

All responses received on the Proposals Map Changes - Publication consultation - plus Officer responses (published 30 06 2017)

Comment ID	Representor ID	Respondent name	Part of Local Plan responding to	Soundness - Legally Compliant	Soundness - Sound	Soundness - Complies with the Duty to Cooperate	Reason Consider Unsound - Positively Prepared	Reason Consider Unsound - Justified	Reason Consider Unsound - Effective	Reason Consider Unsound - Consistent with national policy	Details of reason(s) for representation	Change(s) consider necessary	Officer response
1	244	Jon Rowles	Other: Omission	No	No	Yes					The council is heavily involved in the development of Metropolitan Open Land at Bridge Farm Nursery, Hospital Bridge Road, Whitton. Recent Freedom of Information requests show that senior officers from Richmond Council have been negotiating the owners Hounslow Council (who have owned the site for decades as a site to expand Hounslow Borough Cemetery) on behalf of the Education Funding Agency. As they wish to see the Turing House School built on the site. Head of terms have been agreed and its all but a done-deal in terms of everyone involved, with architects already engaged drawing up plans. I believe the council are trying to re-designate that land via the planning committee and not through the local plan process - as they don't want the Government Inspector to be involved.	I feel the council need to include the proposals for the development of the Hospital Bridge Road site in the plan.	Comments noted. No changes required. The Local Plan's Spatial Strategy places great emphasis on the protection of the parks and open spaces. There is a presumption against the loss of, or building on, greenfield sites as well as MOL/Green Belt in this borough, unless 'very special circumstances' and/or an exception to relevant policies can be demonstrated as part of a planning application. As the Borough can meet its housing target without releasing open land that is protected by designations such as Green Belt or MOL, a borough-wide Green Belt or MOL review has not been undertaken as part of this Local Plan. Also note that the Mayor of London does not support any MOL or Green Belt boundary releases. Turing House School is already an established school in the borough. It is acknowledged that the school is currently in temporary accommodation. If a proposal for a school comes forward on the Bridge Farm Nursery site, which is designated MOL, it will need to be assessed against all the policies set out within the Local Plan as well as the London Plan and NPPF, including policies on Green Belt and Metropolitan Open Land. It is therefore considered that this is not a Local Plan matter, but that it will be for the developer/applicant to demonstrate as part of the planning application process that 'very special circumstances' exist that may outweigh harm to Green Belt / MOL.

85	202	Peter Willan, <b>Old Deer Park Working Group</b>	Other: Omission THE ABSENCE OF A PROPOSALS MAP (References 29 and 113)	No																				
											<b>THE REPRESENTATIONS OF THE OLD DEER PARK WORKING GROUP, FEBRUARY, 2017</b>													
											<b>INTRODUCTION</b>													
											<p>The representations set out below follow the formal responses made by the Old Deer Park Working Group to consultation on the <i>The Richmond-upon-Thames Local Plan Pre-publication version of the Site Allocations Plan</i> and <i>The Richmond-upon-Thames Local Plan Pre-publication version of the Site Allocations Plan – New additional Sites</i> submitted in October/November, 2013 and June/July, 2014, and to consultation on <i>The First Draft of the London Borough of Richmond-upon-Thames Local Plan (pre-publication version)</i> submitted in August, 2016. Given the continuing relevance of the Group’s earlier formal responses, the Group is entirely willing to provide the Council with further copies of these formal submissions if required. <i>Summaries of the Group’s responses are set out in the Council’s Summaries of responses received in relation to the Local Plan policies and site allocations and Council’s response</i>, references 29, 113, 118, 159, 168, 448, 451 and 481.</p>	<p>Given the fundamental significance of the <i>Proposals Map</i> in securing a sound understanding and appreciation of the policies and site-specific proposals set out in the Final Version of the <i>Local Plan</i> and their potential application, the Group remains of the view that the <i>Proposals Map</i> should be subject to the same consultation and scrutiny as the Local Plan and that such a process should be carried out as an integral part of the consultation and scrutiny of the <i>Local Plan</i>.</p>	<p>Comments noted. No changes required. As stated within the Proposals Map Changes document, which was subject to public consultation as part of the Regulation 19 (Publication) consultation, the existing Proposals Map (2015) will be retained unless indicated otherwise. The Proposals Map Changes document clearly sets out any changes proposed by the Council to the Proposals Map. It should be noted that the Proposals Map illustrates the policies and proposals contained within the Local Plan and therefore it should be seen as integral to the Local Plan.</p>											
											<p>The representations take account of the formal advice on ‘soundness’ as explained in paragraph 182 of the <i>National Planning Policy Framework</i>.</p>													
											<b>THE ABSENCE OF A PROPOSALS MAP (References 29 and 113)</b>													
											<p>The Group notes that a note has been added to the present document advising that ‘The existing Proposals Map (2015) and its designations will be retained unless indicated otherwise within this document. In addition, the site-specific allocations as set out within this Plan will also be incorporated into the Council’s final version of the Proposals Map’. Regrettably no such advice was provided in relation to the earlier <i>First Draft of the Local Plan</i> – thus the earlier concern expressed by the Group regarding the absence of a draft <i>Proposals Map</i>.</p>													

86	202	Peter Willan, <b>Old Deer Park Working Group</b>	Other: Omission THE BOUNDARIES OF METROPOLITAN OPEN LAND, PUBLIC OPEN SPACE AND RICHMOND TOWN CENTRE (REFERENCE 481)		No					<b>THE BOUNDARIES OF METROPOLITAN OPEN LAND, PUBLIC OPEN SPACE AND RICHMOND TOWN CENTRE (REFERENCE 481)</b>  The Group notes with considerable regret the continuing resistance of the Council to address the significant anomalies in the boundaries of Metropolitan Open Land, Public Open Space and Richmond Town Centre insofar as they relate to the Old Deer Park as shown on the current and earlier <i>Proposals Maps</i> . The Group does not accept the reasons stated by the Council for rejecting, once again, the need to address these significant anomalies and believes that the present definition of the boundaries remains entirely unsound.		Comments noted. No changes required. The changes to the boundaries as suggested by the Old Deer Park Working Group have been considered relatively recently through development of the Development Management Plan (DMP). There has been no material change of circumstances since the DMP was adopted and therefore there is no justification to support changes at this point in time.
82	105	Helena Taylor, Lichfields on behalf of The <b>Harrodian School</b>	Metropolitan Open Land – Harrodian School Policy: 2.2.1	Yes	Yes	Yes				<b>Background</b>  We previously submitted representations to the Site Allocation Plan Pre- Publication consultation (November 2013) identifying the need for a change to the Metropolitan Open Land (MOL) boundary. Following this, we submitted representations to the Site Allocation New Additional Sites Consultation (June 2014) which supported the alteration of the MOL boundary at the School to remove the south west corner from the MOL designation. The Council then decided to stop progress of the Site Allocations Plan and instead commence a Local Plan Review.  We submitted representations to the Local Plan Review consultation document (December 2015) which continued to support the proposed alteration of the MOL boundary. Most recently, we submitted representations to the Local Plan Pre-publication Version (July 2016) reiterating support for the proposed alteration of the MOL boundary and commenting on draft Policy LP29 (Education and Training).  We set out in our representations to the Site Allocations Plan - Pre-Publication Stage consultation (12 November 2013) the policy position, local context and reasoning why the removal of the south west corner of the School Site from the MOL boundary represents a reasonable and balanced application of policy at all levels which relates to protecting MOL and providing for future education needs and would result in a sound policy. We do not repeat this evidence here.  The removal of the south west corner of the School site from the MOL boundary continues to be	The Harrodian School continues to support both the proposed alteration of the MOL boundary in the Local Plan Proposals Map Change document and draft Local Plan Policy LP29 (Education and Training). Policy LP29 and the Local Plan Proposals Map Change are both positively prepared, justified, effective and consistent with national policy, and are therefore sound.	Support welcomed. No changes required.

										supported by the School. The current MOL policy designation of the entire School site places a significant constraint on the School and its ability to provide for the needs of the community it serves, and the removal of this section of the site from the MOL designation seeks to fairly balance the future needs of the School with its existing designation within MOL (in accordance with equal NPPF policy weighting). The proposed alteration to the MOL boundary at the School site will result in the School being able to provide for the needs of its children throughout the course of their schooling. The School is a major employer in Barnes and plays an active role in the wider community. We welcome the planning policy commitment to serve and support the school and balance its needs against wider planning policy objectives, as this change will allow. The proposed Local Plan Proposals Map Change is positively prepared, justified, effective and consistent with national policy and is therefore sound. The School supports this change.		
83	206	Richard Boother, RPS on behalf of Mr S Oxley	Other: Omission Remove 32 Clare Lawn Avenue from MOL. LP13	Yes	No	Yes	Yes	Yes	Yes	<p><b>(See Appendix (14) to this document)</b></p> <p>RPS has been instructed by Mr. S. Oxley to <b>object</b> to the continuing designation of land at 32 Clare Lawn Avenue as Metropolitan Open Land (MOL). RPS has previously made representations on behalf of Mr. Oxley on the Site Allocations Plan Pre-publication version for consultation, and more recently on the Local Plan Review Scoping Consultation in February 2016 (Respondent Reference No. 50). In making these representations, I have had regard to:</p> <ul style="list-style-type: none"> <li>• National Planning Policy Framework, March 2012</li> <li>• London Plan, March 2016</li> <li>• Local Plan Review scoping consultation responses and officers comments, June 2016</li> <li>• London Borough of Richmond upon Thames Local Plan Publication version for consultation, January 2017</li> <li>• London Borough of Richmond upon Thames Open Space Assessment Report April 2015</li> <li>• Open Land Review 2006</li> <li>• London Borough of Richmond upon Thames Infrastructure Delivery Plan 2012</li> <li>• Annual Monitoring Report 2014/15</li> </ul> <p>RPS has previously welcomed the consolidation of the Borough's planning policies into a single document. By the time the Local plan is adopted, a</p>	<p><u>Reasons for removing site from MOL</u> Given the purposes of including land within the Green Belt, and the historic functions of MOL as set out in the GLDP and RPG3, it is curious that the appeal site was designated part of the MOL in the first place, and that the designation has survived subsequent reviews (most recently in 2006 before Mr Oxley purchased the property). For the curtilage of a residential property in the built up area to be within the MOL is unique and could in this context be said to be 'exceptional'. The site is clearly distinct from Richmond Park to the south which acts as the check to unrestricted urban sprawl into open countryside. Because of the size of the site, its removal from the MOL will not make it more likely the existing built up area of East Sheen will sprawl further to the south and coalesce with other neighbouring urban areas. The wall along the southern boundary is a perfectly defensible boundary against such scenarios. The site does not preserve the setting and special character of an historic town, and its</p>	<p>Comments noted. No change. The Local Plan's Spatial Strategy states that the borough's parks and open spaces provide a green lung for south/west London. In addition, there is a presumption against the loss of, or building on, greenfield sites as well as MOL/Green Belt in this borough, unless very special circumstances and/or an exception to relevant policies can be demonstrated. In addition, the Plan demonstrates that the Borough can meet its housing needs without releasing open land that is protected by designations such as Green Belt or MOL. Therefore, a borough-wide Green Belt or MOL review has not been undertaken as part of this Local Plan. Whilst the reasons and justification brought forward by the respondent to review the MOL boundary at 32 Clare Lawn Avenue are noted, as stated above, MOL boundaries are not being reviewed as part of this Local Plan. It is also noted that this site already benefits from planning permission and as such, this clearly demonstrates that the MOL policy allows for exceptions and/or very exceptional circumstances to be met where those are put forward by the applicant. The Council is also of the opinion that the granting of planning permission is not a trigger for a need to review the MOL boundary. In addition, national guidance on Green Belt states that Green Belt</p>

						<p>considerable amount of time will have elapsed since the Core Strategy and Development Management Policies were adopted and material circumstances relating to specific sites within the Borough and the development needs of the Borough's residents will have changed. The review has therefore been a timely opportunity to ensure that the Local Plan not only supports the strategic development needs of Richmond, but also plans positively to support local development.</p> <p><u>Site Location</u> The site the subject of these representations, (as shown on the accompanying Site Location Plan) is situated at the southern edge of the built up area of East Sheen, immediately adjacent to the northern end of Richmond Park, 2.7km to the east of Richmond Town Centre. The site has an area of approximately 1.05ha and is accessed via a narrow drive from the south of Clare Lawn Avenue. The site is adjoined by medium to low density residential properties fronting Clare Lawn Avenue and Parkgate Gardens. Given its residential use, the site shares the suburban character and appearance of these adjoining properties, as opposed to the wide open space of the Park to the south.</p> <p><u>Planning History and Background</u> The term 'Metropolitan Open Land' was created in the 1960's by the former Greater London Council (GLC), and applied to Sir Patrick Abercrombie's 'Green Wedges' and other areas of strategic open space in London. The term was introduced as part of the preparation of the Greater London Development Plan (GLDP), which post-dates the erection of the previous building on site. Its stated purpose was to define open space which is of significance for Greater London as a whole. It included open land of considerable diversity, ranging from Central London's Royal Parks to common land and wider undeveloped areas bordering the Green Belt. The GLC, at the time, described the MOL as land forming islands in the urban fabric or penetrating deeply into the urban fabric in the form of wedges, and was viewed as providing "useful and attractive breaks in the built up area relieving the monotony of an otherwise continuous development". The MOL concept was carried forward into Regional Planning Guidance RPG3 (Strategic Guidance for</p>	<p>on-going designation as MOL would in no way because of its size, encourage the recycling of derelict or other urban land. The site in itself does not provide a clear break in the urban fabric. Indeed, it is RPS' view that the site is an integral part of the urban fabric. This particular function is instead performed by Richmond Park, which draws visitors from across London as a whole. The site in itself does not materially contribute to the green character of London. What limited contribution it does make is hardly of strategic significance, and it could be argued that much of the low density housing surrounding the site, which is not MOL, makes a similar contribution. The site is in private ownership, and has been certainly since the evolution of MOL as a concept, and so serves no purpose in servicing the needs of Londoners. The site does not contain any features of landscape of national or regional significance, and does not form part of a Green Chain or link in the network of green infrastructure, which meets any of the above criteria. Certainly, the site does not conform to any of the criteria used to assess land for inclusion within the MOL as set out in London Plan policy 7.17. In allowing the recent appeal for a substantially larger building on the site, the Planning Inspector considered the characteristics of the site very carefully. He noted in paragraph 14 of his decision letter that: <b>"The site comprises a large residential curtilage within a low density suburban townscape, rather than a location with a semi-rural character."</b> This is a more up to date assessment of the character of the site than the assessment by the Inspector at the UDP Public Inquiry in 2001 referred by the Councils in its comments on the</p>	<p>boundaries [and MOL] should only be altered in exceptional circumstances. It is noted that a Planning Inspector recently considered a planning appeal and that a larger building on the site was allowed. However, the Inspector's remit was to assess the proposal subject to the appeal and not whether the site meets the MOL criteria.  With respect to the specific comments provided against the MOL London Plan criteria, it should be noted that this area has been designated as MOL since 1985. The issue of whether this was an appropriate designation was considered at the UDP Public Inquiry in 2001. The Inspectors Report (August 2001, para 5.69) concluded that the designation was appropriate as although the site cannot be readily seen from adjoining land, its character and appearance relate more closely to Palewell Common and Richmond Park. The site forms part of the large swathe of MOL to the east and south and its open character contribute towards the separation of East Sheen from Roehampton. Since 2001 the NPPF was published in 2012 and the London Plan in 2011, the Council sets out a reassessment of this site against these policies below. It is evident that this site and the overall area fulfil at least 3 out of 4 criteria for designating MOL as defined within the London Plan. Taking these criteria in turn: a) With the exception of the part of the site where the new dwelling has been erected, the whole site contributes to the physical structure of London by being distinguishable from the built up area. A large part of the site, particularly the western side, is open and therefore not part of the built up area. The site provides a distinct break from the more prevalent urban fabric of the built up area to the north. In relation to the strategic and wider MOL area, this is of significance to London as a whole or in part, by providing an attractive break in what could otherwise be a continuous urban development. Therefore, it fulfils criterion 1 of the London Plan policy as this site is 'clearly distinguishable' as a break in the prevailing urban fabric elsewhere in the area, particularly to the north. Whether or not there is public access to this site is not part of the MOL criteria for designation. b) It is acknowledged that the site does not</p>
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									<p>London) adopted in 1996. Paragraph 7.7 of RPG3 stated:  <b>“MOL has been recognised as land of predominantly open character which has more than Borough significance, generally because of its size and catchment area. The main criteria for MOL designation are:</b></p> <ul style="list-style-type: none"> <li>• Land which contributes to the physical structure of London by being clearly distinguishable from the built up area.</li> <li>• Land which includes open air facilities, especially for leisure, recreation, sport, arts and cultural activities and tourism which serve the whole of significant parts of London.</li> <li>• Land which contains features or landscape of historic , recreational, nature conservation or habitat interest , of value at a metropolitan or national level.”</li> </ul> <p>Paragraph 7.9 stated that “if the land does not serve a catchment area of strategic significance or draw visitors from several Boroughs, it may be more appropriate to propose and justify other local designations”.</p> <p>Planning consent was granted for a large detached dwelling towards the eastern end of the site in the 1950’s. Planning consent was first obtained for a replacement dwelling on the site in 1998 (98/1843 refers), and the application was renewed in 2005 (04/3158/FUL) and again in 2010 (09/0663/FUL). In 2012, planning consent was granted on appeal for the demolition of the existing dwelling and ancillary buildings and the erection of a new larger two storey dwelling with basement (11/1473/FUL and APP/L5810/A/11/2161139 refer)(appeal decision attached). The previous dwelling has now been demolished and the new dwelling has been erected and is now occupied.</p> <p>The site is currently designated as Metropolitan Open Land and is covered by Policy LP 13 Green Belt, MOL and Local Green Spaces.</p> <p><u>Planning Policy Context</u>  <i>National Planning Policy Framework (NPPF)</i>  The previous policy guidance of PPG2 on Green Belts applied equally to MOL (as noted in the Revised Early Minor Alterations to the London Plan published 11th October 2013). PPG2 has now been superseded by paragraphs 79-92 of the NPPF. Paragraph 80 sets out the five purposes of the Green Belt (MOL):</p> <ul style="list-style-type: none"> <li>• to check the unrestricted sprawl of large built-up</li> </ul>	<p>responses to the Local Plan Review Scoping Consultation.</p> <p>The site is clearly an integral part of the built up area, quite distinct from the wide open space of Richmond Park, and the transition between the two is very clearly marked by the intervening boundary wall. The site is not distinguishable from the built-up and thus fails criterion a of London Plan Policy 7.17. The site does not include any open air facilities serving whole or significant parts of London, and so conflicts with criterion b. The Council in its responses to RPS’ representations on the Local Plan Review Scoping Consultation acknowledges that the site does not meet this criterion. The site does not contain any features or landscape of national or metropolitan value, thus failing to meet criterion c. By not satisfying criteria a-c, the site cannot fulfil the requirements of criterion d. As a large site within the built-up area, the site offers a sustainable location for future development.</p> <p>To this end, RPS considers that the continued designation of the site at 32 Clare Lawn Avenue is not justified and is contrary to national planning guidance and development plan policy in that it does not serve any of the purposes of Metropolitan Open Land. This in turn means that the Council has failed to plan positively for the development needs of the Borough. RPS therefore consider that the Proposals Map should be amended to take the site at 32 Clare Lawn Avenue out of the MOL designation.</p>	<p>contain any open air facilities which serve the whole or significant parts of London and therefore does not meet this criterion.</p> <p>c) The site itself and in particular the overall area contain features or landscapes (historic, recreational, biodiversity) of either national or metropolitan value. The site has a largely open character and provides an important link and habitat by being situated adjacent to Richmond Park, which is SSSI, National Nature Reserve and SAC, as well as nearby Palewell Common, which is designated OSNI.</p> <p>d) It is evident that this site forms a link in the network of green infrastructure and meets one of the above criteria – it provides a link or stepping stone and by virtue of its location with Palewell Common to the east and Richmond Park to the south, it is considered of having great importance to the local as well as wider green infrastructure network.</p> <p>The Council's position is therefore that this piece of land is appropriately designated as it fulfils the required criteria within the London Plan MOL policy.</p> <p>The respondent does not indicate a desire for developing the western part of the land that currently has no buildings or structures. Therefore, should any further proposals for the site come forward, they can be assessed in line with MOL policies.</p>				

areas;

- to prevent neighbouring towns merging into one another;
- to assist in safeguarding the countryside from encroachment;
- to preserve the setting and special character of historic towns; and,
- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

Paragraph 84 states that when drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development, and should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary.

*The London Plan*

The London Plan now provides the strategic planning guidance for London and contains a policy relating to MOL (policy 7.17). This states that any alterations to the boundary of MOL should be undertaken by boroughs through the LDF process, in consultation with the Mayor and adjoining authorities. To designate land as MOL, boroughs need to establish that the land meets at least one of the following criteria:

- a) it contributes to the physical structure of London by being clearly distinguishable from the built up area;
- b) it includes open air facilities, especially for leisure, recreation, sport, the arts and cultural activities, which serve either the whole or significant parts of London;
- c) it contains features or landscapes (historic, recreational, biodiversity) of either national or metropolitan value;
- d) it forms part of a Green Chain or a link in the network of green infrastructure and meets one of the above criteria.

The previous version of the London Plan set out three valuable functions performed by MOL which were broadly the same as those set out in RPG3.

These were:

- protecting open space to provide a clear break in the urban fabric and contributing to the green character of London;
- protecting open space to serve the needs of Londoners outside their local area; and,
- protecting open space that contains a feature or landscape of national or regional significance.

