



**All responses received to the Pre-Publication Draft Local Plan (Regulation 18)**  
[https://www.richmond.gov.uk/services/planning/planning\\_policy/local\\_plan/draft\\_local\\_plan/draft\\_local\\_plan\\_pre\\_publication\\_version](https://www.richmond.gov.uk/services/planning/planning_policy/local_plan/draft_local_plan/draft_local_plan_pre_publication_version)  
**Consultation from 10 December 2021 until 31 January 2022**

**Published by LBRuT May 2022**

**Appendices:**

1. Hannah Gray, Avison Young on behalf of National Grid
2. David Wilson, Thames Water
3. Vincent Gabbe, Knight Frank, on behalf of Harlequin Football Club Limited
4. Emma Penson, DWD on behalf of Dukes Education Group and Radnor House School Limited
5. Marie Lewis
6. Nick Alston, Avison Young on behalf of St George Plc and Marks & Spencer
7. George Goodby, Environment Agency
8. Ben Fox, Planware LTD on behalf of McDonald’s Restaurants LTD
9. Faye Wright, Forward Planning and Development on behalf of BMO Real Estate
10. James Sheppard, CBRE, on behalf of LGC Ltd
11. David Taylor
12. Hannah Blunstone, CBRE on behalf of Rugby Football Union (RFU)

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](http://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.

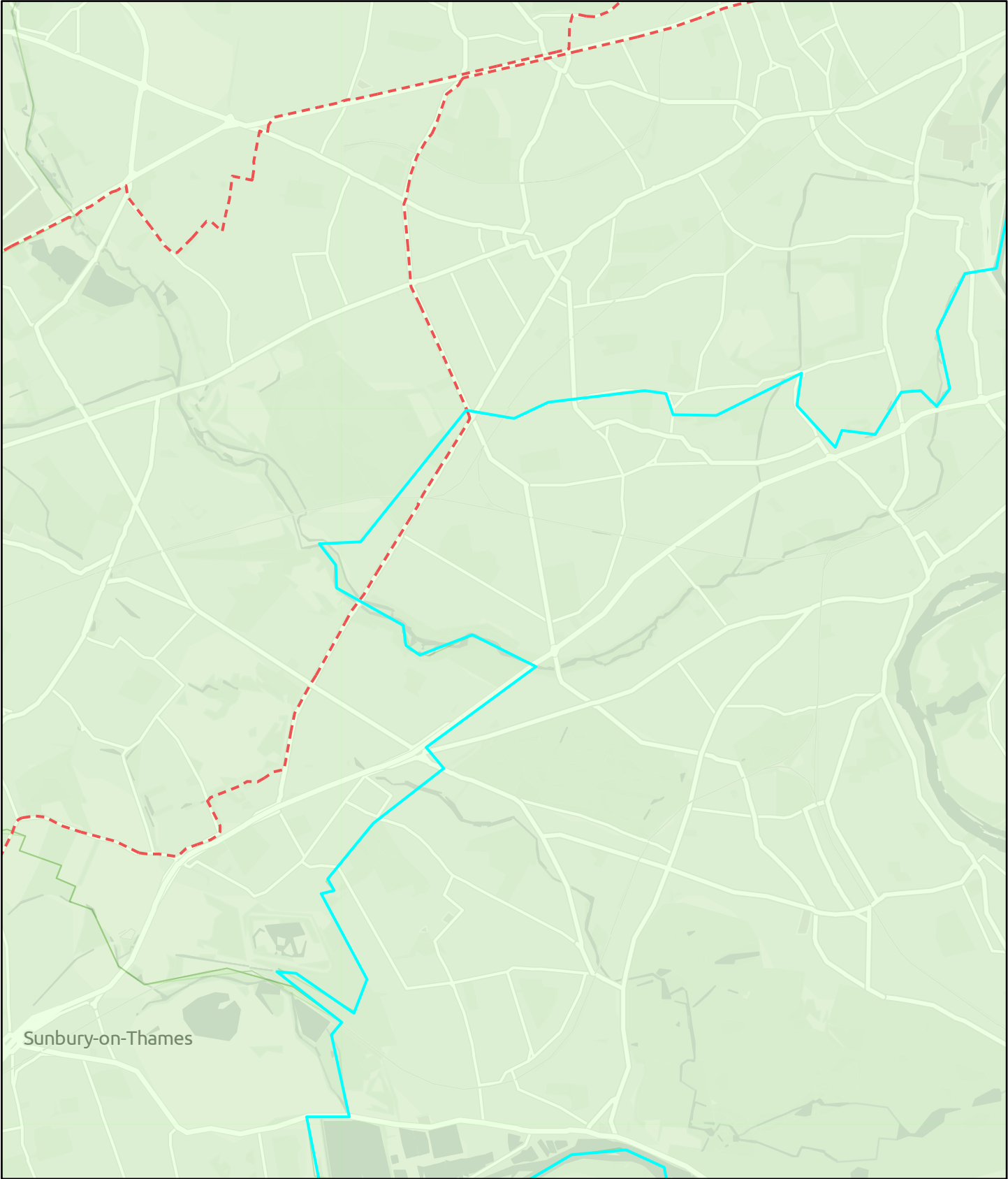
National Grid's '*Guidelines when working near National Grid Gas assets*' can be downloaded here: [www.nationalgridgas.com/land-and-assets/working-near-our-assets](http://www.nationalgridgas.com/land-and-assets/working-near-our-assets)

#### 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 visit the website: <https://lsbud.co.uk/>

For local planning policy queries, please contact: [nationalgrid.uk@avisonyoung.com](mailto:nationalgrid.uk@avisonyoung.com)

# Local Plan Pre-Publication Consultation



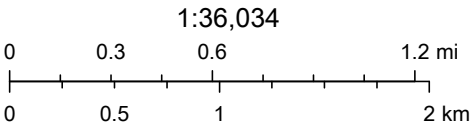
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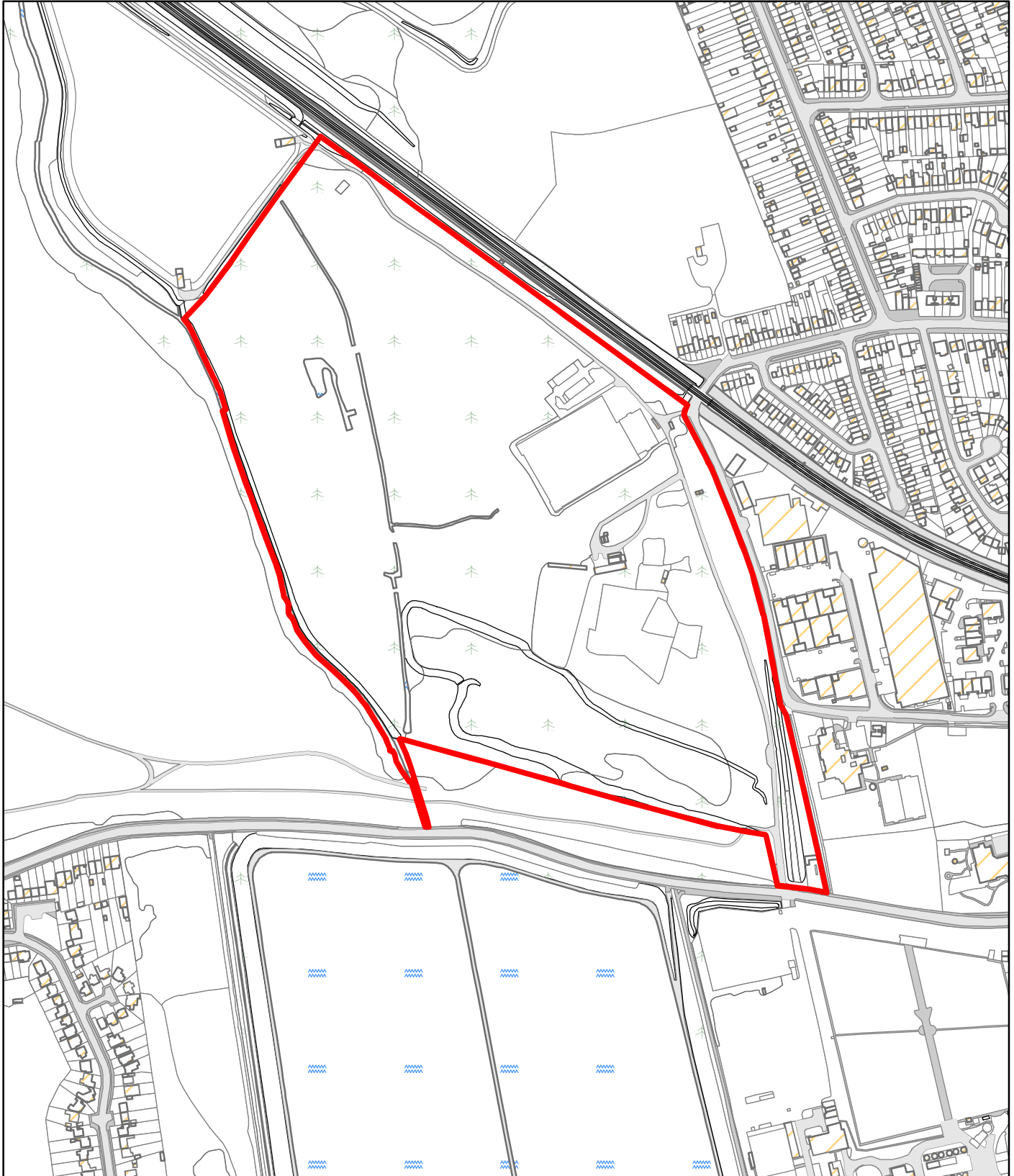
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Development\_Plan\_Monitoring\_v2\_977



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# Hydes Field, Upper Sunbury Road - Site Location Plan



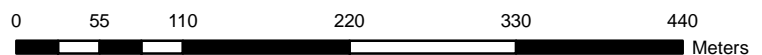
**Thames Water**  
Map



Printed By : twalsh  
Print Date : 25/01/2022  
Map Centre On : 512346, 169940  
Centre Tile No. : TQ1269NW

## Comments:

Please enter comments here:



Current Scale : 1:5,000

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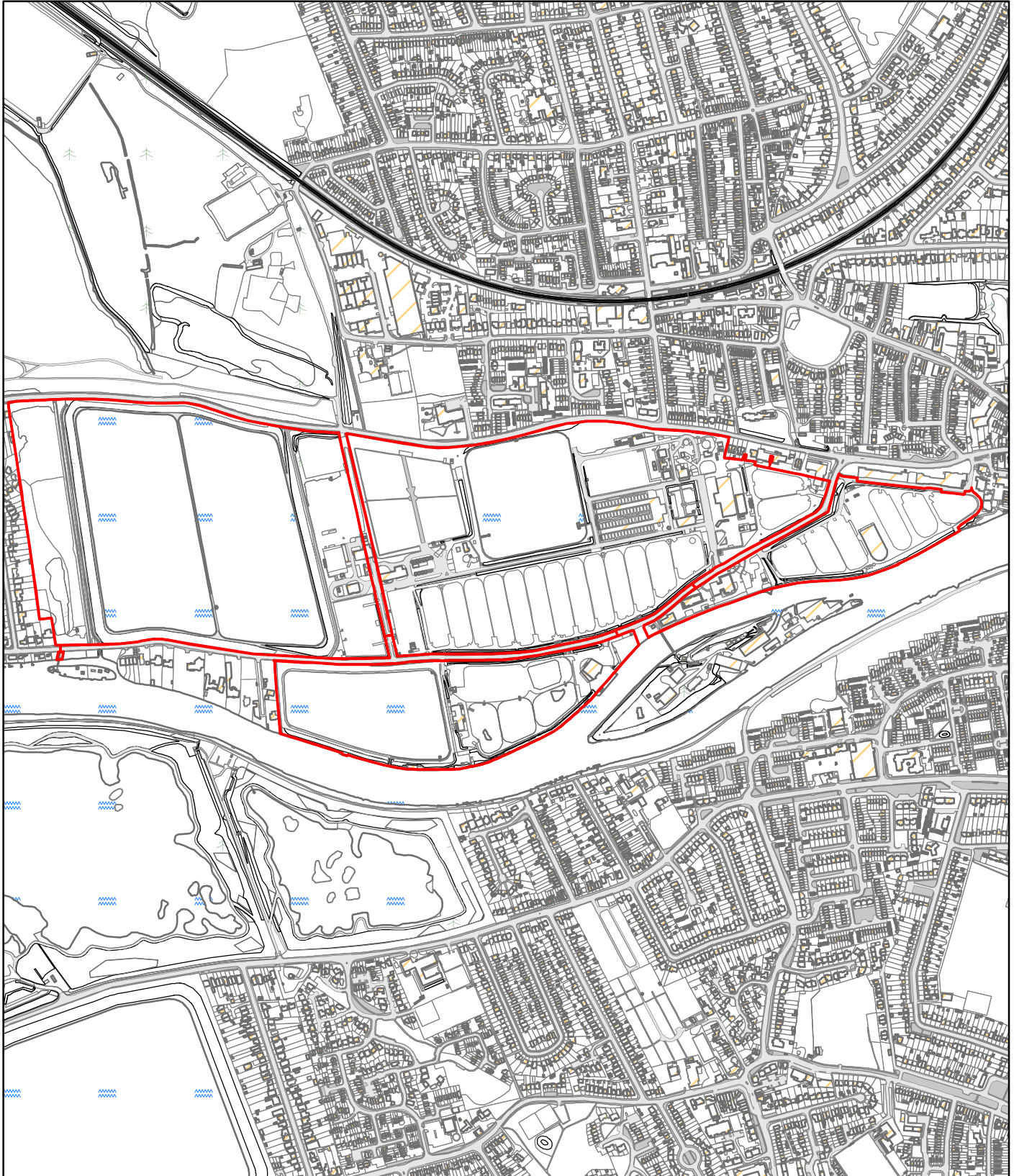
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# HAMPTON WTW LOCATION PLAN



**Thames Water**  
**Map**



Printed By : twalsh  
Print Date : 25/01/2022  
Map Centre On : 512896, 169255  
Centre Tile No. : TQ1269SE

## Comments:

Please enter comments here:

