

Appendices to all responses received to the New Local Plan Direction of Travel consultation
https://www.richmond.gov.uk/new_local_plan_direction_of_travel_engagement

Consultation from Monday 24 February to Sunday 5 April 2020
Published by LBRuT on 30 November 2020

Respondent reference no.	Name / Organisation
15	Transport for London (TfL)
16	Avison Young on behalf of National Grid
23	Peter Willan & Paul Velluet on behalf of Old Deer Park Working Group
24	Paul Velluet
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs



Appendix A: Specific suggested edits and comments from TfL on Richmond’s draft Transport Supplementary Planning document

Section	Page	Track change/comment
Introduction	4	<p>We greatly support Richmond’s recognition of the climate emergency and the importance of transport infrastructure and active travel facilities/networks to support travel around existing and new communities.</p> <p>We therefore request that the anticipated date for the publication of the draft London Plan in March 2020 is removed/updated as appropriate, as this is unlikely to be met.</p>
Introduction - Our Place in London –	6	<p>We believe that the borough’s main challenges include high levels of car ownership, congestion and the promotion of sustainable travel in less accessible parts of the borough. We also appreciate that the Council recognises that cross borough boundary issues, such as congestion and improving sustainable travel networks will need to be addressed by working with neighbouring boroughs and TfL.</p> <p>Richmond’s new draft Local Plan should focus on how sustainable travel can be prioritised above private car travel, especially in areas where new developments are planned. Focusing car-free and car-lite development in well-connected parts of the borough supported by existing/planned sustainable transport infrastructure will ensure the best use of land within the borough and help reduce reliance on private vehicles. Policies that support the delivery of sufficient levels of high quality cycle parking should also be adopted in order to enable more people to cycle.</p> <p>We also believe that it is vital that Richmond continue to protect Green Belt and MOL from development. These areas also will not have the appropriate services and transport infrastructure to support new developments in line with Good Growth.</p>
Responding to the climate emergency	14	<p>We strongly support Richmond’s declaration of a climate emergency in July 2019 and adoption of their Climate Emergency Strategy in 2020, which will help the Council overcome environmental challenges faced by the borough. We also welcome the Council’s commitment to become carbon neutral by 2030, which will help minimise the borough’s contribution to climate change. Influencing</p>

Section	Page	Track change/comment
		transport behaviour will be key to achieving this and the Council should develop strategies to enable residents to be less car dependent and travel more on foot, cycle and public transport.
Shaping and supporting our town centre and local centres	26	<p>We strongly support Richmond’s policy to focus development in line with the town centre first principle, which is in line with the policies set out in the Intend to Publish version of the London Plan. We also would encourage the Council to build residential and mixed use developments in well-connected town, local and community centres. The Council should ensure that travel to/from and within their town centres by foot, cycle and public transport is as safe, convenient and attractive as possible. We would also encourage reducing the provision of car parking in town centres and would recommend that the Council look at opportunities to convert on-street parking bays to provide additional cycle parking.</p> <p>The approach to redevelop existing out-of-centre developments/retail parks should make sure that these are accessible by sustainable modes of transport so that they are not car dependent. Car and cycle parking provision should also be in line with the policy standards in the Intend to Publish London Plan and make sure that they are designed and located in a way which prioritises active travel choices.</p> <p>The borough has been identified in the draft London Plan as an area where higher cycle provision is required, both to cater for future growth and to reflect that around 7.5 per cent of trips arriving at workplace, leisure and shopping destinations are made by cycle, more than twice the average for inner London (see Appendix B). To support town centre and out of centre retail developments we would welcome clearer support for ensuring cycle parking quality, such as in relation to location, spacing and access.</p>
Green Infrastructure and protecting open land	40	We would urge the Council to resist developing areas of the Green Belt and Metropolitan Open Land (MOL). In transport terms, these areas are generally more likely to have lower levels of connectivity by public transport i.e. PTAL 0-1 and lower levels of local amenities compared to developed areas that could potentially be intensified.
Improving design	45	We welcome the design-led approach to help provide high quality places and improved design and

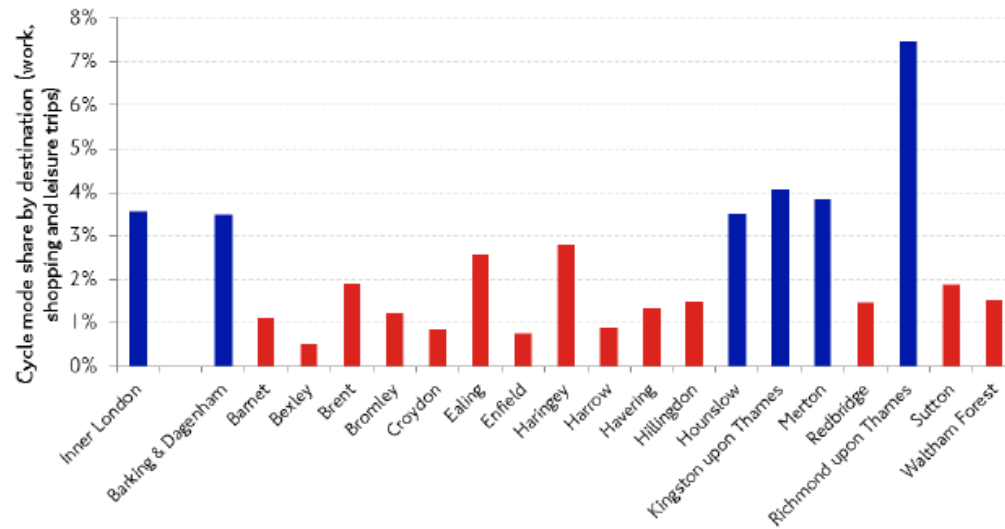
Section	Page	Track change/comment
		support the reference made to the ten characteristics of well-designed places as set out in National Design Guidance. We would welcome a public realm policy in the Richmond's local plan that supports the Healthy Streets Approach and the delivery of high quality public realm that enables inclusive active, inclusive travel.
Promoting sustainable transport	48	<p>We welcome the Council's commitment to addressing the climate emergency and the importance of improving transport and achieving the Mayor's modal shift target in achieving this. We are extremely supportive of the Council prioritising sustainable travel and its recognition of the importance of enhancing the bus, walk and cycling networks in particular as part of this.</p> <p>While we also acknowledge that there will likely be some trips that will continue to be made by car, it is important to view new development as a particular opportunity to embed the best possible approach to maximising sustainable travel. This in turn reduces the extent to which mode shift among residents/users of existing development is needed to meet Richmond's target, which could involve fewer opportunities than having ambitious planning policies in place. Embedding car-free and car-lite lifestyles in development schemes from the outset, as the Council suggests, is an excellent way of achieving this.</p> <p>We welcome the reference made to Crossrail 2, given the transformational effect the scheme could have on the borough. We note the Council's concern regarding ensuring connecting journeys to Crossrail 2 stations are made by public transport, walking and cycling. We strongly support this aim and are open to further discussion on the matter to understand and look to address these concerns.</p>
Buses	49	We welcome the recognition of the importance of bus networks within the borough. We will continue to work with the Council to understand how the existing routes, frequencies and access to bus stops/stations can be improved. To support this, we would welcome clear policies for protecting land/space for bus infrastructure, the expansion of bus priority and developer contributions towards enhanced services.
Hierarchy of street users/active	50	We welcome the intention of the hierarchy of street users. However, we would urge the Council to

Section	Page	Track change/comment
travel		<p>consider some additional nuance around the role of cycling and buses. The two modes need to be considered together to maximise sustainable mode share overall and the benefits each mode offers. In some areas buses play a key role in providing transport connectivity and this needs to be considered alongside expanding access to cycling. In particular, buses play a key role in making London accessible, both in terms of cost of travel and for people who are less able to walk long distances or use stairs and/or escalators at stations.</p> <p>We welcome the Council’s recognition of both the current high levels of active travel in the borough and the potential to grow these further.</p>
Car parking, town centre parking provision, cycle parking, cycling infrastructure and	52	<p>We commend the Council for considering how to deliver less car-dependent development including through lower parking standards. We strongly encourage the Council to requiring car-free and car-lite development as far as possible, so as to best support the vision for sustainable transport it has set out. This will also help minimise new development’s contributions to the climate emergency, make it easier to tackle the housing crisis and reduce congestion on the road network and the borough grows. We welcome that the Council are considering adopting the draft London Plan residential standards across the whole borough, and encourage this option to be pursued. We would also welcome discussion on whether we can better support the Council to achieve lower parking provision in new development, including in less well-connected areas.</p> <p>If parking standards above those set out in the draft London Plan are adopted, particularly in well-connected areas and in borough centres, the Council will risk undermining their ambitions for ensuring ‘walking, cycling and public transport are the natural choice for trips to and from new developments’ and becoming carbon neutral by 2030. In light of the borough’s emphasis on the climate emergency, there is a considerable benefit to reducing emissions more quickly, such as through ambitious parking and mode shift policies, than relying on longer term emission reductions alone (e.g. full electrification of the vehicle fleet). It is therefore essential that car parking in new developments is kept to a minimum and is at least in line with the standards set out the draft London Plan.</p>

Section	Page	Track change/comment
		<p>To support this approach, the Council could look into the expansion of Controlled Parking Zones (CPZs) as necessary. CPZ implementation can be funded by developers when secured as mitigation for their development and we would be happy to offer support such as by sharing best practice from other boroughs and elsewhere to help their implementation. While this may bring about change for some existing residents, this is a better solution than accepting lower housing delivery or higher congestion resulting from more off-street parking. The issue of parking permits can be capped or restricted to residents of new development – as practiced by other local authorities – to prevent additional parking stress on surrounding streets.</p> <p>We welcome that the Council is looking at the potential to reduce the number of parking spaces available in the borough’s centres, and encourage it to pursue this option. By doing so, the Council will better discourage car use where there are good alternatives and encourage walking, cycling and bus access to town centres, where there is considerable potential for mode shift.</p> <p>We strongly support Richmond’s adoption of cycle parking standards and welcome the Council’s plans to investigate adopting cycle parking standards higher than those in the London Plan to reflect local circumstances. We would also welcome specific policies in the borough’s new local Plan to provide policies to support the delivery of cycle parking quality, such as location, spacing and access, as detailed in Richmond’s draft Transport SPD.</p> <p>We strongly support the Council’s approach to securing developer contributions to the cycle networks within Richmond as set out in the recent draft Transport SPD. The Council’s Active Travel Strategy highlights areas that are less permeable by cycle, and this is something that developer contributions could also look to improve alongside strategic and local routes.</p>
Securing social and community infrastructure	53	We welcome references made to delivering the Healthy Streets Approach to support community cohesion and a growing population. We, especially welcome these references in the context of improving the public realm.

Appendix B: Destination-based cycle mode shares¹

Figure 4: Cycle mode share by destination for commute, shopping and leisure trips only, outer London boroughs compared to inner London



Source: London Travel Demand Survey, 2012/13 to 2014/15

¹ https://www.london.gov.uk/sites/default/files/london_plan_evidence_base_-_cycle_parking.pdf

Respondent 16. Avison Young on behalf of National Grid

National Grid
24 March 2020
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Guidance on development near National Grid assets

National Grid is able to provide advice and guidance to the Council concerning their networks and encourages high quality and well-planned development in the vicinity of its assets.

Electricity assets

Developers of sites crossed or in close proximity to National Grid assets should be aware that it is National Grid policy to retain existing overhead lines in-situ, though it recognises that there may be exceptional circumstances that would justify the request where, for example, the proposal is of regional or national importance.

National Grid's 'Guidelines for Development near pylons and high voltage overhead power lines' promote the successful development of sites crossed by existing overhead lines and the creation of well-designed places. The guidelines demonstrate that a creative design approach can minimise the impact of overhead lines whilst promoting a quality environment. The guidelines can be downloaded here: <https://www.nationalgridet.com/document/130626/download>

The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site.

National Grid's statutory safety clearances are detailed in their 'Guidelines when working near National Grid Electricity Transmission assets', which can be downloaded here: www.nationalgridet.com/network-and-assets/working-near-our-assets

Gas assets

High-Pressure Gas Pipelines form an essential part of the national gas transmission system and National Grid's approach is always to seek to leave their existing transmission pipelines in situ. Contact should be made with the Health and Safety Executive (HSE) in respect of sites affected by High-Pressure Gas Pipelines.

National Grid have land rights for each asset which prevents the erection of permanent/ temporary buildings, or structures, changes to existing ground levels, storage of materials etc. Additionally, written permission will be required before any works commence within the National Grid's 12.2m building proximity distance, and a deed of consent is required for any crossing of the easement.

