

LONDON BOROUGH OF RICHMOND-UPON-THAMES LOCAL PLAN

A STATEMENT BY THE OLD DEER PARK WORKING GROUP FOR PRESENTATION AT THE RELEVANT HEARING SESSION OF THE INSPECTOR'S EXAMINATION, BASED ON THE GROUP'S EARLIER SUBMISSIONS TO THE COUNCIL, SEPTEMBER, 2017

1. INTRODUCTION

- 1.1 The Old Deer Park Working Group comprises representatives of The Richmond Society, The Kew Society, The Friends of Richmond Green, The Friends of Old Deer Park and The St Margaret's Estate Residents Association. Details of each of the groups are attached in Appendix A.
- 1.2 This statement conveys the concerns of the Working Group regarding the soundness of a number of specific aspects of the Council's final version *Richmond-upon-Thames Local Plan* relating to the Old Deer Park, Richmond. The statement focuses on those aspects of the Council's *Plan* which the Group considers are insufficiently robust in providing the Council, as local planning authority and the local community with effective control over development affecting the particular architectural, historic and landscape significance of the Old Deer Park as a designated heritage asset in the terms commended in the relevant parts of the *National Planning Policy Framework*.
- 1.3 In Section 3 of this Statement, the Working Group has set out its concerns about the soundness of specific aspects of the *Plan* relating to the particular definition of boundaries in the *Proposals Map* insofar as they relate to the Old Deer Park; to the wording of some of the policies of the *Plan* insofar as they relate to the Park; and to the wording of two of the site-specific proposals which relate directly to the Park. In each case, the Group has explained the reasons for its concerns, and put forward its suggestions as to the potential means of addressing the weaknesses of the *Plan* as presently submitted and securing modest amendments which will contribute to providing a sounder statement of Policy insofar as is necessary to ensure that the significance of the Old Deer Park as a designated heritage asset will be assured.

2. THE BACKGROUND TO THE WORKING GROUP'S STATEMENT

- 2.1 In July, 2012, the Group prepared and published a report - *The Old Deer Park, Richmond – Re-connecting the Town to its local park – Realising an under-recognised parkland asset – A framework for future conservation and enhancement*. A copy of the report is attached as Appendix B. The report was intended to provide a positive contribution to discussion and debate in anticipation of the falling-in (in April, 2016) and

potential renewal of all but two of the existing leases granted by the Crown Estate for the land comprising the Old Deer Park, Richmond.

- 2.2 Over many years, many living and working in Richmond, Kew and St Margaret's had expressed substantial interest in the effective conservation and enhancement of the Park and have attached considerable value to its amenity, and its particular character and historic, landscape and ecological interest and significance. Accordingly, the Working Group believed that it was timely to set out the corporate views of its constituent bodies on the opportunities that would arise and its keen hope that the Crown Estate would progress the future management of its Old Deer Park estate with a view to assuring its effective conservation and enhancement in addition to its continued use for outdoor sports and recreational activity by the local community.
- 2.3 Importantly, the Working Group was concerned that any development that might be advanced within the area should not only be sustainable in the fullest sense but also consistent with the designation of the Park as a conservation area and its inclusion on English Heritage's *Register of Parks and Gardens of Special Historic Interest* and in the buffer-zone of the *Royal Botanic Gardens Kew World Heritage Site*. In addition, the Group believed that high priority should be given to improving and enhancing physical links between the Town and the Park and suggested a number of measures that might be delivered relatively easily and inexpensively.
- 2.4 Importantly, too, the Working Group also raised concerns regarding significant anomalies regarding the definitions of a number of boundaries relating to the Old Deer Park shown in the Council's *Local Development Framework Proposals Map, Adopted November, 2011*.
- 2.5 Such concerns were set out in detail and justified in the Working Group's report *The Old Deer Park, Richmond - Re-connecting the Town to its local park - Realising an under-recognised parkland asset - A framework for future conservation and enhancement – A submission urging review of boundary definitions* in February, 2013.
- 2.6 In November, 2013, the Working Group set out its formal response to consultation by the Council on its pre-publication version of the *Richmond-upon-Thames Local Plan, Site allocations plan*, published in October, 2013. The substantive part of the concerns of the Working Group about each of the three sites related directly but not exclusively to the significant anomalies in the definitions of boundaries relating to the Old Deer Park shown in the Council's *Local Development Framework Proposals Map, Adopted November, 2011*, as had already been highlighted in the Group's submission of February, 2013.
- 2.7 In July, 2014, the Working Group set out its formal response to consultation by the Council on the pre-publication version of *The Richmond-upon-Thames Local Plan, Site Allocations Plan – New Additional Sites, June, 2013*. Once again, the Working Group

stressed its concerns about the significant anomalies in the definitions of boundaries relating to the Old Deer Park shown in the Council's *Local Development Framework Proposals Map, Adopted November, 2011*.

- 2.8 In August, 2016, the Working Group set out its formal response to consultation by the Council on the first draft, pre-publication version of *The Richmond-upon-Thames Local Plan*, published in July, 2016. In this response, the Working Group stressed its continuing concerns about the significant anomalies in the definitions of boundaries relating to the Old Deer Park shown in the Council's *Local Plan Proposals Map* – unchanged from those shown in the *Local Development Framework Proposals Map, Adopted November, 2011*.
- 2.9 Finally, in February, 2017, the Working Group set out its formal response to consultation by the Council on its final, publication version of the *Richmond-upon-Thames Local Plan*, published in January, 2017. Once again, the Working Group stressed its continuing concerns about the significant anomalies in the definitions of boundaries relating to the Old Deer Park shown in the Council's *Local Plan Proposals Map, Adopted July, 2015* – still unchanged from those shown in the *Local Development Framework Proposals Map, Adopted November, 2011*.
- 2.10 In this submission, the Working Group observed that a note had 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 *First Draft of the Local Plan* – thus the earlier concern expressed by the Group regarding the absence of a draft, amended *Proposals Map*.
- 2.11 The Working Group went on to observe that given the fundamental significance of the *Proposals Map* in securing a sound understanding and appreciation of the policies and site-specific proposals set out in the Final Version of the *Local Plan* and their potential application, the Group remained of the view that the draft, amended *Proposals Map* 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 *Local Plan*.
- 2.12 Subsequently, the Group has noted with disappointment that the Council's 32-page document - *Proposals map changes, Local Plan, Publication version for consultation, 4th January – 15th February, 2017* – provided for no amendment to any of the boundaries relating to the Old Deer Park, noting that it specifically excluded the site-specific allocations set out in the main publication version *Local Plan* at Section 12, and stated unequivocally at paragraph 1.4: 'The Proposals map (2015) will be retained unless indicated otherwise. As such all other designations remain unchanged'.

- 2.13 In addition and importantly, over the last two years the Working Group has been actively engaged with Council officers in discussions and written exchanges in connection with the emerging *Supplementary Planning Document* for the Old Deer Park (otherwise referred to at earlier stages by the Council as a 'Village Plan' and as a 'Planning Brief'). Such engagement has included the submission in November, 2016 of a formal response to the Council's consultation on the development of a *Supplementary Planning Document for the Old Deer Park*, published in October, 2016. A copy of the Working Group's submission is attached as Appendix C.
- 2.14 In this submission, the Working Group drew attention to a number of specific errors in the definition of some of the boundaries shown in the draft document and once again expressed concern regarding the significant anomalies in the definitions of the boundaries extrapolated from the Council's *Local Plan Proposals Map, Adopted July, 2015*; stressing that such anomalies in the relevant boundary definitions should not be perpetuated in the *Old Deer Park SPD* before the Council's *Local Plan Proposals Map* had been properly addressed and resolved in the light of the Working Group's consistent representations and formal examination of the overall *Richmond-upon-Thames Local Plan*. In recent months, the Working Group has been reassured by the Council's planning consultants that the specific errors will be corrected and a number of other matters resolved. However, the Group is concerned that one of the two maps proposed for inclusion in the final version of the *SPD* – that showing land-use designations – may perpetuate the anomalies in the boundaries to which the Working Group has repeatedly referred to.

3. THE KEY ISSUES

THE PROPOSALS MAP (Council references 29 and 113)

- 3.1 The Working Group observes that a note was added to the published version of the Local Plan 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 *First Draft of the Local Plan* – thus leading to the earlier concern expressed by the Group regarding the absence of a draft, amended *Proposals Map*.
- 3.2 Given the fundamental significance of a *Proposals Map* in securing a sound understanding and appreciation of the policies and site-specific proposals set out in the final version of the *Local Plan* and their potential application, the Group urges the Inspector to address the boundary-related issues affecting the Old Deer Park to which the Working Group has repeatedly referred in its submissions to the Council as an

integral part of his formal examination the Council's *Local Plan* and to recommend the appropriate amendments to the relevant boundaries shown in the *Proposals Map*.

THE BOUNDARIES OF METROPOLITAN OPEN LAND, PUBLIC OPEN SPACE AND THE RICHMOND TOWN CENTRE (Council reference 481)

- 3.3 The Working Group notes with considerable regret the continuing resistance of the Council to address and resolve the significant and longstanding anomalies in the boundaries of Metropolitan Open Land, Public Open Space and the Richmond Town Centre insofar as they relate to the Old Deer Park as shown on the current and earlier *Proposals Maps*. The Group does not accept the reasons stated by the Council for repeatedly rejecting the need to address and resolve these significant anomalies and believes that the present definition of the boundaries remains entirely unsound, as stated and justified consistently by the Working Group since 2012.

METROPOLITAN OPEN LAND

- 3.4 The greater part of the Park, including the Richmond Athletic Association Ground, the Old Deer Park Car-park and the former and now derelict Public Conveniences and British Legion buildings immediately adjacent, has long been rightly designated as Metropolitan Open Land. However, entirely anomalously, the MOL designation excludes the listed, Council-owned *Pools-on-the-Park* complex, its landscaped grounds and the adjacent car-park, together with the carriageway and footways of the Twickenham Road, despite the inclusion of all these areas within the grade I *Royal Botanic Gardens Kew Registered Park* and the buffer-zone of the *Royal Botanic Gardens Kew World Heritage Site*, and despite repeated representations by groups in the local community over the last thirty or more years. Anomalously too, the present MOL designation also excludes the land to the immediate south of the Old Deer Park Car-park on which the single-storey, utility buildings occupied by voluntary groups presently stand.
- 3.5 The Working Group urges the Inspector to recommend that the boundaries of the Metropolitan Open Land within the Park should be amended to include these areas given that they are wholly consistent in their function and open character to the adjacent parkland areas which are properly designated as MOL, and that they are consistent with the definitions of Metropolitan Open Land given in the *London Plan, 2016* and in the *Richmond-upon-Thames Local Plan* itself. Importantly, none of the roads in the Borough's other major historic parks – Richmond and Bushy Parks are similarly excluded from designation as MOL.

PUBLIC OPEN SPACE

- 3.6 The greater part of that park leased by the Council from the Crown Estate has long been rightly designated as Public Open Space. However, entirely anomalously, the POS designation excludes the extensive landscaped grounds which form the immediate

setting of listed, Council-owned *Pools-on-the-Park* complex and the adjacent car-park, which enjoys unrestricted public access, despite their inclusion within the grade I *Royal Botanic Gardens Kew Registered Park* and the buffer-zone of the *Royal Botanic Gardens Kew World Heritage Site*, and despite repeated representations by groups in the local community over the last thirty or more years.

- 3.7 The Council-owned Old Deer Car-park is located in that part of the Old Deer Park closest to The Green and at the principal entry-points to the Park for pedestrians from the northern corner of The Green and the western end of Park Lane. It presents an open and partly landscaped character and appearance, enjoys unrestricted public access and is in public ownership (through the Council as a lessee of The Crown Estate). It is located entirely within the formally designated *Old Deer Park Conservation Area* and the grade I *Royal Botanic Gardens Kew Registered Park*. Despite these major factors, wholly anomalously, the entire car-park site is presently excluded from designation as Public Open Space. Importantly, none of the car-parks in the Borough's other major historic parks – Richmond and Bushy Parks are similarly excluded from designation as Public Open Space.
- 3.8 The Working Group urges the Inspector to recommend that the boundary of Public Open Space within the Park should be amended to include the extensive landscaped grounds which form the immediate setting of the listed, Council-owned *Pools-on-the-Park* complex and the adjacent car-park and the Old Deer Park Car-park given their open and landscaped character, their accessibility to the public, and their consistency with the definitions of *Public Open Space* given in the in the *Richmond-upon-Thames Local Plan* itself.

RICHMOND TOWN CENTRE

- 3.9 The Working Group notes that wholly anomalously, the entire area of the Old Deer Park Car-park, the land to the immediate south of the Old Deer Park Car-park extending down towards the railway (on which the single-storey buildings occupied by voluntary groups stand); and the Royal Mail Depot and former TA Centre are identified as forming part of the designated *Richmond Town Centre* despite their falling within the surviving historic boundary of the Old Deer Park, despite their inclusion within the grade I *Royal Botanic Gardens Kew Registered Park*, despite their location on the north side of the deep railway-cutting that separates the Park from The Green and the historic heart of the Town, despite the designation of the Car-park as Metropolitan Open Land, and despite repeated representations in past years by groups in the local community questioning the designation of this part of the Park within an *Area of mixed use*. The present, anomalous designation clearly prejudices its protection from inappropriate urban development, as reflected in proposals submitted in recent years for the development of a below-ground supermarket located below a 'green blanket'.

- 3.10 The Working Group urges the Inspector to recommend that the Old Deer Park Car-park, the land to the immediate south of the Old Deer Park Car-park extending down towards the railway (on which the single-storey buildings occupied by voluntary groups stand); and the Royal Depot and former TA Centre, should be removed from the boundary of the Richmond Town Centre.

THE BOUNDARIES OF METROPOLITAN OPEN LAND, PUBLIC OPEN SPACE AND THE RICHMOND TOWN CENTRE - SUMMARY

- 3.11 In summary, the Group urges the Inspector to recommend that the relevant boundaries should be amended as follows:

- To include the listed *Pools-on-the-Park* swimming pools complex and its landscaped grounds and adjacent car-park; the land to the immediate south of the Old Deer Park car-park extending down towards the railway (on which the single-storey utility buildings occupied by voluntary groups presently stand); and the carriageway and footways of the Twickenham Road, as Metropolitan Open Land.
- To include the listed *Pools on the Park* swimming pools complex and its landscaped grounds and adjacent car-park; the entirety of the Old Deer Park Car-park; the land to the immediate south of the Old Deer Park Car-park extending down towards the railway (on which the single-storey buildings occupied by voluntary groups stand); as Public Open Space.
- To remove the Old Deer Park Car-park; the land to the immediate south of the Old Deer Park Car-park extending down towards the railway (on which the single-storey buildings occupied by voluntary groups stand); and the Royal Mail Depot and former TA Centre from designation as part of the Town Centre.

The existing boundaries of all these areas are shown on the Council's *Local Plan Proposals Map, Adopted July, 2015*, and in outline of the Working Group's *The Old Deer Park, Richmond – Re-connecting the Town to its local park – Realising an under-recognised parkland asset – A framework for future conservation and enhancement*. A copy of the report is attached as Appendix B.

THE ABSENCE OF REFERENCES TO THE OLD DEER PARK, RICHMOND: THE CROWN ESTATE LANDSCAPE STRATEGY (Council references 113, 118, 448 and 451)

- 3.12 The Group views with considerable regret the continuing resistance of the Council to include references to *The Old Deer Park, Richmond: The Crown Estate Landscape Strategy* under Policy LP 5 – Views and vistas, Policy LP 6 – Royal Botanic Gardens, Kew World Heritage Site, Site specific proposal SA 22 – Pools on the Park and surroundings, Old Deer Park, Richmond, and Site specific proposal SA 23 – Richmond Athletic Association Ground. Old Deer Park, Richmond.

3.13 The Group does not accept the reasons stated by the Council for the continuing omission of references to this most important and still highly relevant conservation and planning document – not least, given the references to the similar *Royal Botanic Gardens Kew World Heritage Site Management Plan* and the *Royal Botanic Gardens Kew Landscape Management Plan*. Whilst the Group notes that the *Crown Estate Landscape Strategy* contains limited references to planning policies that have now been superseded in the very brief Section 10, the substantial part of the document remains highly relevant, it sees no reason why references cannot be made to the document, with a brief note regarding the policies cited in Section 10. The Group urges the Inspector to address this significant omission and recommend the inclusion of references to *The Old Deer Park, Richmond: The Crown Estate Landscape Strategy*.

THE WORDING OF POLICIES LP 6 AND LP 14 (Council references 118 and 168)

3.14 The Working Group notes with considerable regret the continuing resistance of the Council to amend the wording of new Policy LP 6 – Royal Botanic Gardens Kew World Heritage Site to recover reference to ‘working with others’ and to include reference to *The Old Deer Park, Richmond: The Crown Estate Landscape Strategy*. The Group urges the Inspector to address these omissions and recommend their resolution, given the clear need for effective participation by the Crown Estate, leaseholders, national and other agencies and local community groups in the care, conservation and management of the World Heritage Site and its buffer-zone in order to secure the policy objective.

3.15 The Group notes with considerable regret the continuing resistance of the Council to amend – in the interests of clarity and certainty - the wording of new Policy LP 14 – Other Open Land of Townscape Importance to amend the heading of the policy and the relevant parts of the policy to refer to ‘Other open land of townscape and landscape importance’. Such a modest adjustment would extend appropriate protection to open land within the Park (and in other parts of the Borough) which falls outside Metropolitan Open Land designation but nevertheless possesses particular landscape interest and significance (as distinct from ‘townscape interest’. The Group urges the Inspector to address this issue and recommend that the heading and wording of the policy should be amended accordingly.

THE WORDING OF SITE-SPECIFIC PROPOSALS SA 22 AND SA 23
(Council references 448 AND 451)

3.16 Whilst noting that detailed guidance on the potential development of the respective sites will be provided in the proposed *Old Deer Park Supplementary Planning Document*, the Working Group notes with considerable regret the continuing resistance of the Council to amend the wording under both Site-specific Proposals SA 22 – Pools on the Park and surroundings, Old Deer Park, Richmond and SA 23 –

Richmond Athletic Association Ground, Old Deer Park, Richmond - as urged by the Group in its formal submission of August, 2016.

SITE SPECIFIC PROPOSAL SA 22

- 3.17 In relation to Site-specific Proposal SA 22 relating to the Pools-on-the Park complex, the Group remains concerned by the absence of wording to the effect that any proposed improvements or upgrading of the existing facilities and any additional leisure facilities, community and other complementary uses should ensure the preservation of the special interest of the existing listed complex and its setting, and sustain their significance; preserve or enhance the character or appearance of the conservation area and the World Heritage Site buffer-zone, and sustain their significance; and respect the parkland character of the adjacent Metropolitan Open Land, avoiding encroachment into the area beyond the boundary of the site and the existing public sports changing-rooms and club-room building and the largely redundant and derelict Council maintenance-depot for the Park. The Group also remains concerned by the absence of wording to the effect that any proposed development should have full regard to the relevant policies set out in the Crown Estate's *The Old Deer Park Richmond – Landscaping Strategy*.
- 3.18 In the interests of clarity and certainty, the Group urges the Inspector to recommend appropriate amendment of the wording of the proposal.

SITE SPECIFIC PROPOSAL SA 23

- 3.19 In relation to Site-specific Proposal SA 23 relating to the Richmond Athletic Association ground, the Group remains concerned by the absence of wording to the effect that any proposed improvements or upgrading of the existing facilities and any additional leisure facilities and other complementary uses should ensure the preservation of the special interest of the existing listed pavilion/grandstand and its setting, and sustain their significance; preserve or enhance the character or appearance of the conservation area and the World Heritage Site buffer-zone, and sustain their significance; and respect the parkland character of the Metropolitan Open Land, avoiding encroachment into the area beyond the boundary of the site.
- 3.20 In the light of significant unauthorised development, both today and in the past, the Working Group also remains concerned by the absence of wording to the effect that only car-parking directly relating to the primary use of the site for recreation use shall be permitted and should be extensively landscaped to reflect the significant location of the site within the Park, and that the potentially adverse effects of any floodlighting of pitches should be mitigated in order to protect the significance of the site as an integral part of the Old deer Park and the amenity of nearby local residents. The Group is further concerned by the absence of wording to the effect that any proposed development should have full regard to the relevant policies set out in the

Crown Estate's *The Old Deer Park Richmond – Landscaping Strategy*. In the interests of clarity and certainty, the Group urges the Inspector to recommend appropriate amendment of the wording of the proposal.