0 110 220 440 660 880 Meters

Current Scale : 1:10,000

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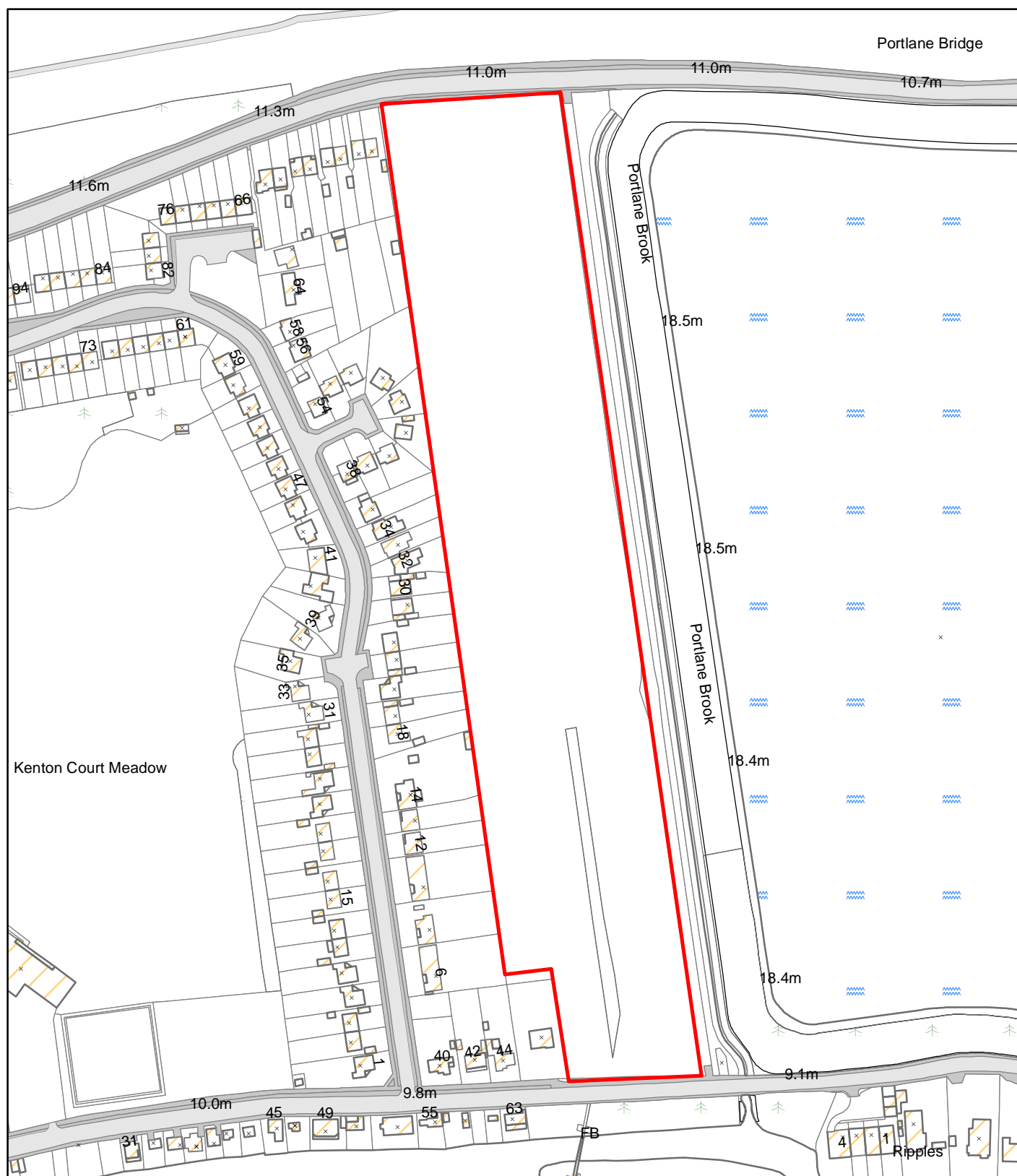
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# Land west of Stain Hill Reservoirs, Lower Sunbury Road - Site Location Plan



**Thames Water**  
Map



Printed By : CCOLLOFF  
Print Date : 28/01/2013  
Map Tile Name: 58480

0 15 30 60 90 120  
Meters  
Current Scale : 1:2,500

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# **LONDON BOROUGH OF RICHMOND UPON THAMES**

## **LOCAL PLAN DIRECTION OF TRAVEL CONSULTATION**

### **Contents**

1. Introduction
2. Site Description
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7. Next Steps

### **1. Introduction**

- 1.1 The recently published London Borough of Richmond Upon Thames Local Plan Direction of Travel Consultation document includes a request for landowners to identify sites in the borough that may be suitable for future development.
- 1.2 The following representations identify the Harlequin Football Club site (also known as the Twickenham Stoop) and the adjacent Twickenham Central Depot site as a major mixed-use redevelopment opportunity. Harlequin Football Club has been in dialogue with the Council regarding this opportunity for a number of years.

### **2. Site Description**

- 2.1 A site location plan is included as Appendix A, and a detailed description of both sites is set out below. The combined total area of both sites is 9.7 hectares, which represents one of the largest and most important strategic redevelopment opportunities in the entire borough.

#### ***Harlequin's Site***

- 2.2 Harlequin Football Club Limited, the site owner, is located on a triangular parcel of land to the south of the A316. The Site is bounded to the west by the "Duke of Northumberland River" and beyond that by the large Rosebine car park and an estate of residential properties which form part of the Rosecroft Gardens Conservation Area. Richmond Upon Thames College is located to the east of the site, itself going through a major redevelopment.
- 2.3 The stadium comprises four stands, the Eastern Stand was constructed in 1996 and has a capacity for circa 4,042 spectators, with accommodation at ground and first floor level which is utilised for corporate hospitality and entertainment on match days and corporate events / meetings and private functions on non-match days. The southern end of the ground was redeveloped in 2006, with the demolition of the existing uncovered stand and



the installation of a temporary Southern Stand which holds a capacity for circa 4,100 spectators, with ancillary educational facilities beneath.

- 2.4 The Western end of the ground was redeveloped in 2005, with the demolition of the previous Western Stand and groundman's house and installation of a covered stand with a capacity for 3,881 spectators along with ancillary features including, players and officials facilities, club offices, club shop, a Members bar, 13 corporate hospitality boxes, an Executive club and two lounges.
- 2.5 To the east of the Eastern Stand lies a triangular parcel of accessible open land, which had previously been utilised by the club for training along with hospitality events. In 2005, planning permission was granted for the development of a four-storey block of flats (67 units) on a portion of the open land as enabling works to fund the development of the Western Stand. The residential block includes both social and private housing and is known as "Challenge Court". The remaining area of open land has been retained as publicly accessible open space.
- 2.6 Substantial open car parking facilities are provided on site between the stadium and the A316, providing approximately 400 on site car spaces.
- 2.7 A Nuffield Health Gym is located on the eastern boundary of the Site and is within the land ownership of Harlequin Football Club.
- 2.8 Vehicular access to the Site is provided via the A316, with a left turn into / out of the A316. The access road also serves the Twickenham Central Depot, with a branch route into the College Site, for use as an emergency access route by the club. The College has a right of access to use Langhorn Drive to serve its site. This junction is being significantly upgraded in the summer of 2020 to provide a traffic light left and right turn junction and new street level crossing.
- 2.9 The Duke of Northumberland River forms the western boundary of the Site, with the Twickenham Central Depot and area of green open space located to the south of the Site.

#### ***Twickenham Central Depot Site***

- 2.10 The Depot Site, owned by Richmond Upon Thames Council, is located immediately to the south of the Harlequin's stadium. The Site is bounded by the Richmond Upon Thames College Site to the north-east, and the Craneford Way recreation area with playing fields and children's playground to the east. The western edge of the Site lies along the path of the Duke of Northumberland River, with residential properties at Rose Croft Avenue beyond, and the main London to Reading railway line to the south.
- 2.11 The West London Waste Plan (2015) identifies that the Site has been used for the following purposes:
  - for the parking of refuse and recycling vehicles;
  - material recovery facility (MRF); and

- bulking facilities to support municipal recycling services, for a continuous period over the last 10 years.

2.12 There are a few structures currently onsite, including a two-storey residential property, prefabricated offices, a redundant Victorian brick building also known as the former pumphouse, bulking bays, workshops and covered vehicle storage.

### 3. Housing Need

3.1 The Local Plan Direction of Travel Consultation document identifies housing delivery and meeting the housing targets set out in the London Plan as one the key reasons why a new Local Plan is required.

3.2 The Intend to Publish version of the London Plan (December 2019) provided Richmond with a new housing target which was substantially higher than the target set out in the adopted London Plan. The ten-year delivery target for the period from 2019/20 to 2028/29 is 6,440 new homes, which equates to 644 units per annum. The Direction of Travel Consultation document states that 315 new homes per annum will be delivered in the borough between 2015 and 2025, which highlights a major shortfall.

3.3 To compound this particular issue, publication of the Local Plan Direction of Travel Consultation has been followed by a letter from the Secretary of State for Housing, Communities and Local Government to the Mayor of London, directing him to make changes to the new draft London Plan before it can be adopted. A relevant extract from the letter states:

*"I had expected you to set the framework for a step change in housing delivery, paving the way for further increases given the next London Plan will need to assess housing need by using the Local Housing Need methodology. This has not materialised, as you have not taken the tough choices necessary to bring enough land into the system to build the homes needed."*

3.4 Taking account of the above, one can expect that housing targets for individual boroughs will further increase in the short term. Through the new local plan process, it is therefore imperative that the Council seeks to promote the consolidation and intensification of large underutilised sites in the borough and targets the least constrained sites for higher density development. It is our strong view that redevelopment of the Harlequin's site and the Twickenham Central Depot site can make a significant contribution to achieving these targets, whilst at the same time easing the pressure on other more sensitive parts of the borough.

3.5 As suggested in the Direction of Travel consultation document, we support the undertaking of a borough wide Urban Design Study as a tool to help identify redevelopment opportunity sites and quantify the appropriate scale of development on individual sites.



## 4. Potential Land Uses

4.1 Through a well-designed Masterplan, and allowing for densities to increase on this important strategic site, we believe that it is capable of accommodating a wide range of uses, including the following:

- A significant quantum of new homes, including affordable homes, with a mix of tenures and sizes
- A new sports stadium, subject to demonstrating long term viability
- A consolidated multi-function Council Depot
- Workspace, conference and exhibition space, including incubator space for start-up businesses
- Hotel
- Student accommodation
- Health and Leisure facilities
- Retail, including bars and restaurants within the stadium

## 5. Site Opportunities

5.1 Redevelopment of the site to deliver such uses offers significant opportunities at a local, regional and national level for the reasons set out below.

1. **Making More Efficient Use of Land** - The existing site as a whole and particularly the existing Twickenham Central Depot is inefficient, uses more land than it needs and requires investment. A phased mixed-use redevelopment will make more efficient use of this important site in accordance with the National Planning Policy Framework and draft London Plan.
2. **A Masterplan led, Mixed Use Neighbourhood** - A thoughtfully-designed, residential and mixed-use neighbourhood that promotes health and well-being for all, including local convenience retail.
3. **Contribute Significantly to Meeting Housing Need** – Redevelopment of the site would contribute significantly to meeting Central, Regional and Local Government housing targets. There is significant marriage value of more homes from coordinated development of the depot site and the Stoop site together. A masterplan delivering significant numbers of homes of varying size and tenure would generate a substantial New Homes Bonus to Richmond, and of course significant CIL and S106 contributions.
4. **New Leading-Edge Sustainable State of the Art Stadium for Harlequins** – A viable overall scheme incorporating a new Harlequin's home 25,000 seat stadium and associated enabling development will generate multiple economic and social benefits for the borough, and secure the long-term future of Harlequins in this location.

5. **A Safe and Sustainable Community** - Creating a place that enables community ownership and participation; a place with identity where you know your neighbours and your neighbourhood.
6. **Creating a Well Connected & Easy to Navigate Neighbourhood** - A people-focused neighbourhood which prioritises pedestrians, cyclists and public transport connections, underpinned by a simple and easy to navigate network of streets and routes.
7. **Designing for the Future Residents of Richmond** - A leading edge sustainable development, with the aspiration to deliver a highly sustainable stadium better than anything done before as well as zero carbon housing and utilising new technologies, serving as an exemplar for development projects in the borough.
8. **Delivering New Public Open Space** - A series of landscaped public spaces with their own individual character creating considerate transitions between the scale of areas around the new neighbourhood and the stadium.
9. **Protecting and Enhancing the Existing Landscape & Ecological Assets** - Using the site's natural assets to actively inform the design of the neighbourhood and connect to wider green and blue networks to enhance local biodiversity and public amenity.
10. **A Collaborative Approach to Working with Stakeholders** - Working with the Council together with the local resident and business community in a fully collaborative way to develop shared goals and ensure that investment benefits the local population, and specifically working with Friends of the River Crane Environment (FORCE) to genuinely improve the river corridor.
11. **Cross Pollination with Richmond College** – A redevelopment of the site would facilitate the strengthening of ties with the regenerated Richmond College and create cross-over with their education syllabus and the professional training needs at Harlequins.
12. **Investment in Richmond** - Harlequins currently makes a significant financial contribution to the Borough. Independent assessments of Gross Value Add (GVA) demonstrate the Club's contribution equates to £34 million per annum. Using the same methodology, a new stadium with associated enabling development could increase Harlequin's GVA contribution to circa £95 million per annum.

## 6. Masterplan Concept

6.1 Harlequins needs to invest in its club for many reasons including:

- Customer expectations from sporting experiences;
- The changing nature of rugby for example women's rugby;
- Competitors improving their facilities;

- The ability to bring the existing training facility on site;
- To remain competitive; and crucially
- The ability to remain financially sustainable.

6.2 All of the above mean that doing nothing is not an option for the club. If comprehensive redevelopment is not achievable at the Stoop, Harlequins will be forced to relocate.

6.3 Harlequin Football Club Limited has engaged the services of a full professional design team to pursue redevelopment proposals for the site, led by Populous Architects and Karakusevic Carson Architects. The images overleaf give an early visual indication as to what could be achieved on this important site.

## **7. Next Steps**

7.1 Our team will continue to discuss our proposals with the Council and seek to engage with the local community. In the meantime, we trust that the Local Plan team will keep us informed as the consultation process progresses.

