate site for a public garden.

11.183. As I recommend no change in the MOL status of the former Mereway allotments the question of alternative open space provision does not arise. In any case there is no overall shortage of open spaces in the locality. While I recognise the merits of improving the environment of the rivers that is necessarily constrained by funding problems which the LPA considers cannot be solved without the disposal of land for residential development, a matter I consider generally in relation to Policy D/ENV/X River Crane Area of Opportunity.

(e) Existing neighbours would be adversely affected; there are already too many people in the area; there is a shortage of places at nearby schools; and residential amenity would suffer.

11.184. The Council refers to its duty to provide for housing need under national and regional policy. The scale of the gap between need and supply in London as a whole requires the maximum reasonable provision of housing in general and affordable housing in particular. The depôt site would rank as brownfield and hence be a priority for redevelopment for housing in terms of the national guidance in PPG3. Nevertheless, that does not imply overriding all other considerations. In this case if the depôt cannot be re-sited en bloc but could be restructured to yield some surplus land I consider it reasonable

that the surplus land be devoted to housing, provided that the retained depôt activities were not unacceptably inimical to a residential environment.

11.185. I find no informed ground to challenge the Council's evidence that infrastructural provision in this part of Twickenham is not under stress.

11.186. Detailed effects on residential amenity are a matter for examination in the event of planning permission being sought. However, if the eastern part of the depôt site were developed there is no existing housing sufficiently close by to justify objection on this issue. 12 dwellings at Rosecroft Gardens on the west side of the Duke of Northumberland's River are within about 30m of the western boundary of the depot. I consider that the internal reorganisation of depôt activities could probably mitigate further any risk of loss of amenity.

Summary

11.187. As I conclude on Proposal T37 below, I consider the depôt should not move to the College playing field, but should remain on its existing site and be reduced in area by a reorganisation of the activities which currently take place there. The LPA should define a tract of land within its eastern boundary that should be allocated for housing. The pump house should be retained with a view to exploring the feasibility of its use as a community facility. The MOL designation should be removed from the site, save that it should be retained over the area of Mereway Cottages and their gardens.

RECOMMENDATIONS

11.188. I recommend that the UDP be modified by D/T18/1 as further modified by D/T18/2 and subject to the following considerations:

- (i) That Mereway Cottages and their gardens remain designated MOL;**
- (ii) That the pump house on the depôt site be retained in any reorganisation;**
- (iii) That in any reorganisation of uses on the the site any land in its western part released as public open space adjoining the Duke of Northumberland River should remain designated MOL.**

Propoal	T26
Twickenham Rail Loop	
Modification ref:	D/T26/1
Further modification ref:	D/T26/2
Further modification ref:	D/T26/3

Inspector's note

This proposal is deleted by D/T26/3 in view of the lack of support for the development from the Strategic Rail Authority. Its deletion rules out the possibility of directly enabling through running of trains from the Teddington loop tracks to the 'Windsor' lines west of Twickenham station which would have eased access to Heathrow passengers from the loop by eliminating the need to change trains at Twickenham. Nevertheless, the Council has resolved to add a note on the subject, which I consider below, to paragraph 7.66 of the UDP.

Inspector's appraisal and conclusion

11,189. Twickenham station consists of 2 island platforms used by Teddington loop trains and those on

the 'Windsor' lines respectively. Interchange is made difficult by the necessity to change platforms via the pedestrian footbridge where the stairs are equipped with single disabled person's staircase chair lifts only. It appears to me that the solution of cross-platform interchange would require substantial track layout changes. Although there is no clear prospect of their being achieved I support the aspiration inherent in the Council's addendum to paragraph 7.66. The reference to the flyover at (a) in paragraph 7.64 is not challenged and is not therefore before me. It is clearly anomalous and a matter which the Council will need to address.

RECOMMENDATION

11.190. I recommend that:

- (i) **Proposal T26 be deleted in accordance with D/T26/3.**
- (ii) **The following be added to the text of paragraph 7.66 of the UDP Review:**

'The omission of the proposal in the adopted UDP for a rail loop (to link the Waterloo-Reading line to the Teddington loop line) means that priority should be given to Twickenham as an interchange station in terms of facilities and service timings, to provide good links with stations to and beyond Kingston. These improvements should not prejudice redevelopment of the Post Office sorting office site (Proposal T4).'

Proposal T29
Twickenham
Modification ref: X/T29/1

Brunel University,

Issue

The Borough has lost recreational space to housing especially along the Thames. Open spaces should be protected.

Inspector's appraisal and conclusion

11.191. This Proposal is to rename proposal T28 as T29 to correct an error in the labelling of the Proposals Map. The objection appears to have been misdirected and appears to refer to the redevelopment of the site which I deal with under Policy ENV18 and D/PMAP/30.

