

This document is submitted to the LBRUT Local Plan Public Examination by Mark Jopling, on behalf of the Friends of Udney Park Playing Fields and The Teddington Society, as a supplement to submission Reference 145 in the LBRUT Pre-Publication Consultation.

The Inspector asks in Hearing 5 "Are alterations to the Policies Map necessary?" This submission specifically relates to an important OOLTI War Memorial Park in Teddington called "Udney Park Playing Fields", additionally designated as a Local Green Space (LGS) in the Local Plan. There are 4 extra points of evidence to add since the Local Plan was published, based on emerging policy further protecting Green Infrastructure and so justifying the Local Plan alteration to Policy Map.

1. Protection for Green Belt and Local Green Space enhanced in UK Government Housing White Paper published on 7th Feb 2017

The Housing White Paper, published on 7th February 2017 gives clear direction to Local Authorities on the issue of Green Belt on p21:

- "making more land available for homes by maximising the contribution from brown field and surplus public land"
- "maintain existing strong protections for the Green Belt, and clarify that Green Belt boundaries should be amended only in exceptional circumstances when local authorities can demonstrate that they have fully examined all other reasonable options for meeting their identified housing requirements"

The Housing White Paper also has a clear direction to Local Authorities that certain sites are to be protected in development planning on p79: "At the heart of the National Planning Policy Framework is a presumption in favour of sustainable development.

For plan-making this means that:

a) local planning authorities should positively seek opportunities to meet the development needs of their area, through a clear strategy to maximise the use of *suitable* land; (italics added)

- specific policies in this Framework indicate where development should be restricted; Policies relating to land designated as Green Belt, Local Green Space, an AONB"

In summary, we believe the Feb 2017 Housing White paper further strengthens the case for alteration to the Policy Map that designated a 13 acre playing field as a Local Green Space. Whilst Udney Park was already a “strategic site” in the LBRUT Outdoor Recreation Assessment (adopted by LBRUT Cabinet in June 2015) the subsequent acquisition of the Playing Field by a developer who is aiming to reduce the pitch area available for community sport by circa 50%, further supports the case for extra protection afforded by a Local Green Space designation. **The LGS criteria are clear in NPPF Para 77 and specifically mention “playing fields”; Udney Park met the criteria comfortably.**

2. Protection for Green Belt and Local Green Space enhanced in draft London Environment Strategy, published in August 2017

The London Environment Strategy is clear that the assessment of the value of Green Infrastructure must take a broader economic view of all the environmental, social and public health benefits of parks, on p33:

“Green infrastructure and natural capital accounting

London’s green infrastructure – its parks, green spaces, trees, wetlands and green roofs – can reduce the impacts of climate change and help to store carbon. They can improve air quality and water quality. They can promote healthier lives, reduce car dependency and encourage more walking and cycling. They can improve biodiversity and ecological resilience. These benefits are economically valuable, but are not widely understood. Most organisations assess the value of their assets through conventional financial accounting, in which the economic benefits of green infrastructure are rarely assessed.

If green infrastructure does appear in financial accounts, it is often as a liability – accounting for the cost of maintaining a local park, rather than also taking into account the benefits the park provides to the local community and economy. This ignores the huge range of benefits green infrastructure can provide – from better physical and mental health and increased property prices to reduced flood and heat risk”

The current Mayor is also proposing increasingly strong protection for Outdoor Recreation Space in the London Environment Strategy”

“OBJECTIVE 5.1 MAKE MORE THAN HALF OF LONDON’S AREA GREEN BY 2050

Green infrastructure helps to make the city healthy, liveable and economically sustainable.

Policy 5.1.1 Protect, enhance and increase green areas in the city to provide green infrastructure services and benefits London needs now and in the future

Proposal 5.1.1a Through the new London Plan, the Mayor will protect the Green Belt, MOL and Green Space

The Mayor will resist development that results in the loss of Green Belt and Metropolitan Open Land. This will help fulfill their potential as strategic green infrastructure for London.

As the city grows, it becomes ever more important to protect green spaces to secure benefits provided by green infrastructure”

This August 2017 London Environment Strategy policy supports the previous Mayor who said in Mayors Question Time in July 2015:
“The London Plan policy is absolutely clear that you cannot have a loss of Open Space unless you have equivalent or better provision. I note that Udney Park Playing Fields were donated in 1937 specifically for use as rugby union pitches. It would be an absolute scandal and an outrage if that land was lost for that purpose”

In summary, we believe the London Environment Strategy consultation strengthens the case for alteration to the Policy Map that designated the 13 acre Udney Park Playing Field as a Local Green Space. The Mayor is clear that in assessing the value of green infrastructure the wider social and health benefits must be considered, which broadens the decision on the future for Udney Park Playing Fields **from**

- “more luxury apartments/less pitches for community sport” **to**
- “more luxury apartments/less of all the value from green space”.

London Boroughs are urged by the Mayor of London and the GLA to meet housing plans without building on Green Infrastructure, which underpins the LGS status on Udney Park. The CPRE “Space to Build” analysis from June 2017 shows clearly that London housing demand can be met without building on Green Belt/MOL/LGS land.

