
Former ICL Private Ground, Teddington:
Representations to the Richmond upon Thames
Local Plan Examination 2017:
Hearing 5, Questions 8, 10 and 12

Prepared on behalf of Quantum Group

September 2017

Former ICL Private Ground, Teddington: Representations to the Richmond upon Thames Local Plan Examination 2017: Hearing 5, Questions 8, 10 and 12

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1.0 INTRODUCTION

- 1.1 Barton Willmore Landscape Planning and Design (BWLPD) have been commissioned by Quantum Group to provide representations to the examination of the London Borough of Richmond upon Thames (LBRuT) Local Plan ('the Local Plan'); specifically Hearing 5: Character and Design, Green Infrastructure and Climate Change.
- 1.2 Hearing 5 forms one of a number of matters being addressed by the Inspector to ascertain whether the submitted Local Plan is sound in accordance with National Planning Policy Framework (NPPF) paragraph 182, whereby the Local Plan must be:
- *"Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;*
 - *Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;*
 - *Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and*
 - *Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework."*
- 1.3 With reference to **Figure 1: Site Context Plan**, the Quantum Group own the former Imperial College London Private Ground, on Udney Park Road, Teddington ('the Site') and a number of the Inspectors questions raised in Hearing 5 are relevant to the Site, specifically with regards to its existing Other Open Land of Townscape Importance (OOLTI) designation and proposed Local Green Space (LGS) designation.
- 1.4 Quantum Group have previously submitted representations to the emerging Local Plan. Firstly in August 2016, Quantum Group submitted representations to LBRuT in relation to the Pre-Publication Consultation draft of the Local Plan. These representations are enclosed at **Appendix 1** for ease of reference. The representation proposed, amongst other things, an amended form of wording for Policy LP14 in respect of OOLTI. We submitted further representations on behalf of Quantum Group in February 2017 in response to the proposed LGS designation. We note from the Local Plan Guidance notes (ID/5) section 2 that the Inspector has been supplied with previous representations and that the Inspector will have equal regard to these, as well as the actual Hearing. The February 2017 Representations are included in **Appendix 2** for ease of reference for the Inspector.

- 1.5 For transparency, Quantum Group will be submitting a detailed Planning Application for the Site, and the relevant aspects of this are outlined in Chapter 2 of these representations.
- 1.6 These representations identify that the Local Plan is not sound, as the evidence base is neither justified nor effective.

2.0 SUMMARY OF INTENDED PLANNING APPLICATION

- 2.1 To aid the Inspector's understanding of the intended detailed Planning Application and the existing Site context, **Figure 1** demonstrates that the Site is situated within Teddington's residential settlement pattern, being bounded by built form on Kingston Lane, Cromwell Lane and Udney Park Road. The Site is not in public use and consists of 2 grassed sports pitches, hard surfaced tennis courts, clubhouse, and seating area. There are mature trees along the western and eastern edges of the Site, including TPOs on Kingston Lane and Udney Park Road. The visual envelope of the Site is very localised to the surrounding streets of Udney Park Road, Kingston Lane and Cromwell Road as a result of the surrounding built form.
- 2.2 The south-west part of the Site and wider townscape to the south of the Site are designated as an 'Area poorly provided with Public Open Space'. This is reflected in the LBRuT Open Space Assessment Report (April 2015) and LBRuT's Playing Pitch Strategy (August 2015), which both state the Site is 'under used' and 'not in use'.
- 2.3 The Site is considered to provide the opportunity for development as it is:
- not covered by any national landscape designations;
 - not within a Conservation Area, nor contains Listed Buildings or Scheduled Monuments;
 - visually well contained in relation to the wider townscape;
 - already characterised by playing fields which as a landscape/townscape feature are not rare or distinctive, and are not representative of 'beauty' in landscape/townscape terms;
 - not of historic significance;
 - does not exhibit any tranquillity due to the proximity to existing built form and road networks;
 - not publicly accessible and therefore a void in terms of recreational opportunities and connection to Green Infrastructure; and
 - does not demonstrate a richness of wildlife, as supported by the Phase 1 Ecology Report that will accompany the Planning Application, which identifies that there are no protected species on Site and that the hedgerows do not qualify as 'important' under the 1997 Hedgerow Regulations. A copy of the Phase 1 Ecology Report can be provided should the Inspector require it.
- 2.4 The Proposed Development will see the Site regenerated for a mixed-use development that will deliver high-quality sports and community facilities, alongside new public open space, affordable care led accommodation for Older People and a new GP surgery. This triple approach secures a sustainable, inclusive future for the Site, the benefits of which underpin the aims of national and local planning policy.

2.5 With the creation of a Community Interest Company (CIC), to which the sports and community facilities will be transferred in perpetuity for the use of the community, three areas will be established:

- Assisted living, extra care community, and new GP surgery;
- Open parkland with community Orchard and outdoor gym/trim trail, and paddock area; and
- Community sports facilities.

2.6 The proposed community sports facilities will comprise of the following:

- A full-size Third Generation artificial grass pitch (3G AGP);
- Natural grass playing pitch provision;
- Tennis Courts / MUGA; and
- Community pavilion containing changing rooms, kitchen, bar and server, flexible-use community rooms and crèche.

3.0 RESPONSE TO HEARING 5

Green Infrastructure

8. Is the evidence base supporting Policy LP12 and Local Green Space (LGS) robust?

Policy LP12: Green Infrastructure

- 3.1 We support the intention of Policy LP12: Green Infrastructure in identifying a variety of assets within the Borough to form the overall green infrastructure network range. However, the supporting policy text in paragraph 5.1.1 states that:

"there are many smaller pieces of open land, including land designated as Other Open Land of Townscape Importance, as well as non-designated land, all of which are of value to the local area and provide green oases for the local communities."

- 3.2 Clearly this cannot be justified given that the Site (designated as OOLTI), is not publicly accessible and therefore cannot currently provide the same 'value' to the local area as other publicly accessible OOLTI within the Borough. This is reflected by the LBRuT's Open Space Assessment Report (April 2015) and Playing Pitch Strategy (August 2015), both of which stated the Site is 'under used' and 'not in use'.

- 3.3 Moreover, paragraph 5.1.9 states:

"It is important to recognise that the borough's parks and open spaces provide not only recreational opportunities for those that live and work in this borough..."

- 3.4 This cannot be justified if the Site is not publicly accessible.

- 3.5 The supporting text for Policy LP12 therefore makes unjustified assumptions regarding the accessibility and 'value' of the OOLTI within the Borough and is not a robust basis to inform Policy LP12.

- 3.6 Policy LP12 should be amended to acknowledge that OOLTI are of 'varying value' given the differing land uses of these spaces across the Borough.

Policy LP13: Green Belt, Metropolitan Open Land and Local Green Space

- 3.7 We have included reference to Policy LP13 in the response to question 8 as Policy LP12 does not make reference to Local Green Space (LGS).

- 3.8 Policy LP13 is relevant to land which has:

"been demonstrated to be special to a local community and which holds a particular local significance..."

3.9 Paragraph 5.2.8 of the supporting text for Policy LP13 notes that LGS:

"has been demonstrated to have special qualities and hold particular significance and value to the local community which it serves."

3.10 Paragraph 5.2.10 of the supporting text for Policy LP13 outlines the criteria which are taken into account when defining LGS. The first three of these criteria are:

- ***"The site is submitted by the local community;***
- ***There is no current planning permission which once implemented would undermine the merit of a Local Green Space designation; and***
- ***The site is not land allocated for development within the Local Plan."***

3.11 These first three criteria are additional to the criteria for LGS as set out in the NPPF, and are not specific to the character, use and function of LGS, which is the focus of the NPPF criteria. The supporting text for Policy LP13 is therefore considered not to be positively prepared.

3.12 The fourth, fifth and sixth criteria of Policy LP13 paragraph 5.2.10 are:

- ***"The site is local in character and is not an extensive tract of land;***
- ***Where the site is publicly accessible, it is within walking distance of the community; OR where the site is not publicly accessible, it is within reasonably close proximity to the community it serves; and***
- ***The Local Green Space is demonstrably special to a local community and holds a particular local significance, for example, because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife."***

3.13 The fourth, fifth and sixth criteria therefore reflect the criteria for LGS designation as set out in NPPF paragraph 77. As established in Chapter 2, the Site, as an example of an area proposed as LGS, is not publicly accessible, is not of local significance because of its lack of beauty, historic significance, recreational value, tranquillity or richness of wildlife.

3.14 The LGS designation is therefore not objectively assessed and not positively prepared. The Local Plan can be made sound by omitting the Site as a potential LGS.

Is LP12 clear in its intention/wording and means of delivery? How is the approach to LGS designed to work in practice? What evidence underpins the policy formulation in this regard?

Policy LP12: Green Infrastructure

- 3.15 We consider that the intention/wording of LP12 is unclear. This is because the wording of LP12 alternates between the use of 'green spaces', 'assets', 'green infrastructure assets' and 'green infrastructure network', when no clear definition of any of these are provided.
- 3.16 In the context of Policy LP12 being about Green Infrastructure, we consider that it would be more effective to simply refer consistently to 'green infrastructure' within the wording of LP12.

Policy LP13: Green Belt, Metropolitan Open Land and Local Green Space

- 3.17 As noted, LP12 does not make reference to LGS and therefore we have included a response within this answer to Question 8.
- 3.18 We consider that the approach to LGS is not effective as it has not been informed by a robust evidence base and merely duplicates existing policies, such as OOLTI, which are considered to be adequate for the protection of the relevant green spaces within the Borough which adequately meet the OOLTI criteria.
- 3.19 The Plan can be made sound by the omission of the Site from the proposed designation of LGS.

10. What is the justification for LP14 and the designation of Other Open Land of Townscape Importance? Is the policy consistent with national policy?

- 3.20 We support the fact that the OOLTI designation does not preclude development.
- 3.21 However, the OOLTI designation covers too wide a variety of land uses, ranging from designated land to non designated land, private gardens to cemeteries, as well as areas of local value.
- 3.22 For an open area to be of townscape importance, it must be based upon a robust evidence base, in contrast to the proposed qualitative criteria for the OOLTI designation (set out in paragraph 5.3.4 of the supporting text for LP14: OOLTI).
- 3.23 Neither is the OOLTI a designation by which all of the criteria of paragraph 5.3.34 need to be met robustly, or with any effective means of understanding which aspects of the criteria carry more weight than others.

- 3.24 The OOLTI is therefore too broad and subjective an approach to identify areas of townscape importance, which should be based upon a strategy which seeks to objectively assess development and infrastructure requirements, such that it is positively prepared, rather than subjectively prepared.
- 3.25 Moreover NPPF paragraph 73 states in relation to high quality open spaces (which should include those of townscape importance) that planning policies should be based on robust and up-to-date assessments. The OOLTI criteria is neither up to date nor robust.
- 3.26 This is particularly pertinent to the Site, for which the LBRuT Open Space Assessment Report (April 2015) and LBRuT's Playing Pitch Strategy (August 2015), state the Site is 'under used' and 'not in use', yet is still proposed as OOLTI.
- 3.27 Policy LP14 is therefore not considered to be consistent with national policy.
- 3.28 Should the Inspector decide, having considered the case set out above, that it is not appropriate to remove the site from OOLTI, we would refer him to the representations previously made by the Quantum Group in August 2016 (as enclosed at Appendix 1). We proposed a rewording of Policy LP14, as set out in our representation form, which would enable proposals that create a materially better outcome for the provision, access and useability of community facilities, sport and open space, to be permitted as in accordance with LP14. It is our view that such a proposed rewording of Policy LP14 would result in a positive improvement. The proposed changes would not, in our view, weaken LBRuT's position in defending themselves against proposals that result in the loss of open space to development. On the contrary, it would allow LBRuT to support proposals that might result in some change to open space, including a small amount of loss, but which might result in a significant overall betterment to the local community and Borough as a whole.

12. Is LP16 B(3) justified, consistent with national policy and will it be effective in delivery?

- 3.29 We support new tree planting both as part of new schemes and as part of the mitigation for the loss of existing trees. However Policy LP16 B(3) is not considered to be an effective approach, for example in the potential replacement of a mature tree with another mature tree, it is very unlikely to be successful in reality. Replacement of a mature tree is more appropriately dealt with via a younger tree being planted and enabled to grow and establish.
- 3.30 NPPF paragraph 118 is clear on the need to protect aged or veteran trees unless the development clearly outweighs the loss, but does not advocate CAVAT. Policy LP16 B(3) is therefore not effective, nor supported by national policy and is unlikely to be effective in delivery.

3.31 Policy LP16 B(4) is considered to be effective and would enable the removal of B(3) from the policy wording, whilst still ensuring new tree planting within developments.

ILLUSTRATIVE MATERIAL







Figure 1: Site Context Plan



The scaling of this drawing cannot be assured

Revision Date Dm Ckd



- LEGEND**
-  Site Boundary
 -  Listed Buildings ~
 -  Tree Preservation Order
 -  Other Open Land of Townscape Importance **
 -  Area poorly provided with Public Open Space **
 -  Buildings of Townscape Merit

Source: Historic England National Monument Record (NS) Data Set
 ** London Borough of Richmond upon Thames Local Plan - Proposed Map, Adopted July 2015
 Data obtained for consultation and analysis mapping based on publicly available sources to the best of our knowledge and belief. The accuracy of data derived from external sources cannot be held for the accuracy of data derived from external sources.

FIGURE 1

Project
 Former ICL Private Ground,
 Teddington
 Drawing Title
 Site Appraisal Plan


Date	06.09.2017	Scale	1:2,000 @A2	Drawn by	MK	Check by	RH
Project No	25615	Drawing No	L201	Revision	-		



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Appendices

Appendix 1: August 2016 Representations



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By email: localplan@richmond.gov.uk

18th August 2016

Dear Sir

Pre-Public Consultation - Local Plan

Response by Quantum Group

Please find enclosed representations to the above Local Plan consultation. We are making two separate submissions that whilst linked can also be taken independently. The responses are to Policy LP 14 and a proposed new site allocation for the former Imperial College Private Ground, Udney Park Road, Teddington.