National Grid's 'Guidelines when working near National Grid Gas assets' can be downloaded here: www.nationalgridgas.com/land-and-assets/working-near-our-assets

How to contact National Grid

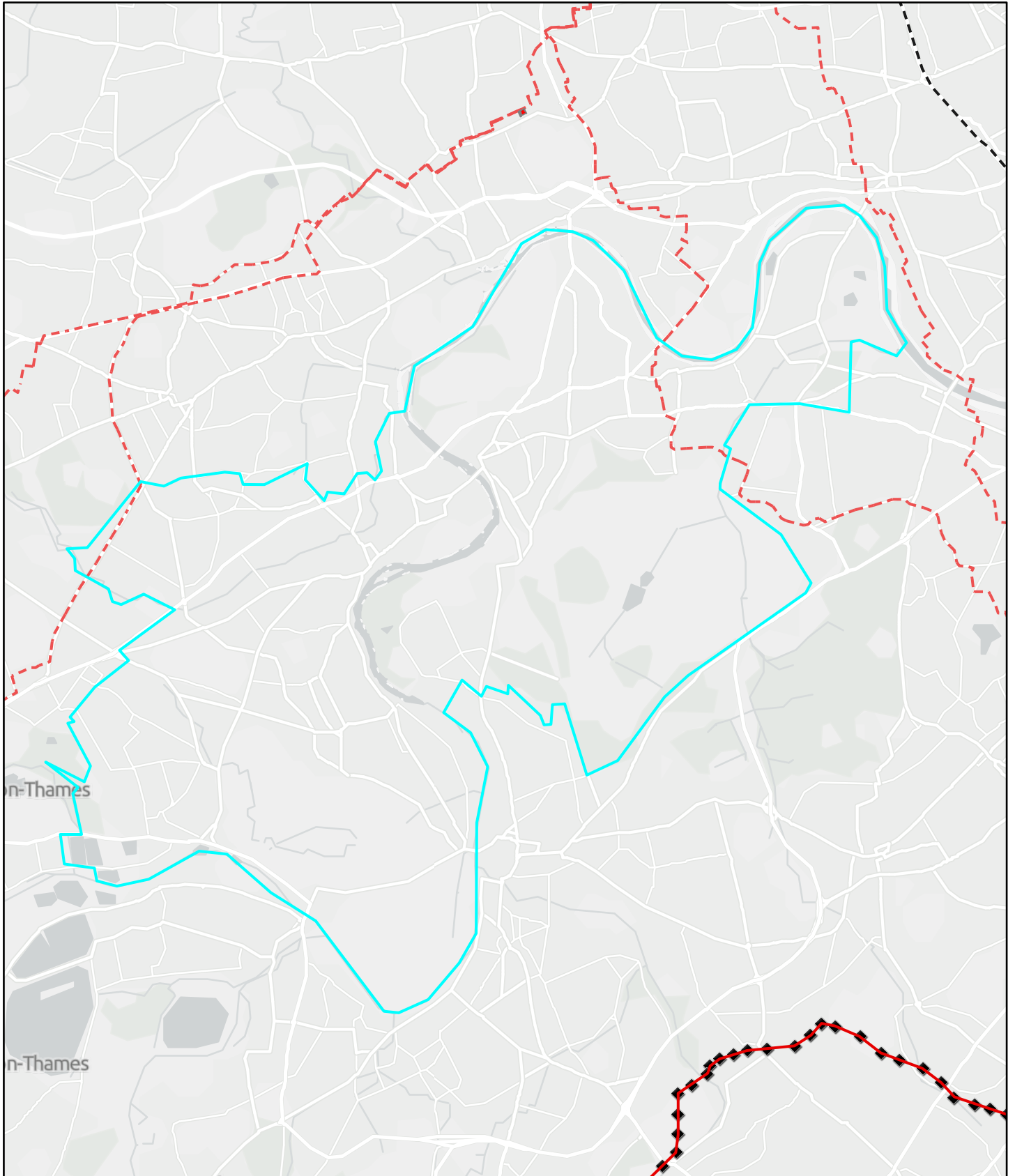
If you require any further information in relation to the above and/or if you would like to check if National Grid's transmission networks may be affected by a proposed development, please contact:

- National Grid's Plant Protection team: plantprotection@nationalgrid.com

Cadent Plant Protection Team
Block 1
Brick Kiln Street
Hinckley
LE10 0NA
0800 688 588

or visit the website: <https://www.beforeyoudig.cadentgas.com/login.aspx>

LBROT - Direction of Travel Consultation - March 2020



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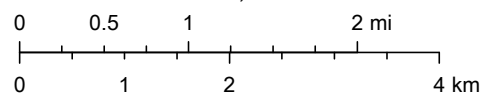
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LONDON BOROUGH OF RICHMOND-UPON-THAMES LOCAL PLAN

A STATEMENT BY THE OLD DEER PARK WORKING GROUP FOR PRESENTATION AT THE RELEVANT HEARING SESSION OF THE INSPECTOR'S EXAMINATION, BASED ON THE GROUP'S EARLIER SUBMISSIONS TO THE COUNCIL, SEPTEMBER, 2017

1. INTRODUCTION

- 1.1 The Old Deer Park Working Group comprises representatives of The Richmond Society, The Kew Society, The Friends of Richmond Green, The Friends of Old Deer Park and The St Margaret's Estate Residents Association. Details of each of the groups are attached in Appendix A.
- 1.2 This statement conveys the concerns of the Working Group regarding the soundness of a number of specific aspects of the Council's final version *Richmond-upon-Thames Local Plan* relating to the Old Deer Park, Richmond. The statement focuses on those aspects of the Council's *Plan* which the Group considers are insufficiently robust in providing the Council, as local planning authority and the local community with effective control over development affecting the particular architectural, historic and landscape significance of the Old Deer Park as a designated heritage asset in the terms commended in the relevant parts of the *National Planning Policy Framework*.
- 1.3 In Section 3 of this Statement, the Working Group has set out its concerns about the soundness of specific aspects of the *Plan* relating to the particular definition of boundaries in the *Proposals Map* insofar as they relate to the Old Deer Park; to the wording of some of the policies of the *Plan* insofar as they relate to the Park; and to the wording of two of the site- specific proposals which relate directly to the Park. In each case, the Group has explained the reasons for its concerns, and put forward its suggestions as to the potential means of addressing the weaknesses of the *Plan* as presently submitted and securing modest amendments which will contribute to providing a sounder statement of Policy insofar as is necessary to ensure that the significance of the Old Deer Park as a designated heritage asset will be assured.

2. THE BACKGROUND TO THE WORKING GROUP'S STATEMENT

- 2.1 In July, 2012, the Group prepared and published a report - *The Old Deer Park, Richmond – Re-connecting the Town to its local park – Realising an under-recognised parkland asset – A framework for future conservation and enhancement*. A copy of the report is attached as Appendix B. The report was intended to provide a positive contribution to discussion and debate in anticipation of the falling-in (in April,

2016) and potential renewal of all but two of the existing leases granted by the Crown Estate for the land comprising the Old Deer Park, Richmond.

- 2.2 Over many years, many living and working in Richmond, Kew and St Margaret's had expressed substantial interest in the effective conservation and enhancement of the Park and have attached considerable value to its amenity, and its particular character and historic, landscape and ecological interest and significance. Accordingly, the Working Group believed that it was timely to set out the corporate views of its constituent bodies on the opportunities that would arise and its keen hope that the Crown Estate would progress the future management of its Old Deer Park estate with a view to assuring its effective conservation and enhancement in addition to its continued use for outdoor sports and recreational activity by the local community.
- 2.3 Importantly, the Working Group was concerned that any development that might be advanced within the area should not only be sustainable in the fullest sense but also consistent with the designation of the Park as a conservation area and its inclusion on English Heritage's *Register of Parks and Gardens of Special Historic Interest* and in the buffer-zone of the *Royal Botanic Gardens Kew World Heritage Site*. In addition, the Group believed that high priority should be given to improving and enhancing physical links between the Town and the Park and suggested a number of measures that might be delivered relatively easily and inexpensively.
- 2.4 Importantly, too, the Working Group also raised concerns regarding significant anomalies regarding the definitions of a number of boundaries relating to the Old Deer Park shown in the Council's *Local Development Framework Proposals Map, Adopted November, 2011*.
- 2.5 Such concerns were set out in detail and justified in the Working Group's report *The Old Deer Park, Richmond - Re-connecting the Town to its local park - Realising an under-recognised parkland asset - A framework for future conservation and enhancement – A submission urging review of boundary definitions* in February, 2013.
- 2.6 In November, 2013, the Working Group set out its formal response to consultation by the Council on its pre-publication version of the *Richmond-upon-Thames Local Plan, Site allocations plan*, published in October, 2013. The substantive part of the concerns of the Working Group about each of the three sites related directly but not exclusively to the significant anomalies in the definitions of boundaries relating to the Old Deer Park shown in the Council's *Local Development Framework Proposals Map, Adopted November, 2011*, as had already been highlighted in the Group's submission of February, 2013.
- 2.7 In July, 2014, the Working Group set out its formal response to consultation by the Council on the pre-publication version of *The Richmond-upon-Thames Local Plan, Site Allocations Plan – New Additional Sites, June, 2013*. Once again, the Working Group

stressed its concerns about the significant anomalies in the definitions of boundaries relating to the Old Deer Park shown in the Council's *Local Development Framework Proposals Map, Adopted November, 2011*.

- 2.8 In August, 2016, the Working Group set out its formal response to consultation by the Council on the first draft, pre-publication version of *The Richmond-upon-Thames Local Plan*, published in July, 2016. In this response, the Working Group stressed its continuing concerns about the significant anomalies in the definitions of boundaries relating to the Old Deer Park shown in the Council's *Local Plan Proposals Map – unchanged* from those shown in the *Local Development Framework Proposals Map, Adopted November, 2011*.
- 2.9 Finally, in February, 2017, the Working Group set out its formal response to consultation by the Council on its final, publication version of the *Richmond-upon-Thames Local Plan*, published in January, 2017. Once again, the Working Group stressed its continuing concerns about the significant anomalies in the definitions of boundaries relating to the Old Deer Park shown in the Council's *Local Plan Proposals Map, Adopted July, 2015 – still unchanged* from those shown in the *Local Development Framework Proposals Map, Adopted November, 2011*.
- 2.10 In this submission, the Working Group observed that a note had been added to the present document advising that 'The existing Proposals Map (2015) and its designations will be retained unless indicated otherwise within this document. In addition, the site-specific allocations as set out within this Plan will also be incorporated into the Council's final version of the Proposals Map'. Regrettably no such advice was provided in relation to the earlier *First Draft of the Local Plan – thus the earlier concern expressed by the Group regarding the absence of a draft, amended Proposals Map*.
- 2.11 The Working Group went on to observe that given the fundamental significance of the *Proposals Map* in securing a sound understanding and appreciation of the policies and site-specific proposals set out in the Final Version of the *Local Plan* and their potential application, the Group remained of the view that the draft, amended *Proposals Map* should be subject to the same consultation and scrutiny as the *Local Plan* and that such a process should be carried out as an integral part of the consultation and scrutiny of the *Local Plan*.
- 2.12 Subsequently, the Group has noted with disappointment that the Council's 32-page document - *Proposals map changes, Local Plan, Publication version for consultation, 4th January – 15th February, 2017* – provided for no amendment to any of the boundaries relating to the Old Deer Park, noting that it specifically excluded the site-specific allocations set out in the main publication version Local Plan at Section 12, and stated unequivocally at paragraph 1.4: 'The Proposals map (2015) will be retained unless indicated otherwise. As such all other designations remain unchanged'.

- 2.13 In addition and importantly, over the last two years the Working Group has been actively engaged with Council officers in discussions and written exchanges in connection with the emerging *Supplementary Planning Document* for the Old Deer Park (otherwise referred to at earlier stages by the Council as a 'Village Plan' and as a 'Planning Brief'). Such engagement has included the submission in November, 2016 of a formal response to the Council's consultation on the development of a *Supplementary Planning Document for the Old Deer Park*, published in October, 2016. A copy of the Working Group's submission is attached as Appendix C.
- 2.14 In this submission, the Working Group drew attention to a number of specific errors in the definition of some of the boundaries shown in the draft document and once again expressed concern regarding the significant anomalies in the definitions of the boundaries extrapolated from the Council's *Local Plan Proposals Map, Adopted July, 2015*; stressing that such anomalies in the relevant boundary definitions should not be perpetuated in the *Old Deer Park SPD* before the Council's *Local Plan Proposals Map* had been properly addressed and resolved in the light of the Working Group's consistent representations and formal examination of the overall *Richmond-upon-Thames Local Plan*. In recent months, the Working Group has been reassured by the Council's planning consultants that the specific errors will be corrected and a number of other matters resolved. However, the Group is concerned that one of the two maps proposed for inclusion in the final version of the *SPD* – that showing land-use designations – may perpetuate the anomalies in the boundaries to which the Working Group has repeatedly referred to.

3. THE KEY ISSUES

THE PROPOSALS MAP (Council references 29 and 113)

- 3.1 The Working Group observes that a note was added to the published version of the Local Plan document advising that 'The existing Proposals Map (2015) and its designations will be retained unless indicated otherwise within this document. In addition, the site-specific allocations as set out within this Plan will also be incorporated into the Council's final version of the Proposals Map'. Regrettably no such advice was provided in relation to the earlier *First Draft of the Local Plan* – thus leading to the earlier concern expressed by the Group regarding the absence of a draft, amended *Proposals Map*.
- 3.2 Given the fundamental significance of a *Proposals Map* in securing a sound understanding and appreciation of the policies and site-specific proposals set out in the final version of the *Local Plan* and their potential application, the Group urges the Inspector to address the boundary-related issues affecting the Old Deer Park to which the Working Group has repeatedly referred in its submissions to the Council as an

integral part of his formal examination the Council's *Local Plan* and to recommend the appropriate amendments to the relevant boundaries shown in the *Proposals Map*.

THE BOUNDARIES OF METROPOLITAN OPEN LAND, PUBLIC OPEN SPACE AND THE RICHMOND TOWN CENTRE (Council reference 481)

- 3.3 The Working Group notes with considerable regret the continuing resistance of the Council to address and resolve the significant and longstanding anomalies in the boundaries of Metropolitan Open Land, Public Open Space and the Richmond Town Centre insofar as they relate to the Old Deer Park as shown on the current and earlier *Proposals Maps*. The Group does not accept the reasons stated by the Council for repeatedly rejecting the need to address and resolve these significant anomalies and believes that the present definition of the boundaries remains entirely unsound, as stated and justified consistently by the Working Group since 2012.

METROPOLITAN OPEN LAND

- 3.4 The greater part of the Park, including the Richmond Athletic Association Ground, the Old Deer Park Car-park and the former and now derelict Public Conveniences and British Legion buildings immediately adjacent, has long been rightly designated as Metropolitan Open Land. However, entirely anomalously, the MOL designation excludes the listed, Council-owned *Pools-on-the-Park* complex, its landscaped grounds and the adjacent car-park, together with the carriageway and footways of the Twickenham Road, despite the inclusion of all these areas within the grade I *Royal Botanic Gardens Kew Registered Park* and the buffer-zone of the *Royal Botanic Gardens Kew World Heritage Site*, and despite repeated representations by groups in the local community over the last thirty or more years. Anomalously too, the present *MOL* designation also excludes the land to the immediate south of the Old Deer Park Car-park on which the single-storey, utility buildings occupied by voluntary groups presently stand.
- 3.5 The Working Group urges the Inspector to recommend that the boundaries of the Metropolitan Open Land within the Park should be amended to include these areas given that they are wholly consistent in their function and open character to the adjacent parkland areas which are properly designated as MOL, and that they are consistent with the definitions of Metropolitan Open Land given in the *London Plan, 2016* and in the *Richmond-upon-Thames Local Plan* itself. Importantly, none of the roads in the Borough's other major historic parks – Richmond and Bushy Parks are similarly excluded from designation as MOL.

PUBLIC OPEN SPACE

- 3.6 The greater part of that park leased by the Council from the Crown Estate has long been rightly designated as Public Open Space. However, entirely anomalously, the POS designation excludes the extensive landscaped grounds which form the immediate

setting of listed, Council-owned *Pools-on-the-Park* complex and the adjacent car-park, which enjoys unrestricted public access, despite their inclusion within the grade I *Royal Botanic Gardens Kew Registered Park* and the buffer-zone of the *Royal Botanic Gardens Kew World Heritage Site*, and despite repeated representations by groups in the local community over the last thirty or more years.