87	274	Judith Livesey, Nathaniel Lichfield & Partners on behalf of St Paul's School	Page: 3 Other: Omission of amendment to Metropolitan Open Land boundary at St Paul's School to remove areas of developed land to the west of St Paul's School that does not fulfill MOL functions.	No		Yes	Yes		Yes	<b>See Publication Local Plan Comment ID 331</b>	Amendment of MOL Boundaries at SPS The MOL boundary at SPS should be amended and a new section added to the Publication Version Proposals Map Changes to de-designate the three areas of land to the south and west of the main school buildings, as shown on the plan provided in Appendix 4. In doing so, the Council would be taking a positive and proactive approach to assist the operations of an important educational institution, meeting the requirements of NPPF paragraph 72, 83 and 85 and ensuring the accuracy of Local Plan paragraph 5.2.2. For the areas identified, exceptional circumstances required by paragraph 83 of the NPPF exist by virtue of the existing site conditions that clearly do not meet the MOL criteria and the extant planning permission for additional development in MOL. Regularising the boundary would enable a clearer permanent boundary to be defined that will endure beyond the plan period in accordance with paragraphs 83 and 85 of the NPPF. Making this change would resolve the Schools concerns about the soundness of the plan in relation to the MOL boundary at its site.  <b>See also Publication Local Plan Comment, Objective ID: 331</b>  <b>See Appendix (23) to this document</b>	Comments noted. No change. The Local Plan's Spatial Strategy states that the borough's parks and open spaces provide a green lung for south/west London. In addition, there is a presumption against the loss of, or building on, greenfield sites as well as MOL/Green Belt in this borough, unless very special circumstances and/or an exception to relevant policies can be demonstrated. In addition, the Plan demonstrates that the Borough can meet its housing needs without releasing open land that is protected by designations such as Green Belt or MOL. Therefore, a borough-wide Green Belt or MOL review has not been undertaken as part of this Local Plan. Whilst the reasons and justification brought forward by the respondent to review the MOL boundary at St Paul's School are noted, as stated above, MOL boundaries are not being reviewed as part of this Local Plan. It is also noted that the school already benefits from various planning permissions and as such, this clearly demonstrates that the MOL policy allows for very exceptional circumstances to be met where those are put forward by the applicant. The Council is also of the opinion that the granting of planning permission under very exceptional circumstances in MOL is not a trigger for a need to review the MOL boundary. In addition, national guidance on Green Belt states that Green Belt boundaries [and MOL] should only be altered in exceptional circumstances.
2	33	Stephanie Brooksbank	Local Green Space - Udney Park Playing Fields, Teddington Other: Map and designation changes	Yes	Yes	Yes				<b>Entry left blank</b>		Support welcomed. No changes required.



4	24	Margaret Beasley	Local Green Space - Udney Park Playing Fields, Teddington Proposals Map Changes: Page number(s): 3 & 4 Other: Chapter 12 and Ref. 475	No	Yes	<p>I do not support the changes to the Local Plan policy whereby the land at Udney Park Road is to be designated Local Green Space. My reasoning is that this will in all likelihood result in the unintended consequence of preventing public access to and use of this land. The proposal by Quantum Group to build much needed Retirement and Continuing Care accommodation and the opportunity for a General Practice hard pressed for space in their current premises to relocate to larger premises, while offering the majority of the site owned by Quantum for sport, recreation and community use seems to offer a WIN-WIN solution. I strongly support Quantum" approach. It is a requirement that application for Local Green Space designation be made by the community. Use of the term "Local Green Space" is somewhat duplicitous. On first learning of this I thought "Great, a public amenity for all to walk through and enjoy sporting activities on." How wrong I was! I now realise that it offers anything but a space for the general public to enjoy. I have lived in Teddington since 1967 and our children attended local schools. Nevertheless, I was not consulted on this application. We have never had public, accessible to all, sports pitches on this site. This land has always been underutilised No one in my family has been able to set foot on this land apart from on just one occasion when we attended a Macmillan Cancer Care fund-raising event. The groups that made this application are not representative of the whole community and most definitely do not represent my views. I consider the Local Green Space option offers a LOSE-LOSE solution for all but the lucky few whose houses would overlook a privately owned, underused enclosure.</p>	<p>Udney Park Playing Fields (NOT the correct name for the site) should be removed from the proposals map as a site that should be designated as Local Green Space. The majority of people who live and/or work or attend local schools in Teddington would be kept out if Local Green Space designation came into place. Tthe site would be a private enclosure for the privileged few. The owners of this land are not obliged to open it up to the public. Wholesale development of the site would be bad but the new allocation proposed by the current owners in the last round of representations will give us what we want (Reference 475), delivering real social benefit, a secure future for the site and opening it up for everyone.</p>	<p>Comments noted. No changes required. As part of the Pre-Publication consultation, an application from a local community group has been received by the Council for the designation of Udney Park Playing Fields as Local Green Space designation. Public consultation on the proposed Local Green Space designation was carried out by the Council as part of the Regulation 19 consultation earlier in 2017. In line with paragraph 76 of the NPPF, "local communities through local and neighbourhood plans should be able to identify for special protection green areas of particular importance to them. By designating land as Local Green Space local communities will be able to rule out new development other than in very special circumstances." In addition, it states that "Local Green Spaces should only be designated when a plan is prepared or reviewed, and be capable of enduring beyond the end of the plan period." Therefore, the proper processes for applying for a Local Green Space designation and consulting on it have been followed. Paragraph 77 of the NPPF sets out that "the designation should only be used:</p> <ul style="list-style-type: none"> <li>• where the green space is in reasonably close proximity to the community it serves;</li> <li>• where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and</li> <li>• where the green area concerned is local in character and is not an extensive tract of land."</li> </ul> <p>In considering the application for this Local Green Space designation, the Council included policy criteria (in paragraph 5.2.10 of the Local Plan) in line with the NPPF within Policy LP 13 (Green Belt and Metropolitan Open Land). Taking each of these criteria in turn:</p> <ul style="list-style-type: none"> <li>• The site is submitted by the local community - this criterion is considered to be met as the application has been submitted on behalf of both the Teddington Society as well as the Friends of Udney Park Playing Fields. The Council notes that the Friends of Udney Park Playing Fields, at the time of the application, has circa 300 households as registered supporters, whereas the Teddington Society, whose purpose is to preserve and enhance the quality of life for everyone living and</li> </ul>
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																protection at a level that is similar to Green Belt and/or Metropolitan Open Land, for which there is both national and regional policy and guidance. Based on the above, it can be concluded that the application for a Local Green Space designation on this site meets all of the criteria as set out in the Publication Local Plan policy as well as national policy and guidance.
5	267	Philip Squire	Local Green Space - Udney Park Playing Fields, Teddington	Yes	Yes	Yes									<b>Entry left blank</b>	Support welcomed. No changes required.
6	92	Timothy E Godfray	Local Green Space - Udney Park Playing Fields, Teddington	Yes	Yes	Yes									It does seem to me that all of the following criteria has been met: The site is submitted by the local community; There is no current planning permission which once implemented would undermine the merit of a Local Green Space designation; The site is not land allocated for development within the Local Plan; The site is local in character and is not an extensive tract of land; Where the site is publicly accessible, it is within walking distance of the community; OR where the site is not publicly accessible, it is within reasonably close proximity to the community it serves; The Local Green Space is demonstrably special to a local community and holds a particular local significance, for example, because of its beauty, historic significance, recreational value (including as a playing field), tranquility or richness of its wildlife; The Local Green Space designation would provide protection additional to any existing protective policies, and its special characteristics could not be protected through any other reasonable and more adequate means There was full consultation, due process, cooperation with the community and "soundness". The purpose of Local Green Space status is to keep the entire site for wide community use. The developer which wants to build 140 apartments and four houses is doing so because it wishes to produce a profit for its shareholders.	Support welcomed. No changes required.

7	14	Philip Bailes	Local Green Space - Udney Park Playing Fields, Teddington Proposals Map Changes: Page number(s): 3 & 4	No					First there has been no consultation with the local community to designate the land at Udney Park Road as Local Green Space. From my experience this piece of land is under-utilised and is not an area of natural beauty or one that is readily available to the community. There is an approach proposed by Quantum Group to provide a Continuing Care Retirement Community on a portion of the site and open up the majority of the site for sporting, recreational and community use. I support this initiative. I am nearly 65 years of age and I am looking to find suitable accommodation to move into. This development could meet this need for me as there is not much suitable retirement property in Teddington. This would free up my 5 bedroom family home which I do not need now and allow a new family to flourish in Teddington.	Udney Park Playing Fields should be removed from the proposals map as a site that should be designated as Local Green Space. New Site allocation ref 475 should be proposed on this land instead which will be a socially beneficial development.	See Officer response to Comment ID 4 above.
8	13	Pamela Bailes	Local Green Space - Udney Park Playing Fields, Teddington Proposals Map Changes: Page number(s): 3 & 4	No					I am a resident of Teddington and I am looking to downsize to a retirement home. There is very little of this accommodation in Teddington. There is an approach by Quantum Group to provide a Continuing Care Retirement Community on a portion of the site and open up the majority of the site for sporting, recreational and community use. I support this initiative. I don't see any benefits from declaring this as local Green Space and I don't see how my Council can take this initiative without contacting the local community. I have had no contact from Richmond Council on this issue.	Udney Park Playing Fields should be removed from the Proposals Map as a site that should be designated as Local Green Space. New Site allocation ref 475 should be proposed on this land instead which will be a socially beneficial development.	See Officer response to Comment ID 4 above.
9	41	Simon Cartmell	Local Green Space - Udney Park Playing Fields, Teddington	No					As stated elsewhere in my submissions about the local plan, there is no reason to designate this land as LGS. It is currently OOLTI which has a presumption against development but does not make the hurdle so high as to be almost impossible to jump. The LGS designation has been put in place to prevent the current owners from developing a modest part of the site for elderly residential care and gifting the substantial majority of the land to a community interest company which will run the gifted community and sports facilities on behalf of the community. It is unnecessary and driven by the interests of local residents and not the wider community. There has been inappropriate and inconclusive Local consultation with the local council adopting a 'the answers no, now what's the question' attitude.	There needs to be a proper consultation with all the local interest groups, not just one or two self interested residents associations. Teddington desperately needs sports facilities, especially for evening activity. It also needs a proper community hall for a wide range of activities and as stated welsewher in the plan there is a need for nursery and child care facilities. All of this will be provided via the CIC if development proceeds. LGS designation will inhibit, if not prevent this. LGS designation was put in place without proper consultation, certainly not open minded consultation. The council have not listened to the proposals for the sporting and community gain side of the debate and as such have made an unbalanced decision that could lose	See Officer response to Comment ID 4 above.



14	197	Lesley Norris	Local Green Space - Udney Park Playing Fields, Teddington Proposals Map Changes: Page number(s): 3 & 4 Other: Chapter 12 - Comments in relation to other sites / site omissions. Ref: 475 - Allocation of new site - Former Imperial College Private Ground, Udney Park Road, Teddington	No		Yes	Yes		Accommodation specifically for the elderly with facilities in a sensitively developed open area is something that Teddington is lacking. And the provision of open space and sports facilities for the local community in a considerable part is a real bonus. At the moment the ground is under utilised and a waste of space. The proposed development seems to be the combination of the best of both worlds: sorely needed housing combined with good facilities for the local community.	If Local Green Space is designated it will be of no benefit to the community. The only people who will benefit will be the home owners around the park who want to keep the status quo; i.e. uninterrupted views over the land. This will not benefit anyone else in the area.	See Officer response to Comment ID 4 above.
15	3	Robin Ager	Local Green Space - Udney Park Playing Fields, Teddington Proposals Map Changes: Page number(s): 3 & 4 Other: Chapter 12 - Comments in relation to other sites / site omissions. Ref: 475 - Allocation of new site - Former Imperial College Private Ground, Udney Park Road, Teddington	No		Yes	Yes		I do not support the changes made to the Local Plan policy, where land at Udney park Road is to be designated as Local Green Space. I support the approach proposed by Quantum Group to provide a Continuing Care Retirement Community on a portion of the site and open up the majority of the site for sporting, recreational and community use. It is arguable that the Council should have intervened when the space was put up for sale, but this is irrelevant now. Quantum's proposal, to retain sporting facilities on most of the site, as well as providing the Retirement Community, is unexceptionable. If the company is denied this opportunity, the likely outcome is that the ground will become a wasteland.	Udney Park Playing Fields should be removed from the proposals map as a site that should be designated as Local Green Space. No one in the community will benefit from this designation. New site allocation ref 475 should be proposed on this land instead, which will be a socially beneficial development. There will be short term nuisance for those living near the site, but the Quantum proposals are clearly in the long term interest of future generations.	See Officer response to Comment ID 4 above.

16	179	Ursula Midgley	Local Green Space - Udney Park Playing Fields, Teddington Proposals Map Changes: Page number(s): 3 & 4 Other: Chapter 12 - Comments in relation to other sites / site omissions. Ref: 475 - Allocation of new site - Former Imperial College Private Ground, Udney Park Road, Teddington	No	Yes	Yes		<p>I am writing with regards the Richmond Local Plan, in particular the part that refers to the Udney Park Road Ground being designated as Local Green Space.</p> <p>I am disappointed that this appears to be something that has been put forward, as I don't think that this is a good use of this private piece of land. I live in Teddington, and although retired, am still active and enjoy sports.</p> <p>The proposals that the Quantum Group put forward to build accommodation for the elderly, as well as providing sports and other amenities fit perfectly with local needs. We would prefer to see this in our area - as opposed to something that will be of no benefit to us.</p> <p>I strongly object to the designation for local green space.</p>	<p>I wish to object to the change proposed in Richmond's Local Plan regarding the designation of Local Green Space. I do not think that the community has been fully consulted on this, as I know that many residents would prefer to have some community facilities - as opposed to none.</p> <p>The new site allocation (submitted by Quantum last year) should be proposed on this land, as I believe that this will bring far more benefits to a wide section of our community.</p>	See Officer response to Comment ID 4 above.
17	57	David Cross	Local Green Space - Udney Park Playing Fields, Teddington Proposals Map Changes: Page number(s): 3 & 4 Other: Chapter 12 - Comments in relation to other sites / site omissions. Ref: 475 - Allocation of new site - Former Imperial College Private Ground, Udney Park Road, Teddington	No	Yes	Yes		<p>I have attended an exhibition hosted by Quantum at the former ICL private ground to review their proposals to develop the site. It is obvious that Quantum have taken care and paid attention to local needs and I believe their proposals should be supported by the local council. Their proposal will deliver much needed accommodation for elderly care ((LP35 &amp; LP37), whilst providing an opportunity for local people to participate in a variety of sports and a community hub for everyone in the community to access in line with proposed policies LP28, LP30, LP31).</p> <p>If the local council designate the ground as Local Green Space my concerns are that Quantum will not be able to develop the site and therefore no one will be able to access or use it. A valuable piece of land in an urban area will become abandoned and a potential eye sore for the foreseeable future! With limited space available in Teddington we need to ensure this land is utilised rather than under utilised.</p>	<p>I do not believe the Local Plan is legally compliant or sound as I do not believe London Borough of Richmond upon Thames has consulted with the community sufficiently. It would seem that just a few local people, who are concerned about the status quo being changed have influenced the local council rather than views being sought from the wider community. I strongly support the new allocation put forward by the current owners of the site (reference 475).</p>	See Officer response to Comment ID 4 above.



18	56	Patricia Crampton	Local Green Space - Udney Park Playing Fields, Teddington Proposals Map Changes: Page number(s): 3 & 4 Other: Chapter 12 - Comments in relation to other sites / site omissions. Ref: 475 - Allocation of new site - Former Imperial College Private Ground, Udney Park Road, Teddington	No	Yes	Yes		<p>I am totally in support of Quantum's proposals for a mixed use site (older people and community). This will benefit many people, and gets my full backing. On the other hand, I do not agree with the idea set out in the Richmond Local Plan to make this area a local green space. This would be disastrous if it went ahead, as it would mean that nobody would get any benefit at all from this fantastic opportunity.</p> <p>I do not support the Local Plan designation, but am fully behind the Quantum proposals to provide elderly retirement accommodation and use the majority of the land for sports and leisure.</p>	I do not think that Udney Park Playing Fields should be allocated as Local Green Space. I suggest that this recommendation is not taken forward. Quantum's new site allocation should be proposed instead on this land.	See Officer response to Comment ID 4 above.
19	90	Molly Gittens	Local Green Space - Udney Park Playing Fields, Teddington Proposals Map Changes: Page number(s): 3 & 4 Other: Chapter 12 - Comments in relation to other sites / site omissions. Ref: 475 - Allocation of new site - Former Imperial College Private Ground, Udney Park Road, Teddington	No	Yes	Yes		<p>I am writing in regards to the Local Plan and in particular the plan to designate Udney Park playing fields as a Local Green Space.</p> <p>My understanding from the limited research I have undertaken is that this is now private land so I do not understand how making the area Local Green Space will benefit the community. Surely it is in the community's best interest to use this opportunity to ensure as many local people as possible can benefit from access to this site. Quantum's ideas of gifting a majority of the area to the community should be supported. I also like the idea of providing accommodation to our local elderly residents.</p> <p>My understanding is that Quantum's plans address LP35 and LP37 in the draft plan ie provision for suitable accommodation for the ageing population. By designating this space Local Green Space it will deny the provision of community sporting and recreation facilities and goes against proposed policies LP28, LP30 and LP31.</p> <p>I strongly object to it becoming Local Green Space.</p>	Quantum's plans should be taken very seriously and the site SHOULD NOT be allocated as Local Green Space. This is private land and making it Local Green Space will make it even harder for the site to be utilised going forwards.	See Officer response to Comment ID 4 above.

20	2	Carol Ager	Local Green Space - Udney Park Playing Fields, Teddington Proposals Map Changes: Page number(s): 3 & 4 Other: Chapter 12 - Comments in relation to other sites / site omissions. Ref: 475 - Allocation of new site - Former Imperial College Private Ground, Udney Park Road, Teddington	No		Yes	Yes			I do not support the changes made to the Local Plan policy where the land at Udney Park Road is to be designated as Local Green Space. I support the approach proposed by Quantum Group to provide a Continuing Care Retirement Community on a portion of the site and open up the majority of the site for sporting, recreational and community use. The sports facilities are basic at the moment. With investment and open access far more people could access high quality facilities. The land makes very little contribution to the character of the area because the majority of the site is screened from view. With the right imagination and control, the site could be used in a way that would benefit many more than it presently does, particularly the young people in the area, who benefit greatly from sporting activities.	Udney Park Playing Fields should be removed from the Proposals Map as a site that should be designated as Local Green Space. No one in the community will benefit from this designation. New allocation reference 475 should be proposed on this land instead, which will be socially beneficial development. I am surprised that the council has not consulted on this matter. The application for designation of this site to be made "Local Green Space" is not representative of the views of the community. No one will benefit other than those who live on the edges of the site.	See Officer response to Comment ID 4 above.
21	268	Steve Parsons, <b>Staines Town Football Club Ltd</b>	Local Green Space - Udney Park Playing Fields, Teddington Proposals Map Changes: Page number(s): 3 & 4 Publication Local Plan: Page number(s): 54-58 Paragraph number(s): 5.2 and 5.3 (and their sub-paragraphs) Policy no./name: LP13 and LP14. Other: Chapter 12 - Comments in relation to	No		Yes	Yes	Yes	Yes	This representation is made by the Staines Town Football Club Ltd committee on behalf of 600 members.  Having reviewed the proposals made for the former Imperial College sports grounds at Udney Park Road by the owners, Quantum, we would like to state our wholehearted support for both the provision of elderly care and retirement living facilities on part of the land, and for the improvement of the sports facilities on the other. We do not want to see this site designated as Local Green Space.  We have had an excellent relationship with the Kingston College, who currently use the site through a lease granted by the owners to Teddington Athletic Football Club, supporting their men's (and to a lesser extent women's) association football academy programmes ever since 2003. At a time when Government policy has been to extend the years that young people spend in education, we believe that Kingston College provides a very worthwhile setting for these 16 to 19 year-olds to continue their education, whilst also giving them an excellent grounding in the benefits of organised sport. At the same time, Kingston College's infrastructure supports our own aims at Staines	Whilst wholesale development of the site is not appropriate, Staines Town FC strongly support the new allocation put forward by Quantum in the last round of representations (Reference 475). This could deliver real social benefit, securing the future of sporting use on the site.  We hope that the points made in Q6 will be appreciated by the decision-makers responsible for the site and that it is not designated as Local Green Space. Staines Town FC and Kingston College want the opportunity to look forward to many more years of working with young footballers in the area, and giving them an excellent grounding in something that can provide them with a lifetime of enjoyment, enhance their fitness and social responsibility, and give some of them an inroad to future earnings.  Quantum's proposals are an opportunity to help us do this.	See Officer response to Comment ID 4 above.  It should be noted that the designation as a Local Green Space does not prevent the site's continued use for sport purposes and as a playing field. Indeed, the Local Plan and its policies encourage improved and enhanced facilities for outdoor open space and sport use, as set out in Policy LP 31.

other sites / site omissions.  
Ref: 475 - Allocation of new site - Former Imperial College Private Ground, Udney Park Road, Teddington

Town Football Club, of introducing and retaining local players to our coaching and competitions. They are able to receive first-rate coaching from both College and Club staff, and a healthy number of them have progressed from the age-group teams to the full adult side playing an a high level of English football. Over the last thirteen years, well over 100 boys have gone on to appear in our First Team (giving them the opportunity to earn a wage from playing sport), many others have played for other clubs at similar levels, and a handful have gone on to make careers as full professionals with Football League clubs in England or in other countries. All of these players are local to the district in which we operate – the London Boroughs in the south and west of the capital, and those adjoining them in north Surrey.

