

RW/CO
06th June 2024

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Dear Charlotte,

London Borough of Richmond Upon Thames Local Plan Examination Written Statement on behalf of Rugby Football Union

On behalf of our client, the Rugby Football Union ('RFU'), we are writing to submit a further written statement to address the Matters, Issues and Questions set out for the London Borough of Richmond upon Thames ('LBRuT') Local Plan Examination. This statement should be read in conjunction with the representations made by RFU to the previous Regulation 18 and Regulation 19 consultations.

We are pleased to note that a number of comments set out in our previous representations have been considered in preparing the draft Local Plan. We are supportive of these modifications, particularly those which have clarified the important role of Twickenham Stadium for both sport and entertainment uses. However, in our considered opinion, there remain some key areas where the Plan may not be justified, effective or consistent with national or London Plan policy. These are set out below under the relevant Matters, Issues and Questions for the hearing.

Main Matter 6 – Twickenham, Strawberry Hill & St Margarets (Site Allocations 10 – 19)

Question - Is the area strategy and are the site allocation policies justified by appropriate available evidence, having regard to national guidance and local context; and are they in 'general conformity' with the LP?

Twickenham Stadium and the land immediately surrounding forms part of the proposed Site Allocation 13 of the draft Local Plan. The RFU strongly support the inclusion of the allocation for the Twickenham Stadium site which reflects the strategic nature of the Twickenham Stadium and of a working partnership with the Council to develop a Masterplan for the site.



The Allocation currently acknowledges that the Duke of Northumberland River runs along the western boundary of the site, which is regarded an important nature corridor and designated as Metropolitan Open Land ('MOL'). This designation spans to the west and north of the Twickenham Stadium within Site Allocation 13 as demonstrated in the following plan. This MOL strip currently consists of an area of hardstanding utilised for car parking and temporary buildings associated with the stadium (images of which can be found within the RFU Regulation 19 representations appended to this letter).



Figure 1 – MOL Parcel 36 (Kneller Chase Bridge)

London Plan Policy G3 'Metropolitan Open Land' sets out that where appropriate, Boroughs should designate MOL by establishing that land meets at least one of the following criteria as set out in Part B of the policy:

- 1. It contributes to the physical structure of London by being clearly distinguishable from the built-up area*
- 2. It includes open air facilities, especially for leisure, recreation, sport, the arts and cultural activities, which serve either the whole or significant parts of London*
- 3. It contains features or landscapes (historic, recreational, biodiverse) of either national or metropolitan value*
- 4. It forms part of a strategic corridor, node or link in the network of green infrastructure and meets one of the above criteria.*

Part (c) of the above policy notes that alterations to the boundary of MOL should be undertaken through the Local Plan process and should only be changed in exceptional circumstances when this is fully evidenced and justified, taking into account the purposes for including land in MOL set out in Part B.

Draft LBRuT Local Plan Policy 35 states that MOL land will be protected and retained in predominantly open use with appropriate uses within MOL to include public and private open spaces and playing fields, outdoor recreation and sport, biodiversity including rivers and bodies of water, open community uses including allotments and cemeteries. When considering developments in proximity



to MOL, the policy sets out that any possible visual impacts on the character, local distinctiveness and openness of the MOL will be taken into account.

As part of the evidence base to the emerging Local Plan, Arup carried out a Green Belt, MOL, LGS and OOLTI Review, with further detail contained within the accompanying Metropolitan Open Land Review Annex Report (detailed assessment) (August 2021). The later document included a detailed review of the parcel of MOL land known as 'Kneller Chase Bridge' (Parcel 36) part of which sits within Site Allocation 13 against London Plan (2021) criteria.



Figure 1 – MOL Parcel 36 (Kneller Chase Bridge)

The Report concludes the following with regards to the strip of land to the north and west of Twickenham Stadium contained within Site Allocation 13:

- *'Built development is notable within the eastern parcel which contains Chase Bridge Primary School and hard standing to the east of the Duke of Northumberland River associated with Twickenham Stadium.'*
- *'The eastern edge of the parcel is dominated by hard standing, with no identifiable boundary features and has open views of the directly adjacent Twickenham Stadium, resulting in no sense of openness.'*
- *'The path along the Duke of Northumberland River provides the only publicly accessible part of the parcel.'*
- *'The river section of the parcel is designated as a SINC (borough) and OSNI including a valued green corridor at the Duke of Northumberland River.'*
- *'Hard standing east of the river associated with Twickenham Stadium is likely to provide no wildlife value.'*

The report therefore concludes that:

'Overall the parcel fulfils its role for MOL purposes...However, the eastern edge of the parcel is developed and does not meet the MOL criteria'.