- 3.7 The Council-owned Old Deer Car-park is located in that part of the Old Deer Park closest to The Green and at the principal entry-points to the Park for pedestrians from the northern corner of The Green and the western end of Park Lane. It presents an open and partly landscaped character and appearance, enjoys unrestricted public access and is in public ownership (through the Council as a lessee of The Crown Estate). It is located entirely within the formally designated *Old Deer Park Conservation Area* and the grade I *Royal Botanic Gardens Kew Registered Park*. Despite these major factors, wholly anomalously, the entire car-park site is presently excluded from designation as Public Open Space. Importantly, none of the car-parks in the Borough's other major historic parks – Richmond and Bushy Parks are similarly excluded from designation as Public Open Space.
- 3.8 The Working Group urges the Inspector to recommend that the boundary of Public Open Space within the Park should be amended to include the extensive landscaped grounds which form the immediate setting of the listed, Council-owned *Pools-on-the-Park* complex and the adjacent car-park and the Old Deer Park Car-park given their open and landscaped character, their accessibility to the public, and their consistency with the definitions of *Public Open Space* given in the in the *Richmond-upon-Thames Local Plan* itself.

RICHMOND TOWN CENTRE

- 3.9 The Working Group notes that wholly anomalously, the entire area of the Old Deer Park Car-park, the land to the immediate south of the Old Deer Park Car-park extending down towards the railway (on which the single-storey buildings occupied by voluntary groups stand); and the Royal Mail Depot and former TA Centre are identified as forming part of the designated *Richmond Town Centre* despite their falling within the surviving historic boundary of the Old Deer Park, despite their inclusion within the grade I *Royal Botanic Gardens Kew Registered Park*, despite their location on the north side of the deep railway-cutting that separates the Park from The Green and the historic heart of the Town, despite the designation of the Car-park as Metropolitan Open Land, and despite repeated representations in past years by groups in the local community questioning the designation of this part of the Park within an *Area of mixed use*. The present, anomalous designation clearly prejudices its protection from inappropriate urban development, as reflected in proposals submitted in recent years for the development of a below-ground supermarket located below a 'green blanket'.

- 3.10 The Working Group urges the Inspector to recommend that the Old Deer Park Car-park, the land to the immediate south of the Old Deer Park Car-park extending down towards the railway (on which the single-storey buildings occupied by voluntary groups stand); and the Royal Depot and former TA Centre, should be removed from the boundary of the Richmond Town Centre.

THE BOUNDARIES OF METROPOLITAN OPEN LAND, PUBLIC OPEN SPACE AND THE RICHMOND TOWN CENTRE - SUMMARY

- 3.11 In summary, the Group urges the Inspector to recommend that the relevant boundaries should be amended as follows:

- To include the listed *Pools-on-the-Park* swimming pools complex and its landscaped grounds and adjacent car-park; the land to the immediate south of the Old Deer Park car-park extending down towards the railway (on which the single-storey utility buildings occupied by voluntary groups presently stand); and the carriageway and footways of the Twickenham Road, as Metropolitan Open Land.
- To include the listed *Pools on the Park* swimming pools complex and its landscaped grounds and adjacent car-park; the entirety of the Old Deer Park Car-park; the land to the immediate south of the Old Deer Park Car-park extending down towards the railway (on which the single-storey buildings occupied by voluntary groups stand); as Public Open Space.
- To remove the Old Deer Park Car-park; the land to the immediate south of the Old Deer Park Car-park extending down towards the railway (on which the single-storey buildings occupied by voluntary groups stand); and the Royal Mail Depot and former TA Centre from designation as part of the Town Centre.

The existing boundaries of all these areas are shown on the Council's *Local Plan Proposals Map, Adopted July, 2015*, and in outline of the Working Group's *The Old Deer Park, Richmond – Re-connecting the Town to its local park – Realising an under-recognised parkland asset – A framework for future conservation and enhancement*. A copy of the report is attached as Appendix B.

THE ABSENCE OF REFERENCES TO *THE OLD DEER PARK, RICHMOND: THE CROWN ESTATE LANDSCAPE STRATEGY* (Council references 113, 118, 448 and 451)

- 3.12 The Group views with considerable regret the continuing resistance of the Council to include references to *The Old Deer Park, Richmond: The Crown Estate Landscape Strategy* under Policy LP 5 – Views and vistas, Policy LP 6 – Royal Botanic Gardens, Kew World Heritage Site, Site specific proposal SA 22 – Pools on the Park and surroundings, Old Deer Park, Richmond, and Site specific proposal SA 23 – Richmond Athletic Association Ground. Old Deer Park, Richmond.

- 3.13 The Group does not accept the reasons stated by the Council for the continuing omission of references to this most important and still highly relevant conservation and planning document – not least, given the references to the similar *Royal Botanic Gardens Kew World Heritage Site Management Plan* and the *Royal Botanic Gardens Kew Landscape Management Plan*. Whilst the Group notes that the *Crown Estate Landscape Strategy* contains limited references to planning policies that have now been superseded in the very brief Section 10, the substantial part of the document remains highly relevant, it sees no reason why references cannot be made to the document, with a brief note regarding the policies cited in Section 10. The Group urges the Inspector to address this significant omission and recommend the inclusion of references to *The Old Deer Park, Richmond: The Crown Estate Landscape Strategy*.

THE WORDING OF POLICIES LP 6 AND LP 14 (Council references 118 and 168)

- 3.14 The Working Group notes with considerable regret the continuing resistance of the Council to amend the wording of new Policy LP 6 – Royal Botanic Gardens Kew World Heritage Site to recover reference to ‘working with others’ and to include reference to *The Old Deer Park, Richmond: The Crown Estate Landscape Strategy*. The Group urges the Inspector to address these omissions and recommend their resolution, given the clear need for effective participation by the Crown Estate, leaseholders, national and other agencies and local community groups in the care, conservation and management of the World Heritage Site and its buffer-zone in order to secure the policy objective.
- 3.15 The Group notes with considerable regret the continuing resistance of the Council to amend – in the interests of clarity and certainty - the wording of new Policy LP 14 – Other Open Land of Townscape Importance to amend the heading of the policy and the relevant parts of the policy to refer to ‘Other open land of townscape and landscape importance’. Such a modest adjustment would extend appropriate protection to open land within the Park (and in other parts of the Borough) which falls outside Metropolitan Open Land designation but nevertheless possesses particular landscape interest and significance (as distinct from ‘townscape interest’. The Group urges the Inspector to address this issue and recommend that the heading and wording of the policy should be amended accordingly.

THE WORDING OF SITE-SPECIFIC PROPOSALS SA 22 AND SA 23 (Council references 448 AND 451)

- 3.16 Whilst noting that detailed guidance on the potential development of the respective sites will be provided in the proposed *Old Deer Park Supplementary Planning Document*, the Working Group notes with considerable regret the continuing resistance of the Council to amend the wording under both Site-specific Proposals SA 22 – Pools on the Park and surroundings, Old Deer Park, Richmond and SA 23 –

Richmond Athletic Association Ground, Old Deer Park, Richmond - as urged by the Group in its formal submission of August, 2016.

SITE SPECIFIC PROPOSAL SA 22

- 3.17 In relation to Site-specific Proposal SA 22 relating to the Pools-on-the Park complex, the Group remains concerned by the absence of wording to the effect that any proposed improvements or upgrading of the existing facilities and any additional leisure facilities, community and other complementary uses should ensure the preservation of the special interest of the existing listed complex and its setting, and sustain their significance; preserve or enhance the character or appearance of the conservation area and the World Heritage Site buffer-zone, and sustain their significance; and respect the parkland character of the adjacent Metropolitan Open Land, avoiding encroachment into the area beyond the boundary of the site and the existing public sports changing-rooms and club-room building and the largely redundant and derelict Council maintenance-depot for the Park. The Group also remains concerned by the absence of wording to the effect that any proposed development should have full regard to the relevant policies set out in the Crown Estate's *The Old Deer Park Richmond – Landscaping Strategy*.
- 3.18 In the interests of clarity and certainty, the Group urges the Inspector to recommend appropriate amendment of the wording of the proposal.

SITE SPECIFIC PROPOSAL SA 23

- 3.19 In relation to Site-specific Proposal SA 23 relating to the Richmond Athletic Association ground, the Group remains concerned by the absence of wording to the effect that any proposed improvements or upgrading of the existing facilities and any additional leisure facilities and other complementary uses should ensure the preservation of the special interest of the existing listed pavilion/grandstand and its setting, and sustain their significance; preserve or enhance the character or appearance of the conservation area and the World Heritage Site buffer-zone, and sustain their significance; and respect the parkland character of the Metropolitan Open Land, avoiding encroachment into the area beyond the boundary of the site.
- 3.20 In the light of significant unauthorised development, both today and in the past, the Working Group also remains concerned by the absence of wording to the effect that only car-parking directly relating to the primary use of the site for recreation use shall be permitted and should be extensively landscaped to reflect the significant location of the site within the Park, and that the potentially adverse effects of any floodlighting of pitches should be mitigated in order to protect the significance of the site as an integral part of the Old deer Park and the amenity of nearby local residents. The Group is further concerned by the absence of wording to the effect that any proposed development should have full regard to the relevant policies set out in the

Crown Estate's *The Old Deer Park Richmond – Landscaping Strategy*. In the interests of clarity and certainty, the Group urges the Inspector to recommend appropriate amendment of the wording of the proposal.

4. ADDITIONAL NOTE

- 4.1 The Working Group remains entirely willing to provide copies to the Inspector of any of its submissions to the Council and to clarify any of the issues it has raised in this submission. In addition, the Group would wish to encourage the Inspector to undertake a site inspection of key parts of the Old Deer Park in order to appreciate its considerable architectural, historic and landscape interest and significance, and to recognise the need to ensure that sound policies are in place to ensure that such interest and significance will be effectively sustained in accordance with the relevant policies of the *National Planning Policy Framework*.



Paul Velluet

4th September, 2017.

APPENDIX A - THE CONSTITUENT MEMBERS OF THE WORKING GROUP

THE RICHMOND SOCIETY

The Richmond Society was founded in 1957 and has a long established reputation for positive engagement in local conservation, development and planning issues. The Society has charitable status and has approaching one thousand paid members, generally without restriction. The Society encourages an active interest in Richmond and its community. It is run by a committee of volunteers who communicate with members through regular newsletters and meetings. Its interests include the natural and built environment, infrastructure which includes roads, transport and aircraft, and uses of Richmond town and surrounds in terms of licensing, policing, cleansing and events. The Society campaigns to preserve and enhance Richmond's historic character and the quality of life for residents and visitors. It arranges events for social interaction and enjoyment of its members and the public. It works with other amenity groups and the Council and other public bodies. It covers no defined geographical area but focuses on Richmond Town and its surrounds, including the associated stretch of the River Thames. It has sound finances and raises funds from subscriptions, legacies and campaigns. The money raised is used to run the charity and to invest in projects that benefit the community.

THE KEW SOCIETY

The Kew Society, founded more than one hundred years ago, is an influential organisation dedicated to enhancing the beauty of Kew and preserving its heritage. It became a Society in the 1970s and a Registered Charity in 1987 and remains as one of the larger and more active community groups in Greater London, with a subscribed membership of around six hundred. Its main aims are to review all planning applications in Kew with special regard to the architectural integrity and heritage of the neighbourhood and to play an active role in the improvement of local amenities. To achieve its aims, The Kew Society works closely with local authority councillors and the Member of Parliament; monitors all the planning applications and comments as needed; makes representations to public and private organisations; and provides a forum for local groups to strengthen Kew's voice in the area and in London. The Society is run by unpaid volunteers. The Executive Committee meets eleven times a year while sub-committees look after particular areas of interest. The society organises community events including parties, picnics, lectures and outings and produces the *On Kew* newsletter with information about general local issues, events, planning matters and forthcoming activities.

THE FRIENDS OF RICHMOND GREEN

The Friends of Richmond Green is an amenity action group. It operates for the benefit of residents located in the immediate vicinity of The Green. In geographical terms, the FoRG 'constituency' encompasses the area bounded by the triangle of the railway line, the river Thames and George Street. Its key aims and objectives are: To promote public interest and civic pride in Richmond Green and vicinity; To improve the quality of life and long-term attractiveness for residents; To improve the character and quality of the built and natural

environments; and To encourage responsible use of The Green and surrounding area. FoRG was started over forty years ago and has worked with the Council and other local groups on a number of projects – major improvements to the pedestrian Gateway to Richmond between Old Deer Park and Richmond Green; the up-grading of the network of paths on the Green. The RHC, convened by Friends of Richmond Green and the Richmond and Kew Societies, amalgamates and co-ordinates the efforts of the three bodies to more effectively represent our mutual interests as far as Heathrow expansion and related proposals are concerned. FoRG successfully lobbied the Council to revise the daily timetable for litter collection and in the last couple of years we have seen major improvements in this area. Membership is open to any person who resides in the immediate vicinity of the Green. We do not currently levy any form of charge on our members. Management is vested in an Executive Committee which meets around 8 times a year. The committee and officers are elected each year at an AGM. A newsletter is produced annually.

THE FRIENDS OF OLD DEER PARK

Established in 1987, The Friends of Old Deer Park is a group within the local community constituted with the overall aims of fostering, promoting and sustaining recognition and appreciation of the unique parkland character, amenity value, and particular historic, architectural, archaeological and ecological interest of the Old Deer Park, and securing its preservation and enhancement for the benefit of all. The Friends played an important role in supporting the establishment of the working group for *The Thames Landscape Strategy* in 1991, and successfully worked for and secured the designation of the Old Deer Park by the London Borough of Richmond upon Thames Council as a conservation area in June, 1990, the inclusion of the Old Deer Park on English Heritage's *Register of Parks and Gardens of Special Historic Interest* (as an integral part of the already registered grade I Royal Botanic Gardens, Kew historic landscape) in June, 1998, and its inclusion within the buffer-zone of *The Royal Botanic Gardens, Kew World Heritage Site* in 2003, and the listing of the 1960s *Richmond Swimming Pools* complex in January, 1996, and the late-Victorian sports pavilion/grandstand in the grounds leased by *Richmond Athletic Association* in November, 1997.

THE ST MARGARET'S ESTATE RESIDENTS ASSOCIATION

The St Margaret's Estate Residents Association was established some forty years ago to protect and conserve the area that originally covered the St Margaret's Estate of 1854. The Association includes approximately 330 houses, mainly within the area bounded by the A316, St Margaret's Road, Kilmorey Road and Ranelagh Drive which looks over the river onto the Old Deer Park. The main remit of the Association is to monitor all planning applications within the boundaries of the Association and it also monitors tree lopping and felling, traffic, aircraft noise and any other matter that affects the environment.