We look forward to confirmation that our representations have been received and validated. Should you wish to discuss our proposals then please contact me.

Yours sincerely

Sam Hobson



Local Plan Review Pre-Publication Consultation

From 8 July to 19 August 2016

RESPONSE FORM

The Council is inviting comments over a six week period on the first draft of the Local Plan.

The draft Local Plan sets out a 15-year strategic vision, objectives and the spatial strategy for the borough as well as the planning policies that will guide future development in the borough. It looks ahead to 2033 and identifies where the main developments will take place, and how places within the borough will change, or be protected from change, over that period. In addition, the draft Local Plan sets out the site allocations that are considered to assist with the delivery of the vision and strategy of the Plan. This is of particular importance for ensuring there is sufficient land for employment, retail, housing and social infrastructure. We would like to hear the views from our local communities, businesses and other key organisations on the draft Plan.

How to respond

Please read the consultation documents and other background information made available on the Local Plan website. To view the draft Local Plan and take part in the consultation, visit **www.richmond.gov.uk/pre-publication**

You can respond on the consultation documents in the following ways:

- Online at **www.richmond.gov.uk/pre-publication**, where you can find a link to our **online consultation portal** and online representation form (you can also review the documents online);
- Email to **LocalPlan@richmond.gov.uk** this response form (a PDF and Word version of the form can be found on the Council's website at www.richmond.gov.uk/pre-publication). In the form in 'Word' format you can type in your response and return it as an email attachment.
- Send the form to Policy and Design, LB Richmond upon Thames, Civic Centre, 44 York Street, Twickenham, TW1 3BZ; or hand-deliver your completed form to the ground floor reception in the Civic Centre.

All responses must be received by Friday **19 August 2016**.

This form has three parts:

- Part A – Personal details and about you
- Part B – Your general views
- Part B – Your detailed response

Part A: Personal Details

	1. Personal Details *	2. Agent's Details (if applicable)
Title	Mr	
First name	Sam	
Last name	Hobson	
Job title (where relevant)		
Organisation (where relevant)	Quantum Group	
Address	Quantum House, 170 Charminster Road, Bournemouth, BH8 9RL	
Postcode	BH8 9RL	
Telephone	01202 531 635	
Fax		
E-mail address	samh@quatumgroup.org.uk	

*If an agent is appointed, please complete only the title, name and organisation boxes but complete the full contact details of the agent.

Part A: About You...

3. Please tell us about yourself or who you are responding on behalf of... (tick all which apply)

Do you live in the borough?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Do you work in the borough?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Do you run a business in the borough?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Are you a student in the borough?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Are you a visitor to the borough?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

Data protection

Information provided in this form will be used fairly and lawfully and the Council will not knowingly do anything which may lead to a breach of the Data Protection Act 1998.

All responses will be held by the London Borough of Richmond upon Thames. They will be handled in accordance with the Data Protection Act 1998. Responses will not be treated as confidential and will be

published on our website and in any subsequent statements; however, personal details like address, phone number or email address will be removed.

For further details regarding your privacy please see the Council's information published at: www.richmond.gov.uk/data_protection

Part B: Your General Views

4. Do you agree or disagree with the Strategic Vision? (section 2.2)

Strongly Agree Agree Neither Agree/Disagree Disagree Strongly Disagree

Any comments:

It is agreed that the Plan needs to strike an acceptable balance between meeting the future needs of its residents (such as elder residential accommodation and care, and access to open space and sports a facilities), businesses and visitors, whilst maintaining the character of the Borough. Therefore, the "Golden Thread", referred to in paragraph 2.2 and set out in the "Strategic Vision", is supported.

It should be recognised that the "Strategic Vision" is a high level statement and so should be treated as such. The high level "Vision" cannot sufficiently address the complexities of meeting the needs of society over the plan period without providing further detail, which is what the rest of the Local Plan seeks to do. As we have set out, not all of this detail is supported (see below).

It should be noted that in many situations there will be opposing pros and cons and so flexibility and judgement will be required in order to meet the high level vision. Maximising the potential of sites, including maximising underutilised sites and making them work as hard as they can, is important to meeting its needs whilst protecting the character of the Borough. This may mean that flexibility is required so that whilst some aspects of development proposals may be positive and some negative, if the overall outcome is positive then proposals should be supported.

In the application of the Plan over the plan period, the Council needs to ensure that it continues to make an acceptable contribution to meeting wider London and South East issues, beyond those of just its borough.

5. Do you agree or disagree with the Strategic Objectives? (section 2.3)

Strongly Agree Agree Neither Agree/Disagree Disagree Strongly Disagree

Any comments:

It is considered that the Strategic Objectives do not provide sufficient and specific emphasis on identifying and then prioritising to meet the accommodation and social and infrastructure needs of the elderly sector of the Borough's population. The remainder of the Strategic Objectives are supported.

It is noted that the Council is yet to publish data on the housing needs of the elderly and to therefore create a Local Plan policy and allocations strategy for meeting this need. We have undertaken our own research, which concludes the following.

The London Plan sets a minimum yearly housing provision target for LBR of 315dpa. Within in that, the Plan establishes an annualised need for LBR to deliver 105 private and 30 intermediate sale homes for the elderly. Over the Plan Period LBR is expected to experience a continued increase in the population of older people (above 55). LBR already has a higher than average older resident population. The Borough's existing elderly care accommodation is in the form of conventional sheltered housing, which is already over capacity with a shortfall of circa 1,000 units. This shortfall, unless specific accommodation is developed, will increase to over 1,500 units by 2019.

Based on the above, we consider that the Local Plan needs to consider the housing needs of the elderly population more specifically and will need to identify sites for allocation and planning policy to ensure the plan is sound. The next version of the emerging Local Plan must specifically address these issues. As it stands, the emerging plan fails in this.

6. Do you agree or disagree with the Spatial Strategy? (section 3.1)

Strongly Agree Agree Neither Agree/Disagree Disagree Strongly Disagree

Any comments:

In particular paragraphs 3.1.4, 3.1.13, 3.1.22 and 3.1.24 as specifically supported. These paragraphs set out clearly the desire of the Council to ensure that the needs of the community are being considered when specific planning proposals are being assessed. The policies of the plan need to ensure that they

mirror the objectives set out. As we note below, not all of the policies achieve this in their current written form and we propose amendments that we consider will help the plan achieve its objectives.

As an example, a lot of focus is given to the protection of open spaces and community facilities in the borough for both meeting the needs of the borough population but also in giving the borough its character and desirability. In principle, this approach is supported. However, the situation whereby such assets are not being best utilised to provide the maximum benefit to the local community is not fully contemplated. Such circumstances might exist whereby some “enabling” or “facilitating” development can result in great gains being made to the strategic vision and objectives of the Council for the borough and for the benefit of the wider community. This might mean proposals may have some perceived isolated negative consequences but the overall effect of the proposal might be overwhelmingly positive.

It is considered that this complexity needs to be acknowledged in the Spatial Strategy section and then specific policies and the supporting text of the Local Plan needs to reflect this.

Part C: Your Detailed Response

7. To which parts of the Local Plan Review does your response relate to?

Please indicate the documents **and** the specific paragraph numbers, policy or site allocation numbers and names, maps or tables you are commenting on.

Documents		Sections	
Draft Local Plan	<input checked="" type="checkbox"/>	Page number(s)	70 - 72
		Paragraph number(s)	5.3.1 - 5.3.7
		Policy no./name	LP14 - Other Open Land of Townscape Importance
		Site Allocation(s) no./ name	
		Maps	
		Tables	
Sustainability Appraisal Report	<input type="checkbox"/>	Page number(s)	
		Paragraph number(s)	
Other (for example an omission or alternative approach)	<input type="checkbox"/>		

8. Please give details below to set out your representation.

Please make it very clear to which document your comments relate to by indicating policy/site reference, name and number, and/or paragraph number.

As set out in our response to Questions 4, 5, and 6 (above), we are conscious of the need for specific policies of the Plan to ensure that they are flexible enough to accommodate, rather than frustrate, development proposals that will achieve the Strategic Vision and Objectives of the plan (as set out in Sections 2.2, 2.3, 3.1, and paragraphs 3.1.1-3.1.41).

We propose changes to the wording of Policy LP14 to reflect our comments (set out above) and also to better mirror the supporting text to the policy at paragraph 5.3.6. Policy LP14 is reproduced below with the changes sought:

“New Policy LP 14

Other Open Land of Townscape Importance

Other open areas that are of townscape importance will be protected in open use, and enhanced where possible. It will be recognised that there may be exceptional cases where appropriate development is acceptable. The following criteria will be taken into account when assessing whether development is

appropriate:

- a. it must be linked to the functional use of the Other Open Land of Townscape Importance; or
- b. it can only be a replacement of, or minor extension to, existing built facilities; or
- c. it forms part of comprehensive proposals for community and social infrastructure that results in new, or improved provision of and quality of facilities, and improves on the usability and accessibility of the open land and its facilities by the general public, and;
- d. it does not materially harm the overall character or overall openness of the open land.

Improvement and enhancement of the openness or character of other open land and measures to open up views into and out of designated other open land will be encouraged.

For criterion d. evidence of “material harm” will be considered where more than 12.5% of the designated open land is proposed to be lost to development.

When considering developments on sites outside designated other open land, any possible visual impacts on the character and openness of the designated other open land will be taken into account.”

The proposed amendments would enable proposals that overall create a materially better outcome for the provision, access and usability of community facilities, sport and open space, to be permitted as in accordance with Policy LP14. The proposed changes are written in such a way that it does not, in our view, weaken the Council’s position in defending against proposals that result in the loss of open space to development, but allows the Council to support proposals that might result in some change to open space, including a small amount of loss, but which overall results in a significant overall betterment to the local community and borough as a whole. On this basis, we consider that with our wording changes, Policy LP14 better reflects the Council’s own intentions, as set out particularly in paragraph 5.3.6 and in section 2.3, and so represents a positive proposal.

The reason why these changes are put forward can be explained as below.

- We are the owners of the former Imperial College Private Ground at Udney Park Road in Teddington. We completed the acquisition of the site in September 2015. Whilst we took part in the Consultation on Scope of Review of Policy and draft Site Allocations (January 2016 – February 2016), having only just acquired the site we advised the Council that we would be in a better position to set out our plans for the site at the time of the Pre-Publication Consultation. Our plans are broadly as follows.

- We acquired the site because it was substantially underutilised and an opportunity existed to propose something that would be materially beneficially for residents of Teddington and beyond, whilst preserving the openness of the site and its townscape importance.

- The former Imperial College Private Ground (which extends to some 5.2ha) has been in private

ownership since the 1950s. The site has been used privately with only limited and occasional third party use. The whole site was enclosed by a close-boarded fence up until 1989. Fullerton Court (a 38-unit retirement block) was developed on part of the site during the 1990s.

- The site was designated as an Asset of Community Value in March 2016, something that we support and wish to strengthen further. Our aims for the site are twofold:

1. Our first aim is to open up the majority of the site for public access to be used for sport and recreation. As noted above, this will be a substantial improvement for the community over how the site has been used to date and it reflects the objectives the Local Plan is seeking, as set out in section 3.1. To make the most of the sporting and recreational opportunities the site presents for the community, we intend to invest significantly in the development of new sport and recreation facilities, provide a structure for the in-perpetuity operation and maintenance of the land and gift this to the community/LPA. There has been an approach by local interested parties to establish a "Community Interest Company" to potentially take over ownership and run the site in the community interest. This is being actively explored.

2. The second aim for the site is to develop approximately one third of the land as a Continuing Care Retirement Community (retirement/extra care/care home accommodation) that may include health care and other community uses for the wider community and help meet Richmond's pressing requirement for specialist accommodation. We are owners and operators of care-led communities for the elderly and care homes and intend to develop and then run this site as our own facility. This element of development will not only meet an important growing community need but will also enable the funding for the first aim for the site (as above).

Therefore our objective is to bring forward proposals for the site that will benefit the community and be progressive. We are confident that we can bring forward proposals that will preserve the overall townscape character of the site for residents and the borough, open up the majority of the site for public ownership and use, substantially increase the sports and recreation facilities of the borough, deliver much needed specialist elderly care accommodation, provide new community health facilities, and create meaningful employment opportunities to further improve social infrastructure.

The changes that we propose to Policy LP14 will enable planning policy to better respond to opportunities, such as ours, that might come forward over the plan period and provide a policy context to control and judge them.

Please continue on a separate sheet / expand box if necessary.

9. Please set out what change(s) you consider necessary, why these changes should be made and what your supporting evidence is.

"New Policy LP 14

Other Open Land of Townscape Importance

Other open areas that are of townscape importance will be protected in open use, and enhanced where possible. It will be recognised that there may be exceptional cases where appropriate development is acceptable. The following criteria will be taken into account when assessing whether development is appropriate:

- a. it must be linked to the functional use of the Other Open Land of Townscape Importance; or
- b. it can only be a replacement of, or minor extension to, existing built facilities; or
- c. it forms part of comprehensive proposals for community and social infrastructure that results in new, or improved provision of and quality of facilities, and improves on the usability and accessibility of the open land and its facilities by the general public, and;
- d. it does not materially harm the overall character or overall openness of the open land.

Improvement and enhancement of the openness or character of other open land and measures to open up views into and out of designated other open land will be encouraged.

For criterion d. evidence of "material harm" will be considered where more than 12.5% of the designated open land is proposed to be lost to development.

When considering developments on sites outside designated other open land, any possible visual impacts on the character and openness of the designated other open land will be taken into account."

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Please continue on a separate sheet / expand box if necessary.

Please note your detailed response should cover succinctly all the information, evidence and supporting information necessary to support / justify the response and the suggested change.