4. ADDITIONAL NOTE

4.1 The Working Group remains entirely willing to provide copies to the Inspector of any of its submissions to the Council and to clarify any of the issues it has raised in this submission. In addition, the Group would wish to encourage the Inspector to undertake a site inspection of key parts of the Old Deer Park in order to appreciate its considerable architectural, historic and landscape interest and significance, and to recognise the need to ensure that sound policies are in place to ensure that such interest and significance will be effectively sustained in accordance with the relevant policies of the *National Planning Policy Framework*.



Paul Velluet
2017.

4th September,

APPENDIX A - THE CONSTITUENT MEMBERS OF THE WORKING GROUP

THE RICHMOND SOCIETY

The Richmond Society was founded in 1957 and has a long established reputation for positive engagement in local conservation, development and planning issues. The Society has charitable status and has approaching one thousand paid members, generally without restriction. The Society encourages an active interest in Richmond and its community. It is run by a committee of volunteers who communicate with members through regular newsletters and meetings. Its interests include the natural and built environment, infrastructure which includes roads, transport and aircraft, and uses of Richmond town and surrounds in terms of licensing, policing, cleansing and events. The Society campaigns to preserve and enhance Richmond's historic character and the quality of life for residents and visitors. It arranges events for social interaction and enjoyment of its members and the public. It works with other amenity groups and the Council and other public bodies. It covers no defined geographical area but focuses on Richmond Town and its surrounds, including the associated stretch of the River Thames. It has sound finances and raises funds from subscriptions, legacies and campaigns. The money raised is used to run the charity and to invest in projects that benefit the community.

THE KEW SOCIETY

The Kew Society, founded more than one hundred years ago, is an influential organisation dedicated to enhancing the beauty of Kew and preserving its heritage. It became a Society in the 1970s and a Registered Charity in 1987 and remains as one of the larger and more active community groups in Greater London, with a subscribed membership of around six hundred. Its main aims are to review all planning applications in Kew with special regard to the architectural integrity and heritage of the neighbourhood and to play an active role in the improvement of local amenities. To achieve its aims, The Kew Society works closely with local authority councillors and the Member of Parliament; monitors all the planning applications and comments as needed; makes representations to public and private organisations; and provides a forum for local groups to strengthen Kew's voice in the area and in London. The Society is run by unpaid volunteers. The Executive Committee meets eleven times a year while sub-committees look after particular areas of interest. The society organises community events including parties, picnics, lectures and outings and produces the *On Kew* newsletter with information about general local issues, events, planning matters and forthcoming activities.

THE FRIENDS OF RICHMOND GREEN

The Friends of Richmond Green is an amenity action group. It operates for the benefit of residents located in the immediate vicinity of The Green. In geographical terms, the FoRG 'constituency' encompasses the area bounded by the triangle of the railway line, the river

Thames and George Street. Its key aims and objectives are: To promote public interest and civic pride in Richmond Green and vicinity; To improve the quality of life and long-term attractiveness for residents; To improve the character and quality of the built and natural environments; and To encourage responsible use of The Green and surrounding area. FoRG was started over forty years ago and has worked with the Council and other local groups on a number of projects – major improvements to the pedestrian Gateway to Richmond between Old Deer Park and Richmond Green; the up-grading of the network of paths on the Green. The RHC, convened by Friends of Richmond Green and the Richmond and Kew Societies, amalgamates and co-ordinates the efforts of the three bodies to more effectively represent our mutual interests as far as Heathrow expansion and related proposals are concerned. FoRG successfully lobbied the Council to revise the daily timetable for litter collection and in the last couple of years we have seen major improvements in this area. Membership is open to any person who resides in the immediate vicinity of the Green. We do not currently levy any form of charge on our members. Management is vested in an Executive Committee which meets around 8 times a year. The committee and officers are elected each year at an AGM. A newsletter is produced annually.

THE FRIENDS OF OLD DEER PARK

Established in 1987, The Friends of Old Deer Park is a group within the local community constituted with the overall aims of fostering, promoting and sustaining recognition and appreciation of the unique parkland character, amenity value, and particular historic, architectural, archaeological and ecological interest of the Old Deer Park, and securing its preservation and enhancement for the benefit of all. The Friends played an important role in supporting the establishment of the working group for *The Thames Landscape Strategy* in 1991, and successfully worked for and secured the designation of the Old Deer Park by the London Borough of Richmond upon Thames Council as a conservation area in June, 1990, the inclusion of the Old Deer Park on English Heritage's *Register of Parks and Gardens of Special Historic Interest* (as an integral part of the already registered grade I Royal Botanic Gardens, Kew historic landscape) in June, 1998, and its inclusion within the buffer-zone of *The Royal Botanic Gardens, Kew World Heritage Site* in 2003, and the listing of the 1960s *Richmond Swimming Pools* complex in January, 1996, and the late-Victorian sports pavilion/grandstand in the grounds leased by *Richmond Athletic Association* in November, 1997.

THE ST MARGARET'S ESTATE RESIDENTS ASSOCIATION

The St Margaret's Estate Residents Association was established some forty years ago to protect and conserve the area that originally covered the St Margaret's Estate of 1854. The Association includes approximately 330 houses, mainly within the area bounded by the A316, St Margaret's Road, Kilmorey Road and Ranelagh Drive which looks over the river onto the Old Deer Park. The main remit of the Association is to monitor all planning applications within the boundaries of the Association and it also monitors tree lopping and felling, traffic, aircraft noise and any other matter that affects the environment.

AN EMERGING PLANNING FRAMEWORK FOR THE OLD DEER PARK, RICHMOND

A RESPONSE BY THE OLD DEER PARK WORKING GROUP TO THE COUNCIL'S CONSULTATION ON THE DEVELOPMENT OF A SUPPLEMENTARY PLANNING DOCUMENT FOR THE OLD DEER PARK

4TH NOVEMBER 2016

1. INTRODUCTION

- 1.1 The Old Deer Park Working Group (the Group) comprises representatives of The Richmond Society, The Kew Society, The Friends of Richmond Green, The Friends of Old Deer Park and The St Margaret's Estate Residents Association. This submission represents the joint response from the five groups.
- 1.2 The Group welcomes the publication and consultation on an emerging Supplementary Planning Document (the Consultation Document) for the Old Deer Park, and welcomes many aspects of the document and the opportunity of commenting on both these and others where the Group has significant reservations.
- 1.3 The Group was formed in 2012 in recognition of the importance of the Old Deer Park and has since been working on immediate issues and on encouraging the preparation of a coherent strategy for the effective conservation, development and management of the Park. The Group started by publishing the report: *The Old Deer Park, Richmond - Re-connecting the Town to its local park - Realising an under-recognised parkland asset – A framework for conservation and enhancement*.
- 1.4 We have since been in discussion with the Council, Crown Estate and other stakeholders. Our emphasis has been on lease renewals for various parts of the Park, boundary designations (such as Metropolitan Open Land) and some initial projects (some of which, such as signing, are briefly described in the Consultation Document under the heading 'Opportunities for Environmental/Accessibility Improvements'). We have also been considering various longer term options for the Park along the lines referred to in the Consultation Document as 'Ideas' for each of the several Park areas while adopting an integrated approach to the Park as a whole.
- 1.5 Our submission here is therefore based on the evidence and work that we have done so far. In addition to including answers to the specific tick-box questions we provide sections on Wider Issues plus Expanded Statements for the 20 Consultation questions. The Council's Consultation Document is reproduced for completeness as an Annex in the PDF version but not the word.doc version of this submission.
- 1.6 Our comments on the Consultation Document should be read in conjunction with our aforementioned report and comments about key aspects of the existing and proposed designations and policies relating to the Old Deer Park set out in previous, formal submissions to the Council.
- 1.7 The Group would be pleased to discuss its submission with the Council and to provide further information, if requested.

Contact: Peter Willan, Chair - The Old Deer Park Working Group. willan829@btinternet.com

2. WIDER ISSUES

- 2.1 In June, 2012 the Group published the report: *The Old Deer Park, Richmond - Re-connecting the Town to its local park - Realising an under-recognised parkland asset – A framework for conservation and enhancement.*
- 2.2 The Group's aim in publishing its original report in 2012 was to provide a positive contribution to discussion and debate in the context of the falling-in and renewal of all but two of the existing leases granted by the Crown Estate for the land comprising the Old Deer Park, Richmond. Details about each of the local groups who made up the Group and their objectives were set out in Appendix 1 of the report. Copies of the report were circulated to the Crown Estate, Council members and officers, representatives of the respective lessees, and to English Heritage, and made available to the broader community. Since publication, the findings and recommendations of the report have been discussed at meetings with the Crown Estate and Council members and officers. A copy of the report is available on the Richmond Society's web-site. www.richmondsociety.org.uk
- 2.3 This submission follows formal submissions by the Group to the Council (also available on the Richmond Society's website):
- a. February 2013: *The Old Deer Park, Richmond - Re-connecting the Town to its local park - Realising an under-recognised parkland asset – A framework for conservation and enhancement - A submission urging review of boundary definitions;*
 - b. November 2013: A response to the Council's consultation on the pre-publication version of *The Richmond-upon-Thames Local Plan, Site Allocations Plan* published in October, 2013;
 - c. July 2014: A response to the Council's consultation on the pre-publication version of *The Richmond-upon-Thames Local Plan, Site Allocations Plan – New Additional Sites, June, 2014;*
 - d. August 2016: A response to the Council's consultation on the pre-publication version of the first draft of the *London Borough of Richmond-upon-Thames Local Plan.*

3. SIGNIFICANT ANOMALIES IN THE CURRENT CONSULTATION DOCUMENT

- 3.1 As raised with Councillor Pamela Fleming and the Council's Ms Nicky Linihan at the Richmond Society's Forum Meeting held at the Richmond Adult College on the evening of Thursday 20th October, there are a number of significant and potentially misleading anomalies and omissions in the information shown in the present Consultation Document in relation to both the mapping information and the texts. The Group welcomes Ms Linihan's acknowledgement of the mapping errors and looks forward to their being remedied at the earliest opportunity.

3.2 THE BOUNDARY OF THE OLD DEER PARK CONSERVATION AREA AND THE INDICATIVE SPD BOUNDARY (AND THE AREAS DESIGNATED AS METROPOLITAN OPEN LAND AND HISTORIC PARK)

The small-scale map on the second page of the Consultation Document shows an unexplained indent in the boundary of the Old Deer Park along Kew Foot Road between Shaftesbury Road in the north-east and St John's Grove in the south-west, corresponding to those adjoining parts of the Richmond Athletic Association's ground occupied by Cannons Health and Squash Club and used by Falcon's Preparatory School – the site formerly occupied by Richmond Town Bowling Club – effectively and incorrectly excluding the area from inclusion within the boundaries of the Old Deer Park Conservation Area and the formally designated Historic Park and Metropolitan Open Land, as shown in the *Local Plan Proposals Map* of July, 2015, the formal conservation area designation map of June, 1990, as subsequently amended in November, 2005, and the formal Historic Park and Garden designation map of October, 1987. This significant mapping error needs to be resolved at the earliest opportunity given the potentially serious implications for the sound conservation and planning of the area.

3.3 The Group notes that the maps on the first and second pages of the Consultation Document suggest that the proposed boundary for the SPD follows that of the existing Old Deer Park Conservation Area along the river between just north-west of Richmond Lock and Footbridge and Richmond Railway Bridge and Viaduct, thus excluding that part of the Old Deer Park which directly abuts the towing path along the river, including the ha-ha, the small footbridge that crosses the ha-ha, the two listed 18th century obelisks, the landward arches of the grade II* listed Twickenham Bridge and the grade II listed Richmond Railway Bridge, and the area to the south-east of the listed Bridge and Viaduct extending south-eastwards to Old Palace Lane. However, by adopting this boundary for the proposed SPD, it will exclude parts of the Park which not only form much valued, integral parts of the Park but also areas which fall within the boundary of the grade I registered Royal Botanic Gardens Kew (which extends south-eastwards to Old Palace Lane) and the buffer-zone of the Royal Botanic Gardens, Kew World Heritage Site (which extends south-eastwards to the Twickenham Road (A316) and across the river to the Middlesex Bank). The Group urges that the boundary of the proposed SPD be adjusted to include these features and areas.

3.4 THE BOUNDARY OF DESIGNATED PUBLIC OPEN SPACE

The small-scale map on the second page of the Consultation Document shows only that part of the Park to the north-west of the Twickenham Road as formally designated Public Open Space, thus incorrectly excluding the entire area of much used and valued, wooded parkland to the south-east of the Twickenham Road extending south-eastwards towards the railway, south-westwards to the hah-ha and riverside, and north-eastwards to the Old Deer Park car-park, as shown in the *Local Plan Proposals Map* of July, 2015. This significant mapping error needs to be resolved at the earliest opportunity given the potentially serious implications for the sound conservation and planning of the area.

3.5 THE BOUNDARY OF THE OLD DEER PARK CAR-PARK

As will be seen from Google's current aerial photograph of the Park – as used in the Consultation Document - the red-line boundary annotated on the 'as existing' aerial photograph of the 'Car-park site and community/voluntary sector buildings' on the eighth page of the Consultation Document shows - incorrectly - the car-parking area extending south-westwards into the much used and valued wooded parkland between the Twickenham Road and the railway, some 120 metres beyond the edge of the existing Car-park. This significant mapping error needs to be resolved at the earliest opportunity given the potentially serious implications for the sound conservation and planning of the area.

3.6 Interestingly, Google's current aerial photograph of the Park was taken earlier this year when the area of much used and valued wooded parkland in question was sectored-off with barriers and being used for several days as a parking-lot for a group of large, film-unit vehicles. It is assumed that the Council had approved such a use. However, it is unclear what, if any, consultation with the local community took place before such a questionable and potentially damaging use was implemented. It will be recalled that some years ago, the then Council's proposals to extend the Old Deer Park Car-park into the much used and valued parkland area between the Twickenham Road and the railway were withdrawn after substantial challenge by the local community.

3.7 OMISSIONS

It is with considerable concern that the Group notes the complete absence from the Consultation Document of any reference whatsoever of the Crown Estate's still highly relevant *The Old Deer Park, Richmond – Landscape Strategy, 1999* prepared by Kim Wilkie Associates [it is planned to make this Strategy Report available on the Richmond Society website in the near future]. As repeatedly stated in the Group's submissions since June, 2012, this strategy is of critical importance in providing a sound assessment of the significance of the Old Deer Park historically and in landscape terms and remains an essential, material consideration in its conservation and management and in its potential development and enhancement.

3.8 Referring to the summary on the first page of the Consultation Document, the Group notes with concern the omission of any reference to the grade II listed 18th century obelisks in the Park, which are key landscape features of the Park and contribute to an understanding of the considerable significance of the King's Observatory for astronomical observation and its close associations with King George III. Similarly, the Group notes with concern the omission of any references to the grade II listed Richmond Railway Bridge and its approach viaduct and to the grade II* listed Twickenham Bridge and its landward arch – both of which are of considerable significance in shaping the character of that part of the Park nearest the river and the town.

3.9 Referring to the summary on the first page of the Consultation Document, the Group notes the reference to the 'Richmond Swimming Pool' (sic) and to the grade II listed 'building', rather than to the listed status of the entire *Pools-on-the-Park* complex. It is noted that there is a similar anomaly in the text headed 'Constraints and opportunities'

in the section addressing the Pools-on-the-Park and immediate surrounds (sic) on the fifth page of the Consultation Document.

- 3.10 The Group also notes that the small-scale map on the second page of the draft document omits the areas identified as 'Other site of nature importance' and 'Proposed area for tree-planting' clearly annotated on the *Local Plan Proposals Map* of July, 2015.
- 3.11 The Group notes the omission of reference to 'The Royal Botanic Gardens Kew World Heritage Site' in the text under the heading 'Policy and historic designations' on the second page of the Consultation Document.
- 3.12 The Group notes the omission of any reference to the listed status of the late-Victorian pavilion and the presumption for its retention in the text of the section addressing the 'Richmond Athletic Association' on the third page of the Consultation Document.
- 3.13 In the section addressing the 'Car-park site and community/voluntary sector buildings' on the eighth page of the Consultation Document, the Group would observe that not only does 'a large part of the site' comprise designated Metropolitan Open Land' but the greater part of the site. **In this connection, the Group would seriously question the potentially misleading statement in the text under the heading 'Objectives for the site' that 'part of the site ...is underutilised brownfield land'. Mindful of the definitions of 'Brownfield land' and 'Previously developed land' given in 'Annex 2: Glossary' of the *National Planning Policy Framework* of March, 2012, in Annex 6; Glossary of *The London Plan*, of March, 2015, and in the Glossary of *The Richmond-upon-Thames Development Management Plan* of November, 2011, the Group would ask the Council to clarify and confirm to which land in this part of the Old Deer Park it is referring.**

3.14 OTHER DESIGNATION ISSUES

The Group stresses that its comments on these designation issues should be read in conjunction with its comments about key aspects of the existing and proposed designations and policies relating to the Old Deer Park set out in its previous, formal submissions to the Council.

3.15 MANAGEMENT RESPONSIBILITIES

While the Park in its entirety is subject to the Council's planning policies, the Council only manages the Pools-on-the-Park and surrounding area and the Old Deer Park Car-park. It does not manage the land ascribed to the Richmond Athletic Association or to the Old Deer Park Sports Ground or to the Royal Mid-Surrey Golf Club. This distinction should be shown on the Proposals Map.

4. EXPANDED STATEMENTS ON SPECIFIC CONSULTATION QUESTIONS

4.1 RICHMOND ATHLETIC ASSOCIATION (LONDON SCOTTISH AND RICHMOND RUGBY FOOTBALL CLUBS)

Q1. Have we identified the correct constraints and opportunities? **NO**

Q2. If not, what have we missed? **See Q4**

Q3. What are your views on the ideas put forward for the relocation of the grandstand and reconfiguration of the rugby pitches?

Idea 1: Relocate grandstand adjacent to the boundary with the Royal Mid Surrey Golf Course. DISAGREE

Idea 2: Relocate grandstand adjacent to the northern boundary of the site. DISAGREE

Idea 3: Relocate grandstand on the southern boundary (across from the Pools-on-the-Park complex). AGREE

Q4 Do you have any other ideas that we should consider, or comments regarding the opportunities and challenges identified for each idea.