3. Countering the “lobbying and community engagement” by a well funded private-equity developer against Local Green Space

At the Second Consultation of the LBRUT Local Plan in January 2017 the current owner Quantum made concerted attempts to have the LGS status removed from the Local Plan. This was inappropriate given the scope of the Second Consultation was only to make comments on the technical soundness of the Plan. Quantum had made representations throughout 2016, as the LBRUT Council Leader confirmed after the Cabinet Meeting which approved the draft Local Plan in Dec 2016: **“we heard strong arguments from both sides, Quantum knew they were buying green space in a Borough which protects its green spaces”**

On 29/1/17, a newly formed local Community Interest Company formed by 2 Directors involved in local clubs (and co-funded by Quantum) passed on the following message in an email to the membership of the clubs the 2 CIC Directors were also part of. This PR was part of a heavily coordinated attempt to raise objections against LGS that were lodged in the Second Consultation, under threat of the playing fields being closed by Quantum:

“What Will Happen if the area IS Designated as “Local Green Space”?”

Quantum has informed us that the TAFC lease will be terminated and all community use of the site will stop. Quantum will, no doubt, continue to progress plans for development, but it is unlikely that this process will be as cooperative as has been the case to date. If Quantum is unable to secure planning consent, then the site is likely to remain dormant for a number of years while its future is decided by legal and commercial considerations”

Many members of these two clubs that share Directors with the CIC were horrified to be pressured in this way to give support for a controversial scheme to carve up a playing field by challenging the LGS status in a public consultation.

In addition, early in 2017 the local GP surgery asked its patients if they preferred a new surgery on Udney Park Playing Field or a specific alternative brown field site in central Teddington and from around 1000 replies the preference against building on a Udney Park Playing Field was around 3.5:1.

Further new data emerged in 2017 via Freedom of Information request

that highlighted the need to protect Udney Park. Current owners Quantum issued an Investment Prospectus which is clear that their intentions for outbidding community groups and acquiring Udney Park are to convert land at an acquisition value of £6m (= <£500k/acre) to land with local “Comparable Transactions” in a range of development values of approximately £2.6m to £19.8m/acre, which they achieve by:

“The objective of the project is to purchase the site unconditionally, lodge a planning application for redevelopment of the site, and undertake lobbying and community engagement in order to assist in securing planning consent”

The developer states in their Prospectus that buying Udney Park is:

“is a speculative development opportunity, as the proposed application will be non-compliant to planning policy”.

The developer has taken a speculative risk in full knowledge that their aims are “non-compliant to policy” and that they intend to break layers of National, Regional and Local Planning Policy to make an abnormally high return on investment by building on playing fields. The developer has a massive incentive to lobby very hard for community support, favourable designation of the playing field as development land and ultimately planning approval.

It is important to counter the current owners extensive “lobbying and community engagement” that seeks to justify a circa 50% reduction in the area available for community sports, when instead there is clear demand that 100% of Udney Park can be a thriving Local Green Space for the Teddington community without a property developers carve up. A local Cllr Stephen Knight said **“do not believe for one second that Quantum attempting to partner with local clubs is anything other than camouflage for their grubby little land deal”**.

4. The Planning Inspector at the Examination of the Redbridge Local Plan ruling protects playing pitches

In September 2017 the Inspector of the Redbridge Local Plan (IED012) gave clear direction that the Oakfield and Ford Sports Grounds should NOT be considered Opportunity Sites for built development, given the calculations on Playing Pitch capacity from Sport England showed the playing fields were not surplus to requirements and that the Redbridge LP had not replaced with them equivalent provision.

(NB Oakfield and Ford Sports Grounds, large Green Belt playing fields similar in scale to Udney Park, were controversially proposed as Opportunity Sites in the Redbridge LP. The local community, Sport England and the GLA successfully challenged the Opportunity Site designation. Redbridge Council has now accepted the Inspectors guidance and will not seek to justify building on these playing fields)

Unlike the pre-Exam draft Redbridge LP, the Richmond LP Policy Map shows consistency through the Playing Pitch strategy and Policy Map. The Redbridge LP Inspector upholds NPPF 74; “playing fields should not be built on”. Whilst we respect that each LP has to be sustainable in totality against many dimensions, the Redbridge LP precedent that protects playing pitches is a relevant comparator for Udney Park: Oakfield & Ford Sports Grounds are Green Belt and Udney Park is LGS, and NPPF 78 states “local policy for managing development within LGS should be consistent with policy for Green Belts”.

Conclusion: the proposed future of Udney Park Playing Fields

There is an alternative “Plan B” for Udney Park Playing Fields, potentially involving many more sports clubs, local organisations and schools that have unmet demand for 100% of the Outdoor Recreation capacity at the site (this demand is already reflected in the Sport England methodology that led to the 2015 LBRUT Outdoor Recreation Assessment and Playing Pitch Strategy). The local community has a large and passionate interest in protecting Udney Park Playing Fields.

To conclude this supplementary submission, three new 2017 pieces of evidence here enhance the necessity of the alteration to the Policy Map and the importance of LGS status when the site is currently controlled by an owner intent on large profit arising from breaking planning policy.

After a nomination from 2 large community bodies, LGS was correctly granted to Udney Park per NPPF Para 76. The 2017 National and GLA policies further support LGS status of Udney Park in the Policies Map.

Appendix The emergent Plan B showing 100% retention of Green Infrastructure at Udney Park, delivering the LBRUT Outdoor Recreation Analysis and fulfilling the Local Green Space designation.

Udney Park Playing Fields “Plan B”



- 100 % Local Green Space for the Community:
- Owned & operated as a Charity
 - Open to all
- Maintains original covenanted pitch capacity enjoyed for decades

*including (not limited to): Bushy Park Girls CC, Hearts FC, Revolution Tennis, Quins the Scouts, Teddington CC, Teddington Athletic FC, Teddington Hockey Club, TRFC

Help us make it happen!!