RECOMMENDATION

11.192. I recommend that the UDP be modified by X/T29/1.

Proposal T33
School: use of
Modification ref: D/T33/4

Orleans Park
playground out of school hours

Inspector's note

This Proposal does not remove MOL status but updates the situation. As the Proposal has been implemented it does not fall to me to make any recommendation.

T34

Former Mereway Allotments:

Housing/Education

Modifications ref: D/T34/1
D/PMAP/06

Further modification: D/T34/4

Inspector's note

The original Proposal T34 included the possibility of the building of a new secondary school on the site. That element is removed by the further modification D/T34/4.

Issues

- (i) Loss of MOL.
- (ii) Loss of recreational facility or potential allotments.
- (iii) Inappropriate development of the site.
- (iv) Dual use of Kneller Gardens.
- (v) Impact on the natural environment.
- (vi) Traffic implications of development.
- (vii) Flood risk.
- (viii) The effect on residents of Gould Road.
- (ix) Other impacts on the area.

Inspector's appraisal and conclusion

Loss of MOL.

11.193. Representations object to the loss of MOL on principle; that its removal is contrary to draft London Plan and UDP policy; that its disposal would set an undesirable precedent; and that the removal of MOL status implies the sale of the site to developers.

11.194. The site has been neglected since it ceased to be used as allotments in 1991 and has become overgrown, predominantly with a dense cover of brambles. It abuts the River Crane to its south and the Windsor line railway to the north, the latter being part of the West London Green Chain. The LPA concedes that it fulfills 4 of the 6 criteria defined in paragraph 5.25 of the UDP but does not contain natural features worthy of protection on account of their value either nationally, to the London metropolis, or locally, nor does it afford open air facilities of a similar rank of significance. In my view, however, this is an important MOL site in view of its forming part of the succession of open spaces in this part of the Crane Valley that march with the Green Chain alongside the railway. Though the Crane Valley Plan shows the retention of MOL around the proposed housing area I consider that would so reduce it to an exiguous residual tract as to negate the objective of the designation.

11.195. I do not attach weight to the issue of precedent. The de-designation of any tract of MOL is a matter which should be examined individually on its merits in the light of Policy ENV1 of the UDP and Para 3D.48 of the draft London Plan.

Loss of recreational facility or potential allotments.

11.196. The site is not public open space in any formally dedicated sense nor is it a place of active recreation. Indeed, in my view there is no obvious reason why it should be so, given the proximity of Craneford west playing field and Kneller Gardens. As to the resumption of allotment use, the August 2003 analysis of demand for allotments shows only 5 extant applications for plots at Marsh Farm, the nearest allotment site. I conclude that neither ground of objection merits such weight as to prevent development of the site.

11.197. While this is not a conventional public open space there is nevertheless no barrier to public access off the roadway save the virtually impenetrable nature of much of the vegetation. Its primary, and predominant, function is clearly a short routeway affording access by cyclists and pedestrians to

places outside the site and views to residents on the south side of the river. Indeed, even the walker will traverse the space in a very short time. There is no local deficiency of playing field space and objectors agree it is unsuitable for that use. Nevertheless, in comparison with anywhere else in its immediate vicinity this is the only tract of truly wild land through which the public may pass. Small as the site is, it nevertheless provides a welcome visual open interlude within the built up area, an ambience which would be lost were it to become primarily a residential area with the remaining open space obviously subsidiary to the proposed new housing.

Inappropriate development of the site.

11.198. Objections to a school on the site are overtaken by the further modification deleting that element of the Proposal. The indicative Options 1 and 2 in the Crane Valley Master Plan devote the site predominantly to 'green roof' housing. In my view that is not an acceptable substitute for the current scene. Even if the housing were roofed in natural materials this would clearly be a developed residential site retaining only in its northern part on the indicative plans an exiguous extent of non-domestic land. The sensation of passing through a small relatively wild tract of land, notwithstanding the provision of seats and minor street type lighting, would be lost at the point where the succession of open spaces through the Crane Valley in the locality is at its narrowest. I consider such development utterly inimical to the atmosphere of the natural world which the scheme should seek to foster at this site.

Dual use of Kneller Gardens.

11.199 Objections to the dual use of Kneller Gardens are allied to the school proposal but in view of the deletion of the latter no issue arises on this matter.

Impact on the natural environment.