- 1. We welcome the ideas but they are broad brush and we do not have a strong preference based on the facts as presented. More definitive proposals for the site we believe would involve issues outlined below and possibly result in a different layout that would be required to satisfy sports needs of the site and planning and environmental constraints. For example, indoor facilities for sports, health and fitness or gymnastics or replacement of the Cannons Health & Squash Club would require careful consideration of the layout across the site.*
- 2. We have read the several reports on indoor and outdoor sports provision in the borough provided as supporting evidence to the Consultation that, inter alia, deal with demand and supply and the quality of provision. At this stage we have not dwelt on the specifics as applicable to this site and so any conclusion would be premature. But we note attention is needed in regard to the quality of the pitches and intensity of use and consideration of an APG pitch. Also, that by and large the demand/supply balance of indoor and outdoor sports provision for the borough as a whole and as distributed is broadly in balance taking account of population growth and other trends. Future plans will need to recognise the need for sports facilities and their commercial viability.*
- 3. We believe it is essential to consider plans for this site in conjunction with those in the immediate vicinity (i.e. the Pools-on-the-Park) but also with the Old Deer Park Sports Ground, so that there is an integrated approach to the provision of sports facilities. Success will be difficult if duplication of sports facilities results in excess capacity.*

4. *We regard the provision and location of car-parking as a sensitive planning issue at this site requiring examination of the demand for parking, location and access and within the context of more definitive proposals for use of the site.*
5. *The height, design and massing of any additional or replacement structures, should they be proposed, is a sensitive planning issue at this site.*
6. *We regard lighting of pitches, potential lighting spillage and times of use as a sensitive issue given the proximity to residents.*
7. *Vehicle access needs to be improved, possibly in conjunction with access to the Pools-on-the-Park, the Royal Mid-Surrey Golf Club and the King's Observatory.*
8. *Improved pedestrian access from Richmond town and the Old Deer Park Car-park we regard as an important aim both in terms of enhancing the visual appearance but also the convenience taking account of the Twickenham Road (A316) barrier; we recommend consideration be given to the crossing points, including the pedestrian bridge, and the approaches from the town. The Consultation understates the importance of this issue.*
9. *There are parts of the site that are dilapidated and in great need of improvement (e.g. the golf range). The boundary wall along Kew Foot Road needs to be repaired and responsibilities established to that end. We suggest this should be taken in hand by the Crown Estate.*
10. *Our emphasis going forward with this site and the Park as a whole is for outdoor sport and recreation rather than indoor sport requiring additional built development in such a sensitive area.*
11. *It is essential that the site not be allowed to lose any of its environmental qualities such as land designated as Metropolitan Open Land and vistas and protected views. We have expanded on this issue in the section - Wider Issues.*

4.2 POOLS-ON-THE-PARK (INDOOR AND OUTDOOR POOLS AND FITNESS FACILITIES) AND IMMEDIATE SURROUNDS:

Q5 Have we identified the right constraints and opportunities for this part of the Park?

NO

Q6 If not, what have we missed? **SEE Q8**

Q7 What are your views on the ideas put forward for the Pools-on-the-Park and surrounds?

Idea 1: Undertake internal improvements only. DISAGREE

Idea 2: Limited extensions to the Pools-on-the-Park and allow for the relocation of community/voluntary sector uses from the Old Deer Park Car-park area. AGREE

Idea 3: Comprehensive or partial redevelopment of the Pools-on-the-Park complex, together with the removal of boundary walls /fences, and allow for relocation of community/voluntary sector uses. *DISAGREE*

Q8 Do you have any other ideas that we should consider, or comments regarding the opportunities and challenges identified for each idea?

1. *We welcome the ideas but believe that Idea 1 is very unlikely to be adequate given the current state of the facilities and their fitness for purpose. Idea 3 involving redevelopment in our view is unlikely to satisfy the planning and environmental constraints, which we have expanded on in the section – Wider Issues. We strongly recommend that the Council commissions an independent assessment of the particular architectural and historic significance of the various parts of the complex and their condition and the potential scope and costs of repair and upgrading, and of future operational costs before any decisions are made regarding the Pools-on-the-Park site. Furthermore we urge the Council to consult with User groups and Stakeholders so that the best solutions can be determined before any decisions.*
2. *The current agglomeration of voluntary sector buildings (some now disused) on the Old Deer Park Car-park is untenable going forward in our view. This in no way depreciates our high regard for voluntary and charitable activities and indeed concern for the sensitivities of the issue. We believe it should be possible to provide improved facilities for the users while at the same time enhancing the qualities of the Park that the current facilities deprecate. The result could be of mutual benefit.*
3. *This section of the Consultation Document suggests as alternatives - upgraded facilities retained on the Old Deer Park Car-park and new provision re-located at the site of the Pools-on-the-Park. We believe the latter could be viable and is worth considering. We comment in paragraph 1 et seq of our answer to Q12 on the alternative of upgrading the facilities at their existing location and a further alternative involving re-provision in the Royal Mail complex and on the choice of alternative.*
4. *We are concerned the Ideas do not in our view adequately deal with the area out-with the Pools-on-the-Park site leading down to the river such as the sports pitches and the ha-ha. The area is important for recreation, outdoor sport and is regularly used for events such as circus and charity runs. Reference is made to the associated changing rooms in the Pools-on-the-Park site and the need for improvement, which we fully endorse.*
5. *We referred in paragraph 2 of our answer to Q8 to the several reports on sports in the borough. At this stage we have not dwelt on the specifics as applicable to this site and so any conclusions on demand and quality would be premature. But it would appear the borough's swimming capacity is adequate taking account of population growth and other trends. We have commented on the quality of the swimming provision and the need for enhancement. We believe the quality of sports pitches should be improved.*

6. *Any additional provision for indoor facilities for sports, health and fitness or gymnastics, for example, would require careful consideration in terms of planning and environmental constraints we have expanded on in the section – Wider Issues.*
7. *We believe it is essential to consider plans for this site in conjunction with those in the immediate vicinity (i.e. the Richmond Athletic Association) but also with the Old Deer Park Sports Ground, so that there is an integrated approach to the provision of sports facilities. Success will be difficult if duplication of sports facilities results in excess capacity.*
8. *We regard the provision and location of car-parking as a sensitive planning issue at this site requiring examination of the demand for parking, location and access and within the context of more definitive proposals for use of the site.*
9. *The height, design and massing of any additional or replacement structures, should they be proposed, is a sensitive planning issue at this site.*
10. *Vehicle access needs to be improved, possibly in conjunction with access to the Pools-on-the-Park, the Royal Mid-Surrey Golf Club and the King's Observatory from the Twickenham Road (A316).*
11. *Improved pedestrian access from Richmond town and the Old Deer Park Car-park we regard as an important aim both in terms of enhancing the visual appearance but also the convenience taking account of the Twickenham Road (A316) barrier; we recommend consideration be given to the crossing points, including the pedestrian bridge, and the approaches from the town. The Consultation understates the importance of this issue.*
12. *We welcome the provision of the existing small meadow areas. These are not only attractive to people but help maintain diversity of local species. We would like to see more such provision. This need not be to the detriment of the playing fields as there are several areas not suitable for playing fields which are available for increased meadowlands. In addition, there are technical points which need to be actioned in an improved way, such as the best times of the year for mowing the grasslands to encourage appropriate plant and flower growth.*
13. *Our emphasis going forward with this site and the Park as a whole is for outdoor sport and recreation rather than indoor sport requiring additional built development in such a sensitive area.*
14. *It is essential that the site not be allowed to lose any of its environmental qualities such as land designated as Metropolitan Open Land and vistas and protected views. We have expanded on this issue in the section - Wider Issues.*

4.3 OLD DEER PARK CAR-PARK AND COMMUNITY/ VOLUNTARY BUILDINGS

Q9 Have we identified the right constraints and opportunities for this part of the Park?
NO

Q10 If not, what have we missed? **SEE Q12**

Q11 What are your views on the ideas put forward for the Old Deer Park Car-park and community/voluntary sector buildings?

Idea 1: Re-provision of community/voluntary sector buildings rather than re-location. DISAGREE

Idea 2: Re-location of the voluntary/community sector uses and provision of education uses. DISAGREE

Q12 Do you have any other ideas that we should consider, or comments regarding the opportunities and challenges identified for each idea?

- 1. In regard to **Idea 1** we would agree in principle to re-provision of community/voluntary sector buildings if the re-provision were in the Royal Mail complex as opposed to their existing location on the Old Deer Park Car-park itself. Given the considerable townscape value and architectural and historic interest and significance of the original East Surrey Regiment Drill Hall building of 1913 (and the lesser interest and significance of the inter-War annex) which form the greater part of the existing Royal Mail Sorting Office complex, and the desirability for their retention and incorporation within any larger development, they surely hold out the opportunity for conversion to accommodate the various voluntary groups presently scattered across the various, unsightly buildings close-by – as a realistic and cost-effective alternative to developing a new building behind the Pools-on-the-Park complex. Given that the voluntary groups comprise the St John's Ambulance Brigade, the military cadets and the scouts, the use of the former Drill Hall complex would be consistent with the original, community use of the buildings. Their conversion to educational use would be equally acceptable.*
- 2. We commented on the topic of community/voluntary sector buildings in our answers on the Pools-on-the-Park site (4.2 Q8 para 2 and 3). The current agglomeration of voluntary sector buildings (some, now disused) on the Old Deer Park Car-park is untenable going forward in our view. This in no way depreciates our high regard for voluntary and charitable activities and indeed concern for the sensitivities of the issue.*
- 3. We believe it should be possible to provide improved facilities for the users of the community/voluntary sector buildings while at the same time enhancing the qualities of the Park that the current facilities deprecate. The result could be of mutual benefit.*
- 4. The Consultation Document suggests as alternatives - upgraded facilities retained on the Old Deer Park Car-park and new provision re-located at the site*

of the Pools-on-the-Park site. As explained in paragraph (1) of this Q12 we believe the choice should be between the Pools-on-the-Park site and the Royal Mail complex on the Old Deer Park Car-park site and should exclude any other part of the Car-park as an alternative. It is not possible to determine one or the other of these alternatives without further consideration of plans for the Pools-on-the-Park and the Royal Mail complex and the nature of the voluntary sector requirements. But in principle both seem viable alternatives.

- 5. We understand that the Old Deer Park Car-park is a considerable source of revenue for the Council. Notwithstanding financial constraints on use of surpluses, we would hope that a serious contribution can be made to the funding of the projects and enhancement of the Car-park suggested in the Consultation Document and funding of the Old Deer Park as a whole.*
- 6. While separated from the rest of the Park by the Twickenham Road (A316) we believe it is important to consider the Car-park as part of the Park integrated as a whole rather than as part of the town, although clearly the Car-park serves an important parking service for the town. We have expanded on this and related issues of both enhancement and conservation in the section – Wider Issues.*
- 7. Possibly in time, consideration may be given to the conversion or redevelopment of the now redundant Magistrates' Court in Parkshot for educational use, and to the conversion of the existing Royal Mail Sorting Office for similar or other community uses. We raise this here because development of these sites for whatever use adjacent to the Car-park could have implications for the Car-park itself. We have expanded on these issues in the section on Wider Issues.*
- 8. We would not be in favour of decked car-parking or development of any the Car-park's Metropolitan Open Land. We are especially concerned at the use of the term 'brownfield site' to describe part of the Car-park and we expand on this in the section – Wider Issues.*
- 9. We have referred in sections on the Pools-on-the Park and the Richmond Athletic Association sites to improving access between these two sites and the town and the Old Deer Park Car-park. The same points apply here.*

4.4 LONDON WELSH RUGBY FOOTBALL CLUB, RICHMOND CRICKET CLUB AND ASSOCIATED FACILITIES

Q13 Have we identified the right constraints and opportunities for this part of the Park?
No

Q14 If not, what have we missed? **SEE Q16**

Q15 What are your views on the idea put forward for this part of the Park, which looks to consolidate and enhance the offer provided by the existing buildings and pitches on-site? **SEE Q16**

Q16 Do you have any other ideas that we should consider or comments regarding the opportunities and challenges identified for this part of the Park?

1. *We broadly support the discussion on this site in the Consultation Document. However, we have raised some issues regarding the boundaries in the section on Wider Issues.*
2. *We referred in paragraph 2 of our answer to Q8 to the several reports on sports in the borough. At this stage we have not dwelt on the specifics as applicable to this site and so any conclusions on demand and quality would be premature. But it would appear the borough's rugby, cricket and bowls facilities are adequate taking account of population growth and other trends.*
3. *We regard lighting of pitches, potential lighting spillage and times of use as a sensitive issue given the proximity to residents.*
4. *Our emphasis going forward with this site and the Park as a whole is for outdoor sport and recreation rather than indoor sport requiring development in such a sensitive area.*
5. *Any additional provision for indoor facilities for sports, health and fitness or gymnastics, for example, would require careful consideration in terms of planning and environmental constraints we have expanded on in the section – Wider Issues.*
6. *We believe it is essential to consider plans for this site in conjunction with those in the immediate vicinity (i.e. the Richmond Athletic Association) but also with the Pools-on-the-Park site, so that there is an integrated approach to the provision of sports facilities. Success will be difficult if duplication of sports facilities results in excess capacity.*
7. *We regard the provision and location of car-parking as a sensitive planning issue at this site requiring examination of the demand for parking, location and access and within the context of more definitive proposals for use of the site.*
8. *The height, design and massing of any additional or replacement structures, should they be proposed, is a sensitive planning issue at this site.*
9. *It is essential that the site not be allowed to lose any of its environmental qualities such as land designated as Metropolitan Open Land and vistas and protected views. We have expanded on this issue in the section - Wider Issues.*

4.5 **Opportunities for environmental/accessibility improvements:**

Q17 Have we identified the right opportunities for enhancement? **YES**

Q18 If not, what have we missed?

Q19 Do you have any other ideas that we should consider or comments regarding the opportunities identified for this part of the Park?

1. *As the Old Deer Park Working Group, we have been working with the Council on developing specific projects and these are referred to broadly in the Consultation Document under this heading. But we would ask please that the more comprehensive list and scope of enhancements developed with the Council be taken into consideration in the SPD. These and other projects were for the most part identified in our 2012 report 'The Old Deer Park, Richmond - Re-connecting the Town to its local park - Realising an under-recognised parkland asset – A framework for conservation and enhancement'. This report in turn identified projects and plans in the 'The Old Deer Park, Richmond – Landscape Strategy, 1999' prepared by Kim Wilkie Associates that are to this day uncompleted and now need to be implemented.*
2. *It is most important that a comprehensive updated plan for the Old Deer Park be fully developed and based on the original Crown Estate Landscape Strategy 1999. It needs to be funded and implemented with the full support of the Council and Stakeholders so that Old Deer Park's potential for a quality park and facility for recreation and sport be fully realised.*

Q20 Do you have any other comments or ideas for the Old Deer Park? **YES.**

1. All the broad policies of the SPD should apply not just to the sites and areas detailed in the Consultation Document but also to all other parts of the Old Deer Park including the Royal Mid-Surry Golf Club.

Annex: Richmond Council's Emerging Supplementary Planning Document (the Consultation Document) for the Old Deer Park. [the Annex is included with the PDF version of this submission but not with the word.doc version]

Old Deer Park Working Group
4 November 2016

Old Deer Park

A SUPPLEMENTARY PLANNING DOCUMENT FOR OLD DEER PARK

The Old Deer Park (the Park) was established during the reign of Henry VI. It is listed as Grade I on Historic England's Register of Historic Parks and Gardens and forms the core of the Old Deer Park Conservation Area. It is bordered by the built up areas of Richmond, the River Thames and the Royal Botanic Gardens, Kew World Heritage site.

The area is extensive, being some 147 hectares in total, with a varied character ranging from open space and natural landscape supported by many mature trees, through to car parking, sports facilities and community buildings. The majority of the land is owned by the Crown Estate, which then leases different parts of the Park to a range of organisations.

The Park's main function is for recreation and includes the following, accessed from the A316:

- Recreation Ground, with open recreation areas, play, fitness and temporary events areas, sports pitches and tennis courts
- King's Observatory which is a Grade I listed building and is used as a private residence
- Royal Mid-Surrey Golf Club (members club)
- Richmond Athletic Association Ground (including Grade II listed pavilion), which is home to Richmond and London Scottish Rugby Football Clubs
- Richmond Swimming Pool (Grade II listed building) & Lido, now called 'Pools on the Park'
- Public car park, landscaped area, Royal Mail sorting office and a number of community/ voluntary sector buildings
- Accessed from the A307 (Kew Road) the Old Deer Park Sports Ground which accommodates London Welsh Amateur Rugby Football Club and Richmond Cricket Club, together with tennis, archery, bowls and squash facilities



The plan above includes the location of key features within the Park

What is a Supplementary Planning Document (SPD) and why is one needed for Old Deer Park?

SPDs are formal planning policy documents. This means that they are taken into account when the Council makes decisions on development proposals. SPDs normally have a 'life-span' of some 10-15 years.

The reason for developing a specific SPD for the Old Deer Park is that the Council recognises there will be a desire over the next few years by some organisations, with a land and property interest in the Park, to move forward with schemes to improve their facilities. There are also opportunities to improve links into and across the Park and for wider environmental improvements. The Park is an important natural, historic and community asset, so it is vital that any decisions taken are done on the basis of looking at the Park as a whole, as opposed to a series of parcels of land with different uses. This is to ensure that an integrated approach is taken to decision-making over the next 10-15 years. The SPD will provide the opportunity for the Council to be able to do this.

The boundary of the SPD is aligned to the Old Deer Park Conservation Area boundary. The SPD will help to ensure that key historic features within the area are protected whilst allowing for appropriate enhancements to amateur sports, recreation and community facilities to support the maintenance and improvement of the wider Park environment.

In preparing the SPD the Council will need to be mindful of 'higher level' planning policies and designations that apply to the Park, including that:

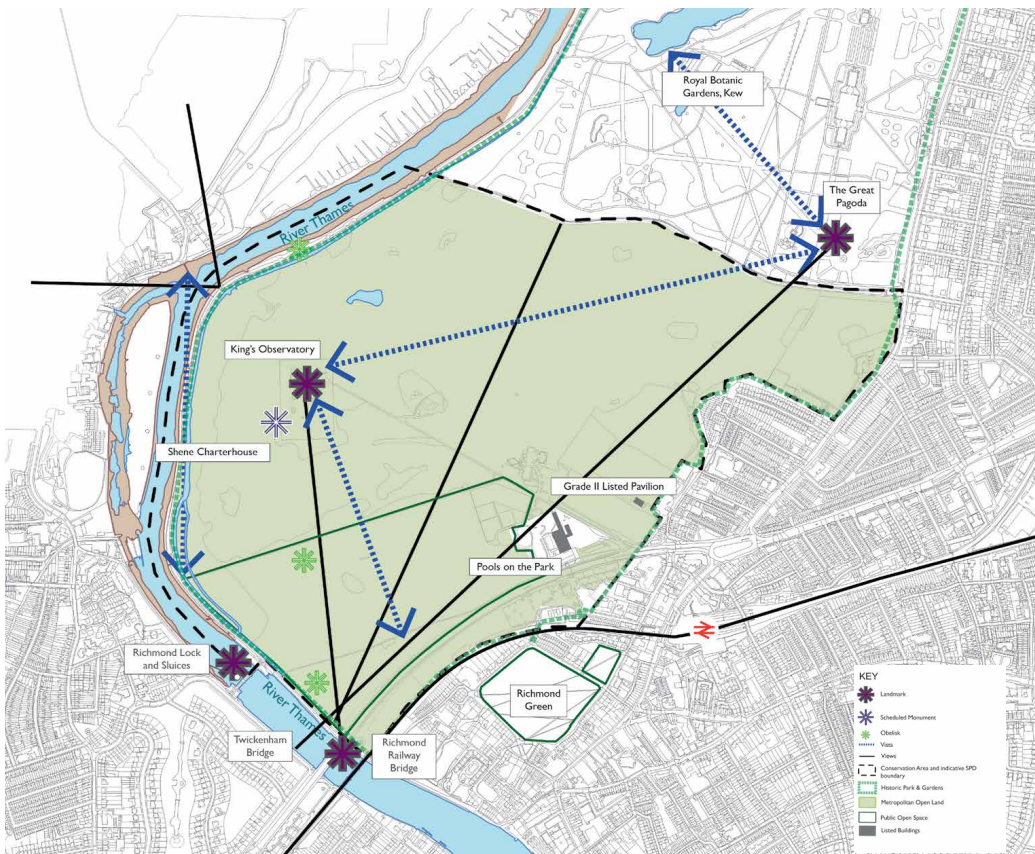
- much of it is identified as Metropolitan Open Land
- much of it falls within the 'buffer zone' of the Royal Botanic Gardens, Kew World Heritage Site
- it is a Grade I Historic Park and Garden
- it is a Conservation Area
- there are a number of Listed Buildings/Structures and Buildings of Townscape Merit within and adjacent to the Park

What are we consulting on?

The Council undertook an initial consultation in the summer of 2015 alongside the consultation on the Richmond and Richmond Hill Village Plan. Having considered the range of comments received we have developed some potential ideas which could address some of the issues and opportunities identified by both the community and in research undertaken by the Council to support the development of its Local Plan.