In order to maintain this high quality association, it is essential that adequate grounds exist for the playing of matches, which can be certain of use in the long-term. Whilst we currently have the benefit of short term use of the site, we know that long-term use is not guaranteed without a comprehensive plan for the site. We therefore support a solution that provides the community (and us) certainty of use.

Moreover, while much can be done on the existing laid out training ground, the ‘hook’ to attract young people and to retain them once they are engaged, is to be able to offer them a decent quality of match practice at under 18, under 19, and senior levels. Our own ground at Staines caters for some of this demand, with floodlit midweek fixtures, but owing to its heavy usage and proximity to the Thames, it is not suitable to be used more than about 15 times per season for non-First Team games. The leagues in which we play insist upon decent facilities, and we are finding it increasingly difficult to hire these anywhere in the belt between Kingston and Staines, which would suit us. Over the years, we have lost, through external pressures, grounds at (for example) Laleham, Tolworth, Twickenham, Cobham, and Teddington, each of which has disrupted the programme that the College and the Club has put on.

The facility at Udney Park Road provides a perfect setting for our requirements, and we are very eager to benefit from it into the future. We do however

										<p>understand that sports facilities do not exist ‘in a bubble’, and that there are many other demands upon land in our area. We therefore believe that the proposal to use part of the site sensitively for elderly care and retirement living will be in keeping with the area, and provide a valuable amenity to the community. This will unlock the plans to enhance the existing sports facilities on the remaining majority of the site. The existing facilities could do with some updating and a degree of re-organisation, in order to provide suitable facilities for many years to come and we would expect that should the site be permitted for the Quantum proposals that investment is secured as a requirement of the planning permission and the future of the land ownership is also secured for the community.</p> <p>We appreciate that developing on any open land in the Borough is not something to allow easily or without careful thought. However, in times when such facilities are scarce and public funding for facilities is no longer readily available, we think as a community we need to make our existing assets work harder. Therefore we support the approach being put forward by Quantum and we do not support the proposed Local Green Space designation for the land.</p>	
22	183	Mike Morris	Local Green Space - Udney Park Playing Fields, Teddington							<p>As local resident I would like to <b>support</b> the change of designation to “Local Green Space” this will give protection against development ensuring that it remains as a community use sports facility, I found the email your group circulated misleading in its content and leading and seeking to manipulate consultation over this matter.</p> <p>If you intend to use the email you circulated to indicate there is opposition to the designation proposed by Richmond Council and allowing you to filter comments this is a misuse of democratic principles and as leading and disingenuous as the comments document handed out by Quantum at their “public consultation”. As you have set yourselves up as an honest collator of local opinion I would expect you to include the comments made in this email in any representations to the LA.</p>	<p>Support welcomed. No changes required.</p> <p>It is noted that the comments in the second paragraph in relation to the email circulation are not intended for the Council.</p>

23	217	Shaun Perry	Local Green Space - Udney Park Playing Fields, Teddington Proposals Map Changes: Page number(s): 3 & 4 Other: Chapter 12 - Comments in relation to other sites / site omissions. Ref: 475 - Allocation of new site - Former Imperial College Private Ground, Udney Park Road, Teddington	No	Yes	Yes		The designation of Local Green Space (Map proposal changes) will fail to support the needs of our community under Local Plan policies LP28; LP30 and LP31; making it unsound. Quantum's recommendations are more in line with what local people need - a safe place for elderly people to live, as well as the means for people to have access to sport and other community facilities.	I would like to see the following changes made: 1) overturn the current recommendation for the designation of Local Green Space - this will only benefit a few people. 2) replace it with the new site allocation (Reference 475) - it will provide many benefits to the whole community.	See Officer response to Comment ID 4 above.
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24	193	Anil Kumar Namburi	Local Green Space - Udney Park Playing Fields, Teddington Proposals Map Changes: Page number(s): 3 & 4 Publication Local Plan: Page number(s): 54-58 Paragraph number(s): 5.2 and 5.3 (and their sub-paragraphs) Policy no./name: LP13 and LP14. Other: Chapter 12 - Comments in relation to other sites / site omissions. Ref: 475 - Allocation of new site - Former Imperial College Private Ground, Udney Park Road, Teddington	No	Yes	Yes		I do not want to see this land used as local green space, and therefore do not support the local plan as it stands. I am connected to the local pharmacy in Park Road, which I understand serves many of the patients of the local GP. It is a well known fact that the GPs are in need of new premises, and one of their options is to relocate to Udney Park Road. This will not happen if the local green space designation goes ahead. It would deny the many patients and the doctors the opportunity to benefit from the facilities and services that they need. I support the approach made by Quantum to provide care facilities, community and sport - as well as a new surgery.	I would like you to remove the designation for Local Green Space in the map changes, and ask that Quantum's proposals (from the last round of representations - ref 475) are accepted instead. These are more appropriate for all the community's needs.	See Officer response to Comment ID 4 above.  In relation to the comments on the GP surgery, it should be noted that the Council is working closely with the Richmond Clinical Commissioning Group to address this issue and consider all available options.
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25	203	Zohre <b>Omidyegrneh</b>	Local Green Space - Udney Park Playing Fields, Teddington Proposals Map Changes: Page number(s): 3 & 4 Publication Local Plan: Page number(s): 54-58 Paragraph number(s): 5.2 and 5.3 (and their sub-paragraphs) Policy no./name: LP13 and LP14. Other: Chapter 12 - Comments in relation to other sites / site omissions. Ref: 475 - Allocation of new site - Former Imperial College Private Ground, Udney Park Road, Teddington	No	Yes	Yes	Yes	Yes	I am aware of the plans for Udney Park Road and the playing fields there. I think Quantum's plans are something that is needed in the local community, particularly the proposal of a purpose built doctors surgery for Park Road Surgery. As I am connected to the local pharmacy I know in particular how much this is needed. I also feel the provision of public open space, community sporting facilities and elderly care and retirement living is a great use of what is currently private land. This site should not be designated as Local Green Space preventing these benefits from being provided.	I wish to see Quantum's representation to the previous round of Local Plan consultation (ref 475) implemented and the current local plan designation for local green space removed. The reason for this is that Quantum's representation will bring immediate benefits for ALL the community, and not just for a small number of residents.	See Officer response to Comment ID 4 above.  In relation to the comments on the GP surgery, it should be noted that the Council is working closely with the Richmond Clinical Commissioning Group to address this issue and consider all available options.
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26	271	Susan <b>Stevens</b>	Local Green Space - Udney Park Playing Fields, Teddington Proposals Map Changes: Page number(s): 3 & 4 Other: Chapter 12 - Comments in relation to other sites / site omissions. Ref: 475 - Allocation of new site - Former Imperial College Private Ground, Udney Park Road, Teddington	No	Yes	Yes	I do not support any change to the Local Plan that would involve the Udney Park Road land being designated as Local Green Space. Teddington is in need of more healthcare facilities e.g. doctor's surgery, elderly care facilities and sports facilities which can be accessed by as many groups as possible,	The former ICL private ground in Udney Park Road needs to be removed from the proposals map as a site to be designated as Local Green Space. A new site allocation ref 475 should be proposed for this land. It is irrational that the views of a few residents local to the site, should override the needs of a far greater number of Teddington's residents, of all ages. Teddington has other green spaces, and issues of healthcare, exercise, community and housing are more important.	See Officer response to Comment ID 4 above.  In relation to the comments on the GP surgery, it should be noted that the Council is working closely with the Richmond Clinical Commissioning Group to address this issue and consider all available options.
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27	252	Anand Shah	Local Green Space - Udney Park Playing Fields, Teddington Proposals Map Changes: Page number(s): 3 & 4 Publication Local Plan: Page number(s): 54-58 Paragraph number(s): 5.2 and 5.3 (and their sub-paragraphs) Policy no./name: LP13 and LP14. Other: Chapter 12 - Comments in relation to other sites / site omissions. Ref: 475 - Allocation of new site - Former Imperial College Private Ground, Udney Park Road, Teddington	No	Yes	Yes		<p>I do not support the changes in the Local Plan as i do not agree that Udney Park Road should become Local Green Space. This, in my opinion, is a complete waste of resource, and is blatantly ignoring the needs of the community as a whole. We need retirement accommodation. We need a place for community, sport and recreation. We need a new GP surgery.</p> <p>Quantum has submitted proposals that cover all the above, and gets my full support. I am involved with the patients of the GP surgery at Park Road, and know just how much they need a new doctor's surgery.</p> <p>It seems ludicrous to ignore all these needs for the sake of a few residents who don't want their view spoilt.</p>	<p>As I do not believe that the needs of local people have been listened to, I do not support the use of Local Green Space for Udney Park Road. Please can you ensure that Quantum's representation (475) replaces the current changes proposed, as it is far more in line with what the majority needs.</p>	<p>See Officer response to Comment ID 4 above.</p> <p>In relation to the comments on the GP surgery, it should be noted that the Council is working closely with the Richmond Clinical Commissioning Group to address this issue and consider all available options.</p>
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28	215	John Perry	Local Green Space - Udney Park Playing Fields, Teddington Proposals Map Changes: Page number(s): 3 & 4 Other: Chapter 12 - Comments in relation to other sites / site omissions. Ref: 475 - Allocation of new site - Former Imperial College Private Ground, Udney Park Road, Teddington		No		Yes	Yes			I am writing regarding the part in the Local Plan that states the Udney Park Rd playing fields are to be made local green space. When the playing fields were owned by Imperial, I worked as a groundsman there for 13 years, so am well placed to comment on how this space was used. Contrary to popular belief, only a small number of people had access to the fields - and this was on an ad hoc basis. Until I worked there, I had never set foot on this ground, nor have many people who lived locally! Unfortunately, many people are under the impression that the ground was open to the public, and that it has been taken away from them. This is not the case. Quantum has purchased the land, and has put forward some proposals which mean that not only are they building for the elderly (on a small part of the site) - but giving the majority of it to the community. Quantum are doing more for local sports and groups than anyone else, and I support their plans. I do not agree to the land becoming local green space - it would be such a waste, and a missed opportunity for many people in the area.	I would like to see Quantum's new site allocation accepted, as many more people in our community are deserving of a new sports, leisure and community facilities. This will secure the site so that future generations can benefit. I do not agree with the designation of local green space, as it will not serve any purpose.	See Officer response to Comment ID 4 above.
29	176	Shirley Meaker	Local Green Space - Udney Park Playing Fields, Teddington Proposals Map Changes: Page number(s): 3 & 4 Other: Chapter 12 - Comments in relation to other sites / site omissions. Ref: 475 - Allocation of new site - Former Imperial College Private Ground, Udney Park Road, Teddington	Yes	No	Yes	Yes	Yes			I would like to add Quantum are doing their best to offer a good deal, playing field for all and I'm sure we would all appreciate a Doctors surgery in our road. What is there not to like. If planning fails it reverts to private land and no one can use it. What's clever in that. So Council planners get the deal done and dusted ASAP.		See Officer response to Comment ID 4 above.  In relation to the comments on the GP surgery, it should be noted that the Council is working closely with the Richmond Clinical Commissioning Group to address this issue and consider all available options.

30	209	Pamela Bryant, Patient Participation Group, <b>Park Road Surgery Teddington</b>	Local Green Space - Udney Park Playing Fields, Teddington																														
													<p>This Patient Participation Group (PPG) was formed approximately 7 years ago - its role and purpose is to protect and enable the Practice to serve its population. It is in this role we write to support the Park Road Surgery's decision to oppose the redesignation of the Udney Park Road site as Local Green Space. Additionally we also confirm our strong support for the alternative site in North Lane Teddington as being a suitable site.</p>	<p>See Officer response to Comment ID 4 above.</p> <p>In relation to the comments on the GP surgery, it should be noted that the Council is working closely with the Richmond Clinical Commissioning Group to address this issue and consider all available options.</p>																			
													<p>This decision has been reached by the PPG on the grounds that there is no alternative for the Surgery facilities available in the area covered by this Practice other than these two sites. Great efforts have been made in the past 7 years, without success to find suitable alternative premises or a site to develop. Either the Udney Park Road or the North Lane sites would provide that opportunity to develop new and improved facilities for our patient population.</p>																				
													<p>Currently the surgery functions from a semi-detached Victorian dwelling. Its patient list numbers 13,100 patients. Since the surgery first occupied these premises the patients list has more than trebled. It is the second largest practice in the Borough of Richmond, operating out of less than 300 sq.m whereas the NHS Standards require in excess of 1,000 sq.m.</p>																				
													<p>Resulting from these very cramped conditions, some consulting rooms are inaccessible for certain patients and a severe lack of privacy when speaking to the reception staff and many other basics in the waiting room.</p>																				

31	306	Jane Whitworth	Local Green Space - Udney Park Playing Fields, Teddington Proposals Map Changes: Page number(s): 3 & 4 Other: Chapter 12 - Comments in relation to other sites / site omissions. Ref: 475 - Allocation of new site - Former Imperial College Private Ground, Udney Park Road, Teddington	No	Yes	Yes	I do not support the changes made to the Local Plan policy where the land at Udney Park Road is to be designated as Local Green Space. This would prevent the space being actively used in the future. I support the Quantum Group's approach to provide a Continuing Care Retirement Community on a portion of the site while providing the larger portion of the space for sporting, recreational and community use. This space has been very underused for many years and it would be very beneficial to the community if Quantum's plans were allowed. This is not, nor has it been, Common land. It is privately owned and its owners are prepared to develop it for the benefit of all this seems to be the best option. At the moment it is in need of development if it is to be used by local sports groups and others. There is also a need for good provision for the elderly. Quantum's plans are imaginative and they seem to be very caring of local public needs.	Udney Park Playing Fields - and in all my over 40 years in Teddington I have not heard it so called - should be removed from the Proposals Map as a site that should be designated as Local Green Space. Such a designation will be very unhelpful for the community. Therefore New Site allocation ref 475 should be proposed on this land instead which will be a socially beneficial development.	See Officer response to Comment ID 4 above.
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32	102	Kalpana Hannapaneni	Local Green Space - Udney Park Playing Fields, Teddington Proposals Map Changes: Page number(s): 3 & 4 Publication Local Plan: Page number(s): 54-58 Paragraph number(s): 5.2 and 5.3 (and their sub-paragraphs) Policy no./name: LP13 and LP14. Other: Chapter 12 - Comments in relation to other sites / site omissions. Ref: 475 - Allocation of new site - Former Imperial College Private Ground, Udney Park Road, Teddington	No	Yes	Yes		I work in conjunction with the Pharmacy in Park Road, Teddington and have heard about the plans to designate Udney Park (ICL Grounds) as Local Green Space. We have a desperate need for more GP facilities in Teddington along with a need for suitable accommodation for the aging population as stated in the draft Local Plan (LP35 & LP37). Quantum's plans will help address both these issues. Their proposals show that they only intend to build on a proportion of the land - the rest will be given to the local community for community benefit. I do not think this land should be designated as Local Green Space as this will deny local residents of benefitting from this land.	I think Quantum's plans (ref 475) should be adopted rather than the land be designated as Local Green Space. No one will benefit from the space being designated as Local Green Space other than a few residents who live immediately adjacent to the site. With such limited open space in Teddington we must ensure such valuable space is utilised for maximum effect and I believe Quantum's plans make an excellent job of offering benefits to a large number of people in Teddington.	See Officer response to Comment ID 4 above.
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33	114	Suzanne Hobbs	Local Green Space - Udney Park Playing Fields, Teddington Proposals Map Changes: Page number(s): 3 & 4 Other: Chapter 12 - Comments in relation to other sites / site omissions. Ref: 475 - Allocation of new site - Former Imperial College Private Ground, Udney Park Road, Teddington	No	Yes	Yes		The land is screened off/accessible to a small group of users. The site does not contribute beneficially for the purposes of open space. Without public access to the site and without visual openness the site delivers little benefit to the community- its community groups, children and other residents.	I have not been consulted and don't feel that the designation of a 'local green space' meets the needs and wants of the community. If this comes into place publicly owned, accessible sports pitches and open space will be denied.	See Officer response to Comment ID 4 above.
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34	137	Sri Lakshmi Katragunta	Local Green Space - Udney Park Playing Fields, Teddington Proposals Map Changes: Page number(s): 3 & 4 Publication Local Plan: Page number(s): 54-58 Paragraph number(s): 5.2 and 5.3 (and their sub-paragraphs) Policy no./name: LP13 and LP14. Other: Chapter 12 - Comments in relation to other sites / site omissions. Ref: 475 - Allocation of new site - Former Imperial College Private Ground, Udney Park Road, Teddington	No	Yes	Yes	Yes	Yes	I am aware of the plans for Udney Park Road and the playing fields there. I think Quantum's plans are something that is needed in the local community, particularly the proposal of a purpose built doctors surgery for Park Road Surgery. As I am connected to the local pharmacy I know in particular how much this is needed. Benefits include: - gifting of 8 acres of land to the newly formed Teddington Community Sport Ground Community Interest - Company making previously private land available to everyone in the community - New public open space to enrich the lives, health and well-being of residents and visitors - Enhanced play and sporting opportunities for all ages and abilities - Space for local groups and community activities - Modern multi-use facilities to meet the needs of local clubs and associations - Affordable housing solutions for the elderly population - freeing up much needed family housing - New publically accessible healthcare and GP services and employment opportunities - A sustainable and protected legacy for future generations This site should not be designated as Local Green Space preventing these benefits from being provided.	I wish to see Quantum's representation to the previous round of Local Plan consultation (ref 475) implemented and the current local plan designation for Local Green Space removed. The reason for this is that Quantum's representation will bring immediate benefits for ALL the community as noted in Q6, and not just for a small number of residents.	See Officer response to Comment ID 4 above.
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36	5	Felicity Aitchison	Local Green Space - Udney Park Playing Fields, Teddington Proposals Map Changes: Page number(s): 3 & 4 Other: Chapter 12 - Comments in relation to other sites / site omissions. Ref: 475 - Allocation of new site - Former Imperial College Private Ground, Udney Park Road, Teddington	No	Yes	Yes	<p>I do not agree with the Local Plan policy to designate the land at Udney Park Road as Local Green Space. I am not in favour of any change that might prevent development including the provision of community sporting and recreational facilities.</p> <p>It is a requirement that the application for Local Green Space is made by the community. I am a local resident of Teddington, living adjacent to this land, and I was not consulted on this application. Indeed, I am a member of the main group supporting the application, the Teddington Society, who also did not seek my opinion and certainly do not represent my views on this matter.</p> <p>The site does not contribute beneficially for the purposes of open space provision because it is private land because it does not have an open visual aspect at street level. The site makes very little contribution to the character of the area because the majority of the site is screened from view. Without public access to the site and without a visual benefit through lack of visual openness, the site provides very little benefit to anyone.</p> <p>Designating this land as Local Green Space may prohibit the provision of community sporting and recreational facilities and thus fail to support the needs of the community under proposed Local Plan policies, rendering the plan unsound. For example; proposed Policy LP31 Public Open Space, Play Space, Sport and Recreation - lack of improvement of existing facilities and spaces, including their openness and character and their accessibility.</p> <p>I support the approach by Quantum Group for continuing care retirement provision on a small proportion of the site with the remainder of the land developed for sport and recreation and gifted into local ownership and control in perpetuity.</p> <p>With imagination and control, the site could be used in a way that would benefit many more than it currently does and could become a valued community asset.</p>	<p>Udney Park Playing Fields should be removed from the proposals maps a site that should be designated as Local Green Space. They will not be any community benefit from this designation.</p> <p>New Site allocation ref 475 should be proposed on this land instead as a socially beneficial development.</p> <p>I am concerned that the council has not consulted the community on this matter. Those making the application cannot be regarded as representative of the views of the community.</p> <p>Whilst wholesale development of the site would be inappropriate and undesirable, I strongly favour a new allocation that will permit some controlled development delivering real social benefit, securing the future of the site and opening it up to the whole community.</p>	See Officer response to Comment ID 4 above.
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37	150	Sara Lalenia	Local Green Space - Udney Park Playing Fields, Teddington Proposals Map Changes: Page number(s): 3 & 4 Publication Local Plan: Page number(s): 54-58 Paragraph number(s): 5.2 and 5.3 (and their sub-paragraphs) Policy no./name: LP13 and LP14. Other: Chapter 12 - Comments in relation to other sites / site omissions. Ref: 475 - Allocation of new site - Former Imperial College Private Ground, Udney Park Road, Teddington	No		Yes	Yes			<p>I am involved with the local Pharmacy in the Park Road and have heard many customers about colleagues about the plans for Udney Park Playing fields and in particular the plans to make Udney Park Local Green Space.</p> <p>I do not understand why the Council are so against the developer's plans - Quantun seem to have given their plans a lot of thought and their plans to build a new doctors surgery as well as a community clubhouse, apartments and houses for the elderly seems a sensible idea and something the community desperately needs. I often hear people who come into the pharmacy complaining about the lack of housing available in "later life" and I also see first hand the demands which are being placed on the existing doctors surgery in Park Road.</p>	<p>I would like to see the land in Udney Park being used by everyone in the Community and I object to it being designated as Local Green Space. I fail to see how making it Local Green Space will help support local people, rather it will make it more difficult for the land to be utilized by a wide range of people. Quantum's plans (site allocation 475) should be approved.</p>	See Officer response to Comment ID 4 above.
38	162	Ian Lupson	Local Green Space - Udney Park Playing Fields, Teddington Page number(s): 3 & 4 Map(s): 2.2	Yes	Yes	Yes				<p>This form- which I am told is the only form that can be used for representations, a mere email will not suffice - seems to have been drafted on the basis that an interested party will only go to the trouble of commenting if he/she considers the local plan as unsound and objects to it.</p> <p>In fact, in so far as the Local Plan concerns the map change proposal that I have indicated (Udney Park Playing Fields) I consider the designation entirely <u>sound</u>, and am wholly <u>in support</u>.</p> <p>I am aware of an internet campaign against designation, but do not understand how that campaign could be said to affect the soundness of the decision.</p>		See Officer response to Comment ID 4 above.