11.200. To the average casual observer the former allotments appear for the most part to have become overwhelmingly invaded by an impenetrable growth of brambles, docks, and nettles. A Greater London Ecology Unit survey in 1999 defined the site as scrub (c60%), neutral grassland (c30%), and scattered trees (c10%). Though considered a valuable area of relatively undisturbed scrub and grassland its species richness was described as 'poor/average' and the site was not recommended for designation as a Site of Metropolitan Importance. On the other hand I note that the report of Waterman Consultants, commissioned by the Council in July 2003 to reassess the site as background to the formulation of the indicative proposals in the Crane Valley Master Plan, recognises the symbiotic nature of plant and animal life there. It cites invertebrates, small mammals, foxes, flower, berry, and seed-eating birds, birds of prey, and bats as likely to become displaced in the event of housing development. As a relatively newly-formed habitat the site was described as neither natural nor difficult to re-create. The retention of some areas of rough vegetation, not necessarily in the same place as at present, was recommended as was the provision of some compensatory area of rough grassland.

11.201. Objectors, however, drew attention to the potential detriment they consider development could bring to the green corridor along the Crane Valley and the biodiversity of the plant and animal life of the site. On the basis of their detailed observations of the site's flora and fauna they claim that the site has considerable merit as one of nature conservation interest and that it could be a valuable educational resource. Given that in the botanically fascinating 13 year period of re-naturalisation since the abandonment of the allotments it appears to have stimulated no such interest I accord this consideration limited weight. I also bear in mind the potential conflict between nature conservation and more penetrative public access and use. I nevertheless consider there is merit in cooperation between the LPA and the local community in making the nature conservation interest of the site better known and accommodated to make it worthy of interest in its own right rather than being a brief interlude of undeveloped land on an urban pedestrian and cycle routeway and I shall recommend accordingly.

Traffic implications of development.

11.202. I discern no justifiable reason to challenge the LPA's traffic consultants' view that, related to peak hour traffic flows, the volume of traffic generated by the indicated 24 dwellings would lead to unacceptable traffic flows in neighbouring local roads. However, I hold this of slight significance when weighed against the strength of the grounds of loss of MOL, the potential effect on the natural environment, and the inappropriateness of residential development.

Flood risk.

11.203. Part of the Mereway site falls within the boundary of the area defined by the Environment Agency as subject to flooding. It is shown on the Proposals map within the surface water run-off control subject to Policy ENV34. The significance of that Policy is not only that the area is itself subject to flooding in the 100 year return flood area but that additional surface water run-off from new development creating impermeable surfaces could exacerbate flood risk downstream. Any development would require a formal Flood Risk Assessment. Given the relation between the Proposal sites in the Crane Valley Master Plan area such an assessment was required by the EA for the whole of that area. The assessment prepared by the Council's technical consultants, Peter Brett Associates, showing a lesser proportion of the site at risk had not been agreed by the Environment Agency by the end of the inquiry.

11.204. So far as concerns any upstream flood incursion the area is protected by the Thames Barrier and other flood defences. On the other hand, objectors fear that properties on the site could be at risk from surcharging of the river by downstream flows resulting from exceptional meteorological events. In that context the consultants' map shows 2 areas subject to flood risk, one of which extends from the river across the trackway and under the railway bridge. If that map proved acceptable to the Environment Agency a radical review of the indicative housing layout would be required. However, while I attach some weight to the risk of flooding as a constraint on the development of the site I regard it a subsidiary to the principal objections I cite above.

The effect on residents of Gould Road.

11.205. Save for the pair of houses at Mereway Cottages, it is only from the rear of a small number of houses on the north side of Gould Road that the Mereway site is visible from residential property. As I observed, from the gardens of these houses and dependent to some extent on the season the view extends over the site to the Windsor line railway and beyond. However, as PPG1 explains, planning operates in the public interest and does not exist to protect solely private views. These rear gardens are of ample depth and are not accessible by anyone other than householders. While the range of currently open private views over Mereway would be foreshortened, any dwellings there would, in terms of the standards conventionally applied, be at sufficient distance as to retain reasonable privacy for Gould Road residents.

Other impacts on the area.

11.206. It is alleged that the Council has deliberately ignored vandalism of the site in order to describe it as wasteland. I find the charge fanciful and give it no credence.

Summary.

11.207. The overall question is whether the Proposal reflects such compelling special circumstances as to outweigh the MOL designation. The LPA claims the Proposal would bring an overall benefit, contributing to the overall housing need in London identified in the draft London Plan and to affordable housing in line with UDP policies. The Green Chain would be retained and nature conservation on the site could be enhanced. Amendment of the Crane Valley Master Plan could take account of the Council's consultants' more sophisticated flood risk assessment. Pedestrian and cycling routes would be improved and riverside open space be provided. Contrary to objectors' assertions that there is no

security problem, concerns have been expressed on this and a domestic environment would be inherently safer than fully open land. In total the LPA sees the Propossal as justifying the loss of MOL by satisfying the exceptional circumstances required to justify the change in the interest of improving open spaces in the Borough as a whole.