Following the consultation on the draft Local Plan this summer, we will consider and take account of all responses received. There will be a further opportunity to view and comment on the final draft version of the Local Plan later this year, before it will be submitted in 2017 to the Secretary of State for examination in public by an independent planning inspector.

10. If you are not on our consultation database and you respond to this consultation, your details will be added to the database. This allows us to contact you with updates on the progression of the Local Plan and other planning policy documents.

If you do not wish to be added to our database or you would like your details to be removed, then please tick this box, complete Part A: Personal Details of this form and return it to us as appropriate.

<input type="checkbox"/>

Signature: <small>For electronic responses a typed signature is acceptable.</small>	Sam Hobson	Date:	18/08/2016
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Local Plan Review Pre-Publication Consultation

From 8 July to 19 August 2016

RESPONSE FORM

The Council is inviting comments over a six week period on the first draft of the Local Plan.

The draft Local Plan sets out a 15-year strategic vision, objectives and the spatial strategy for the borough as well as the planning policies that will guide future development in the borough. It looks ahead to 2033 and identifies where the main developments will take place, and how places within the borough will change, or be protected from change, over that period. In addition, the draft Local Plan sets out the site allocations that are considered to assist with the delivery of the vision and strategy of the Plan. This is of particular importance for ensuring there is sufficient land for employment, retail, housing and social infrastructure. We would like to hear the views from our local communities, businesses and other key organisations on the draft Plan.

How to respond

Please read the consultation documents and other background information made available on the Local Plan website. To view the draft Local Plan and take part in the consultation, visit **www.richmond.gov.uk/pre-publication**

You can respond on the consultation documents in the following ways:

- Online at **www.richmond.gov.uk/pre-publication**, where you can find a link to our **online consultation portal** and online representation form (you can also review the documents online);
- Email to **LocalPlan@richmond.gov.uk** this response form (a PDF and Word version of the form can be found on the Council's website at www.richmond.gov.uk/pre-publication). In the form in 'Word' format you can type in your response and return it as an email attachment.
- Send the form to Policy and Design, LB Richmond upon Thames, Civic Centre, 44 York Street, Twickenham, TW1 3BZ; or hand-deliver your completed form to the ground floor reception in the Civic Centre.

All responses must be received by Friday **19 August 2016**.

This form has three parts:

- Part A – Personal details and about you
- Part B – Your general views
- Part B – Your detailed response

Part A: Personal Details		
	1. Personal Details *	2. Agent's Details (if applicable)
Title	Mr	
First name	Sam	
Last name	Hobson	
Job title (where relevant)		
Organisation (where relevant)	Quantum Group	
Address	170 Charminster Road Bournemouth BH8 9RL	
Postcode	BH8 9 RL	
Telephone	01202 531 635	
Fax		
E-mail address	samh@quantumgroup.org.uk	

*If an agent is appointed, please complete only the title, name and organisation boxes but complete the full contact details of the agent.

Part A: About You...		
3. Please tell us about yourself or who you are responding on behalf of...(tick all which apply)		
Do you live in the borough?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Do you work in the borough?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Do you run a business in the borough?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Are you a student in the borough?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Are you a visitor to the borough?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

Data protection

Information provided in this form will be used fairly and lawfully and the Council will not knowingly do anything which may lead to a breach of the Data Protection Act 1998.

All responses will be held by the London Borough of Richmond upon Thames. They will be handled in accordance with the Data Protection Act 1998. Responses will not be treated as confidential and will be published on our website and in any subsequent statements; however, personal details like address, phone number or email address will be removed.

For further details regarding your privacy please see the Council's information published at:
www.richmond.gov.uk/data_protection

Part B: Your General Views

4. Do you agree or disagree with the Strategic Vision? (section 2.2)

Strongly Agree Agree Neither Agree/Disagree Disagree Strongly Disagree

Any comments:

5. Do you agree or disagree with the Strategic Objectives? (section 2.3)

Strongly Agree Agree Neither Agree/Disagree Disagree Strongly Disagree

Any comments:

It is considered that the Strategic Objectives do not provide sufficient and specific emphasis on identifying and then prioritising to meet the accommodation and social and infrastructure needs of the elderly sector of the Borough's population. The remainder of the Strategic Objectives are supported.

It is noted that the Council is yet to publish data on the housing needs of the elderly and to therefore create a Local Plan policy and allocations strategy for meeting this need. We have undertaken our own research, which concludes the following.

The London Plan sets a minimum yearly housing provision target for LBR of 315 dpa. Within that, the Plan establishes an annualised need for LBR to deliver 105 private and 30 intermediate sale homes for the elderly. Over the Plan Period LBR is expected to experience a continued increase in the population of older people (above 55). LBR already has a higher than average older resident population. The Borough's existing elderly care accommodation is in the form of conventional sheltered housing, which is already over capacity with a shortfall of circa 1,000 units. This shortfall, unless specific accommodation is developed, will increase to over 1,500 units by 2019.

Based on the above, we consider that the Local Plan needs to consider the housing needs of the elderly population more specifically and will need to identify sites for allocation and planning policy to ensure the plan is sound. The next version of the emerging Local Plan must specifically address these issues. As it stands, the emerging plan fails in this. Our response to question 8 (see below) proposes a new site allocation to help meet this need.

6. Do you agree or disagree with the Spatial Strategy? (section 3.1)

Strongly Agree <input type="checkbox"/>	Agree <input type="checkbox"/>	Neither Agree/Disagree <input type="checkbox"/>	Disagree <input type="checkbox"/>	Strongly Disagree <input type="checkbox"/>
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Any comments:

Part C: Your Detailed Response

7. To which parts of the Local Plan Review does your response relate to?

Please indicate the documents **and** the specific paragraph numbers, policy or site allocation numbers and names, maps or tables you are commenting on.

Documents		Sections	
Draft Local Plan	<input type="checkbox"/>	Page number(s)	
		Paragraph number(s)	
		Policy no./name	
		Site Allocation(s) no./ name	
		Maps	
		Tables	
Sustainability Appraisal Report	<input type="checkbox"/>	Page number(s)	
		Paragraph number(s)	
Other (for example an omission or alternative approach)	<input checked="" type="checkbox"/>	Insert New Site Allocation to Local Plan at Chapter 12 - Site Allocation, page 203 onwards.	

8. Please give details below to set out your representation.

Please make it very clear to which document your comments relate to by indicating policy/site reference, name and number, and/or paragraph number.

We propose the allocation of a new site as follows.

“SA28: FORMER IMPERIAL COLLEGE PRIVATE GROUND, UDNEY PARK ROAD, TEDDINGTON

The Council supports the continued use of the fields for sports purposes. As part of comprehensive development proposals the council may support the partial development of a maximum of 2 ha for Class C2 extra care accomodation, care home accommodation and community and health facilities if this leads to least 3.2ha of the site being made available in perpetuity to the local community for open sports and recreational purposes. The sport and recreational facilities will be required to be substantially upgraded and improved and a long-term ownership, management and maintenance plan prepared that will ensure on-going financial stability and community access or ownership for any proposals to be supported by the Council.

The Council recognises that the site’s openness and scale means it provides an important townscape benefit to establishing and reinforcing the local area’s character. However, as the site is private open land and is in private ownership with up to 90% of the perimeter boundary enclosed by development, close boarded fence or thick hedge this means the site is not maximising its potential to enhance the

areas open character. The Council recognises that it does not presently meet its full potential in terms of accessible community use and contribution to openness and views into the site, which is a lost opportunity, particularly as the general area is identified as an area poorly provided by public open space in the present adopted proposals map (see Policy DMOS6), and in the background papers – Open Land Review and Sport, Open Space and Recreation Needs Assessment.

The Council recognises that in order to realise the benefits the site could bring to the community, an element of “enabling” development is needed. The Council recognises that the Borough needs to meet the housing requirements of all sections of society, particularly the elderly and extra care, as detailed in our response to Question 5 (above), including in LBRs Wellbeing and Independence Framework for Prevention 2015-2018, and LBRs Intermediate Housing Policy, which seeks to work in partnership to provide and market sustainable intermediate housing and provide tailored housing products which offer a local home ownership solutions, such as elderly (or over 55s) shared ownership.

The Council considers that if carefully and comprehensively planned, the overall site could provide material benefit to the community on a wide range of areas whilst protecting its contribution to the townscape and character of Teddington. The Council will therefore support a comprehensive package of proposals that will collectively deliver:

- 1- At least 3.2 ha of publicly accessible open space for sport and recreation in perpetuity, in the broad area identified on the attached plan.
- 2- A combination of sports pitches to meet the needs of the community in the form of 1 international standard 3G rugby pitch, a cricket square with 4 wickets, 1 national standard grass football pitches, 1 MUGA/tennis court, youth pitches, a new pavilion, changing rooms and car parking, or another arrangement as agreed with the Council and other relevant stakeholders, in the broad area identified on the attached plan.
- 3- A management and maintenance plan, developed with the Council and local groups, covering the land shown to the south on the attached plan that secures the long-term financial security of this site, and transfers the land to the Council or local community ownership.
- 4- Continuing Care Retirement Accommodation (including a mix of Class C2 extra care accommodation and care homes) and one or more complimentary social, educational, and health facilities that will also be available to the wider community.
- 5- The protection of the general openness and character of the area. It is acknowledged that there will be some impact as a result of proposals but the outcome should be to protect the overall feeling of openness the site presently provides.”

The basis for this new allocation proposal is as follows:

We are the owners of the former Imperial College Private Ground at Udney Park Road in Teddington. We completed the acquisition of the site in September 2015. Whilst we took part in the Consultation on Scope of Review of Policy and draft Site Allocations (January 2016 – February 2016), having only just acquired the site we advised that we would be in a better position to set out our plans for the site at the time of the Pre-Publication Consultation. Our plans are broadly as follows.

We acquired the site because it was substantially underutilised and an opportunity existed to propose something that would be materially beneficially for residents of Teddington and beyond, whilst preserving the openness of the site and its townscape importance.

The former Imperial College Private Ground (which extends to some 5.2ha) has been in private ownership since the 1950s. The site has been used privately with only limited and occasional third party use. The whole site was enclosed by a close-boarded fence up until 1989. Fullerton Court (a 38-unit retirement block) was developed on part of the site during the 1990s.

The site was designated as an Asset of Community Value in March 2016, something that we support and wish to strengthen further. Our aims for the site are twofold:

1. Our first aim is to open up the majority of the site for public access to be used for sport and recreation. As noted above, this will be a substantial improvement for the community over how the site has been used to date and it reflects the objectives the Local Plan is seeking, as set out in section 3.1. To make the most of the sporting and recreational opportunities the site presents for the community, we intend to invest significantly in the development of new sport and recreation facilities, provide a structure for the in-perpetuity operation and maintenance of the land and gift this to the community/LPA. There has been an approach by local interested parties to establish a "Community Interest Company" to potentially take over ownership and run the site in the community interest. This is being actively explored.
2. The second aim for the site is to develop approximately one third of the land as a Continuing Care Retirement Community (retirement/extra care/care home accommodation) that may include health care and other community uses for the wider community and help meet Richmond's pressing requirement for specialist accommodation. We are owners and operators of care-led communities for the elderly and care homes and intend to develop and then run this site as our own facility. This element of development will not only meet an important growing community need but will also enable the funding for the first aim for the site (as above).

Therefore our objective is to bring forward proposals for the site that will benefit the community and be progressive. We are confident that we can bring forward proposals that will preserve the overall townscape character of the site for residents and the borough, open up the majority of the site for public ownership and use, substantially increase the sports and recreation facilities of the borough, deliver much needed specialist elderly care accommodation, provide new community health facilities, and create meaningful employment opportunities to further improve social infrastructure.

The introduction of a new specific site allocation for the former Imperial College Private Ground is so that the Council can efficiently control the development of the site and to provide the site owner and community with clarity and certainty of the future. The proposed new allocation is considered to deliver exactly the sort of development that the Strategic Vision and Objectives of Plan (as set out in sections 2.2, 2.3, 3.1, and paragraphs 3.1.1 - 3.1.24 and 5.3.6) are promoting. It is on this basis that the new allocation is put forward.

Please continue on a separate sheet / expand box if necessary.

9. Please set out what change(s) you consider necessary, why these changes should be made and what your supporting evidence is.

As set out in answer to question 8 above, a new site allocations policy is needed. A site plan is also included.

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Please continue on a separate sheet / expand box if necessary.

Please note your detailed response should cover succinctly all the information, evidence and supporting information necessary to support / justify the response and the suggested change.

Following the consultation on the draft Local Plan this summer, we will consider and take account of all responses received. There will be a further opportunity to view and comment on the final draft version of the Local Plan later this year, before it will be submitted in 2017 to the Secretary of State for examination in public by an independent planning inspector.

