



## **LB Richmond upon Thames Local Plan**

### **Sustainability Appraisal Addendum**

**accompanying**

***Consultation on Proposed Main Modification in  
respect of Local Green Space at Udney Park Playing  
Fields, Teddington***

***22 February to 5 April 2019***

**February 2019**

## 1. Introduction and how to comment

1.1 Following an application to the High Court for a statutory review (under s.113 of the Planning and Compulsory Purchase Act 2004) in respect of the adoption of the Richmond Local Plan (on 3 July 2018), a Court Order has quashed paragraph 5.2.8 in the Local Plan, which relates to the designation of land as Local Green Space LGS).

1.2 The Court Order requires the Council to publish the Inspector's proposed change to paragraph 5.2.8 in the [Publication Local Plan](#), together with an explanation of its effect in terms of it representing the proposed removal of the Local Green Space designation from Udney Park Playing Fields, as a proposed Main Modification to the submitted version of the Local Plan for public consultation, for a period of six weeks. This is set out in the following schedule.

1.3 This Addendum to the [Sustainability Appraisal of the Publication Local Plan](#) in respect of the proposed Main Modification has been published.

1.4 This consultation is only on this proposed Main Modification in respect of the Udney Park Playing Fields and not on other aspects of the Plan. It does not provide the opportunity to raise any other potential sites in the borough for designation as Local Green Space or any other matters. Main Modifications are those which the Inspector considers are necessary to make the plan sound and/or legally compliant. Main Modifications are proposed without prejudice to an Inspector's final conclusion on this issue, which will take account of all representations submitted in response to this consultation.

1.5 Copies of the proposed Main Modification, and this accompanying Sustainability Appraisal Addendum, are available as follows:

- On the Council's website at [www.richmond.gov.uk/local\\_plan\\_examination](http://www.richmond.gov.uk/local_plan_examination)
- In the Borough's main libraries
- At the Civic Centre reception, 44 York Street, Twickenham, TW1 3BZ

1.6 If you wish to make representations on the above Main Modification only, please send us your response by 5pm on 5 April 2019.

1.7 You can respond either:

- by email to **LocalPlan@richmond.gov.uk** or
- by post to Policy and Design, LB Richmond upon Thames, Civic Centre, 44 York Street, Twickenham, Middlesex TW1 3BZ.

Please note that your response will not be treated as confidential. If you have any queries, please email [LocalPlan@richmond.gov.uk](mailto:LocalPlan@richmond.gov.uk) or phone 020 8891 1411.

## 2. Methodology

2.1 The Council is legally required under both European and UK law to prepare a Sustainability Appraisal (SA) of the Local Plan in order to help ensure that sustainability objectives including social, environmental and economic considerations are taken into account during all stages of the Plan preparation. Note that the SA process incorporates the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 (commonly referred to as the 'Strategic Environmental Assessment Regulations'), which implement the requirements of the European Directive 2001/42/EC (the 'Strategic Environmental Assessment Directive') on the assessment of the effects of certain plans and programmes on the environment.

2.2 The process of the SA has been integral to the development of the LB of Richmond upon Thames (LBRuT) Local Plan adopted in July 2018, with findings published and consulted upon alongside the Local Plan at each stage of its preparation. This has included the preparation of a series of SA documents including the Revised SA Scoping Report (PS-007)<sup>1</sup>, the Pre-publication Local Plan Sustainability Appraisal (PS-008)<sup>2</sup>, the Publication Local Plan SA (SD-003)<sup>3</sup> and the Council's response to the Inspector's Procedural Letter (LBR-LP-005)<sup>4</sup>, which summarises the SA stages and iterations that informed the Local Plan. All of the above referred documents can be found in the [examination documents list](#).

2.3 The SA is an iterative process and has been used to assess policy options and site selection to ensure that the plan contributes to the achievement of sustainable development, and any potential negative impacts on sustainability are minimised or effectively mitigated. Since the last SA was undertaken a number of facts have come to light that have assisted and informed this appraisal, such as ecology reports as presented as part of the legal challenge.