Indicative Site Plan





Sketch views of the proposed new neighborhood



Karakusevic Carson Architects



Karakusevic Carson Architects



Sketch views of the proposed new neighborhood



Karakusevic Carson Architects



Karakusevic Carson Architects

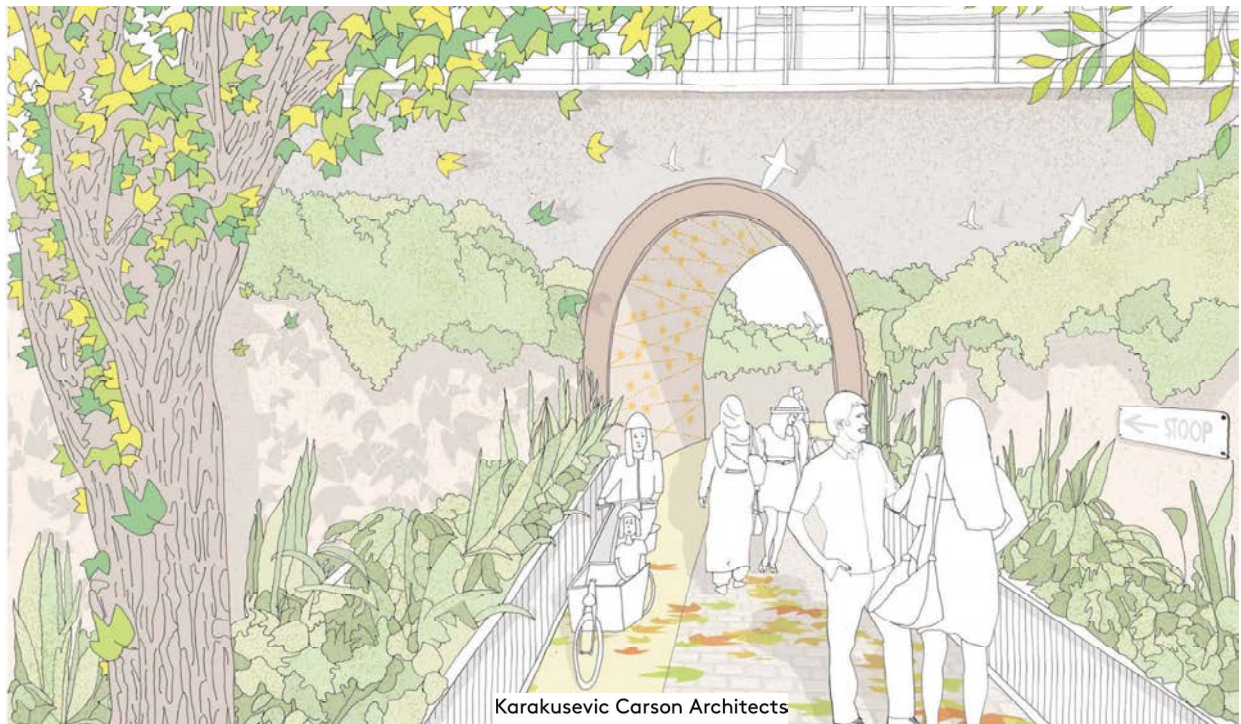


Sketch view of proposed new bridge over the Duke of Northumberland River



Karakusevic Carson Architects

Existing railway underpass improvements



Karakusevic Carson Architects

## **7 Next Steps**

- 7.1 Our team will continue to discuss our proposals with the Council and seek to engage with the local community. In the meantime, we trust that the Local Plan team will keep us informed as the consultation process progresses.

**APPENDIX 1**  
**SITE LOCATION PLAN**





- Harlequins Indicative Ownership Boundary
- LBURT Indicative Ownership Boundary



3<sup>rd</sup> June 2021



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Dear Sir or Madam

## **LONDON BOROUGH OF RICHMOND UPON THAMES EMERGING BOROUGHWIDE URBAN DESIGN STUDY**

On behalf of our client, Harlequin Football Club Limited, please find enclosed our written representations to the London Borough of Richmond Upon Thames (LBRUT) emerging boroughwide Urban Design Study.

We previously made representations to the LBRUT Local Plan Direction of Travel Consultation in April 2020, specifically identifying the Harlequin Football Club site (also known as the Twickenham Stoop) and the adjacent Twickenham Central Depot site as a major mixed use redevelopment opportunity. A copy of our previous representations is attached for ease of reference.

We understand that the emerging Urban Design study seeks to divide the borough into a series of distinct 'character areas', based on common features and characteristics such as building types, heritage, open space, land use, settlement pattern and sense of place.

The Council's website explains that defining, describing and evaluating the character areas will help LBRUT to understand what and where the potential opportunities are for future change. The Urban Design Study will also help the Council to follow a 'design-led' approach to achieve good growth, in the right places, as well as protecting the special qualities of particular areas and recognising where growth is not appropriate.

The Harlequin Football Club site (also known as the Twickenham Stoop) has been included in the 'Twickenham - Residential' character area, which comprises the majority of the Twickenham area excluding the Town Centre.

Our view is that the collection of adjacent sites comprising the Twickenham Stoop, the Twickenham Central Depot and the Richmond Upon Thames College is very different in character to the surrounding area, both in terms of existing land uses (sport, leisure, education, employment & residential uses) and the existing scale of development. The site benefits from a prominent main road frontage to the A306, does not incorporate any heritage assets and is generally inefficient in terms of its use of land. It presents significant opportunities for redevelopment.

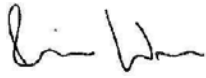
For these reasons we submit that this smaller area merits its own character area designation to be titled Twickenham - Mixed Use.

We welcome the proposed engagement with young people to inform the Urban Design Study, but also consider it appropriate and necessary for the Council and its appointed consultants to engage

directly with major landowners in the borough at an early stage in the process to best understand their short, medium and long term aspirations.

We trust that we will be kept informed during the next stages of the consultation process, and in the meantime, please contact me directly should have any queries.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Richard Ward', written in a cursive style.

**Richard Ward**  
**Board Director**  
**DP9 Ltd**

## **APPENDIX 1 – CURRENT DRAFT MASTERPLAN**



- 1. Classroom Extension
- 2. Sports Facilities
- 3. Performing Arts
- 4. Sports Pavillion
- 5. Sports Pitches



**RIBA 0**

REVISION	DATE	DESCRIPTION	ARCHITECT PARTNER
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CHECK ALL DIMENSIONS AND VERIFY ON SITE. REPORT ANY ERRORS OR OMISSIONS

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JOB TITLE:  
**KNELLER HALL SCHOOL**

DRAWING TITLE:  
**MASTERPLAN DEVELOPMENT PROPOSALS**

SCALE: <b>As indicated</b>	DRAWING SHEET SIZE: <b>A3</b>	
JOB CODE: <b>001506</b>	DRAWING NUMBER: <b>0019</b>	REVISION:

**1**

# Masterplan Development Proposals

1 : 2000

## **APPENDIX 2 – LETTER FROM PROJECT COST CONSULTANTS**





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Date: 27/01/2022

Our ref: 1629

Spatial Planning and Design  
LB Richmond upon Thames  
Civic Centre  
44 York Street  
Twickenham  
TW1 3BZ

Dear Sir or Madam,

**RE: DRAFT LOCAL PLAN PRE- PUBLICATION REGULATION 18 CONSULTATION – APPENDIX 2  
– COST PLAN AND ESTIMATED BUDGET ASSOCIATED WITH THE PROPOSED PROJECT**

LXA has been appointed by Dukes Education Group and Radnor House School, to provide Project Management, Quantity Surveying and Design services associated with the proposed project at Kneller Hall. The proposed masterplan is as set above in the main contents of the letter by DWD, pages 2-4, "Proposals for Kneller Hall".

Our client has acquired the freehold interest in the entire site. The ambition of Dukes Education is to be at the top of the education sector, and continuously evolve to achieve this, investing both in assets and human resources. The acquisition investment and further investment into the construction and conversion works at Kneller Hall is a key part of their ambitions.

They have now committed to this significant investment, in order to provide a prestigious educational setting in Kneller Hall for the future students. This represents one of their biggest investments so far, for Dukes Education, taking into consideration the existing site that was bought for this purpose, and Grade II Listed buildings within, it makes it one of the most exciting too.

LXA has undertaken a thorough cost analysis and produced a cost plan for the proposed works. It is a draft cost plan at this stage and it will need to be updated as the proposals are refined with the client and through engagement with the London Borough of Richmond Council.

There are significant costs currently forecast to restore and convert the three listed buildings (Kneller Hall, Guard Room and Band Practice Hall). The works associated with these building alone are estimated to cost over £7million. This investment into the buildings is to remove the unsympathetic alterations undertaken by previous owners; to undertake repair works to restore the properties and to ensure their long term protection; and to ensure the works associated with the school use are undertaken sympathetically. Kneller Hall is proposed to be converted to provide 6<sup>th</sup> form teaching accommodation, the Guard Room and Band Practice Hall will also be converted to teaching spaces, most likely for music and drama. As well as this initial investment, there will also be ongoing maintenance costs that Dukes are committed to undertaking to ensure the long term protection of the listed buildings.

In addition to the investment associated with the listed buildings, Dukes are making further significant investment at the site to provide high quality and modern teaching facilities and sports



facilities. The forecast costs to restore the existing accommodation sites and to deliver new build teaching accommodation, a Multi-purpose Sports Hall and a Performance Auditorium are forecast to cost around £13.5million. Further to this, works to the Forest School, Pavilion, Bandstand and external landscaping will cost a total of around £2.5million.

Further costs associated with this project include preliminaries, internal furnishings and professional fees to be in the vicinity of £6million.

Total costs for the full construction and delivery of the project have been estimated at around £29million excluding VAT.

Alongside our client we are working to obtain further structural advice, heritage advice and other specialist input and guidance, to enable us to further refine the costs associated with restoring and refurbishing the listed buildings and also delivering the new build accommodation.

The costs associated with restoring and refurbishing the listed buildings are a significant proportion of the overall costs. Dukes have shown particular interest, appreciation and respect for historical buildings as many other of their schools are accommodated in Listed Buildings. They are therefore experienced at converting listed buildings sensitively to meet modern education needs. Heritage specialists are advising on the works to the listed building, to ensure that these works are undertaken to a high standard and are sensitive to the building's historic significance.

If the Council would like any further information at this stage on our involvement and the costs associated with the scheme, we would be happy to discuss this further with you.

Yours sincerely

*Adam Forster*

Adam Forster  
Quantity Surveyor

## Query/objection on siting of tall building zone - North Sheen

Page 111 of the proposed Local Plan  
Regulation 18; **Site Allocation 28 – Homebase, Manor Road**

The site has been allocated as being suitable for a tall-building zone, and a mid-rise buffer zone, following on from the findings in the Urban Design Study 2021

*The Urban Design Study 2021 identifies part of the site as a tall building zone (7-8 storeys), with a mid-rise zone buffer (5-6 storeys), in accordance with Policy 45 Tall and Mid-Rise Building Zones*

While not against development of this site and provision of much-needed new homes and/or social housing, **I strongly object to the siting of buildings above 6 storeys on this site, due to the severely detrimental effects regarding overshadowing, loss of light, and overbearing and deleterious impact on the surrounding roads of locally designated character buildings of townscape merit.**

The site is not in a town centre, nor close to an 'accessible' transport hub, and such, **the siting of mid-rise, and especially tall buildings here, directly contravenes Policy 45; Parts A 1,2,3,4,5,7,& 9 regarding Visual Impact/Spatial Hierarchy; Parts B 1,2,3, & 4 regarding effects on character of surroundings; and additionally Policies 44 & 28, regarding local character and design quality.**

Further, **the damage to existing residents' wellbeing due to overshadowing and loss of light for long periods of the day, leaving some below BRE standards, is in direct contravention with Policy 46; Amenity and Living Conditions; Parts 1,3 & 4, regarding unacceptably adverse impact on neighbours from loss of daylight and negative impact on enjoyment of their homes and amenity.**

The proposal for this site seems not to have followed the central siting recommendations as it has for other sites: the tall and mid-rise building zone for the Homebase isn't positioned central-southerly where it would have the least impact on existing residents... Rather, it's positioned at the NW edge of the site, with no true buffer zone, and so forgets that there are houses directly the other side of the railway, and further, neglects to take in to account the southerly position of the sun in the Northern hemisphere where shadowing is always worse and most detrimental to those northerly of taller developments. As such, it will cast long shadows over the NW residents for most of the day in winter, all the way across St George's, Bardolph, Victoria Villas, Trinity etc & beyond Raleigh Road.

When you look more closely at the 'heat map' in the Urban Design Study (p.255, and pasted below for reference) no true or sufficient buffer has been given to residents on the NW of the site, especially those directly next to the railway/site border on Bardolph Road and the southerly side of St. George's Road. These residents, along with those on Trinity Road and Trinity Cottages, are those who stand to be most detrimentally affected by taller buildings on the site blocking their light and overshadowing, especially in winter months. Residents on Bardolph Road and the end of Trinity Rd and Trinity Cottages will have their homes left below acceptable BRE standards for light.

The report mentions the locally designated buildings of character on the South/Easterly side of the development on Manor Grove and the surrounds, and does provide some lower-rise buffer for these homes, but it completely neglects to recognise the equivalently designated Buildings of Townscape Merit (small Victorian character cottages) on St. George's Road, Trinity Road, and Trinity Cottages.

**Anything above 6 storeys will swamp these locally designated buildings of character and local merit, and have a significantly deleterious impact on daylight of existing residents, directly contravening Policies 28, 44, 45 and 46.**

Homebase site Urban Design building zone map:



North Sheen, Lower Richmond Road: Tall and Mid-rise building zones



Existing prevailing height: 3 storeys

Appropriate height: 7-8 storeys (21-24m)

The zone includes the site of the existing Sainsburys supermarket and car park, to the south of Lower Richmond Road. The western part of the zone occupies the Homebase site, which recently received consent for buildings up to 11 storeys<sup>1</sup>. If the site should come forward again in future, the recommendations from this study are that appropriate heights for the zone are up to 8 storeys to respect the small scale of the surrounding area. There are opportunities for some height within parts of the zone, although any development should assess any potential impacts on views and amenity with respect to the 2 storey, locally listed residential terraces on Manor Grove to the south. The zone is set back from Lower Richmond Road.

