
Former ICL Private Ground, Teddington: Townscape and Visual Impact Assessment

Prepared on behalf of Quantum Group

September 2017

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1.0 INTRODUCTION

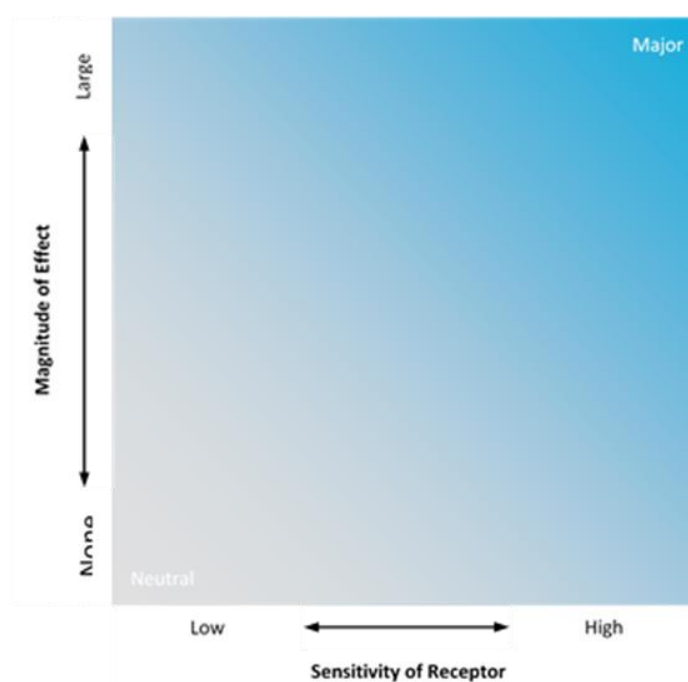
- 1.1 Barton Willmore Landscape Planning and Design (BWLPD) were commissioned by Quantum Group to undertake a Townscape and Visual Impact Assessment ('TVIA') of the former Imperial College London Private Ground, Teddington ('the Site').
- 1.2 The Proposed Development will see the former Imperial College London Private Ground on Udney Park Road, Teddington, London, TW11 9BB, regenerated for a mixed-use development that will deliver high-quality sports and community facilities, alongside new public open space, affordable care led accommodation for Older People and a new GP surgery. This triple approach secures a sustainable, inclusive future for the Site, the benefits of which underpin national and local planning policy.
- 1.3 With the creation of the Teddington Community Sports Ground Community Interest Company, three areas will be established :
- i) Assisted living, extra care, residential development and new GP surgery;
 - ii) Open parkland with community Orchard and outdoor gym; and
 - iii) Community sports facilities.
- 1.4 The proposed community sports facilities will comprise of the following:
- A full-size Third Generation artificial grass pitch (3G AGP);
 - Natural grass playing pitch provision;
 - Tennis Courts / MUGA; and
 - Community pavilion containing changing rooms, kitchen, bar and server, flexible-use community rooms and crèche.
- 1.5 **Figure 1: Site Context Plan** demonstrates that the Site is bordered by a close knit urban grain; however the Site is in private ownership and there is no public access across the Site.
- 1.6 The Site is covered by the London Borough of Richmond Upon Thames (LBRuT) Open Space Assessment Report (April 2015) and LBRuT Playing Pitch Strategy (August 2015), both of which stated the Site is 'under used' and 'not in use'. This is pertinent to the fact that the south-west part of the Site and the townscape to the south of the Site are designated an 'Area Poorly Provided with Public Open Space' and covered by Policy: DM OS 6 of the Development Management Plan (DMP). The DMP requires new larger new developments to include open space provision, balancing between private, semi-private and public open space provision.
- 1.7 **Figure 1: Site Context Plan** also demonstrates that the Site is designated as 'Other Open Land of Townscape Importance' (OOLoTI). This designation does not preclude development,

providing it is linked to the functional use of the OOLoTI and that it does not harm the existing character and openness of the open land. Additionally, improvements and enhancements to the openness and character of other open land and measures to open up views, where appropriate, are encouraged.

- 1.8 LBRuT Design Quality SPG (adopted 2006) guides and promote the highest quality of design, by focusing on the general principles of design quality as well as the need for a character and context appraisal to be carried out, such that new development is grounded in what is special about a place and that there is an understanding between the Site and the street.
- 1.9 The TVIA has therefore been undertaken to identify a detailed understanding of the Site and the existing surrounding townscape character, so as to inform the iterative design process and opportunities for enhancements, to respond positively to the Design Quality SPG, and ensure that the Proposed Development is successfully integrated into the townscape, as well as responding positively to LBRuTs identified open space future needs and demands, given the Site's history of being substantially underutilised.

2.0 TVIA METHODOLOGY

- 2.1 With reference to **Appendix 1: Townscape and Visual Impact Assessment Methodology**, the TVIA methodology has been drawn from the Guidelines for Landscape and Visual Impact Assessment, Third Edition, 2013 (GLVIA 3).
- 2.2 The two fundamental considerations in the TVIA are the sensitivity of townscape character areas, townscape features and visual receptors and the magnitude of effect that these receptors are likely to experience as a result of the Proposed Development during its construction and operational phases.
- 2.3 The sensitivity of a receptor is established through the consideration of their combined townscape value and susceptibility and the sensitivity is categorised as either High, Medium or Low.
- 2.4 The magnitude of effect is informed through judgements on the size and extent of change resulting from the Proposed Development and is categorised as either Large, Medium, Small, Very Small or None.
- 2.5 The consideration of the relationship between the sensitivity of the receptor and the magnitude of effect results in an effect, ranging between Major to Negligible (adverse or beneficial). Where no change is identified, this is assessed as a Neutral effect.
- 2.6 The following effects diagram illustrates the typical relationship between the sensitivity and magnitude of effect and the resulting potential effects.



3.0 SITE CONTEXT

3.1 A review of the surrounding townscape and associated inter-visibility has been undertaken to inform the iterative design process and identify a study area proportionate for the assessment of the likely effects resulting from the Proposed Development during construction and operation.

3.2 **Figure 1: Site Context Plan** demonstrates that the Site is located within Teddington, in the LBRuT. The Site is broadly trapezoid in form, with the exception of its south-west edge and a 10x10m indent on the southern edge, relating to the Thames Lea tunnel. The Site covers 12.8 acres. The Site is bordered by residential development on:

- Fullerton Court (to the north);
- Kingston Lane (to the east);
- Cromwell Road (to the south); and
- Udney Park Road (to the west).

3.3 Teddington High Street is 160m to the north of the Site, beyond which there is a continuous settlement pattern extending to Twickenham. The Site is part of a townscape which consist of a mixture of Victorian, Edwardian, post 1950s and contemporary buildings.

3.4 Ham and Kingston are on the opposite side of the River Thames, along with Richmond Park, 2.3km to the east of the Site.

3.5 To the south of the Site, Teddington's residential settlement pattern extends to border the walled grounds of Bushy Park, 375m to the south of the Site. Hampton Court is to the south of Bushy Park and adjacent to the River Thames, 2.25km to the south of the Site.

3.6 To the west of the Site, Teddington's settlement pattern continues towards Hampton Hill, with Fulwell Park and Golf Course forming a notable break in the settlement pattern, 1.9km to the north-west of the Site.

Topography and Hydrology

3.7 As demonstrated by **Figure 2: Topographical Features Plan**, the River Thames meanders to the south, east and north of the Site, and at its closest point is 560m to the north-east of the Site. The Site is therefore within the plains of the River Thames and situated across flat landform, between 5 - 15m Above Ordnance Datum (AOD).

- 3.8 The landform remains consistently flat adjacent to both sides of the River Thames, before rising across Hampton Hill (15-25m AOD), to the west of the Site, and Sawyer's Hill to the north-east of the Site (50-55m AOD).
- 3.9 Other waterbodies within the area include Longford River to the west of the Site which flows through Bushy Park (with a number of large ponds) to the River Thames and the Long Water, a 1km long rectangular water body within Hampton Court.

Vegetation

- 3.10 **Figure 1: Site Context Plan** demonstrates that to the north and east of the Site there are small scale tree groups within small pocket parks and adjacent to the River Thames. On the south side of the River Thames, the extent of vegetation increases considerably across Ham, Ham Common and Richmond Deer Park.
- 3.11 There are extensive formal avenues of trees within Bushey Park, to the south of the Site, along with more informal woodland clumps and plantations, all of which form part of the parkland setting. Similarly, there is a formal arrangement to the gardens within Hampton Court along with veteran and mature trees.
- 3.12 The residential streets surrounding the Site are of varying species, which in combination with the residential gardens and pocket parks provide a well vegetated character to the area overall.
- 3.13 An Arboricultural Survey (by Barrell Tree Consultancy) has been undertaken as part of the Planning Application and should be read in conjunction with the TVIA for details on the trees bordering the Site. All of the trees along Kingston Lane and 2 trees on the western edge of the Site, are covered by Tree Preservation Orders, as illustrated on **Figure 3: Site Appraisal Plan**.

Land Use and Infrastructure

- 3.14 The Site is located within a residential townscape of Victorian, Edwardian, post 1950s and contemporary properties, in varying arrangements of single dwellings, semi-detached, terraced and large scale apartments, all of which form a close knit urban grain.
- 3.15 This residential pattern is interspersed with small scale pocket parks, including Udney Hall Gardens (140m to the north-east of the Site) and Langdon Park (590m to the south-east of the Site). There are large scale sports pitches within St. Mary's University Lock Grounds, 200m to the north-east of the Site.

- 3.16 There are various retail usages within Teddington High Street; educational facilities include Collis Primary School, 100m to the south of the Site and Teddington School, 820m to the south-east of the Site.
- 3.17 The road networks within this settlement pattern are predominantly single lane in either direction, as a result of the close knit urban grain, and often with on street parking, as exemplified by the roads bordering the Site.
- 3.18 Teddington rail station is 300m to the west of the Site.

Public Rights of Way (PRoW)

- 3.19 **Figure 1: Site Context Plan** demonstrates that there are no PRoW immediately surrounding the Site and that the Site is not crossed by any PRoW. Access to the Site is restricted as it is in private ownership.
- 3.20 The Thames Path (a national trail) extends along the south bank of the River Thames, 620m to the east of the Site at its nearest point.
- 3.21 Cobblers Walk crosses west / east through Bush Park, to the south-west of the Site, along with a number of designated cycle routes. Similarly, there are numerous PRoW and cycle routes across Ham, Ham Common and Richmond Deer Park, including the London Loop (a national trail).

Cultural Heritage

- 3.22 Historically the River Thames was wider than its current alignment and the landscape comprised marshland and swamps around Richmond, before being drained in the middle ages to enable agriculture. Teddington Lock, to the south-east of the Site, was constructed in 1810-12 and marks the tidal limit of the River.
- 3.23 At the turn of the C19th the Site was part of the Robert Fullerton Udney estate and consisted of fields bordered by a small number of properties. By the 1920s the Udney estate had been developed, with the Site becoming playing fields as part of the Merchant Taylor School.
- 3.24 Throughout the C20th the Site was private playing fields, as part of St Mary's Hospital Medical School and later Imperial College London (ICL). ICL retained the private sports usage until 2015 with the Site renamed as the ICL Teddington Sports Ground.
- 3.25 Refer to the Heritage Assessment for a detailed analysis of the Site and the likely Heritage effects of the Proposed Development.

Designations

- 3.26 **Figure 1: Site Context Plan** demonstrates that the Site is not covered by any national landscape designations. The Site is not part of a Conservation Area (CA), nor does it contain any Listed Buildings.
- 3.27 The south-west part of the Site is within an 'Area Poorly Provided with Public Open Space'.
- 3.28 The closest Conservation Area is Teddington High Street to the north of the Site, which reflects the main concentration of Listed Buildings in proximity to the Site.
- 3.29 Richmond Deer Park, Bushy Park and Hampton Court are Registered Park and Gardens, with Hampton Court also a Scheduled Monument.
- 3.30 There is Metropolitan Green Belt to the south-west of the Site within Hampton, adjacent to the River Thames.
- 3.31 At a Borough Level the Site is allocated as 'Other Open Land of Townscape Importance' in Policy DM 03 of the Development Management Plan (adopted 2011). This Policy is outlined in detail in **Appendix 2** and within the subsequent chapters of the TVIA.
- 3.32 Also at a Borough Level, the following buildings are designated as 'Buildings of Townscape Merit', the locations of which are illustrated on **Figure 3: Site Appraisal Plan**.
- nos. 75 and 77 Kingston Lane to the east of the Site; and
 - nos. 36 and 38 Udney Park Road to the west of the Site.

Tranquillity

- 3.33 With reference to the Campaign to Protect Rural England's on-line tranquillity mapping for Inner and Outer London, the Site is covered by an area defined as 'least tranquil', i.e. the lowest tier of rating.

4.0 POLICY SUMMARY

- 4.1 The policies relevant to the Site and the Proposed Development are outlined in full in **Appendix 2: Planning Policy** and summarised below.

National Planning Policy Framework (NPPF), 2012

- 4.2 The environmental role of achieving sustainable development outlines the need to contribute positively to protecting and enhancing the natural, built and historic environment, including helping to improve biodiversity.
- 4.3 NPPF Paragraph 12 states the Core Planning Principles, including for taking account of the different roles and characters of areas; re-using land that has previously been developed and promoting mixed use developments, such that there would be multiple benefits from the use of land in urban areas.
- 4.4 NPPF Section 7: Requiring Good Design addresses the response to local character and establishing a strong sense of place, such that development adds to the overall quality of an area.
- 4.5 NPPF Section 11: Conserving and Enhancing the Natural Environment focusses on enhancing the natural and local environment, with paragraph 114 identifying the need to plan positively for the creation, protection and enhancement of biodiversity networks and green infrastructure.
- 4.6 NPPF paragraph 77 sets out criteria for Local Green Space designations, with NPPF paragraph 78 stating policy for managing development within a Local Green Space should be consistent with policy for Green Belts.

London Plan

- 4.7 The London Plan provides the overall strategic plan for London. Policies include for promoting biodiversity and green infrastructure; urban greening (i.e. new planting and green roofs), and design having regard to local character with architecture making a positive contribution.

Richmond upon Thames Local Plan

Core Strategy (adopted 2009)

- 4.8 The Core Strategy sets out the Strategic Planning Framework for the Borough, and to guide the future development of the Borough.

4.9 The Local Development Framework Vision states in relation to the Borough's responsibility towards global sustainability that:

"...Open land will be protected; biodiversity will be maintained and enhanced..."

4.10 The Core Strategy Objectives with regards to 'Protecting Local Character' include:

"Retaining and improving open space and parks to provide a high quality environment and to balance between areas for quiet enjoyment and wildlife and areas to be used for sports and games, in accordance with the Richmond Borough Open Spaces Strategy 2005." (page 33)

4.11 The public open space hierarchy defines spaces between 2-20ha as 'Local park' for which the function is:

"To provide children's play, court games and nature conservation;

Limiting playing field provision..." (page 92)

4.12 In relation to Open Space and Biodiversity the Evidence Base summary states:

"Local biodiversity is important and there continues to be the need for this to be maintained in the face of the pressure of both built development and recreation. Priority habitats are acid grassland and ancient parkland. Some areas are deficient in open space and have less access to areas of nature conservation importance; these include...parts of Teddington."

4.13 Relevant policies are:

- Policy CP 1: Sustainable Development;
- Policy CP 4: Biodiversity;
- Policy CP 7: Maintaining and Improving the Local Environment; and
- Policy CP 10: Open Land and Parks.

Development Management Plan (adopted November 2011)

4.14 The Site is covered by Policy DM OS 3: Other Open Land of Townscape Importance, which states:

"Other open areas that are of townscape importance will be protected and enhanced in open use."

It will be recognised that there may be exceptional cases where appropriate development is acceptable. The following criteria

must be taken into account when assessing appropriate development:

1. It must be linked to the functional use of the Other Open Land of Townscape Importance; or

2. It can only be a replacement or minor extension of existing built facilities;

3. In addition to 1. or 2., it does not harm the character and openness of the open land.

Improvement and enhancement of the openness and character of other open land and measures to open up views into and out of designated other open land will be encouraged where appropriate.

When considering developments on sites outside designated other open land, any possible visual impacts on the character and openness of the designated other open land will be taken into account."

4.15 The supporting policy text notes that:

"OOLTI should be predominantly open or natural in character. The following criteria are taken into account in defining OOLTI:

Contribution to the local character and/or street scene, by virtue of its size, position and quality;

Value to local people for its presence and openness;

Immediate or longer views into and out of the site, including from surrounding properties; and

Value for biodiversity and nature conservation.

Note that the criteria are qualitative and not all need to be met.

The purpose of this policy is to safeguard this open land and ensure that it is not lost to other uses without good cause. Protecting and opening up views into and out of designated other open land is encouraged because of the contribution to the distinctive character of an area and the benefits to all. Where a comprehensive approach to redevelopment can be taken, such as on major schemes or regeneration proposals, or for social community or educational uses, it may be acceptable to re-distribute the open land within the site, providing that the new open area is equivalent or improved in terms of size, shape, location, quality and potential ecological value."

- 4.16 The south-west edge of the Site is part of a larger tract of an 'Area Poorly Provided with Public Open Space' with Policy DM OS 6 stating:

"Public Open Space will be protected and enhanced. Improvement of the openness and character of the Public Open Space including measures to allow for convenient access for all residents will be encouraged where appropriate.

New Public Open Space with convenient access for all will be provided where possible, or existing areas made more accessible, particularly in areas poorly provided with public open space. These will be linked to the wider network of open spaces. Financial contributions will be required for most new developments towards the provision of, or improvements to public open space.

Larger new developments will be expected to include open space provision within the scheme, with the aim to strike a balance between private, semi-private and public open space provision."

