

**LONDON BOROUGH OF RICHMOND UPON THAMES**

**LOCAL PLAN EXAMINATION**

**Main Matter 17 – Increasing biodiversity and the quality of our green and blue spaces, and greening the borough (Policy 34 – 43)**

**Representations made on behalf of Mr David Harvey Taylor.**



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1. The comments made on behalf of David Taylor centre on Policy 35 of the draft plan, Green Belt, Metropolitan Open Land and Local Green Space. While there is no suggestion that the policies controlling development in the green belt are unsound, Mr Taylor's principal point is that the manner of the green belt review undertaken by the council as part of the local plan process, is unsound, and questions need to be asked regarding whether the methodology used was acceptable given the parameters set and whether on that basis the conclusions of the review are sound. Mr Taylor's position is that the review as carried out was not sound and did not meet standing policy guidance in the NPPF, and therefore that the local plan is unsound and will remain so until an acceptable review is concluded. My Taylor also considers land at Lower Hampton Road, as shown on Plan 1 included in this statement, should be excluded from the green belt.
2. The background to this position is the Open Land Review (Green Belt, MOL, LGS and OOLTI) (2021,) which purported to be a review of all the land designated as Green Belt, MOL, LGS and OOLTI It was stated to be an objective and evidence-based assessment of how the currently protected areas contribute to the purposes and criteria set out in paragraph 138 of the NPPF (2021).
3. A Green Belt Assessment Annex Report (LBRuT/280138-00/001/v0.1 dated 26/08/2021) contained more detailed examination of green belt area.
4. The General Areas were assessed against NPPF (2021) Green Belt purposes 1-3:
  - to check the unrestricted sprawl of the large built up areas,
  - to prevent neighbouring towns merging into one another, and
  - to assist in safeguarding the countryside from encroachment
5. Purpose 4 was excluded as none of the settlements within the borough within close proximity to the Green Belt meet the definition of a historic town.
6. While for purpose 5, 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'; the statement was made "*it is difficult to distinguish the individual contribution that*

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*a single parcel of land makes to encouraging the re-use of urban land and so this purpose was not considered.”*

7. Purpose 5 is equally important in green belt assessment terms to purposes 1 -5, and there is no appropriate or logical reason to exclude consideration of the purpose in the green belt assessment undertaken by the council. Certainly, the fact that the assessment was deemed to be 'difficult' is no excuse at all not to engage with the issue. This is particularly the case since the council has so little green belt, proportionately and in total area, to the rest of its administrative area. Assessment of purpose 5 could easily have been carried out in detail, since it would have been necessary on only a very small number of areas, and arguably only 1 – the area owned by Mr Taylor.
8. In order to aid the Examination, that assessment is undertaken here, and it is relevant in the first instance to consider the context. Paragraph 21.10 of the plan confirms the fundamental aim of the Green Belt is to prevent urban sprawl by keeping land permanently open. One needs, however, to define the use of the word 'sprawl', which is the otherwise uncontrolled outward expansion of towns into the adjacent countryside. As a matter of principle, Mr Taylor's land at Lower Hampton Road cannot possibly introduce outward sprawl, because on the 'outward' side (i.e., that side furthest from the centre of the urban area) there is recent residential development. The site is merely an element of infill in the existing urban area.
9. In a locational sense, the site is bounded to the east by Sunnyside reservoir, a 'hard' boundary. The reservoir is a considerable and completely open space, totally different in character to the land owned by Mr Taylor. To the north the land bordered by Lower Hampton Road and Stain Hill reservoir - a similar 'hard' potential green belt boundary. To the west the site is bounded by two relatively new residential properties. To the south there is a substantial two storey established residential property. The site itself contains sheds, concrete hard standing, and other structures that are closely physically and visually related to the more urban development features of the adjoining land than to the reservoir openness. It is notable in this respect that the site is excluded from the Site of Importance for Nature Conservation (Policy 39), thus emphasising further the difference in the circumstances of the site in comparison to adjoining land.

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10. There is no physical, visual or policy logic in retaining the land in the green belt. All of these conclusions are masked by the fact that the assessment carried out for the council by ARUP took no regard of the existence of the reservoirs' hard embankment boundaries and the relationship of the land to its immediate neighbours.
11. Regardless, therefore, of the performance of the General Area to other green belt criteria, the failure to assess the site from a more granular point of view – a relatively simple exercise – means that there is no proposal to remove the land from the green belt.
12. Consider also the prospect the removal of the land from the green belt would result in pressure for its development that would be difficult to resist. Having regard to the fact that the site lies within an urban environment (albeit that that has a 'hard edge' created by the adjacent reservoir embankments) additional development of the site in a manner similar to that already existing on the immediately adjoining land to the west would have no adverse impact. It would not impact at all on the green belt or the setting of the green belt, and in fact it would emphasise the openness of the adjoining area to the east. The release of land from the green belt would therefore provide an acceptable opportunity to recycle an area of derelict urban land and thus to assist in urban regeneration.
13. It seems to Mr Taylor to be perfectly clear that the land will make a contribution to regeneration. That contribution would be small, but it is not a requirement of the NPPF that such a contribution should be significant. In any event, it is measurable. The failure of the council's green belt assessment even to undertake the exercise demonstrates a worrying lack of completeness and in fact makes the Green Belt assessment process inherently unsound. This short statement demonstrates that there is considerable merit in amending the draft plan to revise the green belt boundary to directly follow the reservoirs' hard embankment boundaries (to north & east), and to exclude from green belt designation Mr Taylor's pocket of brownfield land.

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PLAN 1 – Proposed revision to the green belt boundary – excluded land edged red

