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Our ref: GAO/SNE/LHA/U0024101

Your ref: Draft Local Plan (Regulation 19) Consultation

24 July 2023

Dear Sir/Madam

**London Borough of Richmond upon Thames (LBRuT) - Draft Local Plan (Regulation 19) Consultation
St Mary's University Representations**

We write on behalf of our client, St Mary's University ('St Mary's'), to make representations on the London Borough of Richmond upon Thames ('LBRuT') Draft Local Plan (Regulation 19) which is out for consultation until 24 July 2023.

Background to St Mary's

Founded in 1850 by the Catholic Poor Schools Committee, St Mary's University which was formerly a high education college, became a university in 2014. The University's main campus is located in Strawberry Hill, as well as a campus at Teddington Lock, a short walking distance from the main campus, which promotes sports facilities as well as teaching spaces in the existing pavilion building.

St Mary's offers a highly rated teacher training programme and range of courses to students, including sport and health degrees. The University is internationally renowned for sport and offers a wide range of sport science degrees including physiology, rehabilitation and physiotherapy, sport psychology, nutrition, coaching science and conditioning.

The vision (Vision 2030) of the University is to build around creating a transformational experience for students, and staff as the staff support them to succeed. The five pillars include: achieving student success, developing people, extending impact through growth, expanding reach through partnerships and enhancing sense of place. St Mary's University, Twickenham has climbed 16 places to sit in its highest ever position in The Times and The Sunday Times Good University Guide 2023.

Draft Site Allocation 10: St Mary's University, Strawberry Hill

St Mary's submitted representations to the Regulation 18 Consultation on 28 January 2022 in respect of Draft Site Allocation 10 which relates to their main campus in Strawberry Hill. They wish to reiterate and expand on these previous comments as part of the Regulation 19 Consultation.

St Mary's welcome the inclusion of their main campus and the support for future growth in respect of upgrading and enhancing teaching, sport and student accommodation.

They would like to highlight that the red line boundary shown on page 65 of the Draft Local Plan is not correct. There is a section of land to the rear of 11 Waldegrave Park which is owned by St Mary's excluded from the red line which is currently leased to Newland House School. Please refer to the appended site ownership plan to this covering letter. The request is for this land to be incorporated into the draft site allocation boundary.

In respect of draft Site Allocation 10, St Mary's would like to suggest the following addition to the third bullet point of the draft Site Allocation, in respect of the MOL designation on the main campus:

*"It is acknowledged that this is a constrained site, with the majority of land not built on designated as MOL. Future development should protect and enhance the character and openness of the designated open land, including views and vistas. **However, further educational and/or sport facilities proposed within the MOL designation may be considered acceptable, subject to an appropriate very special circumstances case being provided.** There are also listed buildings, BTMs proximity to conservation areas and also sports fields. Any development proposal should protect and, where possible, enhance the highly significant heritage assets and respect the special and unique location and setting of St Mary's University, including the Grade I Listed Chapel, adjoining Grade I listed building Strawberry Hill House and the associated Historic Park and Garden (II*) as well as the high quality Edwardian villas within the Waldegrave Park Conservation Area, having regard to the design objectives set out in the relevant character area profiles in the Urban Design Study and Village Planning Guidance SPD "[amendments in **bold**]."*

The draft Site Allocation focuses on the main campus and while there is reference to Teddington Lock campus, this is in relation to a Masterplan and/or site development brief (SPD). St Mary's would like the opportunity for their Teddington Lock campus to be considered for its own site allocation, or further emphasis provided in the current draft site allocation for the University, in recognition of the projected future enhancement of the overall campus.

The Teddington Lock campus, acquired in 1999 (approx.15 acres) is located 1.3miles from the Main Campus and benefits from an All Weather Pitch (AWP) and 5 pitches; two football pitches, a training pitch, a rugby pitch and a mini ruby pitch. There are also two cricket pitches. A car park serves the campus, accessed via Broom Road. There is one pavilion to the north west with changing and toilet facilities, a smaller pavilion to the south used a store, and a two storey building to the east of the site which offers changing rooms and facilities at ground floor and teaching rooms and staff/student rooms at first floor. The educational use of the site has been present for over 10 years and is established. For ease of reference, a Site Plan of the Teddington Lock Campus is appended to this letter.