### **3. Purpose of the Addendum Report to the Sustainability Appraisal**

3.1 This note is an Addendum to the Sustainability Appraisal / Strategic Environmental Assessment Report<sup>5</sup> submitted as part of the Local Plan examination.

3.2 The Court Judgement<sup>6</sup>, as referred to in section 1, found a procedural defect in the sustainability consultation accompanying the Council's proposed Main Modifications consultation (and accompanying Sustainability Appraisal), which took place in 2018 after the examination hearing sessions.

3.3 This addendum to the SA provides an objective assessment as to whether the proposed Main Modification that is subject to consultation as referred to in the judgement is likely to have any significant effects on the sustainability objectives. Government guidance on carrying out SA states that it "*should only focus on what is needed to assess the likely significant effects of the Local Plan. [...] It does not need to be done in any more detail, or using more resources, than is considered to be appropriate for the content and level of detail in the Local Plan*".<sup>7</sup>

3.4 The proposed Main Modification and this Addendum are subject to public consultation from 22 February to 5 April 2019. This Addendum considers the potential sustainability implications of the proposed Main Modification and presents an objective assessment of any potential sustainability implications which might arise. For transparency, four options have been assessed for their likely effects on the sustainability objectives, to both assess the policy as a whole along with all other designated sites (i.e. Green Belt and Metropolitan Open Land), and the LGS site designation individually. Whilst Government guidance makes it clear that this level of detail is not usually considered necessary (see above), the Council has decided to provide this level of detail to fully inform the public consultation and the subsequent examination in public. It may also aid an independent examiner/inspector who will consider whether or not to recommend a Main Modification to the LGS designation of Udney Park Playing Fields in the final version of the Local Plan, having regard to the representations made.

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<sup>1</sup> PS-007 Local Plan REVISED Sustainability Appraisal Scoping Report (May 2016)

<sup>2</sup> PS-008 Sustainability Appraisal – Pre-publication Local Plan Public Consultation: 8 July – 19 August 2016

<sup>3</sup> SD-003 Sustainability Appraisal – Local Plan Publication version for consultation 4 January - 15 February 2017

<sup>4</sup> LBR-LP-005 Appendix A – Summary of SA stages and iterations that have informed the Local Plan

<sup>5</sup> SD-003 Sustainability Appraisal – Local Plan Publication version for consultation 4 January - 15 February 2017

<sup>6</sup> Available for download on the Council's website: [https://www.richmond.gov.uk/local\\_plan\\_examination](https://www.richmond.gov.uk/local_plan_examination)

<sup>7</sup> Government guidance: <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal>

## Results of Main Modification

The Main Modification below is expressed by specifying the modification whereby additions are underlined and removals are ~~struck through~~. The page numbers and paragraph numbering below refer to the publication local plan (as [submitted](#)), and do not take account of the deletion or addition of text.

Change Ref. (Where given)	Policy Section or heading	Page/Para- graph	Proposed change	Sustainability Appraisal
	LP13 (in respect of Udney Park Playing Fields)	Para 5.2.8	<p>Amend para to read:</p> <p>5.2.8 Local Green Space, <del>as</del> <u>to be</u> identified on the Policies 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. <u>New areas of Local Green Space designation can only be identified when a plan is being prepared or reviewed.</u></p>	<p>To ensure clarity and effectiveness consistent with national policy.</p> <p><i>The effect of this change represents the proposed removal of the Local Green Space (LGS) designation from Udney Park Playing Fields (UPPF) (based on paragraphs 68 and 69 of the <a href="#">Inspector's Report</a> April 2018).</i></p> <p>A further SA has been undertaken as set out in Appendix 2 of this document.</p>

## **4. Conclusion**

4.1 Overall, the assessment of the proposed Main Modification found that there would be no likely significant negative effects when assessed against the sustainability objectives in the SA, with many neutral or positive effects being identified. The modification therefore does not significantly alter the overall findings of the Publication Local Plan SA (SD-003)<sup>8</sup> in terms of delivering positive sustainability outcomes.

