

LONDON BOROUGH OF RICHMOND UPON THAMES

LOCAL PLAN INDEPENDENT EXAMINATION IN PUBLIC

WRITTEN STATEMENT

**HEARING 5: CHARACTER AND DESIGN; GREEN INFRASTRUCTURE; CLIMATE
CHANGE**

MONDAY 9 OCTOBER

COUNCIL RESPONSES TO QUESTIONS 8-15, ON GREEN INFRASTRUCTURE

Document version: 8/9/17

Does the Plan take a justified and suitably evidenced based approach towards Green Infrastructure? Is the Plan consistent with national policy in such regards and will it be effective in implementation?

Yes, the Plan takes a justified and evidence based approach towards Green Infrastructure, as set out below within the Council's responses to questions 8 to 15 within this Statement.

The Plan is consistent with national policy with regard to Green Infrastructure and it is considered to be effective in its implementation. See the Council's responses to questions 8 to 15 within this Statement below.

8. Is the evidence base supporting Policy LP 12, LP 13¹ and Local Green Space (LGS) robust?

Are Policies LP 12 and 13 clear in their intention/wording and means of delivery?

Policies LP 12 and LP 13 are informed by a robust set of studies which provide evidence in relation to green infrastructure. This includes the Council's Open Space Assessment (SD-047), which analysed over 200 sites of varying typologies, and the Infrastructure Delivery Plan (SD-021), which specifically analysed the current provision and future requirements.

In the context of Green Infrastructure, it is important to note that this includes a wide variety of spaces, including parks of varying sizes (as set out in the Public Open Space Hierarchy of policy LP 12) as well as others such as play areas, allotments and the borough's rivers. National guidance, which is reflected within the supporting text of LP 12, stresses that planning should contribute to conserving and enhancing the natural and local environment and reducing pollution (paragraphs 109-125).

There is relevant regional policy (set out in the London Plan) as well as guidance and evidence produced by the Mayor of London, including the Mayor's All London Green Grid (ALGG) SPG (PS-076). The SPG identifies two Framework Areas relevant for Richmond borough (i.e. [The Arcadian Thames](#) (PS-077) and the [River Colne and Crane](#) (PS-078)), and there are numerous parks, open spaces and the River Thames and Crane corridors within the borough that contribute to green infrastructure networks that perform a wide range of functions for residents, visitors, biodiversity and the economy. As a component of sustainable development, Green Infrastructure should be considered at an early stage of a planning proposal. Policy LP 12 also sets out the hierarchy and uses of the Public Open Spaces that planning proposals should protect and enhance, which is in line with the London Plan categorisation of open space (Policy 7.18).

The evidence (SD-021) demonstrates that the borough has over 2,000 ha of open space; about one quarter of this is managed by the Council. Richmond Park (1,000 ha) and Bushy Park (450 ha) are the largest and second largest open spaces in London; the Old Deer Park (147 ha) and the River Thames towpath (27 km) provide a regional recreational function. Overall, the borough is very well provided with public open space in relation to its population, having 13 ha per 1000 compared to the Sport England's recommended 2.48 ha (6 acres) per 1000. With a resident population of 194,700 (ONS 2015 Mid-Year Estimates), this provides almost 12 ha per 1,000 population, comparing extremely favourably to the traditional 2.43 hectares per 1,000 population. This shows that this borough is not deficient in open space

¹ A reference to LP 13 has been inserted to provide clarity to the question.

on a borough-wide basis. Notwithstanding, the IDP recognises that demand on Green Infrastructure is likely to increase rather than decrease, from both local residents and from visitors from inner London boroughs, particularly as London's population grows; this is also recognised within the Plan, which states that the borough's parks and open spaces provide a green lung for south/west London. As an example, the Council recently created a new Public Open Space / woodland play area called 'Strawberry Woods' at Stanley Road, Twickenham ([Map](#)), where the Council has transformed an area of overgrown wasteland into an innovative play area.