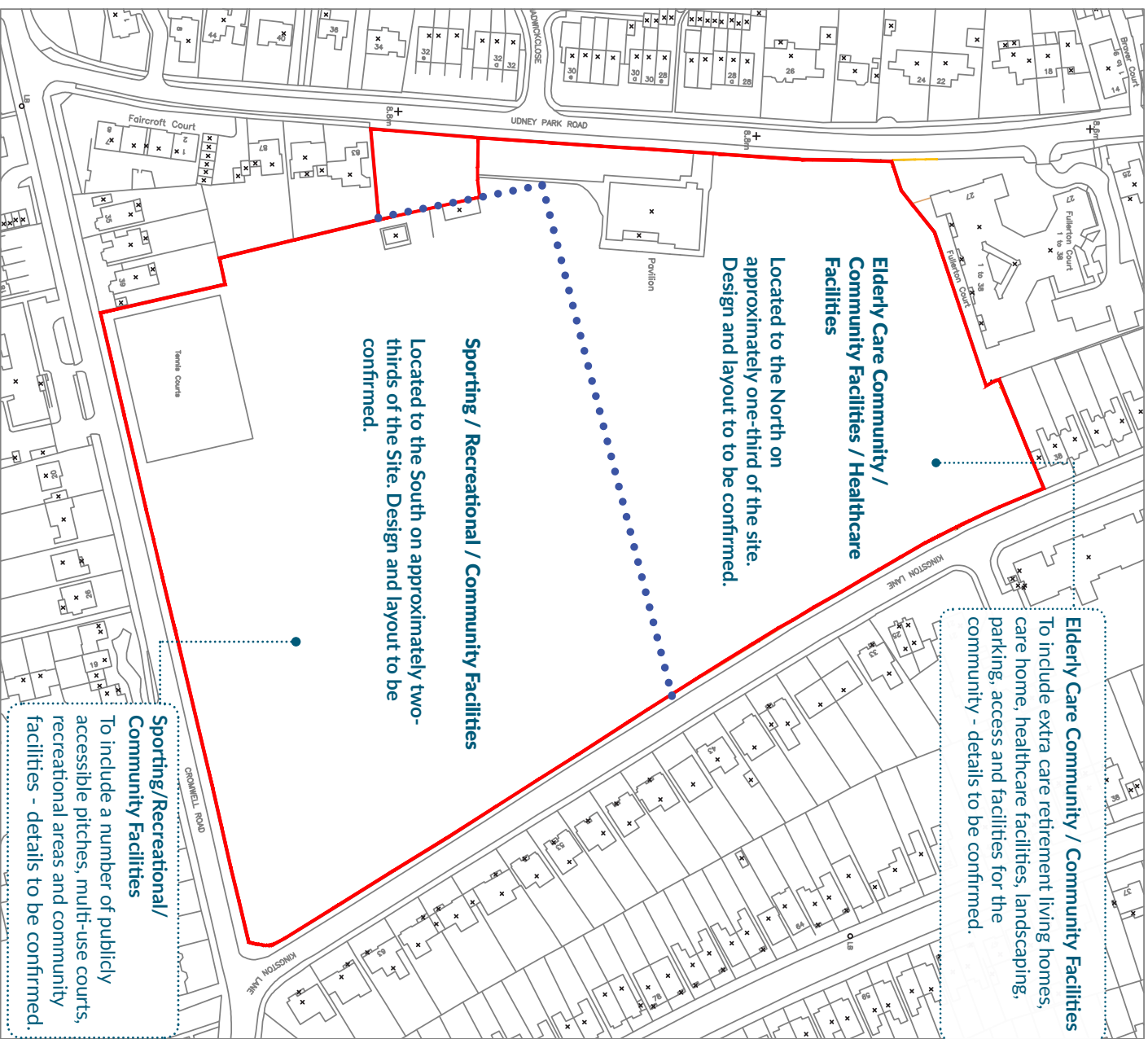
10. If you are not on our consultation database and you respond to this consultation, your details will be added to the database. This allows us to contact you with updates on the progression of the Local Plan and other planning policy documents.

If you do not wish to be added to our database or you would like your details to be removed, then please tick this box, complete Part A: Personal Details of this form and return it to us as appropriate.	<input type="checkbox"/>
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Signature: <small>For electronic responses a typed signature is acceptable.</small>	Sam Hobson	Date:	18/08/2016
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Site plan showing ownership boundary and indicative use zones to accompany Quantum Group's pre-publication consultation response form.

18th August 2016



Appendices

Appendix 2: February 2017 Representations

Local Plan Publication Consultation

From 4 January to 15 February 2017

REPRESENTATION FORM

The Publication Local Plan ('the Plan') sets out a 15-year strategic vision, objectives and the spatial strategy for the borough as well as the planning policies that will guide future development in the borough. It looks ahead to 2033 and identifies where the main developments will take place, and how places within the borough will change, or be protected from change. The Plan also allocates and designates sites/areas that are considered to assist with the delivery of the vision and strategy of the Plan.

This is the final representations stage before the documents are submitted to the Secretary of State for independent Examination in Public. **At this stage your comments should relate to issues of legal and procedural compliance, the "soundness" of the Plan and the "Duty to Co-operate"**. There are accompanying guidance notes which can be downloaded from the [Council's website](http://www.richmond.gov.uk/councils-website) at www.richmond.gov.uk/local_plan/local_plan_review

How to respond

Please read the consultation documents, which include the Publication Local Plan, the Proposals Map changes and the Sustainability Appraisal, as well as other background information on the [Local Plan website](http://www.richmond.gov.uk/local_plan/local_plan_review) at www.richmond.gov.uk/local_plan/local_plan_review

You can respond to the consultation documents in the following ways:

- **Online** at www.richmond.gov.uk/local_plan/local_plan_review, where you can find a link to our **online consultation portal** and online representation form.
- **Email** your completed representation form to LocalPlan@richmond.gov.uk (A PDF and a Word version of the form can be found on the website via the above link). The 'Word' version allows you to type in your response, which can then be emailed.
- **Send** the form to Local Plan Team, LB Richmond upon Thames, Civic Centre, 44 York Street, Twickenham, TW1 3BZ; or **hand-deliver** it to the ground floor reception in the Civic Centre.

We would prefer all comments to be made electronically, ideally through the online consultation portal. This is also the quickest and easiest way of responding.

All representations, which will be made publicly available, must be received **by 5pm on 15 February 2017**.

This form has two parts:

- Part A – Personal details and about you
- Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

Part A: Personal Details

	1. Personal Details	2. Agent's Details (if applicable)
Title	Mr	Mr
First name	Sam	Robin
Last name	Hobson	Meakins
Job title (where relevant)		Partner
Organisation (where relevant)	Quantum Group	Barton Willmore LLP
Address	Quantum House 170 Charminster Road Bournemouth	7 Soho Square London
Postcode	BH8 9RL	W1D 3QB
Telephone	01202-531635	020-7446-6888
Fax	-	-
E-mail address	samh@quantumgroup.org.uk	robin.meakins@bartonwillmore.co.uk

Data protection

Information provided in this form will be used fairly and lawfully and the Council will not knowingly do anything which may lead to a breach of the Data Protection Act 1998.

All responses will be held by the London Borough of Richmond upon Thames. They will be handled in accordance with the Data Protection Act 1998. Responses will not be treated as confidential and will be published on our website and in any subsequent statements; however, personal details like address, phone number or email address will be removed.

For further details regarding your privacy please see the Council's information published at:
www.richmond.gov.uk/data_protection

Part B: Your Representation(s)

Name or Organisation:

3. To which part of the Local Plan does your representation relate to?

Please indicate the document(s) **and** the specific paragraph numbers, policy or site allocation numbers and names, maps or tables you are commenting on.

Documents	">	Sections	
Publication Local Plan	<input checked="" type="checkbox"/>	Page number(s)	54-58
		Paragraph number(s)	5.2 and 5.3 (and their sub-paragraphs)
		Policy no./name	LP13, and LP14
		Site Allocation no./ name	Udney Park Playing Fields, Teddington
		Map(s)	-
		Table(s)	-
Local Plan Proposals Map Changes	<input checked="" type="checkbox"/>	Page number(s)	3-4 (Section 2.2)
		Site name	Udney Park Playing Fields, Teddington
		Map(s)	Page 3, paragraph 2.2.1
		Table(s)	-
Sustainability Appraisal Report	<input type="checkbox"/>	Page number(s)	
		Paragraph number(s)	
		Table(s)	
Other (for example an omission or alternative approach)	<input checked="" type="checkbox"/>	Previous Quantum Group representations, REF: 475 and REF: 166	

4. Do you consider the Local Plan is:

4.(1) Legally compliant	Yes <input type="checkbox"/>	No <input type="checkbox"/>
4.(2) Sound	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
4.(3) Complies with the Duty to Co-operate	Yes <input type="checkbox"/>	No <input type="checkbox"/>

If you have entered 'No' to 4.(2), please continue with Q5. In all other circumstances, please go to Q6.

5. Do you consider the Local Plan is unsound because it is not:

5.1 Positively Prepared	<input checked="" type="checkbox"/>
5.2 Justified	<input checked="" type="checkbox"/>
5.3 Effective	<input checked="" type="checkbox"/>

5.4 Consistent with national policy



6. Please give details of why you consider the Local Plan is or is not legally compliant, unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

Having had the opportunity to review the Publication Version of the Local Plan (consultation period 4th January to 15th February 2017), and the accompanying Proposals Map Changes, we are disappointed that further to the representations made in August 2016 by the Quantum Group (REF:475 and REF:166), the Council has not adopted the proposals contained within those representations in respect of the Former Imperial College Private Grounds in Teddington. Instead, the Council has applied a new proposed policy (LP13) to the site. It is proposed by the Council that the site be designated as "Local Green Space".

We consider that application of the new policy designation to the site is at odds with the advice in NPPF, and it is our view that the Council has not fully assessed the suitability of the site for designation as Local Green Space. We do not consider the Council has demonstrated how/why the site meets the criteria set out at paragraph 5.2.10 of the Publication version of the Local Plan (PVLN), paragraph 2.2.3 of the Proposals Map Changes for the Local Plan (PMCLP), and NPPF guidance. The Council's approach is also at odds with the views expressed by those members of the local community who attended the public consultation event organised on 8th/9th/10th December 2016, held at the Clubhouse on the Udney Park site. It was clear from the feedback gathered at that event that there is an understanding between many local people that careful and sensitive development of a small part of the site could deliver substantial and long-lasting benefits to the local community.

It is our view that the sections of the Plan that we have highlighted in Section 3 of this response form are unsound. We attach as part of our representations a report prepared by Barton Willmore titled " Former Imperial College Private Ground, Teddington, Richmond Upon Thames, Landscape and Visual Statement, February 2017", which provides a technical assessment of whether the Local Green Space proposed designation is appropriate. The conclusions of the report are clear and infatic. There is no basis on which to propose the designation of the site as Local Green Space. In summary:

1) Sustainability

Paragraph 76 of the National Planning Policy Framework (NPPF) makes clear that the identification of any land as LGS should be 'consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services'. It is our view that the identification of the Former Imperial College Private Grounds as LGS is not consistent with the local planning of sustainable development, and is as such unsound.

2) Criteria for Designation

Paragraph 77 of the NPPF states that the designation of LGS should only be used:

- 'where the green space is in reasonably close proximity to the community it serves;
- where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquility or richness of its wildlife; and

- where the green area concerned is local in character and is not an extensive tract of land.'

Paragraph 2.2.3 of the PMCLP states that the Former Imperial College Private Grounds meets all of the following criteria for its designation as LGS:

- 'The site is submitted by the local community;
- There is no current planning permission which once implemented would undermine the merit of a Local Green Space designation;
- The site is not land allocated for development within the Local Plan;
- The site is local in character and is not an extensive tract of land;
- Where the site is publicly accessible, it is within walking distance of the community; OR where the site is not publicly accessible, it is within reasonably close proximity to the community it serves;
- The Local Green Space is demonstrably special to a local community and holds a particular local significance, for example, because of its beauty, historic significance, recreational value (including as a playing field), tranquility or richness of its wildlife;
- The Local Green Space designation would provide protection additional to any existing protective policies, and its special characteristics could not be protected through any other reasonable and more adequate means.'

It is our view that the Former Imperial College Private Grounds do not meet all of the criteria for designation as listed at paragraph 77 of the NPPF (as set out in our attached report), and that its proposed designation by LBR is therefore unsound. This includes, for example, the fact that the proposed designation of the site as Local Green Space by the Teddington Society and the Friends of Udney Park Playing Fields is not representative of the views of the whole of the local community. We are aware that many of those with a local interest within the community are opposed to this designation, suggesting that the local support for the designation comes only from these two local associations that represent a small group of residents with a narrow objective in mind.

The list at paragraph 2.2.3 of the PMCLP does not correspond with the criteria for LGS designation within the NPPF, and again it is our view that the Former Imperial College Private Grounds do not meet all of the criteria, as claimed.

3) Evidence

Paragraph 5.2.8 of the PVLP states that a LGS 'is green or open space which has been demonstrated to have special qualities and hold particular significance and value to the local community which it serves'. Paragraph 2.2.3 of the PMCLP states that LBR considers that the Former Imperial College Private Grounds has been assessed, and that it fully meets the criteria for designating a LGS as listed at that same paragraph (and referred to above).

It is our view that LBR has not produced any evidence to substantiate their claim that the Former Imperial College Private Grounds meet all of these criteria, and the definition of what a LGS should be. In addition we do not believe that LBR has justified why the site requires the additional protection offered by LGS status, and why such protection is not currently afforded through the existing OOLTI and ACV designations.

Policy 7.18 of the London Plan deals with protecting open space and addressing deficiencies. The policy states, at 'D', that Boroughs should undertake audits of all forms of open space, along with assessments of need, and that these should be qualitative and quantitative. It is therefore interesting to note that the site that LBR refers to as the Udney Park Playing Fields has not been included, or

assessed within either the Open Space Assessment Report (April 2015), or the Playing Pitch Strategy Assessment Report (May 2015).

LBR published a Summary of Responses to the Pre-Publication Local Plan consultation, to which we contributed representations in August 2016, as referred to above. In response to our representation REF No. 475, relating to our proposal that a new site allocation be made for the site referred to by LBR as Udney Park Playing Fields, LBR responded that 'The Council will not allocate this site for residential/extra care accommodation or any other built development. However, the Council will designate the land as Local Green Space.' No justification or reasoning is provided to back-up LBR's decision not to allocate the site in its own right.

Please continue on a separate sheet / expand box if necessary.

7. Please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test that you have identified at Q5 above. (Note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to demonstrate how and why your change(s) will make the Local Plan legally compliant or sound. Please put forward your suggested revised wording of any policy or text or any changes to the Proposals Map. Please be as precise as possible.

It is our view that the representations made by the Quantum Group in August 2016 (REF: 475 &166) address the concerns raised above in respect of the apparent 'unsound' nature of the PVLP. Within those representations, two proposals were put forward. The first was to specifically allocated the site for development (a new site specific policy SA28 (REF:475)). The second was if the first option was not acceptable, to amend the wording of draft policy LP14 (Other Open Land of Townscape Importance (REF:166)).