11.208. I note that the site fulfills a substantial proportion of the MOL criteria. While it is not worthy in its own right to specific designation as a nature conservation site it is nevertheless part of the important linked array of sites that march with the Green Chain and the proposal for improving the River Crane itself, from Kneller Gardens and the Duke of Northumberland's River in the west to the Post Office site in the east. De-designation and development would severely reduce the area of only truly wild land across which the public can pass in the locality. In my view residential development here would be profoundly contrary to the objectives of the Crane Valley Area of Opportunity policy as a whole. I conclude that the site should not be de-designated from MOL status.

RECOMMENDATION

11.209. I recommend that the UDP be not modified by Proposal T34 but negotiations be initiated between the Council and interested bodies and persons regarding the enhancement and management of the site as part of the Green Corridor along the Crane Valley.

Proposal	T35	
Harlequins Rugby Ground:		
Modification Refs	D/T35/1	continued use
	D/PMAP/09	
Further modification refs:	D/T35/2	
	D/PMAP/35	

Inspector's note

The Proposal was amended before the inquiry by D/T35/2 to read:

‘Continued use a sports ground with associated facilities, enabling development, new access road’

and the justification to read

‘Consolidation of existing use, improvements to facilities, taking into account effect on nearby residents. Enabling development, and new access road from A316 to serve new residential development.’

D/PMAP/35 amends D/PMAP/09 to show the remnant area of the practice pitch as OOLTI.

Issues

- (i) The justification for the removal of the MOL designation.
- (ii) The need for playing field space.
- (iii) The lack of a needs assessment in accordance with PPG17.
- (iv) The traffic impact of the proposed residential development.
- (v) The impact on such protected wildlife as bats.
- (vi) Liability to flooding.

Inspector's appraisal and conclusions

The site.

11.210. The entire 5.9 ha Harlequins site has a large east stand, the original west stand and smaller demountable stands to the north and south of the pitch. The site is one of the smallest in Zurich Premier Rugby and is the only Premier club in London. The club's local following includes FORCE who support its aspiration to modernise and retain its Premier Rugby status. The club aspires to increase its spectator capacity by erecting a new west stand which would allow a wider margin between the building and the Duke of Northumberland's River.

The justification for the removal of the MOL designation.

11.211. Much of the Harlequins site as a whole is developed and rates poorly in terms of the UDP criteria for MOL status. The MOL designation is misleading and I consider its excision is clearly logical. Nevertheless, its western flank is part of the setting of the Duke of Northumberland's River that is itself within the MOL and is flanked by only a narrow path which, notwithstanding its bordering housing on its west side, has an air of remoteness. To that extent I consider that in the redevelopment of Harlequins west stand the MOL designation should remain applicable to the area between the stadium and the Duke of Northumberland's River.

11.212. The 0.7 ha open practice area east of the stadium and south of the health club building and open parking is more contentious. It is principally used for coaching, for mini rugby, and for a variety of social functions. RPG3 expects MOL to have wider strategic significance than the Borough and cautions against dilution of the concept by designating land which does not fulfil this purpose. I am inclined to agree with the club and the LPA that this tract of land does not satisfy that requirement and that together with the stadium and car parking areas it should be de-designated from MOL status. On the other hand I support the LPA's proposal to protect the openness of that part of the practice area which would remain by designating it as OOLTI.

The need for playing field space.

11.213. So far as concerns loss of playing space there is no general shortfall of public playing fields in the locality. The club considers the proposed undeveloped residual area of the practice pitch sufficient for its needs. Residential development of the periphery of the practice area as shown in the indicative Scenarios 1 and 2 of the Crane Valley Master Plan would support the cost of the club's west stand redevelopment proposals and enable enhancement of the setting of the Duke of Northumberland's River. The indicative proposals for the playing pitch site show 56 dwellings. FORCE's objection rests on whether the development is needed and the scale of its impact. I consider the direct relation of the proposal to the Club's needs is justifiable in the interest of an organisation recognised as a local asset. In relation to the second proviso FORCE concurs that the impact of the development would be modest. Indeed, there is no public playing field deficiency in the locality which could specifically be met by the strip of the practice area proposed for residential development.

The lack of a needs assessment in accordance with PPG17.

11.214. Harlequins site is not land open to public use, hence no needs assessment in terms of the requirements in paragraph 10 of PPG17 is necessary in the event of an application for planning permission for development coming forward. Further, though some objectors argue otherwise, clearly no public open space would be lost. The remaining part of the practice ground is adequate for Harlequins' needs and in any case is to be defined as OOLTI.

The traffic impact of the proposed development.