We recognise that there will inevitably be differing views and it is important to emphasise that these ideas are NOT Council policy. Rather they are intended to help understand what the 'opportunities' and 'challenges' may be if different approaches are taken to help you in providing more detailed comments.

The results of this further stage of consultation will then help to shape the SPD, the draft of which will also be consulted on in due course.



Policy and Historic Designations

The adjacent plan indicates the key policy and historic designations within the Park; this includes the extent of the Historic Park and Garden, Metropolitan Open Land, the Conservation Area boundary, Listed Buildings, protected views, and landmarks within and immediately outside of the proposed SPD area.

Much of the area also lies within Flood Zones, 2, 3a and 3b. For the definitive boundaries of the policy designations please see the Council's Local Plan Proposals Map (adopted July 2015) which can be viewed at www.cartogold.co.uk/richmond_2015/richmond.htm.

The Park also falls within the buffer zone to the Royal Botanical Gardens, Kew.

RICHMOND ATHLETIC ASSOCIATION - IDEAS

Initial Consultation Feedback

- Too much of the area used for car parking
- Landscaping improvements including tree planting
- The main grandstand, and the Cannons Health Club and Old Golf Driving Range buildings and surroundings are in a poor state
- The desire to see all three local rugby clubs stay and play all their home games in Richmond

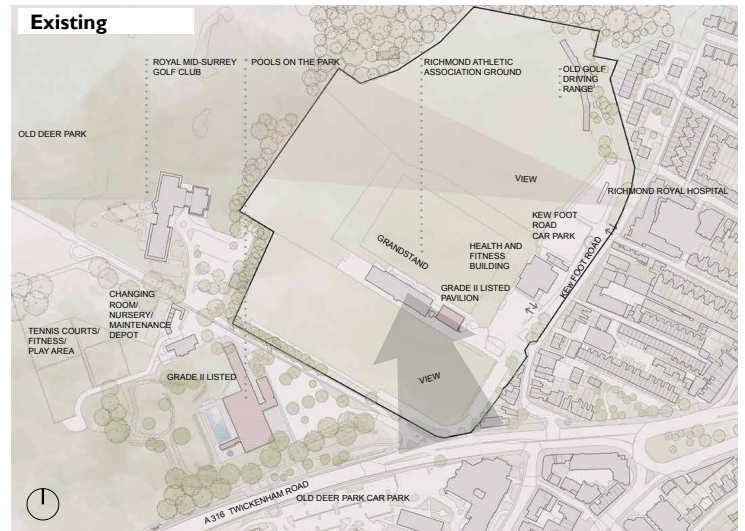
Issues and opportunities identified in the Council's Playing Pitch Strategy (August 2015) and Indoor Sports Facilities Needs Assessment (May 2015)

- Issues with both the playing and training pitch(es) being overplayed with the resultant impact on their quality
- There is currently one Artificial Grass Pitch (AGP) compliant to World Rugby IRB 22 standard in the Borough (Whitton Sports). However, funding agreements mean it is only available for 1-2 hours per week for rugby training. A further pitch is being provided at Hampton Sports and Fitness Centre
- Changing facility issues
- Opportunities to improve pitch quality should be explored as this will help to address overplay
- Need for additional floodlit training provision is needed and could also help alleviate pressure on match pitches
- Any plans should be considered within the context of the capacity of pitches
- The Cannons Health and Fitness Centre on the site contributes to the supply of facilities in the Borough
- Richmond Athletic Association has expressed a desire to improve their facilities including through the redevelopment of their existing main grandstand

More information can be viewed at www.richmond.gov.uk/home/services/planning/planning_policy/local_plan/local_development_framework_research/sport_open_space_and_recreation_needs_assessment.htm

Constraints and Opportunities identified so far

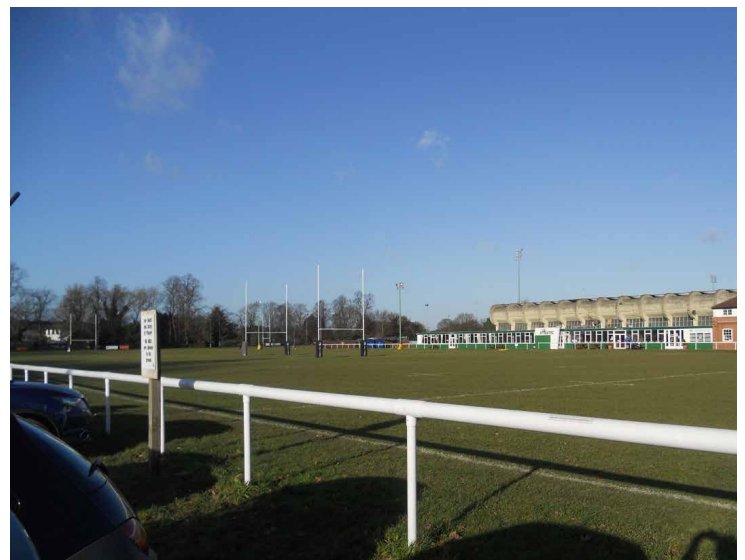
- Any new development would need to consider the local policy and historic designations context and the relationship with adjoining homes
- Any proposals should maximise the opportunities to improve the current access to the site, including by moving it away from the junction with the A316
- New facilities may require additional complementary development to support the costs of improving/replacing existing facilities. These would have to be clearly justified and be of an appropriate scale
- New and improved facilities could add to the diversity of amenities in the area and provide the opportunity for visual improvements to the appearance of the site particularly when viewed from the A316 and Kew Foot Road Conservation Area



The Existing Site

The existing athletic ground has 6 rugby playing pitches and 1 training pitch. The ideas set out on the following boards show the potential relocation of the existing main grandstand and re-configuration of the pitches which would result in the loss of one pitch. This could be a concern for Sport England and the Rugby Football Union (RFU). However, the provision of one or more AGP may be sufficient to satisfy those concerns, given AGPs can support greater use of individual pitches. This approach could widen the opportunities for local organisations and educational establishments to use the facilities, particularly during the week, through a 'Community Use' Agreement. The provision of an AGP would need to be balanced against the historic designations relating to the site.

It is important to note that the ideas do not include any potential locations for the replacement of buildings within the site other than the main grandstand (i.e. the Old Golf Driving Range, and the Cannons Health and Fitness Building). In addition, the ideas indicate potential alternative locations for the main grandstand but not the overall size, scale, massing and design of any replacement building.



Richmond Athletic Association Ground

RICHMOND ATHLETIC ASSOCIATION - IDEAS

Idea 1



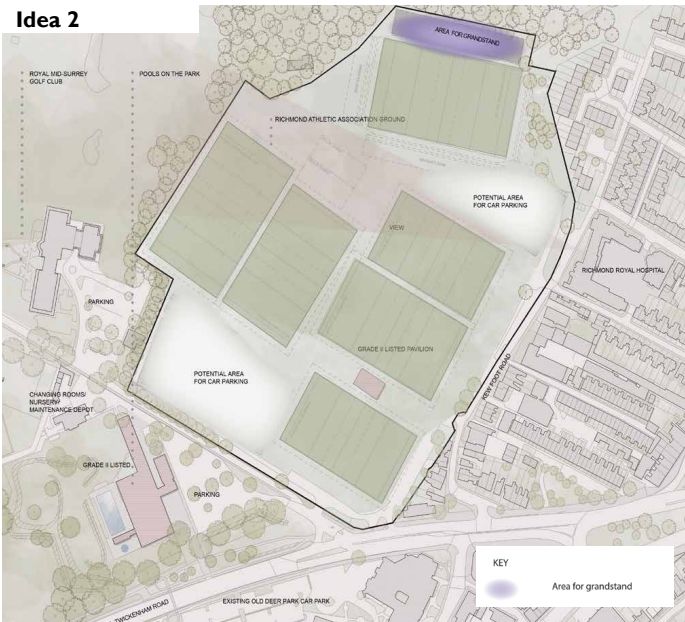
Idea 1: Opportunities

- Would allow for the main match pitch to be changed to a broadly north/south orientation, in line with RFU/Sport England recommendations
- Would move the main grandstand away from housing
- Would provide a 'tighter' grouping of buildings (when taken with the Pools on the Park and the Royal Mid-Surrey Golf Course clubhouse). This could help to improve the overall 'openness' of the site and Park
- Views to Royal Botanic Gardens, Kew from the south would be opened up
- The context of the Grade II listed pavilion would be returned to how it was when originally built
- Could provide the opportunity to relocate the existing access away from the junction with the A316

Idea 1: Challenges

- The grandstand would be in close proximity to the first Tee of the adjoining golf course
- May require the removal of the Old Golf Driving Range and the Health and Fitness building
- Could limit the opportunity to improve longer distance views across the historic landscape

Idea 2



Idea 2: Opportunities

- Would improve the views across site from the south
- Would have less visual impact when viewed from the adjacent golf course
- The context of the Grade II listed pavilion would be returned to how it was when originally built
- Could provide for the opportunity to relocate the existing access away from the junction with the A316

Idea 2: Challenges

- Would place the grandstand closer to existing housing
- The main match pitch would follow the existing orientation rather than that recommended by the RFU/ Sport England
- May require the removal of the Old Golf Driving Range and the Health and Fitness building

Idea 3



Idea 3: Opportunities

- This would improve the views across the site from the existing entrance/ A316
- Would have less impact with respect to the golf course
- It would provide a 'tighter' grouping of buildings (when taken with the Pools on the Park and the Royal Mid-Surrey Golf Course clubhouse) This could help to improve the overall 'openness' of the site and Park
- It would move the grandstand further away from existing residents
- The context of the Grade II listed pavilion would be returned to how it was when originally built

Idea 3: Challenges

- The main match pitch would follow the existing orientation rather than that recommended by the RFU/Sport England
- Potentially less opportunity to improve the existing access arrangements
- May require the removal of the Old Golf Driving Range and the Health and Fitness building
- May impact on the setting of the Pools on the Park Grade II Listed Building

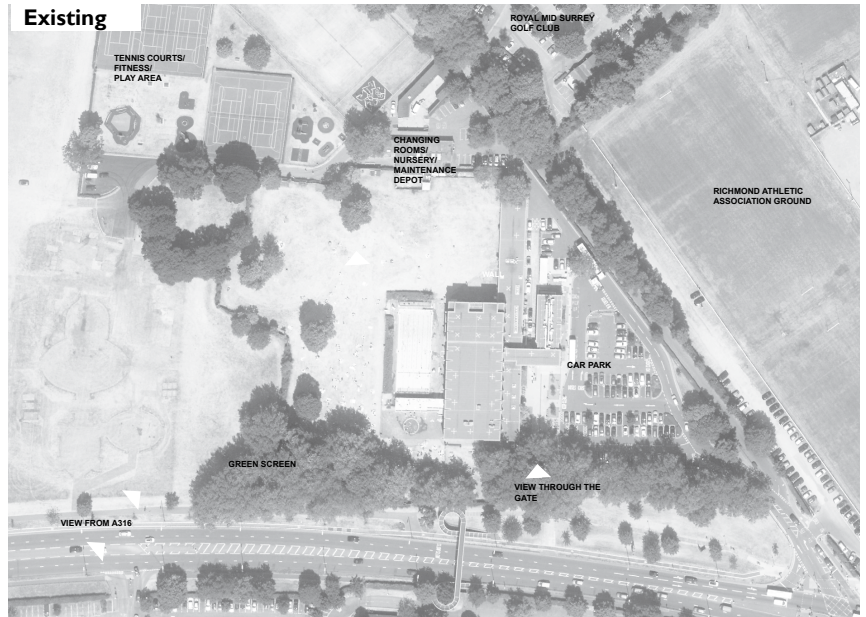
POOLS ON THE PARK AND IMMEDIATE SURROUNDS

Initial Consultation Feedback

- The pools are seen as a valued asset in the community
- The complex 'looks tired' and is seen as unattractive by some local residents
- The internal space is poorly configured and impacts on the attractiveness of the health facilities for members; the changing rooms and toddler paddling pool need upgrading
- Some residents questioned why the building had Listed status - its design was not considered suitable for its location having a harsh concrete and rigid office block appearance
- The A316 acts as an inhibitor to the use of the playground, exercise area and tennis courts
- Opportunities to improve activities for teenagers e.g. skateboard park, ice rink, trampoline park
- The tennis courts were thought to be underused

Issues and opportunities identified in the Council's Indoor Sports Facilities Needs Assessment (May 2015)

- Provides an important part of the Borough's publicly accessible swimming pool 'offer'
- Is one of the oldest swimming pools in the Borough with concerns over its ability to meet the needs of residents in the long term
- It will be expensive to maintain because of its age and without significant investment its running costs will continue to increase
- Key challenge will be to maintain a quality offer for residents
- Ideally needs replacing to offer residents a modern swimming experience
- Future population growth will place further pressure on capacity
- Gym facilities require investment to match the standards in other membership facilities
- Addition of group fitness accommodation is suggested
- The current footprint is extensive and its formal boundary creates exclusivity and prevents integration of the site with the wider area



Objectives for the site

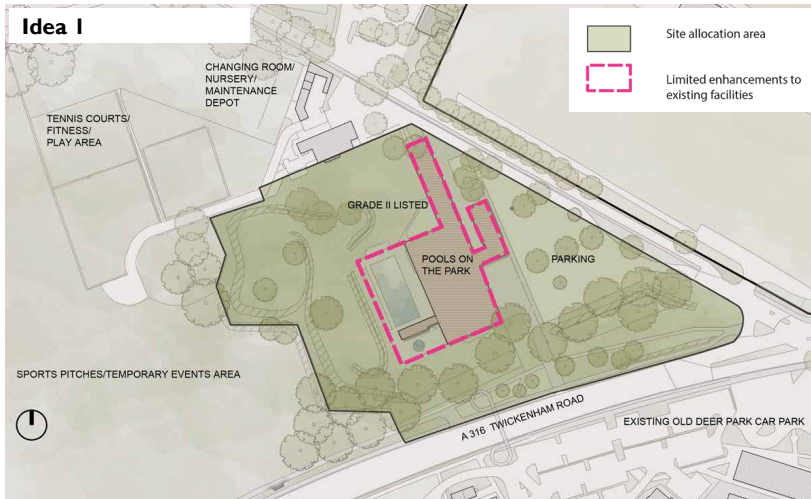
- To maintain and enhance the swimming pool and wider leisure facilities to provide a modern, quality offer for local residents which is efficient and financially viable in the longer term
- Achieve an appropriate balance between the needs of the site in the future with the policy and historic designations for the site and wider environment

Constraints and Opportunities identified so far

- Any proposals would need to consider the local policy and heritage context, including the Grade II Listed status of the building and that part of the area which lies within Metropolitan Open Land
- Any development should maximise opportunities to improve access to the site to mitigate any potential impact, in particular on the A316 Twickenham Road
- Any proposals should explore the opportunities to provide a more integrated approach between the Pools on the Park facilities and those contained within the adjoining public open space. The Council's Playing Pitch Strategy (August 2015) has indicated that the cricket, football and rugby pitches on the public open space adjacent to the site are poorly served in terms of changing facilities



POOLS ON THE PARK AND IMMEDIATE SURROUNDS



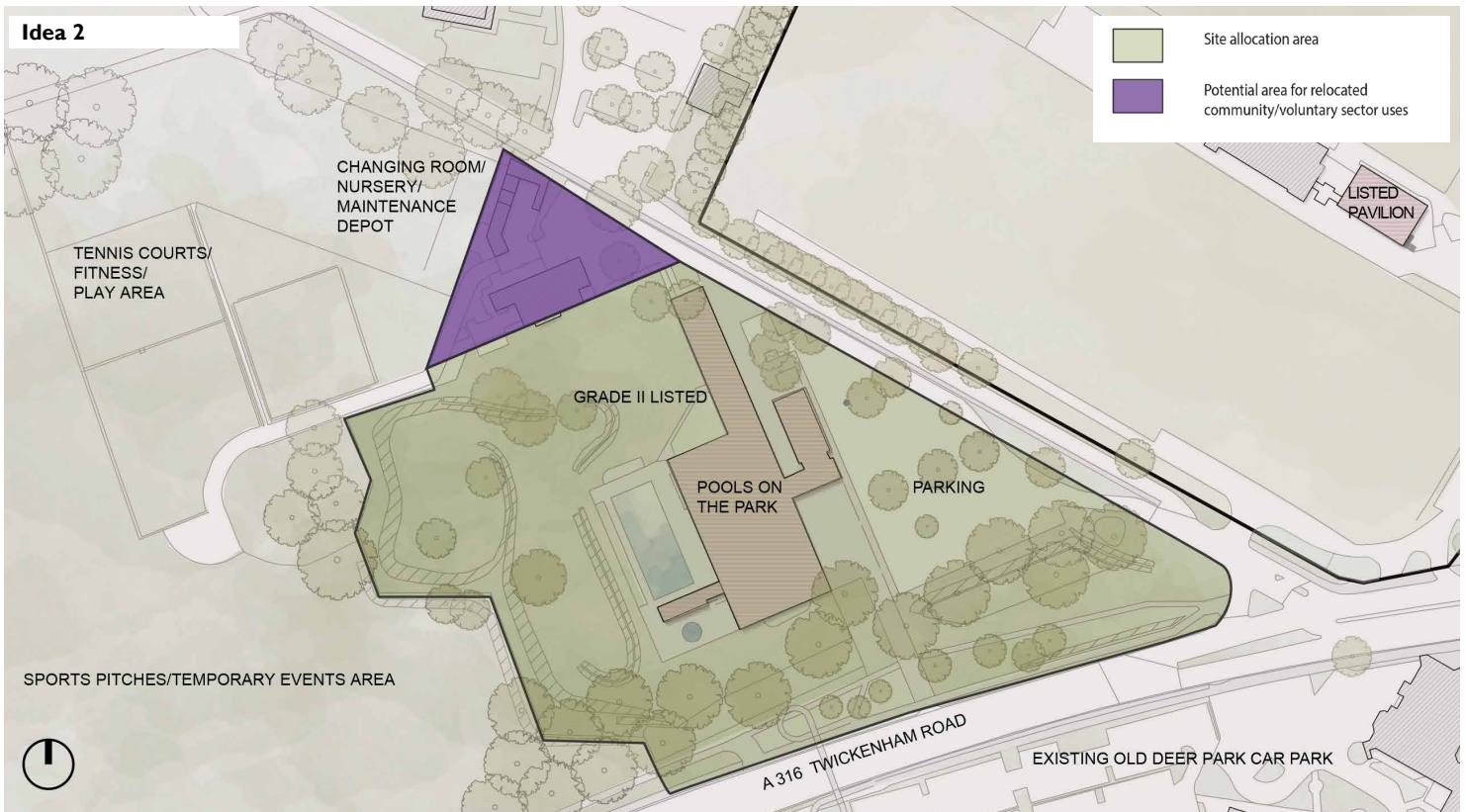
Idea 1: Undertake internal improvements only

Opportunities

- Respects the Listed status of the building
- Would provide some improvement to existing facilities
- Potentially deliverable in the short term

Challenges

- Would not provide opportunities to support significant improvements to, or expansion of, the existing facilities
- Would not address the longer-term issues for the building
- Would not facilitate the wider integration of the site with the adjoining playing fields and tennis/fitness/ play/events areas
- Would not maximise opportunities to improve the long term environmental sustainability of the building



Idea 2: Limited extensions to the Pools on the Park and allow for relocation of community/voluntary sector uses