And goes on to recommend that:



‘The eastern edge of the parcel, hard standing associated with Twickenham Stadium, meets none of the MOL criteria and its is recommended that its MOL status is considered further’.

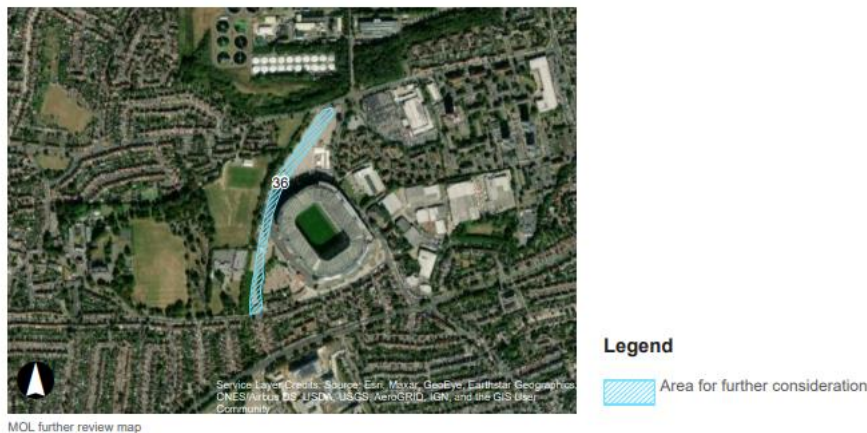


Figure 2 – Eastern Edge of Parcel 36 identified as area for MOL further review

As detailed within both the Regulation 18 and Regulation 19 representations, and as confirmed by the MOL Review Annex Report, the designation of the eastern strip of Parcel 36 as MOL land does not meet the criteria as set out in London Plan Policy G3 and the RFU have therefore requested its removal.

In response to the RFU’s Regulation 19 representation on the matter, the Council (within the Council’s Response summary dated January 2024) responded as follows:

‘The Council have considered the strip of land outlined in the comment 464, however maintains its position that due to the balance of planning factors the MOL designation should not be removed and the requirements as set out currently within Site Allocation 13 in relation to MOL should be retained. Arup’s assessment makes clear the limitations of their report, that it is within the Council’s power to make decisions on the designation of open space taking into account a number of factors including the Local Plan’s strategy, ability to meet housing need and the wider evidence base. It is noted that the land is designated wholly as an area which is public open space deficient and partly as a Site of Importance for Nature Conservation (Duke of Northumberland’s River). The status of the land could be improved’.

The Council reference the wider Local Plan strategy and ability to meet housing need as a reason for inclusion of the strip of land as MOL. We query the role the strip plays in specifically allowing for the delivery of housing, given London Plan Policy G3 and draft Local Plan Policy 35 requirements to protect from inappropriate development and to enhance the quality and range of appropriate uses of MOL. We also deem the need to meet wider Local Plan strategy to be unspecific and request that the Inspector seek further information as to the strategies the de-designation of this strip of hardstanding would prevent the Council from meeting.

The Council’s response also fails to distinguish between the different designations and associated protective policies between open space, SINC and MOL. The RFU acknowledge the importance of the Duke of Northumberland River as a valued green corridor and support its designation as a SINC. The



SINC designation in itself ensures that the river corridor is protected in line with Local Plan Policy G6. The RFU also support the inclusion of a requirement to explore enhancements to the Duke of Northumberland River within Site Allocation 13 as part of any development coming forward adjacent to the river. Together these policy requirements will seek to protect and enhance the area of greening and ecological importance within Site Allocation 13 without the need for the strip to be designated as MOL.