The Teddington Lock Campus currently suffers from outdated buildings which are no longer fit for purpose to meet the modern needs and expectations of staff and students of the University. Furthermore, the buildings, and the Site itself, suffer from poor accessibility which reduces access for staff and students with mobility difficulties. As a result, the teaching spaces and wider Site are not desirable and have become underused. There is an opportunity to utilise this additional campus and enhance the teaching spaces and sport facilities on offer in support for the current and future demand for University places, for example, for the University's Sport and Exercise programmes. Furthermore, the changing and showering facilities are inadequate and as a result the use of these, by the students, clubs and local community who utilise the outdoor pitches is limited. Furthermore, the outdoors pitches are in need of upgrade and improvement.

The vision for this campus is to enhance the indoor and outdoor sport and recreational use and associated ancillary educational facilities through re-development of the site including the redevelopment of existing building, and provision of artificial sports surfaces to improve the facilities offered to students and staff of the University and also to maintain and improve partnerships with the local community.

While it would be preferable for the Teddington Lock campus to have its own site allocation, should this not be possible, St Mary's deem it would be beneficial for greater acknowledgement of the opportunity of improvement, upgrade and enhancement of the sport and educational facilities at the Teddington Lock campus through greater clarification in draft Site Allocation 10. We would suggest that bullet point number 2 of the draft Site Allocation, is amended to read as follows:

*"The existing playing fields and sports facilities **at the Strawberry Hill campus and Teddington Lock campus** should be retained and/or re-provided, **to meet modern educational and sports requirements of the University and support future demand**, and if necessary, replacement facilities will have to be provided off site. Any reprovision of facilities should be equal or better standard than existing."*
[amendments in **bold**].

In addition, we would suggest that the Teddington Lock campus site plan is included alongside the site plan for the main campus, in the Site Allocation for greater clarity.

We note the comments submitted on the Regulation 18 Consultation from various parties including the National Trust, Historic England and CPRE on the Draft Site Allocation 10. St Mary's believe that the Council's approach taken to the wording included within the Site Allocation in respect of development on the main campus allows for a fair assessment of forthcoming proposals to be considered on a case by case basis. However, we are seeking greater clarity on the Teddington Lock campus, as outlined above.

Draft Sports Policy

St Mary's are supportive of the wording included in the Draft Policy 37 'Public Open Space, Play, Sport and Recreation' in respect of the improving and enhancing existing sports facilities and the future growth and development of the University so have no comments they wish to make.

Draft Metropolitan Open Land (MOL) Policy

Draft Policy 35 'Green Belt, Metropolitan Open Land and Local Green Space' refers to *"appropriate uses within the Green Belt or Metropolitan Open Land include public and private open spaces and playing fields, outdoor recreation and sport..."*.

This policy acknowledges that there are forms of appropriate uses within the MOL. The Teddington Lock campus is largely covered by an MOL designation, which includes the outdoor sports pitches but excludes the two storey education and sports facility building to the east. Outdoor recreation and sport is an appropriate use, however the policy and supporting text is silent on facilities associated, and ancillary, to outdoor recreation and sport. St Mary's would support further clarity around this point in the policy and supporting text and believe it would be beneficial in respect of a clearer understanding of the parameters for future growth and the enhancement of the facilities on both the Teddington Lock campus and also the main Strawberry Hill campus.

We suggest that the Draft Policy 35 wording is amended as below:

*“...appropriate uses within the Green Belt or Metropolitan Open Land include public and private open spaces and playing fields, outdoor recreation and sport **(and associated ancillary sport and teaching facilities)**...”[amendments in **bold**].*

Local Housing Need Assessment (LHNA) 2021

St Mary’s previously commented on the Local Housing Needs Assessment 2021 (LHNA) as part of the Regulation 18 Consultation and wish to reiterate these comments as part of these representations. The 2023 LHNA update, following the Regulation 18 consultation and the release of the 2021 Census information did not include the suggested amendments. St Mary’s are in support of the position moving forward in respect of student residential accommodation, however there are two points they wish to highlight below.