Rather than repeat the full wording of the representations previously made, of which the Council is already has a record, we can summarise them as follows:

- The PVLP needs to strike an acceptable balance between meeting the future needs of its residents, including the elderly and affordable provision, and access to open space and sports and recreation facilities, whilst maintaining the character of the Borough;
- That the fundamental test in respect of any development proposals within open areas, including those on areas designated as OOLTI should be the question of whether or not the proposal will 'materially harm' the overall character or overall openness of the open land;
- That the Council should recognise the benefits of bringing forward a development scheme for the Former Imperial College Private Grounds, a site in a sustainable location, which preserves the overall townscape character for residents whilst delivering retirement/extra care accomodation to meet an important and increasing need within the community, and delivering sport and recreation facilities on

private land for the community 'in perpetuity'; and

- The Strategic Objectives of the PVLP should identify and prioritise the need to meet the accommodation and social infrastructure needs of the elderly sector of the Borough's population, particularly in relation to affordable provision. As set out in our representations (and in the attached report: Care Needs Assessment, March 2016 (Barton Willmore)), our own assessment indicates that there is a shortfall of around 986 units in the elderly care sector (see Table on p.15 of BW Report and shortfall for conventional sheltered housing (leasehold) and extra care sheltered housing).

It is our view that the Former Imperial College Private Grounds should not be designated as Local Green Space (under draft Policy LP13) , for the reasons given above (and in the attached report), and that the proposed amendment to the PMCLP relating to the 'Udney Park Playing Fields' should be removed from the draft Local Plan. We continue to support the identification of the site either as a specific site allocation for development (REF: 475) or as OOLTI (with the proposed amendments highlighted above and in our August 2016 representations (REF:166)).

As stated above, the representations made to the Council in August 2016 remain relevant (REFS: 166 & 475). The public consultation undertaken during December 2016, and the formation and active engagement with the TCSGCIC has, however, informed our thinking for the site. We propose to replace the original plan submitted in association with our August 2016 site allocation proposal (REF:475) with an updated plan, as attached. The wording of the proposed policy and supporting text remains unaltered, as set out in our REF:475. We understand the TCSGCIC is likely to make separate representations to the Local Plan.

Please continue on a separate sheet / expand box if necessary.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and the suggested change(s), as there will not normally be a subsequent opportunity to make further representations.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

It is our view that the matters for discussion in respect of the Former Imperial College Private Grounds are significant enough, and of a complexity which can only be explored further and debated around a table - with supporting written evidence. It is also our view that there is sufficient local interest in the site to warrant an open debate regarding its future.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

10. If you are not on our consultation database and you respond to this consultation, your details will be added to the database. This allows us to contact you with updates on the progression of the Local Plan and other planning policy documents. Your contact details will be shared with the Programme Officer and Inspector for the purposes of the public examination.

If you do not wish to be added to our database or you would like your details to be removed, then please tick this box, complete Part A: Personal Details of this form and return it to us as appropriate.

Signature:

For electronic responses a typed signature is acceptable.

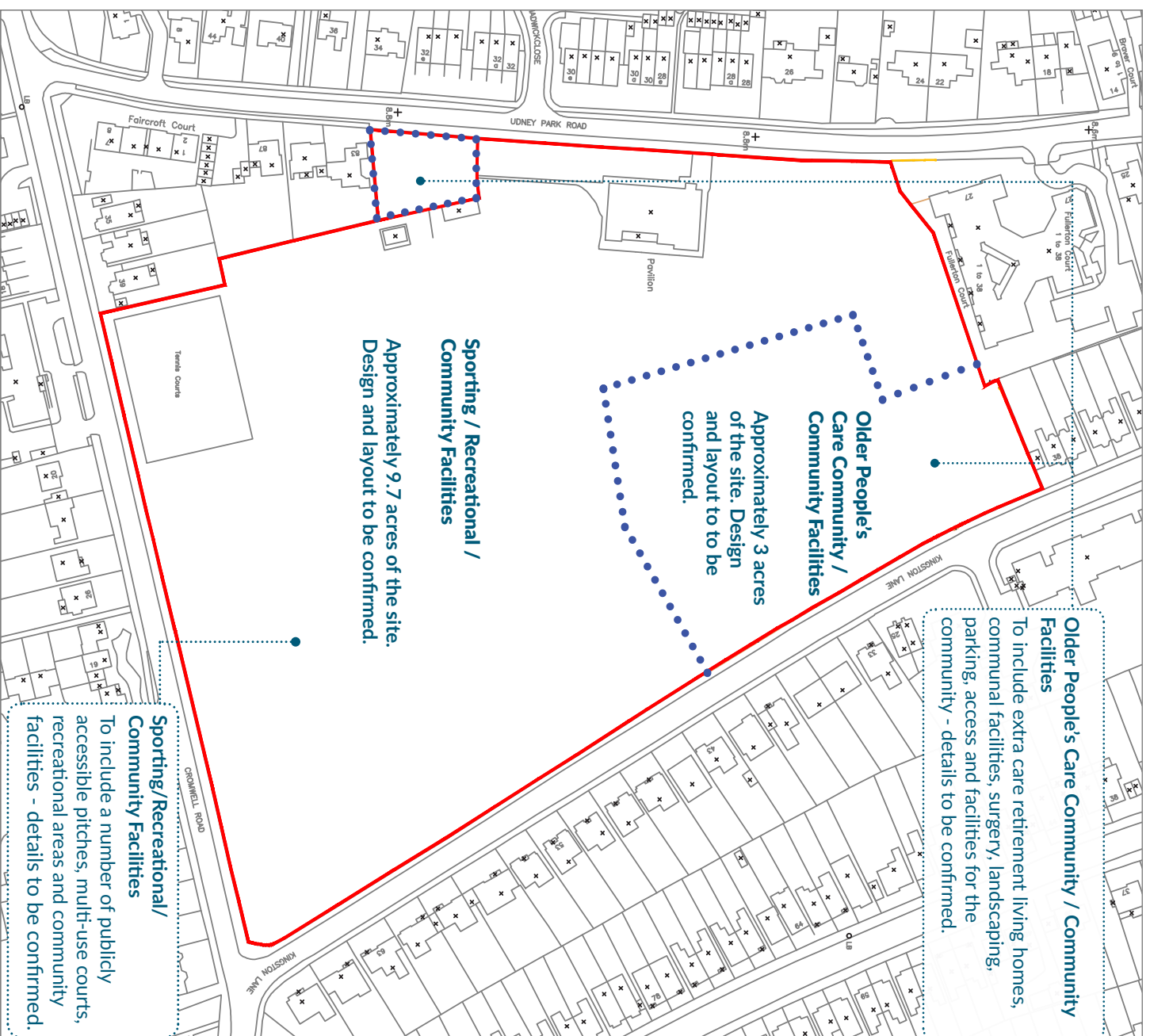
Mr Robin Meakins,
Barton Willmore LLP
(on behalf of the Quantum Group)

Date:

15th February 2017

Site plan showing ownership boundary and indicative use zones to accompany Quantum Group's Publication Consultation representation form

15th February 2017



Former Imperial College Private Ground, Teddington, Richmond Upon Thames Landscape and Visual Statement

Prepared on behalf of Quantum Group

February 2017

Former Imperial College Private Ground, Teddington, Richmond Upon Thames

Landscape and Visual Statement

Prepared on behalf of Quantum Group

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ILLUSTRATIVE MATERIAL

- **Figure 1: Landscape and Visual Context Plan**
- **Figure 2: Site Appraisal Plan**
- **Figure 3:** Site plan showing ownership boundary and indicative use zones to accompany Quantum Group’s Publication Consultation representation form
- **Figure 4:** Illustrative Proposals

APPENDICES

- Appendix 1:** Site Appraisal Photographs
Site Context Photographs

1.0 INTRODUCTION

- 1.1 Barton Willmore Landscape Planning and Design were commissioned by the Quantum Group in January 2017 to undertake a preliminary Landscape and Visual Appraisal in support of the representations promoted through the emerging London Borough of Richmond Upon Thames Local Plan for the Former Imperial College Private Ground ('The Site'), at Udney Park Road, Teddington, Richmond Upon Thames and the commission is to undertake a review of the potential designation of the Site as Local Green Space, as proposed in the London Borough of Richmond Upon Thames Local Plan Proposals Map Changes Local Plan, Publication Version for consultation 4th January 2017 – 15th February 2017.
- 1.2 As of September 2015, the Quantum Group are the freehold owners of the Site. From 1920s, up until its acquisition in 2015, the Site has been in private playing field use for various educational institutions, with access granted to a small number of specific groups occasionally and on a temporary basis.
- 1.3 The Quantum Group acquired the Site because it was substantially underutilised and presented an opportunity for proposals to be brought forward that would materially benefit residents of Teddington and beyond, whilst preserving the openness of the Site and its townscape importance.
- 1.4 The following material supports the Landscape and Visual; Appraisal:

Figure 1: Landscape and Visual Context Plan

Figure 2: Site Appraisal Plan

Figure 3: Site plan showing ownership boundary and indicative use zones to accompany Quantum Group's Publication Consultation representation form

Figure 4: Illustrative Proposals

Appendix 1: Site Appraisal Photographs
Site Context Photographs

2.0 LANDSCAPE AND VISUAL CONTEXT

Site Context

- 2.1 The Site is located within Teddington in the London Borough of Richmond Upon Thames. Teddington is situated on the northern bank of the River Thames, and extends along its High Street from the River Thames in the east to Bushey Park in the west, as illustrated on **Figure 1: Landscape and Visual Context Plan**. The Borough of Richmond Upon Thames is one of the “greenest” in London, with substantial public access to parks, gardens and squares.
- 2.2 The Site is bounded by residential development on all sides. The Site immediately adjoins Kingston Lane on its eastern boundary and Cromwell Road on its southern boundary, with large residential villas fronting on to both Kingston Lane and Commercial Road. The Site adjoins Udney Park Road for the majority of its western boundary, with smaller residential dwellings fronting onto Udney Park Road, and a cluster of residential dwellings backing onto the Site between Cromwell Road and Udney Road. Fullerton Court, a complex of over 55’s retirement apartments abuts the northern boundary of the Site.
- 2.3 Teddington High Street is located some 170 metres to the north of the Site; Teddington Railway Station is located some 250 metres to the west of the Site, on Station Road, which is a continuation of Cromwell Road.

Topography and Hydrology

- 2.4 Teddington and the Site are located in the valley floor of the River Thames. The River Thames is located some 515 metres to the east of the Site. The surrounding landform is predominantly flat, at approximately 9.0 metres AOD, as characteristic of the river valley floor, and as shown on **Figure 1: Landscape and Visual Context Plan**.

Settlement, Open Space and Vegetation

- 2.5 Teddington forms part of the extensive conurbation of south-west London, surrounded by and contiguous with Strawberry Hill, Ham, Hampton Hill and Hampton, in the immediate locality. Teddington is predominantly residential, with its character defined by Victorian terraces, Edwardian detached and semi-detached houses, and mid-rise modern residential development; and few tall buildings.
- 2.6 The extensive swathe of south west London is punctuated by substantial tracts of parkland and open space, such as Richmond Park; Ham House Gardens and Grounds; Bushy Park; Hampton Court and Hampton Court Park; and that associated with the River Thames and River Crane; as well as numerous golf courses.

2.7 Substantial vegetation, both formal and naturalistic in character occurs within the parklands, open space and golf courses. Within the settlement, vegetation is predominantly street trees and within gardens.

Public Access

2.8 The Site is private land with no public access.

Landscape Planning Context

2.9 The relevant Landscape Planning Policy Context, for the Site includes landscape and visual related policies set out in:

- National Planning Policy Framework (March 2012) (NPPF)
- The London Plan (2016)

2.10 London Borough of Richmond Upon Thames Local Development Framework: Development Management Plan Adopted November 2011

- London Borough of Richmond Upon Thames Supplementary Planning Document: Design Quality (Adopted February 2006)
- London Borough of Richmond Upon Thames Local Plan, Publication version for consultation 4th January 2017 – 15th February 2017
- London Borough of Richmond Upon Thames Local Plan Proposals Map Changes Local Plan, Publication Version for consultation 4th January 2017 – 15th February 2017

National Planning Policy Framework

2.11 In summary, National planning policy, as set out in the National Planning Framework (NPPF), promotes sustainable development, including the consideration of the economic, social and environmental role proposed development would contribute, both in terms of potential benefits and harm. The Site does not currently fall within any areas covered by policies within the NPPF, as set out in Footnote 9 of Paragraph 14, that would restrict the presumption in favour of sustainable development, subject to complying with and meeting the criteria of Paragraph 14.

2.12 The London Borough of Richmond Upon Thames Proposals Map Changes Local Plan, publication version for consultation 4th January 2017 – 15th February 2017, proposes that the Site is designated as Local Green Space, which is a designation that falls within Footnote 9 of Paragraph 14 of the NPPF. Paragraph 77 of the NPPF addresses Local Green Space, setting out that:

"The Local Green Space designation will not be appropriate for most green areas or open space. The designation should only be used:

- *where the green space is in reasonably close proximity to the community it serves;*
- *where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and*
- *where the green area concerned is local in character and is not an extensive tract of land."*

2.13 Paragraph 78 also notes that:

"Local policy for managing development within a Local Green Space should be consistent with policy for Green Belts."

2.14 National planning policy also seeks to provide protection for the intrinsic character and beauty of the countryside and the natural environment; and the protection and enhancement of valued landscapes. Policy also seeks to ensure that new development is of high quality design; responds to local character and history, and local distinctiveness; includes for the provision of Green Infrastructure; and that it establishes a strong sense of place to create attractive and comfortable places in which to live, work and visit.