Overall, there are few areas in the borough, which are outside the 400m catchment for local parks, and most of these are within easy reach of a District Park. If the River Crane Park and Kneller Gardens are treated together as a District Park, there are few areas outside the 1.2 km catchment for a District Park. There are few areas outside the 500m catchment for sites of nature interest. Most of the borough is within 1.2km of at least one of the three strategic walking routes. Therefore, overall the evidence demonstrates that apart from the areas of deficiency in Public Open Space provision (as set out within the existing Proposals Map, SD-020), where there is no alternative open space, it is considered that no new open space is required, but that the emphasis should be on the protection and enhancement of existing open space, including areas of nature importance.

In relation to Policy LP 13 (Green Belt, MOL and LGS), the national and regional policy and guidance set out the evidence base in terms of how development proposals within such designated land should be dealt with. In line with higher level policies and guidance, 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. The Council did not carry out a Green Belt or MOL review because the Plan and its spatial strategy demonstrate that the borough can meet its housing target, set by the London Plan, without releasing open land that is protected by designations such as Green Belt or MOL.

Policies LP 12 and 13 clear in their intention/wording as well as their means of delivery. The policies set out for developers and applicants what should be protected, i.e. Green Infrastructure as well as Green Belt, MOL and LGS, and where possible their schemes should enhance elements of Green Infrastructure. The criteria for assessment are set out in LP 12 A (criteria a to c) and LP 13 B (criteria 1 to 3) respectively. In addition, all developments will be assessed as to whether they incorporate appropriate elements of open space that make a positive contribution to the wider network (this also links with Policy LP 31

where applicable) and LP 13 in particular encourages improvements and enhancements to the openness and character of Green Belt or MOL.

How is the approach to LGS designed to work in practice? What evidence underpins the policy formulation in this regard?

In line with paragraphs 76 to 78 of the NPPF, Local Green Space (LGS) is green or open space, which has been demonstrated to have special qualities and hold particular significance and value to the local community which it serves. It should be noted that in line with NPPF, it is not a criterion for LGS to be publicly accessible, and for this reason it is also not included within the POS Hierarchy set out in LP 12. A LGS designation and corresponding policy guidance has been included following the Regulation 18 consultation, because a local community had identified an area (i.e. Udney Park Playing Fields) for special protection. At that stage, the Council considered the proposed LGS against the requirements set out in paragraphs 76 and 77 of the NPPF, and it was considered that it met the NPPF criteria. In line with regulations, every designation on a Proposals Map requires a corresponding policy, and therefore guidance on LGS has been included within policy LP 13 (Green Belt and MOL). The reason for this is because the NPPF states that local policy for managing development within a LGS should be consistent with policy for Green Belts. In addition, the Council has developed additional criteria to be taken into account when assessing applications for LGS, and these are set out in paragraph 5.2.10.

Therefore, in practice, should the Council receive further applications for LGS as part of subsequent Local Plan reviews, these will be assessed against the criteria in the NPPF, the guidance contained within the PPG (paragraphs 005 to 022 of 'Open space, sports and recreation facilities') as well as the criteria in policy LP 13. Should a proposal for development come forward on designated LGS, then this will be assessed against the NPPF and the criteria set out in policy LP 13, whereby development that could cause harm to the qualities of the LGS would be considered inappropriate and would only be acceptable in very special circumstances where benefits can be demonstrated to significantly outweigh the harm.

In relation to the evidence for designating Udney Park Playing Fields and how this has been assessed against NPPF and LP 13 criteria for designation, please refer to Appendix 1 for further details. This demonstrates that the application for a LGS designation of Udney Park Playing Fields meets all of the criteria as set out in LP 13 of the Plan policy as well as the policy and guidance set out within the NPPF and PPG.

Furthermore, Appendix 2 sets out the detailed assessment of the application by the Mortlake Brewery Community Group' and Mortlake residents' to designate the sports field at Lower Richmond Road, Mortlake as LGS, and why the Council concluded that this site does not meet all criteria for designation in line with the NPPF, PPG and LP 13.

Does the plan contain adequate reference to the River Crane?