- 4.17 Other relevant policies included in **Appendix 2** are:

- Policy DM SD 1: Sustainable Construction;
- Policy DM SD 4: Adapting to Higher Temperatures and Need for Cooling;
- Policy DM SD 5: Living Roofs;
- Policy DM OS 5: Biodiversity and new development;
- Policy DM OS 8: Sport and Recreation Facilities;
- Policy DM OS 9: Floodlighting;
- Policy DM HD 3: Buildings of Townscape Merit;
- Policy DM HD 7: Views and Vistas;
- Policy DM DC 1: Design Quality;
- Policy DM DC 2: Layout and Design of Mixed Use Scheme; and
- Policy DM HO 2: Infill Development.

Local Plan Publication version for consultation (4th January - 15th February 2017)

- 4.18 The Site is proposed as a Local Green Space, referred to as 'Udney Park Playing Fields'. Draft Policy LP13: Green Belt, Metropolitan Open Land and Local Green Space states the criteria to be taken into account when defining Local Green Space is:

- ***"The site is submitted by the local community;***
- ***There is no current planning permission which once implemented would undermine the merit of a Local Green Space designation;***
- ***The site is not land allocated for development within the Local Plan;***

- ***The site is local in character and is not an extensive tract of land;***
- ***Where the site is publicly accessible, it is within walking distance of the community; OR where the site is not publicly accessible, it is within reasonably close proximity to the community it serves;***
- ***The Local Green Space is demonstrably special to a local community and holds a particular local significance, for example, because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife;***
- ***The Local Green Space designation would provide protection additional to any existing protective policies, and its special characteristics could not be protected through any other reasonable and more adequate means."***

4.19 Other relevant proposed policies are:

- LP 1: Local Character and Design Quality;
- LP 2: Building Heights;
- LP 5: Views and Vistas;
- LP 9: Floodlighting;
- LP 12: Green Infrastructure;
- LP 14: Other Open Land of Townscape Importance;
- LP 15: Biodiversity;
- LP 16: Trees, Woodlands and Landscape; and
- LP 17: Green Roofs and Walls.

Teddington Village Plan (on-line)

4.20 The Vision for Teddington is stated as:

"The vision for Teddington is that it will continue to be a welcoming community for residents, visitors and business. The thriving and safe district centre will provide a wide range of independent and other shops, employment, leisure, cultural, health and social facilities.

Teddington will support a range of community activities, and will continue to enjoy good public transport connections. The role of the town centre and needs of the community are supported. Residential areas will continue to enjoy and use amenities such as Teddington's green spaces, the historic Royal Parks and the River Thames."

4.21 From the survey of residents, the highest aspect which made Teddington a good place to live was 'local parks and open spaces' at 78% of the survey responses.

Supplementary Planning Documents

Supplementary Planning Document - London Borough of Richmond Supplementary Planning Document: Design Quality (adopted February 2006)

4.22 The relevant aspects are summarised in the following TVIA chapter.

Buildings of Townscape Merit (adopted 22 May 2015)

4.23 This identifies buildings and structures which due to their historical associations, architectural style and visual interest, as well as possibly their siting within an area, area of significance to the history and character of the environment.

4.24 The following buildings are included:

- Two buildings, nos. 75 and 77 Kingston Lane to the east of the Site; and
- Two buildings, nos. 36 and 38 Udney Park Road to the west of the Site.

Design Guidelines Trees: Landscape Design, Planting & Care

4.25 This provides guidance on tree planting as well as selective list of tree species. This design guidance has been referred to as part of the iterative process for the Site.

London Borough of Richmond Upon Thames Open Space Assessment Report, April 2015

4.26 The Site is included as Imperial College (Teddington Sports Ground) and assessed as 'under-used'.

4.27 The Assessment Report provides detail with regard to what provision of open space exists in the Borough, as well as its condition, distribution and overall quality. The report also considers the demand for provision based on population distribution, planned growth and consultation findings. The Strategy (to follow the Assessment Reports) will give direction on the future provision of accessible, high quality, sustainable provision for open spaces, sport and recreation in the LBRuT.

London Borough of Richmond Upon Thames Playing Pitch Strategy, August 2015

4.28 This Strategy provides a strategic framework for the maintenance and improvement of existing outdoor sports pitches and ancillary facilities between 2015 and 2020, replacing the Sport, Open Space and Recreation Study (2008).

- 4.29 The Strategy notes that the Site is not in use and concludes objectives of 'protect, enhance' for cricket; 'protect, provide and enhance' for football and 'protect, provide and enhance' for rugby.

5.0 LANDSCAPE AND TOWNSCAPE CHARACTER

Published Studies

- 5.1 The Site is covered by a number of published landscape/townscape studies which provide descriptive analysis of the landscape/townscape as well as guidelines for managing future change. The relevant studies are summarised below with the full publications included in **Appendix 3**, with the relevant areas illustrated on **Figure 4: Published Landscape / Townscape Character Plan**.

National

Natural England National Character Area 115: Thames Valley (NCA 115), 2012

- 5.2 NCA 115 is characterised as a mainly low-lying, wedge-shaped area, widening from Reading to London and unified by the River Thames. The landscape is a very diverse pattern of urban and suburban settlements, with associated infrastructure, commons, woodlands and historic parks.

- 5.3 The key characteristics relevant to the townscape surrounding the Site are:

- *"Flat and low-lying land, rising to low, river-terraced hills...;*
- *The river is closely associated with numerous historic places and cultural events, such as the signing of Magna Carta at Runnymede. Tourists from all over the world are drawn to the rich heritage of the area, flocking to attractions like Hampton Court Palace and Windsor Castle; and*
- *The area is important for recreation, both for residents and visitors. Historic parkland and commons provide access to green space, the Thames Path National Trail runs the length of the NCA, and a variety of activities are enjoyed on the river and other waterbodies."*

- 5.4 The fact that the Site does not provide public access and enable recreation for residents positions it contrary to one of the key characteristics of the NCA.

- 5.5 The Statements of Environmental Opportunity (SEO) for NCA 115 relevant to the Site and the Proposed Development are:

- *"Plan for the enhancement of the area's rivers, and the expansion of their operational flood plains and associated wetland habitats, aiding the regulation of water flow, improving water quality, benefiting biodiversity, and reinforcing cultural heritage and landscape (SEO 1);*
- *Maintain existing greenspace and plan for the creation of green infrastructure associated with the significant projected growth of urban areas, to reduce the impact of*

development, to help reduce flooding issues, and to strengthen access and recreation opportunities. Seek links from urban areas to wider recreation assets such as the Thames Path National Trail, National Cycle Routes, and the river and canal network, and promote the incorporation of best practice environmental measures into any new development (SEO 3); and

- *... increase woodland for carbon sequestration, noise and pollution reduction, woodfuel and protection from soil erosion, while also enhancing biodiversity, sense of place and history SEO 4."*

Borough

London Borough of Richmond Supplementary Planning Document: Design Quality (adopted 2006)

- 5.6 This SPD is intended to guide and promote the highest quality of design, by focusing on the general principles of design quality.
- 5.7 The section on 'Urban Form & Character Areas' identifies that the environmental character of the Borough since the 19th century has resulted in a group of urbanised areas, connecting former villages which are interspersed with open space.
- 5.8 With reference to **Figure 4: Published Landscape / Townscape Character Plan**, the Site is on the southern edge of the Strawberry Hill and Teddington East Character Area, and immediately adjoins the Hampton Wick and South Teddington Character Area (note these areas are annotated as Hampton Hill and South Teddington on SPD Figure 6).

Strawberry Hill and Teddington East Character Area

- 5.9 This character area is elongated in form, extending northwards from Cromwell Road with the Site covering 2.5% of the Strawberry Hill and Teddington East character area.
- 5.10 The Strawberry Hill and Teddington East Character Area is described as:

"A suburban character area less tightly developed than Twickenham with small pockets of open space and large gardens with a significant number of trees. Teddington High Street retains a mix of attractive Victorian and Edwardian shopping parades (some with original shop fronts) and Artisan Cottages in small side streets. Strawberry Hill House and grounds exhibits an exuberant Gothic style. The Strawberry Hill residential area is leafy and contains a mix of large older home and twentieth century infill houses and flats."

Hampton Wick and South Teddington

- 5.11 The Hampton Wick and South Teddington character area, to the south of the Site and Cromwell Road, is described as:

"The old village centre of Hampton Wick has a strong village character through uniform building styles and narrow winding streets. South of the railway line development is mostly Georgian, Victorian and Edwardian and small in scale with a tree lined backdrop relating to Hampton Court Park. North of the railway line there is more variation in style and age of residential development. Houses to Lower Teddington Road and the River are more substantial in scale and there are a number of modern residential apartment blocks."

Hampton Hill and Teddington West Character Area

- 5.12 The Hampton Hill and Teddington West Character Area, to the west of the Site and adjoining residential properties on the west side of Udney Park Road, is described as:

"Hampton Hill High Street maintains its village character, composed of Victorian shops (converted from cottages), some listed houses, a picturesque backdrop of trees from Bushy Park and a pleasant arrangement of neighbouring residential streets. Most of the area is residential with a predominantly Victorian and Edwardian character of uniform semi-detached homes in avenues of mature trees. There are also many pockets of modern designed terraced housing and flats arranged in courts and parklands with a high standard of landscape quality."

- 5.13 This SPD outlines the need to understand the functions of a place as well as the connections and spaces between buildings, highlighting:

- Character;
- Continuity and Enclosure;
- Public Realm;
- Ease of Movement;
- Legibility;
- Adaptability; and
- Diversity.

- 5.14 SPD chapter 2 outlines the need for a character and context appraisal to be carried out, such that new development is grounded in what is special about a place and that there is an understanding between the Site and the street.

- 5.15 Key themes for Townscape are:

"Building forms, local vernacular and heritage, enclosure, views and landmarks."

5.16 Townscape considerations are:

- ***"What are the local building forms in terms of scale, form, height, massing and layout?"***
- ***What is the local vernacular - detailing, fenestration, materials, texture and colour?"***
- ***What is the sense of enclosure and-gaps and frontages;"***
- ***What is the character of the local roofscape - how will the proposal affect the local or Borough wide skyline?;"***
- ***How can development make the most of views into or out of the site;"***
- ***How do local buildings deal with changes in level; and***
- ***Are there any landmarks and how does the site relate to them?"***

Local Character Areas defined by Field Work

5.17 To provide a finer level of detail on the townscape character surrounding the Site, (given the large extent of the SPD character areas relative to the smaller scale of the Site), and to address the townscape questions raised within the Design Quality SPD, a local townscape character assessment has been undertaken via field work.

5.18 With reference to **Figure 5: Local Townscape Character Plan** the field work has identified the following 20 townscape character areas (TCA) which are outlined in full in **Appendix 4**.

- TCA 1: Waldegrave Road;
- TCA 2: Elmfield Grove;
- TCA 3: Teddington Pool;
- TCA 4: Teddington High Street;
- TCA 5: St. Marys;
- TCA 6: Teddington Riverside;
- TCA 7: St. Marys University Campus;
- TCA 8: Kingston and Langham;
- TCA 9: St. Marks Estate;
- TCA 10: Udney Park;
- TCA 11: Gomer Gardens;
- TCA 12: Clarence Road;
- TCA 13: North Fairfax;
- TCA 14: Collis School;
- TCA 15: South Fairfax;
- TCA 16: St. Winifreds;

- TCA 17: Langdon Park;
- TCA 18: Langdon Place;
- TCA 19: Harrowdene Gardens; and
- TCA 20: Bushy Park.

- 5.19 In summary, the Site is situated within a varied townscape, such that whilst there is a prevailing pattern of 2 to 3 storey residential properties, they are interspersed with larger scale buildings and small scale parks. The scale and mass of the residential properties are often extended by the fact they have large scale pitched roofs, or have introduced dormer or skylight windows into the roofscape.
- 5.20 The larger scale buildings are often located at junctions or interchanges along the High Street (the Harlequin or the former Church of St. Mary), within residential streetscapes (Cambridge House or the Langdon Building), adjacent to the River Thames (Regatta House), or associated with recreational grounds (The Lensbury Building).
- 5.21 The facades of these larger scale building are mainly brick or render, with either extensive fenestration or symmetrically aligned windows across the façade with detailing around window frames or at the corner of buildings via quoining. The roof profiles of these larger scale buildings are also varied, including both flat and pitched roof lines, and overall the upper storeys step back from the main façades either as a result of the pitched or mansard roof lines.
- 5.22 Where larger buildings are located within landscaped or recreational settings, they have an asymmetrical relationship with their landscaped grounds.

TCA 10: Udney Park

- 5.23 The Site is within TCA 10: Udney Park which covers part of Kingston Lane, Cromwell Road, Udney Park Road and playing fields in private use (the Site). This area forms its own townscape character area due to the enclosed physical and visual relationship between the built form and the playing fields, compared to the wider townscape pattern of built form located adjacent to the street pattern rather than around a private space.
- 5.24 TCA 10 reflects the wider townscape pattern of a mixture of residential properties with a uniform scale of 2 and 3 storey Victorian or Edwardian properties interspersed with larger scale massing via Fullerton Court (4 storeys) and long building plots with terraced properties as exemplified by nos. 28-32 Udney Park Road.
- 5.25 Kingston Lane forms the eastern edge of TCA 10 and is the narrowest of the road networks, with residential properties and pavement only on the eastern side of the road. There are also a lower number of street trees compared to Cromwell Road and Udney Park Road, but similarly

to these roads, Kingston Lane is lit. The built form is a consistent pattern of 2 storey Victorian and Edwardian semi-detached and detached properties with pitched roofs, predominantly constructed of brick and with off-street parking. Detailing within these properties is limited to around windows or balconies, with ridge levels between +17.98m AOD and +20.20m AOD. At the northern end of TCA 10 there is larger scale massing with the post war Victoria Court at 3 storeys in height, which is notably of a lower aesthetic façade treatment than the surrounding properties.

- 5.26 Cromwell Road forms the southern part of TCA 10 and is wider than Kingston Lane with pavements on both sides of the road, as well as a higher number of street trees. The properties on the eastern end of Cromwell Road are post war, with a mixture of light brick or cream render and between 2 to 4 storeys in height, with ridge levels at +17.24m AOD. Those at the western end of Cromwell Road, within TCA 10, are 4 storeys in height with basements and first floor access via steps. Facades are a mix of pale or red brick with white window surrounds and occasional balconies. The properties are off-set from Cromwell Road, to enable off-street parking. Cromwell Road is also lit.
- 5.27 Udney Park Road forms the western part of TCA 10 and consists of properties on both sides of the road, as well as pavements or grassed edges and street trees. The exception to this is the east side of the road, as there are no properties to the north and south of the clubhouse, where the road sits immediately adjacent to the ICL Grounds. It is this area where the grass verge has become an ad hoc footway. At the northern end of Udney Park Road (within TCA 10) there are 3 storey Victorian properties off-set from the road, similarly to enable off-street parking, and either with brick or cream facades. In the central part of Udney Park Road are terraced properties (nos.28-32), equating to 3 storeys as a result of their lower ground levels and occupied mansard roofs, extending in plot sizes up to 60m in horizontal length and to ridge levels of +18.43m AOD.
- 5.28 Fullerton Court at the northern end of TCA has a plot width of 55m and is 3 storeys with a large pitched roof, equating to 4 storeys (ridge level of +21.32 AOD). The red brick façade is punctuated by a symmetrical arrangement of fenestration, although there is no articulation to break up the overall massing of the building, except for white banding along the eaves.
- 5.29 Within the playing fields (the Site) there is a clubhouse, consisting of a 2 storey brick property with a large pitched roof (equating to 3 storeys and with a ridge level of +18.11 AOD) bordered by a low hedge. The built form steps down in scale to 1 storey on the eastern side (+14.98m AOD), along with a covered brick colonnade adjacent to the former playing fields.
- 5.30 There is a more enclosed character to Udney Pak Road and Kingston Lane compared to Cromwell Road, as a result of the increased vegetated character and narrower road widths.

Parts of the former playing fields are also partially screened from Kingston Lane by existing vegetation bordering the Site or from Udney Park Road by the club house.

- 5.31 In relation to the Design Quality SPD, TCA 10: Udney Park is considered to reflect the stated 'Mixed Context':

"In mixed streets where there is greater variety in character, contextual design cues will be more diverse. This may present the opportunity for a more original approach which follows key components where harmony exists, such as the building line or established building height, but introduces a more distinctive composition."

6.0 SITE APPRAISAL

- 6.1 **Figure 3: Site Appraisal Plan** demonstrates that the Site consists of playing fields with a hard surfaced tennis court in the south-west corner and a clubhouse on the western edge. The playing fields are demarcated primarily for football, with a rugby pitch and all-weather cricket wicket.
- 6.2 The Site is broadly trapezoid in form, stepping in at the south-west edge in relation to the boundaries of properties on Cromwell and Udney Park Road. There is also a small indent on the southern edge in relation to the Thames Lea tunnel, equating to 10mx10m. The northern edge of the Site is linear in form, relating to the boundary with Fullerton Court and residential properties on Kingston Lane.
- 6.3 The landform across the Site is flat overall and the vegetation is a mixture of shrubs and trees located along the edges of the Site and around the club house, which includes a mature kerb side hedge.
- 6.4 The clubhouse is a brick 2 storey building with a large pitched roof, equating to 3 storeys, with two symmetrically aligned single storey transepts with large pitched roof (equating to 2 storeys) on its eastern façade. These transepts connect a single storey brick colonnade.
- 6.5 **Site Appraisal Photograph A** is taken from the north-west edge of the Site, adjacent to Fullerton Court, and demonstrates the inter-visibility between this building and the Site as a result of its proximity and scale and limited vegetation, such that the boundary treatments consist primarily of fencing. The image also demonstrates the varying boundary treatments along the eastern edge of the Site, with metal rail fencing, shrubs and ivy clad trees extending for 42m of the boundary and largely filtering views from Kingston Lane and Virginia House, with the exception of upper storey windows from these properties.
- 6.6 Continuing along the eastern boundary, the metal rail fence changes to a timber palisade fence which extends for 180m of the boundary (with a 28m section of metal rail railings) before reverting back to metal rail fencing, which continues around the south-east edge of the Site, as demonstrated by **Figure 3: Site Appraisal Plan**. This stretch of metal rail fencing is heavily clad with ivy, effectively screening views from ground level, akin to the timber fence. The mature trees along this edge of the Site also filter views from second floor windows of properties opposite the Site, albeit to varying degrees. The variety of fencing and the over grown condition of the shrubs results in an unkempt character and reduces the permeability and views into the Site.