- Paragraph 8.74 - since the discussions with Iceni, St Mary’s have undertaken further work on their projections. The figure of ‘893’ quoted in relation to an on-site capacity increase accounting for demolition, should be ‘950’.
- Paragraph 8.85 - with regard to the statement *“Overall, the current and future needs of the student population within LBRuT are currently being met. There is therefore no requirement to increase the overall housing need on the basis of student growth...”*. It should be made clear that the statement will not apply if the predicted growth in residential provision cannot be contained within existing landholdings with the support of the Council.

We trust that the above representations will be considered as part of the Regulation 19 Consultation. If it would be helpful to discuss the content of these representations further with St Mary’s University and Gerald Eve, please do contact Graham Oliver (0787 940 8511), Sam Neal (0776 813 1779) or Lucy Hale (0747 166 4280) of this office who would be happy to discuss.

Yours faithfully

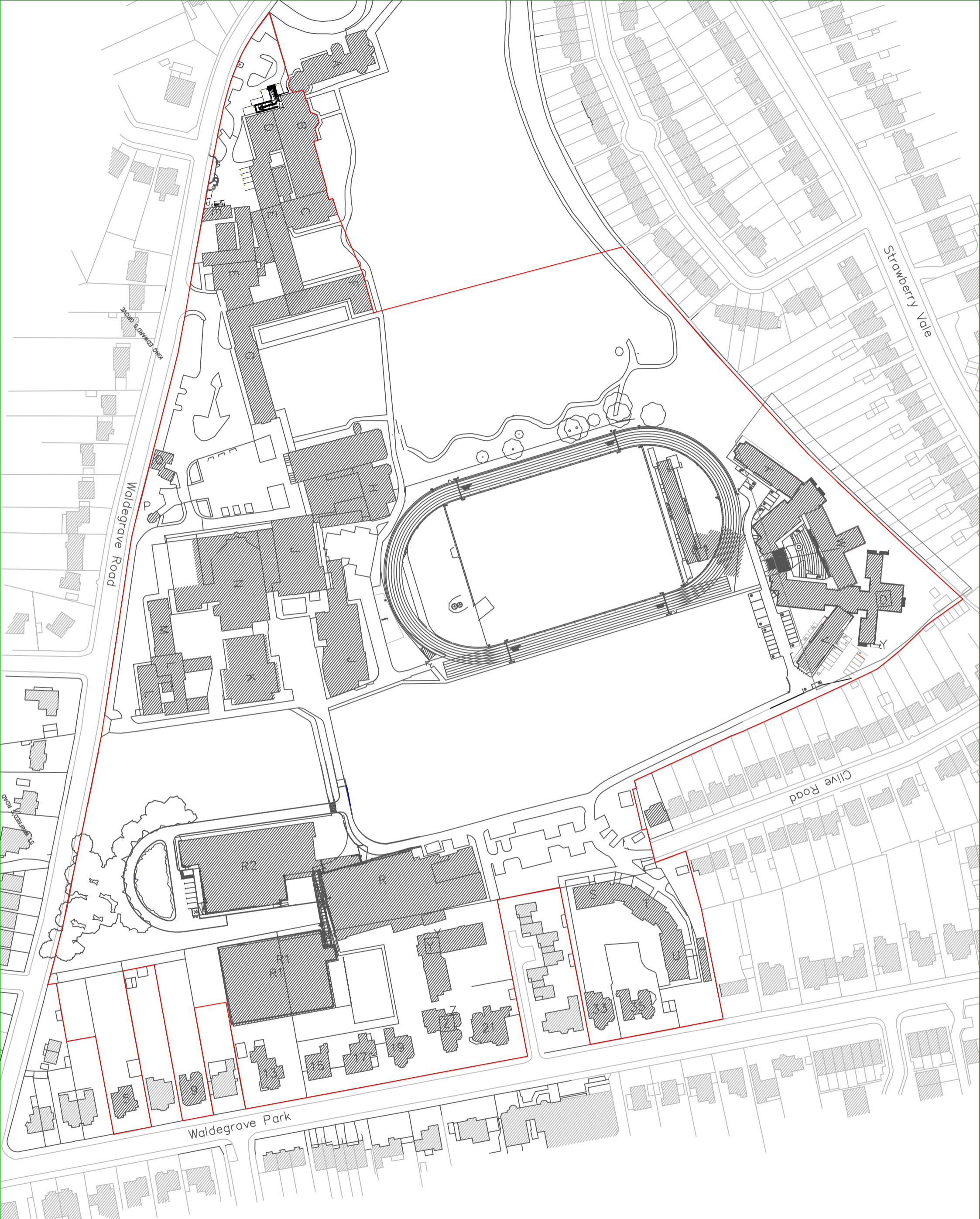


Gerald Eve LLP

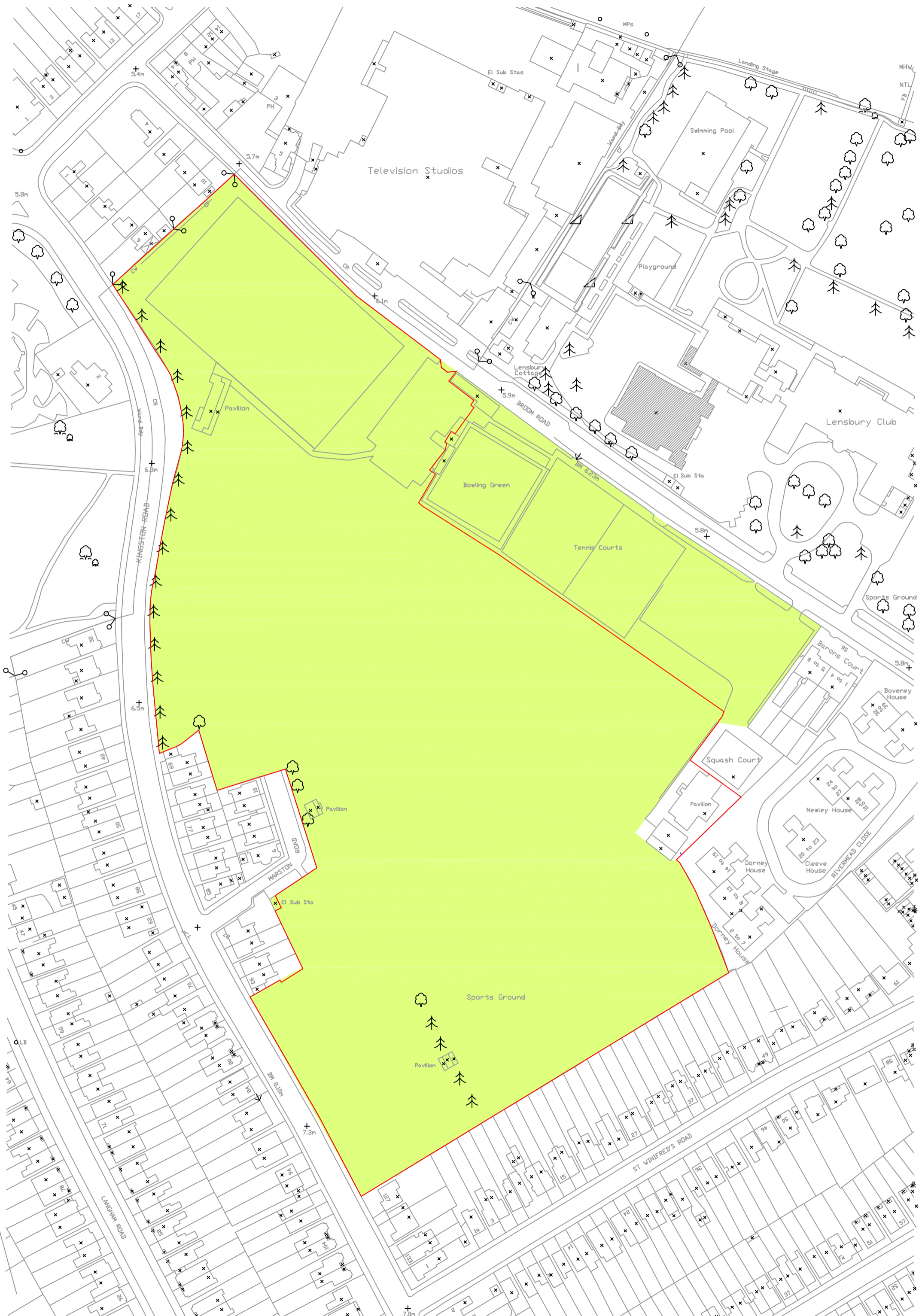
Encl.