11.215. Current vehicular access to the site is via Harlequins's private Langhorn Road. The Master Plan envisages, and the Council's highway evidence confirms, that development on this site could feed to a signal-controlled junction with the A316 Chertsey Road. While I support that conclusion I have a degree of reservation; the A316 is the principal exit from Central London to the M3 and any additional junction, of which there are few in the Borough, would require the support of TfL. Furthermore, the LPA's consultant assumed the relocation of Cranford Dépôt whereas I do not support that under Proposal T18. Nevertheless, it cannot be assumed from TfL's representations that a new junction would not be allowed, given that the methods of traffic forecasting for this site are the same as used for the Rugby Football Union development on the north side of the A316 in the close vicinity. Ultimately the matter would fall to be tested by a planning application.

11.216. Peak hour flows from the development are estimated to be low and have but slight impact on the traffic volumes on Whitton Road and the A316. Residents fear that housing on the Harlequins site would result in rat-running traffic from Whitton Road to the A316 through the Heatham estate, a manoeuvre currently prevented by the blocking off of the Egerton Road/A316 junction. While I regard the objectors' concern as a real one nevertheless it is clear that there is a range of traffic management measures which could be employed to effectively make such intrusive vehicle movements unattractive and avoid overloading the indicative A316 junction.

11.217. Richmond upon Thames College objects to its citation in the LPA's further but not formally deposited proposed addition to the justification as a potential user of a new access road from the A316 to serve new residential or educational development on the rugby club land. However, the housing development is the primary motivation for a new road. In relation to the further modification agreed for the College site Proposal T37 it is incorrect to assume that any development on the College site would be required to be accessed via the new road or Langhorn Drive. The College policy expressly

states that access is a matter for detailed consideration when an application for planning permission arises.

The impact on such protected wildlife as bats.

11.218. There is no evidence of the site having any significance for wildlife protection or ecology which would weigh against its development.

Liability to flooding.

11.219. Development would take place on the north side of the practice pitch and would be well clear of the 100 year return flood boundary notified by the Environment Agency. As it appears to me that the Environment Agency would have no sustainable ground on which to object to development I find no maintainable objection to the Proposal on the flood liability issue.

RECOMMENDATION

11.220. I recommend that the UDP be modified by Modification D/T35/2 and D/PMAP/35.

Proposal:	T36	Twickenham Rifle Club
Modification refs:	D/T36/1 D/PMAP/07 D/PMAP/08	

Inspector's note

The original modification D/T36/1 is further proposed to be modified by D/T36/2 amending the purpose of the modification to 'housing development to include improvements to banks of the River Crane and enhancements to open space corridor'.

Issues

- (i) Loss of MOL.
- (ii) Current visual impact of the site.
- (iii) Nature conservation value of the site.
- (iv) Loss of a recreational facility.
- (v) Impact on the Rifle Club.
- (vi) The site should not developed as housing.
- (vii) Traffic implications.
- (viii) Liability to flooding.

Inspector's appraisal and conclusion

Loss of MOL.

11.221. It seems me to that the proposal to dispose of the site is motivated by a perception of it as largely untended waste ground, as is similarly the case with the former Mereway allotments site. Seen from the passing train the site is an eyesore requiring strenuous efforts to remedy its unkempt and neglected appearance. In general it appears abandoned rather than a tract of the wild in an urban area. In the circumstances I find the implicatrion of the LPA's Proposal that its openness is of little merit

understandable. However, I consider that interpretation, based on its current appearance, ignores its function as an open space by unreasonably disregarding the relation of the site as MOL to the open space corridor following the Green Chain alongside the railway and the corridor adjoining the River Crane. While it is not nominally part of the Crane Valley Green Chain, which here follows the railway line, it is an integral component of the succession of open sites adjoining the Green Chain in this part of the valley. In my view that is its overriding function which justifies its retention as MOL.

Current visual impact of the site.

11.222. So far as it is visible to the public either from the neighbouring Craneford Playing Field West or from the railway the appearance of the site bespeaks neglect. Much of its open area is largely neglected, the outdoor butts are liberally daubed with graffiti, though while the buildings are of a poor standard and condition statutory security against unauthorised entry is assiduously maintained. In my view a relatively short lease does not encourage either improvement or a high standard of maintenance. It appears to me that through its overall long period of occupation the Rifle Club has clearly little sought to become involved in the maintenance of the appearance of the site.

Nature conservation value of the site

11.223. To the casual observer from the neighbouring public open space or from the train the site appears to consist of rank grassland with only a relatively tidier area in the centre of the site mown annually by the rifle club consistent with the club's requirements. The club buildings housing the indoor ranges are of poor construction and needing maintenance. Like the outdoor butts they are liberally decorated with graffiti. In the Borough-wide survey carried out by the London Ecology Unit in 1999 the site was not identified as of sufficient importance as to merit designation as an OSNI. On the other hand, objectors claim that the development of the site as proposed would adversely affect the wildlife, ecology and biological diversity of the Crane Valley corridor; it is a classically rich urban wildlife site; and it adjoins the open railway land known as Twickenham Rough and also the nearby allotments.