39	45	Cherry Cheshire	Local Green Space - Udney Park Playing Fields, Teddington Proposals Map Changes: Page number(s): 3 & 4 Other: Chapter 12 - Comments in relation to other sites / site omissions. Ref: 475 - Allocation of new site - Former Imperial College Private Ground, Udney Park Road, Teddington	No	Yes	Yes	<p>I do not agree with the local plan for a number of reasons which I have set out below:-</p> <p>I am a resident of Udney Park Road and have lived in Teddington for most of my life. My house overlooks the site. I am now at the stage of my life where I need to think about my future and for the last few years I have been looking for somewhere to live in Teddington where I can maintain my independence without being a burden to the state or the NHS. My options in Teddington are incredibly limited - in fact as far as I can see the only retirement development in the whole of Teddington is Fullerton Court. What Quantum is offering for retired residents is urgently needed in Teddington - a community of retirement homes, a nursing home, new healthcare facilities on a SMALL part of land which has always been underutilised. It will unrestrict public access and provide a new club house and community space for EVERYONE to enjoy. At a time when councils are struggling for funding, isn't this a win win situation for Teddington?</p> <p>I have read the Richmond CCG report which states their vision is to provide person centred, integrated, high quality care and support that promotes independence and wellbeing so that people are prevented from becoming unwell and are supported to maintain their social and community links. Quantum's proposals achieve all of these objectives.</p> <p>I strongly oppose to the land being Local Green Space as it will deny residents like myself the opportunity to move out of family homes (which are unsuitable for later life) and enjoy my retirement without being a burden to society. You are also risking denying the local community of the MANY benefits of new sporting facilities, public open space and much needed community facilities.</p> <p>I have also made my views known to Richmond Council by speaking at the cabinet meeting held on 13/12/16 where they agreed to take the proposed designation forward as part of the Local Plan. What I was most horrified about at the Council meeting was one of Councillor's response regarding elderly care in the borough. Apparently he thinks there is plenty available in Richmond! I would love to see the evidence of this as I have been looking for</p>	<p>I strongly support the new allocation put forward by the current owners, Quantum (ref 475) and do not wish to see this land designated as Local Green Space.</p> <p>I do not see how anyone in the community will benefit other than the privileged few who live directly next to the site and enjoy their view over private land and I do not feel making this Local Green Space represents the wishes and views of the local community.</p>	See Officer response to Comment ID 4 above.
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somewhere in Teddington where I can live independently but I am not a burden on the State, Quantum's proposals will enable me to do this.

40	253	Arshani Shah	Local Green Space - Udney Park Playing Fields, Teddington Proposals Map Changes: Page number(s): 3 & 4 Publication Local Plan: Page number(s): 54-58 Paragraph number(s): 5.2 and 5.3 (and their sub-paragraphs) Policy no./name: LP13 and LP14. Other: Chapter 12 - Comments in relation to other sites / site omissions. Ref: 475 - Allocation of new site - Former Imperial College Private Ground, Udney Park Road, Teddington	No	Yes	Yes		<p>I am writing to object to the Local Plan - changes for Udney Park Rd (designation of Local Green Space). I do not agree that this is a good use of the land, mainly because the alternative put forward by Quantum (elderly housing/public sport and community facilities/ new GP surgery) are far more beneficial.</p> <p>I am familiar with the Park Rd surgery via my involvement with the local pharmacy. It is patently obvious that the practice urgently needs new premises. The only way that they will get more adequate facilities will be to move[.] If, as the current Local Plan states, the land is allocated local green space, then the public will be denied a new surgery. In the long term, shouldn't we [be] more concerned for people's health and well being than a view and a bit of greenery?</p>	<p>I would like to see Quantum's representation for Udney Park Road taken forward, as I believe that their plans are far more aligned to the local people's needs. I do not believe that the community has been properly informed about the designation of Local Green Space.</p>	<p>See Officer response to Comment ID 4 above.</p> <p>In relation to the comments on the GP surgery, it should be noted that the Council is working closely with the Richmond Clinical Commissioning Group to address this issue and consider all available options.</p>
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42	78	Shazia <b>Ferdous</b>	Local Green Space - Udney Park Playing Fields, Teddington Proposals Map Changes: Page number(s): 3 & 4 Publication Local Plan: Page number(s): 54-58 Paragraph number(s): 5.2 and 5.3 (and their sub-paragraphs) Policy no./name: LP13 and LP14. Other: Chapter 12 - Comments in relation to other sites / site omissions. Ref: 475 - Allocation of new site - Former Imperial College Private Ground, Udney Park Road, Teddington	No	Yes	Yes	<p>I am connected with the pharmacy in Park Road and have seen and read about the Local Plan for Teddington and in particular how it will affect the land in Udney Park Road.</p> <p>I do not agree with the land becoming Local Green Space as I can not understand how this will benefit the local community. Quantum's plans seem to offer an excellent use of the space - enabling people across the community to benefit. Being connected to the pharmacy, I have seen first hand just how desperate the existing surgery in Park Road is for space and also I hear frequently from patients how difficult it is to get an appointment as the doctors do not have enough capacity. It seems to be that everything must be done to ensure Quantum's plans are seriously considered and the land should not be made Local Green Space.</p>	<p>I do not think Udney Park Playing Fields should be designated as Local Green Space and believe that Quantum site (ref 475) should be implemented instead. It offers an opportunity to benefit the WHOLE community rather than the existing space being enjoyed by a chosen few and I think Quantum's plans will help ensure this valuable open space can be utilised to maximum effect.</p>	See Officer response to Comment ID 4 above.
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43	177	Sirvosh Lalenia, <b>Medco Pharmacy</b>	Local Green Space - Udney Park Playing Fields, Teddington Proposals Map Changes: Page number(s): 3 & 4 Publication Local Plan: Page number(s): 54-58 Paragraph number(s): 5.2 and 5.3 (and their sub-paragraphs) Policy no./name: LP13 and LP14. Other: Chapter 12 - Comments in relation to other sites / site omissions. Ref: 475 - Allocation of new site - Former Imperial College Private Ground, Udney Park Road, Teddington	No	Yes	Yes		<p>I have followed the proposals that Quantum has for the land at Udney Park Road, and am impressed with the consideration given to the community. The elderly accommodation, sports and recreation facilities and the doctors surgery are all needed. I am personally involved with the chemists that turns over all the prescriptions for the Park Road surgery so am fully aware of its need to move to more suitable premises. The Quantum proposals will allow this to happen.</p> <p>The local plan states that this site should be designated as Local Green Space. In my opinion, there is no value to the wider community - nor indeed the many patients who are registered with the very busy surgery.</p> <p>I do not support the local plan designation as it stands.</p>	<p>I wish to see Quantum's representation (ref 475) implemented and the current local plan designation for local green space removed. The reason for this is that Quantum's representation will bring immediate benefits for ALL the community, and not just for a small number of residents.</p>	<p>See Officer response to Comment ID 4 above.</p> <p>In relation to the comments on the GP surgery, it should be noted that the Council is working closely with the Richmond Clinical Commissioning Group to address this issue and consider all available options.</p>
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44	311	Hastaran Zamanpour	Local Green Space - Udney Park Playing Fields, Teddington Proposals Map Changes: Page number(s): 3 & 4 Publication Local Plan: Page number(s): 54-58 Paragraph number(s): 5.2 and 5.3 (and their sub-paragraphs) Policy no./name: LP13 and LP14. Other: Chapter 12 - Comments in relation to other sites / site omissions. Ref: 475 - Allocation of new site - Former Imperial College Private Ground, Udney Park Road, Teddington	No	Yes	Yes	As someone who works with the local pharmacy in Park Road, I wish to object to ICL private grounds in Udney Park Road becoming Local Green Space in the Local Plan. If this goes ahead it will deny the local community the opportunity to benefit from Quantum's proposals. There is under provision for suitable accommodation for the aging population in this area and Quantum's plans will help address this. Also, their plans will help facilitate social interaction and general community wellbeing and happiness which is a policy proposed (LP28) in Richmond Council's Local Plan. I also like the idea of Quantum building a new doctors surgery - as this will clearly benefit not just residents of their development but many local people who live near the playing fields - the existing doctors surgery is over-stretched to bursting and a new surgery is urgently needed.	The Council must not deny local residents of this opportunity to provide new healthcare facilities, homes for older people, sports facilities and a hub for the local community. It seems that Quantum are doing an excellent job in consulting local people and as a local resident I approve of their plans. This space must not be designated as Local Green Space and this will just create a no win situation for the community of Teddington.	See Officer response to Comment ID 4 above.  In relation to the comments on the GP surgery, it should be noted that the Council is working closely with the Richmond Clinical Commissioning Group to address this issue and consider all available options.
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45	54	Douglas R Craig	Local Green Space - Udney Park Playing Fields, Teddington Proposals Map Changes: Page number(s): 3 & 4 Other: Chapter 12 - Comments in relation to other sites / site omissions. Ref: 475 - Allocation of new site - Former Imperial College Private Ground, Udney Park Road, Teddington	No	Yes	Yes	<p>My wife and I attended Quantum's exhibition to look at their plans for the former ICL private ground. I see the potential of how developing this site can help older people in the local community who are looking for somewhere to live in the local area which provides for their needs as they become older. I believe that as space becomes a greater premium, particularly in London, we need to make the most of the land we have available. Quantum's plans seem to benefit the wider community, by providing homes for older people, an opportunity for local people to participate in sports and recreation (setting up the CIC) and providing much needed healthcare facilities.</p> <p>Designating this land as Local Green Space will fail to support the needs of the community under the proposed Local Plan (LP28, LP30 and LP 31).</p>	<p>It appears that the council have not consulted the local community about these proposals and I do not believe the application to designate this site as Local Green Space represents the views of the local community. I feel Quantum's proposal to build retirement living on a portion of the land is a much better alternative and will benefit more people in Teddington and Richmond.</p>	See Officer response to Comment ID 4 above.
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46	4	David Aitchison	Local Green Space - Udney Park Playing Fields, Teddington Proposals Map Changes: Page number(s): 3 & 4 Other: Chapter 12 - Comments in relation to other sites / site omissions. Ref: 475 - Allocation of new site - Former Imperial College Private Ground, Udney Park Road, Teddington	No	Yes	Yes	<p>I do not agree with the Local Plan policy to designate the land at Udney Park Road as Local Green Space. Such designation will effectively prohibit development including the provision of community sporting and recreational facilities. It is a requirement that the application for Local Green Space is made by the community. I am a local resident of Teddington, living adjacent to this land, and I was not consulted on this application. Indeed, I am a member of the main group supporting the application, the Teddington Society, who also did not seek my opinion and certainly do not represent my views on this matter.</p> <p>The site does not contribute beneficially for the purposes of open space provision because it is private land because it does not have an open visual aspect at street level. The site makes very little contribution to the character of the area because the majority of the site is screened from view. Without public access to the site and without a visual benefit through lack of visual openness, the site provides very little benefit to anyone. Designating this land as Local Green Space will prohibit the provision of community sporting and recreational facilities and thus fail to support the needs of the community under proposed Local Plan policies, rendering the plan unsound. For example; proposed Policy LP31 Public Open Space, Play Space, Sport and Recreation - lack of improvement of existing facilities and spaces, including their openness and character and their accessibility. I support the approach by Quantum Group for continuing care retirement provision on a small proportion of the site with the remainder of the land developed for sport and recreation and gifted into local ownership and control in perpetuity. With imagination and control, the site could be used in a way that would benefit many more than it currently does and could become a valued community asset.</p>	<p>Udney Park Playing Fields should be removed from the proposals maps a site that should be designated as Local Green Space. They will not be any community benefit from this designation. New Site allocation ref 475 should be proposed on this land instead as a socially beneficial development. I am concerned that the council has not consulted the community on this matter. Those making the application cannot be regarded as representative of the views of the community. Whilst wholesale development of the site would be inappropriate and undesirable, I strongly favour a new allocation that will permit some controlled development delivering real social benefit, securing the future of the site and opening it up to the whole community.</p>	See Officer response to Comment ID 4 above.
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47	32	Elaine Brewis	Local Green Space - Udney Park Playing Fields, Teddington Proposals Map Changes: Page number(s): 3 & 4 Other: Chapter 12 - Comments in relation to other sites / site omissions. Ref: 475 - Allocation of new site - Former Imperial College Private Ground, Udney Park Road, Teddington	No	Yes	Yes	<p>I do not support the changes made to the Local Plan policy where the land at Udney Park Road is to be designated as Local Green Space. I support the approach proposed by Quantum Group to provide a Continuing Care Retirement Community on a portion of the site and open up the majority of the site for sporting, recreational and community use.'</p> <p>The facts are:</p> <ol style="list-style-type: none"> <li>1 The site is large at 12.8 acres. It is a potential invaluable resource.</li> <li>2 The land is in private ownership. Therefore it is only capable of use by groups at the discretion of the owners. Designating it as a Local Green Space will not alter this.</li> <li>3 The sports facilities are basic. With investment and open access far more people could access high quality facilities.</li> <li>4 The land makes very little contribution to the meaningful character of the area because the majority of the site is screened from view.</li> <li>5 The site does not contribute beneficially for the purposes of open space provision because it is private land and because it does not have an open visual aspect at street level. In fact the area to the South West of the land is identified as poorly provided with public open space in the current Local Plan.</li> <li>6 Without public access to the site and without a visual benefit through its lack of visual openness the site derives very little benefit to anybody.</li> <li>7 There is under provision for suitable accommodation for the aging population as stated in the Draft Local Plan (LP35 &amp; LP37), Quantum's proposals will help address this.</li> <li>8 Quantum propose to provide homes for the elderly that will be available under an affordable housing model, which will in turn free up family homes, helping to address the current housing crisis.</li> <li>9 Designating this land as Local Green Space, which will in turn deny the provision of community sporting and recreation facilities, will fail to support the needs of the community under proposed Local Plan policies, making the plan unsound.</li> </ol> <p>With the right imagination and control, the site clearly could be used in a way that would benefit many more than it presently does.</p> <p>Having read the representations of Quantum Group</p>	<p>Udney Park Playing Fields (which is not the correct name for the site) should be removed from the proposals map as a site that should be designated as Local Green Space.</p> <p>No one in the community will benefit from this designation.</p> <p>New Site allocation ref 475 should be proposed on this land instead which will be a socially beneficial development. I find it extraordinary that no one from the council has consulted the community on this matter. I must take this opportunity to stress that the application for the designation of this site to be made 'Local Green Space' is not representative of the views of the community. No one will benefit from this other than those who live around the site.</p> <p>This is not wanted as no one in the community will benefit other than the privileged few who live directly next to the site and enjoy the view over private land.</p> <p>If Local Green Space designation were to come into place it will be directly responsible for denying residents of Teddington publically owned, accessible sports pitches and open space which we have never had on this land.</p> <p>Whilst wholesale development of the site is inappropriate, I strongly support the new allocation put forward by the current owners in the last round of representations which will indeed give us what we want (Reference 475). This could deliver real social benefit, securing the future of the site and opening it up to the whole community, for everyone and preventing this incredibly important, but currently wasted, community asset from continuing to be a private enclosure for a privileged few.</p>	See Officer response to Comment ID 4 above.
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to the initial draft Local Plan Consultation, and seen the proposals for the land at the public exhibition held in December 2016, it is obvious that careful and sensitive development on a portion of the site could deliver meaningful and substantial benefits that are long lasting for a good proportion of the Borough's population.

The proposal to build on a small amount of the land that will deliver much needed accommodation – be this elderly care, community facilities such as doctors surgeries etc. – whilst also providing the financial receipt which would be large enough to re-design and re-equip the space to meet a range of formal and informal sport and leisure uses is a sustainable development and beneficial to majority of the Borough's population and not just a privileged few.

The creation of a Community Interest Company to own and manage the space in the public's interest will ensure community ownership and unfettered use by the public on the land not developed on. It is a requirement that the application for Local Green Space is made by the community. I am a local resident of Teddington and I was not consulted on this application. The groups that made this application are only representative of a very small part of the local community and certainly do not represent my views.

I see the potential of how sensitive development of the site can help me and people like me in the local community. Therefore I think a better approach is to not designate the land as Local Green Space but to ensure that policy will not stop acceptable and beneficial proposals from coming forward.

The application for Local Green Space was made by a group of people who want to retain the status quo of an underutilised piece of land because they do not want change. I am adamant it is unreasonable to think only of one's self and take the position of a NIMBY. This is what has led us to the housing crisis we currently face. A balanced view weighing the pro and cons of options and proposals is needed.

Retention of open space is an exceptionally important part of making urban areas liveable and bearable. Open space provides opportunities to use land for sport or recreation, critical components of an enjoyable healthy life. Open space can also be fundamental to the character of an area. But, if open space is not being used for such purposes,

										<p>then it is a wasted resource not helping anybody, other than perhaps those fortunate select few that live nearby, by ensuring their streets remain quiet. In London, where there is ever increasing pressure for more housing, for more elderly care facilities, etc. failing to utilise land efficiently is not in the interests of the community and is in fact prejudicing people's life chances.</p> <p>In the current London housing context seeking to preserve the status quo, and to ensure that the site cannot be used for anything else can only be for the benefit of those people who live in the houses immediately surrounding the land.</p> <p>The council should act for the benefit of all its residents not just these few.</p>		
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48	36	Mrs Burnham	Local Green Space - Udney Park Playing Fields, Teddington Proposals Map Changes: Page number(s): 3 & 4 Publication Local Plan: Page number(s): 54-58 Paragraph number(s): 5.2 and 5.3 (and their sub-paragraphs) Policy no./name: LP13 and LP14. Other: Chapter 12 - Comments in relation to other sites / site omissions. Ref: 475 - Allocation of new site - Former Imperial College Private Ground, Udney Park Road, Teddington	No	Yes	Yes	Yes	Yes	I am fully supportive of the proposals that Quantum Group has put forward for the playing fields on Udney Park Road. Their plan to build accommodation for older people and to let the community have use of the ground for sporting and other activities is an excellent idea. It is something that everyone of all ages will benefit from. There is a shortage of suitable homes for older people in the area, and this week there have been news reports about the housing crisis across the UK. Quantum's proposals are addressing something that is actually needed. If this land is designated Local Green Space (as stated in the map changes), then the council could be seen as not looking after the needs of its whole community, but instead just acting on the desires of a few local residents.	As stated in question 6, I do not feel that the Local Green Space designation is a fair representation of what local people need. I would like to see this removed from the Local Plan, and to see the new site allocation (ref 475) implemented in the interests of the whole community.	See Officer response to Comment ID 4 above.
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49	305	Omar White	Local Green Space - Udney Park Playing Fields, Teddington Proposals Map Changes: Page number(s): 3 & 4 Other: Chapter 12 - Comments in relation to other sites / site omissions. Ref: 475 - Allocation of new site - Former Imperial College Private Ground, Udney Park Road, Teddington	No		Yes	Yes		I work for a local company in Teddington and I believe we need to maximise every opportunity we can to ensure that the local community are looked after whether that is local elderly residents, families or young people. I think the Local Plan should not allow Udney Park playing fields to be designated as Local Green Space as this will only restrict the use of the land even further and make it even harder for local people to enjoy a very valuable local space. Space in London and the suburbs must be valued and used to the benefit of everyone rather than a select few. We have a housing crisis, an increasingly obese population and GP practices which are overstretched. Quantum's proposals seem to help address all of these issues.	No one from the Council has contacted me about the Local plan and I do not feel I have been consulted on this matter. Making the site at Udney Park Road Local Green Space does not represent the views of the local community rather a few people who live near the site and want to try and keep things the way they have always been which is to only allow a few people to use the site. I think Quantum's proposals (ref 475) should be approved.	See Officer response to Comment ID 4 above.
50	218	Tom Perry	Local Green Space - Udney Park Playing Fields, Teddington Proposals Map Changes: Page number(s): 3 & 4 Other: Chapter 12 - Comments in relation to other sites / site omissions. Ref: 475 - Allocation of new site - Former Imperial College Private Ground, Udney Park Road, Teddington	No		Yes	Yes		The Richmond Local Plan proposes that the playing fields at Udney park Road in Teddington are to be made local green space, and this is something that I strongly object to. I have seen what the developers (Quantum) have in mind for this site, and I think this is a better idea by far. I read every day in the news that there is a housing crisis, and a shortage of places to live for older people. Also, there are so many reports of obesity and ill health due to lack of exercise. If the Government is encouraging us to bit fit and healthy, then our own borough should be doing all it can too! So, for the sake of our children and future generations, let's see sense and do the right thing. Designating this land as local green space would be detrimental to people who live locally. I am in support of what Quantum wants to achieve, as it will open up opportunities for many people.	The new site allocation put forward by Quantum (ref 475) should be implemented, and the current recommendation for local green space should be removed from the Local Plan.	See Officer response to Comment ID 4 above.

