

**London Borough of Richmond upon Thames – Local Plan Examination 2017**

**Statement of Common Ground –**

**London Borough of Richmond upon Thames and Greater London Authority on behalf of the Mayor of London**

The Mayor of London, in his representation dated 22 February 2017 to the Publication Local Plan consultation, made a number of comments.

In addition, the Council has been liaising with the Mayor and his officers on what changes the Mayor would seek to bring SA 8 into *general conformity* with the London Plan.

This Statement of Common Ground seeks to establish areas of agreement between the London Borough of Richmond upon Thames and the Mayor of London and also proposes resulting minor changes and modifications to the Publication Local Plan as submitted for independent examination in public. The Inspector is asked to consider these minor changes / modifications, which are acceptable to and have been agreed by both parties.

The Statement also identifies areas where agreement has not been reached and which may require further discussion during the examination / hearing sessions.

This Statement of Common Ground deals specifically with Site Allocation SA 8 St Mary's University. Note that a separate Statement of Common Ground is being prepared with Transport for London in relation to Policy LP 45 Parking Standards and Servicing, including Appendix 3 Parking Standards.

## **Background**

The Council's response to the procedural letter, dated 27 July 2017, set out that engagement and liaison between the Mayor of London and Richmond Council has been and continues to be taking place with officers at the Greater London Authority (GLA). The letter of 27 July confirmed that the Mayor of London has agreed to produce a Statement of Common Ground with Richmond Council in relation to policy SA 8 St Mary's University (as well as policy LP 45 Parking Standards and Servicing, including Appendix 3).

The Mayor of London and the Council have re-iterated that the London Plan and the Council's Local Plan set out strong policies on the protection of Metropolitan Open Land (MOL). Both parties agree that the main emphasis of the MOL policies is to protect designated land from inappropriate development, and refuse such development in MOL except in 'very special circumstances'. In addition, both parties agree that St Mary's University is a constrained site, particularly due to the majority of land not built on being designated as MOL.

The purpose of Policy SA 8 is to allow for the improvement and upgrading of existing facilities and new additional educational / teaching and other associated facilities as well as student residential accommodation to ensure the University remains a competitive and viable higher education facility in the future. Officers at the GLA have already confirmed that the Mayor supports the principle of expansion but without significant impact on designated MOL.

Both the Council and the Mayor therefore support growth and new development by maximising opportunities on land not designated as MOL whilst recognising that there may be some impact on MOL due to the constrained nature of the site, although it is acknowledged that any proposal coming forward would need to be assessed against the statutory development plan. Any 'inappropriate development' in MOL would therefore need to demonstrate 'very special circumstances' that outweigh the potential harm to MOL

The Council's letter of 27 July also set out that the Council does not wish to de-designate the site from MOL. It should be noted that this option has been previously discounted by the Council as a borough-wide Green Belt / MOL review has not been undertaken, and it would not be appropriate to consider this site in isolation. In addition, whilst neither the Council nor the GLA have undertaken a formal assessment of the site against the London Plan policy MOL criteria, it is considered that the site as a whole would meet the following criteria of section D of policy 7.17 of the London Plan (note that only one criterion has to be met to be soundly designated as MOL):

- 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

**Minor changes / modifications to Policy SA 8:**

The following has now been agreed between both parties:

Text proposed to be inserted in **bold underlined**

Text proposed to be removed in ~~red strikethrough~~

Section / Policy	Mayor of London	LBRuT	Reason for Change	Common Ground Agreed?
SA 8 – main policy	<p>Further to the Mayor of London’s submission on 22 February, the following change is now being sought: “Retention and upgrading of St Mary’s University and its associated teaching, sport and student residential accommodation. Upgrade works to include refurbishment, adaption, <b><u>intensification of existing buildings and</u></b> extensions and new build elements on site <del>where appropriate</del> <b><u>within previously developed land.</u></b> “</p> <p>The removal of ‘where appropriate’ and the position of ‘within previously developed land’ at the end of the sentence makes it clear that only development on previously developed land will be acceptable.</p>	<p>The Council would be amenable to the following modification if the Inspector considers a change necessary to make SA 8 ‘sound’:</p> <p>“Retention and upgrading of St Mary’s University and its associated teaching, sport and student residential accommodation. Upgrade works to include refurbishment, adaption <b><u>and intensification of existing buildings and within previously developed land, and</u></b> extensions and new build elements on site where appropriate.”</p> <p>The reference to ‘within previously developed land’ at the end of the sentence is not considered to be necessary as the existing policy text already refers to ‘where appropriate’.</p>	N/A	Not agreed