Yes. The River Crane corridor is an important element of the Blue Ribbon Network, and regional policy and guidance applies as part of the statutory development plan, i.e. London Plan policy 7.24 as well as the ALGG (PS-076) and the [River Colne and Crane Area Framework \(PS-078\)](#). Policy LP 12 contains a general reference to watercourses within paragraph 5.1.2, and a specific reference to the ALGG and the River Colne and Crane Area Framework within paragraph 5.1.6. In addition, Policy LP 18 deals specifically with river corridors and recognises that the borough's rivers, including the Crane, are important components of the wider Green Infrastructure network. This policy provides general guidance to applicants and developers in relation to the borough's rivers. Paragraph 5.7.4 of LP 18 deals specifically with the River Crane, and highlights why it is important and what developments alongside and adjacent should contribute in terms of the overarching aim of creating a new continuous metropolitan park. Therefore, it is considered that the Plan contains adequate and sufficient references to the River Crane.

9. Is the Local Plan's approach to Green Belt justified, consistent with national policy and in conformity with the London Plan?

National and regional policy and guidance set out the approach in terms of how development proposals within land designated as Green Belt or MOL should be dealt with. In line with London Plan policy 7.17, MOL is given the same level of protection as Green Belt and therefore paragraphs 79-92 of the NPPF on Green Belts applies equally.

Government and the Mayor of London give great importance to the protection of Green Belt (which applies equally to MOL within London). In line with NPPF the aim of Green Belt as set out within the supporting text to LP 13 is to prevent urban sprawl by keeping land permanently open. MOL is of strategic and London-wide importance, and policy 7.17 of the London Plan states that the strongest protection should be given to London's MOL and inappropriate development refused, except in very special circumstances.

Consistent with the national policy, 'inappropriate development' is by definition harmful to Green Belt / MOL and should be refused unless 'very special circumstances' can be demonstrated that clearly outweigh the harm.

Policy 7.17 of the London Plan states that appropriate development should be limited to small scale structures to support outdoor open space uses and minimise any adverse impact on the openness of MOL. This guidance is reflected and reiterated within policy LP 13 to ensure general conformity with the London Plan.

Therefore, the Plan's approach to Green Belt and MOL is justified and consistent with national policy; reference to the relevant guidance within the NPPF and paragraphs 79-92 is included within the supporting text of LP 13. In addition, the Policy is in conformity with the London Plan as the Mayor of London has not raised any issues in this regard during the Regulation 19 consultation.

Are alterations to the Policies Map necessary?

Changes to the currently adopted 2015 Local Plan Proposals Map (SD-020) have been collated and set out within the Proposals Map Changes document (SD-002). The changes are considered to be clear and comprehensive, and have been subject to public consultation at the Regulation 19 stage.

In relation to Green Belt, MOL and LGS, SD-002 sets out the removal of a small parcel of land at Harrodian School, which has been agreed with the School as well as the Mayor of

London. The only other change to the Proposals Map is the designation of the Udney Park Playing Fields as LGS. No further alterations are necessary.

The Inspector should note the Council's / officer responses to the Regulation 19 Publication responses (LBR-LP-002 and LBRLP-003) for the detailed responses to Representors who are seeking changes to Green Belt / MOL designations.

10. What is the justification for LP 14 and the designation of Other Open Land of Townscape Importance? Is the policy consistent with national policy?

The Council considers the policy to be justified and in line with national policy. The purpose of this policy is to safeguard open land of local importance. In parts of the borough, open areas, including larger blocks of private gardens, which are not extensive enough to be defined as Green Belt or MOL, act as pockets of greenery of local rather than London-wide significance. Many of these are of townscape importance, contributing to the local character and are valued by residents as open spaces in the built-up area. These Other Open Land of Townscape Importance (OOLTI) areas can include public and private sports grounds, some school playing fields, cemeteries, some large private gardens and some allotments. The designated areas are shown on the Proposals Map.

It should be noted that the OOLTI policy and designation is a long-standing policy approach within Richmond borough. It has first appeared in the 1985 Local Plan and in all subsequent plans, each of which were subject to public examination. The wording of the policy and its supporting text has changed little over the years. The principle and details of such a policy were accepted by the relevant Inspectors. Most notably, at the DMP (SD-016) examination in 2011, the Inspector fully considered the criteria that should be taken into account when defining OOLTI (see the Inspector's report, PS-079). These are now set out within paragraph 5.3.4. The policy has been successfully applied for many years.