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<sup>8</sup> SD-003 Sustainability Appraisal – Local Plan Publication version for consultation 4 January - 15 February 2017

## Appendix 1: Sustainability Appraisal Framework for the Local Plan

SA objectives for the London Borough of Richmond upon Thames Local Plan			
	Env	Econ	Soc
1) To prevent and reduce the amount of waste that is produced and increase the proportion that is reused, recycled and composted, recovered (including energy recovery) before lastly disposal.	✓		
2) To reduce pollution (such as air, noise, light, water and soil) from any source and ensure air and water quality improves and safeguard soil quality and quantity.	✓		
3) To reduce the need for travel, encourage alternatives to the car, make best use of existing transport infrastructure and improve public transport integration.	✓		✓
4) To mitigate climate change by reducing greenhouse gas emissions and promoting sustainable energy use through maximising energy efficiency, use of zero- and low carbon technologies and renewable energy, and provide satisfactory water and sewerage infrastructure.	✓		✓
5) To ensure resilience to the effects of climate change through effective adaptation, in particular avoiding or reducing flood risk from all sources and conserving water.	✓	✓	✓
6) To conserve and enhance biodiversity, avoid damage and irreversible losses to designated sites and protected species, adding to the abundance of non-designated biodiversity features and habitats (such as trees, gardens, green roofs and other features).	✓		
7) To promote high quality places, spaces and buildings and conserve and enhance the borough's landscape and townscape character and its heritage assets and their settings..	✓	✓	✓
8) To protect and enhance the quality and range of parks and open spaces and plan positively for the creation, protection and enhancement of the green infrastructure network.	✓		✓
9) To make best and efficient use of previously developed land and existing buildings, implement sustainable design and construction practices and remediate and reuse contaminated land.	✓	✓	✓
10) To provide new housing opportunities and sufficient affordable housing that meets local needs.		✓	✓
11) To facilitate and improve the health and well-being of the population, reduce health inequalities and deliver safer and more secure communities.			✓
12) To promote the independence of people and communities by improving the quality, range and accessibility of services and facilities, such as health, transport, education, training, employment, environment, leisure, sport and recreation opportunities.		✓	✓
13) To increase the vitality and viability of existing town centres, local centres and parades.		✓	✓
14) To promote and strengthen a buoyant, diverse and resilient local economy and facilitate inward investment that will secure sustainable economic growth.		✓	✓
15) To increase the amount and quality of commercial development opportunities to meet the needs of the local and sub-regional economy.		✓	✓

## Appendix 2: Sustainability Appraisal of Policy LP 13 (Option A and Option B) and of Udney Park Playing Fields (Option A and Option B)

### 1. Sustainability Appraisal of Policy LP 13

Option A: LP 13 Green Belt, Metropolitan Open Land and Local Green Space (considering policy as a whole, with other designated Green Belt and Metropolitan Open Land) including UPPF as LGS							
SA Objectives	Geographic Scale		Assessment/length of effect			cumulative	Commentary/explanation uncertainties, & proposed mitigation
	Local	Trans boundary	Short term	Medium term	Long term		
1. waste							Neutral
2. pollution: air, noise, light, water and soil			+	+	+	+	Only minor development is allowed so soil quality and quantity will be protected
3. travel							Neutral
4. energy							Neutral
5. water			+	+	+	+	Rivers and bodies of water are included in MOL
6. biodiversity			+	+	++	++	Policy protects open land and its inherent biodiversity. The Udney Park Playing Fields provide a habitat for bats (a protected species), which is of significant value to the borough's ecology
7. landscape & townscape			+	+	+	+	Policy protects the landscape, including the Udney Park Playing Fields
8. green spaces				+	+	+	Policy protects the landscape some of which will be part of the green infrastructure network, including the Udney Park