Section / Policy	Mayor of London	LBRuT	Reason for Change	Common Ground Agreed?
SA 8 – main policy	Further to the Mayor of London’s submission on 22 February, the following change is now being sought at the beginning of the second paragraph of the main policy text: “A Masterplan <b>and / or</b> site development brief, ...”	The Council agrees with the addition of ‘and / or’.	To provide greater clarity	Agreed
SA 8 – supporting text, 4 <sup>th</sup> bullet point	Further to the Mayor of London’s submission on 22 February, the following change is now being sought: “It is acknowledged that this is a <b>very</b> constrained site, with the majority of the land not built on designated as Metropolitan Open Land.”	The Council agrees with the deletion of the word ‘very’.	To provide clarity	Agreed
SA 8 – supporting text, 4 <sup>th</sup> bullet point	Further to the Mayor of London’s submission on 22 February, the following additional text is now being sought at the end of the bullet point: <b><u>“Land designated as Metropolitan Open Land will be protected. There is an expectation that proposals improve the character and openness of the Metropolitan Open Land.”</u></b>	The Council does not consider the additional sentence necessary as any proposal that could affect land designated as MOL will need to be assessed against the statutory development plan (i.e. London Plan policy 7.17 and LP 13 of the Local Plan) as well as the policy on Green Belt set out within the NPPF would apply.  If the Inspector considers that a change in this regard is necessary to make the Plan ‘sound’, the Council would agree to the change proposed by the Mayor:	To provide greater clarity	Agreed


Section / Policy	Mayor of London	LBRuT	Reason for Change	Common Ground Agreed?
		<b><u>“Land designated as Metropolitan Open Land will be protected. There is an expectation that proposals improve the character and openness of the Metropolitan Open Land.”</u></b>		
SA 8 – supporting text, 4 <sup>th</sup> and 5 <sup>th</sup> bullet point	Further to the Mayor of London’s submission on 22 February, the following change is now being sought: Delete the reference to Listed Buildings, Buildings of Townscape Merit as well as sports playing fields from the 4 <sup>th</sup> bullet point and move the sentence under the 5 <sup>th</sup> bullet point.	The Council agrees to this change as follows:  4 <sup>th</sup> bullet point: <del>There are also Listed Buildings, Buildings of Townscape Merit as well as sports playing fields.</del>  Insert at beginning of 5 <sup>th</sup> bullet point: <b><u>There are also Listed Buildings, Buildings of Townscape Merit as well as sports playing fields.</u></b> <sup>1</sup>	For clarity as the 4 <sup>th</sup> bullet point seeks to address issues and constraints in relation to MOL, whereas the 5 <sup>th</sup> bullet point is in relation to heritage assets.	Agreed
SA 8 – supporting text, 6 <sup>th</sup> bullet point	Further to the Mayor of London’s submission on 22 February, the following change is now being sought: “The Council will work with the University on a Masterplan <del>/site brief (SPD)</del> for the longer term upgrading of their sites, ...”	The Council proposes the following change:  “The Council will work with the University on a Masterplan <b>and / or site development</b> brief (SPD) for the longer term upgrading of their sites, ...”	To provide greater clarity	Agreed

<sup>1</sup> Note the Statement of Common Ground with Historic England, which seeks minor modifications to the second sentence of the 4<sup>th</sup> bullet point to emphasise the sensitivity of the site in relation to the heritage assets.

Section / Policy	Mayor of London	LBRuT	Reason for Change	Common Ground Agreed?
SA 8 – supporting text, 7 <sup>th</sup> bullet point	Further to the Mayor of London’s submission on 22 February, the following change is now being sought: “Detailed guidance on design and local character for any redevelopment proposal will also be set out within <del>the site brief (SPD) as well as in</del> the relevant Village Planning Guidance SPD.”	The Council proposes the following change:  “Detailed guidance on design and local character for any redevelopment proposal will also be set out within <del>the site brief (SPD) as well as in</del> the relevant Village Planning Guidance SPD, <b><u>and where relevant within the Masterplan / site development brief.</u></b> ”	To provide greater clarity	Agreed

Both parties consider that these amendments address the concerns raised by Port of London Authority in their representations and their written statements on the **London Borough of Richmond Upon Thames – Local Plan Examination 2017**

Signed on Behalf of the London Borough of Richmond upon Thames		
Name and Position	Signature	Date
Andrea Kitzberger-Smith Planning Policy and Design Team Manager London Borough of Richmond upon Thames		07 September 2017

Signed on Behalf of the Mayor of London		
Name and Position	Signature	Date
Juliemma McLoughlin Assistant Director - Planning Greater London Authority		07 September 2017