London Borough of Richmond Upon Thames Local Development Framework: Development Management Plan (Adopted November 2011)

2.15 Within the adopted Development Management Plan, the Site is allocated, under Policy DM OS 3, as "Other Open Land of Townscape Importance". Policy DM OS 3 states that:

"Other Open Land of Townscape Importance

Other open areas that are of townscape importance will be protected and enhanced in open use.

It will be recognised that there may be exceptional cases where appropriate development is acceptable. The following criteria must be taken into account when assessing appropriate development:

1. It must be linked to the functional use of the Other Open Land of Townscape Importance; or

2. It can only be a replacement or minor extension of existing built facilities;

3. In addition to 1. or 2., it does not harm the character and openness of the open land.

Improvement and enhancement of the openness and character of other open land and measures to open up views into and out of designated other open land will be encouraged where appropriate.

When considering developments on sites outside designated other open land, any possible visual impacts on the character and openness of the designated other open land will be taken into account."

2.16 The supporting text to Policy DM OS 3 sets out that:

"4.1.6 Other Open Land of Townscape Importance (OOLTI) can include public and private sports grounds, school playing fields, cemeteries, allotments, private gardens, areas of vegetation such as street verges and mature trees. The designated areas are shown on the Proposals Map but there will also be other areas which could be considered as being of local value to the area and townscape which merit protection.

4.1.7 In some parts of the borough, open areas, including larger blocks of back gardens, which are not extensive enough to be defined as green belt or metropolitan open land, act as pockets of greenery of local rather than London-wide significance. Many of these are of townscape importance, contributing to the local character and are valued by residents as open spaces in the built up area. Policy DM HO 2 'Infill Development' and Policy DM HO 3 'Backland Development' also recognise the importance of gardens, which will be considered as greenfield sites. Green oases are particularly important and will be protected in areas of high density development and town centres.

4.1.8 OOLTI should be predominantly open or natural in character. The following criteria are taken into account in defining OOLTI:

- **Contribution to the local character and/or street scene, by virtue of its size, position and quality.**
- **Value to local people for its presence and openness.**
- **Immediate or longer views into and out of the site, including from surrounding properties.**
- **Value for biodiversity and nature conservation.**

Note that the criteria are qualitative and not all need to be met.

4.1.9 The purpose of this policy is to safeguard this open land and ensure that it is not lost to other uses without good cause. Protecting and opening up views into and out of designated other open land is encouraged because of the contribution to the distinctive character of an area and the benefits to all. Where a

comprehensive approach to redevelopment can be taken, such as on major schemes or regeneration proposals, or for social community or educational uses, it may be acceptable to re-distribute the open land within the site, providing that the new open area is equivalent or improved in terms of size, shape, location, quality and potential ecological value.

London Borough of Richmond Upon Thames Local Plan, Publication version for consultation, 4th January 2017 – 15th February 2017

- 2.17 The London Borough of Richmond Upon Thames Local Plan, Publication Version, at Paragraph 5.2, sets out the policy for Green Belt, Metropolitan Open Land and Local Green Space, under Policy LP 13, which states that, with specific reference to Local Green Space:

"Policy LP 13

Local Green Space

D. Local Green Space, which has been demonstrated to be special to a local community and which holds a particular local significance, will be protected from inappropriate development that could cause harm to its qualities.

- 2.18 Paragraphs 5.2.8 to 5.2.10 provide supporting text with regard to Policy LP13, with specific regard to Local Green Space, as set out below:

"5.2.8 Local Green Space, as identified on the Proposals Map, is green or open space which has been demonstrated to have special qualities and hold particular significance and value to the local community which it serves.

5.2.9 In line with the NPPF, managing development within a Local Green Space should be consistent with policy for Green Belt. Development, which would cause harm to the qualities of the Local Green Space, will be considered inappropriate and will only be acceptable in very special circumstances where benefits can be demonstrated to significantly outweigh the harm.

5.2.10 The following criteria are taken into account when defining Local Green Space:

- *The site is submitted by the local community;*
- *There is no current planning permission which once implemented would undermine the merit of a Local Green Space designation;*
- *The site is not land allocated for development within the Local Plan;*
- *The site is local in character and is not an extensive tract of land;*
- *Where the site is publicly accessible, it is within walking distance of the community; OR where the site is not publicly*

accessible, it is within reasonably close proximity to the community it serves;

- *The Local Green Space is demonstrably special to a local community and holds a particular local significance, for example, because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife;*
- *The Local Green Space designation would provide protection additional to any existing protective policies, and its special characteristics could not be protected through any other reasonable and more adequate means.*

2.19 With regard to the Proposals Map Changes for Publication Local Plan, the changes include designating the Site (given the title in the emerging Local Plan as Udney Park Playing Fields) as Local Green Space, as set out in Section 2.2: Local Green Space, and with reference to Paragraphs 2.2.1 to 2.2.3. The justification for the designation is set out in Paragraphs 2.2.2 to 2.2.3, and states:

"Reason for Local Green Space Designation

2.2.2 Udney Park Playing Fields are already designated as Other Open Land of Townscape Importance (OOLTI) and also benefit from a designation as an Asset of Community Value.

2.2.3 Policy LP 13 Green Belt, Metropolitan Open Land and Local Green Space sets out the policy guidance in relation to Local Green Space, including criteria for designation. The Council has assessed the site against the criteria as set out in the Publication Local Plan policy as well as national guidance, and considers that it meets all of the following criteria:

- *The site is submitted by the local community;*
- *There is no current planning permission which once implemented would undermine the merit of a Local Green Space designation;*
- *The site is not land allocated for development within the Local Plan;*
- *The site is local in character and is not an extensive tract of land;*
- *Where the site is publicly accessible, it is within walking distance of the community; OR where the site is not publicly accessible, it is within reasonably close proximity to the community it serves;*
- *The Local Green Space is demonstrably special to a local community and holds a particular*
- *local significance, for example, because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife;*
- *The Local Green Space designation would provide protection additional to any existing protective policies, and its special characteristics could not be protected through any other reasonable and more adequate means."*

- 2.20 The London Borough of Richmond Upon Thames Local Plan, Publication Version, retains a policy for designating Other Open Land of Townscape Importance, in the amend form of Policy LP 14, which sets out that:

"Other Open Land of Townscape Importance

Other open areas that are of townscape importance will be protected in open use, and enhanced where possible.

It will be recognised that there may be exceptional cases where appropriate development is acceptable. The following criteria will be taken into account when assessing whether development is appropriate:

a. it must be linked to the functional use of the Other Open Land of Townscape Importance;

or

b. it can only be a replacement of, or minor extension to, existing built facilities; and

c. it does not harm the character or openness of the open land.

Improvement and enhancement of the openness or character of other open land and measures to open up views into and out of designated other open land will be encouraged.

When considering developments on sites outside designated other open land, any possible visual impacts on the character and openness of the designated other open land will be taken into account."

- 2.21 Paragraphs 5.3.1 to 5.3.7 provide the supporting text to Policy LP14, setting out that:

"5.3.1 The purpose of this policy is to safeguard open land of local importance and ensure that it is not lost to other uses without good cause. Areas designated as Other Open Land of Townscape Importance (OOLTI) form an important part of the multi-functional network of Green Infrastructure and they can include public and private sports grounds, school playing fields, cemeteries, allotments, private gardens, areas of vegetation such as street verges and mature trees. The designated areas are shown on the Proposals Map.

5.3.2 In some parts of the borough, open areas, including larger blocks of back gardens, act as pockets of greenery of local rather than strategic significance. Many of these are of townscape

importance, contributing to the local character and are valued by residents as open spaces in the built up area. Green oases are particularly important in areas of higher density development including in the borough's centres.

5.3.3 This policy can also apply to other open or natural areas that are not designated, but which are considered to be of local value, and therefore merit protection.

5.3.4 OOLTI should be predominantly open or natural in character. The following criteria are taken into account when defining OOLTI (note that the criteria are qualitative and not all need to be met):

- *Contribution to the local character and/or street scene, by virtue of its size, position and quality.*
- *Value to local people for its presence and openness.*
- *Immediate or longer views into and out of the site, including from surrounding properties.*
- *Contribution to a network of green spaces and green infrastructure as set out in policy LP12 in 5.1 'Green Infrastructure'.*
- *Value for biodiversity and nature conservation.*

5.3.5 This policy can also apply to other open or natural areas that are not designated, but which are considered to be of local value in line with the criteria set out above, and therefore merit protection.

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

5.3.7 Protecting and opening up views into and out of designated OOLTI is encouraged because of the contribution they can make to the distinctive character of an area and the benefits to all."

London Borough of Richmond Upon Thames Supplementary Planning Document: Design Quality (Adopted February 2006)

- 2.22 The London Borough of Richmond Upon Thames Supplementary Planning Document: Design Quality provides the overall context for design guidance in the London Borough of Richmond. It notes that this guidance should be "***taken into account when designing individual buildings, groups of buildings, redevelopment and infill schemes, extensions and even minor building works***". The guidance is intended to guide quality and provides an

assessment of the character of the Borough, to assist in defining the broader setting and environmental qualities of a site.

2.23 The guidance sets out objectives for the delivery of high quality design and development, covering:

- Character
- Continuity and Enclosure
- Public Realm
- Ease of Movement
- Legibility
- Adaptability; and
- Diversity.

3.0 TOWNSCAPE CHARACTER

3.1 The assessment of landscape or townscape character involves a descriptive approach that seeks to identify and define the distinct character of landscapes and townscapes that make up the country. In accordance with the European Landscape Convention this approach recognises the intrinsic value of all landscapes, not just 'special' landscapes, as contributing factors in people's quality of life. It also ensures that account is taken of the different roles and character of different areas, in accordance with the NPPF Core Principles.

3.2 The description of each landscape or townscape character area is used as a basis for evaluation to make judgements to guide, for example, development or landscape management.

3.3 The Site is set entirely within the immediately surrounding townscape context, and is surrounded by and contained by residential development on all sides. The relevant published townscape character assessment is:

- London Borough of Richmond Supplementary Planning Document: Design Quality (Adopted 2006)

London Borough of Richmond Supplementary Planning Document: Design Quality (Adopted 2006)

3.4 With regard to the urban form and Character Areas of the Borough, the guidance notes that the

"The environmental Character of the Borough since its nineteenth century expansion has resulted in a group of urbanised areas, connecting former villages, divided by open space, linked by roads and interwoven by railways."

3.5 Twelve distinctive character areas have been identified, ***"defined by their cohesive identity, or location of both natural and manmade barriers such as the river, open space and the railways"***.

3.6 The Site falls on the southern edge of the Strawberry Hill and Teddington East Character Area, and immediately adjoins the Hampton Wick and South Teddington Character Area, as illustrated on **Figure 1: Landscape and Visual Context Plan**, with the Hampton Hill and Teddington West Character Area located to the west of the Site.

3.7 The Strawberry Hill and Teddington East Character Area, which includes the Site and extends east to the River Thames, is described as:

"A suburban character area less tightly developed than Twickenham with small pockets of open space and large gardens with a significant number of trees. Teddington High Street Retains a mix of attractive Victorian and Edwardian shopping parades (some with original shop fronts) and Artisan Cottages in small side streets. Strawberry Hill House and Grounds exhibit an exuberant Gothic style. The Strawberry Hill residential area is leafy and contains a mix of large older homes and twentieth century infill houses and flats."

- 3.8 The Hampton Wick and South Teddington Character Area extends south from the Site, south of Cromwell Road and east to the River Thames, and is described as:

"The old village centre of Hampton Wick has a strong village character through uniform building styles and narrow winding streets. South of the railway line development is mostly Georgian, Victorian and Edwardian and small in scale with a tree lined backdrop relating to Hampton Court. North of the railway line there is more variation in style and age of residential development. Houses to Lower Teddington Road and the River [Thames] are more substantial in scale and there are a number of modern residential apartment blocks."

- 3.9 The Hampton Hill and Teddington West Character Area is located to the west of the Site, adjoining the rear gardens of residential properties on the west side of Udney Park Road which adjoins the Site, with a clear change in pattern of residential development. The Hampton Hill and Teddington West Character Area is described as:

"Hampton Hill High Street maintains its village character, composed of Victorian shops (converted from cottages), some listed houses, a picturesque backdrop of trees from Bushy Park and a pleasant arrangement of neighbouring residential streets. Most of the area is residential with a predominantly Victorian and Edwardian character of uniform semi-detached homes in avenues of mature trees. There are also many pockets of modern designed terraced housing and flats arranged in courts and parklands with a high standard of landscape quality."

4.0 LANDSCAPE AND VISUAL APPRAISAL OF THE SITE

Site Appraisal

- 4.1 The Site is illustrated on **Figure 2: Site Appraisal Plan**, and in **Site Appraisal Photographs A, B, C and D**.
- 4.2 The Site is 12.8 acres in size and of relatively regular shape, and is bound by roads and residential development on all sides.
- 4.3 It comprises predominantly formal playing fields and tennis courts, with a club house and several ancillary structures such as viewing seating, two vehicular accesses, associated parking and one designated pedestrian entrance.
- 4.4 All vegetation, with the exception of the amenity playing field grassland, is limited to intermittent tree and hedge or shrub planting along the perimeter of the Site and around the parking area. The Site is otherwise devoid of any noteworthy natural features.

Visual Appraisal

- 4.5 The visual context of the Site and its surroundings is illustrated by **Site Context Photographs 1 - 4**, the locations of which are shown on **Figure 1: Landscape and Visual Context Plan**.
- 4.6 A visual appraisal of the Site and its environs was undertaken in February 2017, to determine the relationship of the Site with its surroundings, and the visibility of the Site within the wider landscape and townscape.
- 4.7 The visibility of any site is predominantly influenced by its landform and the extent and type of vegetation cover and built elements within a site and the surrounding landscape or townscape. The combination of the flat topography and immediately surrounding existing residential development result in the Site being visible from only the immediate vicinity, and therefore the visual appraisal has been undertaken from publicly accessible viewpoints from the roads immediately surrounding the Site, to determine the approximate extent from which the Site is visible from the eye of a person standing on the ground. There is, in most visual appraisals, a continuum of degrees of visibility ranging from no view of a site to full, open views. To indicate the degree of visibility of the Site from the surrounding locality, three categories of visibility have been used in this assessment:
- a) Open view: A clear view of a significant proportion of the Site within the wider landscape or townscape.