Appendix 1: St Mary’s Main Campus Site Ownership Plan

Appendix 2: Teddington Lock Campus Site Ownership Plan



ST MARY'S UNIVERSITY- MAIN CAMPUS OWNERSHIP PLAN





Local Plan Publication Consultation

From 9 June 2023 to 24 July 2023

RESPONSE FORM

The Council is inviting comments on the Publication version of the Local Plan.

The Local Plan sets out a 15-year strategic vision, objectives and the spatial strategy. The draft Plan includes place-based strategies covering the whole borough, along with accompanying site allocations, as well as the thematic planning policies that will guide future development in the borough. It will inform how growth will be accommodated across the borough. The draft Plan seeks to address future challenges including climate change, health, affordability and liveability.

This consultation is the final opportunity to comment on the Local Plan before it is submitted to the Secretary of State for independent 'examination in public'. At this stage in the plan-making process, in accordance with the national guidance, consultation responses should focus on whether the Local Plan has been developed in compliance with the relevant legal and procedural requirements, including the duty to cooperate, and with the 'soundness' of the Plan. Further detail on these concepts is provided in the accompanying guidance notes available on the website (via the link below).

How to respond

Please read the consultation documents and other background information made available on the Local Plan website: www.richmond.gov.uk/draft_local_plan_publication_version

You can respond by completing this form, either electronically using Word or as a print out, and sending it to the Council by:

- Email to LocalPlan@richmond.gov.uk
- Post a hard copy of the form to Spatial Planning and Design, LB Richmond upon Thames, Civic Centre, 44 York Street, Twickenham, TW1 3BZ.

Alternatively, you can make comments on the draft Local Plan **online via our Consultation Portal**, which is accessible at the website listed above.

All responses must be received by 11:59pm on Monday 24 July 2023. The consultation is open to everyone; however please note that responses will not be treated as confidential and those submitted anonymously will not be accepted.

This form has two parts:

- Part A – Personal details and about you
- Part B – Your detailed response(s).

Part A: Personal Details		
	1. Personal Details *	2. Agent's Details (if applicable)
Title	Mr	Mr
First name	Gavin	Graham
Last name	Hindley	Oliver
Job title (where relevant)		Partner
Organisation (where relevant)	St Mary's University	Gerald Eve LLP
Address		████████████████████ ██████
Postcode		██████
Telephone		
E-mail address		████████████████████

*If an agent is appointed, please complete only the title, name and organisation boxes but complete the full contact details of the agent.

Data protection

The Council is committed to ensuring that personal data is processed in line with the General Data Protection Regulation (GDPR) data protection principles including keeping data secure.

The Council's Privacy Notice is published on the webpage www.richmond.gov.uk/data_protection

All responses will be held by the London Borough of Richmond upon Thames. Responses will not be treated as confidential and will be published on our website and in any subsequent statements; however, personal details like address, phone number or email address will be removed.