							Playing Fields
9. best use of land & sustainable construction							neutral
10. housing				-	-	-	Negative effects for housing as it restricts housing opportunities, including at the Udney Park Playing Fields site
11. safer & cohesive communities							neutral
12. health & well being			++	++	++	++	A strongly positive effect for health and well-being, as it allows sports, leisure and recreation. The Udney Park Playing Fields are currently able to accommodate 2 x cricket pitches and has been valued for its use for sports and recreation since 1919
13. town centres							Neutral
14. economy							Neutral
15. commercial development opportunities				-	-	-	A negative effect for commercial development as it restricts opportunities
<p><i>Summary: (likely sustainability impact of the option)</i></p> <p>This policy has overall a positive impact, in particular in terms of environmental and social perspectives. The Udney Park Playing Fields supports a habitat for a protected species (i.e. bats), which is considered to be of significant value to the borough's overall ecology. The Playing Fields' historic recreational value for many sports including cricket and football, which is likely to be maintained for the future.</p>							
<p><i>Possible mitigation: (measures to mitigate likely negative effects and enhance positive effects )</i></p> <p>The likely negative effects of the policy are that it restricts opportunities for housing and commercial development. The policy recognises that there may be exceptional cases where inappropriate</p>							



development, such as small scale structures for essential utility infrastructure, may be acceptable.

In relation to Udney Park Playing Fields, if there were sports related development including intensification of sports use, any floodlighting would have to be limited to prevent disturbance to bats and wildlife. Boundary trees and hedgerows are important for foraging and commuting bats providing key, linear features for flight routes and wildlife corridors should continue to be protected. Any landscaping proposals must be designed to add value to the open space where possible by providing new diverse areas of planting and vegetation where possible. Bat boxes must be erected and ponds would be an enhancement for reptiles and other wildlife.

**Option B: LP 13 Green Belt, Metropolitan Open Land and Local Green Space (considering policy as a whole, with other designated Green Belt and Metropolitan Open Land) excluding UPPF as LGS**

SA Objectives	Geographic Scale		Assessment/length of effect			cumulative	Commentary/explanation uncertainties, & proposed mitigation
	Local	Trans boundary	Short term	Medium term	Long term		
1. waste							Neutral
2. pollution: air, noise, light, water and soil			+	+	+	+	Only minor development is allowed so soil quality and quantity will be protected.
3. travel							Neutral
4. energy							Neutral
5. water			+	+	+	+	Rivers and bodies of water are included in MOL
6. biodiversity			+	+	+	+	Policy protects open land and its inherent biodiversity
7. landscape & townscape			+	+	+	+	Policy protects the landscape
8. green spaces				+	+	+	Policy protects the landscape some of which will be part of the green infrastructure network

9. best use of land & sustainable construction							neutral
10. housing				-	-	-	Negative effects for housing as it restricts housing opportunities
11. safer & cohesive communities							neutral
12. health & well being			+	+	++	++	A positive effect for health and well-being, as it allows sports, leisure and recreation.
13. town centres							Neutral
14. economy							Neutral
15. commercial development opportunities				-	-	-	A negative effect for commercial development as it restricts opportunities
<p><b>Summary: (likely sustainability impact of the option)</b></p> <p>This policy has overall a positive impact, in particular in terms of environmental and social perspectives.</p>							
<p><b>Possible mitigation: (measures to mitigate likely negative effects and enhance positive effects )</b></p> <p>The likely negative effects of the policy are that it restricts opportunities for housing and commercial development. The policy recognises that there may be exceptional cases where inappropriate development, such as small scale structures for essential utility infrastructure, may be acceptable.</p>							
<p><b>Conclusions: (compare the different options)</b></p> <p>Both Option A and Option B protect Green Belt and MOL. The LGS identified at Udney Park Playing Fields offers additional protection over its current status as Other Open Land of Townscape Importance; the LGS designation would support the protection of bats and would help to preserve the sporting use for the local community. Option A is considered to be potentially slightly more sustainable due to the likely significant biodiversity benefits.</p>							