11.224. A nature conservation survey by Waterman Environmental commissioned by the Council in July 2003 in connection with the formulation of the Crane Valley Master Plan described the area as a grass-dominated community with few wildflowers but concluded that it may act as a reservoir for wildlife. The report recommended the retention of some areas of rough vegetation to maintain the biodiversity of the river corridor though they need not necessarily be in the same place as at present.

11.225. I conclude that if the site is not to be developed but to become subject to public access it will be for the LPA to establish in consultation with relevant interests the extent to which that is compatible with any interest in the natural environment deemed worthy of conservation.

Loss of a recreational facility.

11.226. The site is leased to Twickenham Rifle Club. I deal below with the impact on the club's activities. Although not open to the public the area is clearly subject to trespass as is evidenced by the graffiti on the buildings and butts. As no public facility would be lost I find no strong ground on this issue to reject the Proposal.

Impact on the Rifle Club.

11.227. The Club has used the site since 1903. It claims its facilities are well used by its current 40 members and such others as the Scouts and that there is no comparable organisation in this part of London. Its annual rent was increased from £70 p.a. to £4,500 p.p. when the lease was renewed in 1998. It runs to 23 June 2008 and any premature curtailment would entitle the Club to the tenant's right of compensation. Though they do not for the most part provide directly comparable facilities the LPA points out that there are other clubs in the Borough at Twickenham, and Ham and Petersham, and there are also ranges at Kingston upon Thames, Walton upon Thames, Feltham, Heston, and Staines.

11.228. This type of activity is not specifically local but potentially footloose. Moreover, in spite of

the specialisation in types of gun use referred to by the Club as a reason to deter movement in membership between clubs with different types of activity, the tighter legal control of the exercise of particular gun skills can clearly affect clubs' adherents and their preferences for particular branches of the sport. The sport also requires a high degree of security. In the circumstances I do not consider that proposals for generally improving the Crane Valley in the public interest and especially particularly to enhance public access should be impeded by the retention of this activity unless a good standard of security in the open area is achievable. I am in no doubt that if the aspirations for the Crane Valley as a linear open space are to be achieved there is an acute need for improvement of the Rifle Club site and any part it should play in particular in providing a through pedestrian/cycle route along the valley. I consider that should be explored by the Council, the club, and the local community jointly and I shall recommend accordingly.

The site should not be developed as housing.

11.229. Contrary to the LPA's assertion, the potential of a housing development to obscure the southward view of a nondescript range of industrial buildings across the river, including the equipment of a substantial outdoor electricity substation, is not considered by objectors to justify such development. Although the proceeds of the disposal of the land for housing development are fundamental to the implementation of the Council's programme for improving public open spaces in the Borough generally I hold that of less significance in the case of this land than protecting its MOL status. In my view that consideration merits more weight than any screening of the unremarkable land uses south of the river.

Traffic implications.

11.230. The current access to the site is by means of a single vehicle width hard surfaced track. I am satisfied that it could be widened sufficiently to afford adequate access to the scale of development indicated in the Master Plan. So far as concerns the linkage to the principal traffic routes at Whitton Road and Chertsey Road I heard no technical evidence to contradict the LPA's highway evidence that the likely volume of peak hour traffic generated by the site would not cause difficulty at the putative new access to the A316 to the north or could not be accommodated by means of appropriate traffic measures in the Heatham Estate area. However, if, as I recommend, the site be retained as MOL residential traffic generation is not an issue.

Liability to flooding.

11.231. The site is within the indicative flood plain delineated by the Environment Agency and much of its western part lies within the EA's 100 year return flood liability line. The LPA draws attention to the protection of the Borough by the Thames Barrier and other flood defences. Any specific proposal for development would be subject to a formal Flood Risk Assessment as required by PPG25 as a basis for devising any requisite flood mitigation measures. A comprehensive FRA for the Crane Valley Master Plan area, required by the EA and submitted to them by the Council's technical consultants, Peter Brett Associates, shows the site to be wholly free of the 100 year return flood risk. However, that line was not agreed by the EA by the end of the inquiry. In the circumstances, I attach little importance to this issue as I consider it overridden by the strength of the argument for the site to remain MOL.

RECOMMENDATION

11.232. I recommend that the UDP be not modified by D/T36/1 but that reference to the site be replaced by the following:

'Proposal T36 Twickenham Rifle Club Improvements to banks of River Crane and provision of a through pedestrian/cycle route.'

Justification

‘Improvements to the banks of the River Crane to enhance their ecological interest and the provision of a public pedestrian/cycle route along the valley to be devised in consultation with the Rifle Club and the local community.’