Mid-rise zone: Appropriate height: 5-6 storeys (15-18m)

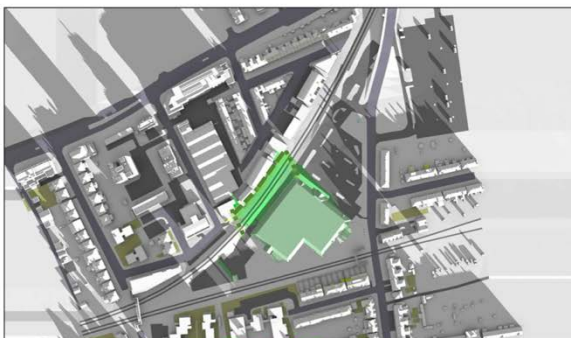
The mid-rise zone provides a transition to the smaller scale of the surrounding character area.

The Daylight and Sunlight report from the Avanton proposals for the site, demonstrates this issue well. The green shadows are today's profile (Homebase), and the blue shadows are the result of the 8,9,10, and 11 blocks on the site – **it can be seen that even the 8-storey blocks cast long shadows all the way across the A316/Lower Mortlake Road and on to Rayleigh Rd and Stanmore Rd:**

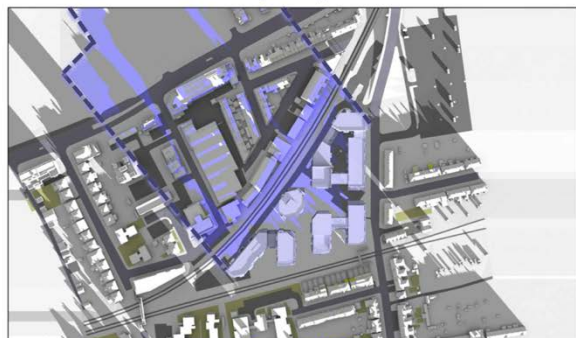
### OVERSHADOWING OF NW RESIDENTS:

HOMES AND GARDENS IN SHADOW FOR OVER 50% OF DAY IN WINTER

#### EXISTING SHADOWS (GREEN):



#### RESULTING SHADOWS (BLUE):



December 21st (GMT)

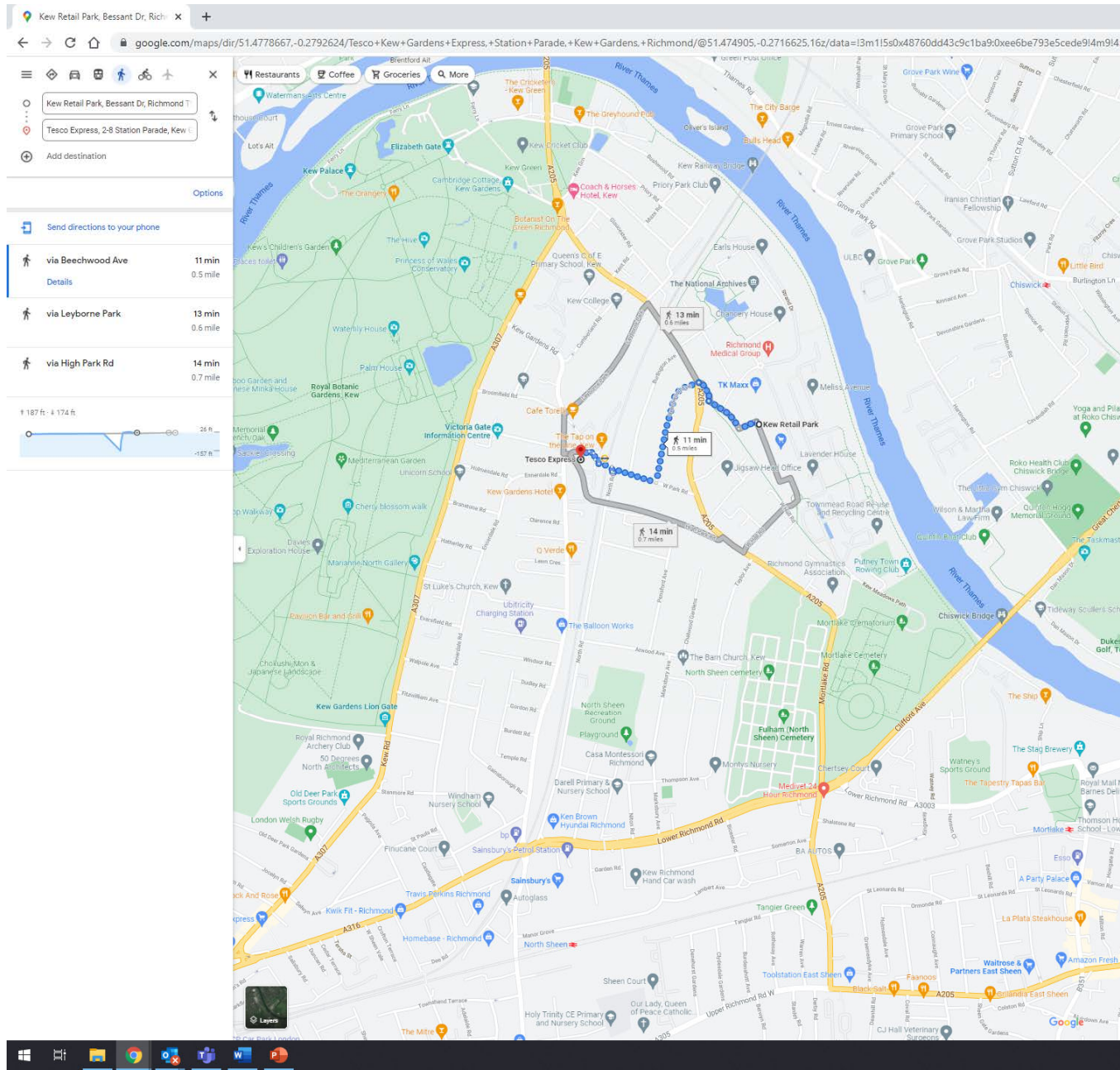
I note that other mid-rise designated sites in the study, for Ham, The Stoop, and Kew Retail Park, have much more sensitive height allowances and buffer zones to the North. I would welcome a discussion as to why the Urban Design Study doesn't follow its own Guiding Principles for the Homebase site, and why the Council has not looked in more detail at the deleterious impact of buildings over 6-storeys here, given that it so plainly objected to the Avanton proposals for tall buildings on this site previously, for the very same, important reasons I have outlined above.

## **Appendix A**

### Walk-time to Supermarkets

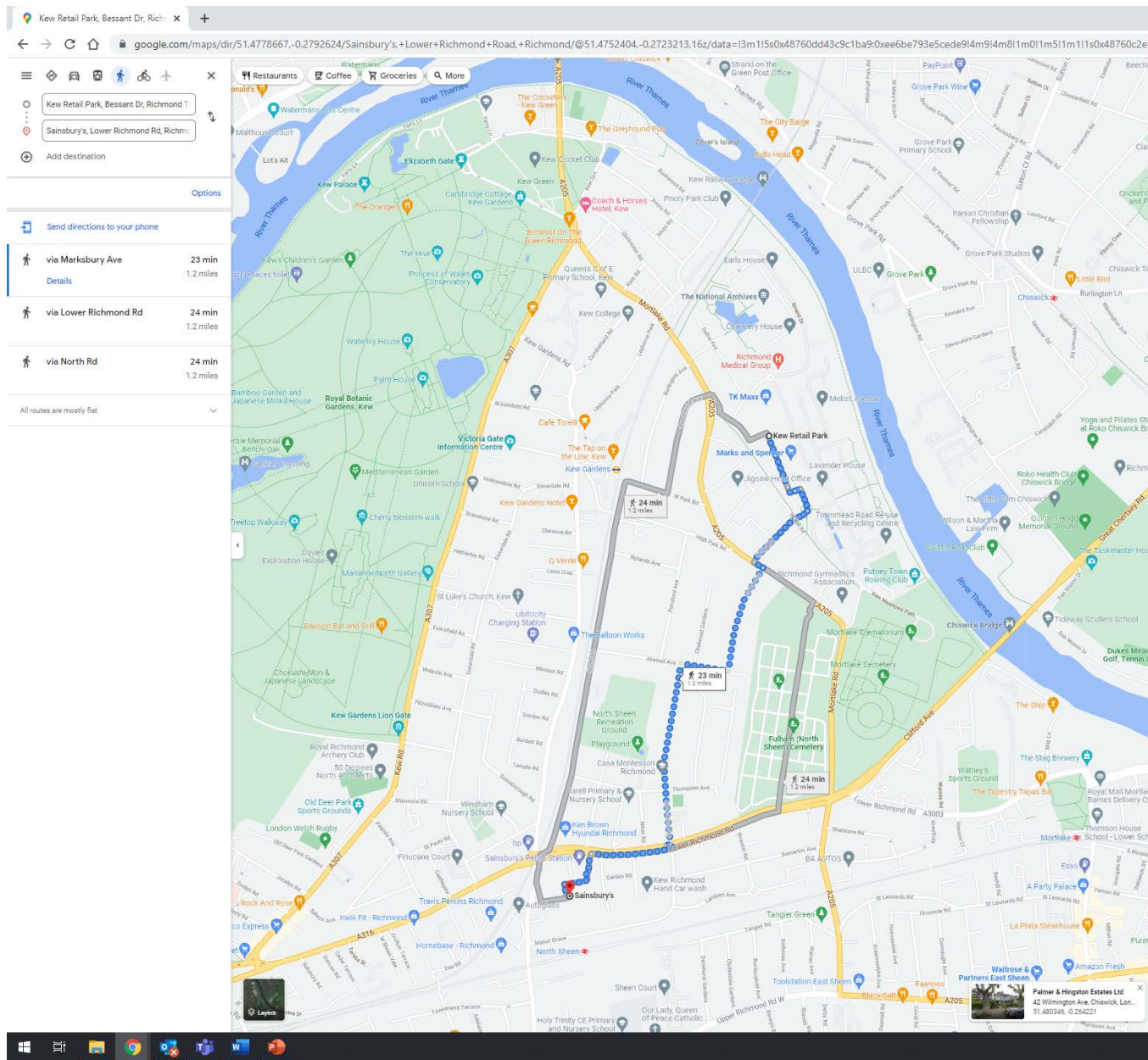


Tesco Express, 2-8 Station Parade, Kew, TW9 3PZ



Source: Google (January 2022)

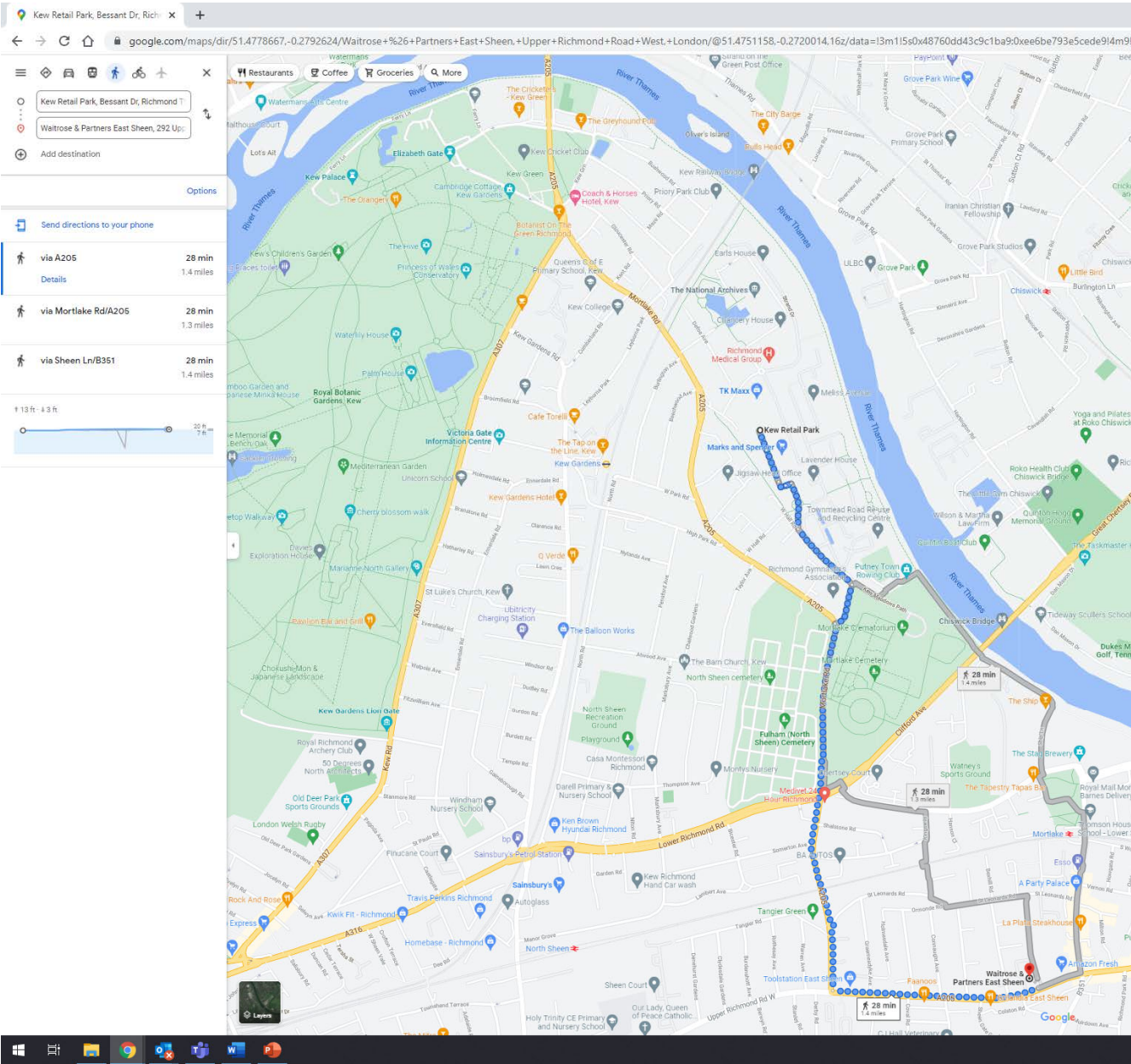
Sainsbury's, Lower Richmond Road, TW9 4LT



Source: Google (January 2022)



Waitrose, Upper Richmond Road, East Sheen, SW14 7JG



Source: Google (January 2022)



## **Appendix B**

### Site Ownership Plan



**Notes**

Do not scale from this drawing.  
 All dimensions must meet the above and be responsible for setting and checking  
 dimensions.  
 All dimensions must be taken from the approved drawings only.  
 Any discrepancy between drawings, specifications and site conditions  
 shall be brought to the attention of the responsible officer.  
 This drawing is the property of the responsible officer.  
 This drawing is prepared for the specific project and is not to be used for any other purpose. Whilst  
 all reasonable efforts are made to ensure the accuracy of this drawing, it is not to be used  
 for any other purpose, or as evidence of the plan in any way.  
 For purchase of this drawing, please refer to the Drawing Office below.