In conclusion, we deem that the designation of the strip of MOL Parcel 36 land to the west and north of Twickenham Stadium forming part of Site Allocation 13 should be removed for the following reasons:

- The strip of land is currently in use as hard standing and utilised for carparking and temporary buildings.
- The strip has been subject to a third-party assessment which forms the evidence base to the draft Local Plan and has concluded that it does not meet the London Plan G3 MOL criteria.
- The land adjacent to the Duke of Northumberland's River is designated as a SINC and sees protection by virtue of London Plan Policy G6.
- Draft Local Plan Policy 35 requires developments in close proximity to MOL land to consider visual impacts and openness of the MOL which any future development within Site Allocation 13 would need to recognise.
- Site Allocation 13 includes the requirement to explore enhancements to the Duke of Northumberland River which would require the RFU to consider improvements to the river corridor.

We therefore request that the Inspector consider the removal of the MOL land to the west and north of Twickenham Stadium within Site Allocation 13.

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

Question - Are the requirements of the increasing biodiversity and the quality of our green and blue spaces, and greening the borough policies justified by appropriate available evidence, having regard to national guidance, local context, and meeting the requirements of the London Plan?

The above comments in relation to Main Matter 6 are equally relevant draft Policy 35 regarding MOL and should therefore also be read in relation to Matter 17 and the question detailed above.

Thank you for the opportunity to comment and we look forward to discussing these matters further at the Hearing.

Yours faithfully

DP9 Ltd

DP9 Ltd.



Appendix 1 – RFU Regulation 19 Representation

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24 July 2023

By email only to: localplan@richmond.gov.uk

RE: RICHMOND ‘PUBLICATION’ DRAFT LOCAL PLAN (REGULATION 19)

On behalf of our client, the Rugby Football Union (‘RFU’), CBRE issued representations in response to the London Borough of Richmond upon Thames (LBRuT) ‘Pre-Publication’ Draft Local Plan (Regulation 18) in January 2022. These representations primarily related to Site Allocation 13 (SA13) (Twickenham Stadium, Twickenham) which covers 12.62 hectares of land in the RFU’s ownership.

Using the feedback submitted during the ‘Pre-Publication’ version consultation, a revised Draft Local Plan has been prepared by LBRuT: the ‘Publication’ Draft Local Plan (Regulation 19). Consultation will take place from 9 June 2023 to 24 July 2023.

CBRE has reviewed both the Statement of Consultation (June 2023) (which includes the Council’s written response to each comment made during the Regulation 18 consultation), and the Regulation 19 version of the draft Local Plan, to determine where the RFU’s previous representations have been addressed, and the need for any further representations and modifications.

This letter provides further representations on the Regulation 19 version of the Draft Local Plan, again, primarily relating to Site Allocation SA13. The extent of SA13 is provided as **Figure 1** below.



Figure 1 – Site Allocation 13



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SITE ALLOCATION

The RFU strongly support the inclusion of an allocation which reflects the strategic nature of the Twickenham Stadium site, and welcome the suggestion of a working partnership with the Council to develop a Masterplan for the site and its long-term development.

The RFU has a long-term vision to improve and enhance Twickenham Stadium, and develop a masterplan to maximise the visitor experience and local economic benefits of this nationally significant venue and world famous landmark.

Vision – Proposed site, Twickenham Stadium

Within the Regulation 18 representations, the RFU proposed the main description within the Site Allocation be updated as follows (red text as additions).

*"The Council supports the continued use and improvement of the grounds for sports **and entertainment** uses. Appropriate additional facilities including new stands, indoor leisure, hotel or business uses, as well as **food and beverage, appropriate retail**, hospitality and conference facilities, may be supported provided that they are complementary to the main use of the site as a sports **and entertainment venue** ground".*

The Council's Statement of Consultation (June 2023) states that the primary sporting function of the Stadium and site must be protected and there is a risk that inclusion of 'entertainment' as an acceptable primary land use within the Site Allocation could dilute this protection, as it could not be guaranteed that sporting events would outnumber concerts/entertainment events, which would render the Stadium an entertainment venue and not a sporting stadium. As such, the specific reference to entertainment has not been added within the Regulation 19 Draft Local Plan, however the blue text below has been added, as follows:

*"The Council supports the continued use and improvement of the grounds for sport uses. Appropriate additional facilities including new stands, indoor leisure, hotel or business uses, as well as hospitality, conference facilities, **food and beverage and associated retail**, may be supported provided that they are complementary to the main use of the site as a sports ground".*

Whilst the main text has not been updated to include a reference to entertainment uses, the Site Allocation supporting text has been revised to reference the Council's recognition of the important revenue-generating role that entertainment uses on site have for the viability of the sporting Stadium. The following has been added to the supporting text.