Opportunities

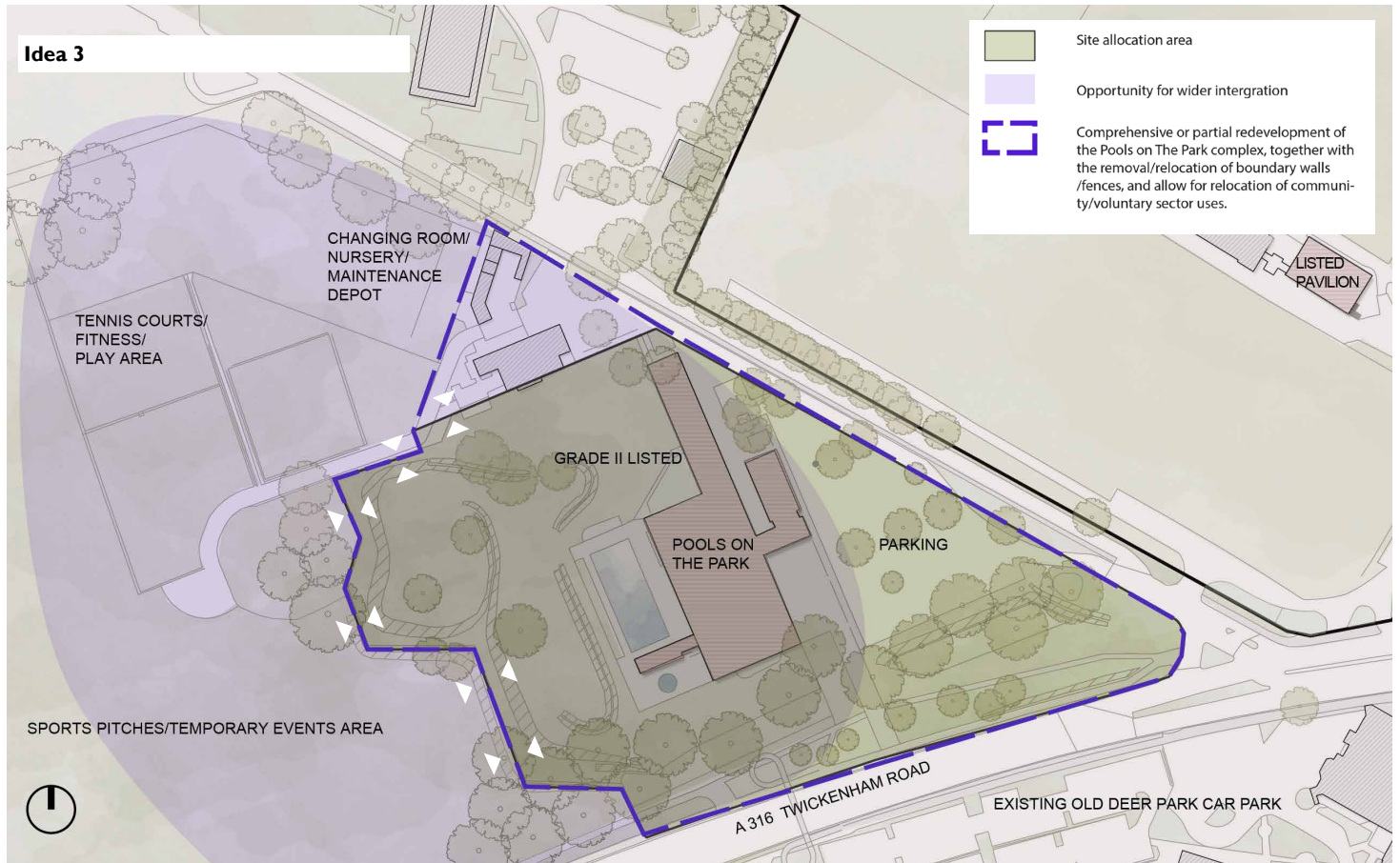
- Would provide some opportunity to review the internal layout of the Pools on the Park complex to create enhanced leisure/changing facilities
- Would create up-to-date facilities for voluntary/community uses with better access to open space
- Could provide the potential for the dual-use of some of the voluntary/community facilities to make better use of the buildings (recognising that consideration would need to be given to the individual operational needs of different groups)
- New community/voluntary sector facilities would sit within the context of existing development (when viewed alongside the Pools on the Park and Royal Mid-Surrey Golf Club clubhouse)
- Would provide access to buses that operate from the Pools on the Park

- Could be designed so as not to impact on strategic views
- Would make better use of a less accessible/visible part of the Park

Challenges

- The design of any extensions would need to be compatible with the main building to take account of its Listed status. This could limit what could be achieved and may not therefore provide 'value for money'
- Would not fully address the longer-term issues for the building as set out on the previous board
- The suggested location for community/voluntary buildings lies within Metropolitan Open Land which places constraints on any redevelopment
- Could put pressure on existing car parking
- Could result in the loss of the depot which is important to support the Parks maintenance
- The retention of the existing boundary would limit opportunities to improve integration with the wider area and improved pedestrian access

POOLS ON THE PARK AND IMMEDIATE SURROUNDS



Idea 3: Comprehensive or partial redevelopment of the Pools on The Park complex, together with the removal/relocation of boundary walls /fences, and allow for relocation of community/voluntary sector uses

Opportunities

- Comprehensive redevelopment would address the identified issues for the Pools on the Park by creating flexibility to re-provide and enhance the swimming pools and associated changing and leisure facilities in a coherent, efficient and environmentally sustainable form
- Partial re-development through retention of the main pool area whilst demolishing and re-providing other parts of the building in a different form would retain the core part of the Listed Building whilst providing the opportunity to re-provide the associated changing and leisure facilities in a coherent, efficient and environmentally sustainable form
- The removal/relocation of the existing boundary walls/fences would take away barriers which currently prevent better integration of the facilities with the wider recreation/sporting/events areas. This would provide opportunities to make better use of a less accessible/visible part of the Park particularly if supported by improved pedestrian links
- Would create up-to-date facilities for voluntary/community uses with better access to open space
- Could provide the potential for the dual-use of some of the voluntary/community facilities to make better use of the buildings (recognising that consideration would need to be given to the individual operational needs of different groups)
- Would create a sporting and community 'hub' providing an integrated approach to sport and physical activity, with an extensive 'offer' which could provide the opportunity to attract significant external funding
- New community/voluntary sector facilities would sit within the context of existing development (when viewed alongside the Pools on the Park and Royal Mid-Surrey Golf Club clubhouse)

- Could be designed so as not to impact on strategic views
- Would provide access to buses that operate from the Pools on the Park
- Could allow for a review of car parking, provision of the maintenance depot and improved sports pitch changing facilities

Challenges

- Comprehensive or partial redevelopment of the Pools on the Park complex would result in the loss of all or part of a Grade II listed building. Any demolition would need to be clearly justified, including through an assessment of the historic/architectural significance of all or part of the listed building and would require agreement by Historic England
- Any partial re-development of the Pools on the Park complex would result in the loss of parts of a Grade II Listed Building and would need to be designed to ensure compatibility with the main Pools part of the complex
- A need to ensure that the main operational areas of the Pools complex remain secure and safe if changing the current boundary walling/fencing
- The suggested location of community/voluntary sector facilities lies within Metropolitan Open Land, which places constraints on any redevelopment
- Would require significant investment and co-operation from a range of stakeholders and so is unlikely to be deliverable in the short-term

CAR PARK SITE AND COMMUNITY /VOLUNTARY SECTOR BUILDINGS

Initial Consultation Feedback

- The site at present is seen as unattractive by local residents
- A number of the buildings are considered to be unsightly – the site would benefit from their demolition and provision of improved accommodation within the locality and re-instate the open parkland character of that part of the Park closest to the town after relocation
- Suggestions that voluntary organisations located on the site could be relocated into a shared facility
- The site would be a good location for a school
- Parts of the site are difficult to orientate and do not provide an attractive and easy to navigate link between central Richmond (including Richmond Green) and the main part of Old Deer Park
- There could be better links created between the car park and the River
- The landscaped area between the car park and the River was seen by some as being underutilised

Objectives for the site

- To regenerate and maximise the opportunities for that part of the site that is underutilised brownfield land in order to support the wider needs of Borough residents
- To improve accessibility and legibility between the surrounding areas of central Richmond and the main part of the Park
- To create a more attractive landscape/ visual offer
- To continue to provide for car parking recognising that this is an important resource close to central Richmond

Constraints and Opportunities identified so far

- The site lies within the Old Deer Park Conservation Area, the Historic Park and Garden, has potential archaeological interest and a large part of the site is designated as Metropolitan Open Land
- The A316 Twickenham Road creates physical separation within the Old Deer Park Conservation Area which impacts on the integrity of the designation and isolates this part of the Park from the remainder
- The site is located within a short walking distance of both Richmond Railway station and bus services serving the wider Borough
- Lies adjacent to Richmond Adult Community College, which offers a wide range of educational facilities, and to the sports and leisure facilities within the main Park which could be used to support, for example, education uses on the site
- The site contains some historic boundary walls and entrances



CAR PARK SITE AND COMMUNITY /VOLUNTARY SECTOR BUILDINGS



Idea 1: Re-provision of community / voluntary sector uses

Opportunities

- Would provide improved facilities for voluntary and community organisations
- Could provide the potential for dual use of the facilities (although consideration would need to be given to the requirements of different groups)
- Could provide the opportunity to consolidate the existing built form on the site
- Would provide opportunities for environmental enhancements
- Could provide the opportunity to re-configure and improve the visual appearance of the existing car parking, including potentially through some decked provision, subject to avoiding impacts on existing trees and being of an appropriate design form

appearance of the existing car parking, including potentially through some decked provision, subject to avoiding impacts on existing trees and being of an appropriate design form

- Would allow for improved/ more legible links between central Richmond, Richmond Green, the River and the Park for the benefit of pedestrians and cyclists

Challenges

- Would not provide opportunities for greater access to open space/ recreation facilities that relocation would provide
- Would reduce the flexibility to provide for other uses on the wider site (such as education) or to re-configure the car parking areas



Idea 2: Re-location of the voluntary/community facilities and provision of education uses

Opportunities

- Could provide the opportunity to create an education 'hub' (taking into account the location of Richmond Adult Community College) within easy reach of good public transport links
- Would benefit from opportunities to make use of sporting/recreation facilities on the main part of the Park and facilities offered by Richmond Adult Community College thus making best use of the site and its location
- Could provide the opportunity to consolidate the existing built form on the site
- Could provide the opportunity to re-configure and improve the visual appearance of the existing car parking, including potentially through some decked provision, subject to avoiding impacts on existing trees and being of an appropriate design form'

- Could provide the opportunity to re-provide some of the existing car parking, potentially in decked form, subject to avoiding impacts on existing trees
- Would allow for links between central Richmond, Richmond Green, the River and the Park to be improved for the benefit of pedestrians and cyclists

Challenges

- Would require careful consideration of the scale and location of any new buildings to take account of the area's historic and policy designations
- Would require the re-location of the existing voluntary/community sector buildings. However, there are opportunities for re-provision adjacent to the Pools on the Park (see the Boards relating to the 'Pools on the Park and immediate surroundings)
- Development may intrude into an area of Metropolitan Open Land (although it would be replacing some existing buildings)
- Would require considerable financial investment predominantly from the Education Funding Agency and would therefore be a longer term aspiration

OLD DEER PARK SPORTS GROUND – London Welsh Rugby Football Club, Richmond Cricket Club, Archery, Tennis, Bowls And Squash

Initial feedback after consultation

- The desire to see all three local rugby clubs stay and play all their home games in Richmond
- Need for improved facilities including provision of an all-weather pitch and improvements to the appearance of the existing buildings
- Need for landscape improvements
- Need for improved car parking
- Need to encourage greater use of the site
- Suggestions of providing a new grandstand and London Welsh, London Scottish, and Richmond Rugby Football Clubs groundsharing

Issues and opportunities identified in the Council's Playing Pitch Strategy (August 2015)

- Issues with the playing pitches being overlapped with the resultant impact on their quality
- There is currently one AGP compliant to World Rugby IRB 22 standard in the borough (Whitton Sports). However, funding agreements mean it is only available for 1-2 hours per week for rugby training. An additional AGP is being provided at Hampton Sports and Fitness Centre
- Opportunities to improve pitch quality should be explored as this will help to address overlap
- Need for additional floodlit training provision is needed and could also help alleviate pressure on match pitches (although this does not necessarily need to be provided on-site)

Objectives for the site

- To maximise the sporting/recreation offer available to local residents and strengthening the presence of local sports clubs in the Borough
- To balance the needs of the existing clubs and the long-term viability of the site with the historic and policy designations that apply, including recognising the close proximity of the site to the boundary with the Royal Botanic Gardens, Kew World Heritage site

Constraints and Opportunities identified so far

- Opportunities to improve the existing club facilities on site including in terms of changing room and medical facilities by reconfiguring the existing accommodation
- Opportunities to improve the quality of pitches
- Any development would need to consider the local policy and heritage designations context
- The site is bordered in various places by a historic 'ha-ha', gateway and boundary walls
- The site lies immediately adjacent to the Royal Botanic Gardens, Kew with views to the Great Pagoda



Idea: Consolidate and enhance the offer provided by the existing buildings and pitches on-site

The extent of the playing pitches on the site and costs limits the scope for re-location and/or re-provision of, for example, the existing grandstand and clubhouse. There are, however, potential opportunities to make better use of the existing facilities. This could involve internal alterations to the main clubhouse together with limited 'infill' extensions and provision of facilities below the existing grandstand. In addition the provision of an Artificial Grass Pitch (AGP) could partly address the issues of playing pitch quality and increase usage.

Opportunities

- Would provide for enhancements to the quality and quantity of changing room, medical and other facilities and improve the external appearance of the clubhouse
- Would be unlikely to impact on the historic and Metropolitan Open Land designations or the relationship with the Royal Botanic Gardens, Kew World Heritage site
- Could provide the opportunity to remove some existing aging and unattractive buildings/structures within close proximity to the main clubhouse and allow for improvements to the car parking arrangements
- The provision of an AGP would address issues of pitch quality and maximise opportunities to widen the level and regularity of use

Challenges

- Could involve the loss of a residential unit which is ancillary to the use of the club. However, it is understood that there is no identified need for its retention and it would not be appropriate for occupation by somebody not employed by the site
- The provision of an AGP would need to be balanced against the historic designations relating to the site

OPPORTUNITIES FOR ENVIRONMENTAL/ ACCESSIBILITY IMPROVEMENTS

Initial Consultation Feedback

- As part of the improvement of individual facilities within Old Deer Park, there is an opportunity to improve the landscape/ environmental conditions as well as accessibility and movement for local residents
- The initial Consultation highlighted that accessibility and movement around and into Old Deer Park could be improved. Key issues include the inadequacy of some pedestrian and cycle routes around the Park and crossing into the Park from surrounding areas, particularly across Twickenham Road and the River Thames at Richmond Lock
- Concerns were raised about the lack of public access to the Royal Mid-Surrey Golf Club and to the King's Observatory
- Suggestions that landscaping around the various facilities could be improved and that additional landscaping, including wild meadow planting, could improve the look and feel of the Park and the surrounding area

The Old Deer Park Working Group (which is a joint initiative of the Richmond Society, The Kew Society, The Friends of Richmond Green, The Friends of Old Deer Park and the St Margaret's Estate Residents Association) has highlighted a number of key issues that should be addressed as part of the improvement of the Park, notably these include:

- Issues with the poor condition and deterioration of the visual appearance of the Richmond Athletics Association ground
- Pedestrian entry-points into the Park should be more clearly defined and celebrated. There is considerable scope to improve the waymarking of safe and attractive pedestrian links between these entry-points, to and from the sports facilities at the heart of the Park, together with the provision of interpretation boards
- Emphasis needed to reduce the visual impact of the enlarged surfaced areas devoted to car-parking within the Richmond Athletic Association's ground and of the significant number of unattractive ancillary buildings, structures and fences within the ground and on improving the entrances to the ground from the A316 Twickenham Road and Kew Foot Road
- The need to reduce the visual impact of the Old Deer Park car park

Opportunities for enhancement have been identified:

Signage

- There is scope to improve signage in the Park; including clearer direction to key facilities as well as celebrating the history of the park and its key features through interpretation boards

Gateways

- Improve the access and visibility of the Park through the creation of new gateways including from the riverside
- Improving the presentation of existing gateways such as the A316 footbridge, which at present is unattractive and in an inconvenient location
- Improve the functional and visual relationship with the A316 Twickenham Road

Trees

- Open up views to the King's Observatory and other features (such as the obelisks) and longer distance vistas/views by the removal/pruning of trees/vegetation predominantly within the boundary of the Royal Mid-Surrey Golf Club

Access

- Improving pedestrian links into and across the Park



Golf clubhouse



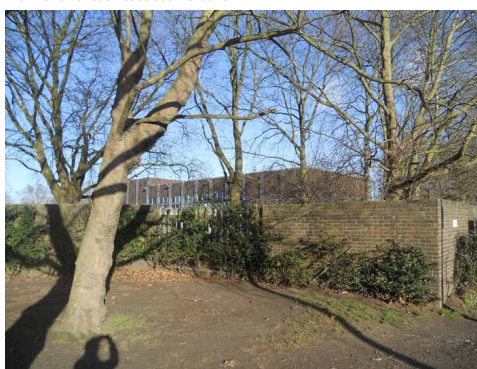
Recreation area



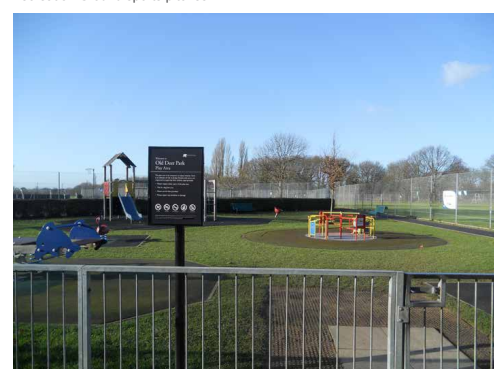
Richmond Athletic Association Ground



Recreation Ground sports pitches



Pools on the Park



Play area

THE OLD DEER PARK, RICHMOND

Re-connecting the Town to its local park - Realising an under-recognised parkland asset

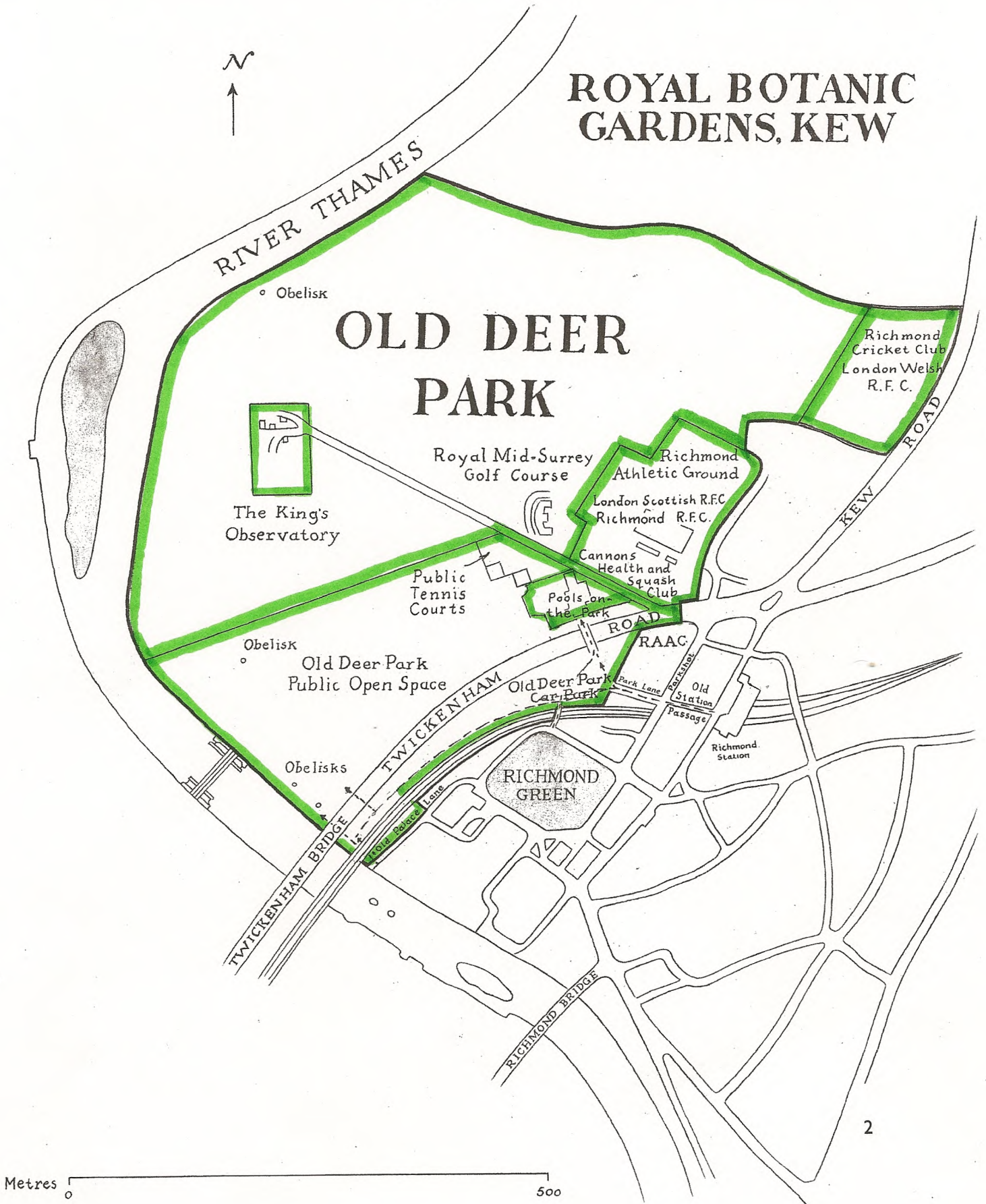
A FRAMEWORK FOR FUTURE CONSERVATION AND ENHANCEMENT



JUNE, 2012

**THE RICHMOND SOCIETY – THE KEW SOCIETY
THE FRIENDS OF RICHMOND GREEN – THE FRIENDS OF OLD DEER PARK
THE ST. MARGARETS ESTATE RESIDENTS ASSOCIATION**

