

Review of Land Subject to Protective MOL and OOLTI Designation

London Borough of
Richmond Upon Thames

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On behalf of
**London Borough of
Richmond Upon Thames**

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1.0 INTRODUCTION

1.1 The London Borough of Richmond Upon Thames (hereafter called 'Richmond Borough') adopted the First Review of its Unitary Development Plan (UDP) on 1st March 2005. These policies will be saved for 3 years unless reviewed. Work has begun on producing a new Local Development Framework (LDF), due for adoption in 2008. As part of this process, Richmond Borough commissioned Allen Pyke Associates to undertake a review of policies and designated sites relating to land subject to protective designation in the Borough. This document sets out the results of this review.

2.0 METHODOLOGY

2.1 Richmond Borough provided a brief for the study, which required "*considering whether the existing UDP Review gives sufficient protection to established residential areas and in particular whether there are garden areas which should be subject to protective designations/general policies*". This study has specifically considered **Metropolitan Open Land (MOL)**, covered by UDP Policy ENV1, **Green Belt** areas, Policy ENV2, and **Other Open Land of Townscape Importance (OOLTI)**, Policy ENV3. **Green Chains**, Policy ENV6 has also been taken into consideration.

2.2 Allen Pyke Associates set out their proposed methodology for the study in their proposal to Richmond Borough. This was discussed with Council Officers and the detailed aspects of the work required were agreed. The first aspect of the study involved background research to review existing and emerging policies relating to Open Land within the study area. This was undertaken in order to gain an understanding of the Council's policies in relation to the review and to inform the assessment of potential designations. The documents consulted and the results of this review are set out in this report.

2.3 The second part of the study involved the review of existing designated sites and potential new sites. Richmond Borough indicated that it was unlikely to wish to de-designate areas. During a series of site visits, a number of existing OOLTI and MOL

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designated sites were visited in order to gain further understanding of the types and characters of areas currently designated and to inform the proposals for designation of new sites. The review of policy also assisted in informing the proposals for new sites.

- 2.4 In order to review potential new sites, the Council offices were visited and digital aerial photographs were viewed in order to identify potential sites for designation. This was discussed with Council Officers and certain sites omitted for reasons such as not meeting the criteria set out in the UDP Policies, sites have already been developed, or are allocated in the UDP. 88no. potential sites were identified and each was visited.
- 2.5 A site survey sheet was produced and agreed with Richmond Borough in order to systematically and consistently record the details of each site, and make recommendations for designation. The information recorded included site address, brief written description and justification, appropriate mapping and photographic record. A record was also made if the site is located within a Conservation Area or whether it is also designated as Green Chain as defined by the UDP.
- 2.6 This information was passed to Richmond Borough for discussion and selection of the most suitable sites to be proposed for designation. This list of sites will be submitted to Richmond Borough Cabinet for consideration for inclusion in the Local Development Framework. The completed survey sheets of the recommended sites are set out in Appendix B.

3.0 POLICY REVIEW

- 3.1 The following documents have been considered in the review of policies relating to Open Land within the study area:-
- Planning Policy Guidance Notes
 - PPG3 Housing
 - PPG9 Nature Conservation

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- PPG17 Sport and Recreation
- The London Plan, February 2004
 - Chapter 3 Thematic Policies
 - Accessible London: Achieving an inclusive environment, Supplementary Planning Guidance, April 2004
- London Borough of Richmond Upon Thames
 - Unitary Development Plan First Review, Adopted 1 March 2005

3.2 Planning Policy Guidance sets the overall framework within which the London Plan and Richmond Borough policies are formulated. PPG3 Housing sets out the importance of "Greening the Residential Environment" including the retention of trees and shrubs and protection and creation of open space and playing fields. It states that new housing in residential areas should not mean building on urban green spaces.

3.3 PPG9 Nature Conservation seeks to protect habitats, wildlife and natural features "as an important element of a clean and healthy natural environment". Attractive environments with nature conservation value, both within and beyond designated sites are cited as being essential to social and economic well-being.