"The Council recognises the important revenue-generating role that continued entertainment uses on site have for the viability of the sporting stadium. An entertainment use on site will be supported where it is secondary to the primary sporting function and where it has been demonstrated that there would be no unacceptable impact on the local road network and amenities of Twickenham residents."

Whilst this is welcomed, we remain of the view that some reference to entertainment uses should also be included in the Site Allocation's main description. This supporting use is commercially important to the RFU, and enables the Stadium to continue its primary function as a sports venue, and it is considered that this important function should be recognized within the site allocation, whilst acknowledging the primary sporting use.

At present, the Council have indicated that entertainment uses on site can take place up to 29 days within and per single calendar year, under permitted development. The number of additional concerts/entertainment events is controlled by the planning process and through conditions attached to previous planning permissions. In the recent past, the number of concerts has represented less than 10% of the major events that have taken place at the Stadium, therefore any concert use is clearly a secondary use to the primary use as a sporting venue. Any further potential increased use of the Stadium for concerts

would be controlled by the Council through the planning and licensing processes. Therefore, we consider that adding the following text would not prejudice the primary sporting use of Twickenham Stadium, or render the Stadium an entertainment venue rather than a sporting venue, and suggest the main description of the site allocation is updated accordingly. Using a dictionary definition, it is also considered that Twickenham Stadium should be referred to a 'sports venue' rather than a 'sports ground', as sports ground does not adequately define a modern, internationally significant sports venue.

*"The Council supports the continued use and improvement of the **venue grounds** for sports uses, **along with entertainment uses as a secondary/supporting land use**. Appropriate additional facilities including new stands, indoor leisure, hotel or business uses, as well as food and beverage, appropriate retail, hospitality and conference facilities, may be supported provided that they are complementary to the main use of the site as a sports **venue ground**".*

With regard to introducing other land uses on the site, the Council's Statement of Consultation (June 2023) notes that whilst the site currently has a Sui Generis land use, it is expected to have an existing employment-generating use. The RFU currently employs over 300 staff on full time contracts, in addition to circa. 6,000 part-time staff on matchdays. Third party analysis has also projected that Stadium activity supports a further circa. 1,270 FTE jobs in LBRuT and the London Borough of Hounslow. This would accord with the emerging Site Allocation, and to help meet the overarching vision set out in Strategic Policy 8 for Twickenham to have a strong local economy by rejuvenating its business and cultural offer.

The Site Allocation makes clear that a residential use would be considered, subject to sporting, then employment uses, first being investigated, and within the Council's Statement of Consultation (June 2023), it is confirmed that policy does not preclude a residential use coming forward on the site. This flexibility is welcomed, should new housing be proposed in the future.

Metropolitan Open Land

Within the Regulation 18 Local Plan representations, it was highlighted that p.117 of the Metropolitan Open Land (MOL) Review Annex Report (detailed assessment) (2021), which was prepared to support and inform the new Local Plan, states the following in relation to parcel no. 36 (Kneller Chase Bridge):

"The eastern edge of the parcel, hard standing associated with Twickenham Stadium, meets none of the MOL criteria and it is recommended that its MOL status is considered further".

An image showing the extent of the MOL parcel, from the Metropolitan Open Land (MOL) Review Annex Report (detailed assessment) is provided as **Figure 2** below and further relevant extracts are provided within **Appendix 1**.



Figure 2 – MOL Parcel 36 (shaded green)

In the RFU's Regulation 18 Local Plan representations, the purposes for designating MOL, according to London Plan Policy G3 (Metropolitan Open Land), were highlighted. The purposes are as follows:

1. it contributes to the physical structure of London by being clearly distinguishable from the built-up area;
2. it includes open air facilities, especially for leisure, recreation, sport, the arts and cultural activities, which serve either the whole or significant parts of London;
3. it contains features or landscapes (historic, recreational, biodiverse) of either national or metropolitan value; and
4. it forms part of a strategic corridor, node or a link in the network of green infrastructure and meets one of the above criteria.

