

Metropolitan Open Land Assessment

HARRODS WHARF, BARNES, SW13 8AD

Introduction

This assessment will consider the proposal for the development of ferry facilities, with the inclusion of two pavilions which encompass the ticket offices, staff room, storage/maintenance room and an enclosed waiting room with a café kiosk, along with associated works at Harrods Wharf, Barnes, against the Metropolitan Open Land designation on the site.

The site and surroundings

Harrods Wharf, is an un-used concrete and paved wharf on the south bank of the River Thames in Barnes. The Thames bounds the site to the north, east and south and the Thames tow path to the west.

The wharf was previously related to the operations at Harrod's Furniture Depository and was used as a point to load and unload furniture to be transported on the River Thames. Since this operation ceased this private parcel of land has been securely fenced off and gated, so there is access to the public.

The wharf is connected to the north west and south east by the Thames tow path.

Harrods Wharf is located within Metropolitan Open Land.

Policy

London Plan (2016) Policy 7.17 (Metropolitan Open Land) states that inappropriate development should be refused, except in special circumstances.

London Borough of Richmond upon Thames Local Plan (2020) Policy LP13 (Green Belt, Metropolitan Open Land and Local Green Space) sets out the protection of Metropolitan Open Land. It also explains that "*inappropriate development will be refused unless 'very special circumstances' can be demonstrated that clearly outweigh the harm to the Green Belt or Metropolitan Open Land.*"

Policy LP18 (River Corridors) notes in Part C (Public Access) that developments adjacent to the river's corridor should:

- a. *"Retain existing public access to the riverside and alongside the river; and*
- b. *Enhance existing public access to the riverside where improvements are feasible; or*
- c. *Provide new public access to the riverside where possible, and maintain existing points of access to the foreshore subject to health and safety considerations. There is an expectation that all major development proposals adjacent to the borough's rivers shall provide public access to the riverside.*
- d. *Provide riparian life-saving equipment where required and necessary."*

The Publication London Plan (2020) Policy G3 (Metropolitan Open Land) seeks that development should accord with the same national planning policy tests that apply to Green Belt and should be protected from inappropriate development. Additionally, Policy G4 (Open Space) notes that developments should not result in the loss of protected open space.

The national planning policy tests to which the Intend to Publish London Plan refers, are set out in the NPPF (2019). Of particular relevance to this application is paragraph 146 which sets out certain forms of development that are not considered inappropriate, including “*local transport infrastructure which can demonstrate a requirement for a Green Belt location*”.

Assessment

The scheme includes two pavilions which seek to provide the necessary space required to support the operation of the ferry terminal for the cross-river ferry service.

The wharf is a previously developed structure that was built to provide access to the River, which is currently vacant with no existing buildings on it. The scheme proposes two single storey pavilions with a total building footprint of 276sqm and a total floorspace of 218sqm, with an open-sided canopy between the two. Therefore, there would be new built form on the site.

Local Plan Policy LP13, Policy 7.17 of the London Plan and Policy G3 of the Publication London Plan, express the importance of protecting Metropolitan Open Land from inappropriate development, however the policies recognise that there are very special circumstances where appropriate development is acceptable and which can outweigh any harm caused to the character and openness of the Metropolitan Open Land. In this case, there is a very special circumstance with the need to provide a ferry crossing between Barnes and Hammersmith. With Hammersmith Bridge having been closed, this need is significant as evidenced with the creation of that national Hammersmith Bridge Task Force (hereafter ‘HB Task Force’). The HB Task Force has discussed and explicitly set out that a cross-river ferry service is required and should be operational by Spring 2021.

Policy G3 of the Publication London Plan further states Metropolitan Open Land should be considered in the same manner as national policy tests relation to Green Belt. Paragraph 145 of the NPPF (2019) sets out the criteria for exception and further to this, Part c of Paragraph 146 explains that local transport infrastructure that is able to demonstrate a requirement for a Green Belt location is considered not to be inappropriate, as long as it seeks to preserve the openness and does not conflict with the purposes of including land within it. The proposal does not undermine any of the five purposes set out. In accordance with NPPF Paragraph 145, this site will provide the land-based facilities required on the southern side of the River Thames for the cross-river ferry service. The proposal has been designed to seek that the openness is retained as much as possible with two pavilions located at either end of the site and a sleek canopy between them, which is open on both sides. Therefore, the proposal is providing the necessary facilitates for the local transport infrastructure and retaining the openness as much as possible. As such, it is not inappropriate development Thus, it is considered that this proposal is considered acceptable in line with the emerging Policy G3 of the Intend to Publish London Plan.