3.4 PPG17 Sport and Recreation recognises the importance of a number of types of open spaces which includes amenity green spaces in and around housing and other areas, green corridors and natural and semi-natural urban green spaces, allotments, cemeteries and civic spaces which offer opportunities for recreation and can act as visual amenity. Further benefits of such spaces include the provision of "an outlook, variety in the urban scene, or as a positive element in the landscape."

3.5 The London Plan establishes the basis for improving London's open environment and protecting and promoting of the network of open spaces, both public and private. The associated benefits are given as "health, sport and recreation, children's play, regeneration, the economy, culture, biodiversity and the environment". Open space is considered to be "an integral part of the spatial

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character of the city”, having a “positive effect on the image and vitality of areas”.
Poor quality is not considered a reason to justify loss of open space.

- 3.6 The Richmond Borough policies relevant to this study are noted in section 2.1. These are set out in Chapter 5 of the UDP, 'The Open Environment', and are reiterated in Appendix A. The UDP recognises that parts of the Borough are deficient in open space at the local park level. Allen Pyke are in agreement with the current wording of the designation criteria with the following minor amendments.
- 3.7 With regard to the MOL designation criteria as set out in Policy ENV1, it is proposed that the term 'biodiversity' is added to references to 'nature conservation' in order to bring the terminology up to date with the latest guidance and policies.
- 3.8 With regard to Policy ENV3, OOLTI, it is recommended that the criteria for designation should also include significant areas of vegetation and mature trees which make a particular contribution to the distinctive character or structure of an area, or which enhance the character of an area which is otherwise lacking in vegetation.

4.0 CONCLUSIONS

- 4.1 This document has set out the process by which the London Borough of Richmond Upon Thames has reviewed UDP Policies ENV1 Metropolitan Open Land, ENV 2 Green Belt and ENV3 Other Open Land of Townscape Importance. This review process has identified and recommended new sites for designation under these policies.
- 4.2 Desk top survey work and site visits recorded through survey sheets has indicated that a potential 88no. new sites could be designated with approval from Richmond Borough Cabinet. On the basis of the designation criteria, 38no. sites were noted as 'Highly Recommended' for designation, while 50no. Sites were recorded for 'Possible Designation'.

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- 4.3 Designation of these sites would further increase the areas of protected open land, recreational spaces, visual amenity and the character of the Borough. This is in accordance with the Borough, London-wide and national policy and is of special importance in the areas of the Borough identified as being deficient in open space.

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Appendix A
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UDP Policies ENV 1, 2, 3 & 6

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UPD Policies ENV 1, 2, 3 & 6

ENV 1 METROPOLITAN OPEN LAND

5.24 The Council will protect and conserve metropolitan open land as defined on the proposals map by keeping it in predominantly open use. There will be a presumption against inappropriate development. Building development, including extensions, will generally be unacceptable. Changes of use of existing buildings for purposes not normally acceptable in metropolitan open land will be resisted. In considering development on sites adjoining metropolitan open land the Council will take into account any possible visual impact on the character of the open land.

5.25 Metropolitan open land is open land or water which is of significance to London as a whole or a part of London, either publicly or privately owned, and with or without public access, which either:

- a) contributes to the physical structure of London and helps to separate and/or define London's distinctive communities;
- b) contributes to the establishment of London's special character by providing attractive breaks in what would otherwise be continuous urban development;
- c) creates a significant visual open space experience when used, passed, or crossed;
- d) contains natural features, buildings or landscape of historic, recreational, agricultural, nature conservation or scientific interest, worthy of protection on account of their value nationally or to the whole or a part of London;
- e) includes open air facilities, especially for leisure, recreation and sport, of importance for the whole or a part of London;

or:

- f) forms part of a green chain of related open spaces and linking footpaths, bridleways, riverside and canal walks, and towpaths.

Some open spaces and gardens which themselves might not be of significance to London as a whole, but which combine visually and physically to form a larger significant open area or green wedge, are included.