OLD DEER PARK DRAFT SUPPLEMENTARY PLANNING DOCUMENT, DECEMBER, 2017

A RESPONSE BY THE OLD DEER PARK WORKING GROUP TO CONSULTATION

JANUARY, 2018

I. INTRODUCTION

- I.1 The Old Deer Park Working Group (the Group) comprises representatives of The Richmond Society, The Kew Society, The Friends of Richmond Green, The Friends of Old Deer Park and The St Margaret's Estate Residents Association. This submission represents the joint response from the five groups.
- I.2 The Group welcomes the publication and consultation on a significantly amended and extended draft Supplementary Planning Document for the Old Deer Park further to the publication and consultation on an earlier draft in October, 2016, on which the Group commented in its submission of the 4th November, 2016. The Group welcomes the satisfactory resolution of the significant anomalies and omissions contained in the earlier draft document identified in the Group's response of November, 2016. The Group commends the authors on the drafting of the revised draft document and for responding positively to the issues raised by the Group at the earlier stage.
- I.3 The Group was formed in 2012 in recognition of the importance of the Old Deer Park and has since been working on immediate issues and on encouraging the preparation of a coherent strategy for the effective conservation, development and management of the Park. The Group started by publishing the report: *The Old Deer Park, Richmond - Re-connecting the Town to its local park - Realising an under-recognised parkland asset – A framework for conservation and enhancement.*
- I.4 The Working Group supports the potential adoption of the draft document subject to the various issues raised in sections 2 to 5 below, and looks forward to adjustments being effected to the present draft that will enable it to convey full support. In addition to setting out our detailed response to the draft document, we have included answers to the eight specific tick-box questions posed in the Council's questionnaire. These should be read in conjunction with our detailed response to the document.
- I.5 In order to assist in easy and ready use and understanding of the document by stakeholders, the public and others and its effective application of the guidance it contains, the Working Group suggests that the document should be printed at A.4 size, with the text in portrait format and the maps in landscape format; the structure of sections, sub-sections and subsidiary sections made clearer (with the point-sizes of their headings adjusted accordingly); and the paragraphs numbered.

- 1.6 The Group would be pleased to discuss its submission with the Council and to provide further information, if requested. Contact: Peter Willan, Chair - The Old Deer Park Working Group at willan829@btinternet.com.

2. THE TERMS USED IN THE DOCUMENT

- 2.1 The Group suggests that the publicly accessible park leased by the Council from the Crown Estate to the north-west and south-east of the Twickenham Road should be referred to throughout the document as the Public Park rather than the Recreation Ground – a term normally associated with modestly scaled, local authority owned public open-spaces of no or only minimal historic and landscape significance used primarily for outdoor sport and walking dogs.
- 2.2 We note the proposed use of the recently adopted term ‘The Old Deer Park Sports Ground’ for that part of Old Deer Park adjacent to the Kew Road immediately to the south of the Royal Botanic Gardens presently used by Richmond Cricket Club, London Welsh Rugby Football Club, The Mid-Surrey Bowling Club, Richmond Tennis Club and The Royal Richmond Archery Club.
- 2.3 We would suggest that in order to avoid confusion, the term ‘The King’s Observatory’ should be used consistently throughout the document. The term ‘Kew Observatory’ was used at the time that the building and surrounding site was used by the Meteorological Office and when the building was first listed in January, 1950. The term ‘The Royal Observatory’ is used in the description accompanying the formal registration of the historic park, and the term ‘King’s Observatory’ used in the description accompanying the formal scheduling of Shene Charterhouse.

3. THE ROLE OF THE DOCUMENT

- 3.1 We note and recognise the aim of the document as stated in Section I – Introduction: ‘...To provide an integrated framework which supports the conservation and enhancement of the Old Deer Park as a historically important and well used recreational and community area of the Borough’, and that the document ‘identifies opportunities to support its maintenance and enhancement’. However, as will be recalled, since 2012 the Working Group has been pressing for ‘a coherent strategy for the effective conservation, development and management of the Park’.
- 3.2 In order to strengthen the document, we urge adjustment in the wording in the first paragraph in Section I to read: ‘...The SPD will ensure that any prospective developments on these sites are sensitive to the significance of the historic landscape

of the Park and the features it contains whilst supporting the important recreational and sporting community activities within it.’

- 3.3 Whilst recognising the approach to implementation and delivery set out in Section 6 of the document, we very much hope that in due course the Council’s Supplementary Planning Document will be complemented by the preparation and publication of a coherent management plan for the Park for potential adoption by the Crown Estate as freeholder and all the lessees including the Council, providing for the realisation of opportunities for the enhancement of the Park and the effective maintenance and repair of its historic features and structures. Such a document should usefully draw upon Kim Wilkie Associates’ still highly relevant *Old Deer Park, Richmond, The Crown Estate Landscape Strategy*, published in September, 1999.

4. THE BOUNDARY OF THE AREA COVERED IN THE SUPPLEMENTARY PLANNING DOCUMENT

- 4.1 We note and recognise the logic of the boundary of the Supplementary Planning Document covering the same boundary as the presently designated Old Deer Park Conservation Area. However, we would urge the inclusion of a statement within either Section 1 or 2 of the document drawing attention to the fact that anomalously, some areas of the historic Park have been excluded from the Old Deer Park Conservation Area – such as the entire area to the south-east of the railway viaduct and embankment adjacent to Old Palace Lane, including the allotments, and the small area at the north-western end of Old Deer Park Gardens. Whilst, the entire area to the south-east of the railway viaduct and embankment falls within the boundary of the Richmond Riverside Conservation Area and, in part, within the boundary of the formally registered Historic Park, we would suggest that the areas presently and anomalously falling outside the boundary of the Old Deer Park Conservation Area should be embraced within the Supplementary Planning Document.

5. DETAILED POINTS FOR ATTENTION

- 5.1 **Section 2 – The Site and its surroundings – Historic context – The evolution of the Old Deer Park – (page 8) – first paragraph, sixth line: ‘Shene’ NOT ‘Sheen’.**
- 5.2 **Section 2 – The Site and its surroundings – Historic context – The evolution of the Old Deer Park – (page 8) - second paragraph, third line: ‘King’s’ NOT ‘Kings’.**
- 5.3 **Section 2 – The Site and its surroundings – Historic context – The evolution of the Old Deer Park – (page 8) - fourth paragraph, seventh line: ‘Commissioners of Woods and Forests’ NOT ‘Commissioner of Woods’.**

- 5.4 **Section 2 – The Site and its surroundings – Historic context – The evolution of the Old Deer Park – (page 8) - fifth paragraph, seventh and eighth lines:** ‘...and Athletic Association’ NOT ‘...Athletics Association’; ‘...Athletic Ground’ NOT ‘Athletics Ground’.
- 5.5 **Section 2 – The Site and its surroundings – Historic context – The evolution of the Old Deer Park – (page 8) - sixth paragraph, sixth line:** ‘...the Richmond Athletic Association Ground’ NOT ‘...the Richmond Athletics Association Ground’.
- 5.6 **Section 2 – The Site and its surroundings – Historic context – The evolution of the Old Deer Park – (page 8) - seventh paragraph:** Add: ‘The renowned Richmond Royal Horse Show flourished until 1967’.
- 5.7 **Section 2 – The Site and its surroundings – Historic context – The evolution of the Old Deer Park – (page 8) - eighth paragraph, second and seventh lines:** ‘...the Athletic Ground’ NOT ‘...Athletics Ground’; ‘...Richmond Athletic Association’ NOT ‘...Richmond Athletics Association’.
- 5.8 **Section 2 – The Site and its surroundings – Historic context – Heritage assets - (page 8):** ‘The King’s Observatory (previously known as Kew Observatory) NOT ‘Kew Observatory’; ‘Three obelisks’ NOT ‘Obelisks’.
- 5.9 **Section 2 – The Site and its surroundings – Historic context – Figure 3: Heritage assets - (page 9):** The listed obelisk located close to The King’s Observatory within the Royal Mid-Surrey Golf Club course (one of the two, listed obelisks within the course) has been omitted from the map. Instead the small, unlisted obelisk within the publicly accessible part of the Park has been shown. We very much hope that it can be identified as a ‘Building of Townscape Merit’ and added to the *National Heritage List* in due course.
- 5.10 **Section 2 – The Site and its surroundings – Historic context – Landscape views and open space - (page 10) - Third paragraph:** Reference is made to the Council’s *Local Plan Proposals Map* of July, 2015. As the group has argued at the recent hearings into the *Draft Local Plan*, NO amended *Proposals Map* has been published and made subject of consultation with the latest version of the *Local Plan*. The Working Group remains firmly of the view that the anomalous boundaries of Metropolitan Open Land and Public Open Space shown in the *Proposals Map* of July, 2015 which exclude the Pools-on-the-Park complex need to be corrected.
- 5.11 **Section 2 – The Site and its surroundings – Historic context – Figure 5: Transport and accessibility - (page 11):** Anomalously, the two sets of bus-stops close to Richmond Station which serve no less than twelve bus-routes, and which those wishing to access the Park would use, have been omitted. The bus-stops on the south-eastern side of Kew Road opposite the Lion Gate into Kew Gardens, opposite the Old Deer Park Sports Ground and further south-westwards along the road have been omitted.

Richmond Station is wrongly annotated 'Richmond Rail Station' and no reference is made to its being served by South Western Railway, London Underground and London Overground trains, and by a taxi rank. Anomalously, a number of the long-established pedestrian access-points into the Park are omitted. These include the access from the south-western end of Park Lane, the several access points along Kew Foot Road, and the two entrance-points from Kew Road.

- 5.12 **Section 3 - Planning policy context – Local planning policy - (page 12) - Third paragraph, Eighth line:** Reference is made to 'The Publication Local Plan' taking 'into account responses made during the public consultation in summer 2016'. Regrettably this is not correct, given the failure of the Council to properly address the Working Group's repeated and clearly expressed concerns about the anomalous boundaries of Metropolitan Open Land and Public Open Space shown in the *Proposals Map* of July, 2015 which exclude the Pools-on-the-Park complex.
- 5.13 **Section 3 - Planning policy context – Key planning policies, Local Plan, 2017 - (pages 11 and 12):** Adjustments in wording need to be made to reflect the proposed main modifications relating to Policy LP3 and site specific allocations SA 22 and 23 (relating to The Pools-on-the-Park and the Richmond Athletic Association Ground) put forward by the Council (and currently subject to public consultation) in response to the main modifications to the *Local Plan* recommended by the Inspector further to the hearings held late last year. Further adjustments to the wording may need to be made in the light of the outcome of the public consultation on the proposed main modifications.
- 5.14 **Section 3 - Planning policy context – Other information policies – (page 14):** The Working Group considers it most regrettable that given its strategic significance, Kim Wilkie Associates' still highly relevant *Old Deer Park, Richmond, The Crown Estate Landscape Strategy*, published in September, 1999, has been relegated to the tail end of the schedule of 'Other information sources'. It is likely that J.S. Conservation Management & Town Planning Ltd's *Statement of significance: Richmond Public Baths (sic), Old Deer Park, Richmond* may require amendment before it can be adopted by the Council.

The list needs to be extended to include reference to the formal entries and descriptions for the various designated assets in the Park included in the *National Heritage List for England*.

- 5.15 **Section 4 – Analysis of the current facilities across the Old Deer Park – Wider considerations – Recreation ground (sic) - (page 16):** Reference is rightly made to the challenges posed by the use of the Park for large-scale outdoor sporting events and the problems generated by the provision of temporary access for large vehicles for setting-up and taking-down temporary structures, etc. However, as presently drafted, neither this section nor Section 5 – The future role of the Old Deer Park, provide any

clear and specific guidance on how such events together with circuses and temporary use of the landscaped area around the Pools-on-the-Park should be planned, located and managed in order to ensure that the parkland character of the area is not compromised or harmed

We note with concern the apparent absence from both Sections 4 and 5 of references to the issue of noise-generation from the Old Deer Park and the need to explore and adopt measures to mitigate the adverse impact of such noise generation on the parkland character of the areas to the north-west and south-east of the Twickenham Road.

- 5.16 **Section 4 – Analysis of the current facilities across the Old Deer Park - Outdoor sports provision – Old Deer Park Sports Ground (London Welsh Rugby Football Club) – (page 18):** There is one match pitch and two training-pitches – one of which can be floodlit.
- 5.17 **Section 4 – Analysis of the current facilities across the Old Deer Park - Indoor sports facilities – Swimming – (page 18) - First paragraph, third line:** The outdoor pool is 25 m. in length, NOT 33.3 m.
- 5.18 **Section 4 – Analysis of the current facilities across the Old Deer Park - Indoor sports facilities – Swimming – (page 18) - First bullet-point:** We note the suggestion that the age of the Pools-on-the-Park complex ‘creates concerns over its ability to meet the needs of residents in the long term’. However, we would observe that there are many listed and other historic swimming pools across the country very much older than the Pools-in-the-Park complex which continue to function successfully with or without significant upgrading.
- 5.19 **Section 4 – Analysis of the current facilities across the Old Deer Park - Indoor sports facilities – Swimming – (page 18) - Seventh bullet-point:** It is difficult to see how the provision of a 50m. pool can be accommodated on the Pools-on-the-Park Site given the conservation and other planning constraints referred to elsewhere in the document.
- 5.20 **Section 4 – Analysis of the current facilities across the Old Deer Park – Health and fitness facilities – (page 20):** Anomalously, as presently drafted, the document fails to refer to the poor design and harmful impact on the character and appearance of the Park of the existing health and fitness facility, squash courts and adjacent car-parking on the Richmond Athletic Ground and the squash courts on the Old Deer Park Sports Ground, and the need to resolve the problems.
- 5.21 **Section 4 – Analysis of the current facilities across the Old Deer Park – Community and voluntary sector uses – Old Deer Park Car-park - (page 20):** Anomalously, as presently drafted, the document fails to refer to the poor design and harmful impact on the character and appearance of the Park of the existing Council-owned voluntary

sector buildings – some now disused and derelict AND the poor condition of the Council-owned, long disused public conveniences, and the need to resolve the problems.

- 5.22 **Section 4 – Analysis of the current facilities across the Old Deer Park – Wider considerations - Royal Mid-Surrey Golf Club – (page 21) - Third paragraph – First and seventh lines:** Reference is made to ‘The service road and access located along the boundary between the Golf Course and the Royal Botanic Gardens, Kew...’.