If you submit comments, the consultation responses and your personal data will be passed to the Planning Inspectorate and a Programme Officer. The Programme Officer manages the procedural and administrative aspects of the examination. The Programme Officer will contact you using the personal information you have provided if you have indicated in the response form your wish to engage in the Examination.

Part B: Your Response

3. To which part(s) of the draft Local Plan does your response relate to?

Please indicate the documents **and** the specific paragraph numbers, policy or site allocation numbers and names, maps or tables you are commenting on.

Documents		Sections	
Publication Local Plan (including changes to the Policies Map designations)	<input checked="" type="checkbox"/>	Page number(s)	Pages 65 - 67, 290 - 297, 299- 301
		Paragraph number(s)	
		Policy no./name	Policy 35 'Green Belt, Metropolitan Open Land and Local Green Space' and Policy 37 'Public Open Space, Play, Sport and Recreation'
		Place-based strategy	
		Site Allocation(s) no./ name	Site Allocation 10 'St Mary's University, Strawberry Hill'
		Maps	Site Allocation 10, page 65
		Tables	
Sustainability Appraisal Report	<input type="checkbox"/>	Page number(s)	
		Paragraph number(s)	
Other (for example an omission or alternative approach)	<input checked="" type="checkbox"/>	The Local Housing Needs Assessment 2021 - paragraph 8.74 and 8.85. Please refer to supporting covering letter.	

4. Do you consider the Local Plan is:

4.1 Legally compliant	Yes <input type="checkbox"/>	No <input type="checkbox"/>
4.2 Sound	Yes <input type="checkbox"/>	No <input type="checkbox"/>
4.3 Complies with the Duty to Co-operate	Yes <input type="checkbox"/>	No <input type="checkbox"/>

Further information on these terms is included within the accompanying guidance note, which can be found on the website at www.richmond.gov.uk/draft_local_plan_publication_version

If you have entered 'No' to 4.2, please continue with Q5. Otherwise, please go to Q6.

5. Do you consider the Local Plan is unsound because it is not:

5.1 Positively Prepared

5.2 Justified

5.3 Effective

5.4 Consistent with national policy

6. Please give details of why you consider the Local Plan is or is not legally compliant, unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to provide comments in support of the legal compliance and/or soundness of the Local Plan, or its compliance with the duty to co-operate, please use this box to set out your comments.

Please note your response should provide succinctly all the information, evidence and supporting information necessary to support / justify the response. After this stage, further submission will only be at the request of the Inspector, based on the matters and issues they identify for examination.

The representations submitted do not seek to address whether the Draft local Plan is legally compliant, sound or complies with the duty to co-operate. The proposed amendments and comments seek greater clarity to support the future growth and demand of the University. Please refer to supporting covering letter which sets out further details.

Please continue on a separate sheet / expand box if necessary.

7. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, when considering any legal compliance or soundness matter you have identified at 6 above.

Please note that non-compliance with the duty to co-operate is incapable of modification at examination.

You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please note your response should provide succinctly all the information, evidence and supporting information necessary to support / justify the suggested change. After this stage, further submission will only be at the request of the Inspector, based on the matters and issues they identify for examination.

Please refer to supporting covering letter in relation to suggested modifications. We welcome the opportunity to discuss the suggested modifications to the Draft Local Plan with the Council.

Please continue on a separate sheet / expand box if necessary.

8. Do you consider it necessary to participate in examination hearing session(s)? (Please tick box as appropriate)

No, I do not wish to participate
In hearing session(s)

Yes, I wish to participate
In hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

9. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

We welcome the opportunity to participate in the hearing session(s) to discuss the amendments to the draft Site Allocation 10 in respect of St Mary's University Campus.

Please continue on a separate sheet / expand box if necessary.

10. If you are not on our consultation database and you respond to this consultation, your details will be added to the database. This allows us to contact you with updates on the progression of the Local Plan and other planning policy documents.

If you do not wish to be added to our database or you would like your details to be removed, then please tick this box.

Signature:

Graham Oliver

Date:

24 July 2023

For electronic responses a typed signature is acceptable.