5.26 The Council considers the contribution of metropolitan open land is as vital as green belt in defining London's structure. Therefore building development, including the extension of existing uses, will be vigorously resisted. The Borough's metropolitan open land is at present in a variety of uses ranging from the Royal Parks to schools, sports clubs and cemeteries. Envelopes to allow extensions have been provided around major buildings in metropolitan open land. However, the policy also recognises that there may be exceptional cases where it is appropriate to allow modest buildings or extensions, including structures on the river, which are related to the function of metropolitan open land and where this would not have a harmful effect on its character. So that it can be kept in predominantly open use, new uses will only be considered if they conserve and enhance the open nature and character of the metropolitan open land and maintain its nature conservation interest, are by their nature open or depend upon open uses for their enjoyment. Appropriate uses include:

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- a) public and private open space and playing fields;
- b) agriculture, woodland and orchards;
- c) golf courses;
- d) allotments, nursery gardens, private gardens;
- e) cemeteries;
- f) nature conservation;
- g) rivers, reservoirs, lakes and other open water.

5.27 The Council will protect metropolitan open land as a habitat for wildlife and take opportunities, where possible, to increase its potential for wildlife. Views across open land are important. The Council will encourage enhancement of metropolitan open land where appropriate, e.g. by landscaping, removal or replacement of inappropriate fencing, screening, and seek to reduce the visual impact of traffic and car parking.

ENV 2 GREEN BELT

5.28 The Council will protect and enhance the green belt as shown on the proposals map. There will be a general presumption against inappropriate development. New buildings proposed on land adjoining the green belt will be required to have minimum visual impact when viewed from the green belt.

5.29 The green belt within the Borough is shown on Map 2. The main purposes of the green belt are:

- To check the unrestricted sprawl of the built up area.
- To safeguard the surrounding countryside from further encroachment.
- To prevent Greater London from merging with neighbouring towns or urban areas, and to prevent neighbouring towns from merging into one another.
- To preserve the setting and special character of historic towns.
- To assist in urban regeneration by encouraging the recycling of derelict and other urban land.

5.30 Once green belts have been defined, the use of land in them should fulfil the following objectives:

- To provide access to open countryside and outdoor sport and recreational opportunities for the urban population
- To retain attractive landscapes, and enhance landscapes, near to where people live
- To improve damaged and derelict land around towns
- To secure nature conservation interest
- To retain land in agricultural, forestry and related uses

In relation to those uses identified above which are considered to be acceptable in the green belt, the Council will, in determining such applications, pay particular regard to ensuring that they protect and enhance the open nature and visual qualities of the green belt.

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- 5.31 The construction of new buildings within the green belt is inappropriate unless it is for the following purposes:
- (a) agriculture, horticulture and forestry
 - (b) essential facilities for outdoor sport and outdoor recreation, for cemeteries, and for other uses of land which preserve the openness of the green belt.
- 5.32 Approximately half of the Borough's green belt comprises operational waterworks, with most of the remainder in various open recreational uses. To ensure the green belt continues to fulfil its intended functions and to preserve its permanence it is essential that its open character and wildlife interest are maintained.
- 5.33 Degraded landscape quality arising from neglect or misuse of land will not be sufficient justification for allowing development contrary to green belt policy. In these circumstances the Council will endeavour to see the under-used land brought into an appropriate open use.
- 5.34 The Council will seek the co-operation of other landowners, including Thames Water, to enhance the quality of the green belt, for instance through landscaping schemes. Should waterworks land cease to be operational the Council will endeavour, in conjunction with the water authority, to bring such land into appropriate open recreational use allowing public access, while protecting and enhancing its potential as wildlife habitat.
- 5.35 (not relevant to this study)