Firstly, it is entirely misleading to refer to the vehicular access from the Kew Road just south of the Lion Gate leading to the Oxenhouse Gate to the Gardens and further beyond to the Golf Course as a ‘road’. It is effectively an un-made drive. Secondly, it isn’t located between the Golf Course and the Gardens, rather it is located between the Old Deer Park Sports Ground and the Gardens, and only continues onwards modestly into the Golf Course.

Importantly, we understand that the emerging, revised *Royal Botanic Gardens, Kew, Landscape Management Plan* no longer proposes the creation of a link between the Kew Road and the river along the southern boundary of the Gardens.

- 5.23 **Section 4 – Analysis of the current facilities across the Old Deer Park – Wider considerations - Recreation ground (sic) – (page 21):** The statement fails to refer to the parkland character and ecological interest of much of the area and the particular attractiveness of the ‘wild’ and wooded area between the Twickenham Road and the railway, used by many walkers, and along the banks of the water-filled ha-ha.

- 5.24 **Section 4 – Analysis of the current facilities across the Old Deer Park – Wider considerations – The Old Deer Park Car Park and public open space – (page 21) - First paragraph:** Reference should be made to damaging impact on the character and appearance of the Park resulting from the excessive and poorly designed signing and the lack of a co-ordinated approach to the design and finish of the street-furniture.

- 5.25 **Section 4 – Analysis of the current facilities across the Old Deer Park – Wider considerations – The Old Deer Park Car Park and public open space - (page 21) - Second paragraph:** What does ‘the public open space offer of the Park’ mean? Surely the area represents a much valued and attractive parkland area and is a major asset to the Park as a whole? Importantly, it is NOT ‘little used’. It is well used, particularly by dog-walkers.

- 5.26 **Section 5 - The future role of the Old Deer Park – (page 22) – First paragraph:** In order to strengthen the document, we would suggest adjustment in the wording of the paragraph to read: ‘There are opportunities to sustain the significance of the historic landscape of the Park and the features it contains as well as supporting its wildlife and nature conservation role, improving the existing sports, recreation and community facilities and enhancing access into and around the Park’.

5.27 **Section 5 - The future role of the Old Deer Park – (page 22) – Third paragraph:** The reference to ‘opportunities for wider enhancements’ needs clarification.

5.28 **Section 5 – The future role of the Old Deer Park – Improving the quality of the Old Deer Park – (page 22):** We would observe that there are further issues that might be listed in addition to those identified in the six bullet-points.

The section should provide a clear commitment by the Council to using its planning powers to apply rigorous control over proposals for built development encroaching into the historic Park (and on to Metropolitan Open Land) – recent examples being part of the group of porta-cabins comprising the Old Deer Park School adjacent to the Old Deer Park Car-park annexe and the porta-cabin serving the care-hire business in the Athletic Ground.

Similarly, the section should provide for a clear commitment by the Council to use its planning powers to pursue enforcement action against existing unauthorised development within the Park where it has a damaging impact on the character and appearance of the Park, and to pursue appropriate action to secure the repair of its own properties and encourage the repair of properties outside its ownership where it has damaging impact on the character and appearance of the Park.

5.29 **Section 5 – The future role of the Old Deer Park – Improving the quality of the Old Deer Park – Gateways – (page 25) - Second paragraph, fourth line:** ‘...through the side-gate of a well restored, late-Victorian gateway comprising the four, original, brick piers with modern, steel gates between’ NOT ‘...a pillared and gated entrance’. Surely, given the modest width of the pedestrian side-gate, it should not be used for cyclists – other than when dismounted.

5.30 **Section 5 – The future role of the Old Deer Park – Improving the quality of the Old Deer Park – Gateways - (page 23) - Third paragraph, third line:** ‘...surviving gate-piers of the original four’ NOT ‘surviving gate pillars’. A commitment to reinstate the two, missing gate-piers for both pedestrian safety and conservation reasons should be added. (A similar arrangement as that successfully implemented in relation to the gateway on to The Green).

5.31 **Section 5 – The future role of the Old Deer Park - Improving the quality of the Old Deer Park – Enhancements to car park areas – (page 23):** Surely there should be specific reference to address the excessive and poorly designed signing and the lack of a co-ordinated approach to the design and finish of the street-furniture and adopt an approach consistent with the Council’s own *Public Space Design Guide* of 2006.

5.32 **Section 5 – The future role of the Old Deer Park – Improving access within the Old Deer Park - Pedestrian access - (page 24):** The inclusion of one or more annotated diagrams in the document to show potential opportunities for improving and enhancing safe pedestrian access to and from the Park would be of considerable value

in advancing proposals. In particular, it would be most useful to include schematic proposals for:

- The provision of a raised, timber board-walk at the south-western end of that part of the Park between the railway viaduct and the embankment carrying the Twickenham Road and the landward-arch of Twickenham Bridge facilitating access between the two parts of the public Park when the area is flooded.
- The creation of a safe and attractive pedestrian route through the Old Deer Park Car-park linking the access from Park Lane to that part of the Park between the railway and the Twickenham Road. And
- The creation of inclined pathways set within the embankments to each side of the Twickenham Bridge approach to facilitate pedestrian access between the footways on each side of the road and the areas of the Park to each side of the road at the lower level.

- 5.33 **Section 5 – The future role of the Old Deer Park – (page 28):** The heading ‘Old Deer Sports Ground’ is missing from the top of the page.
- 5.34 **Section 5 – The future role of the Old Deer Park: Pools on the Park – (page 29) - First paragraph, second line:** ‘...with landscaped amenity areas adjacent to the outdoor pool’ NOT ‘with lawned sunbathing outdoor areas’.
- 5.35 **Section 5 – The future role of the Old Deer Park: Pools on the Park – (page 29) - Second, third, fourth, fifth, sixth, seventh and eighth paragraphs:** As noted in paragraph 5.14 above, J.S. Conservation Management & Town Planning Ltd’s *Statement of significance: Richmond Public Baths (sic), Old Deer Park, Richmond* may require amendment before it can be adopted by the Council.
- 5.36 **Section 5 – The future role of the Old Deer Park: Richmond Athletic Ground - (page 29):** As suggested in paragraph 5.20 above, as presently drafted, the document fails to refer to the poor design and harmful impact on the character and appearance of the Park of the existing health and fitness facility, squash courts and adjacent car-parking on the Richmond Athletic Ground and the need to resolve the problems.
- 5.37 **Section 5 – The future role of the Old Deer Park: Car park and community uses within the Old Deer Park – (page 30) – Twelfth paragraph:** The building presently occupied by the Royal Mail adjacent to the gateway into the Park from Park Lane comprises the former East Surrey Regiment TA Drill Hall of 1912 and its annexe of 1932 - both built on land falling within the historic park – as clearly evident from the 18th century boundary-wall to the Park which runs behind the complex. Whilst we understand that the lease on the complex granted by the Crown Estate runs until October, 2070, there is a real possibility that the Royal Mail may surrender the lease at

some earlier stage. Accordingly, consideration should be given to embracing within the document the potential future of the site for appropriate re-use and development, retaining and incorporating the architecturally and historically significant 1912 Drill Hall building. We note that anomalously, it is stated without question that the building ‘continues to be needed to support the operational requirements of the (Royal Mail) business and therefore has not been identified as part of the any wider proposals’.

- 5.38 **Section 5 – The future role of the Old Deer Park: Figure 5 (sic): Area of focus for potential change – (page 31):** This annotated map should be titled ‘Figure 6’ and references to it adjusted accordingly – ‘Figure 5: Transport and accessibility’ already exists on page 11.

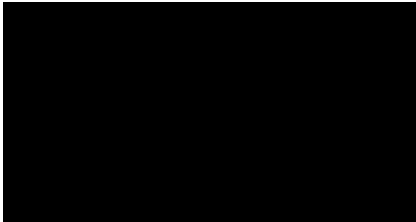
As noted in paragraph 5.9 above, the listed obelisk located close to The King’s Observatory within the Royal Mid-Surrey Golf Club course (one of the two, listed obelisks within the course) has been omitted from the map. Instead, the small, unlisted obelisk within the publicly accessible part of the Park has been shown. We very much hope that it can be identified as a ‘Building of Townscape Merit’ and added to the *National Heritage List* in due course.

- 5.39 **Section 6 – Implementation and delivery – (page 32) - Tenth bullet point:** We remain unclear about the reference to London Scottish, London Welsh and Richmond Rugby Football Club working ‘with the Council to maximise the current capacity of the rugby pitches within the Recreation Ground (sic)’.

- 5.40 **Section 6 – Implementation and delivery – (page 32) - Twelfth bullet point:** In relation to the Council working with the Crown Estate, we would refer to our comments set out in paragraph 3.3 above:

‘Whilst recognising the approach to implementation and delivery set out in Section 6 of the document, we very much hope that in due course the Council’s Supplementary Planning Document will be complemented by the preparation and publication of a coherent management plan for the Park for potential adoption by the Crown Estate as freeholder and all the lessees including the Council, providing for the realisation of opportunities for the enhancement of the Park and the effective maintenance and repair of its historic features and structures. Such a document should usefully draw upon Kim Wilkie Associates’ still highly relevant *Old Deer Park, Richmond, The Crown Estate Landscape Strategy*, published in September, 1999’.

In this connection, we would suggest that Kim Wilkie should be consulted on the final draft of the present Supplementary Planning Document before its adoption.



22nd January, 2018.

Dear 

**THE POOLS-ON-THE-PARK COMPLEX, OLD DEER PARK, RICHMOND - DRAFT
STATEMENT OF SIGNIFICANCE**

1. Many thanks for providing the opportunity of commenting informally on JS Conservation Management & Town Planning Ltd's draft *Statement of Significance: Richmond Public Baths, Old Deer Park, Richmond* of September, 2017, commissioned, I assume, by the Richmond-upon-Thames Council, and running in parallel with public consultation on the revised draft *Old Deer Park Supplementary Planning Document* launched in early December and closed today.

2. I very much welcome the preparation of the draft document and anticipate that it will also be welcomed by the Old Deer Park Working Group. In this connection, I will relay any additional comments by members of the Working Group at the earliest opportunity.

3. I particularly value the opportunity of commenting on the draft document: as a user of the pools complex since its opening in 1966; having known personally both Leslie Gooday, its architect, and Michael Brown, its landscape architect; having been directly involved in campaigning under the auspices of The Richmond Society and The Friends of Old Deer Park together with the Save Richmond Pool Action Group in 1987-1989 against proposals for its complete demolition and redevelopment as part of a vastly over-sized and poorly designed indoor skating-rink and swimming-pool complex with multi-level car-parking put forward by developer, London and Edinburgh Trust and granted Planning Permission under highly

questionable circumstances by the former SDP-Liberal Alliance Council administration in March, 1989, despite the opposition of the Royal Fine Art Commission and the local community; having been directly involved with the Friends of Old Deer Park in securing the designation of the Old Deer Park as a conservation area in June, 1990, and, up to 1993, having been involved with the Friends in securing the designation of the Park as an extension to the grade I Royal Botanic Gardens, Kew registered historic park in January, 1994; and, up to 1993, having been directly involved with The Friends of Old Deer Park in working to secure the formal listing of the existing complex in January, 1996.

4. At the outset, may I confirm that I support for the principle of addressing and assessing the potential scope for a conservation-based development of the site aimed at preserving the significant parts and features of the existing, listed pools complex and its landscaped setting whilst introducing sensitively designed improvements and appropriately scaled additions aimed at equipping the complex to meet the needs of coming years.

5. Whilst I support much of the assessment of the relative architectural and historic significance of the various parts of the existing pools complex and its landscaped setting set, both individually and cumulatively set out in limited part in Section 2 - *Statement of significance* and, anomalously, in greater detail in Section 3 – *Capacity for change*, and much of the assessment of the relative capacity for change to various parts of the existing complex and its landscaped setting set, both individually and cumulatively set out in Section 3 – *Capacity for change*, I am very disappointed by the serious omissions and other deficiencies in the *Introduction* and in Section 1 – *Understanding the heritage*, and believe that the document requires review and significant amendment before it can be properly and formally adopted by the Council.

6. I set out my specific concerns below:

THE TITLE OF THE DOCUMENT

7. The Pools-on-the-Park Complex has not been known as ‘Richmond Public Baths’ since at least 1993. Whilst the formal entry for the complex in the *National Heritage List for England* refers to the complex as ‘Richmond Baths’, the complex was appropriately rebranded as the ‘Pools-on-the Park’ at the time of its reopening after extensive refurbishment in July, 1993 and remains known as such over the years since. Up until the time of its closure for major repairs in October, 1992, the complex included twenty-four private baths for the use of those living in the area who did not have baths in their own homes. Accordingly, the term ‘Richmond Baths’ was not entirely inappropriate in past years.

8. The term ‘baths’ is used throughout the draft document, when it would be clearer and more correct to refer to ‘swimming-pools’, ‘pools’ or ‘pools complex’.

INTRODUCTION AND SECTION 1: UNDERSTANDING THE HERITAGE

9. From the considerable omissions and other deficiencies in these sections of the draft document, it would appear that the authors have neither spoken to those in the local community who have been closely involved with the pools complex over the last forty or more years nor read all the relevant publications and documentation covering those years – not least, about the controversy regarding the siting of the new pools complex in the Old Deer Park in the first place; the significant involvement of the Royal Fine Art Commission in the design of the complex (and, in later years, the campaign to secure its preservation from demolition); and the great campaign by the local community in the late-1980s and the 1990s to preserve the complex from demolition and redevelopment and to secure formal recognition of its special architectural and historic interest and that of its setting. This is a fundamental omission in relation to any proper assessment and understanding of the historic value, aesthetic value and communal value of the existing complex.

10. Throughout the draft document, particular emphasis is laid on ‘significance’ – to use the entirely non-statutory term used in the current policy document – the *National Planning Policy Framework* – and in the relevant current published guidance of Historic England. Anomalous, little if any reference is made to the inclusion of the pools complex in the *Secretary of State’s List of Buildings of Special Architectural or Historic Interest* nor to the formal inclusion of the Old Deer Park, in which the pools complex is set, in English Heritage’s *Register of Parks and Gardens of Historic Interest* as part of the grade I Royal Botanic Gardens, Kew – both designations now embraced by inclusion on the *National Heritage List for England*.

11. Similarly, anomalously, no reference is made in Section 1 to the specific entries and descriptions of the pools complex or to the Old Deer Park contained in the *National Heritage List for England*, nor importantly to the location of the complex and the Park within the formally designated Old Deer Park Conservation Area. The listing-entry for the pools complex is only attached as an Appendix, and the entry and description for the historic park is not attached at all. Only a very brief and incomplete reference is made to part of the description attached to the formal listing-entry in Section 2 – *Statement of significance* at page 17. A most serious omission from the draft document is the failure of the document to address the contribution made by the pools complex and its landscaped setting to the particular special historic interest AND significance of the registered historic park and to the character and appearance AND significance of the conservation area.