Policy G3 states that alterations to MOL boundaries should be undertaken through the Local Plan process, when fully evidenced and justified. In the case of LBRuT, this was done through the MOL Review Annex Report.

As highlighted in the Regulation 18 representations, the MOL Review Annex Report evidences and justifies the de-designation of the eastern edge of the parcel, in accordance with London Plan Policy G3, as it meets none of the criteria highlighted above. Photographs showing how this area is used on match days and the general condition of the land are provided as **Appendix 2**.

However, in response to the RFU's Regulation 18 representations on this point, the Council's Statement of Consultation (June 2023) states,:

"The purpose of the MOL assessment was to assess the current value of land parcels against the MOL criteria and to suggest areas that the council should further consider as to their role as MOL within the new Local Plan. This site has been assessed by Arup as part of General Area 36. The Council have further considered the strip of land outlined in the comment, however the balance of planning factors has led to the Council's decision not to remove the land from the MOL designation and to retain the requirements as set out currently within Site Allocation 13 in relation to MOL."

We query what the planning factors are which balance against this assessment which formed part of the new Local Plan Evidence Base, which clearly confirms this part of the MOL does not warrant its designation, and does not have any public value.

Through Regulation 19 representations, we continue to request that, in accordance with London Plan Policy G3, the MOL designation is updated to properly reflect the Review's findings by removing the strip of MOL within the Stadium boundary, as it meets none of the MOL criteria. Associated amendments to the Proposals Map should therefore also be made.

We continue to request that the below extract of the Site Allocation (p.75-78) is reworded, to remove the reference to MOL following de-designation through the Local Plan process.

Current wording:

"Part of the site, adjacent to the Duke of Northumberland River, is designated Metropolitan Open Land (MOL). The Open Land Review 2021 found that the MOL strip of land to the east of the river should be improved as it forms part of the valued green corridor at the Duke of Northumberland's River to enhance provision for wildlife and access. Therefore, any development proposal is required to protect and, where possible, enhance, the Duke of Northumberland River, including access to it, and the associated MOL."

Proposed wording:

"The Open Land Review 2021 found that the strip of land to the east of the Duke of Northumberland River should be improved as it forms part of the valued green corridor to enhance provision for

wildlife and access. Therefore, any development proposal is required to protect and, where possible, enhance, the Duke of Northumberland River, including access to it.

The Open Land Review 2021 (MOL Annex Report 2021) also found that the hard standing associated with Twickenham Stadium meets none of the MOL criteria, and therefore this land has been removed from the designation. Notwithstanding, any development proposals for Twickenham Stadium would be required to meet Policy 35, and take into account possible impacts on the character, local distinctiveness and openness of the adjacent MOL”.

Associated with the above, we suggest that the text within Draft Policy 35 (p.243) is updated. We propose that a fourth change to the Policies Map is added (addition in red below).

“Proposed Changes to the Policies Map

A. Further to the recommendations in the Green Belt, MOL, LGS and OOLTI Review (2021), the following sites will have their MOL designation removed.

- 1. Carpark for Sainsburys, Uxbridge Road, Hampton (see Site Allocation 5)*
- 2. Parcel 48 of the Review: Front Gardens Hampton Court Road (East) - The parcel is a very small linear section comprising front gardens to residential properties along Hampton Court Road.*
- 3. Parcel 49 of the Review: Front Gardens Hampton Court Road (West) - The parcel is a very small linear section comprising front gardens to residential properties along Hampton Court Road.”*
- 4. Eastern edge (hardstanding associated with Twickenham Stadium) within Parcel 36 of the Review: Kneller Chase Bridge – This portion of the parcel which is linear, does not meet any of the MOL criteria.*

Design Objectives

The Urban Design Study 2021 locates the Twickenham Stadium complex within the Twickenham Residential character area, which is primarily characterised by Victorian residential properties located to the south of the stadium beyond Whitton Road and Chertsey Road. To the west is the Whitton and Heathfield Residential area, which is characterised by a suburban character and 1930s semi-detached terraced housing.

The Stadium comprises an 82,000 seat stadium, along with associated uses such as banqueting and conference facilities, a ticket office, a retail shop, a museum, a gymnasium and a hotel. The existing Stadium is equivalent to 13-stories in height.