Overall, the protection of open spaces that are of local importance is considered to be fundamental for achieving sustainable development within this borough. They contribute significantly to the local character and are valued by residents and local communities due to the multiple benefits they provide, such as in relation to the character and setting of the borough's historic areas, buildings and townscape; providing visual amenity and attractive settings and outlook for surrounding properties; contributing to the wider Green Infrastructure Network and their value to biodiversity and nature conservation. They are therefore an intrinsic part of the Plan's vision and spatial strategy. Furthermore, open spaces contribute to the quality of place, which is a key factor in attracting investment, jobs and growth to an area. Therefore, the borough's land designated as OOLTI form an important part of the wider Green Infrastructure network, which is considered to have economic value to the surrounding area, in addition to creating community-wellbeing.

The Mayor of London, as part of its London Plan policy 7.18, states that the loss of protected open spaces must be resisted unless equivalent or better quality provision is made within the local catchment area. Specifically, the London Plan states that boroughs should include appropriate designations and policies for the protection open space to address deficiencies.

The supporting text to 7.18 confirms that local open spaces are key to many issues, such as health and biodiversity. The policy is therefore consistent with the London Plan in terms of having clear planning policies on the designation of local open spaces and the identification of areas of local deficiency (based on benchmarks set out in the London Plan).

The NPPF (paragraph 73) states that access to high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and well-being of communities. Planning policies should be based on robust and up-to-date assessments of the needs for open space, sports and recreation facilities and opportunities for new provision (see the Council's evidence and research set out within SD-044, SD-045, SD-046 and SD-047). In addition, paragraph 74 states that existing open spaces should not be built on unless certain criteria can be complied with.

It should be noted that this Local Plan review is not proposing any changes to the OOLTI designations other than in relation to SA 17 St Michaels Convent (see the Council's statement on question 9, Hearing 4).

11. What evidence supports the approach of LP 15 and is Natural England satisfied fully with its content?

All public authorities in England and Wales have a duty to have regard, in the exercise of their functions, to the purpose of conserving biodiversity. The NPPF is clear that pursuing sustainable development includes moving from a net loss of biodiversity to achieving net gains for nature, and that a core principle for planning is that it should contribute to conserving and enhancing the natural environment and reducing pollution (see Paragraph 17 of NPPF).

The London Plan (policy 7.19) requires local policies to protect priority species and habitats and clearly identify European and nationally important sites. There is a need to identify, protect and enhance the borough's biodiversity, and great emphasis should be given to connectivity of habitats and features to the wider ecological and Green Infrastructure networks, as set out in the ALGG SPG (PS-076).

Natural England, in their response to the Publication Local Plan consultation, have confirmed that there are no issues to highlight regarding the four tests of soundness, and that therefore they will not want to attending or speak at the examination.

The Inspector should also note that during the Regulation 18 consultation, Natural England set out within their response (SD-004, Appendix 3, Reference Nos. 12 & 169) their support for the overall vision of the plan, including its strategic objectives. At this stage, they also set out their full support for policy LP 15 and that this accords with paragraph 109 of the NPPF.

12. Is LP 16 B (3) justified, consistent with national policy and will it be effective in delivery?

The borough has a significant amount of tree cover and the abundance is a great asset to the borough's unique environment. Trees are considered to contribute significantly to the special environment of the borough due to their multiple benefits. The Council has adopted its own Tree Policy (PS-080), which recognises the benefits of trees and outlines a responsible management approach towards trees in the borough.

Policy LP 16 is consistent with the NPPF protection of ancient woodland and veteran trees, and London Plan policy 7.21, which states that trees of value should be maintained, any loss as a result of development should be replaced, and new trees should be included in new developments. This is consistent with the Council's approach to local character, assets, features, and design quality through the borough's village planning process.