Rev	Date	Description	Drawn	Check
Drawing Status				
DRAFT				
Client				
				
				
JTP Studio, Ltd. The Kew Quarter London, SW10 0JF Tel: 020 8107 1700 info@itp.co.uk				
Project				
The Kew Quarter				
Drawing Title				
Ownership Plan				
Scale: 1:500 Drawing No: SK_023 Date: 01/05/2014 Version: 1.0				
				



# Implementing the Thames Estuary 2100 Plan in the London Borough of Richmond upon Thames

October 2020

This document sets out the London Borough of Richmond's role in delivering the Thames Estuary 2100 Plan (the Plan), as well as key messages for you to use when engaging on the Plan with partners and stakeholders. It is aimed at a variety of different teams likely to be involved in delivery. These include those involved in strategic planning, development management, regeneration, infrastructure delivery, flood risk management, and emergency planning.

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What is the flood risk policy for Richmond? .....	3
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## What is the Thames Estuary 2100 Plan?

The Plan sets out how the Environment Agency and our partners can work together to manage tidal flood risk in the Thames Estuary, adapt to a changing climate and plan for the future of our riverside, today and into the next century.

It aims to manage tidal flood risk through a series of upgrades to the flood defence system, including the Thames Barrier and other barriers, as well as the walls, gates, and embankments along the Estuary. In some places, fixed flood defences (like flood walls and embankments) will need raising by 1 metre. As the Plan was designed to be adaptive, the timing and nature of these upgrades are dependent on climate change projections and the rate of sea level rise.

The Plan has 3 phases of activity:

- Until 2035 – maintain and improve current flood defences, safeguard areas of land required for future improvements to flood defence, influence local plans and strategies, and monitor how the estuary and the climate is changing
- 2035-2050 – raise flood walls and embankments, improve smaller barriers whilst reshaping the riverside environment through development, decide around 2040 on the end of the century option for the future of the Thames Barrier





- 2050-2100 – implement the option for the future of the Thames Barrier, and adapt other flood defences as required to work alongside this to protect the estuary.



## What does the Plan mean for Richmond?

### Key messages

- Richmond is affected by both tidal and fluvial flooding and this interplay is complex. The tidal flood defences provide protection against the highest water levels that are permitted through the Thames Barrier. Fluvial flooding from the Thames also occurs on the Richmond frontage and the Thames Barrier is currently used to lower water levels during fluvial floods. There are also fluvial flooding problems on the River Crane and Beverley Brook that are exacerbated by high tidal water levels in the Thames.
- The Plan's requirements for Richmond include future raising of all tidal flood defences, together with an ongoing programme of inspection, maintenance, repair and replacement of defences as required. Corridors of land alongside the existing defences should be safeguarded to provide space for these works. You have a responsibility to maintain and raise any defences you own, as well as ensuring that proposed works to third party defences align with the requirements of the Plan through your role as a local planning authority.
- Eel Pie Island at Twickenham is accessed via a footbridge and contains residential properties and boatyards. The defence crest levels are lower than the main tidal defences and flooding can occur during fluvial events. The island benefits from the current practice of closing the Thames Barrier during fluvial flood events to reduce flood levels in west London
- The future raising requirements of the flood defence levels in Richmond are as follows:
  - **Raising of all defences along the Thames by up to 0.5m by 2065, and by an additional 0.5m by 2100;**
  - **Raising of defences on Eel Pie Island by up to 0.8m by 2065, and by an additional 0.5m by 2100.**

This allows for projected increases in sea level to 2135.

- The tidal flood defences in Richmond are 'hard defences', mostly masonry structures. Most of the hard defences could be raised within the existing defence footprint (or with only a small increase in width) but the structures would be tall, unattractive and would restrict public access and views of the estuary. However, if future raising is planned for and integrated into your future plans for the riverside, there are instead significant opportunities to improve the riverside when defences are raised, repaired or replaced, with the potential to improve public spaces, access, and to create new habitats. This is referred to in the Plan as **the riverside strategy approach**.
- Thames Estuary Asset Management 2100 (TEAM2100) is a programme of works to investigate flood defences and identify priority works needed to repair existing defences to maintain the current standard of protection across the estuary. Where priority works are identified, we will work with riparian owners who will be required to carry out the necessary works or to contribute to them in line with their riparian responsibilities and the Metropolitan Flood Act. The TEAM2100 programme is one of the first key steps to delivering the Plan; these assessments will enable us to develop a prioritised programme of future asset management works. A proportion of the programme is funded by central government; however, we are required to secure contributions from those who benefit from protection in the estuary. We can share further information on specific projects and funding gaps, as well as seek support in finding contributions as the programme develops.
- We are now working on the first full review and update of the Plan since it was published in 2012. This is an opportunity to learn from the first 10 years of implementation and make changes to our ways of working; making it easier for everyone to access, understand and use the Plan. The review will use the latest evidence and data, expertise and collective knowledge, to revise the recommendations in the current Plan; ensuring we can continue to protect the Thames Estuary from rising sea levels, achieve the wider benefits that come with reimagining our riversides to accommodate upgraded defences, achieve the best value for money and remain at the forefront of climate adaptation. As a council, you have a key role to play in this Review. This is your opportunity to influence how we collectively deliver the Plan and your role within that.
- We encourage you to act as an advocate of the Plan so that it is understood throughout your council as well as with your external partners, and to ensure Thames Estuary 2100 Plan is reflected in key documents and plans.

## What is the flood risk policy for Richmond?

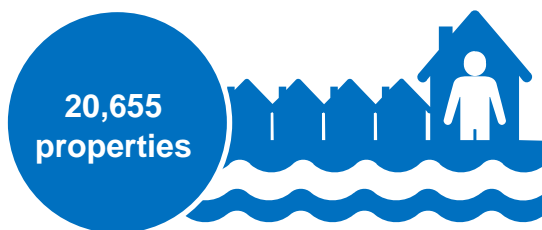


The Plan divides the estuary into 23 policy units which are each assigned a flood risk management policy depending on the acceptable level of flood risk based upon what is being defended. Policies dictate the programme of flood defence maintenance and improvement activities.

The Barnes & Kew policy unit has a Policy P5, to **take further action to reduce flood risk beyond that required to keep pace with climate change**. This means that the standard of protection against tidal flooding will be increased in the future. This will be achieved by improvements to the main tidal flood barrier on the Thames (currently the Thames Barrier at Charlton) together with improvements to the other flood defences e.g. river walls.

As Richmond is affected by both tidal and fluvial flooding the Richmond and Twickenham policy units have a P3 (fluvial) and P5 (tidal) policy. Twickenham and Richmond policy units must have a P5 Policy for tidal flooding because the Thames Estuary 2100 Plan will allow higher water levels upriver of the Thames Barrier in the future. This will be on a regular basis. To offset this the flood defences in Twickenham and Richmond must be raised in the same way as other defences upriver of the Barrier to prevent regular tidal flooding of the riverside. The P3 policy is exclusively for fluvial flooding, **to continue with existing or alternative actions to manage flood risk accepting that the likelihood of flooding will increase because of climate change**. This is because how we use the Thames Barrier to manage flooding may change, this is to prolong the life of the Thames Barrier to protect from tidal flood risk.

## Key facts



... **at risk of flooding** from rivers and the sea Richmond. This is under the present day extreme flood event without defences in place. With the impacts of climate change, this risk is expected to increase.

The **Twickenham policy unit** in Richmond includes residential areas, parks and gardens, and contains an extensive flood risk area between the River Thames and the River Crane. Our recommended works within this policy unit up to 2050 will provide the following benefits (which includes benefits outside of your borough's boundaries):



The **Richmond policy unit** consists of a relatively narrow floodplain along the Thames, much of which is occupied by parks and gardens. The amount of property at risk is small but there are some historic and important sites including Ham House and part of Kew Gardens. Our recommended works within this policy unit up to 2050 will provide the following benefits (which includes benefits outside of your borough's boundaries):







The **Barnes & Kew policy unit** contains residential areas and some important open areas including Kew Gardens and the Barnes Wetland Centre. Our recommended works within this policy unit up to 2050 will provide the following benefits (which includes benefits outside of your borough's boundaries):



The tidal flood defences in Richmond include the following:

- Fixed defences on the Thames and the lower reach of the River Crane.
- Smaller fixed defences on Eel Pie Island.
- The Crane gates that prevent high water levels in the Thames entering the River Crane.
- Drainage outfalls with tidal flap gates to prevent flow from the Thames into the drainage systems. These include the Beverley Brook outfall and the two diversion culverts referred to below.
- Richmond and Teddington locks. Whilst not tidal defence structures, these are the river control structures on the Thames in west London.

The tidal flood defences provide protection against the highest water levels that are permitted through the Thames Barrier. Fluvial flooding from the Thames also occurs on the Richmond frontage and the Thames Barrier is currently used to lower water levels during fluvial floods. There are also fluvial flooding problems on the River Crane and Beverley Brook that are exacerbated by high tidal water levels in the Thames. There are two diversion culverts on Beverley Brook which discharge fluvial flows but these are also affected by tide lock from high tidal water levels. There are also a number of drainage outfalls with tidal flap gates to prevent flow from the Thames into the drainage systems. The drainage outfalls into the Thames may require improvement as the sea level rises and storm rainfall increases, because drainage of the floodplains will become more difficult. The [map of land use requirements \(page 6\)](#) shows the Plan's requirements for these defences.



## Roles and responsibilities

### Environment Agency

Developed the Plan in partnership with key stakeholders, now act as custodians and work with partners to ensure delivery.

Develop and curate an annual Implementation Plan which outlines the actions that need to be taken to successfully implement the Plan.

Regulate permits for works to flood defences, inspecting defences, and work with councils and developers to ensure a statutory advisor in the planning process to ensure that developments align with the Plan's requirements.

As TEAM2100 Project team delivering the first 10 years of tidal flood defence asset management under the Thames Estuary 2100 Plan.

Work in partnership with beneficiaries in the Estuary to secure funding and deliver greater value for public money through innovation, collaboration and joint planning. Consult relevant officers at Richmond Council as projects progress within its boundary.

### Thames Estuary 2100 Plan



### Riparian Owners

If you own land immediately adjacent to a flood defence, you are considered the asset owner.

Riparian owners are responsible for maintenance and repair of their asset, in agreement with the Environment Agency.

Riparian owners must ask permission before they: change, remove or build any flood defence on your land, or do any work within 16 metres of a tidal flood defence. They should also establish if works may also require planning permission.

### London Borough of Richmond upon Thames

As a Local Planning Authority and Lead Local Flood Authority, you have a role in delivering the Plan's recommendations.

Take local ownership of the Plan by helping to develop and implement the Plan. Ensure recognition and understanding at all levels of the council.

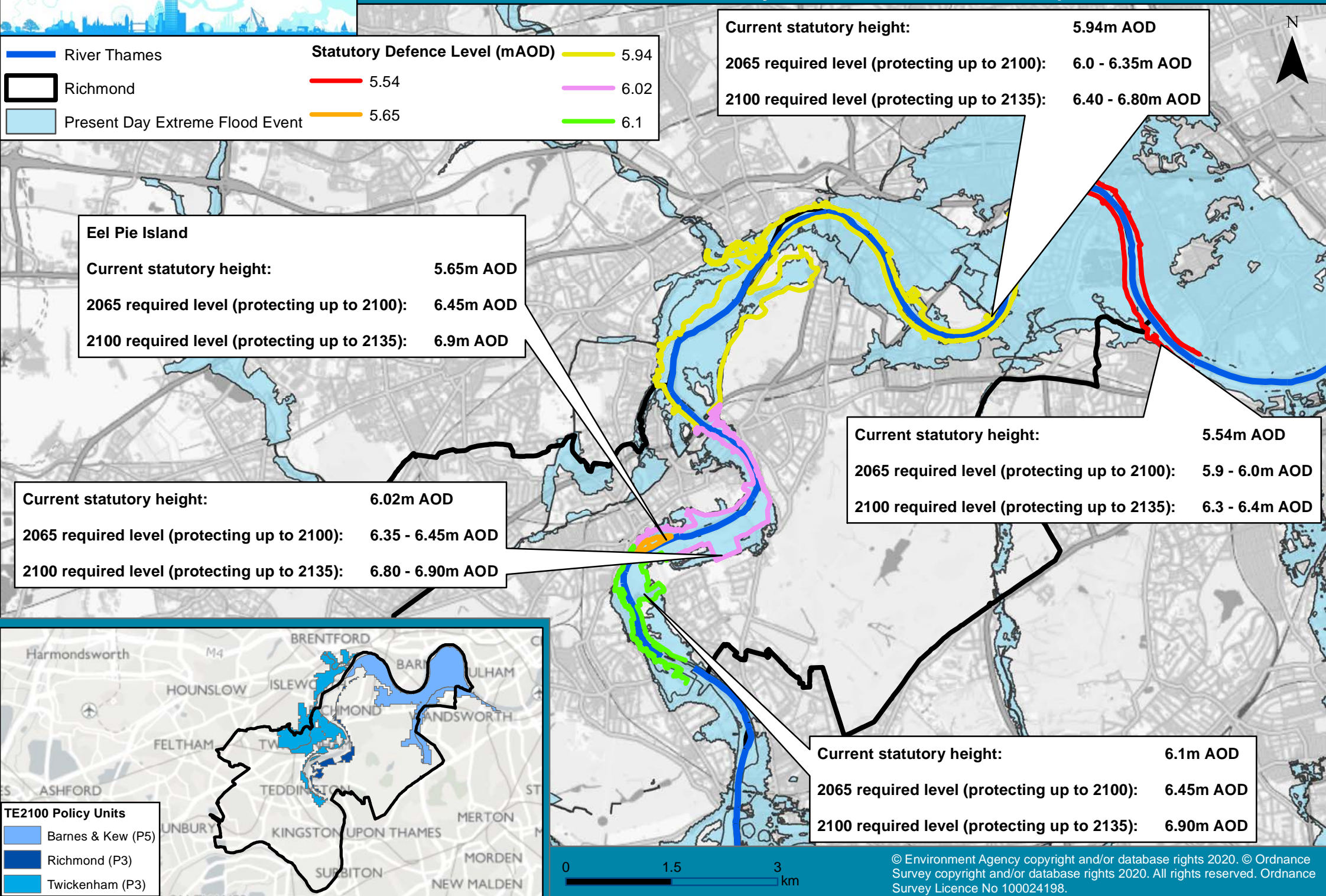
Support flood defence projects through raising of external contributions, ensure stakeholder buy-in and updating strategic planning documents.

customer service line  
03708 506 506

incident hotline  
0800 80 70 60

floodline  
03459 88 11 88

# Richmond - Thames Estuary 2100 Defence Requirements







## Your role in delivering the Plan

### As a Local Planning Authority

Your role as a Local Planning Authority is crucial in delivering the Plan's recommendations. The planning system provides significant opportunities to implement the necessary improvements to the tidal flood defences, such as raising to the required future heights and ensuring that the ability to deliver flood risk management requirements are not compromised through unsuitable development proposals. As the decision maker, you need to ensure individual planning application decisions and strategic planning documents align with the Plan's requirements in your borough. We will support you to do this in our role as a statutory consultee in the planning process.