The RFU acknowledges that the C2 Twickenham Residential character area in the Regulation 19 Local Plan notes the Stadium forms a ‘distinct sub area’. This is key, as it is clear that the Stadium is in contrast with the surrounding residential setting. It is also acknowledged that Under Sensitivity, the Twickenham Stadium is identified as ‘sub area b’, with a lower sensitivity and more able to accommodate change.

In response to CBRE’s Regulation 18 representations, highlighting the contradiction between the ‘vision’ section of the place-based strategy which states that “*Twickenham’s important sporting and cultural attractions will be maximised*” and the general protectionist stance within area C2, the Council has confirmed that the following wording has been added to the design guidance in the Urban Design Study, which is welcomed:

“Create a masterplan/vision for the area around Twickenham Stadium (sub area b) to encourage better integration of the stadium alongside opportunity for additional sporting and cultural attractions.”

The RFU will engage with LBRuT at an early stage on any evolving proposals for works to the Stadium and surrounding land. Any proposals would aim to align with Regulation 19 Draft Local Plan Strategic Policy 8 which states that: “*Twickenham’s important sporting and cultural attractions will be maximised and disruption to local residents and businesses minimised*”.

OTHER POLICIES

Policy 1 (Living Locally)

Through Regulation 18 Draft Local Plan representations, the RFU expressed support for the ‘living locally’ approach for access to essential services to fulfil daily needs, to reduce urban carbon emissions and biodiversity loss, however raised concern regarding the potential of this policy to limit movement and restrict journeys in the case of visitor attractions such as Twickenham Stadium.

In the Council’s Statement of Consultation (June 2023), it was noted that additional supporting text detailing the expectations for how applications will demonstrate compliance with the policy would be added. This has been added at para. 4.16, and this text acknowledges that application of this policy is proportionate to the scale and type of development. This is welcomed by the RFU, in the context of Twickenham Stadium.

The Regulation 19 Local Plan also includes an information note, confirming this policy is not seeking to restrict journeys, which is welcomed.

The ambitions of the RFU respond to the objectives of this policy, for example seeking to encourage cycling and use sustainable transport modes through transport improvements, prioritising access and inclusivity at the Stadium, facilitating a thriving local economy, and creating high-quality green infrastructure and public realm.

Policy 18 (Development in Centres)

As drafted in the Regulation 19 Local Plan, Policy 18 (part C) states:

“C. Major development and/or developments which generate high levels of trips should be located within a town centre boundary. Elsewhere development within the local centre boundary should serve as more localised provision, which may include opportunities for retail, recreation, and smaller-scale employment uses.”

As highlighted in the RFU’s Regulation 18 representations, this does not acknowledge the high level of trips from attractions such as Twickenham Stadium, and the objective to enhance the existing facilities as supported in Site Allocation 13.

However, in response to the RFU’s representations to the Regulation 18 Plan, LBRuT has confirmed that Policy 18 would not preclude appropriate development at Twickenham Stadium, and Policy 26 (Visitor Economy) is supportive of proposals which support and enhance existing visitor attractions which would include Twickenham Stadium. This clarification is welcomed.

Policy 26 (Visitor Economy)

As drafted in the Regulation 18 Local Plan, Policy 26 did not reference Twickenham Stadium or its significant role in LBRuT’s visitor economy, as a nationally (and indeed internationally) significant sporting venue, and its secondary but essential revenue-generating use as an entertainment venue. The emerging policy does not appear to recognize the critical role Twickenham Stadium plays in adding to the viability and vitality of Twickenham town centre either, and should be addressed.

In Regulation 18 Local Plan representations, the RFU requested that the Stadium is added to the existing attractions that the Borough will support, promote and enhance. We suggested that Part A of this Policy (p.220) is updated as follows (amendments in red/strikethrough).