MAP I - THE OLD DEER PARK, RICHMOND, AND ITS CONSTITUENT PARTS



THE OLD DEER PARK, RICHMOND

Re-connecting the Town to its local park - Realising an under-recognised parkland asset

A FRAMEWORK FOR CONSERVATION AND ENHANCEMENT

I. INTRODUCTION

- 1.1 In April, 2016, all but one of the existing leases granted by the Crown Estate for the land comprising the Old Deer Park are due to expire. In relation to the renewal of these leases and what we understand to be negotiations between the relevant parties currently taking place, a number of groups in the local community has come together to consider how best to encourage the effective conservation and improvement of the park by the Crown Estate and its lessees in the context of these discussions and in future years.
- 1.2 The origins and development of the Old Deer Park and its significant Royal and other historical associations extend across six centuries. In 1883, the overall area of the Old Deer Park, Richmond was stated as comprising some 350 acres. Today, the overall area of open parkland has been reduced to some 334 acres as a result of urban encroachments, particularly along its south-eastern edge and by the construction of the Twickenham Road and Twickenham Bridge and its embanked approach between 1930 and 1933 and the creation and extension of the Old Deer Park Car-park in the 1960s and in subsequent years. To the north, the Park is bounded by The Royal Botanic Gardens, Kew; to the east by the Kew Road and Kew Foot Road; to the south by the railway cutting and viaduct and Old Palace Lane; and to the west by the curve of one of the most beautiful stretches of the Thames near London (see Map 1 attached). The entire Park falls within the freehold ownership of the Crown Estate. Despite the changes of the last one hundred or more years, the Park is formally recognised by UNESCO as a 'buffer-zone' to *The Royal Botanic Gardens, Kew World Heritage Site*; included with Kew Gardens at grade I on English Heritage's *Register of Parks and Gardens of Special Historic Interest*; and rightly designated as a conservation area in its own right, (the boundaries of these designations are identified in Maps 2, 3 and 4 included in Appendix 3).
- 1.3 This report has been prepared by a Working Group comprising The Richmond Society, The Kew Society, The Friends of Richmond Green, The Friends of Old Deer Park and The St. Margarets Estate Residents Association, and is intended to provide a positive contribution to discussion and debate in the context of the falling-in and renewal of all but one of the existing leases granted by the Crown Estate for the land comprising the Old Deer Park, Richmond. Details about each of the local groups and their objectives are set out in a Appendix I at the end of this report.
- 1.4 Over many years, many living and working in Richmond, Kew and St. Margarets have expressed substantial interest in the effective conservation and enhancement of the Park and have attached considerable value to its amenity, and its particular character and historic, landscape and ecological interest and significance. Accordingly, the Working Group believes that it is timely to set out the corporate views of the constituent bodies on the opportunities that arise and its keen hope that the Crown Estate will progress

the future management of its Old Deer Park estate with a view to assuring its effective conservation and enhancement in addition to its continued use for outdoor sports and recreational activity by the local community. The group is concerned that any development that might be advanced within the area should not only be sustainable in the fullest sense but also consistent with the designation of the Park as a conservation area and its inclusion on English Heritage's *Register of Parks and Gardens of Special Historic Interest* and in the buffer-zone of the *Royal Botanic Gardens, Kew World Heritage Site*.

- 1.5 Importantly, the Working Group believes that high priority should be given to improving and enhancing physical links between the Town and the Park and is suggesting a number of measures that might be delivered relatively easily and inexpensively.

2. THE PLANNING CONTEXT

- 2.1 The Working Group notes that the Old Deer Park is covered by a number of important heritage and other designations under national, metropolitan and local planning regimes (under the former *Richmond upon Thames Unitary Development Plan* and the current *Richmond upon Thames Local Development Framework*). The boundaries of these designations are identified in the maps included in Appendix 3.
- 2.2 The greater part of the Park is included within the buffer-zone for *The Royal Botanic Gardens, Kew World Heritage Site*, formally inscribed in 2003 (see Map 2). The Park in its entirety, including the Old Deer Park Car-park and the Royal Mail Delivery Office, is included with Kew Gardens at grade I in English Heritage's *Register of Parks and Gardens of Special Historic Interest* (See Map 3). The Park is rightly included within the boundary of *The Old Deer Park Conservation Area*, first designated in June, 1990 and modestly extended at its south-eastern corner in November, 2005 (See Map 4). Within the Park, William Chambers' King's Observatory of 1788-1789 is included on the *Secretary of State's Statutory List of Buildings of Special Architectural or Historic Interest* at grade I, the Surrey end of Twickenham Bridge of 1931-1933 is included on the *List* at grade II*, *The Pools on the Park* swimming pools complex constructed in 1964-1966 is included on the *List* at grade II together with the late-Victorian sports pavilion/grandstand in the land leased by the Richmond Athletic Association, and Edward Anderson's three stone obelisks, first put in place in 1778. Anomalously, the surviving below-ground remains of *The Charterhouse of Jesus of Bethlehem at Shene*, the largest Carthusian monastic house in pre-Reformation England, located close to the King's Observatory, remain without formal designation as a scheduled ancient monument at the present time.
- 2.3 The group notes that a detailed description, assessment and management proposals for the *Old Deer Park Conservation Area* are contained in a supplementary planning guidance document first published and adopted by the Council in 1990.
- 2.4 Most importantly, the Working Group notes that the Old Deer Park is embraced within the areas adjacent to the river covered by *The Thames Landscape Strategy: Hampton to Kew* – specifically Landscape Character Reach No. 10 – Isleworth.
- 2.5 The greater part of the Park, including the Old Deer Car-park and the British Legion and buildings immediately adjacent, has long been rightly designated as *Metropolitan Open Land* (See Map 5). However, anomalously, the designation excludes the listed *Pools on*

the Park swimming pools complex and its landscaped grounds and the carriageway and footways of The Twickenham Road, despite the inclusion of these areas and features within a grade I Registered Park and the buffer-zone a World Heritage Site, and despite repeated representations by groups in the local community. The MOL designation also excludes the land to the immediate south of the car-park on which the single-storey buildings occupied by voluntary groups stand. The greater part of the Park is designated as part the Thames Special Policy Area under the London Plan, 2011 (Map 7.6 – Hampton to Wandsworth) and its boundaries defined in detail on the Local Development Framework Proposals Map, Adopted November, 2011, supporting the Council's Core Strategy, Adopted 2009 and Development Management Plan, Adopted November, 2011. The Royal Mid-Surrey Golf Club course, together with limited parts of the public park at its western extremity adjacent to the river and between the Twickenham Road and the railway cutting and viaduct are designated as Other sites of nature importance, and the publicly accessible part of the Park – the original 'eighty-seven acres' - is designated as Public Open Space (See Map 5). However, anomalously, the designation excludes the Old Deer Park Car-park. The group notes that significant parts of the public park are identified in the adopted Proposals Map as Proposed areas for tree planting.

2.6 The Working Group notes that wholly anomalously, the entire area of the Old Deer Park Car-park is identified by the Council in the adopted Proposals Map as forming part of the designated Richmond Town Centre despite its clearly forming an integral part of the Old Deer Park, despite the inclusion of the area within the grade I Royal Botanic Gardens, Kew Registered Park, and despite repeated representations over past years by groups in the local community questioning its designation as part of an Area of mixed use (See Map 6). That part of the car-park within the freehold ownership of the Council is specifically identified in the Council's Sales/Reinvestment Programme under reference 0538.

2.7 The Pools on the Park complex and its landscaped grounds are covered under the present Local Development Framework under retained project R.8 of the Unitary Development Plan, First Review, Adopted March, 2005, for potential intensification of sports use:

'Increased indoor recreation facilities including expansion of health and fitness suite will increase provision for which there is a need. The pools complex is listed Grade II in the List of Buildings of Special Architectural or historic Interest; its inter-relationship of indoor and outdoor space and its relationship to its parkland setting contribute to its status as an exemplar 1960s swimming baths design. Any proposed improvements must therefore respect the character of the building and its setting in the Old Deer Park (which is included in English Heritage's Register of Parks and Gardens at grade I), the character of the conservation area, and the location adjacent to Metropolitan Open Land, and must not encroach upon the Old Deer Park area physically and should respect conservation area and historic park status and its location adjacent to Metropolitan Open Land. Car parking should be extensively landscaped to reflect this location. Access by alternative means to the car will be encouraged.'

2.8 The group notes that two 'additional' protected views relating to the Old Deer Park have been specifically identified under paragraph 2.5 and the proposals map supporting the Council's Development Management Plan, Adopted November, 2011, described as follows:

'N_View_001 – New view from St. Margarets Promenade to Kew Pagoda – A historical view to a grade I listed structure across River Thames and the Old Deer Park', and

'N_View_002 – New view from towpath to King's Observatory, Old Deer Park – View recently opened up and marker installed'.

- 2.9 The Working Group recognises that the following policies of the *London Plan, 2011* and the Council's *Development Management Plan, Adopted November, 2011* will be of particular relevance in progressing the conservation of the Old Deer Park and any development proposals within or adjacent to it:

Policy 7.8 (Heritage assets and archaeology), Policy 7.10 (World Heritage Sites), 7.17 (Metropolitan Open Land), 7.18 (Protecting local open space and addressing local deficiency), 7.19 (Biodiversity and access to nature), 7.21 (Trees and woodland) and 7.29 (The River Thames).

Policy DM OS 2 (Metropolitan Open Land), DM OS 4 (Historic Parks, Gardens and Landscape), DM OS 5 (Biodiversity and new development), DM OS 6 (Public Open Space), DM OS 7 (Children's and young people's play facilities), DM OS 8 (Sport and recreation facilities), DM OS 9 (Flood-lighting), DM HD 1 (Conservation Areas – Designation, protection and enhancement), DM HD 4 (Archaeological sites), DM HD 5 (World Heritage Site), DM HD 7 (Views and vistas) and DM DC 4 (Trees and landscape).

3. THE CROWN ESTATE'S LANDSCAPE STRATEGY

- 3.1 The Working Group commends the Crown Estate on its commissioning and adopting a landscape strategy for the Old Deer Park in September, 1999 – *The Old Deer Park Richmond – Landscape Strategy* (by Kim Wilkie Associates) and believes that this excellent document continues to provide a sound and relevant base for the future management, conservation, development and enhancement of the Park in parallel with the relevant protective provisions of the *London Plan* and Richmond upon Thames Council's *Development Management Plan, Adopted November, 2011*. The group believes that the Crown Estate's *Landscape Strategy* is further usefully underpinned by Richmond upon Thames Council's formally adopted *Old Deer Park Study*, published in 1990, and *The Thames Landscape Strategy*. The group considers that the continued implementation of the policies and the realisation or completion of the projects identified in these documents remain most desirable.
- 3.2 The Working Group's comments on specific aspects of the Crown Estate's *Landscape Strategy* are set out in Appendix 2.

4 THE SPECIFIC CONCERNS OF THE WORKING GROUP

- 4.1 The Working Group believes that since the publication of the Crown Estate's *Landscape Strategy* in September, 1999, the poor condition of the physical environment in the area around the entrance to the Old Deer Park and Car-park from Park Lane, close to the *Royal Mail Delivery Office* and the buildings occupied by *The Royal British Legion* and *North*

- Richmond Scout Group*, and in that part of the Park leased by *Richmond Athletic Association* adjacent to the Kew Foot Road has deteriorated further and significantly. In addition and importantly, the condition of the Council-owned and long-closed public conveniences building adjacent to the Old Deer Park Car-park is in a seriously deteriorating condition, with little if any evidence of any remedial work by the Council. Some of the single-storey buildings used by voluntary groups located between the Old Deer Park Car-park and the railway land and cutting also appear to be unused or little used and in a deteriorating condition.
- 4.2 Similarly, the unused or little used, Council-owned ancillary building located on land designated as MOL to the immediate north-west of the landscaped grounds of *The Pools on the Park* complex (and outside the boundary of Project R 8) together with the adjacent sports changing-rooms and club-room building, designed and built as an integral part of the original swimming pool complex) appear to be in a seriously deteriorating condition. The listed *Pools on the Park* swimming pools complex suffers from poorly designed and insensitively located banner-signs and other features that seriously detract from the external appearance and architectural integrity of the award-winning building. In addition, the replacement of the original, carefully detailed, patinated copper-sheet cladding of the upper parts of the main building (deliberately designed to assist in the integration of the building into its landscaped setting) with a poorly detailed and aesthetically inferior material has had an adverse impact on the integrity of Leslie Gooday's award-winning design. In addition, the condition of the landscaped area serving the listed *Pools on the Park* swimming pools complex has diminished from the once impeccable state it enjoyed in its early years.
- 4.3 Most depressingly, within the north-eastern part of the *Richmond Athletic Association's* ground, once the home with other clubs of *Richmond Town Cricket Club* and *Richmond Town Bowling Club*, the once immaculately tended bowling-green and attractive club-house fell into a derelict state after the falling-in of the club's lease and the departure of the club; a situation only relieved in modest part by the use of the former green in the last year as an additional play-space by the nearby Falcon's Preparatory School. Further to the north-east, the nearby golf-driving range remains fenced-off and disused, whilst to the south-west, the surfaced areas devoted to car-parking for *London Scottish Rugby Football Club*, *Richmond Rugby Football Club* and *Cannons Health and Squash Club* and to what is understood to be contract car-parking have been increased substantially in recent years.
- 4.4 By contrast, the condition of that part of the Old Deer Park immediately to the south of the Royal Botanic Gardens occupied by *Richmond Cricket Club*, *London Welsh Rugby Football Club*, *Mid-Surrey Bowling Club*, *Richmond Tennis Club* and *Richmond Archery Club* has been considerably enhanced since 1999. *The Royal Mid-Surrey Golf Club's* club-house has been rebuilt and enlarged in recent years to an improved design further to a major fire which destroyed the earlier club-house opened in 1937, and its immediate setting, including the car-parking area improved. In recent years the seven grass and five hard tennis-courts located in the adjacent part of the public park, to the north-west of *The Pools on the Park* leisure complex have been improved by the Council. In addition, the landscaped area around The King's Observatory is being improved as part of a major project for the refurbishment of the building and its setting.

- 4.5 Finally and importantly, the Working Group is concerned that Council should give urgent consideration to reviewing and adjusting limited sections of the boundaries of *Metropolitan Open Land, Public Open Space and the Richmond Town Centre* in the area of the Old Deer Park as presently drawn in the Council's *Local Development Framework Proposals Map, Adopted November, 2011*, as repeatedly urged by groups in the local community over past years, in order to remedy the serious zoning anomalies referred to in paragraphs 2.5 and 2.6 above.

5. THE WORKING GROUP'S UNDERSTANDING OF THE POSITION REGARDING THE EXPIRY OF LEASES

- 5.1 The Working Group believes that the expiry and renewal of the leases of key parts of the Old Deer Park in the near future provide the opportunity for advancing more successfully than in the last twelve years the realisation of the policies, projects and landscape management recommendations set out in the *Landscape Strategy*, including many major benefits for the local community.
- 5.2 The group notes that the Richmond-upon-Thames Council's current lease of the surviving part of the original '87 acres' of publicly accessible parkland first leased by the Crown to the former Richmond Council in 1898 (now effectively reduced to some 73 acres of parkland through the construction of the Twickenham Road between 1930 and 1933 (some 5 acres), the creation of the Old Deer Park Car-park and the single-storey buildings for voluntary groups (some 5 acres), and by the development of *The Pools on the Park* complex and the adjacent car-park in the mid-'sixties (some 4 acres) is due to expire on the 4th.April, 2016.
- 5.3 The group notes that the Council's lease (dated 23rd.October, 1934) covering some 80 acres of land to both north and south of the Twickenham Road originally provided for a term of sixty years from 5th.April, 1932. However, an agreement between the Crown Estate Commissioners and Richmond-upon-Thames Council dated 27th.February, 1970, and a deed of variation dated 4th.May, 1971, provided *inter alia* for the extension of the term by twenty-four years from 5th.April, 1992 so as to expire on the 4th.April, 2016. It is assumed that the Council would wish to maintain existing arrangements for the use of parts of the Park for continued schools and amateur outdoor sports use, and limited parts for specified occasional use for fairs and circuses.
- 5.4 The group further notes that on the 27th.November, 1985, the Crown Estate granted a lease with a term of thirty-three years from the 5th.April, 1983, on the open land located to the rear of the former East Surrey Regiment Territorial Drill Hall of 1912 and Annexe of 1932, now occupied by the Royal Mail, and used as a playing field by the Richmond County School for Girls, close by, in Parkshot (now Richmond Adult Community College) from ca. 1960 until the closure of the School in 1974. This land was developed as a landscaped car-park by the Council (together with the other open land to the rear of the former County School, immediately adjacent, already owned by the Council (the freehold of the school and its grounds having passed to the Richmond-upon-Thames Council from the Surrey County Council on the re-organisation of local government in 1965) as an extension (with 106 spaces) to the existing Old Deer Park Car-park to the south-west (with 291 spaces), bringing up the total number of spaces

(with the 58-place extension on the Council's freehold land) to 455. The Council's lease on the leasehold part of the car-park extension expires on 4th April, 2016.