12. Similarly, no reference is made in either Section 1 – *Understanding the heritage* or, importantly, in Section 3 – *Capacity of change*, to the fundamental requirement under Section 16 of *the Planning (Listed Buildings and Conservation Areas) Act, 1990* to the fundamental requirement for the local planning authority or the Secretary of State to ‘have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses’ when considering an application for Listed Building Consent.

13. Anomalously, too, no attempt is made in Section I – *Understanding the heritage* to properly determine and define the extent of the curtilage of the listed pools complex and its landscaped setting and what may be properly considered as forming an integral part of the formally designated heritage asset. It is clearly essential that the boundary-walls of the landscaped setting of the pools complex and the sports changing building should be clearly shown as forming an integral part of the formally designated asset. In this connection, anomalously, no appropriately scaled map or site-plan of the entire pools complex and its landscaped setting is provided in the draft document with which to assist in a proper understanding of the extent of the curtilage. Similarly, no map is provided in the draft document to show the pools complex and its landscaped setting within the context of the Registered Historic Park or the conservation area - Figure 2 does not suffice for either purpose.

14. The absence of a detailed site-plan precludes any proper understanding of the critical role and particular and considerable special interest and significance of the boundary-walls of the landscaped setting of the pools complex, and, to a lesser extent, the role of the sports changing room. Importantly, the absence of such a site-plan means that the free-standing wall separating the pedestrian approach from the Twickenham Road to the main entrance from the adjacent car-park adjacent which was such an important feature of the original architectural and landscape design of the complex and which was only removed in recent years has been left entirely without comment. Similarly, the absence of a detailed site-plan also means that the regrettable subdivision of the once entirely unified landscaped setting of the pools complex in recent years is left entirely without comment.

15. Most regrettable is the absence of any meaningful references in the draft document to the boundary-wall to the landscaped setting of the pools complex which forms such a highly significant part of Michael Brown's design, and to the regrettable loss of the solid, slate copings to the wall which formed part of their particular special interest.

16. Quite extraordinarily, the draft document contains no plans or photographs of the pools complex and its landscaped setting as first completed in 1966. This is a major omission, which could be easily remedied by appending a copy of the 13-page, detailed and well-illustrated account of the complex published in the 1st November, 1967, issue of *The Architects' Journal* - 'Swimming baths in Old Deer Park, Richmond, Surrey'.

17. Similarly and extraordinarily, the draft document contains no decent architectural plans of the complex as it presently exists or any photographs of the external elevations of the complex as it presently exists. Such plans could be easily prepared by adjustments to the plans published in the 1st November, 1967, issue of *The Architects' Journal* - 'Swimming baths in Old Deer Park, Richmond, Surrey', assuming that the Council has mislaid copies of the original architects' drawings submitted in support of the application for Planning Permission and for other approvals.

18. The inclusion of such plans and photographs of the complex as first completed and as existing are essential to ensuring a clear and full understanding of the character and quality of the pools complex and its landscaped setting as first completed and the extensive changes that have been effected since - both externally and internally.

19. Such changes have included the most regrettable loss of the original, finely detailed patinated copper-sheet cladding of the upper part of the pools hall and lesser parts of the complex – the patination of the copper-sheet having been specifically intended by the architect and supported by the RFAC - and the substitution of non-patinating copper cladding with crudely-detailed parapet copings; the very damaging subdivision both horizontally and vertically of the once lofty, well-proportioned and impeccably-detailed main entrance-hall; the proliferation of unsightly unauthorised M +E plant on the roofs of the pools hall and lesser parts of the complex; and the introduction of unattractive sodium-source lighting in the pools hall. None of these issues are picked-up in the draft document, nor recognition expressed of the desirability for their effective remedy, except for and commendably, the potential reinstatement of the full height of the entrance hall.

20. On page 6, it is stated misleadingly that 'The Old Deer Park is much more 'built-up than the Royal Botanic Gardens to which the parkland adjoins...'. Whilst this may be true in respect of the public park to each side of the Twickenham Road (as leased by the Council from the Crown Estate) it would be an exaggeration to apply this to the Old Deer Park as a whole. The suggestion that 'The parkland is... very well vegetated, particularly around the boundaries' is a curious statement. Is it really intended to omit reference to the many fine trees in the Park? Curious too, is the complete absence from the document of any reference to Kim Wilkie Associates' highly relevant *Old Deer Park, Richmond, The Crown Estate Landscape Strategy* of September, 1999, which provides an authoritative account of the landscape history and character of the Park. This omission should be remedied.

21. Surprisingly, the authors of the document fail to include any references to Powell and Moya's listed Putney Swimming Pools and Dryburgh Hall of 1968 in Section I – *Understanding the heritage* which is a close contemporary of the pools complex in the Old Deer Park designed to meet the similar needs of the residents and others in the context of a south-west London suburb.

22. Surprisingly, too, is the absence of any reference to the significant involvement of the Royal Fine Art Commission in the design of the complex (and, in later years, the campaign to secure its preservation from demolition). Similarly, it is quite extraordinary that the highly relevant and extensive citation relating to the swimming pools complex under the *Civic Trust Awards* of 1967 is not quoted on page 13 of the draft document, nor, indeed the similarly relevant and extensive appraisal published in the 1st November, 1967 issue of the *Architects' Journal*.

23. Is the suggestion on page 14 that 'The building also incorporates large swathes of glass curtain walls, steel, concrete and copper roofing which is a very fine example of 1960's

vernacular’ really a sound reflection of the character and quality of the building? Surely, this is not ‘1960s vernacular’. Such a term is surely very much more applicable to the 1960s work of renowned local housing architects Darbourne and Darke?

24. No mention is made of the fact that the ill-conceived, unsightly and highly damaging ‘Wild Waters’ flumes facility thankfully removed in its entirety as part of the refurbishment of the pools complex in 1992-1993 was added in 1985 despite local opposition and seriously detracted from the operation and amenity of the pools complex.

25. Of considerable concern is the omission of any reference to the major, public controversy generated by the proposals for the demolition and redevelopment of the pools complex and its landscaped setting as part of a vastly over-sized and poorly designed indoor skating-rink, indoor bowling facility and swimming-pool complex with multi-level car-parking put forward by developer, London and Edinburgh Trust between 1987 and 1989; the campaign by The Richmond Society and The Friends of Old Deer Park together with the Save Richmond Pool Action Group in 1987-1989 against the proposals; and the granting of Planning Permission by the former SDP-Liberal Alliance Council administration in highly questionable circumstances in March, 1989, despite the opposition of the Royal Fine Art Commission and the local community. Similarly, no mention is made of the most fortunate aborting of the approved scheme resulting from the failure of the Council to secure the recover the sub-lease granted to the operator of the ‘Wild Waters’ flumes facility by a specific deadline as required under the legal agreement between the Council and the prospective developer, and the consequential abandonment of the scheme by the developer and the payment instead of a substantial financial sum to the Council by way of compensation – later used to support the funding of the refurbishment scheme.

26. These important aspects of the history of the pools complex and its landscaped setting are essential to a clear and full understanding of why the pools and its landscaped setting still survive today and their omission from the draft document precludes any proper assessment and understanding of the historic value, aesthetic value and communal value of the existing complex and its landscaped setting.

27. The reference on page 16 to the suggestion that ‘much of the external appearance still exhibits the original detailing needs to be qualified. See paragraph 19 above.

SECTION 2 – STATEMENT OF SIGNIFICANCE

28. I am unclear why the five-part scale of ‘significance’ with definitions given on pages 17 and 40 of the draft document – the source of which it is not stated – is different to the four-part scale of ‘significance’ and the definitions given on page 25 and 36 - which is stated as being sourced from a publication by the Prince’s Regeneration Trust of 2009. This scale, together with the four-part scale of ‘capacity for change’ and the definitions would appear to be the extract from a sample report printed on page 15 of *How to write conservation reports*,

published by The Prince's Regeneration Trust in 2009 rather than the five-levels of significance printed on page 25 of the same document.

29. It is assumed that the reference to 'neutral significance' in the 'Scale of significance' given on pages 17 and 40 of the draft document and in the levels of significance printed on page 25 of the Trust's publication, is to be construed as an absence of any special architectural or historic interest or any heritage significance.

30. It is to be regretted that the plans and sections published in published in the 1st November, 1967, issue of *The Architects' Journal* - 'Swimming baths in Old Deer Park, Richmond, Surrey' have not been used, with adjustments as necessary, as the base diagrams on pages 26 to 37. This would facilitate a clear and full understanding of the assessments given on each page.

31. Anomalously, the assessments of the comparative levels of significance of the listed complex and its respective parts are contained in Section 3 – *Capacity for change*, rather than in Section 2 – *Statement of significance*.

SECTION 3 – CAPACITY FOR CHANGE

32. As noted in paragraph 12 above and most importantly, no reference is made in either Section 1 – *Understanding the heritage* or, importantly, in this section to the fundamental requirement under Section 16 of the *Planning (Listed Buildings and Conservation Areas) Act, 1990* to the fundamental requirement for the local planning authority or the Secretary of State to 'have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses' when considering an application for Listed Building Consent – only reference is made to Section 66 of the Act relating to the fundamental requirement for the local planning authority or the Secretary of State to 'have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses' when considering an application for Planning Permission.

COMMENTS ON THE ASSESSMENTS GIVEN ON PAGES 26 TO 37

33. Asset no. 1: 'Considerable significance' agreed; 'High capacity' for internal change only agreed providing that this serves to reverse the very damaging subdivision both horizontally and vertically of the once lofty, well-proportioned and impeccably-detailed main entrance-hall. I very much welcome the suggestion that 'consideration should be given to reinstating the experience of the full height' of the space. I would suggest that the capacity for external change is 'Very low'.

34. Asset no. 2: 'Considerable significance' for the ground floor of the two-storey, former private baths, offices and flat block not agreed; I would suggest that it is of only 'Some significance'; 'High capacity for change' agreed.
35. Asset no. 3: 'Considerable significance' agreed; 'High capacity' for internal change only agreed. I would suggest that the scope for external change is 'moderate' rather than 'high'.
36. Asset no. 4: 'Exceptional significance' agreed; 'Very low capacity' for change agreed.
37. Asset no. 5: 'Exceptional significance' agreed; 'Very low capacity' for change agreed.
38. Asset no. 6: 'Exceptional significance' agreed; 'Very low capacity' for change agreed.
39. Asset no. 7 – including the boundary-walls: 'Exceptional significance' agreed; 'Moderate capacity for change' not agreed; suggest 'Very low capacity for change'.
40. Asset no. 8: 'Exceptional significance' agreed; 'Very low capacity' for change agreed.
41. Asset no. 9: 'Exceptional significance' agreed; 'Very low capacity' for change agreed.
42. Asset no. 10: 'Considerable significance' agreed, but only in respect of the upper part of the former entrance hall; I would suggest that the upper floor of the two-storey former private baths, offices and flat block is of only 'Some significance'; 'High capacity for change' only agreed in relation to the upper floor of the two-storey former private baths and offices and flat block, and for internal change in respect of the upper part of the former entrance hall providing that this serves to reverse the very damaging subdivision both horizontally and vertically of the once lofty, well-proportioned and impeccably-detailed main entrance-hall. I very welcome the suggestion that 'consideration should be given to reinstating the experience of the full height' of the space. I would suggest that the capacity for external change of the former entrance hall element is 'Very low'.
43. Entirely missing from the series of 'assets' and the assessments of their comparative significance and capacity for change are the Sports changing room and the hard-paved landscape and car-park to the immediate north-west of the pools complex which clearly form part of the curtilage of the listed asset, be they of lesser special interest and significance of the overall site.
44. Overall significance and overall capacity for change (not 'to change'): Amazingly, missing from these assessments are the landscaped setting to the pools complex, including the integral boundary-walls and the sports changing room and the hard-paved landscape and car-park to the immediate north-west of the pools complex which clearly form part of the curtilage of the listed asset.
45. From what is shown in the diagrams (see paragraph 42 above) I agree with the assessment of the relative significance of the areas identified as of 'Exceptional and considerable significance', except for the inclusion of both the upper and lower floors of the

two-storey, former private baths, offices and flat block not agreed; I would suggest that the block is of only 'Some significance'; 'High capacity for change' agreed.

46. From what is shown in the diagrams (see paragraph 42 above) I agree with the assessment of the comparative capacity for change (not 'to change') of the areas identified as offering 'Very low capacity' but would question the identification of the single-storey 'changing rooms and studio areas and the 'foyer' (both levels) as offering 'High capacity' for change. I would suggest these areas should be identified as offering 'Moderate capacity for change'. However, as reflected in my comments above, I fully agree with the identification of the two-storey 'gym and health suite' block as offering 'High capacity for change'.

47. In relation to the bibliography and list of references, I note the absence of the following:

- The 1st November, 1967, issue of *The Architects' Journal* - 'Swimming baths in Old Deer Park, Richmond, Surrey';
- The highly relevant and extensive citation relating to the swimming pools complex under the Civic Trust Awards of 1967;
- The correspondence between English Heritage and the Friends of Old Deer Park, The Twentieth Century Society and the Civic Trust relating to requests for the listing of the pools complex - Historic England's Designation Team should retain copies, and the relevant reports of English Heritage's Listing Team;
- The entry and accompanying description in the *National Heritage List for England* relating to the inclusion of the Old Deer Park as an extension to the grade I registered Royal Botanic Gardens, Kew Historic Park of 1987/January, 1994
- *Listing of Richmond Baths – Pools-on-the-Park – Appendix I: Evidence for widespread public support – Compiled by The Friends of Old Deer Park*, January, 1995 – Historic England's Designation Team should retain a copy;
- 'Richmond Baths' extension threatened by listing', *The Architects' Journal*, 7th September, 1995; and
- *Old Deer Park, Richmond, The Crown Estate Landscape Strategy* Kim Wilkie Associates, September, 1999 – the Council should have one or more copies.

CONCLUSION

48. In relation to the structure and format of the draft document, I would suggest that in order to assist in easy and ready use by stakeholders, the public and others and the

effective application of the guidance it contains, the ordering of the sections and sub-sections should be reviewed and amended and the paragraphs numbered.

49. Finally, I would very willing to sit down with you and the authors of the document to run through and clarify my comments insofar as this may be helpful, and to share copies any documentation from my files on the Old Deer Park and the Pools-on-the Park complex and its landscaped setting in particular which the authors may not have located from other sources.