- 6.7 **Site Appraisal Photograph B** is taken from the eastern edge of the Site and reiterates the above boundary treatments and varying inter-visibility between Fullerton Court and residential properties adjacent to Kingston Lane. The image also demonstrates the varying boundary features adjacent to Cromwell Road, with alternating metal rail fencing and timber palisade fencing, such that views from ground floor level remain largely filtered or screened by the combination of the solid fencing or existing vegetation.
- 6.8 In contrast to the eastern edge of the Site, there are no trees within the Site's southern boundary, with the trees being located in the pavement to the immediate south of the Site. As a result of the formal spacing of street trees along Cromwell Road there is inter-visibility from the 2nd and 3rd floor windows of properties on the southern side of Cromwell Road into the Site, as demonstrated by **Site Appraisal Photograph C**.
- 6.9 **Site Appraisal Photograph B** also demonstrates the inter-visibility between properties on the east side of Udney Park Road and the north side of Cromwell Road, due to their scale and proximity to the Site. These properties however screen views of the Site in relation to residents on the western side of Udney Park Road.
- 6.10 For the terraced properties along Udney Park Road, their elevated position also enables inter-visibility from 2nd and 3rd storeys, except for where directly opposite the pavilion, which truncate views across the remainder of the Site. There are also views into the Site from these properties as a result of the metal rail fencing, in contrast to the timber fencing which screens views from basement levels and the adjacent bungalow to the Site.
- 6.11 **Site Appraisal Photograph D** demonstrates the small scale works area on the western edge of the Site which consists of a single storey shed and is bordered by timber fencing and hedging.
- 6.12 From the above the Site contains the following landscape / townscape features:
- A clubhouse;
 - Grass sports pitches in private use;
 - Hard surface tennis courts;
 - Metal rail fencing;
 - Timber palisade fencing;
 - Mature trees; and
 - Shrubs and hedges.

Ecological Summary

- 6.13 With reference to Lindsay Carrington Ecology Services' Phase 1 Ecology Report (March 2016), the majority of the Site comprises amenity grassland. Species recorded include dominant creeping bent (*Agrostis stolonifera*), locally dominant green alkanet (*Pentaglottis sempervirens*) and locally abundant yarrow (*Achillea millefolium*).
- 6.14 No species are present within the tennis courts or areas of concrete. An area of colonised hardstanding is present along the western boundary of the Site, species here include locally dominant green alkanet, frequent common mouse-ear (*Cerastium fontanum*), and dove's-foot cranes-bill (*Geranium columbinum*).
- 6.15 The hedgerow along the northern boundary of the colonised hardstanding, includes dominant privet (*Ligustrum* sp.), locally frequent leyland cypress (*Cupressus x leylandii*), frequent ivy (*Hedera helix*) and rare dandelion (*Taraxacum* agg.).
- 6.16 The hedgerow along the western boundary of the Site includes locally abundant ivy and locally frequent comfrey (*Symphytum officinale*).
- 6.17 The hedgerow along the southern boundary of the Site contains numerous gaps. Species here include locally abundant beech (*Fagus sylvatica*) and frequent oak (*Quercus robur*) and ivy.
- 6.18 The hedgerows are considered as UK Biodiversity Action Plan habitat though do not qualify as 'important' under the Hedgerow Regulation 1997 due to the lack of species richness. The hedgerows provide nesting habitat for birds.
- 6.19 In terms of other wildlife there are no protected species living on Site, no reptiles were recorded during the reptile surveys and all the other main ones have been scoped out. The Site does seem to be well used by bats at a local and possibly a district/county level as at least seven different species were recorded (out of 15 species that breed in the country as a whole) including a *nathusius pipistrelle*.

Arboricultural Summary

- 6.20 With reference to Barrell Tree Consultancy's (BTC) Arboricultural Constraints Report the trees bordering:
- the north-west edge of the Site, between Fullerton Court and the existing pavilion are Category B and C and include oak and maple species up to 15m in height;
 - the pavilion are Category B and C and include lime trees up to 10m in height;
 - the south-west part of the Site are Category B and C and include maple, lime, birch and lawson cypress up to 14m in height;

- Cromwell Road are Category B and C trees and include lime, ash and cherry up to 15m in height;
- Kingston Lane are Category B, C and U trees and include lime, oak, poplar and cherry up to 18m in height.

6.21 The hedges on the Site boundary include a beech hedge 4m high on the southern edge of the Site, adjacent to Cromwell Road.

6.22 A large portion of the trees around the Site which are Category C is due to them being of a small habit or in poor condition;

6.23 Tree 69 and groups G71 and G74 are in decline and have very poor future prospects and several trees along Udney Park Road and Cromwell Road have been regularly pollarded so their crown volume is much smaller than would be expected.

6.24 BTC have made previous representations (16050-TPOObjection-MW, 13th April 2017) to the LPA with regards to the group of trees shown as G1, as they do not easily identify with the TPO and are in varying condition, such that they were not considered to merit being designated as a TPO, concluding:

"the proposed TPO does not conform with either the Secretary of State's advice of the guidance issued by the Council itself. It is my advice that the proposed TPO as drafted cannot be confirmed. Furthermore, I do not consider that the Council has offered sufficient evidence to justify the inclusion of any of the trees within a TPO."

7.0 THE SITE'S CONTRIBUTION TO OOLTI AND SENSITIVITY

7.1 As set out in the TVIA methodology, the TVIA process ascertains the sensitivity of the Site through an analysis of its townscape value and susceptibility. As part of this an analysis the Site's contribution to the OOLTI designation has been undertaken.

Other Open Land of Townscape Importance (OOLTI)

7.2 As noted, the Site is currently designated as 'Other Open Land of Townscape Importance' as defined by Policy DM OS 3 of the adopted LBRuT Local Plan, and this policy is retained in the emerging Publication Version London Borough of Richmond Upon Thames Local Plan, as Policy LP 14: Other Open Land of Townscape Importance.

7.3 This policy provides protection for the spatial character of the townscape of the borough and a requirement for it to be enhanced in open use.

7.4 The Site is considered to have a townscape value in relation to its OOLTI requirements of:

"Contribution to the local character and/or street scene, by virtue of its size, position and quality; and

Value to local people for its presence and openness."

7.5 Whilst the Site evidently has a spatial relationship with the surrounding road networks and forms part of the localised townscape character, which are appropriate for the designation, the Site is not in public use. The varying condition of the existing trees and overgrown shrubs and hedges along the boundaries (in addition to the varying boundary fencing) also demonstrates that the vegetation has not been positively managed or enhanced in past years and that the LPA have not sought to address this, given their TPO status.

7.6 The Site does also not form part of any OOLTI 'longer views' due to the close proximity of surrounding properties which curtail any longer distance views; nor is it considered to be noted for its biodiversity or nature conservation value, another OOLTI criteria.

7.7 The Site therefore does not comply with the full OOLTI criteria and in terms of value to local people for its presence, this is limited by it not being in public access. In terms of openness, the Site's land use does contrast with the surrounding built form, but any sense of openness is limited by the enclosure to the Site by the surrounding built form. There is also built form within the Site (the clubhouse) and existing hard surfacing and fencing, such that the Site already contains built features, such that it cannot be 'washed' over via the term 'open' and its degree of openness is therefore lessened.

Townscape Value

- 7.8 The football pitches and tennis courts appear to be in good condition, with the surfacing and surrounding chain link fencing intact, reflecting the findings of LBRuT Playing Pitch Assessment (2015).
- 7.9 Similarly the clubhouse appears to be in good condition. The boundary fencing is considered to be in fair to poor condition with some sections of the close boarded timber fence intact, whilst others are evidently damaged, or missing panels and heavily overgrown. The rugby pitches appear in poorer condition, reflecting the findings of LBRuT Playing Pitch Assessment (2015).
- 7.10 The Site does not have any scenic quality as it is playing fields and a tennis court; however it does present an evident contrast to the surrounding close knit residential built form and road networks reflecting the OOLTI designation of 'openness'.
- 7.11 As the Site is located in such close proximity to built form and road networks there is no sense of remoteness or tranquillity.
- 7.12 The playing fields and tennis courts are not rare or unusual landscape features, being engineered landforms and are therefore not 'natural' in character.
- 7.13 The trees within the Site are generally characteristic of the street trees within the surrounding townscape and considered by BTC's assessment to be generally in poor condition. The playing fields are not characteristic of the small scale open spaces including Udney Park, as there is no public access to them.
- 7.14 The Site is not publically accessible, therefore does not contribute to the recreational activity of the townscape.
- 7.15 The Site does not provide any cultural or historic association to the townscape.
- 7.16 The value of the Site is therefore not considered to be high because the Site is not covered by any national or landscape designations and the condition of the Site features is varied (i.e. it is not consistently in good condition), specifically the trees, for which a number are in poor condition. There is no scenic quality to the Site as views are of amenity grass, tennis courts, a club house and trees, all of which are common place features, all of which are seen in the immediate context of built form and vehicles. The Site features cannot be considered rare. The Site is in private use and therefore does not provide for recreational activities and similarly there is no cultural or heritage association to the Site given that the landform and land use are engineered for sport usage. As the Site is within an urban context, there are no perceptual qualities of remoteness or tranquillity and the permeability between the Site and the

surrounding road networks is reduced by the close boarded fencing and overgrown boundary vegetation in part.

- 7.17 As the Site is covered by the OOLTI designation and some of the trees are covered by a TPO, the Site's value is therefore at a borough level. Clearly, the Site forms a contrast with the surrounding built form as a result of its land use as noted above. The Site is therefore considered to have a medium value.

Townscape Susceptibility

- 7.18 As noted, the Site is an engineered landform to facilitate sports pitches and is flat overall. As a flat landform it has a greater capacity to accommodate change, as the likelihood for cut and fill operations is reduced, when compared with sloping landform.
- 7.19 The pattern of the Site is simple, being a trapezoid form, recreational land use and bordered by mature trees and metal rail fencing or timber fencing. In combination with the flat landform and the architectural style of the pavilion the Site is not considered to represent a complex townscape.
- 7.20 The composition of the Site is also simple, due to the recreational land use and that the pavilion is positioned asymmetrically within the Site, on its western edge.
- 7.21 Landcover is localised to boundary trees in contrast to the grassed areas. The trees would take a long time to re-establish if they were removed and therefore exhibit a high susceptibility. In contrast, the grass and hedgerows would re-establish in a much shorter time frame, and therefore their susceptibility is low.
- 7.22 The Site has a direct physical and visual relationship with Udney Park Road, Cromwell Road and Kingston Lane as it borders these road networks. However, its relationship in terms of usage and connectivity is negated by the fact the Site is in private ownership.
- 7.23 The susceptibility of the Site is therefore low, as a balance between the landform, vegetation patterns and pattern of the Site, whereby it is likely to be able to accommodate the Proposed Development with little effect upon its overall integrity.

The Site's Sensitivity

- 7.24 The Site's sensitivity is therefore assessed as medium, as a balance between a medium value and low susceptibility.

8.0 VISUAL APPRAISAL

- 8.1 Ascertaining the potential inter-visibility between the Site (assuming for the Proposed Development) and the surrounding townscape has been undertaken via field within the surrounding townscape with 23 Site Context Photographs (**SCP**) taken from within the surrounding area, as illustrated on **Figure 6: Visual Appraisal Plan**.
- 8.2 There is, in most visual appraisals, a continuum of degrees of visibility ranging from no view to open views of the Site. To indicate the degree of visibility of the Site, three categories of visibility have been used in this assessment:
- Open view: A view of a substantial proportion of the Site from within the wider landscape;
 - Partial view: A view of part of the Site or a filtered view of the Site, for example as a result of intervening barriers; and
 - No view: The Site is not visible as a result of intervening barriers, such as intervening landform, vegetation or built form.
- 8.3 The Site is not visible upon the western approach along Cromwell Road due to the road alignment and intervening built form (**SCP 1 and 2**), until one is immediately adjacent to the Site (**SCP 3**). From this location views across the Site truncated by the vegetated southern boundary fencing.
- 8.4 Continuing along Cromwell Road the playing fields are visible from the pavement when the boundary fencing changes from close boarded timber fencing to the metal rail fencing, and views extend across the Site to the large scale massing of Fullerton Court and terraced blocks on Udney Park Road (**SCP 4 and 5**). There are views across the playing fields from upper storey windows of properties along Cromwell Lane.
- 8.5 From the east of the Site, the intervening built form and road alignments screen the Site in views from the A310 (**SCP 6 and 7**). At the junction of the A310 with Kingston Lane there are very channelled and filtered views of the southern part of the Site as a result of the street trees (**SCP 8**), with the southern edge of the Site also visible at the junction with Addison Road (**SCP 9**).
- 8.6 At the junction of Cromwell Road and Kingston Lane there are channelled views across the Site to Fullerton Court, which in turn truncates any longer distance views beyond the Site (**SCP 10**).

- 8.7 The Site is not visible from Udney Hall Gardens due to the intervening built form (**SCP 11**), nor from Teddington High Street due to the curved alignment of Udney Park Road and Kingston Lane, in combination with the intervening built form (**SCP 12**).
- 8.8 From the northern part of Kingston Lane, the Site is visible from adjacent to Victoria House (SCP 13). However, as demonstrated by **SCP 13** there are mature trees on the north-east of the Site, such that the visibility of this part of the Site is reduced in close range views, as demonstrated by **SCP 14**.
- 8.9 **SCP 14** also demonstrates how the existing trees on the edge of the Site channel or partially screen views, such that there are not open views of the Site. This truncation of views from the roads, pavements and ground floor residential properties is reinforced by the close boarded fencing along Kingston Lane, as demonstrated by **SCP 15**. Where the boundary fencing alters to metal rail fencing there is greater permeability across the Site, as demonstrated by **SCP 16**.
- 8.10 From the northern approach along Udney Park Road the Site is screened by the large scale massing of Fullerton Court, until adjacent to the north-west part of the Site, when the limited boundary vegetation enables views across the Site to residential properties bordering Kingston Lane; albeit seen in the context of the larger scale pavilion.
- 8.11 The pavilion itself screens views of the remainder of the Site for when directly adjacent to it, as demonstrated by **SCP 18**. The sports pitches remain screened to the south of the pavilion as a result of the brick and timber boundary to the western part of the Site, as demonstrated by **SCP 19**. Within these views the Site is seen in the context of larger scale massing at Fullerton Court and the pavilion.
- 8.12 From the southern part of Udney Park Road the Site is screened by the intervening built form, as demonstrated by **SCP 19**.
- 8.13 The Site is not visible from within the wider townscape, such as the River Thames (**SCP 21**) or Bushy Park (**SCP 22**) due to the intervening built form, vegetation and flat landform.

Character of the Night Sky

- 8.14 As demonstrated by **Figure 7: Night Time Lighting Plan**, the clubhouse provides an existing light source within the Site, with internal lighting which omits glare and whilst the remainder of the Site is not lit, the Site is clearly set within a lit context which includes sports pitch lighting at St. Mary's University.
- 8.15 Cromwell Road, Udney Park Road and Kingston Lane are lit by lighting columns and there is lighting glare from within the surrounding residential properties.

8.16 With reference to the Institute of Lighting Professionals, the Site is considered to be within Environmental Zone 3: Suburban which is a suburban location, exemplified by the road networks, street lighting and Teddington High Street. The existing lighting environment is 'medium district darkness'.

Visual Summary

8.17 The visual envelope of the Site is very localised to the surrounding streets of Udney Park Road, Kingston Lane and Cromwell Road. There are also a number of channelled views from properties in the adjoining streets including Chadwick Close and the rear elevations of properties bordering the High Street to the north of the Site as well as channelled views from the approach to the Site along Kingston Lane from the A310.

8.18 There is a varied range of visibility from the surrounding road networks as a result of the varying extents of existing vegetation and the Site's existing boundary treatments.

8.19 When adjacent to the Site there are partial views across the Site from the northern part of Udney Park Road, with the Site seen in the context of the existing large scale massing of Fullerton Court and the clubhouse. The existing clubhouse and close boarded timber fencing also screen views of the remainder of the Site from adjacent locations on Udney Park Road for pedestrians and motorists.

8.20 From Cromwell Road, there are views across the Site as a result of the scale of the adjacent properties. These views are predominantly from 2nd floor stories and upwards as the intervening vegetation and close boarded timber fence truncate views at ground level.

8.21 When adjacent to the Site on Kingston Lane, the views of the Site are also screened by the close boarded fencing and existing vegetation, most notably at the northern part of Kingston Lane, when opposite Victoria Court for pedestrians. For residential receptors, views again are primarily from 2nd storey level.

8.22 The clubhouse is an existing light source within the Site; however overall the Site is not lit. There is lighting from the street lights along the surrounding road networks and the Site is clearly set within an existing lit context.

Richmond Borough Council Design Quality SPD

8.23 In relation to the Design Guide SPD 'Townscape Considerations' for TCA 10: Udney Park:

What are the local building forms in terms of scale, form, height, massing and layout?

- 8.24 Brick is the predominant material, exhibited across all building styles. There are a smaller number of properties rendered white or with split brick and rendered facades.
- 8.25 The terraced blocks along Udney Park Road extend for 66m to the north of Chadwick Close and 35m to the south of Chadwick Close. Fullerton Court extends for 55m and similarly Virginia House is also a 55m building plot.

What is the local vernacular - detailing, fenestration, materials, texture and colour?