A. The Council will support the sustainable growth of the visitor economy for the benefit of the local area by:

- 1. supporting proposals which promote and enhance the borough's existing tourist attractions, including the unique, historic and cultural assets that are connected via the River Thames, such as The Royal Botanic Gardens, Kew, Ham House and Hampton Court Palace;*
- 2. proposals that lead to increased visitors and tourists need to be of an appropriate scale for the size of the centre and will be assessed against the transport policies of this Plan;*

3. requiring accommodation and facilities to be accessible to all; either 10% of hotel bedrooms should be wheelchair accessible or 15% of new bedrooms to be accessible rooms as set out in London Plan Policy E10;

4. enhancing the environment in areas leading to, within and around visitor destinations where appropriate;

5. supporting the Cultural Quarters in Richmond and Twickenham and other existing clusters of cultural facilities and creative industries, particularly in town centres, and where ancillary facilities are proposed that are open for public use (such as restaurants, gyms and conference facilities);

6. supporting appropriate development at Twickenham Stadium which complements the use of the site as an internationally significant sports and entertainment venue.

Within the Council's Statement of Consultation (June 2023), in response, the importance of Twickenham Stadium to the Borough was accepted and recognised by the Council. It was confirmed the list is not exhaustive and would encompass Twickenham Stadium. This is acknowledged and the clarification is welcomed, however, the RFU maintain that given the scale and international significance of the Stadium, a specific reference to it should be included within the policy text.

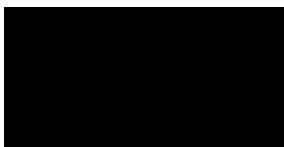
Summary

The RFU support the prospect of working in partnership with the Council to develop a Masterplan for the Twickenham Stadium site and its long-term development. To this end, these representations provide comments and suggestions with respect to the current drafting of the allocation and relevant other emerging policies.

This detailed letter has been provided to response to Part C of the Detailed Response Form. It covers the following draft policies/strategies: Policy 1; Policy 18; Policy 26; Place Based Strategy 8; and, Site Allocation 13.

We look forward to further engaging with LBRuT through the plan-making process and through development of a masterplan in response to the Site Allocation. If you have any questions, please don't hesitate to contact me.

Yours faithfully



Paul Landsberg | Director
CBRE Ltd | UK Development - Planning

cc. Mr Mark Lynch – RFU; Ian Crockford – RFU

Appendix 1 -

Extract from MOL Land Review
(2021) p.115-117

Parcel: Kneller Chase Bridge

Number: 36 **Area (ha):** 18.69 **Place:** Whitton & Heathfield



Legend

 MOL General Area

Parcel map



View facing north from B361 along the southern boundary, with views of open lawn and housing.



View facing north east from the southern boundary, with views into private gardens from the public highway of The Avenue.



View facing north from B361 along the southern boundary, with views of Kneller Hall grounds including open lawn, trees along boundaries and associated structures in the background.

Boundary Assessment

London Plan Boundary Criterion: ‘Clearly, using physical features that are readily recognisable and likely to be permanent’

The western part of the parcel is bound by development on an Army Barracks. The western part of the parcel to the north is bound by regular backs of residential properties along Amberside Close, tennis courts. The Duke of Cambridge Close bounds the western part of the parcel to the east, Spray Lane bounds the westernmost part of the eastern part of the parcel. The Duke of Northumberland River bounds the parcel to the east with Whitton Dene and regular backs of residential properties bounding the eastern part of the parcel to the north along Queensbridge Park.

Assessment of parcel against London Plan MOL criteria

MOL assessment summary

	Criterion 1	Criterion 2	Criterion 3	Criterion 4	Overall Rating
MOL Parcel score	3	2	2	3	3

* Mostly inaccessible land and therefore assessment based on aerial photography and views from public highways.

London Plan MOL Criterion 1: ‘Contributes to the physical structure of London by being clearly distinguishable from the built-up area’

Built development is notable within the eastern of the parcel which contains Chase Bridge Primary School and hard standing to the east of the Duke of Northumberland River associated with Twickenham Stadium. Elsewhere a small number of minor buildings provide minimal urban influences.

Boundaries are mixed. A continuous tree line along northern and southern boundaries screen adjacent development well. The eastern edge is dominated by hard standing, with no identifiable boundary features and has open views of the directly adjacent Twickenham Stadium, resulting in no sense of openness. To the west the parcel is bound by multiple buildings with little screening, providing localised urbanising influences. Housing central but outside of the parcel (Duke of Cambridge Road), is has a mainly continuous tree line/ woodland on all sides, likely to screen the development on other areas of the parcel.