The specific policy criterion in relation to a financial contribution to the provision for an off-site tree in case a tree is felled is considered to be appropriate. The policy states that this only applies 'where practicable', and that the monetary value of the existing tree will be required in line with the CAVAT methodology. This particular policy criterion is considered to be effective in delivery and has already been applied by the Council on certain specific planning applications, where a financial contribution for a tree replacement was considered to be a site-specific requirement as part of the planning permission. The average price for a replacement street tree and landscaping is £500. In terms of the practical arrangements, the Council's Arboricultural officer will be notified and a tree bond entered into as part of a Section 106 agreement. As part of this, the Council fully complies with the S106 pooling restrictions as this policy approach does not seek to pool contributions such as for public realm, but is specifically to compensate for a loss of a tree that has to be felled as part of a development, and to allow the Council to provide an appropriate off-site replacement tree.

13. What is the justification for LP 17? Has it been considered adequately for its effect upon development viability?

Green roofs and/or brown roofs, due to their multiple benefits, are considered to be important within an urban environment, particularly as they help to adapt to climate change by absorbing rainfall, reducing surface water flooding, improving the thermal performance of buildings and reducing air temperatures through evapotranspiration. Green roofs and walls also assist in the greening of development and add to the wider network of Green Infrastructure as well as enhance biodiversity and visual amenity.

The policy approach is in line with London Plan policy 5.11, which considers green roofs as an essential sustainable design consideration, and therefore advocates boroughs to promote the use of green roofs. Policy LP 17 will also help to contribute to the Mayor of London's target to make the city "50% green" by 2050, as set out in the draft London Environment Strategy (PS-081).

Policy LP 17 adopts a proportionate approach to green roofs in the borough, with a requirement for applications for new major developments with roof areas over 100sqm to incorporate a green roof, subject to feasibility and considerations of visual impacts. This is not a new policy and a significant number of green roofs have been permitted since this policy was first introduced as part of the DMP (SD-016) in 2011. Within the evidence base for this policy, the Council has considered the detailed costs of differing kinds of green and/or brown roofs and the impact of this on the development. The consideration of practicability is further clarified by the explanatory text for the policy, wherein viability information is a consideration, i.e. paragraph 5.6.4 states that the Council will take into account relevant viability information. It should also be noted that this policy only applies to major developments, of which the borough only receives very few per annum (see Appendix 1 to the Council's Statement for Hearing 2).

In addition, the Inspector should note the Whole Plan Viability Assessment (SD-024), which allowed for a cost in relation to LP 17. This assessed flats, as should a major development scheme contain houses rather than flats, it is most likely that green roofs are technically not feasible due to pitched roofs proposed as part of houses. In addition, flats would be sold leasehold, wherein it is easier to control the ongoing maintenance and management of green roofs. It is therefore considered that the impact of LP 17 has been adequately assessed for the effect on development viability.

14. Is LP 18 justified and flexible in operation? Are criterion C and D warranted and capable of implementation?

There is a need to protect and enhance the natural and built environment and unique historic landscape of the borough's corridor and take account of the relevant strategies relating to the rivers. The policy is in conformity with the London Plan Blue Ribbon Network policies 7.24 - 7.30, in particular, Policy 7.29 relating to the River Thames and the Thames Policy Area as well as the Arcadian Thames Framework, which is part of the Mayor's ALGG SPG (PS-077).

Part of the Arcadian Thames Framework's objectives is to increase and improve pedestrian connections and promote recreational riverside improvements along the rivers corridors and through Royal Parks and Commons. The Framework contains a rolling list of projects, which sets out the relevant partners, such as the Thames Landscape Strategy, the Boroughs of Kingston, Richmond and Hounslow, the Historic Royal Palaces, landowners and other key stakeholders such as Historic England / English Heritage, Environment Agency, PLA; it also includes sources of funding where known.

Policy 7.27 of the London Plan specifically states that proposals should "protect and improve existing access points to (including from land into water such as slipways and steps) or alongside the Blue Ribbon Network (including paths)". In addition, it clearly states that new access infrastructure into and alongside the Blue Ribbon Network should be sought. Furthermore, the supporting text of Policy of 7.29 at paragraph 7.96 states that as part of major development proposals for sites with a Thames frontage, consideration should be given to the need and desirability of having facilities to enable access to and from the river, both for boats and for pedestrians. This may include the retention, refurbishment or reinstatement of existing or former access points or the provision of new facilities.