### Planning policy and development proposals

We are a statutory consultee in the planning process for any developments in a flood zone or within close proximity to a main river defence. Through the planning system we require developers to demonstrate how flood defences will be able to be raised to Thames Estuary 2100 heights by the current and future deadlines set out in the Plan. They can do this by submitting plans and cross-sections which demonstrate how the defence can be raised to the required levels in the future, as well as maintained and repaired. This should include the provision of adequate space to do so.

However, developers may instead wish to raise the defences to the set heights earlier than those deadlines, for example during the initial redevelopment of the site. This can have many advantages for the development including reduced overall costs, less disruption to the site in future, and making the most of the space available through integration of the defences into the wider design of the site. If developers wish to pursue this option, we will be supportive of this approach provided defences are able to adapt to any other potential changes in the future.

To support this, and to ensure development proposals implement the wider recommendations of the Plan, we advise that your strategic plans and development management policies should include specific requirements for development along the tidal riverside to:

- Maintain, enhance or replace flood defence walls, banks and flood control structures to provide adequate protection for the lifetime of the development, including ensuring adequate provision of space for this in regeneration or local plan allocation areas;
- Demonstrate how the tidal flood defences can be raised to the required Thames Estuary 2100 levels in the future through submission of plans and cross-sections of the proposed raising. Where opportunities exist, this could be achieved through developers raising defences now to the required heights, as long as these are able to be adapted if required in future;
- Demonstrate the provision of improved access to existing defences, or where opportunities exist to realign or set back defences;
- Provide associated landscape, amenity and habitat improvements alongside defence improvements where appropriate, in line with the riverside strategy approach (see [Taking a riverside strategy approach](#) section);
- Safeguard land for future defence raising (see [Land requirements](#) section);
- Secure financial contributions from partners in order to enable flood defence works.

### Land requirements

Land is required for continued maintenance of the flood defences, and so corridors of land alongside the existing defence lines should be safeguarded for this reason. This should include sufficient space for vehicle and plant access for the ongoing maintenance and repair of the defences.



Additionally, when the defences come to be raised, space will also be needed for these defence engineering works. We suggest that the width of land that should be safeguarded for future flood risk management interventions on the Thames could be of the order of 16 metres. More space may be required especially if wider environmental and placemaking improvements are to be achieved. However, this will depend on the characteristics of the site, the defence type and any proposed riverside improvements, and should be discussed and agreed with us on a site by site basis.

### Taking the riverside strategy approach

There are significant opportunities to enhance your riverside environment both where defences need to be raised, but also where they are to be repaired or replaced. Whilst just raising the defences on the existing footprint (which in itself could prove both difficult and significantly more expensive) would achieve the flood risk management objectives of the Plan, it would not provide any wider landscape or environmental benefits, and could introduce structures that would be tall, unattractive and would restrict public access and views of the estuary. However, if planned for, there is the potential to achieve significant public realm and environmental improvements when undertaking flood defence work, including improved public spaces by the riverside, improved access to the river and an enhanced Thames Path, and the potential creation of new intertidal habitats.

The riverside strategy approach was introduced in the Plan as a way for those involved in shaping the future of the Thames riverside, including local planning authorities, to ensure the required future changes to the riverside take place in a planned and integrated way. This will maximise the potential environmental, social, cultural and economic benefits, and avoid raising the flood defences without considering the impact on the environment and communities which sit behind them. If implemented, the approach will create better access to the river and enhance the riverside environment, all whilst enabling the tidal flood defences to continue to provide protection from the increasing risk of flooding as a result of climate change.

There are a number of opportunities to implement the riverside strategy approach. This could be through developing a new standalone document, or via a combination of local plan policies, site allocations, supplementary planning documents, masterplans, planning performance agreements, marine plans, and green space strategies. For London boroughs, Opportunity Area Planning Frameworks (Mayoral supplementary planning guidance to the London Plan) can also play a part. Where a large amount of growth or change is expected along a stretch of the riverside, it is likely to be more appropriate to develop a standalone strategy or masterplan to fully integrate the changes to the defences with the opportunities for wider public realm benefits, and to set out an appropriate plan for the timing and phasing of interventions. In other areas, it may be sufficient to embed the aims and requirements within local plan policies and supplementary planning documents. However you achieve this, the riverside strategy approach should work in conjunction with any relevant strategies and be developed in collaboration with local stakeholders.

We have produced a separate guidance document which sets out our aspirations for the riverside strategy approach and what this means for you as our partner. See [Further sources of information](#) section.

### Funding

The original Thames Estuary 2100 Plan estimated that it would cost £3.3 billion to maintain and improve the current flood defence system until 2050, and a further £6-8 billion to improve and upgrade flood defences during the second half of the century. Almost 10 years in, we have a better understanding of the current defence system and climate projections; accounting for inflation, and the fact that flood defence assets are deteriorating more quickly due to sea level rise, we expect that these cost estimates will have increased. Through our 10-Year Review of the Plan, we will develop a better understanding of the costs and benefits of its delivery. This will include producing a long-term funding strategy which will set out options and recommendations for funding defence works. We will need to work with partners and experts to understand all of the options available for funding and the best approach to securing the funding needed.



There is a perception amongst developers and some infrastructure providers that someone else will provide and fund resilience to climate change. However, government Partnership Funding rules state we have to obtain contributions from those benefitting from flood schemes to top up flood defence grant in aid, so the assumption that full funding comes from government has to change.

To support this as a Local Planning Authority, you could include the defence improvement works in your Community Infrastructure Levy (CIL) Regulation 123 lists, with funding through CIL used to contribute to the costs of flood defence works. Similarly, Section 106 should be used to secure funding for works where possible. You should consider making applications for Housing Infrastructure Funds to support viability of developments where flood defence infrastructure is required.

### As a Lead Local Flood Authority

Your role as a Lead Local Flood Authority plays an important part in delivering the recommendations of the Plan. Where delivering your local flood risk management works, there should be an alignment with the required upgrades as set out in the Plan, as well as with the [National Flood and Coastal Erosion Risk Management Strategy for England](#), and any other relevant strategies.

In particular, there should be consideration of the interaction between tidal flood risk and the other sources of flooding, e.g. surface water. It is therefore necessary for you to have a strong awareness of what the Thames Estuary 2100 requirements are in your local area, including any improvements that will likely be required to drainage outfalls as sea levels rise and storm rainfall increases

If you require any support for your flood risk management schemes, please liaise with your local Environment Agency contact and Regional Flood and Coastal Committee Advisor.

## Environment Agency contacts

Contact for	Contact details
<b>Local Plan and development management enquiries</b>	KSLPlanning@environment-agency.gov.uk
<b>General Thames Estuary 2100 enquiries; including Riverside Strategies 10-Year Review, and TEAM2100</b>	ThamesEstuary2100@environment-agency.gov.uk

## Further sources of information

- The Thames Estuary 2100 Plan can be found via <https://www.gov.uk/government/publications/thames-estuary-2100-te2100>.
- We have a Thames Estuary 2100 Plan SharePoint site, accessed via <https://defra.sharepoint.com/teams/Team598/TE2100%20%20External%20Partner%20Site/Forms/AllItems.aspx>. You will need to request access the first time you open the link. Along with other helpful documents, including a copy of this briefing, it contains the guidance note on the riverside strategy approach.





- Flood risk activity permit information- Under the terms of the Environmental Permitting Regulations, a *Flood Risk Activity Permit* is required from the Environment Agency for any proposed works or structures, in, under, over or within 16 metres of a tidal flood defence asset, and in, under, over, or within 8 metres of the top of the bank of a watercourse designated a 'main river'. Details of lower risk activities that may be excluded or exempt from the Permitting Regulations can be found on the [gov.uk](https://www.gov.uk) website. A permit is separate to and in addition to any planning permission granted. The consent form and accompanying guidance can be found at: <https://www.gov.uk/guidance/flood-risk-activities-environmental-permits>
- Owning a watercourse- This is an Environment Agency guide that explains responsibilities and rules to follow for watercourses on or near your property, and permissions needed to do work around them. It can be found at: <https://www.gov.uk/government/publications/riverside-ownership-rights-and-responsibilities>



# Thames Estuary 2100: the riverside strategy approach

June 2019

The [Thames Estuary 2100 Plan](#) (the Plan) sets out how we (the Environment Agency) and our partners can work together to manage tidal flood risk in the Thames Estuary, from now until the end of the century. It is an adaptive plan, ensuring current standards of flood protection provided by the existing tidal defence system are maintained or improved taking into account the effects of climate change e.g. sea level rise. In order to do this, existing flood defences along the Thames and its tributaries will need to be maintained and improved, and in many places raised in height by up to 1 metre.

This document is aimed at those involved in planning for the future of the Thames riverside. It sets out our aspiration for the riverside strategy approach and what this means for you as our partner.

## What is the riverside strategy approach?

There is a great opportunity to enhance the riverside environment both where defences need to be raised, but also where they are to be repaired or replaced. Whilst just raising the defences on the existing footprint (which in itself could prove both difficult and significantly more expensive) would achieve the flood risk management objectives of the Plan, it would not provide any wider landscape or environmental benefits, and could introduce structures that would be tall, unattractive and would restrict public access and views of the estuary. However, if planned for, there is the potential to achieve significant improvements when undertaking flood defence work, including improved public spaces, access to the river and the Thames Path, and the creation of new habitats.

The riverside strategy approach was introduced in the Plan as a way for those involved in shaping the future of the Thames riverside, including local planning authorities, to ensure the required future changes to the riverside take place in a planned and integrated way. This will maximise the potential environmental, social, cultural and economic benefits, and avoid raising the flood defences without considering the impact on environment and communities which sit behind them.

If implemented, the approach will create better access to the river and enhance the riverside environment, all whilst enabling the tidal flood defences to continue to provide protection from the increasing risk of flooding as a result of climate change.

## What do we want to achieve?

We would like a riverside that is accessible to everyone, enhances the unique and varied environment of the Thames and protects from flood risk, promoting sustainable growth throughout the estuary and supporting the ambitions of the Government's 25-year Environment Strategy.

**But we can't deliver this alone.** We envisage our partners creating visions or strategies for their tidal riversides which outline how the improvements to the flood defence works will be incorporated into the wider riverside environment to ensure the opportunities provided by the Thames Estuary 2100 Plan are seized in full.

To be successful, this needs to be led by organisations who are shaping the riverside. This includes local planning authorities, developers, and other organisations with a planning remit, such as the Greater London Authority.



## What are the aspirations of the riverside strategy approach?

Flood defences are raised to the recommended height set out in the Plan, achieving our recommended flood risk policies

Development is setback from the river, providing space for maintenance, future defence raising, people, and the environment

Land needed now or in the future for flood defences is identified and available when required

The riverside best serves the needs of its communities and the environment, providing integrated environmental, social, and economic benefits

Development is not negatively impacted by flood defences (now and as a result of future raising) through holistic and innovative design

Intertidal habitat across the Estuary is created where appropriate

Local communities and river users have quality and uninterrupted access to the riverside, with a Thames Path running continuously along the Estuary

The riverside provides increased natural capital and supports local authority growth ambitions to be delivered sustainably

## And the risks of failing to plan for Thames Estuary 2100?

Flood defences raised with only the minimum functional requirement in mind, without integrating design with the surrounding area

Public access and views of the Thames are restricted, disconnecting people from enjoying a relationship with the river

Defence raising and upgrades are at a much greater cost to public spending due to challenges arising from a lack of planning for future requirements

Flood defence structures become tall and unattractive when raised

Development behind defences suffer from reduced views and land values due to higher defences cutting them off from the river

Opportunities are lost to create a better environment for river wildlife

Works become significantly more difficult as land hasn't been safeguarded for maintenance and the construction/footprint of upgraded defences

Opportunities are lost to regenerate and revitalise the riverside, with chances missed to fund defence works as part of wider developments



## How can you deliver this?

There are a number of opportunities to implement the riverside strategy approach. This could be through developing a new standalone document, or via a combination of local plan policies, site allocations, supplementary planning documents, masterplans, planning performance agreements, marine plans, and green space strategies. For London boroughs, Opportunity Area Planning Frameworks (Mayoral supplementary planning guidance to the London Plan) can also play a part.

Where a large amount of growth or change is expected along a stretch of the riverside, it is likely to be more appropriate to develop a standalone strategy or masterplan to fully integrate the changes to the defences with the opportunities for wider public realm benefits, and to set out an appropriate plan for the timing and phasing of interventions. In other areas, it may be sufficient to embed the aims and requirements within local plan policies and supplementary planning documents.

However you achieve this, the riverside strategy approach should work in conjunction with any relevant strategies and be developed in collaboration with local stakeholders.

## What is the Environment Agency's role?

We are committed to supporting our partners to deliver the riverside strategy approach. We are able to help you develop, promote and implement the approach, and we will commit our time and effort to do so.

More specifically, we can:

- Advise where defences will need to be raised in the future, by what time and to what height.
- Advise on where land is required for our inspection and maintenance of flood defences, including flood walls and flood gates.
- Advise on where land is required for other flood risk management purposes such as a future Thames Barrier or to provide intertidal habitat creation for biodiversity and flood management benefits.
- Advise on the appropriateness of plans and designs.
- Advise where works to defences are likely to take place under the Thames Estuary Asset Management 2100 (TEAM2100) current programme of works.
- Provide a facilitation role to support the development of strategies and implementation of the approach (i.e. running of workshops to enable partners start thinking about this approach).
- Help to co-ordinate conversations between councils where their riverside visions meet.
- Support opportunities for partnership working to develop shared visions for the riverside with stakeholders such as; the Greater London Authority, local planning authorities and landowners.
- Share successes from elsewhere in the Estuary.