Kind regards,

Paul

PAUL VELLUET, M.Litt., RIBA, IHBC, CHARTERED ARCHITECT



LONDON BOROUGH OF RICHMOND-UPON-THAMES LOCAL PLAN

A STATEMENT BY CHARTERED ARCHITECT AND BOROUGH RESIDENT, PAUL VELLUET, REGARDING SITE-SPECIFIC PROPOSAL SA 19 – RICHMOND STATION, RICHMOND, FOR PRESENTATION AT THE RELEVANT HEARING SESSION OF THE INSPECTOR'S EXAMINATION, SEPTEMBER, 2017

I. INTRODUCTION

- I.1 I am submitting this statement in an entirely independent capacity as a locally-based architect, as resident of the Borough since 1948 and as regular user of Richmond Station since September, 1962. I am a former Chairman of The Richmond Society and have recently been appointed as President of the Richmond Local History Society. I am a member of the RIBA's Awards Group and a former member of the RIBA's Planning Group. From 1991 until 2004, I worked as Regional Architect and Assistant Regional Director of English Heritage, London. In past years I have served on the Executive Committee of the Richmond Society and on the Richmond-upon-Thames Council's Conservation Areas Advisory Committee. I attach fuller particulars of my qualifications and experience in Appendix A.
- I.2 In this statement I convey my serious concern regarding the soundness of specific aspects of the Council's final (published) version of the *Richmond-upon-Thames Local Plan* relating to Richmond Station and its future – Site specific Proposal SA 19. My statement focuses on those aspects of the Council's *Plan* which I consider to be insufficiently robust in providing the Council, as local planning authority and the local community with effective control over development affecting the particular architectural, historic interest and significance of Richmond Station as 'a non-designated heritage asset', and the character, appearance and significance of the Central Richmond Conservation Area as 'a designated heritage asset' (in the terms commended in the relevant parts of the *National Planning Policy Framework*). My statement takes account of the formal advice on 'soundness' as explained in paragraph 182 of the *National Planning Policy Framework*.
- I.3 In Section 3 of this Statement, I set out my concerns about the soundness of specific aspects of the *Plan* relating Site-specific Proposal SA 19 - Richmond Station, Richmond. I explain the reasons for my concerns, and put forward my suggestion as to the potential means of addressing the weaknesses of the *Plan* as presently submitted and securing amendment which will contribute to providing a sounder definition of the Proposal insofar as is necessary to ensure that the particular interest and significance of Richmond Station as a non-designated heritage asset and the character, appearance and significance of the Central Richmond Conservation Area as a designated heritage asset will be assured. In setting forward these concerns, I would stress that I see no

objections to the incorporation of wording in the proposal statement referring to the provision of improved public transport interchange facilities on the site or to the potential redevelopment of the various post-war buildings to the immediate north and south of the original station-complex subject to the satisfactory scale and design.

2. THE BACKGROUND TO MY STATEMENT

- 2.1 This statement follows my representations in response to the Council's consultation on the final (publication) version of the *London Borough of Richmond-upon-Thames Local Plan* in relation to Site-specific Proposal SA 19 – Richmond Station, Richmond, submitted to the Council in February, 2017 – see copy attached as Appendix B. This, in turn, followed my formal response to the Council's consultation on *The First Draft of the London Borough of Richmond-upon-Thames Local Plan (Pre-publication version)* in relation to Site-specific Proposal SA 18, submitted to the Council in August, 2016 – see copy attached as Appendix C. A summary of this response was set out, with added comments by Council officers, in the Council's *Summaries of responses received in relation to the Local Plan policies and site allocations and Council's response*, reference 437.
- 2.2 The original frontage building of Richmond Station facing Kew Road containing the generously proportioned, upper concourse together with the circulation areas, platform-buildings and platform-canopies comprise a well-designed and coherent complex of sufficient special architectural and historic interest to merit statutory listing. Completed in 1937 the station complex was designed for the Southern Railway by the company's Architects Department under the direction of James Robb Scott (1882-1965) and connects sensitively to the surviving and very fine, 19th century platform-canopies serving island-platforms 4 and 5 and 6 and 7. The same architectural team designed the almost contemporary, grade II* listed Surbiton Station. Although parts of the station, in particular, the upper concourse, have lost some of their original features and detailing, sufficient original fabric and features remain to make full reinstatement entirely feasible. This would enable the original architectural integrity of the building to be recovered to leave the station in a similar condition as the fully restored listed station at Surbiton.
- 2.3 Having used the Station almost continuously since the early-1960s, together with many other Borough residents and visitors to Richmond, I value the distinctive architectural character and significance of the complex, its efficient layout, and above all, the platforms being day-lit and open to the sky and naturally ventilated.
- 2.4 Any new development spanning across and above some or all of the existing tracks and platforms of the station would not only seriously damage the architectural integrity of the existing station complex but would destroy the amenity presently

enjoyed by the travelling public. In addition and importantly, having been directly and professionally involved at the planning stages of the major development proposals above Victoria Station and Charing Cross Station, approved and implemented during the 1980s; in the development proposals above Fulham Broadway Station, approved and implemented in the 1990s; in the thankfully aborted development proposals above Paddington Station put forward in the 1990s; and, most recently, in the development proposals above the eastern Farringdon Cross-Rail/London Underground Interchange Station on Smithfield, now being implemented, I am entirely familiar with the issues raised by proposals for development above railway stations and of the impact of such developments when approved and implemented. I am also entirely familiar with the operational, logistical and cost challenges involved in seeking to develop above railway running-tracks and platforms, and of the potential need to provide significant commercial and other floor-space in such development in order to justify the additional costs incurred and to achieve a viable and profitable development for the prospective developer and the railway freeholder. Accordingly, in the light of such extensive and diverse experience, I view with particular concern the potentially damaging impact of seeking to span across the running-tracks and platforms at Richmond Station with substantially scaled development, as well as the other implications of redeveloping the station site.

- 2.5 I note that Richmond Station was rightly recommended for statutory listing by the Richmond Society in May, 1976, December, 1988, April, 1989 and 1998. (A copy of three pages of the 40-page report prepared by the Society in 1998 is attached as Appendix D). I am not aware that the case for listing has been addressed by English Heritage or Historic England since then, despite the significant changes to listing criteria since that time. Ironically, had the station complex been listed at this time, then many of the features and details that have been lost or adversely altered in the years since under the terms of 'permitted development' would have survived.
- 2.6 I also note that in July, 1997, English Heritage wrote to the architects for a potential redevelopment scheme for the entire station complex and adjoining sites further to a 'Planning Weekend' public consultation exercise recalling that two of the key principles which enjoyed overall support from those attending were the retention of the existing station frontage building and its effective integration into any new development; and the maintenance of full daylighting down to platform-level across all platforms, possibly within a fully glazed enclosure.
- 2.7 In my response to consultation on the *Draft Local Plan* in August, 2016, I suggested that the site specific proposal needed to be fundamentally reviewed and redrafted to provide for the retention and restoration of the entire Southern Railway station complex as completed in 1937 together with the surviving 19th century platform-canopies serving platforms 4 to 7, and the retention of the daylighting and natural ventilation of all the platforms. I note that in a submission to the Council by The

Twentieth Century Society, the group expressed great concern that the *Draft Local Plan* promoted the Station site for ‘comprehensive redevelopment’, stating that ‘given the architectural and historic importance of the building, as well as its clear townscape value within a conservation area... the draft as it stands runs counter to the guidance of the *NPPF* and to the guidance set out in the *Central Richmond Conservation Area Statement*, which specifically identifies development pressure as a problem, and which promotes the preservation, enhancement and reinstatement of architectural quality’, and urged that site-specific proposal SA 18 should be redrafted ‘in a way which encourages only conservation-led development which explicitly safeguards the retention and restoration of the 1937 station building’.

3. MY PARTICULAR CONCERNS

- 3.1 Whilst the addition of references to the location of the Station within a conservation area and to its designation as a *Building of Townscape Merit* in the relevant section of the Council’s final (publication) version of the *Local Plan* is to be welcomed, no justification whatsoever is provided for the Council’s assertion that ‘the Station is a key development site’ and that ‘there is a need for comprehensive redevelopment’ in order to deliver transport interchange improvement.
- 3.2 Importantly, the Council has failed to provide any assessment of the potential impact on the retail and business health of the remainder of the Town, on the amenity of its residents and visitors, and on the viability of existing cinemas in the Town that would result from providing ‘approximately 10 000 square metres of retail floor-space’, ‘substantial provision of employment floor-space, particularly BI offices’, ‘other uses, such as for community, leisure and entertainment’ and ‘housing in (sic) upper floors’. Similarly, the Council has failed to provide any assessment of the potentially damaging impact on the character and appearance of the conservation area and on traffic movement and car-parking in the Town that would result from the essential servicing requirements of such a vast multi-use development. Such omissions render the proposal as presently worded entirely unsound and unsustainable and in fundamental conflict with other policies of the Local Plan.
- 3.3 The statement that ‘any redevelopment (sic) proposal must be of the highest quality in character and respond positively to the Conservation Area’ is entirely inadequate in setting the necessary parameters for development of the site’ given the failure to refer to the need to provide for the retention and restoration of the entire Southern Railway station complex as completed in 1937 together with the surviving 19th century platform-canopies serving platforms 4 to 7, and the retention of the daylighting and natural ventilation of all the platforms, and the need to ensure that any new development should either preserve or enhance the character and appearance of the conservation area and sustain its significance.

- 3.4 Finally and importantly, as presently drafted, there is a failure to distinguish between the purpose-built railway station, which is clearly of particular architectural, historic and townscape significance and contributes to the particular character, appearance and significance of the Central Richmond Conservation Area, and the later, post-War, commercial buildings fronting The Quadrant and the Kew Road to each side of the main Station frontage (Westminster House and the shops below to the immediate north and Gateway House and the adjacent shops to the immediate south) and the multi-storey car-park on the southern side of the station complex, accessed from Drummond's Place, none of which possess any such significance and none of which contribute to the character, appearance or significance of the conservation area.
- 3.5 As presently drafted, the proposal reflects an alarming lack of recognition and understanding by the Council of the particular challenges and implications of designing, funding and delivering new development above railway running-tracks and platforms, and of the distinctive architectural and townscape interest and significance of the existing station-complex.
- 3.6 In the interests of clarity and consistency with the conservation and other relevant policies contained in the *National Planning Policy Framework*, the *London Plan*, and the emerging *Local Plan* and the need for a sound and sustainable statement of planning and conservation policy, I urge the Inspector to require the Council to fundamentally review and re-draft the existing the site-specific proposal, to take account of the key issues referred to above.

4. ADDITIONAL NOTE

- 4.1 I remain entirely willing to provide copies to the Inspector of any details about the history and development of the station and to clarify any of the issues I have raised in this submission. In addition, I would wish to encourage the Inspector to undertake a site inspection of the Station and its immediate setting in order to appreciate its considerable architectural and historic interest and significance as anon-designated heritage asset, and to recognise the need to ensure that sound policies are in place to ensure that such interest and significance will be effectively sustained in accordance with the relevant policies of the *National Planning Policy Framework*.
- 4.2 Finally, I would confirm that I recognise that the station was the subject of a Planning Brief drafted and adopted by the Council in March, 2002 and Site Specific Proposal R 6 in earlier local plans. However, I would observe that these contained significant and fundamental deficiencies similar to those contained in the emerging Local Plan.

Paul Velluet

7th September, 2017.

APPENDIX A – PAUL VELLUET, QUALIFICATIONS AND EXPERIENCE

Paul Velluet is a chartered architect - a member of both the RIBA and the Institute of Historic Building Conservation - with experience drawn from over thirty-five years working in both private practice and the public sector specialising in building conservation and development in historic areas. He holds B.A. Honours, B. Arch. Honours and Master of Letters degrees from the University of Newcastle-upon-Tyne.

Since 2005, he has headed an independent consultancy specialising in the provision of professional and technical advice to property owners, prospective developers and other planning and building professionals on projects involving new development in historic areas and the conservation, alteration and extension of historic buildings, particularly at the critical pre-planning and planning stages. The consultancy undertakes work for commercial, educational, residential, cultural, diplomatic, church, health-sector, hospitality-sector, urban and rural-estate and local planning authority clients, including the City of London Corporation and the City of Westminster Council. Clients have also included historic building trusts and local amenity and community groups in addition to the historic London estates.

Paul Velluet's professional experience includes working as a project architect with architects Manning Clamp + Partners, Richmond, Surrey, 1972-1975; as a Principal Urban and Design and Conservation Officer in Westminster City Council's Department of Planning and Transportation, 1976-1991; as Regional Architect and Assistant Regional Director, English Heritage London Region, 1991-2004; and as Senior Associate, Conservation and Planning, with the major Central London commercial practice HOK Architects, 2005-2011. During these years, he has been professionally responsible for projects which have been recognised with a *European Architectural Heritage Year (Civic Trust) Award*, a *Commendation under the R.I.B.A. Awards*, and awards and commendations under local awards schemes in south-west London. He has also been an exhibitor in the Architecture Room of the Royal Academy of Arts Annual Summer Exhibitions.

Currently he serves as a member of the RIBA's Awards Group; a member of the Archdiocese of Westminster Historic Churches Committee; and a member of the Guildford Cathedral Fabric Advisory Committee. In past years he has served on the Executive Committee of the Society of Architectural Historians of Great Britain, the RIBA's Planning Group, the Royal Fine Art Commission's Thames Landscape Strategy Panel, the Cathedrals Fabric Commission for England, the Cathedrals Fabric Commission's Technical Group, and the Richmond Society's Executive Committee. For twenty years he served as a Trustee of the Covent Garden Area Trust, and for five years as an assessor for the RIBA/Crown Estate's Annual Conservation Awards.

He has been a contributor to various publications, journals and guidance including: *Context: New buildings in historic settings* (The Architectural Press, 1998); *The Buildings of England, London 2: South* (1983), and *The Buildings of London, London 6: Westminster* (2003); *The Architects' Journal*, *Planning in London*, *Urban Design Quarterly*, *English Heritage's Conservation Bulletin*, *Church Building* and *Ecclesiology Today*; and diverse policy and guidance documents for Westminster City Council and English Heritage.

APPENDIX B

CONSULTATION ON THE FINAL VERSION OF THE LONDON BOROUGH OF RICHMOND-UPON-THAMES LOCAL PLAN (PUBLICATION)

REPRESENTATION BY PAUL VELLUET, CHARTERED ARCHITECT, IN RELATION TO SITE-SPECIFIC PROPOSAL SA 19 - RICHMOND STATION, RICHMOND

FEBRUARY, 2017

This representation follows my formal response to consultation on *The First Draft of the London Borough of Richmond-upon-Thames Local Plan (Pre-publication version)* in relation to Site-specific proposal SA 19 – Richmond Station, Richmond, submitted in August, 2016. A summary of my response is set out in the Council's *Summaries of responses received in relation to the Local Plan policies and site allocations and Council's response*, reference 437.