51	133	Martin & Elizabeth Johnson	Local Green Space - Udney Park Playing Fields, Teddington Proposals Map Changes: Page number(s): 3 & 4 Other: Chapter 12 - Comments in relation to other sites / site omissions. Ref: 475 - Allocation of new site - Former Imperial College Private Ground, Udney Park Road, Teddington	No	No		Yes	Yes		We do not support the changes made to the Local plan policy where the land at Udney Park Road is to be designated as Local Green Space. We support the approach proposed by Quantum Group to provide a Continuing Care Retirement Community on a portion of the site and open up the majority of the site for sporting, recreational and community use.	Udney Park Playing Fields (which is not the correct name for the site) should be removed from the proposals map as a site that should be designated as Local Green Space. No one in the community will benefit from this designation.  New site allocation ref 475 should be proposed on this land instead which will be a socially beneficial development	See Officer response to Comment ID 4 above.
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52	170	Gerry McCarthy	Local Green Space - Udney Park Playing Fields, Teddington Proposals Map Changes: Page number(s): 3 & 4 Other: Chapter 12 - Comments in relation to other sites / site omissions. Ref: 475 - Allocation of new site - Former Imperial College Private Ground, Udney Park Road, Teddington	No	Yes	Yes	<p>I do not support the proposal to change the designation to Local Green Space (item 2.2.1 on the proposals map). I should like to point out that the Friends of Udney Park Playing Fields and The Teddington Society do not represent the views of all local residents, however vociferous they are. I am a local resident and was not consulted on this application.</p> <p>I certainly do not advocate that the site is over-developed, as that would create huge traffic and parking problems and would be out of character for the area. However, the proposals put forward by Quantum demonstrate that they have taken into account the sensitivities of building a development in the middle of a town.</p> <p>Sufficient underground parking will be provided, and the gardens and open spaces will be an attractive asset to the town. The development will result in the provision of much-needed retirement homes, whilst securing the majority of the site for the use of the community. The land was previously privately owned and was not available for everyone to use. Quantum's proposal will mean that everyone has the opportunity to use the public open space, as well as providing facilities for local associations and other groups. We are fortunate in Teddington to have a thriving community with a diverse range of activities on offer organised by local sporting and cultural groups, amongst others. However, there is a shortage of venues for some of these activities to take place. It is reassuring to know that the use of the community facilities will be managed by a Community Interest Company who will of course be mindful of local residents' interests and needs.</p> <p>It is clear from the proposals presented at the exhibition held in December 2016 that the development will provide clear benefits to the community. We need more assisted accommodation for our elderly residents, and providing support for them in this way will result in more homes being freed up in the locality, which will undoubtedly help the current housing problems.</p> <p>If the Local Green Space designation is approved, it will mean that no-one will be able to use the ground, which would be a waste of a valuable</p>	<p>Local residents have not been consulted on the application to turn this area into Local Green Space. The two groups currently involved in this (Friends of Udney Park Playing Fields and The Teddington Society) do NOT represent the whole community.</p> <p>The Udney Park site should not be included in the proposals map as one which should be designated Local Green Space. I wholly support the new allocation proposed by Quantum (ref 475), as this will be of huge benefit to the local community both in terms of providing accommodation for the elderly, but also opening up the current private grounds to everyone in the area.</p>	See Officer response to Comment ID 4 above.
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resource. If it is approved, the only people to benefit are the residents who live immediately around the site.

I feel that the proposed development will be of benefit to everyone living in Teddington. I therefore support the proposal by Quantum to provide retirement homes on part of the site, with the remaining majority being made available for the community to use.

53	37	Ian Butcher	<p>Local Green Space - Udney Park Playing Fields, Teddington Proposals Map Changes: Page number(s): 3 &amp; 4</p> <p>Other: Chapter 12 - Comments in relation to other sites / site omissions. Ref: 475 - Allocation of new site - Former Imperial College Private Ground, Udney Park Road, Teddington</p>								<p>I am writing to object to the proposals in the Richmond Local Plan regarding the changes to the playing fields on Udney Park Road - "reason for Local Green Space Designation."</p> <p>In the absence of any real alternative suggestions should the designation change, I am encouraged to side with Quantum whose overall scheme merges a certain amount of development in the public interest with the preservation of sports activities which benefit the local community and have done so for many years. In terms of the site area, the proportion of building development to leisure space is very reasonable in my view being approx. a third. Quantum have been very insistent that they wish to balance their development of much needed homes for the elderly along with medical facilities for the hard pressed Park Surgery along with sports facilities and leisure activities for local people. The sports clubs involved have a constructive on-going dialogue with Quantum who are offering very generous arrangements and facilities for continuing the activities which have become a tradition now on the site. And as I understand it will be in perpetuity.</p> <p>The danger being run is that, should the designation change, Quantum would be perfectly within their rights to close the site and leave it to the mercy of the fly tippers the foxes and shoulder high weeds.</p>	<p>Please remove the designation for Local Green Space in the map changes, as I cannot see any sound reason for this being of any use, now and in the future. The Quantum Group proposals are far more appropriate for the community, and therefore I request that these are accepted as my preferred alternative.</p>	<p>See Officer response to Comment ID 4 above.</p>
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55	175	Mike McMinn	Local Green Space - Udney Park Playing Fields, Teddington Proposals Map Changes: Page number(s): 3 & 4 Other: Chapter 12 - Comments in relation to other sites / site omissions. Ref: 475 - Allocation of new site - Former Imperial College Private Ground, Udney Park Road, Teddington	No	Yes	Yes	<p>Udney Park Playing Fields (which is not the correct name for the site) should be removed from the proposals map as a site that should be designated as Local Green Space. No one in the community will benefit from this designation.</p> <p>New Site allocation ref 475 should be proposed on this land instead which will be a socially beneficial development.</p> <p>Having read the representations of Quantum Group to the initial draft Local Plan Consultation, and seen the proposals for the land at the public exhibition held in December 2016, it is obvious that careful and sensitive development on a portion of the site could deliver meaningful and substantial benefits that are long lasting for a good proportion of the Borough's population.</p> <ul style="list-style-type: none"> <li>• The proposal to build on a small amount of the land that will deliver much needed accommodation – be this elderly care, community facilities such as doctors surgeries etc. – whilst also providing the financial receipt which would be large enough to re-design and re-equip the space to meet a range of formal and informal sport and leisure uses is a sustainable development and beneficial to majority of the Borough's population and not just a privileged few.</li> <li>• The creation of a Community Interest Company to own and manage the space in the public's interest will ensure community ownership and unfettered use by the public on the land not developed on.</li> <li>• It is a requirement that the application for Local Green Space is made by the community. I am a local resident of Teddington and I was not consulted on this application. The groups that made this application are only representative of a small part of the local community and certainly do not represent my views.</li> <li>• I see the potential of how sensitive development of the site can help me and people like me in the local community. Therefore I think a better approach is to not designate the land as Local Green Space but to ensure that policy will not stop acceptable and beneficial proposals from coming forward.</li> <li>• I recognise that we must provide for the needs of the population and our own sons and daughters and future needs of their families. We have failed to do this and it is why we have both a housing crisis and an elderly care time bomb. I am certain that meeting the unmet need can only be achieved through building new homes and facilities, by</li> </ul>	<ul style="list-style-type: none"> <li>• I find it extraordinary that no one from the council has consulted the community on this matter. I must take this opportunity to stress that the application for the designation of this site to be made 'Local Green Space' is not representative of the views of the community. No one will benefit from this other than those who live around the site.</li> <li>• This is not wanted as no one in the community will benefit other than the privileged few who live directly next to the site and enjoy the view over private land.</li> <li>• If Local Green Space designation were to come into place it will be directly responsible for denying residents of Teddington publically owned, accessible sports pitches and open space which we have never had on this land.</li> <li>• Whilst wholesale development of the site is inappropriate, I strongly support the new allocation put forward by the current owners in the last round of representations which will indeed give us what we want (Reference 475). This could deliver real social benefit, securing the future of the site and opening it up to the whole community, for everyone and preventing this incredibly important, but currently wasted, community asset from continuing to be a private enclosure for a privileged few.</li> </ul>	See Officer response to Comment ID 4 above.
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56	53	Christine <b>Craik</b>	Local Green Space - Udney Park Playing Fields, Teddington Proposals Map Changes: Page number(s): 3 & 4 Other: Chapter 12 - Comments in relation to other sites / site omissions. Ref: 475 - Allocation of new site - Former Imperial College Private Ground, Udney Park Road, Teddington	No	Yes	Yes	<p>I have taken great interest in and attended two exhibitions hosted by Quantum at the former ICL private ground to review their proposals to develop the site. Quantum have carefully considered local needs and I believe their proposals should be supported by the local council. Their proposal will deliver much needed accommodation for elderly care ((LP35 &amp; LP37), whilst also providing an opportunity for local people to participate in a variety of sports and a community hub for residents to access in line with proposed policies L28, LP30, LP31).</p> <p>If the local council designate the grounds as Local Green Space my concerns are that Quantum will not be able to develop the site and therefore no one will be able to access or use it. A valuable piece of land in an urban area will become abandoned and a potential eye sore for the foreseeable future! With limited space available in Teddington we need to ensure this land is utilised rather than under-utilised. There is a great shortage of suitable residential accommodation for older people and Quantum's proposals are much needed.</p> <p>As a local resident of Teddington I was not consulted on this application and I believe the Local plan does not represent my views.</p>	<p>I do not feel the Local plan is legally compliant or sound as I do not believe London Borough of Richmond upon Thames has consulted with the community sufficiently. It would seem that the council are not considering the views of the wider community. I strongly support the new allocation put forward by the current owners of the site (reference 475).</p>	See Officer response to Comment ID 4 above.
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57	111	Dan Henderson	Local Green Space - Udney Park Playing Fields, Teddington Proposals Map Changes: Page number(s): 3 & 4 Other: Chapter 12 - Comments in relation to other sites / site omissions. Ref: 475 - Allocation of new site - Former Imperial College Private Ground, Udney Park Road, Teddington	No	Yes	Yes		I do not support the changes made to the Local Plan policy where the land at Udney Park Road is to be designated as Local Green Space. I support the approach proposed by Quantum Group to provide a Continuing Care Retirement Community on a portion of the site and open up the majority of the site for sporting, recreational and community use.	Udney Park Playing Fields (which is not the correct name for the site) should be removed from the proposals map as a site that should be designated as Local Green Space. No one in the community will benefit from this designation. New Site allocation ref 475 should be proposed on this land instead which will be a socially beneficial development.	See Officer response to Comment ID 4 above.
58	48	Rob Clarke	Local Green Space - Udney Park Playing Fields, Teddington Proposals Map Changes: Page number(s): 3 & 4 Other: Chapter 12 - Comments in relation to other sites / site omissions. Ref: 475 - Allocation of new site - Former Imperial College Private Ground, Udney Park Road, Teddington	No	Yes	Yes		I work for a company on Teddington High Street and have heard about the Udney Park Road Playing Fields recently. I do not agree with the Local Plan designating this site as Local Green space as this will stop even a small amount of development on the site forever which is not realistic now the site has been purchased by a developer. If the developer is unable to build anything on the site, then no one will benefit and my concerns are what will happen to the land then? Will it just become more and more run down and if no one can access it what a waste for everyone in the local community! Whether people approve of Quantum buying the land or not, the fact is they have and I think we have a duty to ensure the local community benefits as much as it can from any developments. It looks to me as if Quantum is trying hard to meet the residents of Teddington half way - by gifting a large portion of the site to a local community group who are setting up a Community Interest Company and also promising to build a new GP surgery and community hub. I think we should support the plans to build homes for older people.	I think the changes which need to be made to make the Local plan legal is to take making Udney Park Playing Fields Local Green Space. I think Quantum's plans (ref 475) should be given serious consideration as this will give the community what it needs and what it wants! I think it is a few people who are not happy about their view changing/the use of land changing and they have been the most vocal but they DO NOT represent the Teddington Community as a whole!	See Officer response to Comment ID 4 above.

59	192	Chantel Mullix	Local Green Space - Udney Park Playing Fields, Teddington Proposals Map Changes: Page number(s): 3 & 4 Other: Chapter 12 - Comments in relation to other sites / site omissions. Ref: 475 - Allocation of new site - Former Imperial College Private Ground, Udney Park Road, Teddington	No	Yes	Yes			I work for a local company in Teddington and I believe we need to maximise every opportunity we can to ensure that the local community are looked after whether that is local elderly residents, families or young people. I think the Local Plan should not allow Udney Park playing fields to be designated as Local Green Space as this will only restrict the use of the land even further and make it even harder for local people to enjoy a very valuable local space. Space in London and the suburbs must be valued and used to the benefit of everyone rather than a select few. We have a housing crisis, an increasingly obese population and GP practices which are overstretched. Quantum's proposals seem to help address all of these issues.	No one from the Council has contacted me about the Local plan and I do not feel I have been consulted on this matter. Making the site at Udney Park Road Local Green Space does not represent the views of the local community rather a few people who live near the site and want to try and keep things the way they have always been which is to only allow a few people to use the site. I think Quantum's proposals (ref 475) should be approved.	See Officer response to Comment ID 4 above.
60	17	Philip Barnes	Local Green Space - Udney Park Playing Fields , Teddington	Yes	Yes	Yes				I consider the Local Plan is legally compliant particularly as regards Udney Park Playing Fields designation as Local Green Space. In particular, the site was submitted by the local community, there is no current planning permission on the site which would be contrary to the site's designation as LGS, it is not land allocated for development and the land is not extensive. Designation as LGS would help protect all of this site for sports use. The speculative developer who wants to build on the land is doing so to provide a profit for its shareholders. That is not something which the Council should sacrifice this designation of LGS to support.	Support welcomed. No changes required.

61	238	Christopher Marlow, Revolution Tennis	Local Green Space - Udney Park Playing Fields, Teddington Proposals Map Changes: Page number(s): 3 & 4 Publication Local Plan: Page number(s): 54-58 Paragraph number(s): 5.2 and 5.3 (and their sub-paragraphs) Policy no./name: LP13 and LP14. Other: Chapter 12 - Comments in relation to other sites / site omissions. Ref: 475 - Allocation of new site - Former Imperial College Private Ground, Udney Park Road, Teddington	No	Yes	Yes	Yes	Yes	<p>This representation is made by Revolution Tennis on behalf of 5 people involved with us and who have agreed with our position. Revolution Tennis is Tennis Service Provider</p> <p>Our interest in this site is through my role on the board of advisors for Teddington Community Sports Ground Community Interest Company (TCSG CIC), a CIC set up by local community leaders and chaired by Sir Vincent Cable. Revolution Tennis is also hoping to use new tennis facilities to be provided as part of the proposals by current owners, Quantum, to deliver tennis coaching for local residents in Teddington.</p> <p>The playing fields on Udney Park Road has always been a private facility. The grounds currently have a multi-use games area, which caters for tennis and other sports such as netball. This facility has only ever been used by a privileged few and has never been a public asset. We have reviewed Quantum's proposals, which include tennis courts that will be made available to the local community, and feel strongly that sensitive development on a portion of the site is appropriate given the number of community benefits that will be delivered as a result.</p> <p>Benefits Quantum's proposals will deliver include:</p> <ul style="list-style-type: none"> <li>- Gifting the majority of the land to the newly formed Teddington Community Sports Ground Community Interest Company (TCSG CIC), making previously private land available to everyone in the community.</li> <li>- New public open space to enrich the lives, health and well-being of residents and visitors. - Enhanced play and sporting opportunities for all ages and abilities.</li> <li>- Space for local groups and community activities.</li> <li>- Modern, multi-use facilities to meet the needs of local clubs and associations. - Affordable housing solutions for the elderly population – freeing up much needed family housing.</li> <li>- New publically accessible healthcare and GP services and employment opportunities.</li> <li>- A sustainable and protected legacy for future generations.</li> </ul> <p>Revolution Tennis do not want the former Imperial College London Private Ground designated as Local Green Space. We agree with the position TCSG CIC</p>	<p>The 'Udney Park Playing Fields' (as noted in page 3&amp;4 of the Map Proposal Changes document but is, in fact, not the correct name) site should not be designated as Local Green Space. No one in the community will benefit from this designation. New Site allocation ref 475, as submitted by current owners Quantum to previous rounds of the Local Plan consultation, should be proposed on this land instead which will be a socially beneficial development.</p> <p>If Local Green Space designation were to come into place it will be directly responsible for denying residents of Teddington publically owned, accessible sports facilities and open space which we have never had on this land.</p>	<p>See Officer response to Comment ID 4 above.</p> <p>It should be noted that the designation as a Local Green Space does not prevent the site's continued use for sport purposes and as a playing field. Indeed, the Local Plan and its policies encourage improved and enhanced facilities for outdoor open space and sport use, as set out in Policy LP 31.</p>
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										<p>have taken, where they support the proposal that is being promoted by Quantum through their Local Plan representations made in previous rounds of the consultation (ref no 475).</p> <p>We do not feel designating this site as Local Green Space is justified – it is not within the public interest. Quantum Group have a proposal for the site that would provide meaningful benefits to the wider community as noted about, which we feel outweigh any impact of building on a portion of open space.</p>		
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62	50	Eileen <b>Cooper</b>	Local Green Space - Udney Park Playing Fields, Teddington Proposals Map Changes: Page number(s): 3 & 4 Other: Chapter 12 - Comments in relation to other sites / site omissions. Ref: 475 - Allocation of new site - Former Imperial College Private Ground, Udney Park Road, Teddington	No		Yes	Yes		<p>I am a local resident of Teddington and have been aware of the controversy regarding Udney Park playfield fields over the past year or so. I have kept a watchful eye on the debate and now wish to formally object to the Richmond Local plan and it's intentions to make the playing fields Local Green Space. I believe Quantum's plans are sound and that their plans should be approved or at least strongly considered - they are trying to support our local community in a variety of ways, by providing sporting facilities, a community space and much needed homes. I know several people locally who are looking to downsize and/or for somewhere they can live with additional support as and when required.</p> <p>Having lived in the local community for some time, it is my experience that this site was only ever used by a "chosen few" rather than access being available to the wider community. We MUST take this opportunity to ensure that everyone can enjoy the space and maximize the use of this under utilised land.</p> <p>I strongly oppose the Local plan.</p>	<p>I see the potential of how sensitive development of this site can help many people in the local area. We must provide adequate housing for our growing elderly population and in turn, for future generations and I do not believe that designating this land as Local Green Space helps anyone!</p>	See Officer response to Comment ID 4 above.
63	243	Adam <b>Rowlands</b>	Local Green Space - Udney Park Playing Fields, Teddington Proposals Map Changes: Page number(s): 3 & 4 Other: Chapter 12 - Comments in relation to other sites / site omissions. Ref: 475 - Allocation of new site - Former Imperial College Private Ground, Udney Park Road, Teddington						<p>I believe that Udney Park Playfield Fields should be removed from the proposal map as a site that should be designated as Local Green Space. I fail to see how anyone in the community will benefit if the new designation is adopted.</p> <p>I have spoken to Quantum about their proposals and I think it is a really good mix of residential homes for older people, sporting facilities which can benefit the whole community along with a new health centre and community hub. The playingfields currently are not very well laid out, where much space is wasted, and in the past ft has been under utilised. The clubhouse is also in much need of being updated. I think any plans for the site going forwards should enable as many people in Teddington as possible to benefit and enjoy the site (which has not been the case in the past!). Quantum's proposals will do this with the elderly care and retirement living, public sporting facilities, community facilities and public open space.</p>	<p>I strongly support the allocation being put forward by Quantum (ref 475) and believe if the site was designated Local Green Space in the Local plan that it will deny local people access to sports pitches, open spaces and homes which we so desperately need.</p>	See Officer response to Comment ID 4 above.