- 8.26 In the northern part of the TCA 10, Fullerton Court is red brick with a darker red tiled roof. The fenestration arrangement is symmetrical with white window surrounds as well as a white band along the eaves.
- 8.27 In the eastern part of the TCA, Virginia House is red brick with a dark tiled 3rd storey. All windows are white and rectangular in form and there is no articulation or detailing to aid in breaking up the massing and scale of the built form.
- 8.28 Across the Edwardian properties adjacent to Kingston Lane the extent of fenestration is generally consistent with ground and upper storey windows. The extent of fenestration varies across the roof profiles, varying between dormer windows of skylight windows. Properties at the southern edge of the Kingston Lane have balconies.
- 8.29 Detailing is limited to localised areas around windows or balconies.

What is the sense of enclosure and-gaps and frontages?

- 8.30 Udney Park Road and Cromwell Road have off-street parking enabling a wider road and footway boundaries, along with street trees. Kingston Lane is predominantly on street parking and a narrower road width, with a footway only on the east side of the road and a lower number of street trees.
- 8.31 The street trees in combination with the trees bordering the sport pitches provide a sense of enclosure to the street pattern, which in combination with the fencing bordering the sport pitches partly encloses the street scape at ground level, reducing the perception of connectivity with the surrounding street networks bordering the sport pitches.
- 8.32 As demonstrated by the Site Appraisal Photographs, there is inter-visibility between the playing fields and the surrounding properties to varying degrees, as a result of differing types of boundary fencing and amounts of existing vegetation.

What is the character of the local roofscape - how will the proposal affect the local or Borough wide skyline?

- 8.33 Roof profiles are pitched along the norther, eastern and southern parts of the TCA, with the scale of Fullerton Court's roof adding an additional storey to the height of the built form.

How can development make the most of views into or out of the site?

- 8.34 The playing fields are only visible at close range from the surrounding road networks and any new built form will be visible to some degree, but seen in the context of existing properties. To make the most of views into the Site, the new built form should either be located primarily adjacent to the existing clubhouse to reflect the fact views from Udney Park Road already include the massing of the clubhouse, or in the northern part of the Site, where the existing boundary vegetation aids in truncating views, as well as any new built form being seen in the context of the existing large scale massing of Fullerton Court.
- 8.35 The removal of the close boarded fencing and management of the existing shrub and hedgerows will enable greater permeability between the Site and the surrounding townscape.

How do local buildings deal with changes in level?

- 8.36 Most properties are accessed at ground level; there are some at the western end of Cromwell Road and the central part of Udney Park Road where buildings are accessed at 1st storey, via external steps.
- 8.37 As the landform across the Site and the TCA in which the Site is located is flat overall, there is a consistent building height to the properties and similarly a generally consistent roof line.

Are there any landmarks and how does the site relate to them?

- 8.38 As demonstrated by **Figure 3: Site Appraisal Plan**, there are 2 Buildings of Merit opposite the Site, on Udney Park Road (nos. 26 and 36). These properties are not considered to be landmarks as they are situated within the existing street scape pattern and do not therefore 'stand out' or appear as distinctive. Their relationship to the Site is as per all other buildings Udney Park Road, Cromwell Road and Kingston Lane, whereby they are opposite the Site but direct physical and visual connections are limited as a result of extensive front garden vegetation and boundary treatments. The buildings are therefore not considered to have a direct relationship to the Site.

9.0 MITIGATION BY DESIGN RATIONALE

9.1 From the townscape and visual baseline it is considered that the Site provides the opportunity to enhance the local townscape through the provision of substantial new public open space and sports facilities in combination with extra care housing.

9.2 The Site is considered to provide this opportunity as the Site is:

- not covered by any national landscape designations;
- in part covered by an 'Area poorly provided with Public Open Space' designation and in close proximity to the remainder of this designation which extends between the railway line and St. Winifred's Road such that there is an opportunity to address this shortfall in provision;
- not within a Conservation Area nor contains Listed Buildings or Scheduled Monuments;
- visually contained in relation to the wider townscape;
- already characterised by playing fields which as a landscape feature are not rare or distinctive;
- bordered by mature trees which already provide a landscape framework in which to position the Proposed Development, in combination with providing varying degrees of softening existing views;
- within a townscape characterised by mixed architecture styles, with heights between 2 to 4 storeys and building plots up to 55m in length, such that there is an opportunity for new development within the Site to form a distinctive composition, akin to the published character guidance analysis of a 'Mixed Context';
- not publically accessible and therefore a void in terms of recreational opportunities;; and
- detracting from the existing townscape character as a result of the varying boundary treatments and overgrown/unmanaged vegetation.

9.3 The physical and visual constraints to development are:

- The existing tree's bordering the Site (including those with TPO) which can be retained and enhanced within the layout where possible, through offsetting new development in relation to root protection areas;
- The Thames Lea Tunnel below the southern part of the Site and requires a 6m offset from its route, which can be managed by not locating new built form along its route;
- The close range visibility form adjacent residential properties; however the visual appraisal has demonstrated that the degree of visibility varies, such that the north-east part of the Site is more visually contained due to existing vegetation and seen in the context of Fullerton Court when viewed from the south and west; and

- The OOLTI designation; however this does not preclude development and the existing character of the Site can be adequately and reasonably protected through enhancements to the Site and the substantial increase in public accessibility, biodiversity to the landscape and increased townscape value.

9.4 **Figure 8: Opportunities and Constraints Plan** schematically illustrates the above matters from the baseline review with:

- The Site is well enclosed from the wider townscape by the extent of surrounding built form, which includes the large scale massing of Fullerton Court and Victoria House, as well as large building plots along Udney Park Road up to 55m in length;
- The north-east part of the Site is visually enclosed to a greater degree than the remainder of the Site by the extent of existing vegetation bordering the Site. In addition, views of the northern part of the Site from surrounding properties are seen in the context of Fullerton Court;
- The Site exhibits varying boundary fencing, with the close boarded timber fencing reducing the permeability between the Site and the adjacent townscape. In contrast a more permeable fencing, as per the metal rail fencing and improved management of the boundary vegetation would provide increased permeability between the Site and the townscape, as well as an improved condition and aesthetic treatment; and
- There is an opportunity for new public access and linkages north to south across the Site, linking the surrounding pedestrian routes, as well as providing improved access towards Collis School.

Design Rationale

9.5 From the above the following design rationale is considered appropriate to successfully integrate new development within the Site and local townscape, as well as responding positively to the identified townscape policies and published character studies.

Access

- The Site is within a townscape characterised by built form interspersed with publically accessible spaces. The Site is therefore contrary to this existing townscape pattern and the ability to provide public access would reinforce the connectivity to the surrounding townscape as well as increasing the recreational value of the Site.

A Distinctive Composition

- With reference to LBoRuT Design Guide SDP, the Site is considered to be within a 'mixed townscape' whereby design should follow key components of the surrounding townscape, but also introduce a more distinctive composition;
- New built form within the Site should therefore reflect the surrounding townscape, which is predominantly Victorian and Edwardian properties. This exhibits a consistent scale of building, as well as pitched or mansard roof profiles. Therefore, new built form should similarly propose a massing which is consistent in its scale and roof profile;
- Successful larger scale massing within the surrounding townscape is articulated by the façade treatments and a variety of materials or elevation treatments, often delineating ground floor from upper storeys, along with detailing via balconies or stepping the upper storeys back from the main façade. Similar design cues from the surrounding townscape should therefore be included within any new built form with a use of brick and render; and
- Larger scale massing within the townscape is successful through its symmetrical layout and 'set-piece' presence. The new built form should therefore present an ordered arrangement to form a distinctive composition within the Site.

Enhance the Local Townscape Structure

- The perceived massing of the built form should be reduced through stepped or staggered arrangements both in plan form and across the facades;
- The layout should introduce permeability and articulation, to avoid a dominant single mass and retain views across the Site;
- The mass of the new built form should be softened by being set within a landscape setting, including for 'greening' of the built form through green roofs and an amenity landscape;
- The layout should incorporate high quality materials and detailing within the external surfaces to improve the perception of the public realm which is currently discordant with varied timber and metal rail fencing;
- Sport provision should ensure subtle colouring to finished surfaces and fencing to enable its integration; and
- The layout should minimise the extent of visible car-parking through soft landscaping and increase the publically accessible space within the Site.

Primary Mitigation

9.6 With reference to **Figure 9: Landscape Character Concept Plan** the following design measures have been included within the iterative process, such that they form the embedded mitigation to the scheme.

- Public recreation is provided across the Site through a new park, along with the provision of sports facilities and new built form set within a robust landscape strategy;
- The new built form is offset from existing TPO trees to retain this landscape structure along Kingston Lane;
- The majority of the built form (Plot A) is located in the north-east part of the Site to capitalise on the reduced inter-visibility between the Site and the surrounding townscape as a result of the existing boundary vegetation;
- The majority of the built form (Plot A) is also located in the north-east part of the Site to relate to the larger scale townscape massing of Fullerton Court and Victoria House;
- Built form within Plot A is orientated west to east so as to enable permeability across the Site and channelled views between the massing;
- Plot C adjacent to Udney Park Road is a logical extension of the existing settlement pattern and reflects the pattern of built form on the east side of this road, as exhibited by the clubhouse; and
- The built form and sports pitches are set within a robust landscape strategy which includes community uses with an orchard herb garden and wildlife pond. These features are part of the opportunities for improved biodiversity within the Site.

9.7 The resulting strategy establishes the following landscape character areas within the Site:

- Perimeter Trees;
- Internal Trees;
- Parkland;
- Sports Pitches; and
- Shared Spaces.

10.0 LIKELY EFFECTS

- 10.1 This section summarises the likely effects of the Proposed Development on the identified townscape features, townscape character and visual receptors. The effects are stated in full in **Appendices 6 and 7** along with an assessment of the sensitivity and magnitude of change for the identified receptors.
- 10.2 The assessment of effects includes the following periods:
- Construction (winter);
 - Year 1 of operation (winter); and
 - Year 15 of operation (summer).
- 10.3 The above year 1 and year 15 scenarios allow for an assessment of the Proposed Development at initial completion whilst the existing vegetation and proposed planting is not in leaf (reflecting a worst case scenario) and a latter best case scenario, with the new planting having established and in leaf, along with the existing vegetation.
- 10.4 In addition, at the time of submission and assessment, the retention or removal of 7 trees on Udney Park Road and 3 trees on Cromwell Road is still to be confirmed, as illustrated on the Landscape Proposals Plan, pending discussions with LBRuT. For the purposes of the assessment these trees are assumed to remain, as this is the design intention; however for transparency, this item has been highlighted at this stage and should discussions with the LBRuT require the removal of a number of these trees, then the TVIA will be updated to reflect this change.

Construction Phase - Landscape / Townscape

- 10.5 This phase of the assessment would include ground excavations, construction vehicles and compounds, cranes and scaffolding to implement the new built form. The assessment is based on the construction during winter months, when less vegetation is in leaf and on the assumption that construction activity is ongoing across the entire Site at the same time.

The Site

- 10.6 The construction activity would include machinery and compounds in combination with the construction of the new built form, sport pitches and park, which would result in a total alteration to the Site during this phase. This total alteration is due to the extent of excavation required to implement the new built form, hardstanding and playing pitches, as well as the localised re-profiling required for the new park. The retained trees and vegetation would be protected by construction exclusion zones and appropriate protection fencing, as well as Site

Compounds being sensitively located and maintained in good order, so as to limit the adverse change arising during the construction phase.

- 10.7 The total alteration to the Site would result in a large magnitude of effect, which in combination with the medium sensitivity of the Site would result in a major adverse effect during the construction phase.

Published Character Areas

- 10.8 There would be a neutral significance of effect to the national character area (NCA 115: Thames Valley) as a result of the very small scale of the construction activity compared with the wider extent of the NCA.
- 10.9 For the Borough townscape character area Strawberry Hill and Teddington East, the perception of the construction activity would be contained by the surrounding built form and therefore very localised to the immediate townscape. In addition, as the Site is not publically accessible there would be no temporary loss of access to an existing recreational asset. As a result the construction activity is considered to result in a very small magnitude of effect and a negligible adverse effect to the Strawberry Hill and Teddington East character area.

Townscape Character Areas (TCA) Identified via Filed Work

- 10.10 The Site is located within TCA 10: Udney Park and the construction activity would represent a noticeable change to the character of this area, due to the perceived extent of the construction activity and that it is located centrally within the TCA. The construction activity would therefore result in a medium magnitude of effect and a moderate adverse effect to TCA 10: Udney Park during the construction phase.

Construction Phase - Visual Receptors

- 10.11 There would be close range views of the construction of the new park and refurbishment of Plot B, along with views of the construction of Plot A for residents in Fullerton Court. The majority of the construction works associated with Plot C would be screened by the scale of the existing clubhouse in relation to views from Fullerton Court. The construction activity would therefore represent a pronounced change to the view from Fullerton Court and a major adverse effect during the construction phase.
- 10.12 For residential receptors to the north-east the Site on Kingston Lane (Virginia House to nos. 41 Kingston Lane), there would be close range views of the works associated with Plot A, including the construction of the new access points. The views of the construction activity will be partially softened by the existing vegetation on the eastern edge of the Site, especially in relation to views from Virginia House, however overall the construction activity will represent

a pronounced change and major adverse significance of effect. This effect would be lesser for those properties to the east and south-east of the Site (nos. 43-67), also on Kingston Lane, as a result of the construction of the new sports facilities and park requiring a lesser extent and duration of constructing activity compared to the construction of the built form within Plot A. The significance of effect would therefore be moderate adverse during the construction phase for properties nos. 43-67.

- 10.13 For residential receptors on Cromwell Road the focus of the construction activity will be in the foreground view associated with the implementation of the new sports pitches, with views also extending across the Site to include the construction of Plot A. This construction activity would represent a major adverse significance of effect during the construction phase, as it represents a pronounced change to the view.
- 10.14 For residential receptors on Udney Park Road, there will be a range of major to moderate adverse significance of effect as a result of close range views of the construction of Plot C and refurbishment of Plot B, in combination with views of the construction of Plot A and the new park.

Operation Phase Years 1 and 15- Landscape / Townscape

- 10.15 The operational phase at year 1 is also assessed during winter and would introduce:
- a new park and recreational and educational facilities (gifted to the CIC as custodians of the Community) providing new public access to the Site;
 - Enhanced play and sporting opportunities for all ages and abilities, including provision of a 3G pitch;
 - a new GP Surgery and extra care apartments in the north-east part of the Site (Plot A);
 - refurbishment of the existing clubhouse (Plot B);
 - extra care apartments adjacent to Udney Park Road (Plot C);
 - Space for local groups and community activities;
 - Modern, multi-use facilities to meet the needs of local clubs;
 - Affordable housing solutions for the elderly population;
 - Employment opportunities; and
 - Enhanced biodiversity and habitat creation.

Effects to Site Features

- 10.16 There would be an increase in the existing tree stock as a result of the new planting across the Site. This increase is beneficial for the landscape structure and biodiversity of the Site and is balanced against the removal of 1 tree on Kingston Lane and 1 tree on Cromwell Road to facilitate access to the Site and the potential removal of 7 trees on Udney Park Road and 3

trees on Cromwell Road. On balance therefore the effect to the existing trees at year 1 would be minor beneficial.

- 10.17 With the establishment of the new planting combined with the positive management of the existing and proposed planting (as set out in **Appendix 5: Landscape and Biodiversity Management Strategy**), the significance of effect to the trees at year 15 would be moderate beneficial.

The Site

- 10.18 The Proposed Development will introduce new built form and a change of land use to the Site, combining new public access with new recreational facilities, a park and extra care apartments, along with a publically accessible GP surgery.
- 10.19 These features will improve the recreational and educational value of the Site, the scenic quality, the association with the wider townscape and small parks and the function of the Site within the local community. The new planting, both within the public and private realms, as well as within the built form via green roofs, will provide opportunities for biodiversity enhancements across the Site.
- 10.20 These beneficial changes to the Site are balanced with the reduction in amenity grass; however this is considered to be of low landscape value and the new landscape structure provides improved biodiversity and recreational opportunities.
- 10.21 In relation to the change to the open character of the Site as a result of the introduction of Plot A and Plot C, there would be a technical reduction to this, as a result of new built form within the Site. However, the introduction of this new built form is balanced with the provision of a new park and that the spatial composition of the layout retains a predominantly open character in line with the OOLTI designation. This open character to the Site is retained by Plot A being located in the north-east part of the Site and Plot C forming part of the pattern of built form which already borders the Site. As noted, the Site already contains built form (Plot B) and structures (tennis courts) such that the degree of openness has already been lessened and the introduction of Plots A and B would therefore represent an acceptable redistribution of the open land within the Site, as the new open areas represent an improvement in quality and potential ecological value.
- 10.22 On balance, therefore, the Proposed Development is assessed as resulting in a minor beneficial effect to the Site at year 1 due to the balance between the new recreational and educational opportunities and access across the Site, the improved landscape structure and high quality built form and ecological opportunities, offset against the localised technical reduction in open character.

- 10.23 With the establishment of the new planting and the resulting improved integration of the new built form within the Site, the Proposed Development would result in a moderate beneficial effect at year 15.

Published Character Areas

- 10.24 There would be a neutral significance of effect to the national character area (NCA 115: Thames Valley) as a result of the very small scale of the Proposed Development in relation to the wider extent of the NCA at years 1 and 15 of operation.
- 10.25 For the Borough townscape character area Strawberry Hill and Teddington East, the Proposed Development would introduce a small pocket of publically accessible open space, reflecting the key characteristics of the area, as well as increasing the extent of tree coverage within a character area noted for its 'significant number of trees'.
- 10.26 The new built form reflects surrounding architectural styles and presents a unified composition, being symmetrically aligned around a central courtyard such that it forms a distinctive composition. The massing of the new GP Surgery and extra care apartments in Plot A is reduced through its stepped alignment in plan form and it establishes a consistent scale with its roof profile.
- 10.27 The Proposed Development would remain a minor component of the Strawberry Hill and Teddington East character area, and the perception would be localised to the surrounding street network. Therefore the effect to the character area would be negligible beneficial at years 1 and 15 of operation.