In terms of provision of new public access, Part C of the policy clearly states 'where possible'. In addition, as set out in Part D of the policy, it is the Council's view that the onus should be on the developer to work with adjoining landowners, where necessary, to gain public access to the riverside, where this is not yet available, and ensure that proposals provide wider public benefits, especially benefits to the local community. The Council will take into account site specific characteristics and circumstances, which will be assessed on a case by case basis.

Therefore, the policy overall, including Criterion C and D, is considered to be justified, flexible in operation, warranted and capable of implementation. It is in conformity with the London Plan; the Mayor of London and the Environment Agency support this policy.

It is acknowledged that the PLA raised some concerns with regard to LP 18 and therefore a positive Statement of Common Ground has been agreed with the PLA, which sets out some minor changes to LP 18 (see SoCG with PLA, LBR-LP-007).

15. Is LP 19 justified as a whole and are the criteria warranted and capable of implementation?

The River Thames is designated as MOL and therefore the openness and character of the river will be safeguarded from inappropriate uses. The policy sets out a presumption against new or extensions to existing houseboats whereas Part B seeks to safeguard the character, openness and views of the river.

This policy is in conformity with London Plan Blue Ribbon Network policies 7.24 - 7.30, in particular Policy 7.27 point c., which states that proposals should protect and enhance waterway support infrastructure such as boatyards, moorings, jetties and safety equipment etc. It also states that new mooring facilities should normally be off line from main navigation routes, i.e. in basins or docks. The supporting text goes on to say consents for and the use of new moorings should be managed in a way that respects the character of the waterways and the needs of its users. Importantly, it also states that the rivers should not be used as an extension of the developable land in London nor should parts of it be a continuous line of moored craft.

It is of utmost importance in this borough to protect the River Thames, its special reaches, character areas and its openness, in line with the Thames Landscape Strategy, the ALGG SPG (PS-076) and the Arcadian Thames Framework (PS-077). Richmond borough is the only London borough to span both sides of the River Thames. Whilst it is acknowledged that existing houseboats, moorings and other floating structures are an established part of the river scene, without this Policy there would be a concern that there could be an increase in planning applications for residential and private permanent moorings, whilst the main aim of the Council is to ensure that the river is accessible to all, for pleasure and recreation as well as navigational purposes, and as such of wider benefit to the community and residents that it serves.

The Inspector should note that this policy has been taken forward from the DMP Policy DM OS 3 (SD-016). Whilst it has been streamlined to some extent, the emphasis of the policy approach has remained unchanged. DM OS 3 has been successfully implemented over the years.

Therefore, the Council is of the view that all criteria set out within this policy are justified, based on the local evidence as well as the character and nature of the borough. In addition, the policy ensures compliance with the relevant London Plan policies. In particular, criterion 4 is of importance as it is necessary to ensure moorings and other floating structures are of

wider benefit to the local community, such as for example providing mooring for pleasure craft and enjoyment of the river.

The London Borough of Richmond upon Thames has introduced a Moorings Byelaw (see www.richmond.gov.uk/byelaws_and_local_legislation for further information) that came into effect on 13 March 2015. As such, it is a criminal offence to moor a vessel longer than permitted without the written consent of the Council. In addition, the EA and PLA have licencing powers over houseboats.

The Inspector should also refer to the positive Statement of Common Ground that has been agreed with the PLA (LBR-LP-007).

Overall, based on the above, the policy is warranted and capable of implementation.