- 5.5 The Working Group notes that some 6.5 acres of this land was developed by the Council in the mid-1960s for the present, award-winning, statutorily-listed *Pools on the Park* swimming pools complex. The management and operation of the refurbished complex, including the gym and health club, and the landscaped grounds adjacent to the pools building are currently formalised through a Management Agreement between the Council to Spring Health Leisure, rather than through a sub-lease. It is assumed that the agreement terminates on 4th April, 2016 unless otherwise agreed between the parties.
- 5.6 The group notes that other, small parts of the Council's leasehold land are sub-leased for various leisure and other purposes. Part of the narrow strip of land between Old Palace Lane and the railway viaduct, together with the entire strip of land between the railway embankment and the rear of the residential properties further up Old Palace Lane, are sub-let as allotments – a much valued and well used resource for the local community. The group assumes that the British Legion club-house and ancillary buildings and the adjacent building occupied by the North Richmond Scout Group located on the east side of the original part of the Old Deer Park Car-park, and the buildings occupied by the Air Training Corps, the St. John's Ambulance Brigade and the Sea Cadet Corps located on the south side of the Car-park and backing on to the Network Rail owned land and railway cutting beyond, are the subject of separate sub-leases granted by the present Council and its predecessor over the years since the last War.
- 5.7 The group notes what is understood to be the intention to divide the leasing of the land within the Old Deer Park presently leased by the Council into two separate parts, north-west and south-east of the Twickenham Road, and would value clarification of the purpose of such an arrangement.
- 5.8 The lease of the largest part of the Park, comprising some 200 acres, is held by *The Royal Mid-Surrey Golf Club* and expires on 5th July, 2043.
- 5.9 The Working Group assumes that Richmond Athletic Association's lease of the some 25 acres of land in the eastern part of the Park expires on 4th April, 2016. The group assumes that Cannons Health and Squash Club, located in premises within the Athletic Ground, and London Scottish Rugby Football Club and Richmond Rugby Football Club have sub-leases granted by the Richmond Athletic Association which are co-terminus with the Association's own lease from the Crown Estate.
- 5.10 The group notes that that part of the Old Deer Park occupied by Richmond Cricket Club, London Welsh Rugby Football Club, Mid-Surrey Bowling Club, Richmond Tennis Club and Richmond Archery Club, comprising some 15 acres, is leased from the Crown Estate by Richmond Cricket Club. The lease expires in 2016. A Deed of Partnership between Richmond Cricket Club and London Welsh Rugby Football Club signed on 1st June, 1957, incorporates a sub-lease granted by the cricket club to the rugby club to occupy the ground for a term co-terminus with the main lease. Under the Deed of Partnership, the cricket club has the use of ground for five months of the year, and the rugby club for seven months. The Working Group understands that other sub-leases

granted by the cricket club provide for the occupation of specific parts of the land to Mid-Surrey Bowling Club, Richmond Tennis Club and Richmond Archery Club.

- 5.11 The Working Group assumes that the lease of that part of the Park occupied by *The King's Observatory* and the land immediately adjacent, comprising some 6.5 acres, is the subject of a new lease granted to the new residential owner by the Crown Estate, or of an assignment of the earlier lease granted by the Crown Estate to the former commercial occupier.
- 5.12 The group understands that the lease dated 8th December, 1972 on *the Richmond Royal Mail Delivery Office* off Park Lane (otherwise known as *The Post Office Depot*) expires in October, 2070 and that the Royal Mail sub-leases the Drill Hall part of the premises to the Territorial Army under a lease expiring in June, 2015 for use by the South-West London Army Cadet Force.

6. THE WORKING GROUP'S SUGGESTIONS REGARDING THE POTENTIAL OPPORTUNITIES ARISING FROM THE RENEWAL OF LEASES

- 6.1 The Working Group would urge that the imminent falling-in and renewal of the leases of key parts of the Old Deer Park – and of the various sub-leases – should be used as means of reversing the marked decline in the environmental condition of a number of key parts of the Park identified in paragraphs 4.1, 4.2 and 4.3 above and in the Crown Estate's *Landscape Strategy* and beginning to progress the policies, projects and landscape management recommendations contained in the *Strategy*.
- 6.2 The Working Group believes that particular priority needs to be given to reversing the deplorable state of the primary vehicular and pedestrian access to the Park from the Town – reinstating the missing Park Lane gateway-piers and marking and celebrating this important entry-point into the Park with a sensitively and imaginatively designed landscape scheme. For many visitors, this area serves as an entry-point to the Town as well as to the Park and should reflect the quality and character of Richmond. The group believes that the other entry-points into the Park should be similarly defined and celebrated (see below).
- 6.3 The Working Group considers that the pedestrian entry-points into the Park from Twickenham Bridge, from the lower end of Old Palace Lane by Asgill House, and from the towing-path close to Richmond Lock and Footbridge (in addition to those from Park Lane and Kew Foot Road referred to below) should be more clearly defined and celebrated. The group considers that there is considerable scope to improve the way-marking of safe and attractive pedestrian links between these entry-points, to and from the sports facilities at the heart of the Park, and between the footbridges across the railway and the Twickenham Road and the archways and underpass below the railway and Twickenham Road and Twickenham Bridge (see annotations in red on Map 5 included in Appendix 3).
- 6.4 As anticipated in the Crown Estate's *Landscape Strategy*, the Working Group considers that the potential relocation of the voluntary groups presently occupying the series of unattractive single-storey buildings adjacent to the Old Deer Park Car-Park into

- improved accommodation elsewhere within or adjacent to the Park would provide a positive opportunity for recovering the parkland character of an important part of the Park closest to the Town, and provide a natural space through which an attractive pedestrian route could be easily devised linking the improved Park Lane gateway directly with the much valued and attractive part of the Park between the railway and the Twickenham Road leading down towards the river.
- 6.5 The Working Group considers that particular attention should be given to improving safe and attractive pedestrian connection between those parts of the public Park to the north-west and south-east of the Twickenham Road pending the realisation of the project for the creation of a sensitively and imaginatively designed pedestrian bridge as recommended in the *Landscape Strategy*. The group believes that more modest benefits might be secured in the shorter term by the adoption of more affordable measures, such as the opening-up and enhancement of the existing underpass below the Twickenham Road, the realignment of the lowest ramp of the existing bridge on the south-east side of the Twickenham Road in order to relate more directly to an enhanced pedestrian route through the car-park, and possibly too, the provision of a second at-grade, light-controlled, pedestrian crossing.
- 6.6 With a view to encouraging increased and improved use of the Old Deer Park for outdoor sports uses by schools and local amateur clubs, and in providing enhanced facilities for voluntary groups presently located adjacent to the Old Deer Park Car-park, the Working Group suggests that consideration should be given to the potential conversion and extension or reconstruction of the unused or little used, Council-owned ancillary building located to the immediate north-west of the landscaped grounds of *The Pools on the Park* complex (and outside the boundary of Project R 8) and to the extension or reconstruction of the much-used, sports changing-rooms and club-room building, thus providing a central location (with direct public-transport access) for functions and facilities relating to the use of the public park for outdoor, amateur sports and other recreational purposes.
- 6.7 The group considers that a coherent study needs to be commissioned as a matter of urgency addressing the very poor state of the area within the north-eastern part of the *Richmond Athletic Association's* ground adjacent to the Kew Foot Road, once the home of *Richmond Town Bowling Club*, including the once immaculately tended bowling-green, the now derelict club-house, and the run-down condition of the boundary wall and entrance gateways opposite *The Triple Crown*, P.H. and *The Royal Hospital*, and formulating measures through which these problems can be speedily and effectively resolved.
- 6.8 The Working Group considers that particular attention needs to be given to addressing and resolving the adverse effects of the enlarged surfaced areas devoted to car-parking within the *Athletic Association's* ground and of the significant number of unattractive ancillary buildings, structures and fences within the ground and on improving the entrances to the ground from the Twickenham Road and Kew Foot Road.
- 6.9 The group believes that consideration should be given to exploring and realising landscaping measures for mitigating the visual and acoustic impact of vehicular traffic as it passes along the Twickenham Road through the Park, and defining more clearly and celebrating the point where the Twickenham Road enters the Old Deer Park from the east close to the site of the former Clarence Gate; distinguishing the stretch of the road

- that passes through the historic Park from the remainder of the A.316 to the east and the south-west.
- 6.10 The group believes that particular priority needs to be given to reversing the deplorable state of the long-closed public conveniences adjacent to the Old Deer Park Car-park, securing the sensitive repair and appropriate re-use of this attractive little building.
 - 6.11 The Working Group considers that particular attention needs to be given to addressing and resolving the poorly designed and insensitively located banner-signs and other features that seriously detract from the external appearance and architectural integrity of the listed, award-winning *Pools on the Park* swimming pools complex building.
 - 6.12 Finally, the group suggests that that consideration should be given to exploring and realising landscaping measures to provide sloping, bonded gravel pathways running obliquely down the embankments to either side of the Twickenham Road at the north-east end of Twickenham Bridge at a shallow gradient to facilitate access into the Park for pedestrians crossing from the St. Margarets side of the bridge.

7. CONCLUSION

- 7.1 The Working Group understands that discussions between the Crown Estate and Council officers about the renewal of the Council's lease of the public part of the Park are being undertaken and that the Crown Estate has or is appointing consultants to prepare a *Leisure and Development Plan*. The Working Group is concerned that such a plan should be firmly based on the Estate's 1999 *Landscape Strategy* and should not involve any built development within the Park other than that which is wholly consistent with the policies set out in the *Landscape strategy* as underpinned by national, metropolitan and local conservation and planning policies.
- 7.2 The Working Group believes that the Crown Estate should progress the future management of its Old Deer Park estate with a view to assuring its effective conservation and enhancement and ensuring that any development that might be advanced within the area should not only be sustainable in the fullest sense but also consistent with the designation of the Park as a conservation area and its inclusion on English Heritage's *Register of Parks and Gardens of Special Historic Interest* and in the buffer-zone of the *Royal Botanic Gardens, Kew World Heritage Site*. The group believes that only that development which serves the interests of the Park as a much valued open space and as a resource for continued outdoor schools and amateur sports should be encouraged.
- 7.3 The Working Group stresses its readiness to engage in discussions with the Crown Estate and its professional team, Council members and officers, and all others with a direct or other interest in the future use and management of the Park, with a view to encouraging the effective conservation and enhancement of the Old Deer Park.
- 7.4 Finally and importantly, the Working Group urges the Council to give urgent consideration to reviewing and adjusting limited sections of the boundaries of *Metropolitan Open Land, Public Open Space and the Richmond Town Centre* in the area of the Old Deer Park as presently drawn in the Council's *Local Development Framework*

Proposals Map, Adopted November, 2011, as repeatedly urged by groups in the local community over past years, in order to remedy the serious zoning anomalies referred to in paragraphs 2.5, 2.6 and 4.5 above.

COMMENTS ON THIS REPORT

Any written comments or suggestions relating to the issues raised in this report should be sent to The Old Deer Park Working Group, c/o The Hon. Secretary, The Richmond Society, 5, Kelvin Court, Marlborough Road, Richmond, T.W.10. 6.J.S. or e-mailed to secretary@richmondsociety.co.uk.



APPENDIX I

THE CONSTITUENT MEMBERS OF THE WORKING GROUP

The Richmond Society

The Richmond Society was founded in 1957 and has a long established reputation for positive engagement in local conservation, development and planning issues. The Society has charitable status and has approaching one thousand paid members, generally without restriction. The Society encourages an active interest in Richmond and its community. It is run by a committee of volunteers who communicate with members through regular newsletters and meetings. Its interests include the natural and built environment, infrastructure which includes roads, transport and aircraft, and uses of Richmond town and surrounds in terms of licensing, policing, cleansing and events. The Society campaigns to preserve and enhance Richmond's historic character and the quality of life for residents and visitors. It arranges events for social interaction and enjoyment of its members and the public. It works with other amenity groups and the Council and other public bodies. It covers no defined geographical area but focuses on Richmond Town and its surrounds, including the associated stretch of the River Thames. It has sound finances and raises funds from subscriptions, legacies and campaigns. The money raised is used to run the charity and to invest in projects that benefit the community.

The Kew Society

The Kew Society, founded more than one hundred years ago, is an influential organisation dedicated to enhancing the beauty of Kew and preserving its heritage. It became a Society in the 1970s and a Registered Charity in 1987 and remains as one of the larger and more active community groups in Greater London, with a subscribed membership of around six hundred. Its main aims are to review all planning applications in Kew with special regard to the architectural integrity and heritage of the neighbourhood and to play an active role in the improvement of local amenities. To achieve its aims, The Kew Society works closely with local authority councillors and the Member of Parliament; monitors all the planning applications and comments as needed; makes representations to public and private organisations; and provides a forum for local groups to strengthen Kew's voice in the area and in London. The Society is run by unpaid volunteers. The Executive Committee meets eleven times a year while sub-committees look after particular areas of interest. The society organises community events including parties, picnics, lectures and outings and produces the *On Kew* newsletter with information about general local issues, events, planning matters and forthcoming activities.

The Friends of Richmond Green

The Friends of Richmond Green is an amenity action group. It operates for the benefit of residents located in the immediate vicinity of The Green. In geographical terms, the FoRG 'constituency' encompasses the area bounded by the triangle of the railway line, the river Thames and George Street. Its key aims and objectives are: To promote

public interest and civic pride in Richmond Green and vicinity; To improve the quality of life and long-term attractiveness for residents; To improve the character and quality of the built and natural environments; and To encourage responsible use of The Green and surrounding area. FoRG was started over forty years ago and has worked with the Council and other local groups on a number of projects – major improvements to the pedestrian Gateway to Richmond between Old Deer Park and Richmond Green; the up-grading of the network of paths on the Green. A current project is looking into the re-installation of the crested bollards and rails on Greenside to tie in with the Queen's Diamond Jubilee. FoRG initiated the formation of the *Richmond Heathrow Campaign* (RHC). The RHC, convened by Friends of Richmond Green and the Richmond and Kew Societies, amalgamates and co-ordinates the efforts of the three bodies to more effectively represent our mutual interests as far as Heathrow expansion and related proposals are concerned. FoRG successfully lobbied the Council to revise the daily timetable for litter collection and in the last couple of years we have seen major improvements in this area. Membership is open to any person who resides in the immediate vicinity of the Green. We do not currently levy any form of charge on our members. Management is vested in an Executive Committee which meets around 8 times a year. The committee and officers are elected each year at an AGM. A newsletter is produced annually.

The Friends of Old Deer Park

Established in 1987, The Friends of Old Deer Park is a group within the local community constituted with the overall aims of fostering, promoting and sustaining recognition and appreciation of the unique parkland character, amenity value, and particular historic, architectural, archaeological and ecological interest of the Old Deer Park, and securing its preservation and enhancement for the benefit of all. The Friends played an important role in supporting the establishment of the working group for *The Thames Landscape Strategy* in 1991, and successfully worked for and secured the designation of the Old Deer Park by the London Borough of Richmond upon Thames Council as a conservation area in June, 1990, the inclusion of the Old Deer Park on English Heritage's *Register of Parks and Gardens of Special Historic Interest* (as an integral part of the already registered grade I Royal Botanic Gardens, Kew historic landscape) in June, 1998, and its inclusion within the buffer-zone of *The Royal Botanic Gardens, Kew World Heritage Site* in 2003, and the listing of the 1960s *Richmond Swimming Pools* complex in January, 1996, and the late-Victorian sports pavilion/grandstand in the grounds leased by *Richmond Athletic Association* in November, 1997.

The St. Margarets Estate Residents Association

The St. Margarets Estate Residents Association was established some forty years ago to protect and conserve the area that originally covered the St Margaret's Estate of 1854. The Association includes approximately 330 houses, mainly within the area bounded by the A316, St Margaret's Road, Kilmorey Road and Ranelagh Drive which looks over the river onto the Old Deer Park. The main remit of the Association is to monitor all planning applications within the boundaries of the Association and it also monitors tree lopping and felling, traffic, aircraft noise and any other matter that affects the environment.

APPENDIX 2

THE DETAILED COMMENTS OF THE WORKING GROUP ON SPECIFIC ASPECTS OF THE CROWN ESTATE'S LANDSCAPE STRATEGY

- A2.1. The group endorses unreservedly the three 'Guiding policies' and supports the realisation or completion of the three 'Principal projects' and the adoption of the three recommendations regarding general landscape maintenance set out under the Summary of the *Landscape Strategy*.
- A2.2. The Working Group welcomes and concurs fully with the assessments of the significance of the Old Deer Park set out in Sections 4, 5 and 6 of the *Landscape Strategy* on the significance of the Old Deer Park.
- A2.3. The group keenly supports the four policies, one project and one landscape management recommendation relating to 'Significance' recommended under paragraph 4.17 of the *Landscape Strategy*.
- A2.4. The Working Group endorses the four policies, four projects and one landscape management recommendation relating to 'Contemporary use' recommended under paragraph 5.14 of the *Landscape Strategy*. However, the group recognises that the realisation of the first of the four projects (which, it assumes, would involve the removal of the existing footbridge) would be costly and may well take a considerable time to implement and that more modest but still valuable benefits might be secured in the shorter term by the adoption of more affordable measures, such as the re-opening and enhancement of the existing underpass below the Twickenham Road, the re-alignment of the lowest ramp of the existing footbridge on the south-east side of the Twickenham Road in order to relate more directly to the pedestrian route through the car-park, and possibly too, the provision of a second, at-grade, light-controlled pedestrian-crossing, subject to sensitive design.
- A2.5. The group welcomes and supports the recommendations relating to 'Nature Conservation' set out in paragraphs 6.4, 6.6, 6.10 and 6.15 of the *Landscape Strategy*.
- A2.6. The Working Group endorses the three policies and one project relating to 'Urban context' recommended under paragraph 7.6 of the *Landscape Strategy*.
- A2.7. The group endorses wholeheartedly the recommendation regarding the potential pivotal role of the Crown Estate relating to 'The landscape of the Old Deer Park' set out in paragraph 8.5 of the *Landscape Strategy*.
- A2.8. The Working Group supports the one policy, seven of the eight projects and three landscape maintenance recommendations relating to the central part of the Old Deer Park recommended under paragraph 9.9 of the *Landscape Strategy*. However, the group believes that the removal of the ornamental plantings under the second of the eight projects should only be pursued if the health of the cherries, maples, robinias and poplars gives rise to serious concern and their future survival is in doubt.