Townscape Character Areas (TCA) Identified via Filed Work

- 10.28 For TCA 10: Udney Park and the Proposed Development would enable public access to an area of the townscape that is in private usage. This public access would increase the recreational value of the Site as well as its direct physical connectivity with the surrounding townscape.
- 10.29 The new built form in Plot A (north-east part of the Site) is located adjacent to areas of existing larger scale massing within the TCA, at Fullerton Court and Victoria House. The extra care apartments on Udney park Road (Plot C) form a logical extension to Udney Park Road and reflect the character of the eastern side of this road consisting of larger built form (i.e. the existing clubhouse).
- 10.30 The new sports pitches would represent a higher aesthetic quality than the existing sports pitches as well as retaining an open character as a result of their flat ground plane.

- 10.31 The location and massing of the Proposed Development therefore responds to the existing larger scale massing of Fullerton Court and Victoria House within TCA 10, as well as the overall form in the character area by retaining a constant roof line and presents a distinctive composition, reflective of the 'Mixed Context' townscape in which the Site is located. The Proposed Development would therefore result a minor beneficial effect for TCA 10 at year 1.
- 10.32 With the establishment of the new planting, and it being in leaf and further integrating and softening the new built form, the effect will be moderate beneficial at year 15 for TCA 10 as the parkland character of the Site fully establishes.

Visual Receptors Years 1 and 15

- 10.33 For receptors at Fullerton Court there will be open close range views of the new park which are considered to be beneficial in relation to the existing view of grassed sport pitches by providing a higher scenic quality and visual interest. Views of the new GP Surgery and extra care apartments (Plot A) would represent a higher architectural quality than the views of existing built form, albeit it would in part foreshorten views. On balance, the Proposed Development is assessed as resulting in a negligible beneficial effect to the view at year 1, which would increase to minor beneficial at year 15 with the establishment of the new planting creating an improved landscape structure within the view and softening of the views of Plots A and C.
- 10.34 The existing vegetation bordering the north-east edge of the Site would largely soften views of the new built form in relation to Virginia House. From properties nos. 33-41 on Kingston Lane the new built form would truncate some views across the Site, whilst channelling others. Plot A would foreshorten views of existing built form on Udney Park Road and would in part be softened by the retained vegetation along Kingston Lane, resulting in minor adverse effect at year 1. With the existing vegetation in leaf, in combination with the new vegetation structure within Plot A and the improved boundary treatments,, the effect on balance would be negligible beneficial at year 15.
- 10.35 For properties nos. 43-67 on Kingston Lane the new trees and vegetation structure and sports pitches would be perceived as an improved aesthetic quality than compared with the existing sports fields. The effect at year 1 would therefore be negligible beneficial, increasing to minor beneficial at year 15 with the establishment of the new planting.
- 10.36 For residential receptors on Cromwell Road, views across the Site would remain, with the new built form within Plot A seen within the context of Fullerton Court. Views of the new car-park are considered to reflect views of existing parked vehicles on Cromwell Road. The change to the view is therefore assessed as negligible beneficial as a result of views of a higher quality sports facility than compared to the existing amenity pitches, the new landscaping and

architectural quality of a higher aesthetic than Fullerton Court at year 1. With the existing and proposed planting being in leaf at year 15 the effect is assessed as minor beneficial.

- 10.37 For residential receptors on Udney Park Road opposite Plot C, the new built form will truncate views across the Site, although it will be seen in the context of existing built form on the eastern side of Udney Park Road. Plot C will therefore result in a moderate adverse effect at year 1 for these receptors directly opposite the plot, which will reduce to neutral at year 15 as a result of the existing vegetation being in leaf.
- 10.38 For the remaining residential properties on Udney Park Road, views of the clubhouse (Plot B) will remain, with the refurbishment resulting in a higher aesthetic quality, along with the new park, also introducing a higher scenic quality to the view. The new built form in Plot A, in the north-east part of the Site, will be seen in the context of existing large scale massing in the view (Fullerton Court) and result in a slight foreshortening of the view, which already includes residential properties on Kingston Lane. The balance between this and the improved aesthetic value resulting from the park and boundary treatments will result in a negligible beneficial effect at year 1. With the establishment of the new planting and the increased integration of the GP Surgery and extra care apartments in Plot A, the effect at year 15 would be Neutral.

Night Time Lighting

- 10.39 The Proposed Development would introduce additional lighting into the Site, as a result of the built form within Plots A and Plots C, the change of use to Plot B and the sports lighting for the pitches. All new lighting is assumed to be designed and implemented in accordance with best practice so as to minimize light spill.
- 10.40 As the lighting will be introduced within an existing lit townscape there will not be an increase in overall sky glow or ambient lighting from the Proposed Development.
- 10.41 There will be a localised increase in glare and light spillage, resulting from the internal lighting and sports pitch lighting; however as residential and pedestrian receptors surrounding the Site already experience glare and light spillage as a result of the street lighting the effect is assessed as minor adverse during operation year 1 and negligible adverse at year 15 as a result of the vegetation being in leaf.

Response to Policy

National Planning Policy Framework

- 10.42 In relation to the Core Planning Principles outlined in NPPF paragraph 17, the Proposed Development has taken account of the differing roles and character of the Site and surrounding area. This is notable through the division of land use within the Site, so that the new public

park extends across the Site, to facilitate connectivity and views from Fullerton Court; the massing of the GP Surgery and Extra Care Apartments (Plot A) are located adjacent to existing larger scale massing and within part of the Site which benefits from screening by existing vegetation.

- 10.43 The role of the boundary trees, and their physical and visual relationship with the Site have also been retained overall and enhanced with new planting such that they would remain key features in the local townscape.
- 10.44 The Proposed Development achieves a high quality design, through the increased public realm and access across the Site and a new planting landscape strategy to link the varying land uses.
- 10.45 The overall retention of the existing vegetation in combination with the extensive areas of new public accessible space respond positively to NPPF section 11: Conserving and Enhancing the Natural Environment. The robust landscape strategy across the Site would therefore provide the opportunities for increased biodiversity across the Site.
- 10.46 The Proposed Development is therefore considered to contribute positively to protecting and enhancing the natural, built and historic environment, as well as helping to improve biodiversity across the Site.

National Planning Policy Guidance (NPPG)

- 10.47 The Proposed Development is considered to respond positively to the stated Design requirements through the layout establishing the functionality of the Site, split between a GP Surgery, extra care apartments and new community spaces, such that it would support mixed uses.
- 10.48 The Proposed Development includes for a series of linked public spaces, establishing distinct character across the Site and establishing an attractive and distinctive character, as well as facilitating ease of movement both for future occupiers of the Site and existing residents bordering the Site.

Regional

- 10.49 In relation to the London Plan, the overall retention of the vegetation bordering the Site, extensive public realm and new planting across the layout responds positively to Policy 5.3 Sustainable Design and Construction and the need to promote and protect biodiversity and Green Infrastructure within projects and Policy 5.10 Urban Greening, whereby Green Infrastructure have been incorporated from the beginning of the design process, including as green roofs and walls. Policy 5.11 Green Roofs and Development Site Environs states that

major development proposals should be designed to include roof, wall and site planting, which the Proposed Development has included.

- 10.50 In relation to Policy 7.4 Local Character, the Proposed Development has had regard to the form, function and structure of the townscape through the location of the GP Surgery and extra care homes (Plot A) adjacent to existing large scale massing; the new park extending across the Site and the extra care apartments (Plot C) forming a logical extension of the existing settlement pattern along Udney Park Road.
- 10.51 The Proposed Development would improve the area's visual connections through the removal of discordant boundary timber palisade fencing and replacement with a consistent metal rail fence and low hedging. The Proposed Development would improve the physical connections between the surrounding townscape via the new park and new crossing to Collis School.
- 10.52 The Proposed Development therefore has regard to the pattern and grain of the existing residential townscape surrounding the Site, reflected in the proposed footprints and buildings scales; contributes positively to the urban structure and natural landscape features by retaining existing vegetation overall and through the implementation of a new landscape framework.
- 10.53 Similarly, the Proposed Development responds positively to Policy 7.5 Public Realm, in creating public spaces that relate to their context. The built form would make a positive contribution to the townscape skyline, through reflecting a consistent roof line across the extra care apartments within Plot A, thereby responding positively to Policy 7.6 Architecture.

Borough

Core Strategy (adopted 2009)

- 10.54 In response to the Core Strategy Objectives for 'Protecting Local Character', the Proposed Development is based upon a layout which reflects the balance between areas for quiet enjoyment, wildlife and areas for sports, in accordance with the Richmond Borough Open Space Strategy 2005.
- 10.55 The size of the proposed new park would equate to a 'Local Park' as defined by the open space hierarchy. The Proposed Development incorporates the requirements of the Local Park function through providing children's play, court games and nature conservation.

Policy CP1: Sustainable Development

- 10.56 The Proposed Development layout responds positively to this policy by retaining the natural vegetation, especially the trees, around the perimeter of the Site where possible, as well as

minimising the use of open land for built development, through the majority of the Site being a new park.

Policy CP4: Biodiversity

- 10.57 The Policy notes that parts of Teddington are deficient in biodiversity and therefore the Proposed Development responds positively to this deficiency through the provision of a new landscape framework across the Site, including orchards, herb gardens and new native trees and shrubs, wildflowers and ponds.

Policy CP7: Maintaining and Improving the Local Environment

- 10.58 The Proposed Development has recognised the distinctive local townscape character and reflected this through retaining and enhancing the existing vegetation on the Site; implementing new built form with a consistent roof line and proportioned layout akin to other larger scale buildings in the area and ensuring a new land use which will be well used and valued by the local community.
- 10.59 The Proposed Development has been informed by the TVIA which has identified the existing character of the surrounding townscape, the important features and visual context, such that the Proposed Development has evolved from a detailed understanding of the Site and its role in the wider neighbourhood.
- 10.60 The new recreational areas within the Site and the spaces between the buildings have been designed to ensure a high quality environment, one that is multi-functional and provides connectivity across the Site and with the surrounding townscape, including a new crossing of Cromwell Road to link with Collis School.

Policy CP10: Open Land and Parks

- 10.61 The Proposed Development introduces a new publically accessible park within the townscape. This therefore improves the biodiversity, sport, recreation and visual aspects of the Site and responds positively to the policy requirements.

Development Management Plan (adopted November 2011)

Policy DM SD 1: Sustainable Construction

- 10.62 The new planting and green roofs across the Proposed Development are considered to aid in adapting to climate change.

Policy DM SD 4: Adapting to Higher Temperatures and Need for Cooling

- 10.63 The Proposed Development responds positively to the policies supporting text through the provision of a high quality green space within the Site, including for ecological and recreational uses, as well as urban greening through new tree planting and green roof design.

Policy DM SD 5: Living Roofs

- 10.64 The Proposed Development has incorporated living roofs (green roofs).

Policy DM OS 5: Biodiversity and new development

- 10.65 In response to this policy, the Proposed Development has preserved and enhanced the existing habitats on Site through the retention and positive management of the trees. The Proposed Development has also introduced new habitats and biodiversity features in accordance with the Policy, which make a positive contribution to the Site and wider green infrastructure.

Policy DM OS 6: Public Open Space

- 10.66 The Proposed Development creates new public open space within the townscape, through making the Site publically accessible.

Policy DM OS 8: Sport and Recreation Facilities

- 10.67 In accordance with this policy, the Proposed Development enhances the existing sports provision on Site and makes them available for public access and use.

Policy DM OS 9: Floodlighting

- 10.68 The assessment has demonstrated that there would not be demonstrable harm to the character of the night sky as a result of the Proposed Development. This is because there is already street lighting and residential lighting bordering the Site, as well as existing lighting from within the Site via the clubhouse.

Policy DM DC 1: Design Quality

- 10.69 The Proposed Development is of a high architectural and design quality, which is inclusive through providing new public access with informal recreational space and new sports facilities.

Policy DM DC 2: Layout and Design of Mixed Use Scheme

- 10.70 The Proposed Development would add to the vitality of the area by providing accessible open space and recreational activities.

- 10.71 The potential adverse impacts of the Proposed Development have been taken account of by positioning the extra care apartments and GP surgery (Plot A) adjacent to existing larger scale massing and in a part of the Site which benefits from softening and screening of views by existing vegetation which is retained within the Proposed Development.
- 10.72 Additionally, the layout provides access across the Site such that there are shared facilities and areas for parking and amenity space, making the best use of land.

Policy DM HO 2: Infill Development

- 10.73 The proposed plot widths enable separation to be retained between dwellings, with the height of the Proposed Development reflecting those of Fullerton Court, as well as retaining the important trees along the boundary of the Site overall.

Local Plan Publication version for consultation

LP 1: Local Character and Design Quality

- 10.74 The Proposed Development is based upon a thorough understanding of the Site and how its relates to the surrounding townscape, such that the new built form of the GP surgery and Extra Care Apartments is reflective of the larger scale massing bordering the Site and of an architectural quality and character to improve the quality of the area.
- 10.75 The layout is compatible with the local character, in that it locates Plot A adjacent to Fullerton Court and Virginia House (existing larger scale massing), as well as utilising existing screening provided by vegetation. Plot C forms a logical extension of the existing settlement pattern on the east side of Udney Park Road, which is characterised by the existing clubhouse.
- 10.76 The layout is considered to make the best use of the land by enabling a linear park to extend the full length of the Site, providing access and connectivity across the Site and with the surrounding townscape.

LP 2: Building Heights

- 10.77 The Proposed Development has respected the existing building heights surrounding the Site, which in relation to Fullerton Court has a ridge level at +21.32 AOD. The Proposed Development GP surgery steps down in height from Fullerton Court with the top of roof level within Plot A at +22.81 AOD. With the ground floor level at +9.40 AOD, the overall height of built form within Plot A is 13.41m and therefore below the 18m threshold constituting 'taller buildings' and not 'significantly taller than' surrounding buildings.

10.78 The mass of the Plot A is also softened and reduced by the stepped top storey, along with the delineation between base, middle and top across the façade and the articulation by balconies,

10.79 The consistent scale across Plot A and with Plot C reflects the surrounding urban pattern, roofscape and grain of the townscape. Similarly the face brickwork and render are materials found in the surrounding townscape, along with balconies.

LP 5: Views and Vistas

10.80 As identified by the visual assessment, the Proposed Development does not impact upon any of the identified views and vistas as identified on the proposal maps.

LP 9: Floodlighting

10.81 As per Policy DM OS 9: Floodlighting, the TVIA assessment has demonstrated that there would not be demonstrable harm to the character of the night sky as a result of the Proposed Development. This is because there is already street lighting and residential lighting bordering the Site, as well as existing lighting from within the Site via the clubhouse.

LP 12: Green Infrastructure

10.82 The Proposed Development enhances the existing green infrastructure contribution of the Site, through making it publically accessible, introducing new native planting and a positive management regime, as well as green roof systems.

LP 15: Biodiversity

10.83 The Proposed Development incorporates new habitats, including trees and ensures new biodiversity features including ponds, orchards and herb gardens. The Proposed Development is therefore considered to enhance the opportunity of the Site as a wildlife corridor.

LP 16: Trees, Woodlands and Landscape

10.84 The Proposed Development protects the existing trees bordering the Site overall and provides substantial additional planting across the Site to create new high quality spaces within the Site, delivering amenity and biodiversity benefits. The positive management regime for the Site will ensure that the Proposed Development continues to protect and enhance the existing and proposed landscape structure.

LP 17: Green Roofs and Walls

10.85 The Proposed Development incorporates green roofs within Plot A.

11.0 OPEN SPACE ASSESSMENT

11.1 The Site is covered by a number of policies at a local level which are outlined below. In addition a review of the National Planning Policy Framework (2012) is included in relation to the requirements of designating new local green space.

National Planning Policy Framework (2012)

11.2 In relation to NPPF Paragraph 14, the Site does not currently fall within any areas covered by policies within the NPPF, as set out in NPPF Footnote 9 of Paragraph 14 that would restrict the presumption in favour of sustainable development, subject to complying with and meeting the criteria of Paragraph 14.

11.3 NPPF Paragraph 73 sets out that planning policies should be based on robust and up-to-date assessments of the needs for open space, sports and recreation facilities and opportunities for new provision. Specific needs and quantitative and qualitative deficiencies and surpluses in local areas should also be identified. This information should be used to inform what provision is required in an area.

11.4 As a prerequisite paragraph 74 of the NPPF states existing open space, sports and recreation sites, including playing fields, should not be built on unless:

- An assessment has been undertaken, which has clearly shown the site to be surplus to requirements;
- The loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; and
- The development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.

11.5 NPPF Paragraph 77 addresses Local Green Space, setting out that:

"The Local Green Space designation will not be appropriate for most green areas or open space. The designation should only be used:

where the green space is in reasonably close proximity to the community it serves;

where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and

where the green area concerned is local in character and is not an extensive tract of land."

11.6 Paragraph 78 also notes that:

"Local policy for managing development within a Local Green Space should be consistent with policy for Green Belts."

Borough Level

Richmond Core Strategy

- 11.7 Open spaces are cited as part of the 'protecting local character' theme. Setting out that outstanding natural and historic environments as well as biodiversity will be protected and enhanced. Both the River Thames and River Crane are identified as key priorities.
- 11.8 Paragraph 4.4.25 and 6.2.2 reiterate the need to make the best use of existing facilities and the importance of local biodiversity. The latter, especially, in the pressure for both built development and recreation.
- 11.9 Policy CP10 Open Land and Parks states open environment will be protected and enhanced. In particular metropolitan open land and other land of townscape importance will be safeguarded and improved for biodiversity, sport, heritage and visual reasons. It highlights that many of the Borough's parks and open spaces are of metropolitan importance for providing recreational opportunities. This is in addition to also having historic and biodiversity value.
- 11.10 Furthermore, it details that new provision will be encouraged in areas of open space deficiency; with developments being expected to incorporate appropriate elements of open space in order to make a positive contribution (in accordance with Planning Obligations policies and Strategy).
- 11.11 With reference to Richmond Borough Council's on-line Park and Open Spaces web-page, there are 5 parks in Teddington:
- Church Road Play Area;
 - Grove Gardens;
 - Manor Road Recreation Ground;
 - Udney Hall Gardens; and
 - Vicarage Road.