## 2. Sustainability Appraisal of UPPF as a single site

Option A: UPPF as a single site, with its designation as LGS							
SA Objectives	Geographic Scale		Assessment/length of effect			cumulative	Commentary/explanation uncertainties, & proposed mitigation
	Local	Trans boundary	Short term	Medium term	Long term		
1. waste							Neutral
2. pollution: air, noise, light, water and soil							Neutral
3. travel							Neutral
4. energy							Neutral
5. water							Neutral
6. biodiversity			+	+	++	++	Local Plan policy LP 14 protects designated open land; however, it is not specifically aimed at protecting biodiversity. The Udney Park Playing Fields provide a habitat for bats (a protected species), which is of significant value to the borough's ecology. The LGS designation (for which a criterion for designation could be the value to wildlife in line with the NPPF) would add an additional layer of protection.
7. landscape & townscape			+	+	+	+	Whilst the OOLTI policy provides a local protection, the LGS designation would provide an additional layer of protection, supported by national policy guidance, to ensure the landscape and townscape of this

							site is conserved and enhanced.
8. green spaces				+	+	+	The designation of this site as LGS would add an additional layer of protection to this site's contribution to the borough's overall green infrastructure network.
9. best use of land & sustainable construction							neutral
10. housing				-	-		As the LGS designation would provide an additional layer of protection, supported by national policy guidance, and OOLTI policy in itself allows for a comprehensive approach to redevelopment provided certain criteria are met, it is likely that commercial development opportunities would be more limited.
11. safer & cohesive communities							neutral
12. health & well being			+	+	+	+	The LGS designation is partly in response to the value of the site to the local community as they have been in use for sports and recreation since 1919, and the designation could promote health and well-being by virtue of providing leisure, sport and recreation opportunities.
13. town centres							Neutral
14. economy							Neutral

15. commercial development opportunities				-	-		As the LGS designation would provide an additional protection, supported by national policy guidance, and OOLTI policy in itself allows for a comprehensive approach to redevelopment provided certain criteria are met, it is likely that commercial development opportunities would be more limited.
<p>Summary: <i>(likely sustainability impact of the option)</i></p> <p>The LGS designation has overall positive impacts, in particular in terms of environmental perspectives. An ecological appraisal of the site found though it is situated in an urban area the sports fields and hedgerows on the site may provide important foraging habitat for bats in the local area. The individual appraisal against some of the objectives demonstrates the additional layer of protection that the site would benefit from if it is designated as LGS in comparison to the status quo as OOLTI. The SA has also identified likely negative effects in terms of opportunities for housing and commercial development.</p>							
<p>Possible mitigation: <i>(measures to mitigate likely negative effects and enhance positive effects )</i></p> <p>The likely negative effects of the LGS designation are that it restricts opportunities for housing and commercial development. The site is however already protected as OOLTI and therefore development restrictions already apply.</p>							

**Option B: UPPF as a single site, without designation as LGS**

Option B can be considered as retaining the baseline and the status quo. The playing fields are designated Other Open Land of Townscape Importance (OOLTI), and the associated OOLTI policy (LP 14) states that these areas will be protected in open use, and enhanced where possible.

As this option provides the default position, it is considered to be 'Neutral' with respect to all identified SA objectives as the OOLTI designation is not subject to change as part of the proposed Main Modification consultation.

Summary: *(likely sustainability impact of the option)*  
N/A

Possible mitigation: *(measures to mitigate likely negative effects and enhance positive effects )*  
N/A

Conclusions: *(compare the different options)*

Designating the site as LGS is likely to have some positive environmental effects, especially in relation to biodiversity but also in relation to its contribution to the sporting use and value to the local community. The existing OOLTI designation is a local policy concerned with the protection of open spaces that contribute to the importance of townscape and local character. The associated OOLTI policy LP 14 requires the protection of land designated as OOLTI in open use, and the policy only

allows for minor extensions or replacement facilities provided that it would not harm the character or openness of the open land. Option A, i.e. the LGS designation for this site, would therefore provide some additional protection at a level that is similar to Green Belt and/or Metropolitan Open Land, for which there is both national and regional policy and guidance.