- b) Partial view: A view of part of the Site or a filtered view of the Site, or a distant view in which the Site is perceived as a small part of the view; and
- c) Truncated / No view: Views towards the Site are curtailed by visual barriers, such as intervening topography, vegetation or built forms.

4.8 **Site Context Photographs Nos. 1 – 4** illustrate a representative selection of views of the Site from the immediate surrounding area, the locations for which are identified on **Figure 1: Landscape and Visual Context Plan**.

4.9 Much of the boundary of the Site is enclosed by close board timber fencing or built form (71% of the length of the boundary), such that views into the Site from ground level are extremely limited, being predominantly truncated, and are limited to partial views or glimpses through lengths of the boundary with railings and hedging, or railing and trees, even in winter, when the vegetation is devoid of foliage.

4.10 **Site Context Photographs 1 and 2** demonstrate the enclosure provided by the boundary fencing and in some locations adjoining residential development, resulting in limited (truncated) views and limited appreciation of the playing fields, from the immediately surrounding roads and footways as experienced by pedestrians and motorists.

4.11 **Site Context Photographs 3 and 4** demonstrate the brief lengths of more open boundary treatment, of railings and boundary vegetation. Where the boundary treatment is more open, there are partial views of the playing fields seen through the railings and boundary vegetation.

4.12 With the exception of from the first and upper floors of immediately surrounding residential development, there are no open views into the playing fields, and no available views of the whole Site.

5.0 CONSIDERATION OF POTENTIAL ALLOCATION AS LOCAL GREEN SPACE

Consideration of Policy Context

5.1 In assessing the Site against the policy requirements for a Local Green Space as set out in the NPPF, the NPPF states that the designation should only be used:

- *where the green space is in reasonably close proximity to the community it serves;*
- *where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and*
- *where the green area concerned is local in character and is not an extensive tract of land."*

5.2 With regard to the proximity to the community it serves, firstly, the Site is not publicly accessible, and is used by several sports clubs with the express consent of the landowner and on a temporary basis. The Site is therefore used by only relatively small sector of the local community, for limited periods of time on a temporary basis, therefore, whilst surrounded by local residents, it currently only serves, and is accessible to, a very small part of the local community and not permanently, and is therefore limited in the extent to which it "serves" the community.

5.3 With regard to being "demonstrably special", it is valued insofar as it is an open space within the suburban context of the surrounding settlement, nothing more.

5.4 However, as demonstrated by the Landscape and Visual Appraisal, the appreciation of that openness is very restricted, both by the lack of public accessibility, and by the enclosed nature of much of the boundary treatment.

5.5 In terms of its local significance, recreational value and amenity is very restricted.

5.6 Furthermore, comprising featureless amenity grassland, with no noteworthy landscape features, the Site has no attributes that contribute to "beauty".

5.7 Whilst it has been in private recreational use for many decades, this has always been in private, related use, which does not expressly constitute 'historical significance', particularly when compared with other parks and open spaces in the locality, such as the likes of Bushey Park, Hampton Court, Ham House and Richmond Park which demonstrate "historical significance" (although knowledgably these are of too greater extent to be 'Local Green Space'). There are

several buildings of Townscape Merit, on Udney Park Road and Teddington High Street, however these are not directly related to the Site. Therefore, it is apparent that the Site exhibits limited 'historical significance'.

- 5.8 The Site also exhibits very limited recognised aspects of tranquillity, being surrounded by roads and development on all sides, with no sense of remoteness, and influenced by suburban development on all sides, including noise, and lighting. It does provide some relief from the density of the surrounding suburban development, but this is not readily appreciated from much of the surrounding area. It is not utilised for informal recreation, as use is limited to those sports clubs that have the express consent by the landowner for use on a temporary basis, such that it would not be readily experienced as a green space providing relief from the sub-urban environment.
- 5.9 With regard to richness of its wildlife, the Site exhibits very limited habitat diversity or wildlife richness, being predominantly uniform amenity playing field grassland, with any limited habitat variety restricted to very narrow margins on the boundaries of the Site.
- 5.10 Therefore, the Site in its current condition and use, with its current level of accessibility, and lack of "beauty, historic significance, tranquillity and any richness in wildlife" only very partially meets the NPPF requirements for the designation of Local Green Space.
- 5.11 In considering the Site against the policy requirements for Local Green Space Designation, as set out in the Publication Version of the emerging London Borough of Richmond Upon Thames Local Plan, the criteria to be taken into account when defining Local Green Space is set out in Paragraph 5.2.10, and sets out that:
- ***"The site is submitted by the local community;***
 - ***There is no current planning permission which once implemented would undermine the merit of a Local Green Space designation;***
 - ***The site is not land allocated for development within the Local Plan;***
 - ***The site is local in character and is not an extensive tract of land;***
 - ***Where the site is publicly accessible, it is within walking distance of the community; OR where the site is not publicly accessible, it is within reasonably close proximity to the community it serves;***
 - ***The Local Green Space is demonstrably special to a local community and holds a particular local significance, for example, because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife;***
 - ***The Local Green Space designation would provide protection additional to any existing protective policies, and its special characteristics could not be protected through any other reasonable and more adequate means."***

- 5.12 Notably, the first three criteria are additional to the criteria set out in the NPPF, and are not specific to the character, use and function of Local Green Space, which is the general focus of the NPPF criteria. As set out in the first criteria, whilst the Site may have been submitted by two local groups (which may be considered as not representative of the wider community, as evidenced by the creation of the CIC which is supportive of the proposals for the site) for a Local Green Space designation, this is not necessarily a commendation per se for the designation of the Site as Local Green Space, as the NPPF sets out the type of characteristics that demonstrate being of local significance or special to a local community, for example because of its beauty, historic significance, recreational value (to that community), tranquillity or richness in its wildlife. It is more to do with seeking to stop any development of the Site from occurring.
- 5.13 With regard to the second and third criteria, whilst there is no current planning permission which once implemented would undermine the merit of a Local Green Space designation, and the land is not presently allocated for development, this does not relate to the merits of the Site in terms of its suitability for Local Green Space, with again regard to character, use and function.
- 5.14 The fourth, fifth and sixth criteria reflect the criteria for Local Green Space designation as set out in the NPPF, and as established above, the Site only very partially meets with the requirements for Local Green Space designation.
- 5.15 With regard to the final criteria, the Site is currently designated as "Other Open Land of Townscape Importance" as defined by Policy DM OS 3 of the adopted London Borough of Richmond Upon Thames Local Plan, and this policy is retained in the emerging Publication Version London Borough of Richmond Upon Thames Local Plan, as Policy LP 14: Other Open Land of Townscape Importance. This policy provides protection for the spatial character of the townscape of the borough, in particular to maintain predominantly open or natural areas, including areas that are of "value to local people for its presence and openness". Considering the current character, function and use of the Site, not what is proposed by the Quantum Group and the Teddington Sports Ground CIC in their representations to the Local Plan, this is an appropriate policy to afford protection of important open land within in areas of dense suburban development, and when considering the Site in the context of the criteria for Other Open Land of Townscape Importance, and the supporting text of the policy. Paragraph 4.1.8 of the adopted Local Plan sets out the criteria for Other Open Land of Townscape Importance as:
- ***"Contribution to the local character and/or street scene, by virtue of its size, position and quality.***
 - ***Value to local people for its presence and openness.***

- *Immediate or longer views into and out of the site, including from surrounding properties.*
- *Value for biodiversity and nature conservation.*

Note that the criteria are qualitative and not all need to be met."

5.16 Paragraph 5.3.4 sets out the criteria for Other Open Land of Townscape Importance, which in addition to the above includes the following criterion:

- *"Contribution to a network of green spaces and green infrastructure as set out in policy LP12 in 5.1 'Green Infrastructure'."*

5.17 Importantly, to be designated Other Open Land of Townscape Importance, public access and recreational value are not required qualities, and therefore the Site is more compliant with the overall criteria for Other Open Land of Townscape Importance, as set out in both the adopted and the emerging Local Plan, than that for the designation of Local Green Space.

5.18 Of note is supporting text which sets out the purpose of Policy DM OS 3, and ways that such Other Open Land of Townscape Importance can be enhanced:

4.1.9 The purpose of this policy is to safeguard this open land and ensure that it is not lost to other uses without good cause. Protecting and opening up views into and out of designated other open land is encouraged because of the contribution to the distinctive character of an area and the benefits to all. Where a comprehensive approach to redevelopment can be taken, such as on major schemes or regeneration proposals, or for social community or educational uses, it may be acceptable to re-distribute the open land within the site, providing that the new open area is equivalent or improved in terms of size, shape, location, quality and potential ecological value."

5.19 Likewise, similar supporting text is set out in the emerging Local Plan, at paragraphs 5.3.1, 5.3.6 and 5.3.7, setting out that:

"5.3.1 The purpose of this policy is to safeguard open land of local importance and ensure that it is not lost to other uses without good cause. Areas designated as Other Open Land of Townscape Importance (OOLTI) form an important part of the multi-functional network of Green Infrastructure and they can include public and private sports grounds, school playing fields, cemeteries, allotments, private gardens, areas of vegetation such as street verges and mature trees. The designated areas are shown on the Proposals Map.

5.3.6 Where a comprehensive approach to redevelopment can be taken, such as on major schemes or regeneration proposals, or for community and social infrastructure including educational uses, it may be acceptable to re-distribute the designated open

land within the site, provided that the new open area is equivalent or improved in terms of quantum, quality and openness.

5.3.7 Protecting and opening up views into and out of designated OOLTI is encouraged because of the contribution they can make to the distinctive character of an area and the benefits to all."

5.20 With regard to the final criteria for Local Green Space, the existing character of the Site can be adequately and reasonably protected by both the existing adopted Policy DM OS 3 and the emerging Policy LP14 with regard to Other Open Land of Townscape Importance. Furthermore, as set out in Policy L 13 Paragraph, to be designated as Local Green Space, it must be demonstrated that a green or open space has special qualities and holds a particular significance and value to the community it serves. However, as set out above, the Site has limited special qualities, more aligned with its designation as Other Open Land of Townscape Importance, and is very limited in the extent to which it "serves" the community, and therefore the additional protection of a Local Green Space designation is neither appropriate nor necessary.

6.0 CONSIDERATION OF POTENTIAL ENHANCEMENTS TO THE SITE

6.1 As set out in the Representations to the Local Plan for the Site, made by Quantum Group and the Teddington Community Sports Ground CIC, the aspirations for the Site are to deliver enhanced sporting and community facilities, new public open space, and care-led accommodation for the elderly with publicly accessible healthcare services. The key benefits of which would be:

- Significant new public open space (gifted to the CIC as custodians of the Community) to enrich the life, health and wellbeing of residents and visitors;
- Enhanced play and sporting opportunities for all ages and abilities, including provision of a 3G pitch;
- Space for local groups and community activities;
- Modern, multi-use facilities to meet the needs of local clubs;
- Affordable housing solutions for the elderly population;
- Employment opportunities;
- Enhanced biodiversity and habitat creation; and
- A sustainable legacy for future generations.

6.2 In addition, the proposals would increase the appreciation of the openness of the Site, with increased views into and out of the Site, achieved through the replacement of much of the close board fencing with open railings, to increase the visual permeability of the Site. The increase of availability of views from within the Site would be delivered through the provision of public access.

Contribution to Other Open Land of Townscape Importance

6.3 As demonstrated, the existing character of the Site can be adequately and reasonably protected by both the existing adopted Policy DM OS 3 and the emerging Policy LP 14, with regard to Other Open Land of Townscape Importance, and that additional protection of a Local Green Space designation is neither appropriate nor necessary.

6.4 In this context, on consideration of the proposals for the Site, as promoted by the Quantum Group and the Teddington Sports Ground CIC, as illustrated on the attached plans, the proposals offer real enhancements to the Other Open Land of Townscape Importance, in accordance with the policy objectives set out in both the existing adopted Policy DM OS3 and the emerging Policy LP 14.

- 6.5 Whilst the proposals would result in a small reduction in overall open space, the comprehensive approach to the redevelopment of the Site would result in an acceptable re-distribution of open land within the Site, such that there would be a significant increase in publicly accessible open land, in terms of publicly accessible informal and formal open space and sports pitch provision, to be enjoyed by immediately adjoining residents and visitors.
- 6.6 The accessible open space would also be of an improved quality; through the range of function and use, that is through the provision of informal public open space, a Multi-Use Games Area (MUGA), children's play area and higher quality pitch provision allowing for greater flexibility and intensity of use; through creation of more natural areas associated with the informal public open space with enhanced biodiversity and nature conservation value; and with an improvement to the landscape and visual character, through tree planting and landscape proposals to introduce variety and interest.
- 6.7 The proposals for the Site would result in the Site making a greater positive contribution to the surrounding townscape; providing an enhancement to the local character and street scene through the increased visibility of the Site, and greater diversity in character across the Site; and continuing to perform its function as a valued open space within the built up area, with a greater appreciation of the open nature of the Site from surrounding residents.
- 6.8 The proposals for the Site would also result in the Site making a greater contribution to the multi-functional network of surrounding Green Infrastructure, with increased access and permeability across the Site creating linkages with the surrounding area.
- 6.9 The proposals for the Site would therefore result in an "enhancement of the openness and character of the open land", and would "open up views into and out of the open land", as encouraged by both adopted Policy DM OS 3 and emerging Policy LP 14.
- 6.10 The proposals for the Site would increase the attributes of the Site that contribute to its designation as Other Open Land of Townscape Importance in terms of the criteria set out in Paragraph 4.1.8 of adopted Policy DM OS 3, as follows:
- ***"Contribution to the local character and/or street scene, by virtue of its size, position and quality.***
 - ***Value to local people for its presence and openness.***
 - ***Immediate or longer views into and out of the site, including from surrounding properties.***
 - ***Value for biodiversity and nature conservation."***
- 6.11 Furthermore, the proposals for the Site would also increase the contribution that the Site makes to the network of green spaces and green infrastructure, with regard to the additional criterion, in addition to the above, set out in Paragraph 5.3.4 of emerging Policy LP 14:

- ***"Contribution to a network of green spaces and green infrastructure as set out in policy LP12 in 5.1 'Green Infrastructure'."***

6.12 The proposals for the Site would therefore not only "not harm the character and openness of the open land", in accordance with the requirements set out in both adopted Policy DM OS 3 (Point 3) and emerging Policy LP14 (Point C), but would enhance the character and openness of the open land, resulting in the Site making a greater contribution to the function and objectives of designated Other Open Land of Townscape Importance.