ENV 3 OTHER OPEN LAND OF TOWNSCAPE IMPORTANCE

- 5.36 **Townscape importance. In considering development on sites adjoining these open areas the Council will take into account any possible visual impact on the character of the open land.**
- 5.37 In some parts of the Borough, open areas, which are not extensive enough to be defined as green belt or metropolitan open land, act as pockets of greenery of local rather than London-wide significance. Many of these are of townscape importance, contributing to the local character and are valued by residents as open spaces in the built up area. These areas include public and private sports grounds, some school playing fields, cemeteries, some large private gardens and some allotments, all of which the Secretary of State for the Environment has recognised can be of great importance to the character of a neighbourhood. LPAC through work on urban green space also recognises the importance of such land. The larger areas are shown on the proposals map but there will be other smaller areas which merit protection. The purpose of this policy is to safeguard open land and ensure that it is not lost to other uses without good cause. The policy recognises that there may be exceptional cases where it would be appropriate to allow modest buildings and extensions which are related to the function of Other Open Land of Townscape Importance (OOLTI) and when this would not have a harmful effect on its character.

ENV 6 GREEN CHAINS

- 5.44 **The Council, in conjunction with neighbouring Boroughs, will have regard to the importance of interconnected green space (or green chains) as a recreation and nature conservation resource, and as a link to the countryside. Priority will be given to proposals that will provide missing links, and enhance the value of green chains for informal recreation (particularly walking) and nature conservation. Proposals which would breach the green chains with built development will not be permitted.**
- 5.45 There is already a web of interconnected green spaces, (mainly existing open land protected by metropolitan open land, green belt, Area of Special Character, public open space and Other Open Land of Townscape Importance designations), carrying across Borough boundaries. These are referred to as "green chains" in the Strategic Planning Guidance for London (RPG 1996) which advises each Planning Authority to identify and make proposals for such spaces in their UDP. They provide both extended pathways for the public, and wildlife corridors in natural surroundings (these are also covered by policy ENV 20 below) see Map 2.
- 5.46 To encourage the use of such green chains, the Council will, when finances are available, establish a network of signposted and way marked walks in parts of the areas having public access, including links to town centres, public transport and other attractors. Where appropriate, provision may also be made for cycling and/or horse riding. Where there are missing links or urban sections between open areas, the Council will supplement planting on suitable routes, or acquire land, as resources permit, to complete chains. In liaison with other Boroughs and Authorities, the Council will publish maps and leaflets to explain routes, and publicise their existence.
- 5.47 The Council already promotes the Thames Path National Trail, the River Crane Walk and the Beverley Brook Walk. It is committed to developing sections of the two orbital walking routes around London, the Capital Ring and the London Loop, in conjunction with adjoining Boroughs and the London Walking Forum. See Map 3 for existing and proposed walking routes. Access to the River Thames is sought where there are new riverside developments. This policy links with policies ENV 28 and TRN 10 which encourage the establishment and use of footpath networks, relating to riverside access, and with the Councils transport strategy which seeks to encourage walking as an alternative to car use.
- 5.48 Proposed green chains are:-
- a) Hampton - the waterworks area stretching westward towards Kempton Park, eastwards to Bushy Park.
 - b) Teddington - Broom Road Recreation Ground, Lensbury Club, Riverside, links to Twickenham riverside; Normansfield links to Bushy Park via Bushy Park Road.
 - c) Ham - Thames Path, Ham Lands, riverside playing fields, Ham House Avenues, Greycourt School, Ham Common, Cassell Hospital north west boundary, links to Thames Path via path through housing estate (formerly British Aerospace, R.B. Kingston).
 - d) Richmond/Barnes - Richmond Park, Palewell Common, Barnes Common to River Thames, following Beverley Brook Walk, linking to Thames Path.

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- e) Richmond - Richmond Park to Wimbledon Common at Robin Hood Gate, Beverley Brook Walk and Capital Ring.
- f) Richmond/Kew/Mortlake - Old Deer Park, Kew Gardens, Kew and Mortlake riverside Mortlake Cemetery.
- g) Barnes - Lonsdale reservoir, Harrodian school, St Pauls School, Barn Elms Wildfowl and Wetland centre and sports grounds, Barnes Common.
- h) River Crane –
 - Crane Park, Kneller Park
 - Craneford Way playing fields to London Road.
 - Moormead Park to A316 and open land further north.