Open flat lawn with mature trees/ woodland along boundaries defines most of the parcel, with topographic change only at the Duke of Northumberland's River, therefore landscape structure is fairly weak. As built development is generally absent across most of the parcel, which is a fairly large open space contributing to separating the urban areas of Twickenham to the east and Whitton/ Hounslow to the west, it contributes to structure of London and therefore the parcel scores moderate (3) for criterion 1.

London Plan MOL Criterion 2: ‘Includes open-air facilities, especially for leisure, recreation, sport, the arts and cultural activities, which serve either the whole or significant parts of London’

The parcel provides school grounds for recreation and playing fields for local sports. The parcel also provides army barrack grounds and some playing facilities were visible based on views from a public highway. The path along the Duke of Northumberland's River provides the only publicly accessible part of the parcel, offering informal recreation. As the parcel provides local recreational and sport facilities, it scores weak-moderate (2) for criterion 2.

London Plan MOL Criterion 3: ‘Contains features or landscapes (historic, recreational, biodiversity) of either national or metropolitan value’

The river section of the parcel is designated as a SINC (borough) and OSNI including a valued green corridor at the Duke of Northumberland's River. It contains a small part of the signposted Duke's River Walk, a local recreational route. The western section lies within an Archaeological Priority Area. As the parcel has local historic, biodiversity and recreational value, it scores weak-moderate (2) for criterion 3.

London Plan MOL Criterion 4: 'Forms part of a strategic corridor, node or link in the network of green infrastructure and meets one of the above criteria'

The parcel meets criterion 1. The fairly large green space and the Duke of Northumberland river corridor contribute to an important local wildlife corridor. It offers good connectivity north to south through two PRowS, including the signposted Duke's River Walk along the river, however the rest of the parcel is private therefore overall it has fragmented accessibility. Hard standing east of the river associated with Twickenham Station is likely to provide no wildlife value. As the parcel has fragmented access for people and is likely to provide a small contribution to a wildlife corridor along a local river, it scores moderate (3) for criterion 4.

Conclusion

Overall comment

Overall the parcel fulfils its role for MOL purposes, meeting criteria 1 and 4. However, the eastern edge of the parcel is developed and does not meet the MOL criteria.

Strategy and Recommendations

	Conserve	Enhance	Restore	Review	
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The eastern edge of the parcel, hard standing associated with Twickenham Stadium, meets none of the MOL criteria and it is recommended that its MOL status is considered further.

Appendix 2 -
Photographs showing how
eastern strip of MOL is used on
Match Days & Location map

View 1A



View 2A





View 3A



View 4A



View 5A



View 6A



View 7A

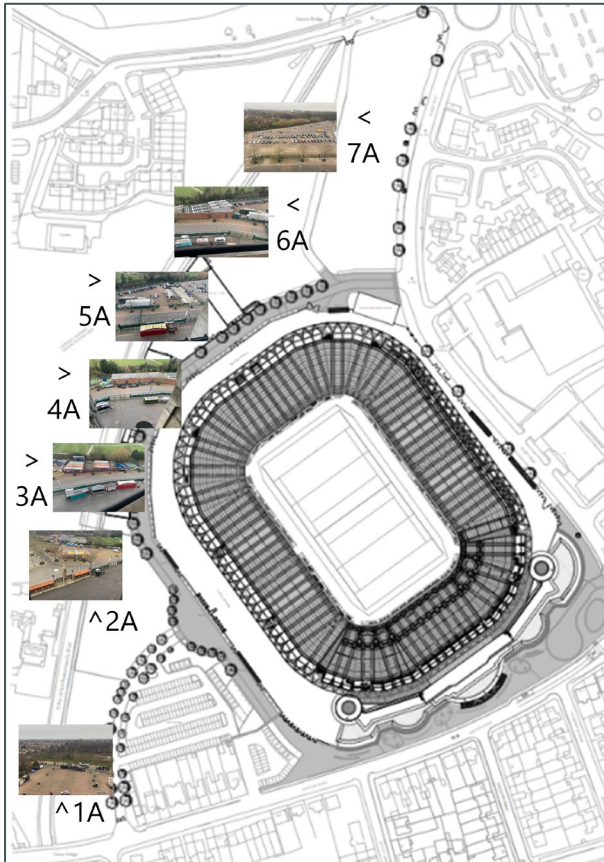


Photo location map (left) and MOL boundary (right)