

London Borough of Richmond upon Thames – Local Plan Examination 2017

Statement of Common Ground – London Borough of Richmond upon Thames and Defence Infrastructure Organisation

The Defence Infrastructure Organisation (DIO), in their Further Statement dated September 2017, made a number of comments and suggested modifications in relation to Kneller Hall (Site Allocation SA 14).

This Statement of Common Ground sets out the areas of agreement between the London Borough of Richmond upon Thames and the Defence Infrastructure Organisation, and proposes resulting minor changes and modifications to the Publication Local Plan as submitted for independent examination in public. The Inspector is asked to consider these minor changes / modifications, which are acceptable to and have been agreed by both parties. The Statement also identifies areas where agreement has not been reached and which may require further discussion during the examination / hearing sessions.

Text proposed to be inserted in **bold underlined**


Text proposed to be removed in ~~red strikethrough~~

Policy / Section / paragraph	DIO Representation	LBRuT Response	Reason for Change	Common Ground Agreed?
SA 14 – first bullet point of supporting text	The supporting text is misleading regarding the site’s current use (it is military barracks – not a school), which creates uncertainty regarding the application of any other land use related policies. This is not effective. The DIO would like the supporting text to be clear in stating that the site is a military barracks rather than a school.	The Council considers the first bullet point of the supporting text to be clear and effective. It states that the site is currently occupied by the Royal Military School of Music. Neither the policy nor its supporting text state that the site as a ‘school’ in terms of an educational establishment. Kneller Hall has been the home of the Royal Military School of Music since 1857, and the Council and its local community are proud of the cultural and historic legacy that comes with this site. It should be noted that in line with the Land Use Gazateer, a ‘ <i>Military school of music</i> ’ is defined as ‘D1’ use class, and ‘ <i>Barracks (Army Navy police or RAF)</i> ’ are defined as ‘ <i>sui generis</i> ’.	N/A	Agreed that no change is required for bullet point 1

Policy / Section / paragraph	DIO Representation	LBRuT Response	Reason for Change	Common Ground Agreed?
SA 14 – second bullet point of supporting text	SA 14 suggests uncertainty regarding the availability of the site. The Government has announced that the site is to become available for development by 2020. This uncertainty is not justified. The following amendment of bullet point 2 is suggested: <u>"Defence Minister Mark Lancaster announced the release of Kneller Hall on 18 January 2016. This was confirmed in the document 'A Better Defence Estate', Nov 2016, where it was stated that there was an intention to release Kneller Hall for disposal in 2020."</u>	The Council is amenable to the DIO's proposed amendment, and the following change is proposed: Delete the existing bullet point 2: "The site is subject to being declared surplus to requirements by the Defence Infrastructure Organisation." And replace with the following wording: <u>"Defence Minister Mark Lancaster announced the release of Kneller Hall on 18 January 2016. This was confirmed in the document 'A Better Defence Estate', Nov 2016, where it was stated that there was an intention to release Kneller Hall for disposal in 2020."</u>	To recognise that the updated position with regard to the availability of the site.	Agreed
SA 14	SA 14 does not make clear that residential should be the principal future use, and therefore is not clearly justified/effective. DIO requests that the supporting text to SA14 states that in the list of acceptable uses, the first is residential led. It is important that the redeveloped site is primarily residential because the Ministry of Defence has an obligation to government to rationalise its estate and in doing so deliver land for housing units. It is also important that the site allocation SA14 gives an idea	The Council is committed to working with the DIO and MoD in partnership to develop a Masterplan / site development brief SPD. The Local Government Association has just announced (on 20 September 2017) that Richmond Council has been successful in securing One Public Estate (OPE) funding for £20,000 for progressing a full application for a final Services and Assets Delivery Plan and for further OPE funding. This bid has been prepared jointly with the MoD. The Council considers that SA 14 is sufficiently flexibility to allow a range of uses that may be appropriate for this site to be fully considered and explored as part of the development of the SPD, in consultation with the local community. SA 14 (within the main policy text) clearly	N/A	<ul style="list-style-type: none"> • DIO agrees with the Council's first paragraph regarding working together and OPE. • DIO does not agree with the second paragraph and argues that the list should state "residential led"

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	<p>of the number of units that will be in the development. This is in accordance with National Planning Practice Guidance (PPG) which advises that where sites are proposed for allocation, sufficient details should be provided about the nature and scale of the development. In this context DIO have provided an idea of the numbers from our recent preliminary work on site capacity. It is indicative at this stage but DIO thinks that some indication of numbers should be given, such as a target of 150 units or a range between 100 and 150 units.</p>	<p>mentions residential use as the first appropriate land use. Overall, the policy provides flexibility regarding a mix of uses that can be further identified and refined as part of the SPD work.</p> <p>The Council considers that it is too premature to estimate the potential capacity for housing units without having undertaken co-operatively the further work required to progress further the OPE funding application and SPD. At this stage, the Council has only identified an indicative range of residential units for 20-30 within the Council's Housing AMR for 2016/17.</p> <p>The Council also notes that the Further Statement by the DIO and their appendices only show the provision of residential units without any other land uses; the detailed plans have not been submitted to the Council before and would require further assessment, which the Council expects to be undertaken jointly as part of the SPD work .</p>		<ul style="list-style-type: none"> • DIO does not agree with the third paragraph as DIO has done some early work on capacity and the indicative plan submitted shows this. • DIO agrees with the fourth/final paragraph.

Both parties consider that these amendments address some of the concerns raised by the Defence Infrastructure Organisation in their representations and their Further Statement on the **London Borough of Richmond upon Thames – Local Plan Examination 2017**

Signed on Behalf of the London Borough of Richmond upon Thames		
Name and Position	Signature	Date
Andrea Kitzberger-Smith Policy and Design Team Manager London Borough of Richmond upon Thames		22 September 2017

Signed on Behalf of the Defence Infrastructure Organisation		
Name and Position	Signature	Date
Louise Spalding Senior Town Planner Estates, Disposals and Acquisitions	<i>Louise Spalding</i> <i>(Signature to follow on Monday 25 September)</i>	22 September 2017