Appendix 1 – Evidence to support the designation of Udney Park Playing Fields as LGS designation

The application of the Teddington Society and the Friends of Udney Park Playing Fields received as part of the Regulation 18 consultation on the Plan has been considered and assessed against the Policy LP 13 criteria (in paragraph 5.2.10 of the Plan), the NPPF and PPG. The following sets out a detailed assessment of this site against *each criterion of LP 13 (set out in italics)*, which incorporates an assessment of the relevant NPPF criteria and guidance within the PPG on Local Green Space (paragraphs 005 to 022 of ‘Open space, sports and recreation facilities’):

- *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 working in Teddington, is by far the largest community group in the locality with very high membership levels. This is a long-established, well organised and respected society, which was formed in 1973 and has been going for over 40 years. In addition, it should be noted that in March 2016 the Udney Park Playing Fields have been designated as “Asset of Community Value”, following careful consideration of the criteria and relevant legislation.
- *There is no current planning permission which once implemented would undermine the merit of a Local Green Space designation:* whilst this criterion is an additional one to those set out in the NPPF, the Council considered that it was important for this to be added to Policy LP 13 as otherwise it could undermine a development for which permission was already granted. It is the case that there is no current planning permission for development on this site. Indeed, the playing fields are designated Other Open Land of Townscape Importance (OOLTI), and the associated OOLTI policy states that these areas will be protected in open use, and enhanced where possible.
It is noted that the Quantum Group (representor ID 228) has carried out pre-application consultations with the local community. However, it is not the purpose of the plan-making process to assess potential future developments on designated open land (whether OOLTI and/or LGS) against planning policies.
- *The site is not land allocated for development within the Local Plan:* this criterion is considered to be met as there is no site allocation for development within an existing or emerging Local Plan.
- *The site is local in character and is not an extensive tract of land (this corresponds with the third bullet point of the NPPF criteria):* this criterion is considered to be met as Udney Park Playing Fields are existing playing fields and the site is approximately 13 acres in size, which in an urban setting is a substantial piece of recreational space though within the 5 acres to 50 acres Policy Guidance for Local Green Space.
- *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 latter part of this criterion corresponds with the first bullet point of the NPPF criteria):* the Playing Fields are situated in the heart of Teddington, easily accessed on foot or public transport by the community; therefore, this criterion is considered to be met. It is noted that the playing fields are not publicly accessible; however, they are reasonably close 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), tranquillity or richness of its wildlife* (this corresponds with the second bullet point of the NPPF criteria): the site is overlooked by local property on all four sides and is very much sited in the heart of the Teddington community. The green space of Udney Park provides a healthy break in the built-up area of Central Teddington. The playing fields are part of the local as well as part of the wider Green Infrastructure network, and they play, and have the future potential to play, a significant role in the community. It is noted that the Quantum Group has granted a temporary licence to local sports teams, which is encouraged by local planning policies, such as LP 31.
- *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:* the playing fields are designated Other Open Land of Townscape Importance (OOLTI), and the associated OOLTI policy states that these areas will be protected in open use, and enhanced where possible. It is acknowledged that the OOLTI policy is a local policy concerned with the protection of open spaces that contribute to the importance of townscape and local character. Many of these are valued by residents as open spaces in the built up area. 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. In the case of Udney Park Playing Fields, a LGS designation would provide some additional 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 LGS designation on this site meets all of the criteria as set out in LP 13 of the Plan as well as in the NPPF and PPG.

In addition, the Udney Park Playing Fields have been considered and assessed within the Borough's Playing Pitch Strategy Assessment Report (SD-044), within which they are referred to as 'Imperial College (Teddington Sports Ground)'. This report, together with the Playing Pitch Strategy (SD-045) recognise that that the playing pitches at Udney Park are not widely used by the community currently (due to private ownership and use by Imperial College and Newland House School at that time) but the assessments confirm the need to protect and enhance the facility as without this space there would be a shortage of playing pitches in the borough to satisfy future needs and demand.

Furthermore, it should be noted that the Council has duly considered and discussed the merits of the LGS designation of this site at the Cabinet meeting on 13 December 2016, where the Publication Local Plan was agreed for public consultation by the Council; the minutes of this meeting, published on the [Council's website](#), provide further details.