London Borough of Richmond Upon Thames Local Development Framework: Development Management Plan (Adopted November 2011)

11.12 The Site is allocated, under Policy DM OS 3: Other Open Land of Townscape Importance (OOLTI) which states:

"Other Open Land of Townscape Importance

Other open areas that are of townscape importance will be protected and enhanced in open use.

It will be recognised that there may be exceptional cases where appropriate development is acceptable. The following criteria must be taken into account when assessing appropriate development:

1. It must be linked to the functional use of the Other Open Land of Townscape Importance; or

2. It can only be a replacement or minor extension of existing built facilities;

3. In addition to 1. or 2., it does not harm the character and openness of the open land.

Improvement and enhancement of the openness and character of other open land and measures to open up views into and out of designated other open land will be encouraged where appropriate.

When considering developments on sites outside designated other open land, any possible visual impacts on the character and openness of the designated other open land will be taken into account."

11.13 The supporting text to Policy DM OS 3 states:

"4.1.6 Other Open Land of Townscape Importance (OOLTI) can include public and private sports grounds, school playing fields, cemeteries, allotments, private gardens, areas of vegetation such as street verges and mature trees. The designated areas are shown on the Proposals Map but there will also be other areas which could be considered as being of local value to the area and townscape which merit protection.

4.1.7 In some parts of the borough, open areas, including larger blocks of back gardens, which are not extensive enough to be defined as green belt or metropolitan open land, act as pockets of greenery of local rather than London-wide significance. Many of these are of townscape importance, contributing to the local character and are valued by residents as open spaces in the built

up area. Policy DM HO 2 'Infill Development' and Policy DM HO 3 'Backland Development' also recognise the importance of gardens, which will be considered as greenfield sites. Green oases are particularly important and will be protected in areas of high density development and town centres.

4.1.8 OOLTI should be predominantly open or natural in character. The following criteria are taken into account in defining OOLTI:

- *Contribution to the local character and/or street scene, by virtue of its size, position and quality.*
- *Value to local people for its presence and openness.*
- *Immediate or longer views into and out of the site, including from surrounding properties.*
- *Value for biodiversity and nature conservation.*

Note that the criteria are qualitative and not all need to be met.

4.1.9 The purpose of this policy is to safeguard this open land and ensure that it is not lost to other uses without good cause. Protecting and opening up views into and out of designated other open land is encouraged because of the contribution to the distinctive character of an area and the benefits to all. Where a comprehensive approach to redevelopment can be taken, such as on major schemes or regeneration proposals, or for social community or educational uses, it may be acceptable to re-distribute the open land within the site, providing that the new open area is equivalent or improved in terms of size, shape, location, quality and potential ecological value."

11.14 Policy DM OS 6: Public Open Space, relating to the south-west part of the Site as an 'Area poorly provided with Public Open Space' states:

"Public Open Space will be protected and enhanced. Improvement of the openness and character of the Public Open Space including measures to allow for convenient access for all residents will be encouraged where appropriate.

New Public Open Space with convenient access for all will be provided where possible, or existing areas made more accessible, particularly in areas poorly provided with public open space. These will be linked to the wider network of open spaces. Financial contributions will be required for most new developments towards the provision of, or improvements to public open space.

Larger new developments will be expected to include open space provision within the scheme, with the aim to strike a balance between private, semi-private and public open space provision.

11.15 The supporting text to Policy DM OS 6 stated that the proposed areas deficient in public open space are derived from a 400m buffer adjacent to designated Public Open Space.

London Borough of Richmond Upon Thames Local Plan, Publication version for consultation, 4th January 2017 – 15th February 2017

11.16 The LBRuT, Publication Version, at Paragraph 5.2, sets out the policy for Green Belt, Metropolitan Open Land and Local Green Space, under Policy LP 13, which states that, with specific reference to Local Green Space:

"Policy LP 13

Local Green Space

D. Local Green Space, which has been demonstrated to be special to a local community and which holds a particular local significance, will be protected from inappropriate development that could cause harm to its qualities."

11.17 Paragraphs 5.2.8 to 5.2.10 provide supporting text with regard to Policy LP13, with specific regard to Local Green Space, as set out below:

"5.2.8 Local Green Space, as identified on the Proposals Map, is green or open space which has been demonstrated to have special qualities and hold particular significance and value to the local community which it serves.

5.2.9 In line with the NPPF, managing development within a Local Green Space should be consistent with policy for Green Belt. Development, which would cause harm to the qualities of the Local Green Space, will be considered inappropriate and will only be acceptable in very special circumstances where benefits can be demonstrated to significantly outweigh the harm.

5.2.10 The following criteria are taken into account when defining Local Green Space:

- ***The site is submitted by the local community;***
- ***There is no current planning permission which once implemented would undermine the merit of a Local Green Space designation;***
- ***The site is not land allocated for development within the Local Plan;***
- ***The site is local in character and is not an extensive tract of land;***

- ***Where the site is publicly accessible, it is within walking distance of the community; OR where the site is not publicly accessible, it is within reasonably close proximity to the community it serves;***
- ***The Local Green Space is demonstrably special to a local community and holds a particular local significance, for example, because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife;***
- ***The Local Green Space designation would provide protection additional to any existing protective policies, and its special characteristics could not be protected through any other reasonable and more adequate means."***

11.18 With regard to the Proposals Map Changes for Publication Local Plan, the changes include designating the Site (given the title in the emerging Local Plan as Udney Park Playing Fields) as Local Green Space, as set out in Section 2.2: Local Green Space, and with reference to Paragraphs 2.2.1 to 2.2.3. The justification for the designation is set out in Paragraphs 2.2.2 to 2.2.3, and states:

"Reason for Local Green Space Designation

2.2.2 Udney Park Playing Fields are already designated as Other Open Land of Townscape Importance (OOLTI) and also benefit from a designation as an Asset of Community Value.

2.2.3 Policy LP 13 Green Belt, Metropolitan Open Land and Local Green Space sets out the policy guidance in relation to Local Green Space, including criteria for designation. The Council has assessed the site against the criteria as set out in the Publication Local Plan policy as well as national guidance, and considers that it meets all of the following criteria:

The site is submitted by the local community;

There is no current planning permission which once implemented would undermine the merit of a Local Green Space designation;

The site is not land allocated for development within the Local Plan;

The site is local in character and is not an extensive tract of land;

Where the site is publicly accessible, it is within walking distance of the community; OR where the site is not publicly accessible, it is within reasonably close proximity to the community it serves;

The Local Green Space is demonstrably special to a local community and holds a particular

local significance, for example, because of its beauty, historic significance, recreational value(including as a playing field), tranquillity or richness of its wildlife;

The Local Green Space designation would provide protection additional to any existing protective policies, and its special characteristics could not be protected through any other reasonable and more adequate means."

11.19 The London Borough of Richmond Upon Thames Local Plan, Publication Version, retains a policy for designating Other Open Land of Townscape Importance, in the amend form of Policy LP 14, which sets out that:

"Other Open Land of Townscape Importance

Other open areas that are of townscape importance will be protected in open use, and enhanced where possible.

It will be recognised that there may be exceptional cases where appropriate development is acceptable. The following criteria will be taken into account when assessing whether development is appropriate:

a. it must be linked to the functional use of the Other Open Land of Townscape Importance;

or

b. it can only be a replacement of, or minor extension to, existing built facilities; and

c. it does not harm the character or openness of the open land.

Improvement and enhancement of the openness or character of other open land and measures to open up views into and out of designated other open land will be encouraged.

When considering developments on sites outside designated other open land, any possible visual impacts on the character and openness of the designated other open land will be taken into account."

11.20 Paragraphs 5.3.1 to 5.3.7 provide the supporting text to Policy LP14, setting out that:

"5.3.1 The purpose of this policy is to safeguard open land of local importance and ensure that it is not lost to other uses without good cause. Areas designated as Other Open Land of Townscape Importance (OOLTI) form an important part of the multi-functional network of Green Infrastructure and they can include public and private sports grounds, school playing fields,

cemeteries, allotments, private gardens, areas of vegetation such as street verges and mature trees. The designated areas are shown on the Proposals Map.

5.3.2 In some parts of the borough, open areas, including larger blocks of back gardens, act as pockets of greenery of local rather than strategic significance. Many of these are of townscape importance, contributing to the local character and are valued by residents as open spaces in the built up area. Green oases are particularly important in areas of higher density development including in the borough's centres.

5.3.3 This policy can also apply to other open or natural areas that are not designated, but which are considered to be of local value, and therefore merit protection.

5.3.4 OOLTI should be predominantly open or natural in character. The following criteria are taken into account when defining OOLTI (note that the criteria are qualitative and not all need to be met):

- ***Contribution to the local character and/or street scene, by virtue of its size, position and quality.***
- ***Value to local people for its presence and openness.***
- ***Immediate or longer views into and out of the site, including from surrounding properties.***
- ***Contribution to a network of green spaces and green infrastructure as set out in policy LP12 in 5.1 'Green Infrastructure'.***
- ***Value for biodiversity and nature conservation.***

5.3.5 This policy can also apply to other open or natural areas that are not designated, but which are considered to be of local value in line with the criteria set out above, and therefore merit protection.

5.3.6 Where a comprehensive approach to redevelopment can be taken, such as on major schemes or regeneration proposals, or for community and social infrastructure including educational uses, it may be acceptable to re-distribute the designated open land within the site, provided that the new open area is equivalent or improved in terms of quantum, quality and openness.

5.3.7 Protecting and opening up views into and out of designated OOLTI is encouraged because of the contribution they can make to the distinctive character of an area and the benefits to all."

London Borough of Richmond Upon Thames Open Space Assessment Report, April 2015

11.21 The Assessment Report provides detail with regard to what provision exists in the Borough, its condition, distribution and overall quality. It also considers the demand for provision based on

population distribution, planned growth and consultation findings. The Strategy (to follow the assessment reports) will give direction on the future provision of accessible, high quality, sustainable provision for open spaces, sport and recreation in the LBoRuT.

11.22 The Site is included as Imperial College (Teddington Sports Ground):

"Tenure of the Imperial College (Teddington Sports Ground) and Richmond upon Thames College sites may be regarded as unsecured; as the Council has no control over the level of community use that takes place. Imperial College has ceased using the site for its sporting activities after the acquisition of a new sports ground in Heston. In addition, very little community use is currently identified (although club cricket does occur). Local residents have recently raised concerns towards any potential sale of the site for housing. However, it is identified in the Local Plan policies as a site designated as Other Open Land of Townscape Importance and in Policy Development Management Open Space 8 which would preclude development."

11.23 Additionally:

"Two senior pitches at the Imperial College (Teddington Sports Ground) site are not currently being used, although technically still available for community use and football pitches at the site are still being used by community clubs."

11.24 The Site is assessed as 'under-used':

"The Imperial College...show spare capacity in the peak period. However, caution towards the genuine ability for such sites to accommodate play should be given; as neither site is currently used by clubs. As stated earlier the Imperial College site is no longer used by the University and the pitches are rated as poor for quality."

London Borough of Richmond Upon Thames Playing Pitch Strategy, August 2015

11.25 This Strategy provides a strategic framework for the maintenance and improvement of existing outdoor sports pitches and ancillary facilities between 2015 and 2020, replacing the Sport, Open Space and Recreation Study (2008).

11.26 This acknowledges that the Site is not in use.

11.27 With regards to Rugby Union the Study concludes for a number of locations, including the Site:

"if these sites were not available, overall in LBRuT there would be a shortage of match equivalent sessions in the future. Therefore there is a need to retain identified spare capacity at the Imperial College."

11.28 The management guidance for the Site are:

ID	Site	Sport	Current Status	Recommended Actions	Objective
26	Imperial College (Teddington Sports Ground)	Cricket	Used predominantly by Richmond CC. Spare capacity identified.	Potential improvements should be explored in order to increase site quality.	Protect, Enhance
		Football	Spare capacity identified in peak time on two adult pitches.	Explore potential creation and/or re-designation of pitches to meet current demand expressed by clubs and future population demand particularly for youth 11v11 pitches.	Protect, Provide, Enhance
		Rugby	No club use identified.	Potential for site to be used for rugby in the future should be retained as a reserve option.	Protect, Provide, Enhance

Enhancements to the Site

11.29 The Proposed Development will deliver enhanced sporting and community facilities, new public open space, and care-led accommodation for the elderly with publicly accessible healthcare services.

11.30 In addition, the Proposed Development would increase the appreciation of the openness of the Site, with increased views into and out of the Site, achieved through the replacement of the close board fencing and management of the existing boundary vegetation, to increase the visual permeability of the Site. The increase of availability of views from within the Site will be delivered through the provision of public access across the Site.

Contribution to Other Open Land of Townscape Importance

11.31 The Proposed Development offers real enhancements to the Other Open Land of Townscape Importance, in accordance with the policy objectives set out in both the existing adopted Policy DM OS3 and the emerging Policy LP 14.

11.32 Whilst the Proposed Development would result in a technical reduction in overall open space, the comprehensive approach to the redevelopment of the Site would result in an acceptable re-distribution of open land within the Site, such that there would be a significant increase in publicly accessible open land, in terms of publicly accessible informal and formal open space and sports pitch provision, to be enjoyed by immediately adjoining residents and visitors.

- 11.33 The accessible open space would also be of an improved quality; through the range of function and use, that is through the provision of informal public open space, a Multi-Use Games Area (MUGA), children's play area and higher quality pitch provision allowing for greater flexibility and intensity of use; through creation of more natural areas associated with the informal public open space with enhanced biodiversity and nature conservation value; and with an improvement to the landscape and visual character, through tree planting and landscape proposals to introduce variety and interest.
- 11.34 The Proposed Development would result in the Site making a greater positive contribution to the surrounding townscape; providing an enhancement to the local character and street scene through the increased visibility of the Site, improved boundary treatments and greater diversity in character across the Site. The Site would therefore continue to perform its function as a valued open space within the built up area, with a greater appreciation of the open nature of the Site from surrounding residents.
- 11.35 The Proposed Development would also enable the Site to make a greater contribution to the multi-functional network of surrounding Green Infrastructure, with increased access and permeability across the Site creating linkages with the surrounding area.
- 11.36 The proposals for the Site would therefore result in an **"enhancement of the openness and character of the open land"**, and would **"open up views into and out of the open land"**, as encouraged by both adopted Policy DM OS 3 and emerging Policy LP 14.
- 11.37 The Proposed Development would increase the attributes of the Site that contribute to its designation as Other Open Land of Townscape Importance in terms of the criteria set out in Paragraph 4.1.8 of adopted Policy DM OS 3, as follows:

"Contribution to the local character and/or street scene, by virtue of its size, position and quality.

- ***Value to local people for its presence and openness.***
- ***Immediate or longer views into and out of the site, including from surrounding properties.***
- ***Value for biodiversity and nature conservation."***

- 11.38 Furthermore, the Proposed Development would also increase the contribution that the Site makes to the network of green spaces and green infrastructure, with regard to the additional criterion, in addition to the above, set out in Paragraph 5.3.4 of emerging Policy LP 14:

"Contribution to a network of green spaces and green infrastructure as set out in policy LP12 in 5.1 'Green Infrastructure'."

11.39 The Proposed Development would therefore not only ***"not harm the character and openness of the open land"***, in accordance with the requirements set out in both adopted Policy DM OS 3 (Point 3) and emerging Policy LP14 (Point C), but would enhance the character and openness of the open land, resulting in the Site making a greater contribution to the function and objectives of designated Other Open Land of Townscape Importance.

Contribution to Local Green Space

11.40 In assessing the Site against the policy requirements for a Local Green Space as set out in the NPPF, the NPPF states that the designation should only be used:

- ***where the green space is in reasonably close proximity to the community it serves;***
- ***where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and***
- ***where the green area concerned is local in character and is not an extensive tract of land."***

11.41 With regard to the proximity to the community it serves, firstly, the Site is not publicly accessible, and is used by several sports clubs with the express consent of the landowner and on a temporary basis. The Site is therefore used by only relatively small sector of the local community, for limited periods of time on a temporary basis, therefore, whilst surrounded by local residents, it currently only serves, and is accessible to, a very small part of the local community and not permanently, and is therefore limited in the extent to which it "serves" the community.

11.42 With regard to being "demonstrably special", it is valued insofar as it is an open space within the suburban context of the surrounding settlement, nothing more.

11.43 However, as demonstrated by the TVIA, the appreciation of that openness is varied, both by the lack of public accessibility, and by the enclosed nature of much of the boundary treatment being close boarded fencing.

11.44 In terms of its local significance, recreational value and amenity is very restricted.

11.45 Whilst it has been in private recreational use for many decades, this has always been in private, related use, which does not expressly constitute 'historical significance', particularly when compared with other parks and open spaces in the locality, such as the likes of Bushey Park, Hampton Court, Ham House and Richmond Park which demonstrate "historical significance" (although knowledgably these are of too greater extent to be 'Local Green Space'). There are

several buildings of Townscape Merit, on Udney Park Road and Teddington High Street, however these are not directly related to the Site. Therefore, it is apparent that the Site exhibits limited 'historical significance'.