Policy/proposal ENV1 T37

Richmond upon Thames College

**Modification refs: D/T37/1 , D/T37/2, D/T37/3, D/T37/4
D/PMAP/11, D/PMAP/37, D/P/MAP/34**

Issues

- (i) The need for the redevelopment of the College.
- (ii) Loss of MOL and playing field.
- (iii) The feasibility of relocating the College to its playing field site south of the A316.
- (iv) The feasibility of relocating the College to the Post Office site (Proposal T4).
- (v) The effect on residential amenity.
- (vi) The traffic implications of the development.

Inspector's appraisal and conclusions

The need for the redevelopment of the College.

11.233. The College is an important institution in the higher and further education sector, having 4,000 full-time and 1,500 part-time students and 650 full-time and flexible-contract staff, together with about 150 part-time staff. It has a federal structure consisting of a sixth form for the 14-19 age group following academic and vocational courses, a Continuing and Further Education Centre including teacher training, National Certificate and Higher National Diploma courses and the new Foundation degrees, and an expanding Skills Centre offering training in the majority of occupational areas. It also accommodates short courses for continuing professional and technical education.

11.234. The range of College activity reflects the developing pattern of national needs and those of the Borough, though the institution attracts students from a very wide area. Although the federal structure is successful there is an urgent need to provide accommodation more appropriate to the 3 ranges of students.

11.235. On the existing site there is a jumble of buildings. The original 1930s technical college building fronts Egerton Road. To it there has been added in the postwar era a variety of buildings of unrelated design, some of which are nearing the end of their useful life. The College seeks to replace these with accommodation which would be flexible in its internal arrangement, able to cater for a range and variation of class sizes, and suitable for current and future teaching systems, including the growing use of information technology. Unlike the existing buildings, all new accommodation would have to afford full accessibility to provide equality of opportunity of educational provision irrespective of disability. Efficiency in the use of buildings currently also suffers from inadequate provision for library, social areas, and quiet study areas. A new building would allow such provision, including internal circulation patterns, to be more efficient. The local community would be afforded the use of such facilities as a video studio, art and design rooms, theatre, and music centres.

11.236. Preparatory work has been carried out in partnership with the Council, Harlequins Rugby Football Club and other sports organisations with a view to the redesign of the College's Craneford Way playing field. This is currently on hold pending the further development of the College's

accommodation strategy.

11.237. The College requires 32,000 m² of floorspace distributed to reflect the 3 elements of its tertiary provision. The nature and layout of the existing buildings prevent this on the present site. Nor, for educational reasons and bearing in mind the particular needs of the 14-19 age group of students, can it be achieved in a multi-storey building.

Loss of MOL and playing field.

11.238. Having explored with property advisers and planning consultants the possibility of relocation elsewhere the College considers the current College playing field south of the A316 is the only feasible option for the location of Phase 1 of redevelopment.. The existing college site would become available for enabling development in Phase 2 of the redevelopment. The LPA, however, prefers the allocation of the Post Office site (T4) as an alternative option, a matter I consider separately below.

11.239. There is no dispute between the College and the LPA that the playing field site does not merit designation as MOL. It scores very poorly against the UDP criteria. It is modest in size, is neighboured by built development save where it faces the A316, and is unrelated to other open space. Its recreational value is that of a private facility which lacks metropolitan significance. So far as concerns the approach to London on the A316, a prime London radial route, the line of mature trees and wide verge between the site and the road would be unaffected.

11.240. Objectors point out that, other than the RFU and Harlequins stadia, this is the only rugby football field in the area. However, as a College facility it could be replaced by the upgrading of Cranford Way East playing field.

The feasibility of relocating the College to its playing field site south of the A316

11.241. I agree with the College's view that contrary to the aims of the UDP, the citing of either College or dépôt as alternative forms of development on the A316 land DT37/3 fosters uncertainty. In my view that is made more acute by the difference between these forms of development. Though its first preference for the College redevelopment is the Post office Site (T4) the LPA agrees that the site by the A316 is a suitable one. However, it also argues that the relocation of the Central Dépôt to the A316 playing field would be environmentally satisfactory. In the opinion of the College the alternative development, the relocated dépôt, would consist of an agglomeration of utilitarian sheds with open storage and parking. The LPA asserts that an office block consolidating the housing of the office functions now accommodated at the existing dépôt could screen the site. I am inclined to view that use, notwithstanding its including an office building facing the A316, as wholly inappropriate in such a prominent position on a main radial route entering London compared with its present low key location. Furthermore, on account of the inclusion of waste transfer facilities, albeit possibly covered, I consider it would also in my view be inappropriately close to residential property on Egerton Road.