64	254	Hashan Sharif	Local Green Space - Udney Park Playing Fields, Teddington Proposals Map Changes: Page number(s): 3 & 4 Publication Local Plan: Page number(s): 54-58 Paragraph number(s): 5.2 and 5.3 (and their sub-paragraphs) Policy no./name: LP13 and LP14. Other: Chapter 12 - Comments in relation to other sites / site omissions. Ref: 475 - Allocation of new site - Former Imperial College Private Ground, Udney Park Road, Teddington	No	Yes	Yes	Yes	Yes	<p>The plan is unsound as there are proposals being put forward that should not be when there is a suitable alternative that is far better for the local community.</p> <p>I am specifically referring to the land at Udney Park Road that is proposed to be designated as Local Green Space.</p> <p>I do not want to see this designation go ahead as it will directly be responsible for denying the local community of many benefits such as public open space, sports facilities, elderly care and retirement living and health facilities, which I am particularly interested in.</p> <p>I am connected to the local pharmacy and know how desperate the local surgery need a new facility that is fit for purpose. This will benefit everyone in the local community and it would be a real shame if it could not happen because of this designation.</p>	<p>I wish to see Quantum's representation to the previous round of Local Plan consultation (ref 475) implemented and the current local plan designation for local green space removed. The reason for this is that Quantum's representation will bring immediate benefits for ALL the community, and not just for a small number of residents. Providing a doctors surgery alone will benefit over 13,000 registered patients in the local area.</p>	See Officer response to Comment ID 4 above.
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65	269	Sheila Stanley	Local Green Space - Udney Park Playing Fields, Teddington Proposals Map Changes: Page number(s): 3 & 4 Publication Local Plan: Page number(s): 54-58 Paragraph number(s): 5.2 and 5.3 (and their sub-paragraphs) Policy no./name: LP13 and LP14. Other: Chapter 12 - Comments in relation to other sites / site omissions. Ref: 475 - Allocation of new site - Former Imperial College Private Ground, Udney Park Road, Teddington	No	Yes	Yes	I am writing to express my concerns about the content of the Richmond Local Plan. In the Map Changes Proposals it states that the old Imperial College Playing fields on Udney Park Road is to be designated to local green space. It is all very well having an area dedicated to local green space (re: Richmond Local Plan, Udney Park Road Playing Fields), but it's not much use to us as a community when we have more pressing issues. As a retired resident, I was very excited about Quantum's plans to build a retirement community on this ground. There has been a lot of speculation about what is going on, so I was pleasantly surprised to see that they have the interests of the community in mind. I would very much be interested in living somewhere like this; so much so that I have already registered my interest! I fully support the designation that Quantum has put forward it is something that we will all benefit from.	I object to the area being designated as Local Green Space. If this was allowed, then you are effectively denying the people of Teddington something that they have never had and are entitled to. The site allocation put forward by the developers is what I would like to see implemented.	See Officer response to Comment ID 4 above.
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66	35	Mr Burnham	Local Green Space - Udney Park Playing Fields, Teddington Proposals Map Changes: Page number(s): 3 & 4 Publication Local Plan: Page number(s): 54-58 Paragraph number(s): 5.2 and 5.3 (and their sub-paragraphs) Policy no./name: LP13 and LP14. Other: Chapter 12 - Comments in relation to other sites / site omissions. Ref: 475 - Allocation of new site - Former Imperial College Private Ground, Udney Park Road, Teddington	No	Yes	Yes	Yes	Yes	I do not consider the designation of Local Green Space to be beneficial to the many people who live in our area. If this goes ahead, then it will be a waste of a piece of land that could be put to a far better use. I support Quantum's plans for sports and community space that they will provide, along with some retirement accommodation. Only a limited number of people had access to the playing fields when they were owned by Imperial, and I think that Quantum's plans will enable the whole community to enjoy some much needed facilities. We have a genuine need in the area for elderly housing, as well as a place that people of all ages can play sport and take part in other activities.	I would like to see the designation for Local Green Space removed from the Local Plan and changed to the new site allocation (ref 475).	See Officer response to Comment ID 4 above.
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67	261	Andy Sutch, <b>Sport Richmond</b>	Local Green Space - Udney Park Playing Fields, Teddington																																			
													<p>I am writing in my capacity as Chair of Sport Richmond to submit a view agreed by Sport Richmond on the future Community Use of Udney Road PF in the context of the Local Plan Review.</p>	<p>Sport Richmond would prefer that any proposed change to the designation of this site's land use in the current Borough Local Plan Review does not impair the achievement of the above goals, as securing additional capacity for sport and recreation in the Borough should remain a target for all stakeholders.</p>	<p>Comments noted, particularly in relation to Sport Richmond's default opposition to the loss of playing fields, which is in line with the policies set out in the Local Plan, such as Policy LP 31 and the proposed Local Green Space designation, as well as in national policy and guidance, including that produced by Sport England.</p>																							
													<p>Sport Richmond has a default opposition to the loss of playing fields unless the 5 Sport England exemptions are met namely no proven need, replacement to a similar standard, more intensive sport and leisure use e.g. All weather pitch, direct ancillary provision e.g. Pavilion or no met loss of pitches e.g. Fringe development that does not impact on the number and quality of pitches.</p>																									
													<p>This default will remain as Sport Richmond policy in the foreseeable future</p>																									
													<p>Sport Richmond recognises that this long-standing local sport facility has changed ownership and continued sport use is no longer guaranteed. The future use of the site currently being debated by the new owners, local residents and interested parties including local sports clubs. It is noted that the physical facilities whilst currently in temporary use, are outdated, not accessible and require investment. Sport Richmond considers this site to be a significant sporting provision in the Borough and would welcome any proposals to secure long-term open sport and community use, on the basis of achieving the following;</p>																									
													<p>1. A sustainable sports facility is created on the site with a minimum of two full sized pitches plus an all-weather artificial multi-sport surface with floodlighting.</p>																									
													<p>2. Improved tennis courts/multi-activity fenced sports area.</p>																									
													<p>3. A new accessible clubhouse/community centre, constructed to the required Sport England design standard.</p>																									
													<p>4. A contribution is made to another off-site Borough cricket facility to replace the lost cricket square here if this is not to be re-instated.</p>																									
													<p>5. Additional community use on site with informal recreation benefits assuming this does not compromise the sports provision above.</p>																									
													<p>6. A satisfactory legal arrangement to guarantee sport and community use on the site for a minimum term of 25 years if not in perpetuity. We consider that a correctly constituted Community Investment Company could be a suitable vehicle to deliver the above goals.</p>																									
															<p>It should be noted that the designation as a Local Green Space does not prevent the site's continued use for sport purposes and as a playing field. Indeed, the Local Plan and its policies encourage improved and enhanced facilities for outdoor open space and sport use, as set out in Policy LP 31.</p>																							
															<p>Also see Officer response to Comment ID 4 above.</p>																							

69	216	Julie Perry	Local Green Space - Udney Park Playing Fields, Teddington Proposals Map Changes: Page number(s): 3 & 4 Other: Chapter 12 - Comments in relation to other sites / site omissions. Ref: 475 - Allocation of new site - Former Imperial College Private Ground, Udney Park Road, Teddington	No	Yes	Yes				I am familiar with the Udney Park Road playing fields, and have seen the plans that Quantum, the new owners have put forward. This land has always been privately owned with very few people having access to it, and I think that their ideas to build on a small part of the land for the elderly, and allow the community to enjoy the most of it are extremely positive. If the land is designated as open green space as stated in Local Plan, this would put a stop to the very innovative and thoughtful plans that Quantum has presented. Therefore, I object to the local green space idea, and fully support Quantum's plans for a Continuing Care Retirement Company and the opening of the site for recreational, sport and leisure.	Please remove the local green space designation in the current plan. I would like to see Quantum's representation of a new site allocation (ref 475) adopted as this will be far more beneficial in the long term for the whole community.	See Officer response to Comment ID 4 above.
70	97	Katarina Hagstrom	Local Green Space - Udney Park Playing Fields, Teddington Page number(s): 3 & 4 Map(s): 2.2.1	Yes	Yes	Yes				f	No changes.	Support welcomed. No changes required.

71	132	Jill Jackson	Local Green Space - Udney Park Playing Fields, Teddington Proposals Map Changes: Page number(s): 3 & 4 Other: Chapter 12 - Comments in relation to other sites / site omissions. Ref: 475 - Allocation of new site - Former Imperial College Private Ground, Udney Park Road, Teddington	No	Yes	Yes	<p>I do not agree with the site on Udney Park Road becoming designated as Local Green space.</p> <p>I can see the potential of Quantum's ideas and plans and how they can help me and people like me by providing housing for older people along with sporting and health facilities. This site has always been used by a few local people and Quantum's plans will enable more people from the local community to benefit and enjoy the space in a variety of ways. I approve of Quantum's plans to set up a Community Interest Company so ensure community ownership and manage the space in the future. By designating the land local green space it will deny the provision of community sports and deny access to much needed housing for older people in Teddington.</p>	<p>I believe Quantum's proposals (ref 475) will deliver tangible benefits to the local community and ensure the future of the site. It is sad that such a wonderful piece of land in the heart of Teddington has been under utilised by the community for so long and I think the Council should grasp this wonderful opportunity to provide much needed housing along with new facilities to support the local community.</p>	See Officer response to Comment ID 4 above.
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72	142	Martyn Kingsford	Local Green Space - Udney Park Playing Fields, Teddington Proposals Map Changes: Page number(s): 3 & 4 Publication Local Plan: Page number(s): 54-58 Paragraph number(s): 5.2 and 5.3 (and their sub-paragraphs) Policy no./name: LP13 and LP14. Other: Chapter 12 - Comments in relation to other sites / site omissions. Ref: 475 - Allocation of new site - Former Imperial College Private Ground, Udney Park Road, Teddington	No	Yes	Yes	Yes	Yes		<p>The Plan by implying that the whole of the Udney Park Road playing fields are to be protected as open space takes away any consideration of the better use of the land to provide IMPROVED playing fields AND much needed homes for an aging population in Teddington.</p> <p>The Plan is not sound because it pre-empts any future uses of this community asset and in effect freezes any consideration for over 15 years. The plan is not sound because it does not recognise National Policy recently set out in the Government's Housing White Paper firstly to increase housing supply and make better use of the Green Belt and other open spaces. There is, as set out in the draft plan, an urgent need to house an ageing population and as the White Paper states a need for greater provision for supported housing (and in Richmond's case for an aging population)</p> <p>The plan makes clear reference for the need to house an ageing population under the heading of housing need but the draft plan seems to work against housing need of the local ageing population in Teddington and the urgent need to increase the provision of social care locally. The Council recognises this urgent need in its literature but is creating a Plan of contradictions for this reason the plan is not sound</p> <p>The draft plan sets out in paragraphs 5.2.6 and 5.2.7 how the Council can support the proposals for Udney Park Road Playing Fields and yet retain the value of Metropolitan Open Space by enabling greater flexibility</p>	See Officer response to Comment ID 4 above.
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10	84	Keith Atkinson, Friends of Udney Park Playing Fields (FUPPF)	Local Green Space - Udney Park Playing Fields, Teddington Page number(s): 3 & 4 Map(s): 2.2.1	Yes	Yes	Yes					<p>We the undersigned overwhelmingly support the granting of Local Green Status to Udney Park Playing Fields.</p> <p>It is considered that all of the following required criteria have been met ie:</p> <p>The site has been submitted by the local Teddington community ie The Friends of Udney Park Playing Fields and the Teddington Society;</p> <p>There is no current planning permission which once implemented would undermine the merit of a Local Green Space designation;</p> <p>The site is not land allocated for development within the Local Plan;</p> <p>The site is local in character and is not an extensive tract of land;</p> <p>The site is within reasonably close proximity to the community it serves;</p> <p>Udney Park Playing Fields, the Local Green Space, is demonstrably special to the local Teddington community and holds a particular local significance, because of (a) its historic significance as a World War I Memorial Site for the Old Boys of Merchant Taylors School, because (b) of its historic donation by Lord Beaverbrook for the use of amateur sport in perpetuity, supported by deeds of covenant, and (c) especially because of its recreational value as a playing field for many varied local sporting bodies;</p> <p>The Local Green Space(LGS) designation for this site will provide protection additional to the existing protective policies such as OOLTI &amp; Asset of Community Value. Further the special characteristics of the LGS will enhance the site's protection better than through any other means.</p> <p>Throughout 2016 there was full consultation on the Local Plan by Richmond Council, due process, cooperation with the Teddington community and "soundness" . The LGS status of the site will ensure the entire 12.7 acres is available for wide community use and prevent inappropriate development thereon</p> <p>In June 2015, before the current owner bought the site, LBRUT Cabinet approved the statutory "Sport, Open Space and Recreation Needs and Opportunities Assessment including Playing Pitch Strategy". This is a detailed Assessment of supply and demand of critical outdoor community space, carried out independently by specialist consultants and following the prescribed Sport England methodology. Within that Assessment the Playing Pitch Strategy defines Udney Park Playing Fields as a "Strategic Site" that hence must NOT be built on"</p>	Support welcomed. No changes required.
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										<p>The following local community residents have signed the KEEP UDNEY A LOCAL GREEN SPACE Petition;</p> <p>Baroness Jenny Hilton, Jopling Family, Hilary Adamson, Janni van Minnen, Phil &amp; Louise Squire, Simon Warmer, Rachael Macpherson, Roger Richardson, Geoff Boyes, Ann Cornick, Barbara Woolley, Caroline Miskin, Hilary Teal, Paul Ashworth, David Lawton, Sally Howland, Helga Foss, Stewart Colley, Vicky Phillips, Mick and Liz Leyden, Phil &amp; Ailsa Lawrence, Haworth family, Dave Hobday, Veichmanis family, Sharples family, Sue Conder, Duncan Adamson, Keith &amp; Nancy Atkinson, Joanne McGuiggan, Tim Godfray, Lara Robinson, Robin &amp; Kaari Crees, Dilys Walker &amp; family, Martin Bridgewater, Gareth Bullock, Barnes family, Katey Peachey, Tracy Hurley, Jan Hughes, Robert &amp; Sayee Drake, David Poole, Simon Pinnell, Harpreet Robertson, Nadine Born, Jonathan Guppy, Wilma Ferguson, Clare &amp; Harry Mann, John Blackwell, Chris Goodwill, Odile Kasolowsky, Anne Peacock, Rachel &amp; John Webster, Diana Gillespie, Famille Delattre, Robert and Lynette Williams, Helene Elston, Annie Walder, Jack Nolan, Philip Ward, John &amp; Sarah Clapton, Vicky Barnes &amp; Joe Halford, Jessica Petelin, Martin Blaiklock, Philip &amp; Julia Downer, Paula Smith, Jenny Gilbert, Douglas &amp; Jacki Barrell, David Teague, Tom Kemp-Potter, Pieter Morpurgo, Derek Facer, Nina Leach, Ren Travers, Frances White, Lazlo Gresswell, Simon McClean, Susan Birchall, Stephen Hyett, Tim &amp; Triss Jones, Penny McQuater, Matt Ellis, Mercia Bullen, together with many more FUPPF Supporters</p>		
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74	1	Melanie Spencer, 3rd Teddington Scout Group	Local Green Space - Udney Park Playing Fields, Teddington Proposals Map Changes: Page number(s): 3 & 4 Other: Chapter 12 - Comments in relation to other sites / site omissions. Ref: 475 - Allocation of new site - Former Imperial College Private Ground, Udney Park Road, Teddington	No	Yes	Yes	<p><b>[see also Appendix 1 to this document for image included]</b></p> <p>I write as Executive Committee Chair of 3rd Teddington Scout Group and on behalf of 98 adults from 51 of our 55 member families. We have responses in writing/email from these adults specifically confirming their agreement with our rejection of the proposal to change the designation of the former Imperial College Private Ground on Udney Park Road, Teddington, from Other Open Land of Townscape Importance (OOLTI) to Local Green Space (LGS).</p> <p>We believe that the LGS designation does not comply with the Statement of Community Involvement nor with the criteria for designation of Local Green Space (Policy LP 13 Green Belt, Metropolitan Open Land and Local Green Space).</p> <p>Our reasons are:</p> <ul style="list-style-type: none"> <li>• The change in designation was not submitted by the local community. It was proposed by two special interest groups (Teddington Society/Friends of Udney Park Playing Fields) who had not canvassed all their members nor proactively approached the wider community. This lack of proportionate evidence makes the plan's proposal unsound.</li> <li>• The change in designation was not put out for public consultation and we only became aware of this at the time of the cabinet meeting to approve the plan in December 2016.</li> <li>• Despite written representations in the first Teddington Village Plan consultation supporting the proposal by the new owners of this PRIVATE land to gift 8 of the 12.8 acres to the community and representations from 6 people representing community groups and residents made AGAINST the LGS designation at the Cabinet Meeting to approve this version of the Local Plan, the council continued with its decision.</li> <li>• At no stage has the council nor Teddington Society discussed this designation change with the community and sports groups of Teddington that so urgently need facilities, despite being aware of our needs. Ironically, when we approached the Council Members/Cabinet Members/Teddington Society members/local MP and GLA councillor early last year for advice as our Scout Group was to be made homeless, the only potentially available site we were repeatedly directed to was the former</li> </ul>	<p>We reject the proposal to designate the former Imperial College private land on Udney Park Road as Local Green Space for the reasons mentioned in our answer to question 6. We ask that the LGS designation be removed from the proposals map and request that the land remain designated as Other Open Land of Townscape Importance (OOLTI).</p> <p>We believe that its OOLTI designation provides the right balance of control and criteria to retain as much openness of the site as possible while providing Teddington with a valuable public resource for community and sporting activities. We trust the council's planning process to ensure that the accompanying mixed use development will be measured while meeting the needs of the local area.</p> <p>Most importantly, the retention of OOLTI status would also enable ALL of Teddington's residents, and not just those linked to Teddington Society and FUPPF, to have a say in the use and development of this site through the council's planning process. This will enable the Local Plan to meet the criteria of the Statement of Community Involvement.</p> <p>Reverting to the OOLTI designation and enabling this mixed use development to proceed with careful controls will place the Local Plan in compliance its proposed policies for Social/Community Infrastructure; Health and Wellbeing and Joint Strategic Needs Assessment evidence; and Public Open Space, Sport and Recreation.</p> <p>We believe this is the best opportunity to secure and safeguard the majority of the private land for sustainable public use in perpetuity. This gifted land will only be possible as part of a sustainable mixed used</p>	<p>See Officer response to Comment ID 4 above.</p> <p>In addition, it should be noted that the designation as a Local Green Space does not prevent an element of the site, such as the pavilion or another small scale structure for which the policy may allow for exceptions in certain circumstances, being used for community uses and social infrastructure purposes. It should also be acknowledged that the OOLTI Policy LP 14 also requires the protection of land designated as OOLTI in open use, and the policy only allows for minor extensions or replacement facilities provided that it would not harm the character or openness of the open land. It is in the interest of the Council to assist the Teddington Scout Group in finding a suitable location and venue for their activities. This commitment is also set out in Policy LP 28 Social and Community Infrastructure, which states that the Council will work with service providers and developers to ensure the adequate provision of community services and facilities, especially in areas where there is an identified need or shortage. It should also be noted that it is not the role of the plan-making process to assess a potential development, such as that proposed by the Quantum Group, against the Local Plan, London Plan and national policies as this will have to be done as part of the normal planning application process.</p>
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									<p>Imperial College Private Ground and its new owner Quantum.</p> <ul style="list-style-type: none"> <li>• Despite its call to retain the entire site as playing fields, neither Teddington Society nor Friends of Udney Park Playing Fields (FUPPF) have explained how this private land would become publicly accessible playing fields and how the costs of maintaining the playing fields would be funded under the LGS designation. The Local Green Space criteria also states that the site must be DEMONSTRABLY special to a local community AND holds a particular local significance, for example, because of its recreational value (including as a playing field), etc.</li> <li>• Before Spring 2016, the site was only special for the view it offered some of the residents who live on its boundary. The land is private and was never open to the public.</li> <li>• The playing fields/clubhouse are now demonstrably special to a far greater number of Teddington families through the lease between new owners Quantum and local sport/community groups as evidenced by the hundreds of club members who have signed up to reject the LGS.</li> <li>• By designating the land LGS, the only thing that will be preserved is the view of an empty space it provides for some of those that live on its boundary (the majority of the site is screened from view). The land would go from occasional use to no use at all as the owners are under no obligation to allow public access to the site. It would remove the site's recreational value as playing fields as these would no longer be maintained or used.</li> <li>• The LGS designation directly robs Teddington of the opportunity for 8 acres of purpose built community and sporting facilities and public open space to be gifted in perpetuity by the owners of this private land. This gift would be managed by a Community Interest Company, chaired by Sir Vincent Cable, and offers a resource local groups cannot afford to secure on their own. This gift can only be made as part of an enabling commercial development on the rest of the land.</li> </ul> <p>The LGS designation would, therefore, directly remove the recreational and historical value of the site (as private playing fields) which conflicts with the criteria of LGS. It also goes directly against the evidenced wishes of hundreds of members of the clubs currently using the fields – making this proposal unsound.</p>	<p>redevelopment which maximises the highest proportion of the site becoming available for public sport, recreation and community use.</p> <p>This will enable this private land to become community space with the involvement of Teddington residents rather than removing its historical value as a playing field and leaving it as a gated expanse of empty unused, wasted space.</p> <p>We ask that the council consider the site proposal ref 475 in the prepublication consultation comments document, keeping the OOLTI status and insert the proposed New Site Allocation to Local Plan at Chapter 12 – Site Allocation Former Imperial College Private Ground, Udney Park Road, Teddington.</p>	
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The implications of the LGS designation go beyond retaining a green space. The clubhouse on this site was the only site we found in our 6 month search with space to accommodate our Scout group and provide the storage we need. If LGS is designated, we will be homeless once again and may be forced to close as we have yet to find an alternative meeting place in our ongoing search. We are one of the oldest established Scout groups in Teddington, popular and over-subscribed, and this would be a great loss to the community.

By removing the recreational use of the land, the LGS designation would also conflict with the proposed Local Plan policies to support the needs of the community, making the plan unsound. These include:

- Proposed Policy LP28 Social and Community Infrastructure: facilitating social interaction and general community wellbeing and happiness.
- Proposed Policy LP30 Health and Wellbeing and Joint Strategic Needs Assessment evidence: facilitating environments that enhance health and wellbeing.
- Proposed Policy LP31 Public Open Space, Play Space, Sport and Recreation: improvement to existing facilities and spaces, including their openness and character and their accessibility.

Whilst a playing field, this site has not been open or accessible but always private.

I would also like to draw your attention to an ad placed in a local magazine by the Friends of Udney Park Playing Fields (FUPPF) as I believe it is misleading (image included below). It states that "FUPPF is committed to saving ALL of Udney Park Playing Fields with every blade of grass being used for community sports." The ad suggests that if the new owners are blocked from developing the site, the land will become available for community sports which is entirely inaccurate as the land is private and won't miraculously become available to the public. Even if it were, how would these community sports facilities be funded? The current clubhouse and grass pitches require more investment for maintenance/upgrading than the local community and sports groups can afford.