## What are the next steps?

To discuss further, please contact the Environment Agency's Thames Estuary 2100 team at [ThamesEstuary2100@environment-agency.gov.uk](mailto:ThamesEstuary2100@environment-agency.gov.uk).





## Appendix 1 – Food in the School Fringe Tends to be Purchased in Non-Hot Food Takeaway Properties

1. Research by Professor Jack Winkler (London Metropolitan University) into the 'school fringe' – found just 3/10 purchases by students in a 400m school fringe were made in A5 properties.<sup>7</sup>
2. 70% of purchases in the school fringe were made in non-fast food outlets, and the same research concluded 'the most popular shop near Urban was the supermarket, with more visits than all takeaways put together'.
3. Professor Winkler's findings are not an isolated case. A report by Public Health England and the LGA states that fast food school proximity restrictions do 'not address sweets and other high-calorie food that children can buy in shops near schools.'<sup>8</sup>
4. Research by Brighton and Hove found that 'Newsagents were the most popular premises [in the school fringe], with more pupils visiting newsagents than any A5 premises'.<sup>9</sup>
5. Likewise, research for the Food Standards Agency on purchasing habits in Scotland found that 'Supermarkets were the place that children reported they most frequently bought food or drinks from at lunchtime'.<sup>10</sup>
6. Indeed, there are several more researchers who have found no evidence to support the hypothesis that less exposure to fast food, or better access to supermarkets are related to higher diet quality or lower BMI in children. <sup>111213</sup>

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<sup>7</sup> The School Fringe: What Pupils Buy and Eat From Shops Surrounding Secondary Schools, July 2008, Sarah Sinclair and Professor J T Winkler, Nutrition Policy Unit of London Metropolitan University

<sup>8</sup> Public Health England & LGA, Healthy people, healthy places briefing: Obesity and the environment: regulating the growth of fast food outlets, page 5, November 2013

<sup>9</sup> Brighton & Hove City Council & NHS Sussex, Hot-food takeaways near schools; An impact study on takeaways near secondary schools in Brighton and Hove, page 28, September 2011

<sup>10</sup> Jennie Macdiarmid et al. Food Standards Agency. Survey of Diet Among Children in Scotland (2010) - [http://www.esds.ac.uk/doc/7200/mrdoc/pdf/7200\\_final\\_report\\_part\\_2.pdf](http://www.esds.ac.uk/doc/7200/mrdoc/pdf/7200_final_report_part_2.pdf)

<sup>11</sup> Forsyth, A., et al., Do adolescents who live or go to school near fast-food restaurants eat more frequently from fast-food restaurants? Health and Place,, 2012. 18(6): p. 1261-9.

<sup>12</sup> An, R. and R. Sturm, School and residential neighborhood food environment and diet among California youth. American Journal of Preventative Medicine, 2012. 42(2): p. 129-35.

<sup>13</sup> Timperio, A.F., et al., Children's takeaway and fast-food intakes: associations with the neighbourhood food environment. Public Health Nutrition,, 2009. 12(10): p. 1960-4.

## Appendix 2 – Food Purchases made on School Journeys

**Only a limited number of journeys to and from school involve a purchase at a food outlet.**

1. This has been confirmed in research by the Children's Food Trust, which found that only 8% of all journeys to and from school included a purchasing visit to a food outlet.<sup>14</sup>

Table 3. Total number of journeys including a food outlet visit					
	<i>n</i>	Number of journeys to school	Number of journeys from school	Total number of journeys	Percentage (%) of all journeys
Journeys including a visit to a food outlet		86	87	173	
Journeys including a purchase from a food outlet		11	6	17	10
		8	6	14	8

2. Of the food purchases made on school journeys, confectionary was the most popular item sold – which McDonald's does not offer on its menu.

3. Likewise, research by Ashelsha Datar concluded that children 'may not purchase significant amounts of junk food in school' – partly due to 'fewer discretionary resources to purchase them'.<sup>15</sup>

4. Indeed, even where purchases were made, 'children may not change their overall consumption of junk food because junk food purchased in school simply substitutes for junk food brought from home.'

5. Similarly, research by Fleischhacker highlighted the need for future school-based studies to 'gather information on whether or not the students attending the studied schools actually eat at the restaurants near their schools.'<sup>16</sup>

6. This was also highlighted in the systematic review by Oxford University, which states 'future work should also incorporate a child's usual mode of travel to and from school into decisions about appropriate buffer distances.' The review added that age should also be taken into consideration, as this can impact on travel time and the availability of pocket change.<sup>17</sup>

<sup>14</sup> Children's Food Trust – November 2011, page 1 [http://www.childrensfoodtrust.org.uk/assets/research-reports/journey\\_to\\_school\\_final\\_findings.pdf](http://www.childrensfoodtrust.org.uk/assets/research-reports/journey_to_school_final_findings.pdf)

<sup>15</sup> Ashelsha Datar & Nancy Nicosia, Junk Food in Schools and Childhood Obesity, page 12, May 2013

<sup>16</sup> S Fleischhacker et al. A systematic review of fast food access studies, page 9, 17th December 2009

<sup>17</sup> J Williams, P Scarborough, A Matthews, G Cowburn, C Foster, N Roberts and M Rayner, Nuffield Department of Population Health, University of Oxford, page 13-14, 11th December 2013. A systematic review of the influence of the retail food environment around schools on obesity-related outcomes.

4<sup>th</sup> January 2022

Simon McIntosh  
BMO Real Estate Partners

By e-mail: [smcintosh@bmorep.com](mailto:smcintosh@bmorep.com)

Dear Simon,

**RE: Onslow Hall, Richmond – Marketing update**



**brayfoxsmith.com**

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Prince Frederick House  
35-39 Maddox Street  
London W1S 2PP

Tel: 020 7629 5456  
Fax: 020 7491 4788

I refer to the above property and, as requested set out below a commentary on the Richmond office market as well as the building specifically.

### **Supply**

Richmond is a mature, established market with stock totalling approximately 980,000 sq ft. Supply levels currently are above the long-term average with a number of refurbished grade A quality offices coming on line currently.

Key current availability:

Building	Landlord / Developer	Size	Quoting Rent	Timing	Notes
Sovereign Gate, Kew Road	Watkin Jones	3,884 – 24,377	£52.50	Current	Newly refurbished former police station.
Holbrooke Studios, Hill Rise	CBRE Global Investors	9,819	£53.50	Current	Newly refurbished building on edge of town.
Evergreen Studios	Sheen Lane	3,294 – 13,960	£55.00	Current	Refurbished building, LG to 3 <sup>rd</sup> . Ground now let.
Greyfriars Studios	Sheen Lane	4,352 – 8,713	£55.00	Current	Refurbished space above retail opposite Station.
Ambassador House	Colliers Global Investors	6,492 – 23,288	£48.50	Current	3x refurbished floors
		<b>Total – 80,157</b>			

I would suggest that of these currently available options they are not comparable with Onslow Hall. They are all purpose built office buildings with raised floors and air conditioning.

### **Supply pipeline**

Richmond is currently facing a large influx of available office space which is going to result in stock levels in the town far higher than they have been in recent history. This will likely create challenging marketing conditions moving forwards.

Building	Landlord / Developer	Size	Quoting Rent	Timing	Notes
Frame Works	BBRE	2,023 – 19,970	NQ, likely late-£50's	Jan 22	Planning received for back to frame refurb. On site to deliver Jan 2022.
Eton House	Moorevale	45,000	TBC	2023	Extend and refurbishment
Palm Court, Richmond Riverside	OSIM	C17,000	NQ	TBC / likely late 2022 – early 2023	Will be refurbished once Unilever lease expires. Will be let to a single tenant.
19-22 The Quadrant	Kier	2,077 – 14,553	NQ	TBC	Refurbished / extended office space above Lloyds Bank. Planning received, no proposed commencement of works.
80 George Street	Canadian & Portland	42,000	NQ	TBC	Redevelopment of former Department Store. Planning received. Will not spec.

Of the above, only Palm Court is a self-contained, period style building Like Onslow Hall. The rest of the buildings are purpose built modern offices.

### Demand

The longer-term average take-up is c60,000 sq ft per annum however the last 5-year take-up average is low at 38,241 sq ft. There has historically been a flight to quality and that remains as important, if not more at present – with the best buildings securing the tenants.

I've appended a current schedule of enquiries of 2-12,000 sq ft for Richmond and although not exhaustive, provides a flavour.

Below is a table highlighting recent transactions:

Date	Property (Floor)	Tenant	Size	Term (break)	Rent (psf)	Notes	Condition
Sep 21	Holbrooke Studios (1 <sup>st</sup> )	Infinium Logistics	4,331	10 years (5)	£50.00	Grade A refurbished, secondary location	Grade A refurbished
Aug 21	Evergreen Studios (G)	Spoke London	3,363	5 years (3)	£55.00	Grade A refurbished	Grade A refurbished
Dec 20	25 Kew Foot Road (Entire)	Secretary of State	7,632	15 years (10)	£49.50	New build, Grade A but secondary location. Pre-let agreed in 2019.	New Grade A



Dec 20	1 Eton Street (2 <sup>nd</sup> )	Ecover	11,034	2 years	£45.00	Short-term letting on unrefurbished space.	Grade A unrefurbished
Mar 20	Heron House (Entire)	RM Sothebys	3,133	10 years (3 and 5)	£59.00	Full refurbishment of Grade II listed building overlooking the River as part of Richmond Riverside development	Sympathetic period refurbishment

### **The Property**

Focusing on Onslow Hall, I have been marketing office space in the building since October 2015 with some suites in the building having been available and actively marketed now for coming up to 3 years. During this period, to try and enhance the letting prospects, you funded significant fit out costs in order to be able to offer a fully fitted office suite at Onslow Hall. We are seeing more of this as Landlords try to secure new tenants for their vacant office space.

As I mentioned above it is important to remind ourselves that BMO have invested in Onslow Hall over the 6 or so years I have been working on the building and as a result have made it much more presentable to the market. As a recap significant cap ex works have been carried out to the externals, the internal common parts and offices suites as well as the installation of a new lift. That said it remains a Grade II listed property with all the limitations that brings including a small/ limited reception area, no comfort cooling or air conditioning and no raised floors. It is also important to note that the building is not DDA compliant and has compromised WC facilities which have all added to the challenges in finding tenants for the building. In our experience, the limited number of tenants out there taking space are much more discerning when leasing office space and look for more contemporary and sophisticated accommodation in order to be able to attract and retain their staff. Wellness and ESG matters are more often at the core of their decision making and sadly Onslow doesn't score highly on these matters

### **Marketing**

The marketing of the 2<sup>nd</sup> floor annex in Onslow Hall commenced in February 2019. Various other suites in the building have become available and have been marketed since.

We have carried out the following initiatives: -

- A 2-page brochure was produced incorporating Photography.
- The property is listed on agency websites  
The property is listed on various commercial web sites including Zoopla and Right Move, Estates Gazette Interactive, The Office Agents Society, Prime Location and Estate Agents Clearing House.
- Targeted mail out to local occupiers and business was undertaken
- Letting board attached to the railings outside the building
- As mentioned previously you have funded the fit out the suite to a high quality Category B as a 'show unit' to demonstrate to interested parties the potential environment they could

acquire. The fit out included high quality finishes to the floors, ceilings and kitchen and a range of furniture purchased including desks, chairs, storage, break out area chairs and sofas to show how the offices could work practically for office users.

### **Interest schedule**

Since February 2019 in excess of 20 viewings have been undertaken at the property and a number of proposals have been made.

We have regularly sent the property details to a variety of local occupiers and agents actively looking on behalf of clients. We are aware of ongoing requirements in the area, and we have been able to directly target those acquiring agents.

A schedule of enquiries is attached below. This is not exhaustive but is an indication of the calibre and type of occupier we have tried to attract. The property continues to be actively marketed.

Issues that have been sighted by parties include:

- Poor IT connectivity / lack of flexibility.
- Dated building appearance.
- Low office specification (no air condition or raised floors)
- Poor building access (building not DDA compliant)
- Poor Wellness and ESG credentials

Date	Potential Occupier	Reason for rejection
Feb 19	MJW Wealth	Appearance too grand for brand
March 19	SHB property advisors	Lack of expansion opportunity
March 19	Syslink	No feedback
May 19	Target Capital	Lack of flexibility and compliance issues
June 19	Mesa Financial consultants	Went to serviced offices
Aug 19	Glen cummings	Agent Led – no feedback offered
August 19	Corillian Energy	Office specification- no raised floors or air con
Sept 19	Elementary Brands	Compliance issues
Sept 19	Garner Hancock Solicitors	Location- Isleworth based
Sept 19	Braumlink	
Oct 19	Therme	Dated building image
Oct 19	In2impact	Dated building image
Feb 20	ISAAC	Covid
Dec 2021	Dr Bryany Branford (psychologist)	Poor DDA
Dec 2021	Braumlink	Connectivity/ IT requirements
Jan 2022	Barrister Richard	Limited budget

Jan 2022	Bent Agency	Access to the upper floors to awkward (large archives of books)
Jan 2022	Barrister Richard	Only need space for 4 people

Obviously, this is not a definitive list but clearly shows that there is a strong office market in Richmond, but applicants decided that Onslow Hall was just not suitable.

To reflect market conditions, you have also agreed to reduce your asking terms and to be more flexible on lease structure.

In more recent months Barclays have vacated the building and we now have their space to market in addition to the other suites. The issues that have arisen with trying to let the smaller suites is mirrored across the rest of the building. We have been marketing on the basis of both multilet or single tenant.

#### **Summary**

Having regard to the uncertain state of the office market today, the extensive marketing campaign referred to above, we consider it unlikely that an additional and extended marketing campaign will secure occupiers for these premises.

Perhaps we can convene a meeting to discuss our future working relationship.