The feasibility of relocating the College to the Post Office site (Proposal T4).

11.242. The existing 1960s building on the Post Office site formerly housed both inward and outward mail handling facilities. Outward mail handling was transferred to a new site at Feltham in 2002 and the building is consequently not fully utilised. The Royal Mail Group has not yet found a suitable alternative site for the inward local mail distribution function.

11.243. It is common ground that the Post Office site has better access to rail and bus transport than the present Richmond upon Thames College buildings and that it is a prominent 'gateway' in the townscape at the edge of Twickenham town centre. Its potential prestigiousness is not disputed. If disposed of, it would be likely to command a high value which would increase the cost of the College redevelopment, offsetting any receipts from the disposal of the College's existing site. However, the Post Office currently has no plans to dispose of the site and its acquisition would therefore be subject to delay. In any case it appears to me that any scheme for the redevelopment of the Post Office site would need to have regard to its location in relation to the Green Chain, the River Crane, and Twickenham Rough,

11.244. As the College points out, before redevelopment could proceed on the Post Office site the postal authority would have to find an alternative one; it would have to resolve to dispose of the site; and the College would have to obtain planning permission and funding. However, the Learning and Skills Council's funding régime is time-limited. The LPA does not challenge the imperative that the College must seek planning permission and funding in 2004. I agree that clearly rules out the Post Office site.

11.245. An indicative layout design produced by consultants for the Council essays a way of accommodating 32,000m² of floor space on the Post Office site. In particular, it incorporates an excessively long plinth about 220m long and about 45 m deep. It would not allow flexibility in use in response to changing demands and would pose problems of access, natural lighting, and ventilation. The plans show it would oversail 3rd party land and would require substantial accommodation for plant and for lifts in the unsuitable high rise blocks. At ground level, pedestrians would mingle unsatisfactorily with vehicular traffic; pedestrian access would be through the car park; and there would be a lack of foyer space at the entrance.

11.246. Consultants for the College were unable to devise a workable scheme for College use of the Post Office site. Neither the site nor its location are agreed as satisfactory by the College authorities for the total relocation of the institution. In both type and flexibility it fails to satisfy the requirements of the Learning and Skills Council. The LPA raises the possibility of one arm of the College moving to the Post Office site. However, it appears to me that such a locational split in the College's functions would militate against the economy of scale and efficiency in the location of all of its indoor activities on a single site. While I consider these considerations weigh conclusively against development by the College as its unified site, I accord even greater weight the fact that a design on these principles would be unacceptable to the Learning and Skills Council, the primary funding body. Nevertheless, I do not propose to recommend excision of the reference to education in this Proposal in recognition that circumstances might evolve to make necessary the accommodation of part of the College's functions, rather than the entirety of its activity, on this site.

The effect on residential amenity.

11.247. Local residents object to the loss of the open view over the playing field. However, as PPG1 points out, that is a matter of private enjoyment rather than a public interest to be protected by the planning system. In any case, the built environment policies of the UDP would be relevant to the consideration of the detailed effects on residential amenity in the event of applications for planning permission coming forward. However, in the event of the College not developing the site I do not concur with the LPA's alternative proposal to relocate the waste depot. Even if activities which now take place in the open were under cover I consider it an unsuitable neighbour in what, but for the College, is a residential area.

The effect on traffic generation.

11.248. Access to the College would remain as at present from Egerton Road or alternatively by the link proposed to the A316. I am mindful that the possibility of constructing a new junction on the A316 is fraught with uncertainty as it is within the jurisdiction of Transport for London. That being so, I support the conditional terms of the reference to access in the draft revised Proposal and justification agreed in the inquiry between the LPA and the College.

Summary.

11.249. I consider that, given the urgency to redevelop the College, the only feasible solution is to build Phase 1 on the playing field south of the A316. That involves its de-designation from MOL status, which I consider it does not merit in terms of the UDP criteria. I support the revision of the Proposal and its justification agreed by the College and the LPA, subject to the deletion of references to the relocation of the Council's Central Depôt as an alternative use for the site.

RECOMMENDATIONS

11.250. I recommend that the UDP be modified by the deletion of the wording of Proposal T37 and its justification and their substitution by the following:

‘Proposal T37 Richmond upon Thames College

Redevelopment to provide a new College and enabling residential development on the site of the existing College and playing field south of the A316. Retention and upgrading of Craneford Way East playing field.’

Justification

‘To provide rationalisation, expansion, and improvements to the College (either on the site of the the current buildings and/or on the College playing field to the immediate south of the A316) with enabling development and associated open space. If development takes place on the the College playing field south of the A316 the College’s Craneford Way playing field to be upgraded. All College facilities to have increased public use reflecting the Council’s dual use policy. Access to the trunk and local road network to be addressed at the development control stage.’