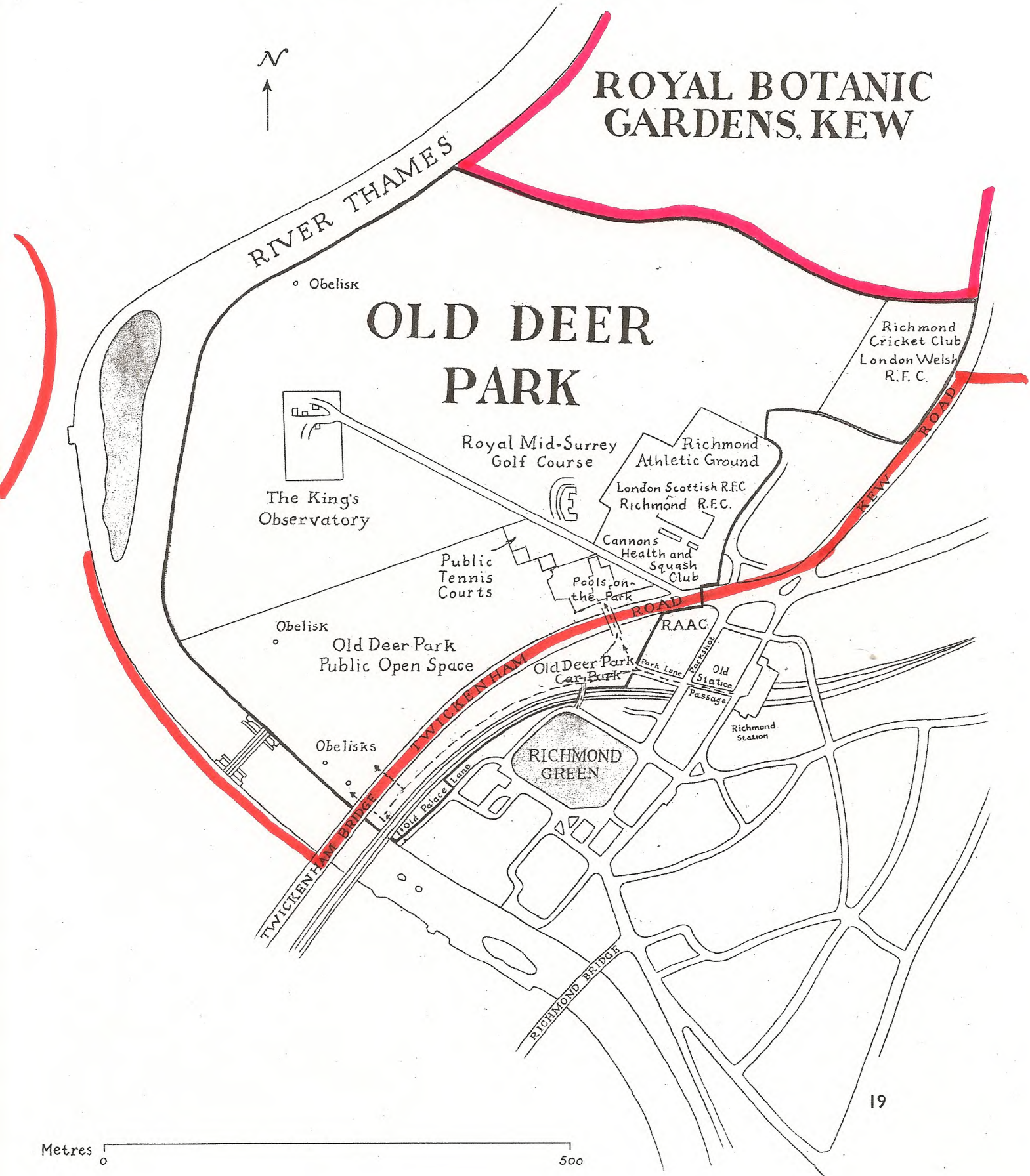
- A2.9 The group welcomes and concurs fully with the assessment of the present condition of the southern part of the Old Deer Park – in particular, that of the area around the Old Deer Park Car-park (covered in paragraphs 9.14, 9.16 and 9.17) and fully endorses the three policies, thirteen projects and three landscape maintenance recommendations relating to the southern part of the Old Deer Park recommended under paragraph 9.22 of the *Landscape Strategy*. However, in relation to the second of the thirteen projects and as noted in paragraph A2.4 above, the group recognises that that the realisation of the project may well take a considerable time and that more modest benefits might be secured in the shorter term by the adoption of more affordable measures, such as the re-opening and enhancement of the existing underpass below the Twickenham Road, the re-alignment of the lowest ramp of the existing footbridge on the south-east side of the Twickenham Road, and possibly too, the provision of a second at-grade, light-controlled pedestrian-crossing. In relation to the third and sixth of the thirteen projects, the group notes that the suggested works have been successfully completed in recent years.
- A2.10 The Working Group welcomes and concurs fully with the assessment of the present condition of the eastern part of the Old Deer Park – in particular, significant parts of the land leased by the *Richmond Athletic Association* and occupied by *London Scottish Rugby Football Club*, *Richmond Rugby Football Club* and *Cannons Health and Squash Club*, and the boundary wall along the Kew Foot Road (covered in paragraphs 9.28, 9.29 and 9.30) and fully endorses the four policies, ten projects and landscape management recommendation relating to the eastern part of the Park recommended under paragraph 9.31 of the *Landscape Strategy*.
- A2.11 The group supports the four projects and three landscape management recommendations relating to the western part of the Old Deer Park recommended under paragraph 9.36 of the *Landscape Strategy*, noting that much valuable work on realising the projects has been carried out successfully under the *Thames Landscape Strategy* and *Arcadia* projects.



APPENDIX 3

MAPS OF THE OLD DEER PARK SHOWING THE BOUNDARIES OF RELEVANT HERITAGE AND OTHER PLANNING DESIGNATIONS AND THE LOCATIONS OF POTENTIAL ENHANCED CONNECTIONS BETWEEN THE TOWN AND THE PARK

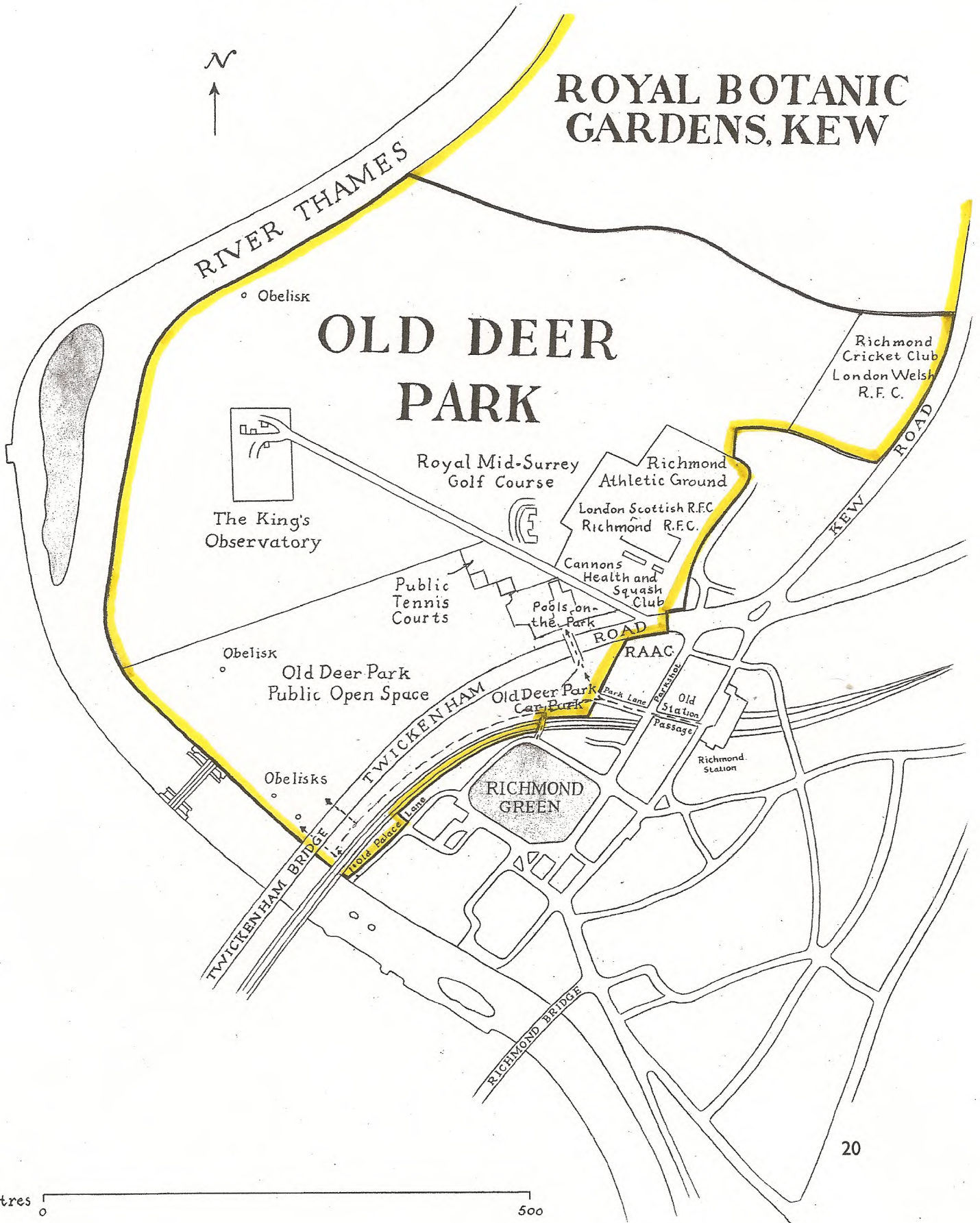
MAP 2 - THE BOUNDARIES OF THE ROYAL BOTANIC GARDENS, KEW
WORLD HERITAGE SITE AND BUFFER ZONE



MAP 3 - THE BOUNDARY OF THE ROYAL BOTANIC GARDENS - OLD DEER PARK REGISTERED LANDSCAPE

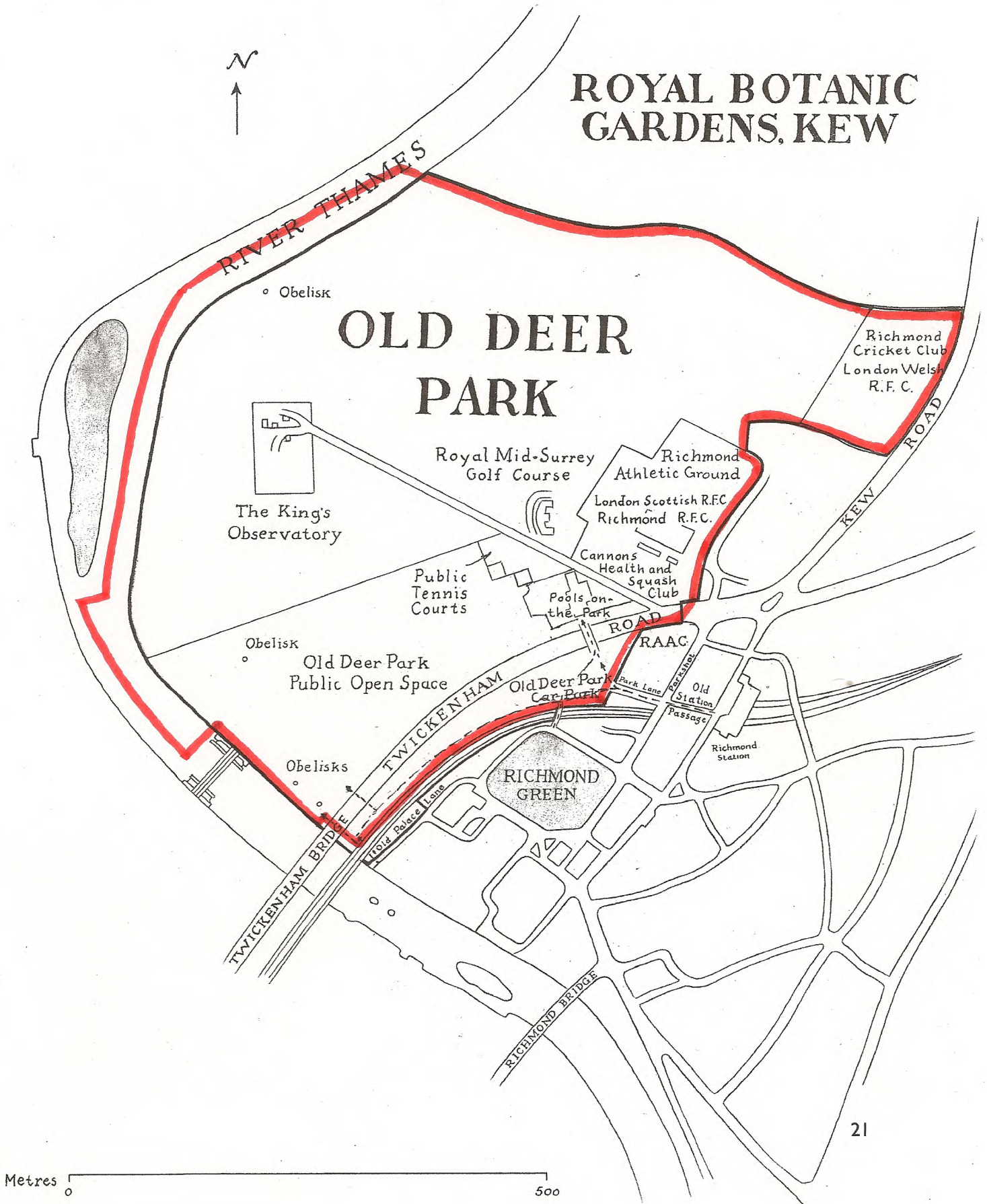
ROYAL BOTANIC GARDENS, KEW

OLD DEER PARK

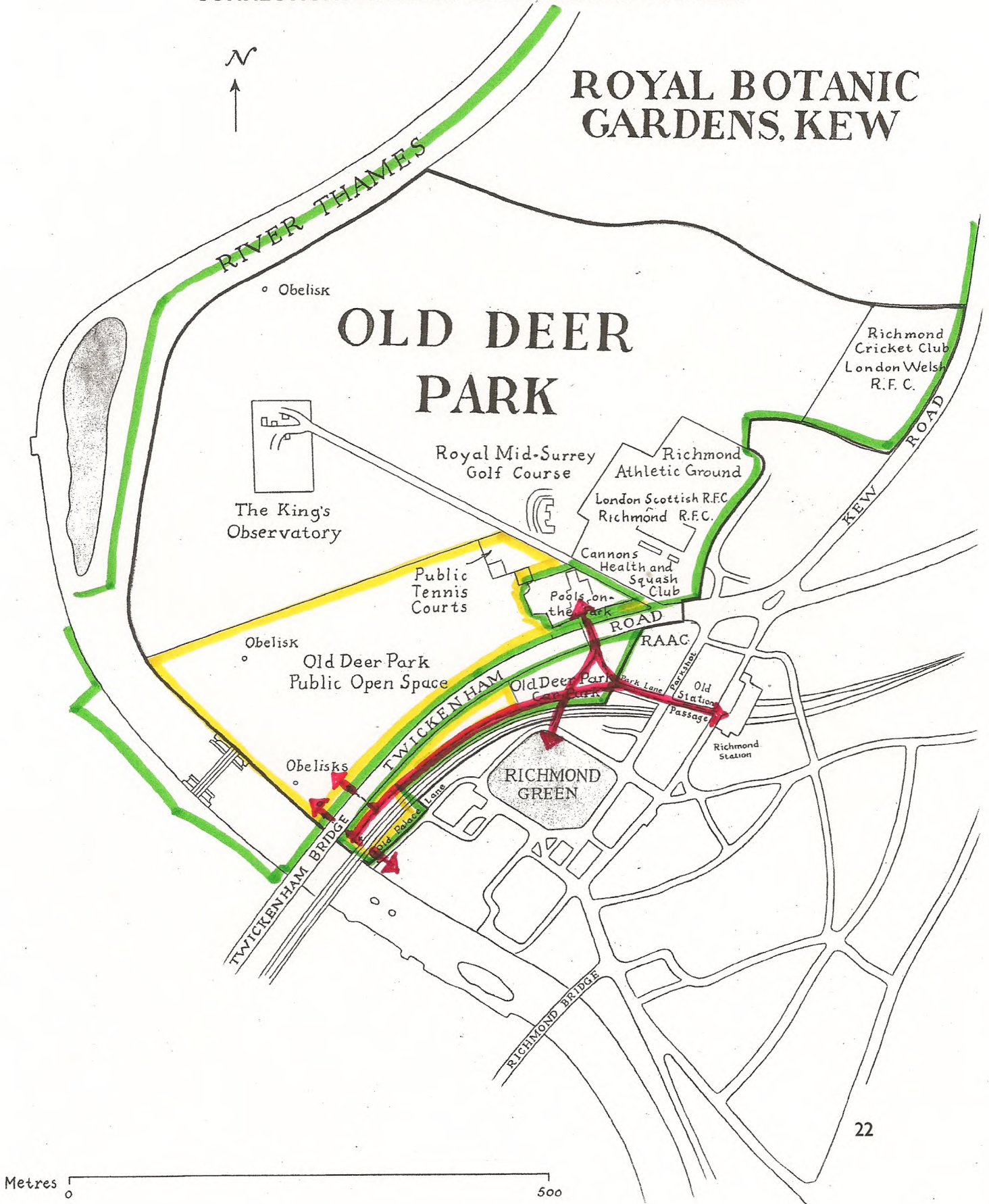


Metres 0 500

MAP 4 - THE BOUNDARY OF OLD DEER PARK CONSERVATION AREA



MAP 5 – THE BOUNDARIES OF METROPOLITAN OPEN LAND AND PUBLIC OPEN SPACE AND THE LOCATIONS OF POTENTIAL ENHANCED CONNECTIONS BETWEEN THE TOWN AND THE PARK



ROYAL BOTANIC GARDENS, KEW

OLD DEER PARK

The King's Observatory

Royal Mid-Surrey Golf Course

Richmond Athletic Ground

Richmond Cricket Club
London Welsh R.F.C.

London Scottish R.F.C.
Richmond R.F.C.

Public Tennis Courts

Cannons Health and Squash Club

Pools on the Park

Old Deer Park Public Open Space

Old Deer Park Car Park

RICHMOND GREEN

RAAC

Park Lane

Fore Lane

Old Station Passage

Richmond Station

Obelisks

Obelisks

Old Palace Lane

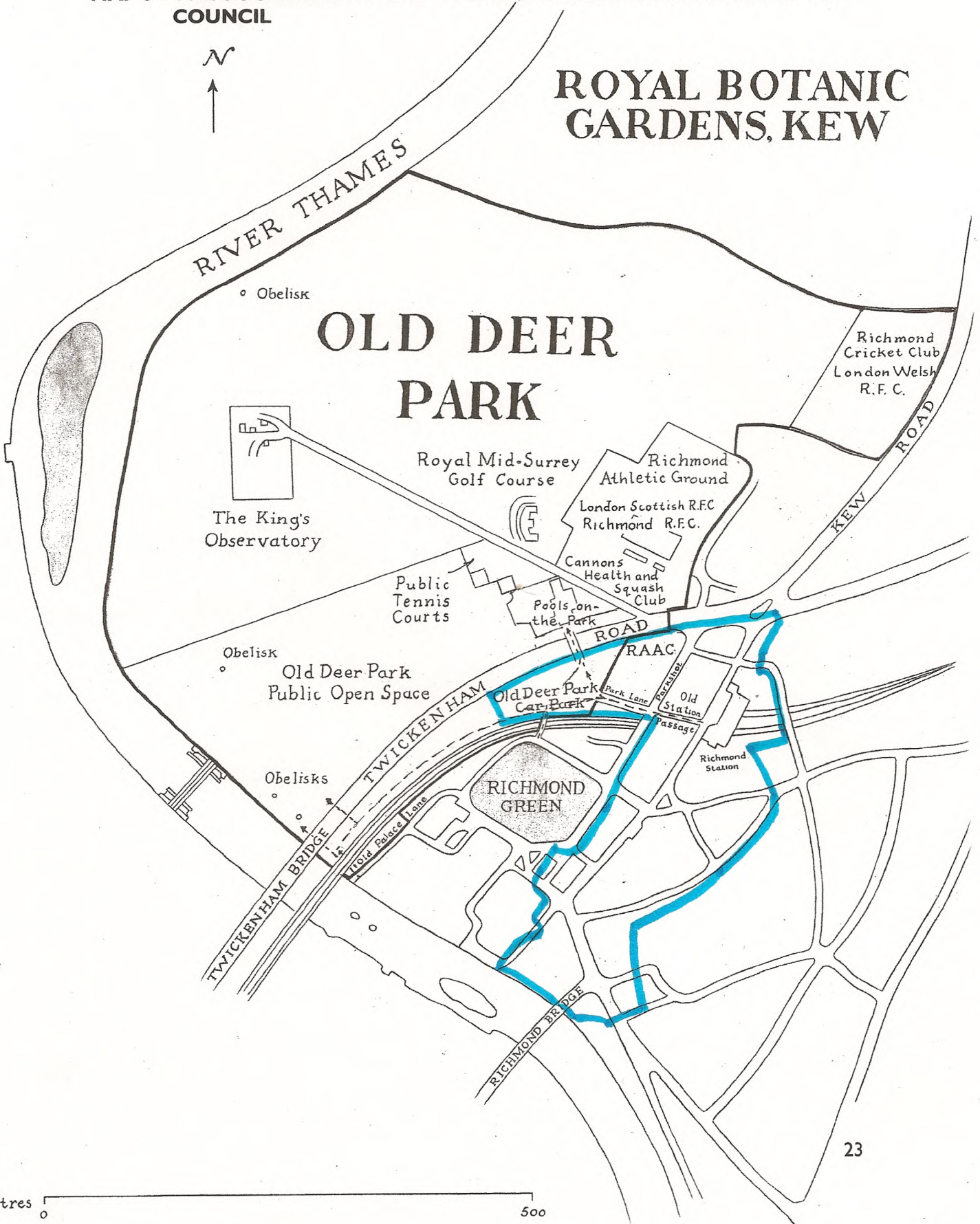
RICHMOND BRIDGE

Metres 0 500

MAP 6 - THE BOUNDARY OF THE TOWN CENTRE AS DESIGNATED BY THE COUNCIL



ROYAL BOTANIC GARDENS, KEW



Metres 0 500



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