It adds: "We must not allow in Teddington a precedent of private property developers buying up

										<p>public assets that were donated in good faith for amateur sport.” This site was never a PUBLIC asset, it was always private land that was underused. It can become a public asset through the gift of 8 acres and commitment to build community and sports facilities and public open space that the present owner Quantum has proposed.</p> <p>Teddington Society’s proposal for LGS designation is counterintuitive as it would end any sporting use of the land, exactly what it is calling for. Neither Teddington Society nor FUPPF have provided any proposal on how this private site could be used and funded as playing fields in the future.</p> <p>This demonstrates that the support for the LGS is neither based on accurate facts nor is there evidence of consultation or strategy. It is of grave concern to me that the council has taken this view as the overriding opinion in Teddington; ignored the representations made by other community groups against this designation and based its decision on these inaccurate claims and unsubstantiated support.</p> <p>For the reasons listed above, we request that the Inspectorate rejects the proposal to designate the former Imperial College private ground as Local Green Space.</p>		
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75	174	Kevin <b>McMahon</b>	Local Green Space - Udney Park Playing Fields, Teddington Proposals Map Changes: Page number(s): 3 & 4 Publication Local Plan: Page number(s): 54-58 Paragraph number(s): 5.2 and 5.3 (and their sub-paragraphs) Policy no./name: LP13 and LP14. Other: Chapter 12 - Comments in relation to other sites / site omissions. Ref: 475 - Allocation of new site - Former Imperial College Private Ground, Udney Park Road, Teddington	No	Yes	Yes	Yes	Yes	<p>This representation is made by Duke Street Football Club on behalf of 22 members.</p> <p>Duke Street FC is a local Richmond Football Club and I myself am a resident of Richmond and business owner based in Teddington. We currently use the former Imperial College ground at Udney Park Road through the lease provided by the site owners (Quantum) to Teddington Athletic Football Club.</p> <p>We have seen the previous draft Local Plan representations put forward by Quantum and their proposals at a public consultation event in December 2016 for the site at Udney Park Road. We confirm that we are fully supportive of the plans to provide elderly care and retirement living on part of the site, and to improve the sports facilities on the remaining majority. We do not want to see this site designated as Local Green Space, as proposed in the Local Plan.</p> <p>I have spent many years of my life walking past this piece of private land thinking how I would love to play on these grounds but it has not been possible until now. The current owners, Quantum, have allowed community use on the grounds to show their intentions for the future of the majority of the site, which Duke Street FC have been fortunate to avail of. This was not possible under the previous ownership.</p> <p>We are happy that the proposed elderly care and retirement living is suitable for the area, and will most certainly be of benefit to the borough given the current housing crisis we face and the desperate need for elderly care.</p> <p>It is obvious that such a development on a portion of the site could deliver substantial benefits that are long lasting for many people in Teddington and the Borough of Richmond. We feel Quantum's proposals are an opportunity to achieve this and the status quo should not be preserved for a privileged few who will live around the site.</p> <p>Designating the site as Local Green Space will deny us many benefits that can be delivered as part of Quantum's proposals!</p>	<p>Duke Street FC strongly support the new allocation put forward by the current owners in the last round of representations (Reference 475). This could deliver real social benefit, securing the future of the site with enhanced sporting and community facilities available to the local area.</p> <p>In this instance, the playing fields are currently private and public use is not guaranteed. By allowing some development and therefore securing the transfer of ownership into the local community of the majority of the site and subjecting it to a substantial investment and renewal of facilities that will be for local community use is, in our view, worth the release of a small amount of the land for development.</p>	<p>See Officer response to Comment ID 4 above.</p> <p>It should be noted that the designation as a Local Green Space does not prevent the site's continued use for sport purposes and as a playing field. Indeed, the Local Plan and its policies encourage improved and enhanced facilities for outdoor open space and sport use, as set out in Policy LP 31.</p>
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76	52	Dan Henderson, CoverCoaches	Local Green Space - Udney Park Playing Fields, Teddington Proposals Map Changes: Page number(s): 3 & 4 Publication Local Plan: Page number(s): 54-58 Paragraph number(s): 5.2 and 5.3 (and their sub-paragraphs) Policy no./name: LP13 and LP14. Other: Chapter 12 - Comments in relation to other sites / site omissions. Ref: 475 - Allocation of new site - Former Imperial College Private Ground, Udney Park Road, Teddington	No	Yes	Yes	Yes	Yes	<p>This representation is made by CoverCoaches on behalf of 10 people involved with us and who have agreed with our position. Cover Coaches is a provider of tennis services.</p> <p>Our interest in this site is through my role on the board of advisors for Teddington Community Sports Ground Community Interest Company (TCSG CIC), a CIC set up by local community leaders and chaired by Sir Vincent Cable. CoverCoaches do not want the former Imperial College London Private Ground designated as Local Green Space. We agree with the position Teddington Community Sports Ground Community Interest Company (TCSG CIC) have taken, where they support the proposal that is being promoted by Quantum through their Local Plan representations made in previous rounds of the consultation (ref no 475). Quantum's proposal will provide a number of benefits including:</p> <ul style="list-style-type: none"> <li>- Gifting the majority of the land to the newly formed TCSG CIC, making previously private land available to everyone in the community.</li> <li>- New public open space to enrich the lives, health and well-being of residents and visitors.</li> <li>- Enhanced play and sporting opportunities for all ages and abilities.</li> <li>- Space for local groups and community activities.</li> <li>- Modern, multi-use facilities to meet the needs of local clubs and associations.</li> <li>- Affordable housing solutions for the elderly population – freeing up much needed family housing.</li> <li>- New publically accessible healthcare and GP services and employment opportunities.</li> <li>- A sustainable and protected legacy for future generations.</li> </ul> <p>We do not feel designating this site as Local Green Space is justified or within the public interest as Quantum Group have a proposition for the site that would provide meaningful benefits to the wider community, which, being private land, has never done before.</p> <p>In order to ensure these benefits are delivered, Quantum Group need to develop a portion of the site to do so. We fear the latest version of the draft Local Plan appears to have dismissed the benefits of the site's potential, which outweigh the loss of a portion of open space.</p>	<p>The draft Local Plan representation reference number 475 made by Quantum should be considered as an alternative and this site should not be designated as Local Green Space. We believe Quantum's proposals provide a well-considered set of plans to best achieve a number of benefits for the people of Teddington and Richmond. This PRIVATE land has never been a PUBLIC asset, Quantum's proposals are a real opportunity for it to become this.</p>	<p>See Officer response to Comment ID 4 above.</p> <p>It should be noted that the designation as a Local Green Space does not prevent the site's continued use for sport purposes and as a playing field. Indeed, the Local Plan and its policies encourage improved and enhanced facilities for outdoor open space and sport use, as set out in Policy LP 31.</p>
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77	210	Terence Worster, Patient Participation Group, <b>Park Road Surgery Teddington</b>	Local Green Space - Udney Park Playing Fields, Teddington Proposals Map Changes: Page number(s): 3 & 4 Other: Chapter 12 - Comments in relation to other sites / site omissions. Ref: 475 - Allocation of new site - Former Imperial College Private Ground, Udney Park Road, Teddington	No	Yes	Yes	<ul style="list-style-type: none"> <li>• The proposed local plan was prepared without the detailed knowledge of the current owners of the land and their proposals for the site.</li> <li>• The land is currently privately owned and until recently (the last year) was used for limited sporting facilities.</li> <li>• The land should be used more beneficially for the community as a whole rather than an enclave to be only viewed by the limited numbers of local residents.</li> <li>• As we have all recently become aware there is a vita need for suitable accommodation for the elderly and Quantum's proposals will help address this. The sporting facilities will be enhanced and made available for substantially more local people rather than the limited number who had access.</li> <li>• It is understood that Park Road Surgery will be able to have a site for a new surgery that they have been seeking for seven years and which is now critically required to allow the practice to look after the health and well-being of its 13,000+ patients currently on its list.</li> <li>• For the above reasons I do not support the local plan to designate the land adjacent to Udney Park Road being made a "Local Green Space". I support the proposals of Quantum to provide enhanced sporting facilities, a continuing care retirement community, and new healthcare facilities.</li> </ul>	<ul style="list-style-type: none"> <li>• Should the site in question be designated a "Local Green Space" it will only satisfy the few and be of little if any benefit to the residents of Teddington as a whole.</li> <li>• If the site is designated a "Local Green Space" it could well isolate a valuable local asset and could in time become a blighted site of no use to anyone.</li> <li>• I therefore urge this site "Udney Park Playing Fields" be removed from the designation of "Local Green Space".</li> <li>• With vision and suitable controls this site could be an extremely valuable asset to the community both in Teddington and to the Borough of Richmond.</li> </ul>	See Officer response to Comment ID 4 above.
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78	280	Simon Cartmell, <b>Teddington Community Sports Ground CIC</b>	Local Green Space - Udney Park Playing Fields, Teddington Proposals Map Changes: Page number(s): 3 & 4 Publication Local Plan: Page number(s): 54-58 Paragraph number(s): 5.2 and 5.3 (and their sub-paragraphs) Policy no./name: LP13 and LP14. Other: Chapter 12 - Comments in relation to other sites / site omissions. Ref: 475 - Allocation of new site - Former Imperial College Private Ground, Udney Park Road, Teddington	No	Yes	Yes	Yes	Yes	<p>We write in connection with the former Imperial College Private Grounds at Udney Park Road.</p> <p>The Directors of the Teddington Community Sports Ground CIC (TCSG CIC, Co Reg No 10611920) are community leaders that successfully run sports clubs and community organisations in the Borough. The CIC has recently been formed and has a direct interest in the above site. Through its Directors and Advisory Group the CIC reaches more than 6,000 local residents (3,500 members of Teddington RFC, Teddington Athletic FC, Teddington Town Sports Club plus members of organisations that constitute the CIC Advisory Board who have given the CIC authority to petition on their behalf and the 2,300 supporters of the 'Space to Play' campaign that was run in 2015). More pertinently it speaks for over 650 people who have explicitly said that they object to the designation of this site as Local Green Space drawn from these affiliated organisations plus other users of the UPR facility and non-affiliated local community members. The CIC Advisory Board includes 3rd Teddington Scouts, Park Road Surgery, Cover Tennis Coaches, all of whom have made separate representations, Bushy Park Girls Cricket and individuals with extensive sports facility and community sports policy and operations experience.</p> <p>A CIC is a type of company introduced by the Government in 2005 and designed for social enterprises that want to use their profits and assets for the public good. The CIC Regulator is appointed by Government with much of its time being spent on deciding if a proposal for a CIC is acceptable and monitoring compliance with CIC regulation. The CIC must be in the community interest and it must produce yearly statements to that effect, which the Regulator reviews. A fundamental feature of a CIC and why this vehicle was selected to manage the site is the requirement for an "Asset Lock". This is designed to ensure that the assets of the CIC (including any profits or surplus generated by activity) are used for the benefit of the community. This means that its assets must be retained within the CIC to be used for the community purpose for which it was formed.</p> <p>When the former Imperial College Private Grounds came to market, a number of individuals who are now Directors of the CIC led a campaign under the</p>	<p><b>(See also Publication Local Plan Comment ID 200)</b></p> <p>We consider draft Policy LP14, which rolls forward the existing adopted policy DMOS 3, provides suitable guidance and protection for the site under the designation of "Other Open Land Of Townscape Importance" whilst giving the flexibility needed to support proposals such as those being developed by the Quantum Group, or potentially any future owner of the site.</p>	<p>See Officer response to Comment ID 4 above.</p> <p>It should be noted that the designation as a Local Green Space does not prevent the site's continued use for sport purposes and as a playing field. Indeed, the Local Plan and its policies encourage improved and enhanced facilities for outdoor open space and sport use, as set out in Policy LP 31.</p> <p>It should also be noted that the OOLTI Policy LP 14 requires the protection of land designated as OOLTI in open use, and the policy only allows for minor extensions or replacement facilities provided that it would not harm the character or openness of the open land.</p> <p>Note that it is not the role of the plan-making process to assess a potential development, such as that proposed by the Quantum Group, against the Local Plan, London Plan and national policies as this will have to be done as part of the normal planning application process.</p>
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									<p>Space to Play initiative to secure the site for community use. Their intention was to use the site for sports provision for local clubs and community use. This would have been a substantial gain since the site was, and remains, enclosed private land and not open to the public. Historically it was leased to Newland House School for their sports provision and was occasionally hired by Richmond CC and a limited number of local/non-local bodies or clubs for sports camp use and other short duration or one off events. Unfortunately, despite the explicit support of 2,300 local people, the Space to Play campaign failed for two reasons: Firstly the underlying business plan that went alongside the bid was not certain to result in a financially viable long term entity due to the high maintenance costs of the grass based playing surfaces, and the poor state and inappropriate layout of the pavilion which would have required significant capital investment, and secondly the bid, based on what was an affordable purchase price, was unsuccessful. The conclusion reached by the Space to Play initiative was that the site can only be viable if there is a multiuse/3G artificial surface and a redesigned pavilion that facilitates broader community use and hence greater revenue generation and lower maintenance cost.</p> <p>The Spaces to Play team approached the eventual purchasers, Quantum Group, to determine if it would be possible to develop a combined proposition for the site that would provide meaningful benefits to the community, that would be financially sustainable in the long term, and be more than could have achieved in isolation in the absence of a major benefactor.</p> <p>As we understand it, the Quantum Group plan is to develop circa 2.9 acres with underground car parking, and transfer in perpetuity circa 8 acres of the site to the newly formed CIC and to provide first class facilities, built to the CIC's specification, for the community, something the CIC can not achieve by ourselves. This means the CIC can provide a range of community facilities that are missing in the central Teddington - multiuse games surfaces, social and meeting space, creche, open land trim trail etc. The business plan for this entity is sustainable in the long term because the initial capital outlay will have been avoided and because of the facilities we will be able to offer and charge</p>		
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for are a) substantial and of high quality and b) meet local needs, driving demand and uptake. Specifically, the TCSG CIC aspiration, subject to further review, consultation and Planning approval, is to provide:

1. 1X multi use artificial surface large sports pitch, with floodlights for evening use (equivalent to 3-4 grass pitches of equivalent size in usage terms)
2. 1X full size multi sport grass pitch
3. 1 x youth size grass pitch
4. 1 x multi use games area for tennis, netball, basketball etc.
5. A pavilion that can accommodate 4-6 changing rooms, physiotherapy room, exercise room for pilates, yoga etc, a meeting space for Scouts and other non-sports community activity groups, a function room space that is available to hire by the community, café, bar, secure cycle parking and car parking, built to DDA and National Governing Body/Sport England guidelines (in contrast to the existing pavilion)
6. A new crèche (either standalone or as part of the new pavilion)

The above facilities provide for a robust and sustainable business plan for the long term. In addition to the above facilities, being alert to needs expressed by local residents, we plan to also manage for the community:

7. A car parking area for pick up and drop off times to serve Collis School, benefiting the operation of the local road network; and
8. A new informal open space, accessible to anybody without restriction including new paths, trim trails, play space, etc. effectively opening up for public access a space that hereto has been an enclosed private space.

Whilst we will not be providing or running it directly, we understand a new GP surgery will form part of the overall masterplan for the site. As community representatives, we know this is a facility that is much needed when considering the existing facility it is planned to replace.

With the above package we consider the community will benefit by:

1. Up to 4,000 people will be able to use the sports facilities weekly - clubs, schools, local users across a wide range of sports, including evening training facilities which are in tremendously short supply

- following the Royal Park Agency decision to ban the use of floodlights in Royal Parks.
2. Provision of public access tennis courts in central Teddington... there are currently none available.
  3. Collis School and St Mary's College will have access to new sports facilities replacing lost facilities caused through the development of part of their sites for additional buildings;
  4. Other local schools and community groups will have access to improved and multiuse facilities especially when their grass pitches are unusable
  5. Disabled access sports facilities where few exist currently
  6. Members of the community will be able to hire the pavilion for business, training, community and social events;
  7. Members of the community will be able to use the new park for walks, keep fit, play, picnicking
  8. The new GP surgery will have the potential to provide services for circa 13,000 people
  9. The new school drop-off/pick up car park will mean substantial improvement to the operation of the local roads by providing a dedicated off-highways solution.

In order to fund and deliver the above, the CIC recognises there will need to be enabling development by Quantum Group, the current site owners. Whilst we do not comment on the acceptability of the proposed Quantum Group development, we understand that without it the CIC will not be gifted the land nor will any investment be made into the site to deliver the significant and demonstrable community benefit.

In a national and local climate where public services and facilities are being scaled back or withdrawn totally, the opportunity for the community to benefit in such a meaningful way from the above package, built and run at no cost to the local community, is rare and should not be dismissed without careful consideration. Additionally LBRUT residents benefit from significant amounts of local open and green space in the form of Richmond Park, Bushy Park, Home Park, the Thames Riverside, Ham Common, the Mereway area and so on. It is not as if there is a shortage of such protected, open space, where as there is a dearth of sports and community facilities as provided by the proposed development of the Udney Park Road site. Having reviewed the behaviour and actions of the Council

through the draft Local Plan process to date, we fear the latest version of the draft Local Plan appears to have dismissed the benefits of the site's potential to the local community in the mistaken belief that a Local Green Space designation makes the land more secure and more accessible by the community. We therefore make these representations to ensure that the Council is aware of the importance and value a large part of the local community place on the potential development plan for the site as demonstrated by in excess of 650 people who have indicated support for the representation being made by the CIC.

Having thought carefully, the CIC consider that substantial benefit will be derived for the community if the Quantum Group proposals progress in some form to be agreed via the planning process. We therefore support the concept of some limited development of the site, although we do not comment on the specifics of the Quantum proposal or any representations they may make. In our experience, it is very unusual for such community benefit to be offered as part of development proposals. Whilst it is understood that the package of proposals is necessary to potentially justify development that would otherwise not be acceptable, we feel that the overwhelming benefits that will be delivered to the community and protected by us is a worthwhile trade off. Through the TCSG CIC the community will benefit in perpetuity from the provision of a significant amount of open space, sports facilities and a community-use orientated pavilion.

In the above context, we object to the proposed change of designation of the site under draft Policy LP13 Local Green Space. We, and over 650 local residents who have explicitly given us their support, do not consider that sufficient justification has been provided by the Council to support the designation of the site as "Local Green Space" and that in any event to do so does is not in the public interest.