This representation takes account of the formal advice on 'soundness' as explained in paragraph 182 of the *National Planning Policy Framework*.

In my response to consultation on the *Draft Local Plan* last August, I stated:

'The original frontage building of the Station facing Kew Road containing the generously proportioned upper concourse together with the circulation areas, platform-buildings and platform-canopies comprise a well-designed and coherent complex of sufficient special architectural and historic interest to merit statutory listing. Completed in 1937 the station complex was designed for the Southern Railway by the company's Architects Department under the direction of James Robb Scott (1882-1965) and connects sensitively to the surviving and very fine, 19th century platform-canopies serving island-platforms 4 and 5 and 6 and 7. The same architectural team designed the almost contemporary, grade II* listed Surbiton Station.

Having used the Station almost continuously since the early-1960s, together with many other Borough residents and visitors to Richmond, I value the distinctive architectural character and significance of the complex, its efficient layout, and above all, the platforms being day-lit and open to the sky and naturally ventilated. Any development taken across and above some or all of the existing tracks and platforms would not only seriously damage the architectural integrity of the existing station complex but would destroy the amenity presently enjoyed by the travelling public. Accordingly, the proposal as presently envisaged under SA 18 is not only totally unacceptable, but runs against the relevant policies contained in the *National Planning Policy Framework* and the Council's existing and emerging conservation and other policies.

I should add the Station was rightly recommended for statutory listing by The Richmond Society in May, 1976 and again in December, 1988 and April, 1989. I am not aware that the case for listing has been addressed by English Heritage or Historic England since then. In July, 1997, English Heritage wrote to the architects for a potential redevelopment scheme for the entire station complex and adjoining sites in further to a 'Planning Weekend' public

consultation exercise recalling that two of the key principles which enjoyed overall support from those attending were the retention of the existing station frontage building and its effective integration into new development; and the maintenance of full daylighting down to platform-level across all platforms, possibly within a fully glazed enclosure.

In my response to consultation on the *Draft Local Plan* last August, I suggested that the project needed to be fundamentally reviewed and redrafted to provide for the retention and restoration of the entire Southern Railway station complex as completed in 1937 together with the surviving 19th century platform-canopies serving platforms 4 to 7, and the retention of the daylighting and natural ventilation of all the platforms. I note that in a submission to the Council by The Twentieth Century Society, it expressed great concern that the *Draft Local Plan* promoted the Station site for 'comprehensive redevelopment', stating that 'given the architectural and historic importance of the building, as well as its clear townscape value within a conservation area... the draft as it stands runs counter to the guidance of the *NPPF* and to the guidance set out in the *Central Richmond Conservation Area Statement*, which specifically identifies development pressure as a problem, and which promotes the preservation, enhancement and reinstatement of architectural quality', and urged at site-specific proposal SA 18 should be redrafted 'in a way which encourages only conservation-led development which explicitly safeguards the retention and restoration of the 1937 station building'.

Whilst the addition of references to the location of the Station within a conservation area and to its designation as a *Building of Townscape Merit* is to be welcomed, no justification whatsoever is provided for the Council's assertion that 'the Station is a key development site' and that 'there is a need for comprehensive redevelopment' in order to deliver transport interchange improvement. The Council has not provided any assessment of the potential impact on the retail and business health of the remainder of the Town, on the amenity of its residents and visitors, and on the viability of existing cinemas in the Town that would result from providing 'approximately 10 000 square metres of retail floor-space', 'substantial provision of employment floor-space, particularly BI offices', 'other uses, such as for community, leisure and entertainment' and 'housing in (sic) upper floors'. Similarly, the Council has not provided any assessment of the potentially damaging impact on the character and appearance of the conservation area and on traffic movement and car-parking in the Town that would result from the essential servicing requirements of such a vast multi-use development. Such omissions render the proposal as presently worded entirely unsound and unsustainable.

The statement that 'any redevelopment (sic) proposal must be of the highest quality in character and respond positively to the Conservation Area' is entirely inadequate in setting the necessary parameters for development of the site' given the failure to refer to the need to provide for the retention and restoration of the entire Southern Railway station complex as completed in 1937 together with the surviving 19th century platform-canopies serving platforms 4 to 7, and the retention of the daylighting and natural ventilation of all the

platforms, and the need to ensure that any new development should either preserve or enhance the character and appearance of the conservation area and sustain its significance.

Finally and importantly, as presently drafted, there is a failure to distinguish between the purpose-built railway station, which is clearly of particular architectural, historic and townscape significance, and the later, post-War commercial buildings fronting The Quadrant and the Kew Road to each side of the main Station frontage and the multi-storey car-park on the southern side of the station complex which possess no such significance.

In the interests of clarity and consistency with the conservation and other relevant policies in the *National Planning Policy Framework*, the *London Plan*, and the emerging *Local Plan* and the need for a sound and sustainable statement of planning and conservation policy, the existing the site-specific proposal needs to be fundamentally reviewed and redrafted.

Paul Velluet

15th February, 2017.

PAUL VELLUET, M.Litt., RIBA, IHBC, CHARTERED ARCHITECT



APPENDIX C

LONDON BOROUGH OF RICHMOND-UPON-THAMES DRAFT LOCAL PLAN: PRE-PUBLICATION VERSION FOR CONSULTATION

A RESPONSE FROM PAUL VELLUET, CHARTERED ARCHITECT AND RESIDENT OF ST MARGARET'S

SITE ALLOCATIONS – SA 18 RICHMOND STATION, RICHMOND

AUGUST, 2016

I write as a locally-based architect, a resident of the Borough since 1948 and as a former Chairman of The Richmond Society. I am a member of the RIBA's Awards Group, a former Assistant Director of English Heritage London Region and a former member of the Richmond-upon-Thames Council's Conservation Areas Advisory Committee.

I wish to raise fundamental objections to proposal SA 18 as presently drafted.

The original frontage building of the Station facing Kew Road containing the generously proportioned upper concourse together with the circulation areas, platform-buildings and platform-canopies comprise a well-designed and coherent complex of sufficient special architectural and historic interest to merit statutory listing. Completed in 1937 the station complex was designed for the Southern Railway by the company's Architects Department under the direction of James Robb Scott (1882-1965) and connects sensitively to the surviving and very fine, 19th century platform-canopies serving island-platforms 4 and 5 and 6 and 7. The same architectural team designed the almost contemporary, grade II* listed Surbiton Station.

Having used the Station almost continuously since the early-1960s, together with many other Borough residents and visitors to Richmond, I value the distinctive architectural character and significance of the complex, its efficient layout, and above all, the platforms being day-lit and open to the sky and naturally ventilated. Any development taken across and above some or all of the existing tracks and platforms would not only seriously damage the architectural integrity of the existing station complex but would destroy the amenity presently enjoyed by the travelling public. Accordingly, the proposal as presently envisaged under SA 18 is not only totally unacceptable, but runs against the relevant policies contained in the *National Planning Policy Framework* and the Council's existing and emerging conservation and other policies.

The project needs to be fundamentally reviewed and redrafted to provide for the retention and restoration of the entire Southern Railway station complex as completed in 1937 together with the surviving 19th century platform-canopies serving platforms 4 to 7, and the retention of the daylighting and natural ventilation of all the platforms.

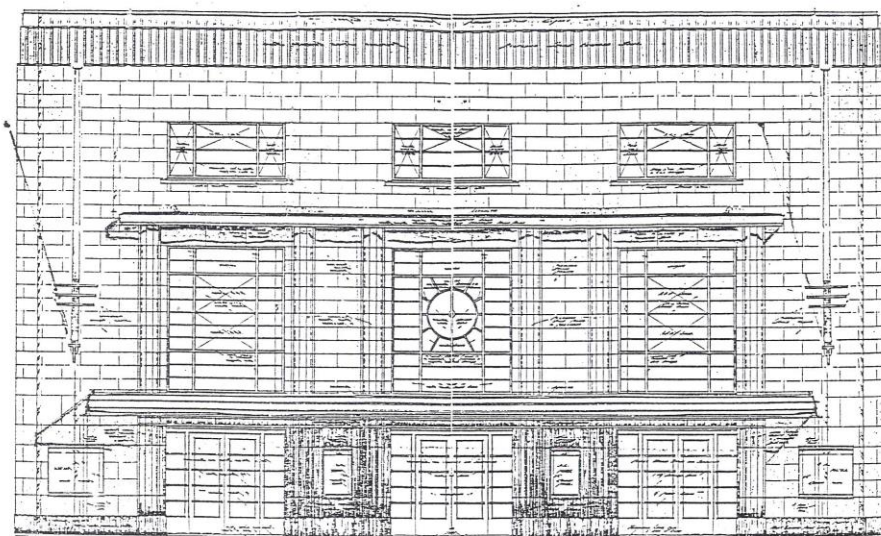
Paul Velluet, M.Litt., RIBA, IHBC, Chartered Architect



APPENDIX D – PAGES FROM THE RICHMOND SOCIETY'S 1998 REPORT

Rec.
21.V.01

RICHMOND STATION
Southern Railways 1937



Extract from working drawing for Richmond Station

An Illustrated Architectural and Historical View of the station
prepared in 1998 by



THE RICHMOND SOCIETY

The objectives of this report are:

To provide a brief history of the station and to illustrate the details of architectural interest in the building.

The report compares the station with other railway examples designed and constructed between the wars (1918 - 1939)

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The report is illustrated with photographs and key drawings as follows;

Extract from the Ordnance Survey map dated 1933
Plan of Station dated 1936
Elevations and Sections extracted from the original drawings
Notes and Photographs from The Builder and
The National Railway Museum Archive.

Introduction to the Report

This report has been prepared by the Richmond Society as a factual historical and architectural appraisal of Richmond Station. It has been made as comprehensive as possible by reference both to direct archival material and to the wider context of other contemporary examples which influenced its design.

The instigation of this study has been prompted by the scheme proposals from Railtrack PLC and their first appointed partnership developer to redevelop the whole of the Station's five hectare site. The nub of Railtrack's initial invitation brief to developers was that an improved station environment and integrated transport interchange were to be supported by a major commercial, retail and office development.

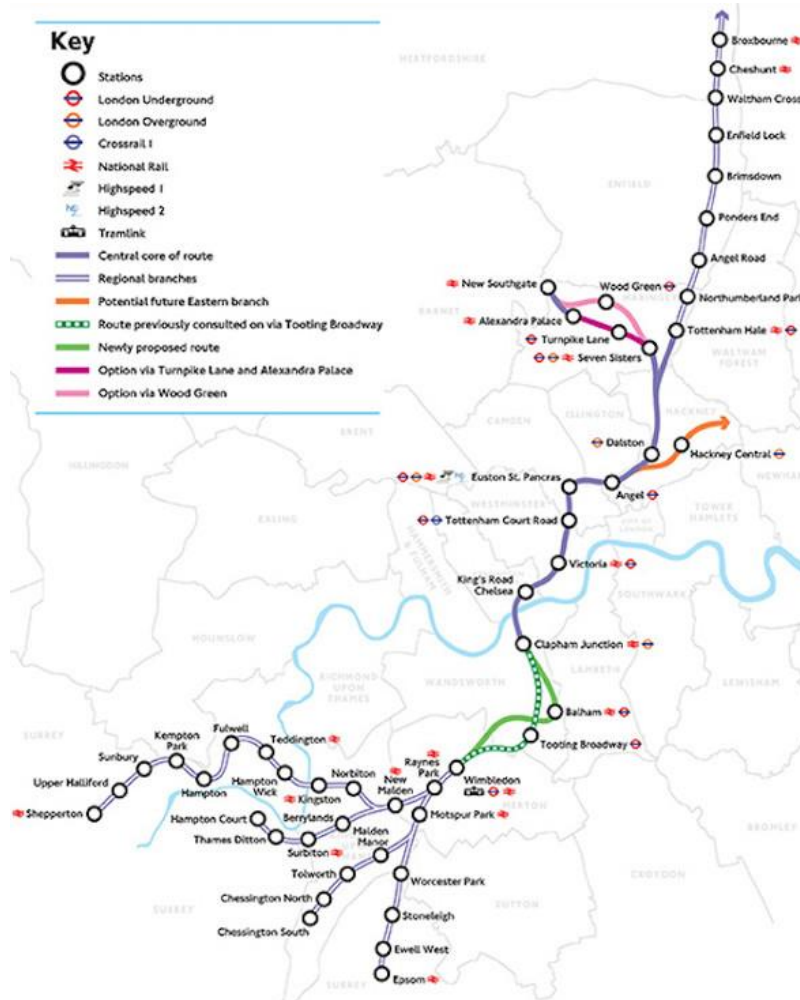
As regards the existing station buildings, it appears from the outset that their retention was not envisaged. The brief from Railtrack stated that the provision of a new station concourse including station retail, ticket and travel office would be a "likely" element of the targeted major development scheme.

The plan subsequently prepared by the Trevor Osborne Group indeed adopted a "clean sweep" approach. Any suggestions that (e.g.) the Booking Hall entrance building might be considered for incorporation in a redevelopment were flatly turned down.

The Richmond Society believes evaluation of the existing buildings to be an essential factor in any consideration of plans for the Station site and that this has not been done. The purpose of this report is to remedy this omission and provide to all concerned with the context of present or future schemes for the site, a factual account of the historical and architectural development of the station buildings. An appreciation of the worth and significance of the station is, we believe, essential to recommendations for its future.

Respondent 30 - Jon Rowles on behalf of OBO Friends of Heathfield Recreation Ground and Environs

In relation to Question 11 - In addition to our existing approaches of directing larger scale development to the borough's town centres, and expecting the majority of development on brownfield sites, where should we direct new growth in the borough?



In relation to Question 17 Can you suggest any other ways we could accommodate future growth and new development, ensuring support for sustainable communities?



Result of lack of bin storage for new flats; squalor.
Location: Bridge Way entrance to service road to Whitton High Street

In relation to Q 28 - What other ways could help deliver more affordable housing, in the right locations, given land values and property prices in the borough, and recognise the wider community benefits it brings?



Red Box shows where empty loft space could be converted into new units. This example is Andover Road in Twickenham.

In relation to Question 77 - Do you have any other suggestions on how planning can promote or contribute to creating places and an environment that is conducive to weight loss and active lifestyles?



Arden Close in Whitton – and example of lack of pavements discouraging exercise