Contribution to Local Green Space

6.13 As demonstrated, the Site in its current condition and use, with its current level of accessibility, and lack of "beauty, historic significance, tranquillity and any richness in wildlife" only very partially meets the NPPF Paragraph 78 requirements for the designation of Local Green Space, as set out below:

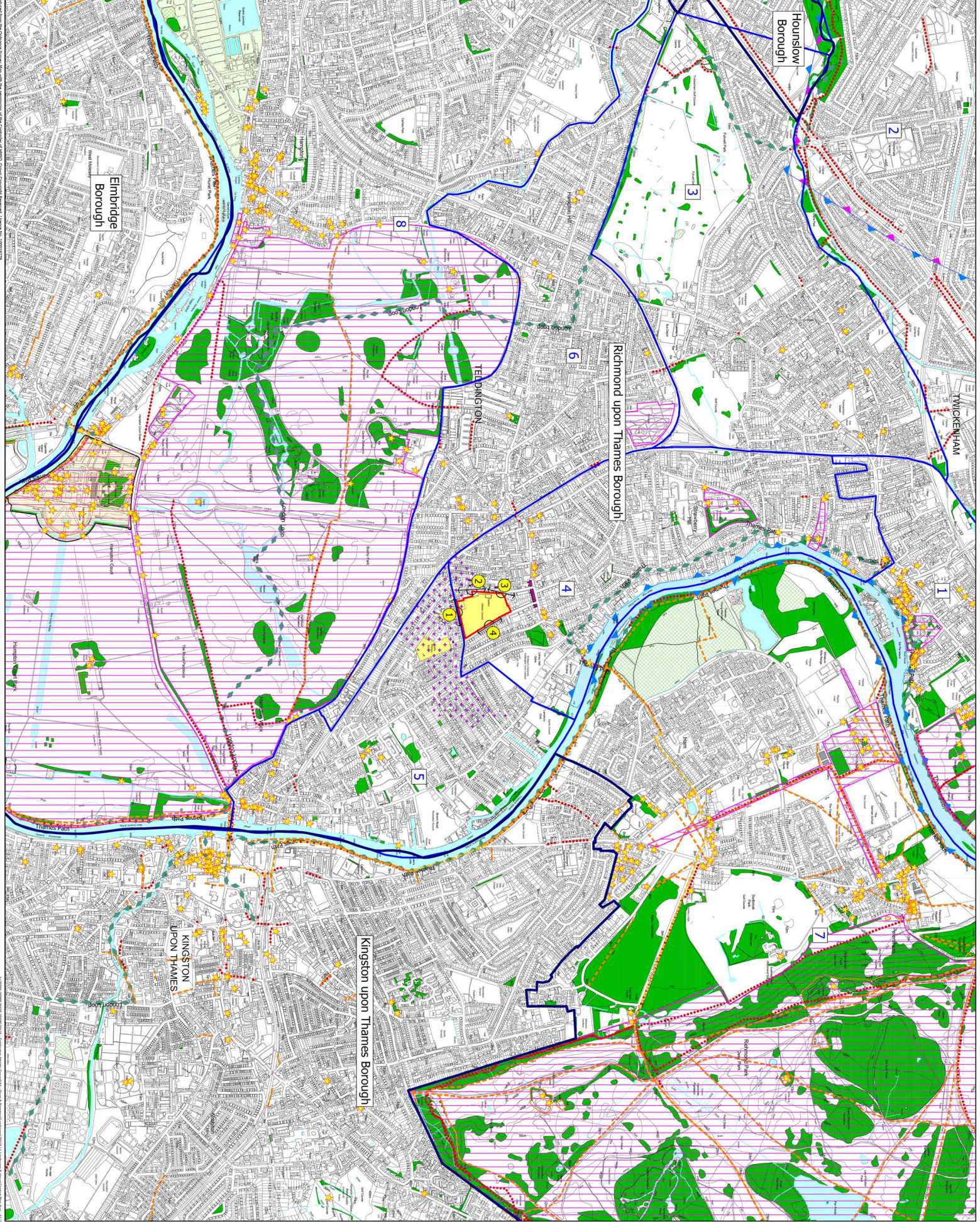
- ***where the green space is in reasonably close proximity to the community it serves;***
- ***where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and***
- ***where the green area concerned is local in character and is not an extensive tract of land."***

6.14 Likewise, with regard to fourth, fifth and sixth criteria of Paragraph 5.2.10 of emerging Policy LP 13, addressing Local Green Space, the Site only very partially meets with the requirements for Local Green Space designation, as set out below:

- ***"... The site is local in character and is not an extensive tract of land;***
- ***Where the site is publicly accessible, it is within walking distance of the community; OR where the site is not publicly accessible, it is within reasonably close proximity to the community it serves;***
- ***The Local Green Space is demonstrably special to a local community and holds a particular local significance, for example, because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife;..."***

6.15 The Site has limited special qualities, more aligned with its designation as Other Open Land of Townscape Importance, and is very limited in the extent to which it "serves" the community, and therefore the additional protection of a Local Green Space designation is neither appropriate nor necessary.

- 6.16 However, should the Site be designated as Local Green Space, the proposals for the Site would provide significant benefits, such that the Site would provide a wide range of accessible informal and formal public open space, immediately adjoining the local community that it would then serve; with an increase in local significance by creating an attractive accessible green space of greater beauty, recreational value and richness of wildlife.
- 6.17 Therefore, the proposals for the Site, as promoted by the Quantum Group and the Teddington Community Sports Ground CIC, if implemented, would be consistent with the allocation of the Site as a Local Green Space designation, should the Site be designated as such, and would therefore not conflict with the second criteria of Paragraph 5.2.10 of emerging Policy LP 13. The proposals for the Site would therefore contribute to the "very special circumstances where benefits can be demonstrated to significantly outweigh the harm", as set out in Paragraph 5.2.9 of Policy LP 13 of the emerging Local Plan.



The scaling of this drawing cannot be used. Dm 03d

LEGEND

- Existing Woodlands, Closes and Tree Belts
- Existing Scrub
- Existing Water Courses and Features
- Contour/Spot Heights (Mere AOD)
- Local Planning Authority Boundary
- Registered Parks and Gardens
- Listed Buildings
- Scheduled Monument
- Other Open Land of Townscape Importance
- New Pools Provided with Public Open Space
- Buildings of Townscape Merit
- National Character Area Profile #
- New 11k Western Thames Basin National Character Area Profile #
- New 11k Thames Valley National Character Area Profile #
- London Borough of Richmond upon Thames Landscape Character Areas
- Twickenham & St Margarets
- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8

FIGURE 1
 Proposed Teddington Athletic Ground
 Location of Photographic Viewpoints
 (Site Context Photographs 1-7)

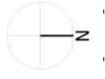
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 Development Ltd






Project No: 25615
 Drawing No: 11
 Date: 08.02.2017
 Scale: 1:1000 (A3)
 Project No: 25615

Drawn by: [Name]
 Checked by: [Name]
 Date: 08.02.2017
 Scale: 1:1000 (A3)
 Project No: 25615



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 Date Dm Cld
 Revision



- LEGEND**
-  Site Boundary
 -  Contours/Spot Heights (Metres AOD) ~
 -  Listed Buildings ~
 -  Other Open Land of Townscape Importance *
 -  Location of Photographic Viewpoints (Site Context Photographs A-D)

Data collected for contained and analysis purposes is based on publicly available sources at the time of preparation prepared using the British National Grid and may differ and be inaccurate. Barton Willmore shall not be liable for the accuracy of data derived from external sources.

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FIGURE 2
 Project:
 Teddington Athletic Ground

Drawing Title
 Site Appraisal Plan

Date 08.02.2017
 Project No NTS @A3
 Drawing No 25615

Scale 1:2,000 @A2
 NTS @A3
 L2

Drawn by MK
 Check by

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Site plan showing ownership boundary and indicative use zones to accompany Quantum Group's Publication Consultation representation form

15th February 2017

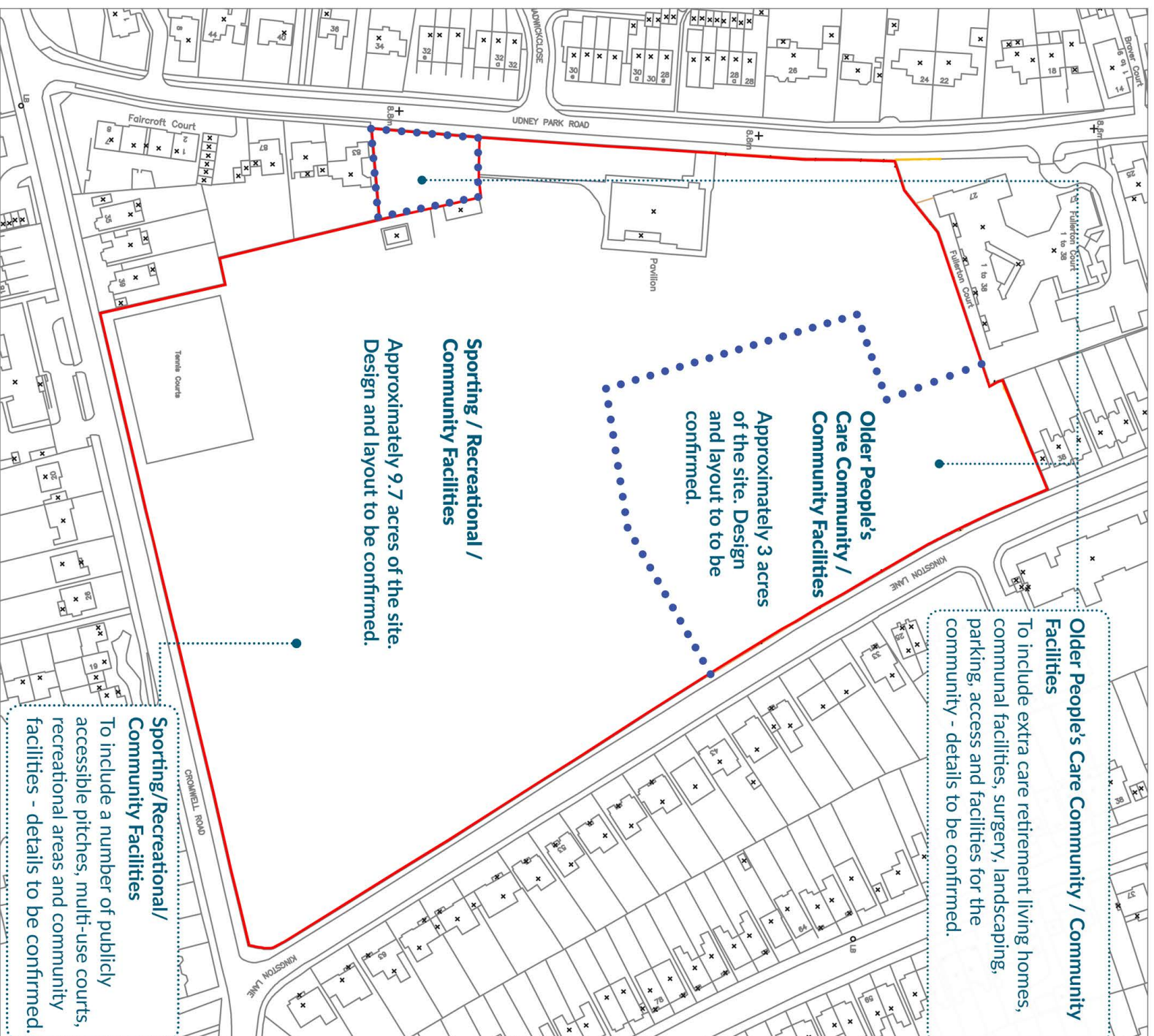


FIGURE 3



FIGURE 4 : Illustrative Proposals

Former Imperial College Private Ground, Teddington.

Illustrative masterplan layout.

(One but not the only way development may be proposed - illustrative purposes only)



SITE APPRAISAL PHOTOGRAPH A:



SITE APPRAISAL PHOTOGRAPH B:



SITE APPRAISAL PHOTOGRAPH C:



SITE APPRAISAL PHOTOGRAPH D:

TEDDINGTON
ATHLETIC GROUND

SITE APPRAISAL
PHOTOGRAPHS: A - D
RECOMMENDED VIEWING
DISTANCE: 20CM @A1
DATE TAKEN: FEB 2017
PROJECT NUMBER: 25615

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SITE CONTEXT PHOTOGRAPH 1:



SITE CONTEXT PHOTOGRAPH 2:



SITE CONTEXT PHOTOGRAPH 3:



SITE CONTEXT PHOTOGRAPH 4:

TEDDINGTON
ATHLETIC GROUND

SITE CONTEXT
PHOTOGRAPHS: 1 - 4
RECOMMENDED VIEWING
DISTANCE: 20CM @A1
DATE TAKEN: FEB 2017
PROJECT NUMBER: 25615

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