Kind regards,

Yours sincerely,

Clare Lane  
Director  
[clarelane@brayfoxsmith.com](mailto:clarelane@brayfoxsmith.com)

Appendix 1. Current Richmond requirements:

**Richmond General Requirements Current 9/21**

Occupier	Size (sq ft)	Comment
Miramar	2-3,000	Based in serviced offices at present having vacated conventional space last year. Looking to return to conventional, had started making enquiries.
Harvey Nichols	10-15,000	Based on Chiswick High Road but have enquired on Richmond options – need access for deliveries. Lease event 2022.
Velocity Partners	4-5,000	Overflow requirement from their space at the Poppy Factory, Richmond.
Tech21	7,000	TMT occupier, currently working from home
Oryon Imaging	2-4,000	Private diagnostic imaging business. Have been out viewing in Richmond.
Zonin	3,000	Wine business based on Richmond Green. Expanding and looking for new premises. No moving to Battersea
Reed	3-4,000	Recruitment expansion due to contract, were close to agreeing terms on Sovereign Gate – requirement now pushed back by 6 months.
Metis Consulting	3-4,000	Viewing options, due to make a decision imminently on building.
Clorox	4,000	US company with Richmond office, viewed options and will take one of the existing stock options.
Bradford Exchange	4,000	Richmond occupier. Have sold their owner occupied building currently and are looking for a self-contained building with parking to lease.



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Drawing Title  
LGC Estate

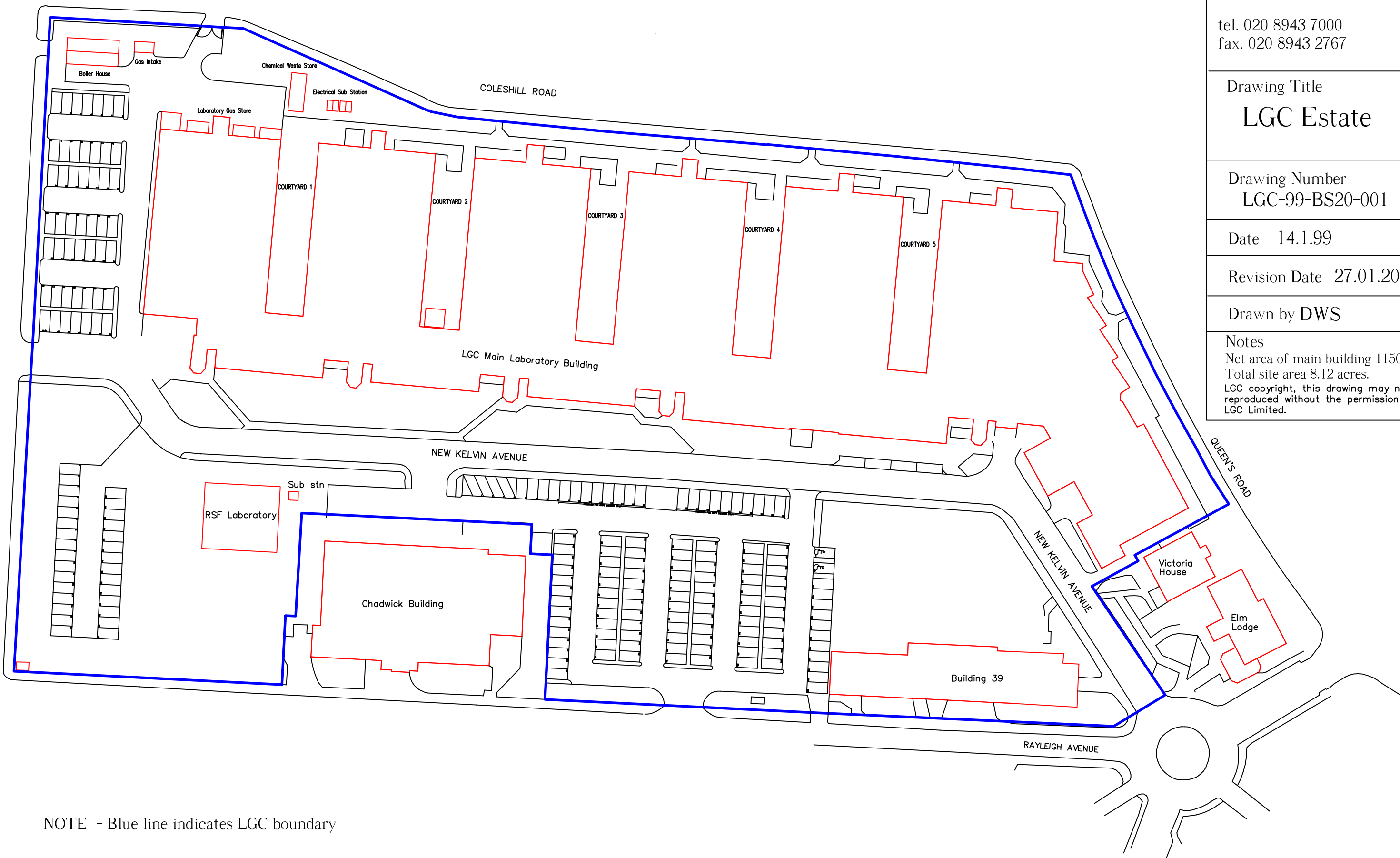
Drawing Number  
LGC-99-BS20-001

Date 14.1.99

Revision Date 27.01.2016

Drawn by DWS

Notes  
Net area of main building 11500 m2.  
Total site area 8.12 acres.  
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NOTE - Blue line indicates LGC boundary

(A)

Land Registry  
Official copy of  
title plan

Title number TGL394983  
Ordnance Survey map reference TQ1269SE  
Scale 1:1250  
Administrative area Richmond upon Thames



- My Land
- Post 1993 ADMIN boundary
- GB boundary (as 1991)
- GB extension 1996
- Reservoir Embankments

This plan is a copy of the original title plan and does not include the preceding title plan.

Appendix 1 –

Extract from MOL Land Review  
(2021) p.115-117



# Parcel: Kneller Chase Bridge

Number: 36    Area (ha): 18.69    Place: Whitton & Heathfield



Parcel map

**Legend**

MOL General Area



View facing north from B361 along the southern boundary, with views of open lawn and housing.



View facing north east from the southern boundary, with views into private gardens from the public highway of The Avenue.



View facing north from B361 along the southern boundary, with views of Kneller Hall grounds including open lawn, trees along boundaries and associated structures in the background.



## Boundary Assessment

### London Plan Boundary Criterion: 'Clearly, using physical features that are readily recognisable and likely to be permanent'

The western part of the parcel is bound by development on an Army Barracks. The western part of the parcel to the north is bound by regular backs of residential properties along Amberside Close, tennis courts. The Duke of Cambridge Close bounds the western part of the parcel to the east, Spray Lane bounds the westernmost part of the eastern part of the parcel. The Duke of Northumberland River bounds the parcel to the east with Whitton Dene and regular backs of residential properties bounding the eastern part of the parcel to the north along Queensbridge Park.

### Assessment of parcel against London Plan MOL criteria

#### MOL assessment summary

	Criterion 1	Criterion 2	Criterion 3	Criterion 4	Overall Rating
<b>MOL Parcel score</b>	<b>3</b>	<b>2</b>	<b>2</b>	<b>3</b>	<b>3</b>

\* Mostly inaccessible land and therefore assessment based on aerial photography and views from public highways.

### London Plan MOL Criterion 1: 'Contributes to the physical structure of London by being clearly distinguishable from the built-up area'

Built development is notable within the eastern of the parcel which contains Chase Bridge Primary School and hard standing to the east of the Duke of Northumberland River associated with Twickenham Stadium. Elsewhere a small number of minor buildings provide minimal urban influences.

Boundaries are mixed. A continuous tree line along northern and southern boundaries screen adjacent development well. The eastern edge is dominated by hard standing, with no identifiable boundary features and has open views of the directly adjacent Twickenham Stadium, resulting in no sense of openness. To the west the parcel is bound by multiple buildings with little screening, providing localised urbanising influences. Housing central but outside of the parcel (Duke of Cambridge Road), is has a mainly continuous tree line/ woodland on all sides, likely to screen the development on other areas of the parcel.

Open flat lawn with mature trees/ woodland along boundaries defines most of the parcel, with topographic change only at the Duke of Northumberland's River, therefore landscape structure is fairly weak. As built development is generally absent across most of the parcel, which is a fairly large open space contributing to separating the urban areas of Twickenham to the east and Whitton/ Hounslow to the west, it contributes to structure of London and therefore the parcel scores moderate (3) for criterion 1.

### London Plan MOL Criterion 2: 'Includes open-air facilities, especially for leisure, recreation, sport, the arts and cultural activities, which serve either the whole or significant parts of London'

The parcel provides school grounds for recreation and playing fields for local sports. The parcel also provides army barrack grounds and some playing facilities were visible based on views from a public highway. The path along the Duke of Northumberland's River provides the only publicly accessible part of the parcel, offering informal recreation. As the parcel provides local recreational and sport facilities, it scores weak-moderate (2) for criterion 2.

### London Plan MOL Criterion 3: 'Contains features or landscapes (historic, recreational, biodiversity) of either national or metropolitan value'

The river section of the parcel is designated as a SINC (borough) and OSNI including a valued green corridor at the Duke of Northumberland's River. It contains a small part of the signposted Duke's River Walk, a local recreational route. The western section lies within an Archaeological Priority Area. As the parcel has local historic, biodiversity and recreational value, it scores weak-moderate (2) for criterion 3.

**London Plan MOL Criterion 4: ‘Forms part of a strategic corridor, node or link in the network of green infrastructure and meets one of the above criteria’**

The parcel meets criterion 1. The fairly large green space and the Duke of Northumberland river corridor contribute to an important local wildlife corridor. It offers good connectivity north to south through two PRowS, including the signposted Duke's River Walk along the river, however the rest of the parcel is private therefore overall it has fragmented accessibility. Hard standing east of the river associated with Twickenham Station is likely to provide no wildlife value. As the parcel has fragmented access for people and is likely to provide a small contribution to a wildlife corridor along a local river, it scores moderate (3) for criterion 4.

**Conclusion**

**Overall comment**

Overall the parcel fulfils its role for MOL purposes, meeting criteria 1 and 4. However, the eastern edge of the parcel is developed and does not meet the MOL criteria.

**Strategy and Recommendations**

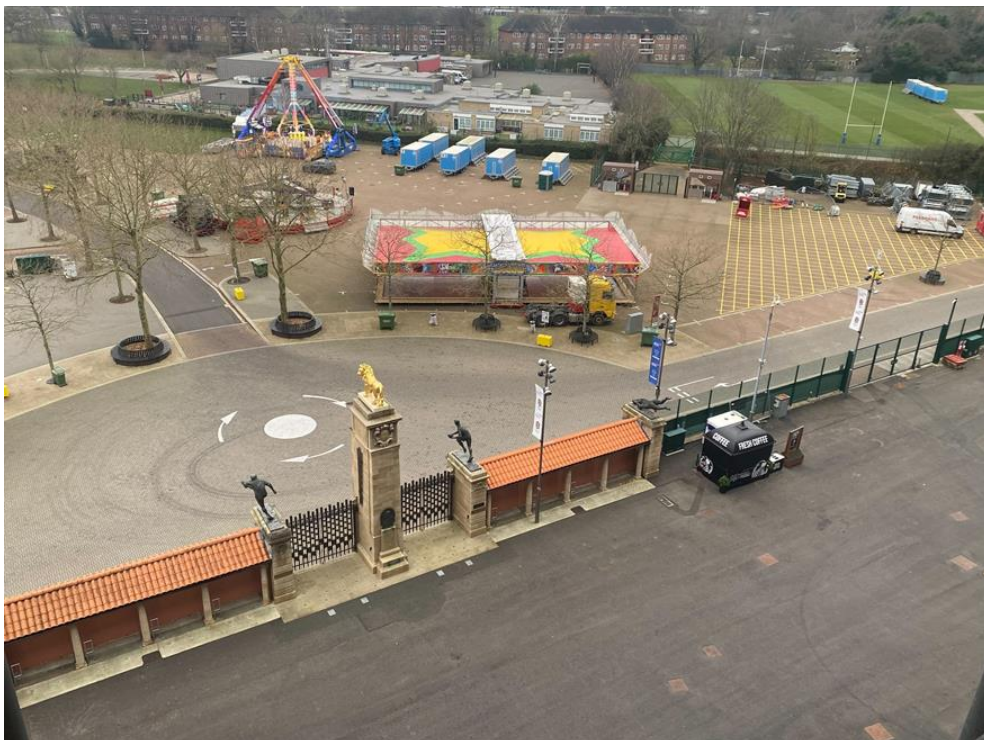
	Conserve	Enhance	Restore	Review	
--	----------	---------	---------	--------	--

The eastern edge of the parcel, hard standing associated with Twickenham Stadium, meets none of the MOL criteria and it is recommended that its MOL status is considered further.

## Appendix 2 – Photographs showing how eastern strip of MOL is used on Match Days & Location map



View 1A



View 2A





View 3A



View 4A





View 5A



View 6A





View 7A

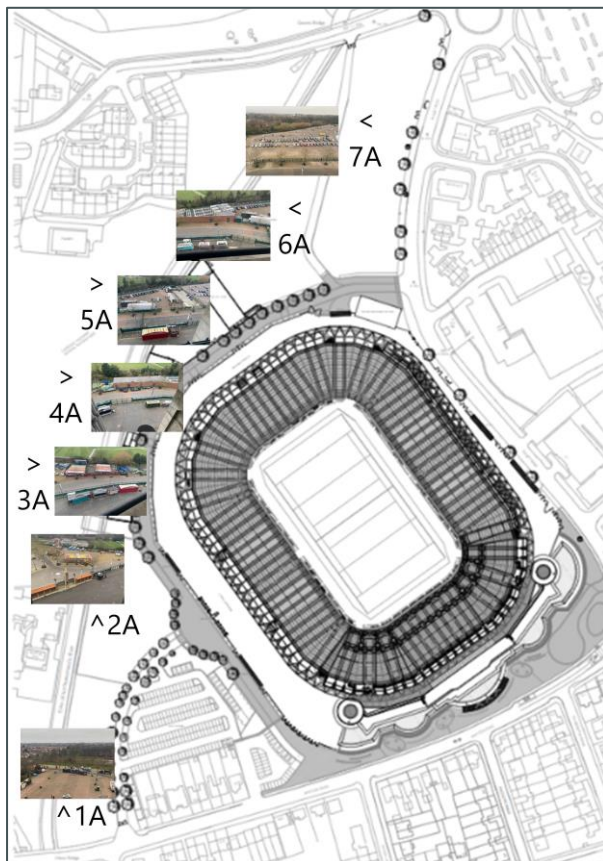


Photo location map (left) and MOL boundary (right)