- 11.46 The Site does not exhibit tranquillity, being surrounding by roads and development on all sides, with no sense of remoteness, and influenced by suburban development on all sides, including noise, and lighting. Whilst the Site provides a contrast to the density of the surrounding suburban development, this is not readily appreciated from the wider area. It is not utilised for informal recreation, as use is limited to those sports clubs that have the express consent by the landowner for use on a temporary basis, such that it would not be readily experienced as a green space providing relief from the suburban environment.
- 11.47 With regard to richness of its wildlife, the Site exhibits very limited habitat diversity or wildlife richness, being predominantly uniform amenity playing field grassland, with any limited habitat variety restricted to very narrow margins on the boundaries of the Site.
- 11.48 Therefore, the Site in its current condition and use, with its current level of accessibility, and lack of **"beauty, historic significance, tranquillity and any richness in wildlife"** only very partially meets the NPPF requirements for the designation of Local Green Space.
- 11.49 In considering the Site against the policy requirements for Local Green Space Designation, as set out in the Publication Version of the emerging LBRuT Local Plan, the criteria to be taken into account when defining Local Green Space is set out in Paragraph 5.2.10, and sets out that:
- **"The site is submitted by the local community;**
 - **There is no current planning permission which once implemented would undermine the merit of a Local Green Space designation;**
 - **The site is not land allocated for development within the Local Plan;**
 - **The site is local in character and is not an extensive tract of land;**
 - **Where the site is publicly accessible, it is within walking distance of the community; OR where the site is not publicly accessible, it is within reasonably close proximity to the community it serves;**
 - **The Local Green Space is demonstrably special to a local community and holds a particular local significance, for example, because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife;**
 - **The Local Green Space designation would provide protection additional to any existing protective policies, and its special characteristics could not be protected through any other reasonable and more adequate means."**

- 11.50 Notably, the first three criteria are additional to the criteria set out in the NPPF, and are not specific to the character, use and function of Local Green Space, which is the general focus of the NPPF criteria. As set out in the first criteria, whilst the Site may have been submitted by two local groups (which may be considered as not representative of the wider community, as evidenced by the creation of the CIC which is supportive of the proposals for the site) for a Local Green Space designation, this is not necessarily a commendation per se for the designation of the Site as Local Green Space, as the NPPF sets out the type of characteristics that demonstrate being of local significance or special to a local community, for example because of its beauty, historic significance, recreational value (to that community), tranquillity or richness in its wildlife. It is more to do with seeking to stop any development of the Site from occurring.
- 11.51 With regard to the second and third criteria, whilst there is no current planning permission which once implemented would undermine the merit of a Local Green Space designation, and the land is not presently allocated for development, this does not relate to the merits of the Site in terms of its suitability for Local Green Space, with again regard to character, use and function.
- 11.52 The fourth, fifth and sixth criteria reflect the criteria for Local Green Space designation as set out in the NPPF, and as established above, the Site only very partially meets with the requirements for Local Green Space designation.
- 11.53 With regard to the final criteria, the Site is currently designated as "***Other Open Land of Townscape Importance***" as defined by Policy DM OS 3 of the adopted London Borough of Richmond Upon Thames Local Plan, and this policy is retained in the emerging Publication Version LBRuT Local Plan, as Policy LP 14: Other Open Land of Townscape Importance. This policy provides protection for the spatial character of the townscape of the borough, in particular to maintain predominantly open or natural areas, including areas that are of "value to local people for its presence and openness". Considering the current character, function and use of the Site, not what is proposed by the Quantum Group and the Teddington Sports Ground CIC, this is an appropriate policy to afford protection of important open land within areas of dense suburban development, and when considering the Site in the context of the criteria for Other Open Land of Townscape Importance, and the supporting text of the policy. Paragraph 4.1.8 of the adopted Local Plan sets out the criteria for Other Open Land of Townscape Importance as:
- ***"Contribution to the local character and/or street scene, by virtue of its size, position and quality.***
 - ***Value to local people for its presence and openness.***
 - ***Immediate or longer views into and out of the site, including from surrounding properties.***
 - ***Value for biodiversity and nature conservation.***

Note that the criteria are qualitative and not all need to be met.

11.54 Paragraph 5.3.4 sets out the criteria for Other Open Land of Townscape Importance, which in addition to the above includes the following criterion:

- ***"Contribution to a network of green spaces and green infrastructure as set out in policy LP12 in 5.1 'Green Infrastructure'."***

11.55 Importantly, to be designated Other Open Land of Townscape Importance, public access and recreational value are not required qualities, and therefore the Site is more compliant with the overall criteria for Other Open Land of Townscape Importance, as set out in both the adopted and the emerging Local Plan, than that for the designation of Local Green Space.

11.56 Of note is supporting text which sets out the purpose of Policy DM OS 3, and ways that such Other Open Land of Townscape Importance can be enhanced:

4.1.9 The purpose of this policy is to safeguard this open land and ensure that it is not lost to other uses without good cause. Protecting and opening up views into and out of designated other open land is encouraged because of the contribution to the distinctive character of an area and the benefits to all. Where a comprehensive approach to redevelopment can be taken, such as on major schemes or regeneration proposals, or for social community or educational uses, it may be acceptable to re-distribute the open land within the site, providing that the new open area is equivalent or improved in terms of size, shape, location, quality and potential ecological value."

11.57 Likewise, similar supporting text is set out in the emerging Local Plan, at paragraphs 5.3.1, 5.3.6 and 5.3.7, setting out that:

"5.3.1 The purpose of this policy is to safeguard open land of local importance and ensure that it is not lost to other uses without good cause. Areas designated as Other Open Land of Townscape Importance (OOLTI) form an important part of the multi-functional network of Green Infrastructure and they can include public and private sports grounds, school playing fields, cemeteries, allotments, private gardens, areas of vegetation such as street verges and mature trees. The designated areas are shown on the Proposals Map.

5.3.6 Where a comprehensive approach to redevelopment can be taken, such as on major schemes or regeneration proposals, or for community and social infrastructure including educational uses, it may be acceptable to re-distribute the designated open land within the site, provided that the new open area is equivalent or improved in terms of quantum, quality and openness.

5.3.7 Protecting and opening up views into and out of designated OOLTI is encouraged because of the contribution they can make to the distinctive character of an area and the benefits to all."

- 11.58 With regard to the final criteria for Local Green Space, the existing character of the Site can be adequately and reasonably protected by both the existing adopted Policy DM OS 3 and the emerging Policy LP14 with regard to Other Open Land of Townscape Importance. Furthermore, as set out in Policy L 13 Paragraph, to be designated as Local Green Space, it must be demonstrated that a green or open space has special qualities and holds a particular significance and value to the community it serves. However, as set out above, the Site has limited special qualities, more aligned with its designation as Other Open Land of Townscape Importance, and is very limited in the extent to which it "serves" the community, and therefore the additional protection of a Local Green Space designation is neither appropriate nor necessary.
- 11.59 However, should the Site be designated as Local Green Space, the proposals for the Site would provide significant benefits, such that the Site would provide a wide range of accessible informal and formal public open space, immediately adjoining the local community that it would then serve; with an increase in local significance by creating an attractive accessible green space of greater beauty, recreational value and richness of wildlife.
- 11.60 Therefore, the Proposed Development would be consistent with the allocation of the Site as a Local Green Space designation, should the Site be designated as such, and would therefore not conflict with the second criteria of Paragraph 5.2.10 of emerging Policy LP 13. The proposals for the Site would therefore contribute to the "very special circumstances where benefits can be demonstrated to significantly outweigh the harm", as set out in Paragraph 5.2.9 of Policy LP 13 of the emerging Local Plan.

12.0 SUMMARY AND CONCLUSION

- 12.1 As demonstrated by **Figure 1: Site Context Plan**, the Site is situated within Teddington's residential settlement pattern, being bounded by built form on Kingston Lane, Cromwell Land and Udney Park Road.
- 12.2 The Site is situated within a varied townscape, such that whilst there is a prevailing pattern of 2 to 3 storey Victorian and Edwardian residential properties, they are interspersed with larger scale buildings and small scale parks. The scale and mass of the residential properties are often extended by the fact they have large scale pitched roofs, or have introduced dormer or skylight windows into the roofscape.
- 12.3 The Site is not in public use and consists of grassed sports pitches, hard surfaced tennis courts, and a clubhouse. There are mature trees along the western and eastern edges of the Site, including TPOs on Kingston Lane and Udney Park Road.
- 12.4 The Site does not have any scenic quality as it is playing fields, a clubhouse and a tennis court; however it does present an evident contrast to the surrounding close knit residential built form and road networks.
- 12.5 The visual envelope of the Site is very localised to the surrounding streets of Udney Park Road, Kingston Lane and Cromwell Road. There are also a number of channelled views from properties in the adjoining streets including Chadwick Close and the rear elevations of properties bordering the High Street to the north of the Site as well as channelled views from the approach to the Site along Kingston Lane from the A310.
- 12.6 The Site is currently designated as "Other Open Land of Townscape Importance" as defined by Policy DM OS 3 of the adopted LBRuT Local Plan, and this policy is retained in the emerging Publication Version London Borough of Richmond Upon Thames Local Plan, as Policy LP 14: Other Open Land of Townscape Importance (OOLTI).
- 12.7 This policy provides protection for the spatial character of the townscape of the borough and a requirement for it to be enhanced in open use.
- 12.8 The Site is considered to have a townscape value in relation to its OOLTI requirements of:

"Contribution to the local character and/or street scene, by virtue of its size, position and quality; and

Value to local people for its presence and openness."

- 12.9 Whilst the Site evidently has a spatial relationship with the surrounding road networks and forms part of the localised townscape character, which are appropriate for the designation, the Site is not in public use. The Site does also not form part of any OOLTI 'longer views' due to the close proximity of surrounding properties; nor is it considered to be noted for its biodiversity or nature conservation value, another OOLTI criteria.
- 12.10 The south-west part of the Site and wider townscape to the south of the Site are designated as an 'Area poorly provided with Public Open Space'. This is reflected in the LBoRuT Open Space Assessment Report (April 2015) and LBRuT's Playing Pitch Strategy (August 2015), both of which stated the Site is 'under used' and 'not in use'. Policy: DM OS 6 of the Development Management Plan, requires new larger new developments to include open space provision, balancing between private, semi-private and public open space provision.
- 12.11 The Site is considered to provide the opportunity for development as it is:
- not covered by any national landscape designations;
 - not within a Conservation Area nor contains Listed Buildings or Scheduled Monuments;
 - visually well contained in relation to the wider townscape;
 - already characterised by playing fields which as a landscape feature are not rare or distinctive;
 - characterised by a surrounding mixed pattern of architecture, with heights between 2 to 4 storeys and building plots up to 55m in length, such that there is an opportunity for new development to form a distinctive composition;
 - not publically accessible and therefore a void in terms of recreational opportunities and connection to Green Infrastructure; and
 - exhibits degraded and varying boundary treatments.
- 12.12 From the TVIA analysis of the surrounding townscape and the Site, the design rational for new development should be based up on:
- Access;
 - A Distinctive Composition; and
 - Enhancing the Local Townscape Structure.
- 12.13 The design measures embedded within the scheme are
- Access is provided across the Site through a new park, along with the provision of sports facilities and new built form set within a robust landscape strategy;
 - The new built form is offset from existing TPO trees to retain the landscape structure around the edge of the Site;

- The built form is located predominantly in the north-east part of the Site to capitalise on the reduced inter-visibility with the surrounding residential townscape. This is as a result of the existing boundary vegetation on the north-east edge of the Site and that the north-east boundary of the Site also consists of residential back gardens, rather than being directly fronted by residential properties;
- The built form is also located in the north-east part of the Site to relate to the larger scale massing of Fullerton court and Victoria House;
- Built form is included on Udney Park Road as a logical extension of the existing settlement pattern and reflects the pattern of built form on the east side of this road, as exhibited by the pavilion;
- Built form is limited adjacent to Cromwell Road and the southern part of the Site to reflect the localised increased inter-visibility with these residential properties due to a lower number of street trees and oblique views form along Kingston Lane; and
- The built form and sports pitches are set within a robust landscape strategy.

Likely Effects of the Proposed Development

Townscape

- 12.14 The Proposed Development will introduce new built form and a change of land use to the Site, combining new public access with new recreational facilities, a park and extra care apartments, along with a publically accessible GP surgery.
- 12.15 These features will improve the recreational and educational value of the Site, the scenic quality, the association with the wider townscape and small parks and the function of the Site within the local community. The new park will provide opportunities for biodiversity enhancements with a new landscape structure across the Site and within the built form, via green roofs and ornamental planting.
- 12.16 In relation to the change to the open character of the Site as a result of the introduction of Plot A and Plot C, there would be a technical reduction to this, as a result of new built form within the Site. However, the introduction of this new built form is balanced with the provision of a new park and that the spatial composition of the layout retains a predominantly open character in line with the OOLTI designation. This open character to the Site is retained by Plot A being located in the north-east part of the Site and Plot C forming part of the pattern of built form which already borders the Site. As noted, the Site already contains built form (Plot B) and structures (tennis courts) such that the degree of openness has already been lessened and the introduction of Plots A and B would therefore represent an acceptable re-distribution of the open land within the Site, as the new open areas represent an improvement in quality and potential ecological value.

- 12.17 On balance, the Proposed Development is assessed as a minor beneficial effect to the Site at year 1 due to the balance between the new recreation and access, improved landscape structure and high quality built form, offset against the localised technical reduction in open character.
- 12.18 With the establishment of the new planting and the resulting improved integration of the new built form within the Site, the Proposed Development would result in a moderate beneficial effect to the Site at year 15.

Visual

- 12.19 For receptors at Fullerton Court there will be open close range views of the new park which are considered to be beneficial in relation to the existing view of grassed sport pitches by providing a higher scenic quality and visual interest. Views of the new GP Surgery and extra care apartments (Plot A) would result in a partial truncation in the view across the eastern part of the Site, albeit views of Plot A would be of a high architectural quality. On balance, the Proposed Development is assessed as resulting in a negligible beneficial effect to the view at year 1, which would increase to minor beneficial at year 15 with the establishment of the new planting within the park and adjacent to Plot A.
- 12.20 The existing vegetation bordering the north-east edge of the Site would largely soften views of the new built form in relation to Virginia House. From properties nos. 33-41 on Kingston Lane the new built form would both truncate and channel views across the Site, and result in a minor adverse effect at year 1. When in leaf, at year 15, the effect would be negligible beneficial, as the majority of the new built form in Plot A would be screened or softened by the existing and proposed planting and the new boundary treatments would result in a higher aesthetic quality to the view, along with views of a more vegetated structure within the park.
- 12.21 For the remaining properties on Kingston Lane the sports pitches would reflect an improved aesthetic upon the existing sports fields, as well as new parkland with tree planting and wildflowers, resulting in a negligible beneficial effect at year 1. With the establishment of the new planting the effect would be minor beneficial at year 15.
- 12.22 For residential receptors on Cromwell Road, views across the Site would remain, with the new built form of Plot A being seen within the context of Fullerton Court, as well as views extending through the new built forms within Plot A as a result of its central courtyard area enabling permeability. Views of the new car-park are considered to reflect views of existing parked vehicles on Cromwell Road. The change to the view is therefore assessed as negligible beneficial as a result of view of a higher quality sports facility, new landscaping and architectural quality of a higher aesthetic than Fullerton Court at year 1. With the existing and proposed planting being in leaf at year 15 the effect is assessed as minor beneficial.

- 12.23 For residential receptors on Udney Park Road opposite Plot C, the new built form will truncate views across the Site, although Plot C will be seen in the context of existing built form on the eastern side of Udney Park Road. The truncation of views across the Site will result in a moderate adverse effect at year 1. With the existing and proposed planting being in leaf at year 15, the effect is assessed as reducing to neutral.
- 12.24 For the remaining residential properties on Udney Park Road, views of the clubhouse (Plot B) will remain, with the refurbishment resulting in a higher aesthetic quality, along with the new park also introducing a higher scenic quality to the view. The new built form in the north-east part of the Site (Plot A) will be seen in the context of existing large scale massing in the view (Fullerton Court) and result in a slight foreshortening of the view, but on balance, the effect is assessed as negligible beneficial as a result of the improved aesthetic to the Site. With the establishment of the new planting and the increased integration of the GP Surgery and extra care apartments in Plot A, the effect at year 15 would be minor beneficial.

Other Open Land of Townscape Importance

- 12.25 The proposals offer real enhancements to the Other Open Land of Townscape Importance, in accordance with the policy objectives set out in both the existing adopted Policy DM OS3 and the emerging Policy LP 14.
- 12.26 Whilst the proposals would result in a technical reduction in overall open space, the comprehensive approach to the redevelopment of the Site would result in an acceptable re-distribution of open land within the Site, such that there would be a significant increase in publicly accessible open land, in terms of publicly accessible informal and formal open space and sports pitch provision, to be enjoyed by immediately adjoining residents and visitors.
- 12.27 The accessible open space would also be of an improved quality; through the range of function and use, that is through the provision of informal public open space, a Multi-Use Games Area (MUGA), children's play area and higher quality pitch provision allowing for greater flexibility and intensity of use; through creation of more natural areas associated with the informal public open space with enhanced biodiversity and nature conservation value; and with an improvement to the landscape and visual character, through tree planting and landscape proposals to introduce variety and interest.
- 12.28 The proposals for the Site would result in the Site making a greater positive contribution to the surrounding townscape; providing an enhancement to the local character and street scene through the increased visibility of the Site, and greater diversity in character across the Site; and continuing to perform its function as a valued open space within the built up area, with a greater appreciation of the Site from surrounding residents.

12.29 The proposals for the Site would also result in the Site making a greater contribution to the multi-functional network of surrounding Green Infrastructure, with increased access and permeability across the Site creating linkages with the surrounding area.

12.30 The proposals for the Site would therefore result in an "enhancement of the openness and character of the open land", and would "open up views into and out of the open land" through the removal of the timber close board fencing, as encouraged by both adopted Policy DM OS 3 and emerging Policy LP 14.