Appendix 2 – Assessment of sports field at Lower Richmond Road, Mortlake as LGS

The application of the Mortlake Brewery Community Group' and Mortlake residents' submission for designation of the sports field at Lower Richmond Road, Mortlake as Local Green Space has been considered and assessed against the Policy LP 13 criteria (in paragraph 5.2.10 of the Local Plan) and the NPPF. The following sets out a detailed assessment of this site against *each criterion of LP 13 (set out in italics)*, which incorporates an assessment of the relevant NPPF criteria and guidance within the PPG on Local Green Space (paragraphs 005 to 022 of 'Open space, sports and recreation facilities'):

- *The site is submitted by the local community*: this criterion is considered to be partially met as the application has been submitted on behalf of the Mortlake Brewery Community Group. However, it is not clear as to the extent of how the application represents the views of the "Mortlake residents", including how these views have been gathered, and whether this refers to a particular community group or the wider residents as a whole.
- *There is no current planning permission which once implemented would undermine the merit of a Local Green Space designation*: this criterion is considered to be met as it is the case that there is no current planning permission for development on this site. The playing field is designated Other Open Land of Townscape Importance (OOLTI), and the associated OOLTI policy states that these areas will be protected in open use, and enhanced where possible. It is noted that the landowner has carried out pre-application consultations with the local community. Also see the Council's written statement to question 1, Hearing 8.
- *The site is not land allocated for development within the Local Plan*: this criterion is not met as the Local Plan allocates the site as part of SA 24 for wider comprehensive development. It is therefore considered that this proposed LGS designation is not consistent with the National Planning Practice Guidance as it is used in a way that undermines the aims of this Plan, particularly in relation to achieving site allocation policy SA 24 Stag Brewery.
- *The site is local in character and is not an extensive tract of land* (this corresponds with the third bullet point of the NPPF criteria): this criterion is considered to be met as the sport fields are existing playing fields within an urban setting. The site is 2.1 hectares and its boundaries are fenced or walled and formed by Williams Lane on two sides with a mixture of new housing and former brewery employee's dwellings, by the old brewery on the third side and the Lower Richmond Road on the fourth.
- *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 latter part of this criterion corresponds with the first bullet point of the NPPF criteria): the playing field is situated in the heart of Mortlake abutting the Lower Richmond Road, easily accessed on foot or public transport by the community. It is currently accessible to local sports clubs and schools with the owner's permission. Therefore, this criterion is considered to be met.
- *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), tranquillity or richness of its wildlife (this corresponds with the second bullet point of the NPPF criteria): whilst the application for the LGS designation mentions that the playing field has a rich and varied history and is the only remaining common field in Mortlake that has never been

built on, there does not appear to be demonstrable evidence setting out why this playing field in particular is special to the local community, e.g. for example because of its recreational value or beauty. It therefore appears that the main reason for the proposed LGS designation is to prevent any built development on this part in respect of the wider redevelopment proposal set out at SA 24 of the Plan.

- *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:* the playing field is designated OOLTI and the associated OOLTI policy states that these areas will be protected in open use, and enhanced where possible. It is acknowledged that the OOLTI policy is a local policy concerned with the protection of open spaces that contribute to the importance of townscape and local character. 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. Therefore, this policy is considered to be a strong and robust policy. The OOLTI policy recognises however that where a comprehensive approach to redevelopment can be taken, such as on major schemes or regeneration proposals, such as the Stag Brewery redevelopment (SA 24), it may be acceptable to re-distribute the designated open land within the site, provided that the new area is equivalent to or is an improvement in terms of quantum, quality and openness. Consequently, whilst any encroachment on or loss of the OOLTI at the Stag Brewery site will not be encouraged, the policy does allow for re-provision in certain instances (however, re-provision would have to be on site within SA 24 and not elsewhere in the Mortlake area). It is therefore acknowledged that the designation would provide some additional protection at a level that is similar to Green Belt and/or Metropolitan Open Land; however, this is contrary to the aims of policy SA 24 and could undermine the delivery of the Local Plan's Spatial Strategy, vision and objectives.

Based on the above, it can be concluded that the application for a LGS designation does not meet all of the criteria as set out in Policy LP 13. In particular, it is of concern that the proposed designation is contrary to the aims of SA 24, and in this instance, the OOLTI designation is considered to be sufficient.