As mentioned above the scale and location of the proposed built form has been carefully considered to minimise the visual impact on the openness of the MOL. The pavilions are single storey and spaced out to reduce the massing on the site, and the site is well screened by mature trees, which have been designed around, therefore reducing the visual impact.

In terms of the impact on MOL within the Borough, London Plan Policy 7.17 advises that MOL should meet at least one of the following criteria:

- a. it contributes to the physical structure of London by being clearly distinguishable from the built-up area*
- b. it includes open air facilities, especially for leisure, recreation, sport, the arts and cultural activities, which serve either the whole or significant parts of London*
- c. it contains features or landscapes (historic, recreational, biodiversity) of either national or metropolitan value*
- d. it forms part of a Green Chain or a link in the network of green infrastructure and meets one of the above criteria.*

Each of these criteria are discussed in turn:

a. Harrods Wharf was built and used as part of the Harrods Depository to provide access to the River to transport goods. It therefore forms part of the built-up area.

b. The Wharf does not include any open air facilities for leisure, recreation, sport, the arts or cultural activities, serving the whole or significant parts of London. Indeed, there is not even any public access onto the Wharf.

c. The Wharf comprises entirely of flat hard standing, with no features or landscape of national or metropolitan value.

d. Finally, it is of negligible ecological value and does not form part of a Green Chain or a link in the network of green infrastructure.

In the qualitative assessment of Harrods Wharf, it is clear that it does not satisfy any of the criteria for MOL, as set out in the London Plan and overall can be considered to make a negligible contribution.

In quantitative terms, the London Borough of Richmond is reported to have some 527 hectares of open space of 0.2 hectares or more, some of which is designated as MOL. Harrods Wharf is only some 0.069 hectares, which is well below the threshold of the sites surveyed and represents just 0.013% of the open space in the Borough. Indeed, the 527 hectare total excludes some designated areas of MOL, such as the River Thames and Harrods Wharf.

In addition to the points set out above we believe it is important to consider the wider benefits of the scheme which we consider support the reasons that this proposal should be viewed as a very special circumstance:

- Harrods Wharf is fenced off and gated therefore does not provide public open space. This proposal will open the site up to the public and allow closer access to the water's edge for the first time. This supports the function of Metropolitan Open Land which is to improve the quality and accessibility to green infrastructure – in this case the Thames. It is also in line with the LB Richmond and the Mayor of London's

desire to improve public access to the riverside where possible, as set out in Part C of Policy LP18 of Local Plan and Policy 7.26 of the London Plan.

- Local residents, businesses and schools in both Barnes and Hammersmith will benefit immensely as they will be able to cross the river again, without having to travel a long way around. In addition to this, the benefit will also be realised in surrounding areas extending to the East Sheen, Putney, Chiswick and Hurlingham, as residents in the Barnes and Hammersmith areas will no longer need to use Chiswick Bridge and Putney Bridge to access the other side of the river, which in many cases is a daily trip for the residents.

Conclusion

Therefore, it is concluded that the necessary land-based facilities for the cross-river ferry service that is required between Hammersmith and Barnes, as a result of the closure of bridge, is a very special circumstance, which justifies the proposal fully.

In the qualitative terms, Harrods Wharf does not satisfy any of the criteria for MOL, as set out in the London Plan and overall can be considered to make a negligible contribution. In quantitative terms, the amount of land involved is only some 0.069 hectares and most of that will remain open, with views through to the River being maintained. It can be concluded therefore that the proposal will not have a detrimental impact on the quality or quantity of Metropolitan Open Land. Indeed, it will have a benefit of opening up the private land to the public for the first time, which is specifically encouraged by the London Plan.