12.31 The proposals for the Site would increase the attributes of the Site that contribute to its designation as Other Open Land of Townscape Importance in terms of the criteria set out in Paragraph 4.1.8 of adopted Policy DM OS 3, as follows:

- ***"Contribution to the local character and/or street scene, by virtue of its size, position and quality.***
- ***Value to local people for its presence and openness.***
- ***Immediate or longer views into and out of the site, including from surrounding properties.***
- ***Value for biodiversity and nature conservation."***

12.32 Furthermore, the proposals for the Site would also increase the contribution that the Site makes to the network of green spaces and green infrastructure, with regard to the additional criterion, in addition to the above, set out in Paragraph 5.3.4 of emerging Policy LP 14:

"Contribution to a network of green spaces and green infrastructure as set out in policy LP12 in 5.1 'Green Infrastructure'."

12.33 The proposals for the Site would therefore not only ***"not harm the character and openness of the open land"***, in accordance with the requirements set out in both adopted Policy DM OS 3 (Point 3) and emerging Policy LP14 (Point C), but would enhance the character and openness of the open land, resulting in the Site making a greater contribution to the function and objectives of designated Other Open Land of Townscape Importance.

Conclusion

12.34 The Proposed Development has been based upon a thorough understanding of the local townscape character and the review of published LBoRuT studies and policy requirements. The new built form would be make a distinctive contribution to the local townscape, in line with the published guidance for a 'Mixed Context' townscape area.

12.35 The Proposed Development would result in beneficial townscape effects at years 1 and 15 of operation, such that the Site would provide a wide range of accessible informal and formal

public open space, providing an increase in attractive accessible green space of greater scenic quality, recreational and educational value and biodiversity value than the existing Site.



SITE APPRAISAL PHOTOGRAPH A



SITE APPRAISAL PHOTOGRAPH B



SITE APPRAISAL PHOTOGRAPH C



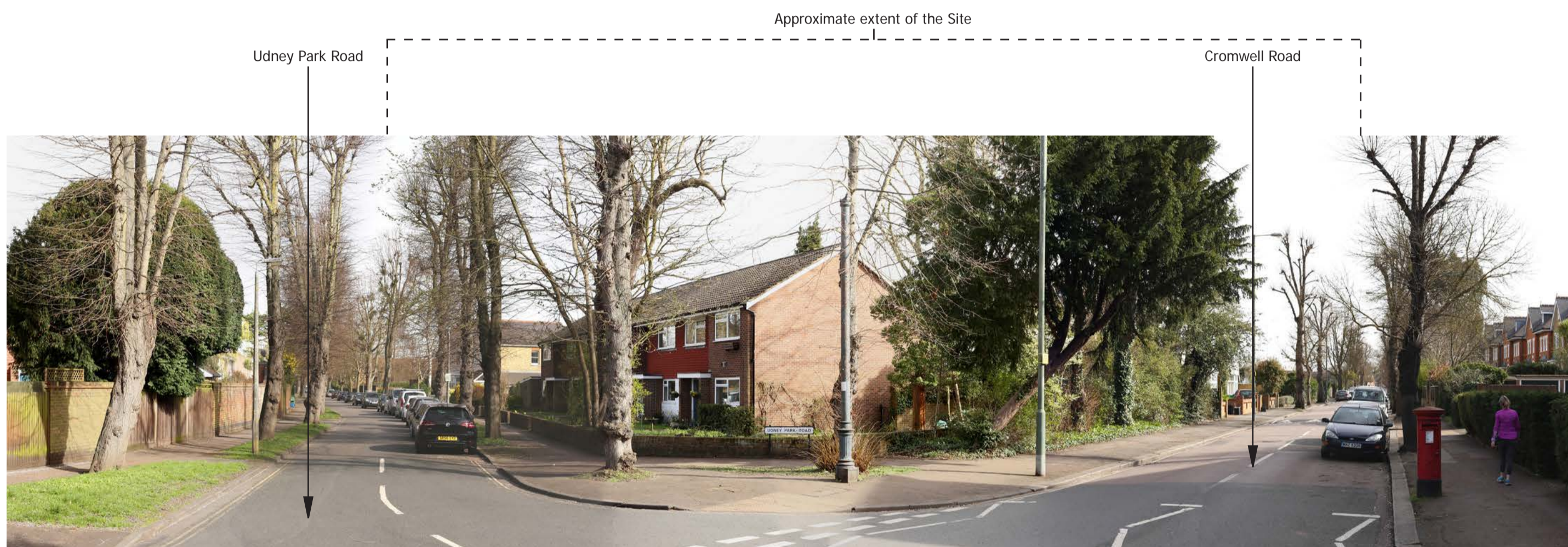
SITE APPRAISAL PHOTOGRAPH D

**TEDDINGTON
ATHLETIC GROUND**
 SITE APPRAISAL
 PHOTOGRAPHS: A - D
 RECOMMENDED VIEWING
 DISTANCE: 20CM @A1
 DATE TAKEN: FEB 2017
 PROJECT NUMBER: 25615





SITE CONTEXT PHOTOGRAPH 1: VIEW FROM CROMWELL ROAD, LOOKING NORTH-EAST



SITE CONTEXT PHOTOGRAPH 2: VIEW FROM CROMWELL ROAD, LOOKING EAST



SITE CONTEXT PHOTOGRAPH 3: VIEW FROM CROMWELL ROAD, LOOKING NORTH-EAST

TEDDINGTON
ATHLETIC GROUND

SITE CONTEXT
PHOTOGRAPHS: 1 - 3

RECOMMENDED VIEWING
DISTANCE: 20CM @A1

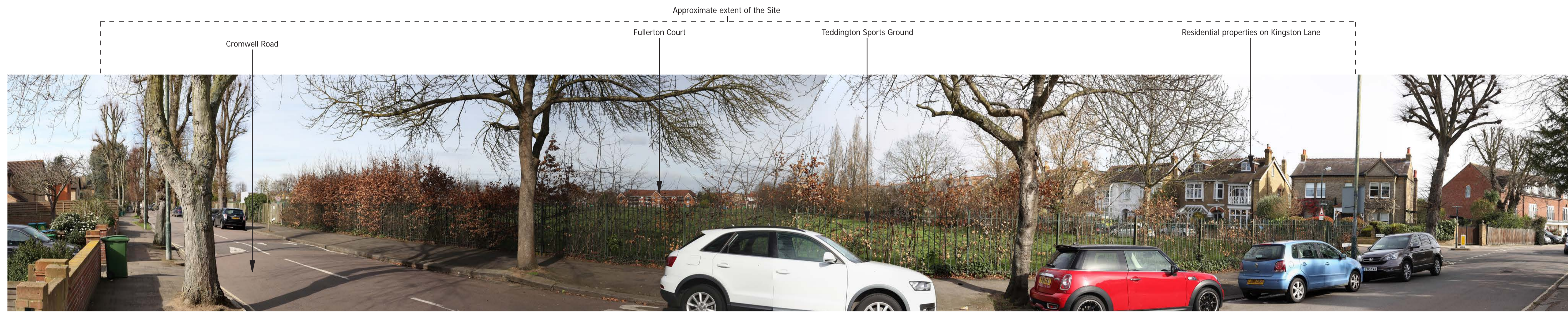
DATE TAKEN: MAR 2017

PROJECT NUMBER: 25615

**BARTON
WILLMORE**



SITE CONTEXT PHOTOGRAPH 4: VIEW FROM CROMWELL ROAD, LOOKING NORTH



SITE CONTEXT PHOTOGRAPH 5: VIEW FROM CROMWELL ROAD, LOOKING NORTH



SITE CONTEXT PHOTOGRAPH 6: VIEW FROM KINGSTON ROAD, LOOKING NORTH-WEST

TEDDINGTON
ATHLETIC GROUND

SITE CONTEXT
PHOTOGRAPHS: 4 - 6

RECOMMENDED VIEWING
DISTANCE: 20CM @A1

DATE TAKEN: MAR 2017

PROJECT NUMBER: 25615

**BARTON
WILLMORE**



SITE CONTEXT PHOTOGRAPH 7: VIEW FROM KINGSTON ROAD, LOOKING WEST



SITE CONTEXT PHOTOGRAPH 8: VIEW FROM KINGSTON LANE, LOOKING NORTH-WEST



SITE CONTEXT PHOTOGRAPH 9: VIEW FROM KINGSTON LANE, LOOKING NORTH-WEST

TEDDINGTON
ATHLETIC GROUND

SITE CONTEXT
PHOTOGRAPHS: 7 - 9

RECOMMENDED VIEWING
DISTANCE: 20CM @A1

DATE TAKEN: MAR 2017

PROJECT NUMBER: 25615

**BARTON
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SITE CONTEXT PHOTOGRAPH 10: VIEW FROM CROMWELL ROAD, LOOKING WEST



SITE CONTEXT PHOTOGRAPH 11: VIEW FROM LIDNEY HALL GARDENS, LOOKING SOUTH-WEST



SITE CONTEXT PHOTOGRAPH 12: VIEW FROM HIGH STREET, LOOKING SOUTH

TEDDINGTON
ATHLETIC GROUND

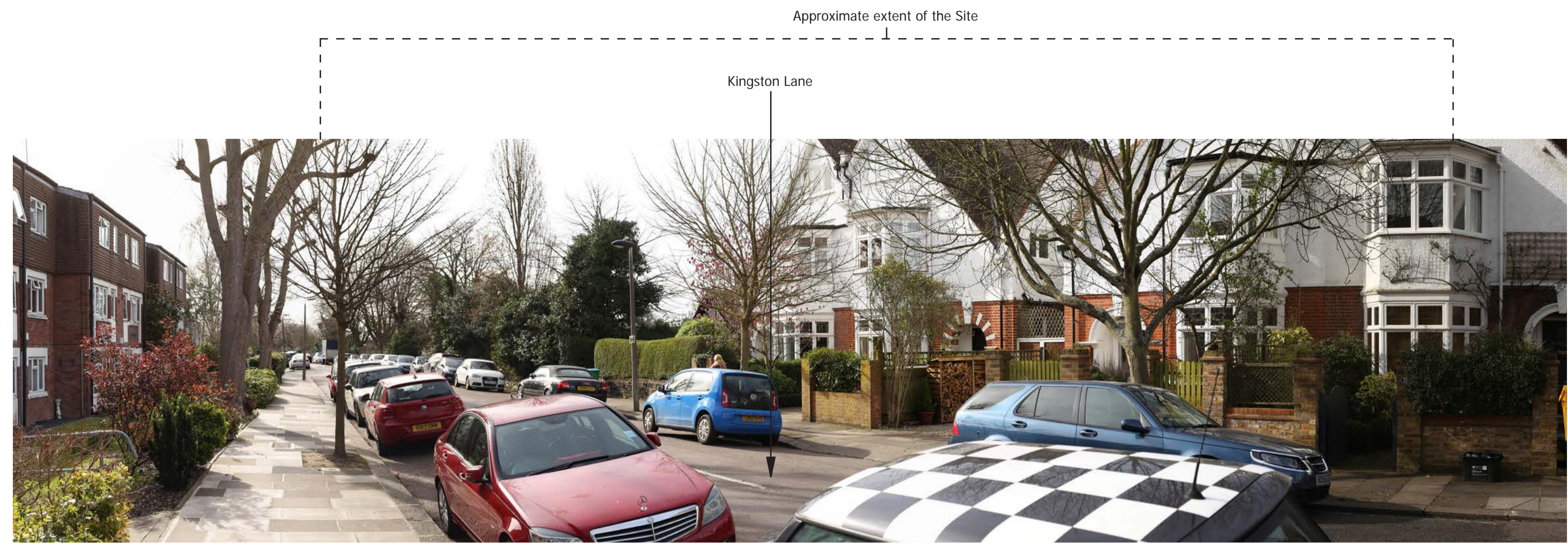
SITE CONTEXT
PHOTOGRAPHS: 10 - 12

RECOMMENDED VIEWING
DISTANCE: 20CM @A1

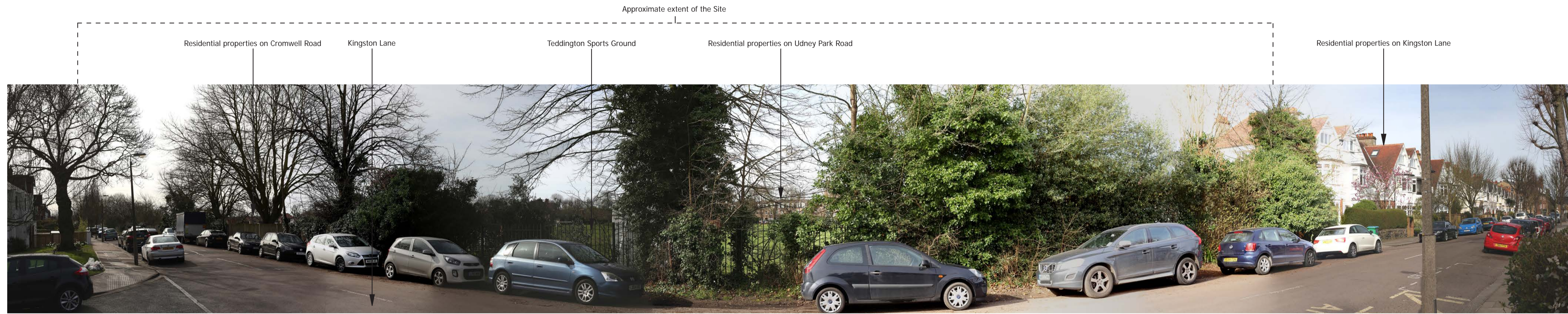
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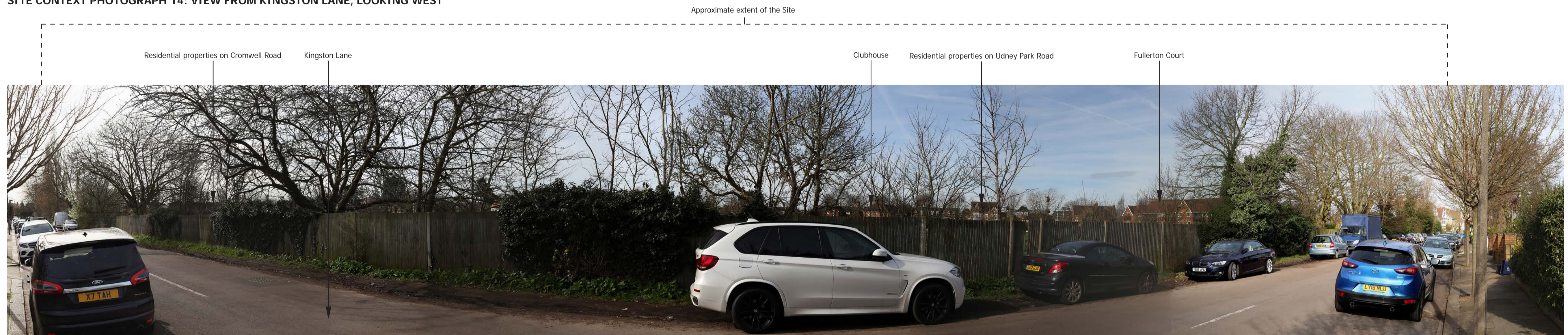
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SITE CONTEXT PHOTOGRAPH 13: VIEW FROM KINGSTON LANE, LOOKING SOUTH



SITE CONTEXT PHOTOGRAPH 14: VIEW FROM KINGSTON LANE, LOOKING WEST



SITE CONTEXT PHOTOGRAPH 15: VIEW FROM KINGSTON LANE, LOOKING WEST

TEDDINGTON
ATHLETIC GROUND

SITE CONTEXT
PHOTOGRAPHS: 13 - 15

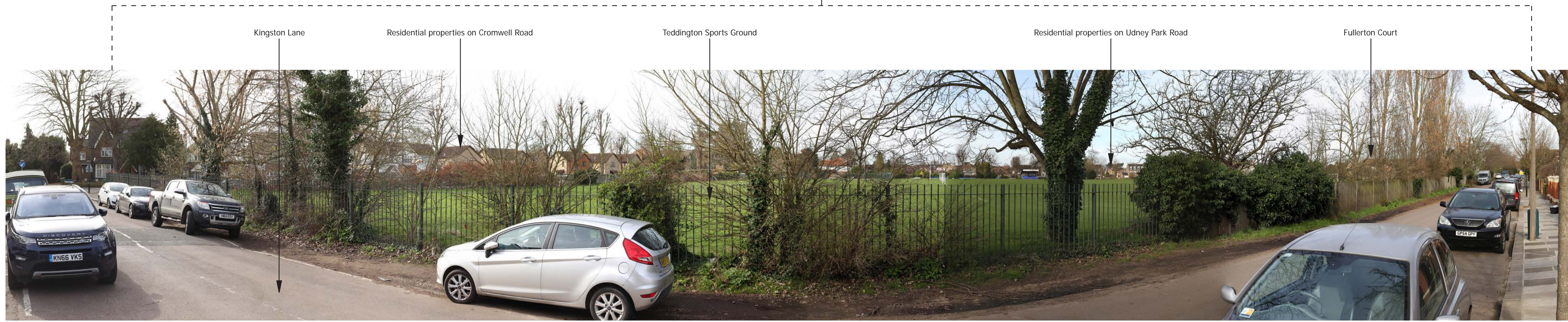
RECOMMENDED VIEWING
DISTANCE: 20CM @A1

DATE TAKEN: MAR 2017

PROJECT NUMBER: 25615

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Approximate extent of the Site



SITE CONTEXT PHOTOGRAPH 16: VIEW FROM KINGSTON LANE, LOOKING WEST

Approximate extent of the Site



SITE CONTEXT PHOTOGRAPH 17: VIEW FROM UDNEY PARK ROAD, LOOKING EAST

Approximate extent of the Site



SITE CONTEXT PHOTOGRAPH 18: VIEW FROM UDNEY PARK ROAD, LOOKING EAST

TEDDINGTON
ATHLETIC GROUND

SITE CONTEXT
PHOTOGRAPHS: 16 - 18

RECOMMENDED VIEWING
DISTANCE: 20CM @A1

DATE TAKEN: MAR 2017

PROJECT NUMBER: 25615

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