79	248	Marcin Rusiecki	Local Green Space - Udney Park Playing Fields, Teddington Proposals Map Changes: Page number(s): 3 & 4 Other: Chapter 12 - Comments in relation to other sites / site omissions. Ref: 475 - Allocation of new site - Former Imperial College Private Ground, Udney Park Road, Teddington	No	Yes	Yes	(This was left blank)	See Officer response to Comment ID 4 above.
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81	143	Martyn Spong, Kingston College Football Academy	Local Green Space - Udney Park Playing Fields, Teddington Proposals Map Changes: Page number(s): 3 & 4 Publication Local Plan: Page number(s): 54-58 Paragraph number(s): 5.2 and 5.3 (and their sub-paragraphs) Policy no./name: LP13 and LP14. Other: Chapter 12 - Comments in relation to other sites / site omissions. Ref: 475 - Allocation of new site - Former Imperial College Private Ground, Udney Park Road, Teddington	No	Yes	Yes	Yes	Yes	<p>This representation is made by the Kingston College Football Academy on behalf of 200 members of staff and students.</p> <p>Kingston College Football Club are a local football academy. We currently use the former Imperial College ground at Udney Park Road through the lease provided by the site owners (Quantum) to Teddington Athletic Football Club. Our academy provides an educational package encompassing classroom learning, football training, and match play, and we are pleased that our teams are competing at National Alliance level.</p> <p>We have seen the previous draft Local Plan representations put forward by Quantum and their proposals at a public consultation event in December 2016 for the site at Udney Park Road. We confirm that we are fully supportive of the plans to provide elderly care and retirement living on part of the site, and to improve the sports facilities on the remaining majority. We do not want to see this site designated as Local Green Space, as proposed in the Local Plan.</p> <p>We are happy that the proposed elderly care and retirement living will be appropriate for the area, and will provide an essential asset to the community. The provision of enhanced sports facilities on the remaining majority will be very beneficial to the local community, particularly for local groups such as Kingston College - the existing grounds and pavilion facilities are showing their age and could be laid out differently in line with modern norms, to provide a community facility that will be well used into the future.</p> <p>It is obvious that careful and sensitive development on a portion of the site could deliver meaningful and substantial benefits that are long lasting for a good proportion of the population in the surrounding area. We believe Quantum's proposals provide a well-considered set of plans to best achieve these aims.</p> <p>Whilst we understand that even a small loss of green space should ideally be avoided, we also understand that as a community we need to maximise the beneficial use of our borough's assets for the local community. In this instance, the playing fields are private and public use is not</p>	<p>Whilst wholesale development of the site is inappropriate, Kingston College FC strongly support the new allocation put forward by the current owners in the last round of representations (Reference 475). This could deliver real social benefit, securing the future of the site with enhanced sporting and community facilities available to the local area.</p>	<p>See Officer response to Comment ID 4 above.</p> <p>It should be noted that the designation as a Local Green Space does not prevent the site's continued use for sport purposes and as a playing field. Indeed, the Local Plan and its policies encourage improved and enhanced facilities for outdoor open space and sport use, as set out in Policy LP 31.</p>
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88	98	Cherry Haigh	Local Green Space - Udney Park Playing Fields, Teddington Proposals Map Changes: Page number(s): 3 & 4 Publication Local Plan: Page number(s): 54-58 Paragraph number(s): 5.2 and 5.3 (and their sub-paragraphs) Policy no./name: LP13 and LP14. Other: Chapter 12 - Comments in relation to other sites / site omissions. Ref: 475 - Allocation of new site - Former Imperial College Private Ground, Udney Park Road, Teddington	No	Yes	Yes	Yes	Yes	<p>As a Teddington resident, I was interested in the proposals that the Quantum Group (owners of Udney Park Road Playing Fields) shared with us at their exhibition last December. Their plans to build a retirement community on the old Imperial ground (as well as public sport and leisure amenities) are excellent, and just what we need. There is a shortage of suitable accommodation for older people in the area, so this would be a good use of the site.</p> <p>If this site were to be given the designation of Local Green Space (as per Proposals Map Changes) I am concerned that we will lose out on much needed elderly retirement accommodation of public facilities at this location. Particularly with recent announcements of government incentives supporting older people to down size to free up much needed family homes, surely Richmond Council should be embracing proposals such as Quantums? Surely On this basis, I do not support the designation put forward in the local plan.</p>	<p>I would like you to remove the designation of Local Green Space, as I do not believe that this recommendation is in the best interests of local people. I would like to see the new site allocation (ref 475) proposed for this land, as it will benefit the wider community.</p>	See Officer response to Comment ID 4 above.
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89	99	Mr Haigh	Local Green Space - Udney Park Playing Fields, Teddington Proposals Map Changes: Page number(s): 3 & 4 Publication Local Plan: Page number(s): 54-58 Paragraph number(s): 5.2 and 5.3 (and their sub-paragraphs) Policy no./name: LP13 and LP14. Other: Chapter 12 - Comments in relation to other sites / site omissions. Ref: 475 - Allocation of new site - Former Imperial College Private Ground, Udney Park Road, Teddington	No	Yes	Yes	Yes	Yes	I am not in favour of the designation of Local Green Space for the Udney Park Road Playing Fields. Whilst I appreciate that some residents have concerns regarding the future of this site, I do not think that they are representative of the whole community. Quantum's proposals to provide retirement housing and public recreation and sports facilities here will bring benefits to many people locally; not just a few. Therefore, I favour Quantum's approach over that of the local green space designation.	1. Remove the designation of Local Green Space, as I do not believe that this recommendation is in the best interests of local people. 2. Allow the new site allocation (ref 475) proposed for this land, as it will benefit the wider community.	See Officer response to Comment ID 4 above.
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90	28	Erin Bibby	Local Green Space - Udney Park Playing Fields, Teddington Proposals Map Changes: Page number(s): 3 & 4 Other: Chapter 12 - Comments in relation to other sites / site omissions. Ref: 475 - Allocation of new site - Former Imperial College Private Ground, Udney Park Road, Teddington	No	Yes	Yes		<p>I attended Quantum Group's exhibition before Christmas, and am very impressed with their plans. There is a real need for suitable accommodation for elderly people in the area, and I am speaking from experience, as I am currently looking for something like this for my mother. I am finding it difficult to find anything for her, and I imagine that there are many more people in the same boat.</p> <p>From another perspective I also have two young children who will be interested in sport very soon. To have a community sporting facility on my door step, on land that has always been private, is a fantastic benefit for the area.</p> <p>On this basis, I feel that we should be doing everything that we can to support Quantum's plans. If, as it states in the Richmond Local Plan that the Udney Park Road playing fields are to be designated local green space then we are effectively turning our backs on our ageing population. Not to mention all those who would enjoy the community sporting facilities that come with it.</p> <p>It is obvious to me that Quantum can deliver the right solution here, and I am fully opposed to the recommendation for Udney Park Road playing fields as Local Green Space in the local plan</p>	<p>I would like you to remove Udney Park Road Playing Fields from the proposals map under its current designation as Local Green Space.</p> <p>I would like to see the new site allocation put forward by Quantum to be implemented instead, as this is of far more benefit to both the elderly and the wider public.</p>	See Officer response to Comment ID 4 above.
91	139	Susan Keenes	Local Green Space - Udney Park Playing Fields, Teddington Proposals Map Changes: Page number(s): 3 & 4 Other: Chapter 12 - Comments in relation to other sites / site omissions. Ref: 475 - Allocation of new site - Former Imperial College Private Ground, Udney Park Road, Teddington	No	Yes	Yes		<p>As an elderly resident, who recently downsized and lives in Teddington, I think the development Quantum proposes is ideal and just what is needed. I do not think the local Plan is compliant as making Udney Park PF's Local Green Space will inhibit any building development and as the land is privately owned it would be impossible for the developer to make use of this space to benefit the whole community. We need this accommodation for elderly people and the community should be able to use this space - not just a few people as seems to have been the case in the past!!!</p>	<p>Take out Local Green Space designation for Udney Park P Fields. The land should / must be used to benefit as many people as possible as per reference 475, Quantum's proposals. Local Green Space for this site is <u>not</u> wanted by me.</p>	See Officer response to Comment ID 4 above.

92	283	Shelley Templeman	Local Green Space - Udney Park Playing Fields, Teddington Proposals Map Changes: Page number(s): 3 & 4 Other: Chapter 12 - Comments in relation to other sites / site omissions. Ref: 475 - Allocation of new site - Former Imperial College Private Ground, Udney Park Road, Teddington	No		Yes	Yes		<p>I do not support the changes that are outlined in the local plan, as I do not see any value in making the playing fields an area of local green space. The land is private, and has not been available to us to use in the past.</p> <p>I am familiar with what Quantum has proposed for the site, and what they have put forward makes perfect sense. Retirement accommodation is something that should not be overlooked: and suitable housing for older people really can make a world of difference. I would also like to refer to the Draft Local Plan (LP35 and LP37) which shows that there is an under provision for suitable accommodation for the ageing population.</p> <p>Quantum's solution to this under provision of homes, along with its proposal for the majority of the site to be opened to the public for leisure, sports and community use is exactly what we all need.</p> <p>I know that I am not alone in my views, and I hope that you pay heed to what most of the community wants - and not just a minority whose needs don't properly reflect the whole community.</p>	<p>I do not support the proposed map change for Udney Park Road to become local green space, as I do not see that this will be of any benefit to the many people who live in the area. A much more suitable alternative is the new site allocation that Quantum proposed, which will bring far more social and community benefits to a much wider section of people.</p>	See Officer response to Comment ID 4 above.
93	282	Mr Templeman	Local Green Space - Udney Park Playing Fields, Teddington Proposals Map Changes: Page number(s): 3 & 4 Other: Chapter 12 - Comments in relation to other sites / site omissions. Ref: 475 - Allocation of new site - Former Imperial College Private Ground, Udney Park Road, Teddington	No		Yes	Yes		<p>I do not support the changes that are outlined in the local plan, as I do not see any value in making the playing fields an area of local green space. The land is private, and has not been available to us to use in the past.</p> <p>I am familiar with what Quantum has proposed for the site, and what they have put forward makes perfect sense. Retirement accommodation is something that should not be overlooked: and suitable housing for older people really can make a world of difference. I would also like to refer to the Draft Local Plan (LP35 and LP37) which shows that there is an under provision for suitable accommodation for the ageing population.</p> <p>Quantum's solution to this under provision of homes, along with its proposal for the majority of the site to be opened to the public for leisure, sports and community use is exactly what we all need.</p> <p>I know that I am not alone in my views, and I hope that you pay heed to what most of the community wants - and not just a minority whose needs don't properly reflect the whole community.</p>	<p>I do not support the proposed map change for Udney Park Road to become local green space, as I do not see that this will be of any benefit to the many people who live in the area. A much more suitable alternative is the new site allocation that Quantum proposed, which will bring far more social and community benefits to a much wider section of people.</p>	See Officer response to Comment ID 4 above.

94	229	Daniel Lowe, Queens Park Rangers FC	Local Green Space - Udney Park Playing Fields, Teddington Proposals Map Changes: Page number(s): 3 & 4 Other: Chapter 12 - Comments in relation to other sites / site omissions. Ref: 475 - Allocation of new site - Former Imperial College Private Ground, Udney Park Road, Teddington	No		Yes	Yes		<i>(This was left blank)</i>		See Officer response to Comment ID 4 above.
95	230	Goncalo Pinto, Queens Park Rangers FC	Local Green Space - Udney Park Playing Fields, Teddington Proposals Map Changes: Page number(s): 3 & 4 Other: Chapter 12 - Comments in relation to other sites / site omissions. Ref: 475 - Allocation of new site - Former Imperial College Private Ground, Udney Park Road, Teddington	No		Yes	Yes		<i>(This was left blank)</i>		See Officer response to Comment ID 4 above.

96	128	Efosa Idehen	Local Green Space - Udney Park Playing Fields, Teddington Proposals Map Changes: Page number(s): 3 & 4 Other: Chapter 12 - Comments in relation to other sites / site omissions. Ref: 475 - Allocation of new site - Former Imperial College Private Ground, Udney Park Road, Teddington	No		Yes	Yes		<p>I am writing to object to the grounds in Udney Park becoming designated as Local Green Space. I have looked at Quantun's proposals for the site and think they should be supported. It makes absolutely no sense to me to make this land Local Green space as it will only restrict the amount of people able to use it which has always been the problem in the past! I believe there are a few local people who wish to keep the area as it is for their own benefit and tranquility and they should not be allowed to represent the views of our community as they are in the minority.</p> <p>There is a rising obesity crises in the country, a shortage of green space and a rising elderly population. It would seem obvious to me that Quantum's plans help address all these issues - providing homes for the elderly, opening the grounds for everyone to benefit and use and helping to ensure our local community stays active. I strongly approve the creation of a community Interest company to own and manage the space in the Public's interest and to ensure community ownership going forwards.</p> <p>I strongly oppose the Local Plan to make Udney Park playing fields Local Green Space.</p>	<p>If the site was designate Local Green Space, the Local Council would be responsible for denying residents of Teddington accessible sports pitched and community open space. I believe the Council should approve Quantum's proposal's (Reference 475).</p>	See Officer response to Comment ID 4 above.
97	65	A Dyson	Local Green Space - Udney Park Playing Fields , Teddington						<p>KEEP LOCAL GREEN SPACE MOST UNFAIR THAT LAND DESIGNATED FOR PLAYING FIELDS SHOULD BE USED FOR COMMERCIAL GAIN</p>		Support welcomed. No changes required.



98	228	Robin Meakins, Barton Willmore on behalf of <b>Quantum Group</b>	Policies: LP 13 and LP14 Page numbers: 54-58 Paragraph numbers: 5.2 and 5.3 (and their sub-paragraphs) Site name: Udney Park Playing Fields, Teddington Proposals Map Changes: pages 3-4, paragraph 2.2.1 Other: Previous Quantum Group representations Ref: 475 and Ref: 166		No		Yes	Yes	Yes	Yes	<i>See Publication Local Plan Comment ID 324</i>	<i>See Publication Local Plan Comment ID 324</i>	See the separate document with the Officer response on the Publication Local Plan, Comment ID 324.
3	33	Stephanie <b>Brooksbank</b>	Local Green Space - Udney Park Playing Fields, Teddington Policy: 2.2.2 Reasons for Local Green Space Designation - 'all'	Yes	Yes	Yes					<i>(This was left blank)</i>		Support welcomed. No changes required.



80	83	Rob Gray, <b>Friends of the River Crane Environment (FORCE)</b>	2.4 Other Sites of Nature Importance Designation of Meadway Orchard, Twickenham as OSNI Designation of Mereway Nature Park, Twickenham as OSNI Designation of the Rifle Range, Twickenham as OSNI	No					Yes		FORCE largely supports the proposals within the Local Plan. FORCE strongly supports the proposals in the Local Plan Proposals Map Changes, to include the Rifle Club, Mereway Nature Park and Meadway Orchard as Other Sites of Nature Importance. It is not clear whether these sites would be incorporated into the existing Lower Crane Valley Metropolitan SINC. FORCE would be very supportive of this incorporation, bringing these sites into an enlarged Lower Crane Valley MSINC	Local Plan Proposals Map Changes for the Rifle Club, Mereway Nature Park and Meadway Orchard. These new Other Sites of Nature Importance to be included as part of the Lower Crane Valley Metropolitan SINC.	Support welcomed. No changes required.  It is understood that the Metropolitan SINC review, which was run independently by the GLA, has recommended them to be added to the Lower Crane Valley Metropolitan SINC.
84	159	Nigel Johnston, Boyer Planning on behalf of <b>London and District Ltd</b>	2.5 Key Office Areas 42-46 Glenthams Road, Barnes	No	No		Yes	Yes	Yes	Yes	I am writing on behalf of the owners of 44 Glenthams Road, Barnes, hereafter referred to as 'the site', to object to the proposed designation of the property within a 'Key Office Area' (42-46 Glenthams Road) as set out within the emerging London Borough of Richmond Upon Thames Local Plan.  <b>Site Background</b>  The site comprises of a two storey property in the centre of a two storey U-shaped office block occupying the corner plot at the junction of Glenthams. The property is located within the Castelnau Conservation Area (CA25), which is almost entirely residential in character. The proposed designation of 42-46 Glenthams Road as Key Office Area is a new designation being introduced through the current draft Local Plan. The area currently does not have a site specific designation in the Council's adopted Development Plan. The whole site (42-46 Glenthams Road) is covered by an Article 4 Direction, removing permitted development rights allowing for a conversion from office to residential use, which came into force on 1 October 2016. No. 42 Glenthams Road has already gained consent for change of use from office to residential under references 15/5365/GPD15 and 16/1634/GPD15. Many other properties along Glenthams Road have been granted consent either through full planning	<b>Summary and Recommendations</b>  In summary: - The site is located in a residential area and the majority of properties on Glenthams Road (including 42 Glenthams Road – proposed as part of a Key Office Area) have gained permission for change of use to residential, or mixed use (office/residential). - The existing uses that take place at the site are small scale in nature and to date have not been subject of a specific employment designation within the adopted Local Plan. - The robustness of the employment projections within the latest employment land study are questionable, as highlighted within other parts of the Council's evidence base, thereby limiting the weight that should be attached to them. - There has been no detailed qualitative assessment undertaken to inform what type of office floorspace is required to meet future need. - The proposed designation of the site (and other proposed Key Office Areas) simply reflects the sites subject to Article 4 Direction restricting	Comments are noted. It is considered that the Council's evidence on protecting employment land is strong and robust and therefore Policy LP41 is sound. Paragraph 4.6 of the LBRuT Employment Sites & Premises Study 2016 Update (Peter Brett Associates) clearly states: " <i>The policy change is evidenced by the impact of permitted development rights on offices in Richmond, and by the 2013 ES&amp;P study that identified the need to increase office provision in the borough to meet a 62,000 sqm requirement. This update study substantially reinforces that view. It shows that demand for office floorspace has grown since the 2013 report, both in terms of net demand as a result of the improved economic outlook, but also because of the PDR changes that have been far worse than could have been anticipated in 2013.</i> " No changes necessary.  Also note the Officer response within the separate Publication responses document under Comment ID 264 in relation to the newly published GLA evidence studies and research: (1) London Office Policy Review, June 2017 and (2) London Industrial Demand Study, June 2017.

										<p>consent or under the permitted development rights to convert from office to residential, including: numbers 48; 50; 52; 60; 62; 64; and 80-82. We consider that given the site's relative small size; proximity to existing residential development (and new future residential development via the implementation of the above consents); and lack of robust site specific evidence to support the site's designation; means that the Council's proposal to designate the site within a Key Office Area (on top of the article 4 direction) represents an overly onerous level of policy protection that is unwarranted and inconsistent with national planning guidance.</p> <p><b>Assessment</b></p> <p>The area in which the site is located is predominantly residential. The Barnes Village Supplementary Planning Document (December 2015) - which provides a detailed character assessment of the Castelnuovo Conservation Area (within which the site is located) - confirms this, and makes no reference to importance of office locations within the area. Section 2.3 of the SPD sets out the key planning policy aims for the area and again does not make any reference to the protection of employment premises in the area, which one would expect if the area was indeed suitable for allocation as a Key Employment Area in the emerging Local Plan.</p> <p>In support of the proposed designation, the Council have published an updated Employment Sites and Premises Study (December 2016) which sets out the forecasted need for new office floorspace within the Borough up to 2033. This study finds that there is a significant increase in need for new office space, mostly due to the impacts of permitted development rights and an improved economic situation since the last assessment was undertaken in 2013.</p> <p>We note that the study favours Experian's trend and sector analysis. The Experian forecasts tend to be most reliable at regional and national scales and consequently less so at the local economy level. Experian are macro-economic forecasts meaning that they provide a top down logic to forecasting based on nation or regional economic growth, which is apportioned at lower geographies. Typically these forecasts place less emphasis on local economic circumstances.</p>	<p>permitted development rights and not individual assessment as part of an independent Employment Land Study;</p> <ul style="list-style-type: none"> <li>- Contrary to national planning guidance, the Council's proposed planning Policy LP 41 does not provide any circumstances in which a loss of employment floorspace would be acceptable and therefore the policies are not considered to be sufficiently flexible.</li> <li>- In light of this lack of flexibility, there is no scope to provide a mixed use scheme which could result in a quantitative reduction in floorspace, however at the same time it could result in a number of other benefits which in our view outweigh any harm (e.g. qualitative improvements, delivery of important new housing).</li> </ul> <p>In light of our representations, we request that the site's proposed designation as a Key Office Area be removed. If it is considered that these allocations be continued, we would recommend that the flexibility provided by Paragraph 22 of the NPPF be built in to Policy LP 41 to allow the change of use of the site to other uses should it be demonstrated that is no future prospect of it being used for employment purposes.</p>
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The robustness of the job projections are also questioned within other parts of the Council's evidence base. The Council's Strategic Housing Market Assessment (SHMA [December 2016]) states that *"Economic forecasts need to be treated with some degree of caution, they often show widely different outputs depending on the time of the forecast and the forecasting house"* (paragraph 6.8) and continues that *"overall, given the particular impact of a constrained land supply.....it seems reasonable to conclude (based on qualitative evidence) that the Experian forecasts are probably somewhat optimistic regarding future economic performance for use in the SHMA"* (paragraph 6.23). Nevertheless, the SHMA models the level of housing need based on employment forecasts and concludes that if these are to be met then annual housing delivery would need to be 963 dwellings per annum, far higher than the proposed housing target of 315 dwellings per annum. On this basis, it is evident that the constrained housing supply brings into question, again, whether these employment projections are robust.

Over the years as the Council's development plan has evolved a number of employment land studies have been undertaken which over a relatively short period of time have identified differing levels of employment projections. Given that the Plan covers the period up to 2033 and the economic uncertainties that are likely to arise as a result of Brexit, coupled with changing working practices, means that it is far from certain that the current projections would not be subject to further change, especially over the medium to longer term. It is therefore considered prudent that sufficient flexibility is inbuilt to policies in order that they are able to respond to a change in circumstances without having to be subject of a separate review. Irrespective of the robustness of the employment projections, what is not clear from the proposed employment projections and the update study is the qualitative demand for new office floorspace and to what degree site specific circumstances have been assessed. The emerging Plan confirms that the Key Office Area designations simply reflect the areas that we subject to the new Article 4 Directions that took effect on 1 October 2016. We do not consider this approach appropriate or robust and would expect that the decision to place such stringent restrictions on these sites to be based on robust site specific or area specific assessment.

Indeed, the preceding 2013 Employment Sites and Premises Study does provide a more detailed assessment of individual areas and concludes – in respect to the Barnes area – that it mostly comprises high street and very marginal office accommodation. The 2013 study notes that (in relation to the Barnes area) *‘in office terms most – although not all – office sites are more marginal and there are likely to be better options for making a stand than the properties in this area’*. Neither the 2013 study nor the 2016 study identifies the site or wider area as “key” for the provision of office space, and neither recommends such a strict site specific restriction as that proposed. As such we do not consider that the proposed designation of the site as a Key Office Area is based on the necessary robust evidential basis.

In respect to the level of restrictions imposed by proposed Policy LP 41, the NPPF, at Paragraph 22, identifies a need for planning policies to be sufficiently flexible to allow for a change of use to alternative uses if there is no reasonable prospect of the site being used for that employment purpose. Policy LP 41 as currently worded, does not allow for any circumstances in which a change of use would be permitted for sites designated as Key Offices Areas. This approach is clearly contrary to the flexible approach advocated by the NPPF and as such we consider the Plan to be inconsistent with national planning policy.

The Council have historically had a restrictive loss of employment policy, however this has not been considered sufficient by the Council to retain the necessary employment floorspace to meet need. Whilst the release of employment land has been above the benchmark targets advocated by the GLA, having acted as planning consultants on a number of planning applications involving the loss of employment land (e.g. refs: 13/4019/FUL & 10/1447/FUL) we can testify that in each case detailed marketing information was provided (and accepted by the Council) that showed the subject properties simply did not meet the requirements of the market resulting in no demand for that property. It is acknowledged that planning permission for these schemes was granted prior to the publication of the latest employment land study, however employment land studies dating back to 2006 have identified a growing demand for office floorspace, at least, so these applications would have been assessed against the backdrop of

									<p>an increasing need for office accommodation. In our view therefore, the site specific circumstances in terms of future demand; the quality of the site; and viability are important considerations that we consider has not been fully acknowledged by the Council's evidence base or emerging Policy as currently proposed.</p> <p>The Policy as currently worded also does not provide scope for mixed use redevelopments which would result in some loss of employment floorspace. Whilst such schemes may result in the quantitative reduction, they are capable of delivering a number of other benefits including qualitative improvements in employment floorspace together with the delivery of important new housing for which there is a significant identified need (the latest SHMA identifies an identified annual need for 1,047 dwellings yet the proposed housing requirement is for only 315 dwellings per annum). The nature of many of the existing uses makes them entirely suitable to be incorporated into a mixed use redevelopment yet the restrictive nature of the policy does not permit such an outcome.</p> <p>The draft Local Plan does not provide a detailed definition of a 'Key Office Area'; however for the reasons provided above we do not believe that the site can be considered suitable for such a designation.</p>		
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