

# Metropolitan Open Land (MOL) Openness Appraisal

Hampton Wick Royal Cricket Club, Full  
Application

May 2024

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**Client**  
Hampton Wick Royal Cricket Club

**Our reference**  
00653

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# 1. Introduction

- 1.1 This Metropolitan Open Land Openness Appraisal has been prepared by a Chartered Landscape Architect at Turley Landscape and VIA on behalf of the Hampton Wick Royal Cricket Club ('the Client' and 'the Applicant'), to provide relevant and proportionate information to the local planning authority, the London Borough of Richmond upon Thames (LBRuT), with regard to the likely impacts on the openness of Metropolitan Open Land (MOL) associated with the provision of a permanent replacement pavilion containing changing facilities, WC's, function area and club facilities at Hampton Wick Royal Cricket Club, Bushy Park, Hampton Hill, Hampton, TW11 0EA ('the Site').
- 1.2 The Application Site is within an area identified as 'Metropolitan Open Land' (MOL) in the LBRuT Local Plan<sup>1</sup>. This designation relates to preservation of the 'open character' of the land, rather than landscape/townscape value or sensitivity.
- 1.3 As background, the 'Proposed Development' for the purposes of this application for planning permission on Site is described as: *"The construction of a new pavilion for Hampton Wick Royal CC following a catastrophic fire which destroyed the previous building."* The LBRuT local validation checklist for proposals affecting designated Green Belt, Metropolitan Open Land, Other Open Land of Townscape Importance requires *'Open Space Assessment - demonstrating impact on Green Belt, Metropolitan Open Land or Other Open Land of Townscape Importance'*; for which this report is designed to now address the impact on the openness of the MOL.



**Figure 1.1: Illustrative Aerial view of proposed building prepared by AROS Architects**

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<sup>1</sup> Local Plan, London Borough of Richmond Upon Thames, July 2018

## 2. Baseline Analysis of Metropolitan Open Land Openness

### MOL Policy Context

- 2.1 *Policy G3 – Metropolitan Open Land of the London Plan (2021)<sup>2</sup> states that Metropolitan Open Land (MOL) is ‘afforded the same status and level of protection as Green Belt’ and states that MOL land should be ‘protected from inappropriate development in accordance with national planning policy tests that apply to the Green Belt’.*
- 2.2 Policy G3 states that MOL land should meet at least one of the four criteria:
- “1) it contributes to the physical structure of London by being clearly distinguishable from the built-up area*
  - 2) it includes open air facilities, especially for leisure, recreation, sport, the arts and cultural activities, which serve either the whole or significant parts of London*
  - 3) it contains features or landscapes (historic, recreational, biodiverse) of either national or metropolitan value*
  - 4) it forms part of a strategic corridor, node or a link in the network of green infrastructure and meets one of the above criteria.”*
- 2.3 The London Plan goes on to state the importance of MOL land:
- “Metropolitan Open Land is strategic open land within the urban area. It plays an important role in London’s green infrastructure – the network of green spaces, features and places around and within urban areas. MOL protects and enhances the open environment and improves Londoners’ quality of life by providing localities which offer sporting and leisure use, heritage value, biodiversity, food growing, and health benefits through encouraging walking, running and other physical activity.”*
- 2.4 The London Plan affords the same level of protection to MOL as Green Belt land, therefore, Green Belt policy and guidance is relevant to this appraisal. In Green Belt terms, the concept of ‘openness’ relates to the absence of built development (which includes both buildings and hard surfacing), and is capable of having both spatial and visual aspects. Planning Practice Guidance (PPG) provides guidance for considering the potential impact of development on the openness of the Green Belt:
- “Assessing the impact of a proposal on the openness of the Green Belt, where it is relevant to do so, requires a judgment based on the circumstances of the case. By way of example, the courts have identified a number of matters which may need to be taken into account in making this assessment. These include, but are not limited to:*

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<sup>2</sup> London Plan, The Spatial Development Strategy for Greater London, Greater London Authority, March 2021.

- *openness is capable of having both spatial and visual aspects – in other words, the visual impact of the proposal may be relevant, as could its volume;*
- *the duration of the development, and its remediability – taking into account any provisions to return land to its original state or to an equivalent (or improved) state of openness; and*
- *the degree of activity likely to be generated, such as traffic generation.*

2.5 Policy LP13 Green Belt, Metropolitan Open Land and Local Green Space of the Local Plan<sup>3</sup> states that:

*“A. The borough’s Green Belt and Metropolitan Open Land will be protected and retained in predominately open use. 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.*

*Appropriate uses within Green Belt or Metropolitan Open Land include public and private open spaces and playing fields, open recreation and sport, biodiversity including rivers and bodies of water and open community uses including allotments and cemeteries. Development will be supported if it is appropriate and helps secure the objectives of improving the Green Belt or Metropolitan Open Land.*

*B. It will be recognised that there may be exceptional cases where inappropriate development, such as small scale structures for essential utility infrastructure, may be acceptable.*

*C. Improvement and enhancement of the openness and character of the Green Belt or Metropolitan Open Land and measures to reduce visual impacts will be encouraged where appropriate.”*

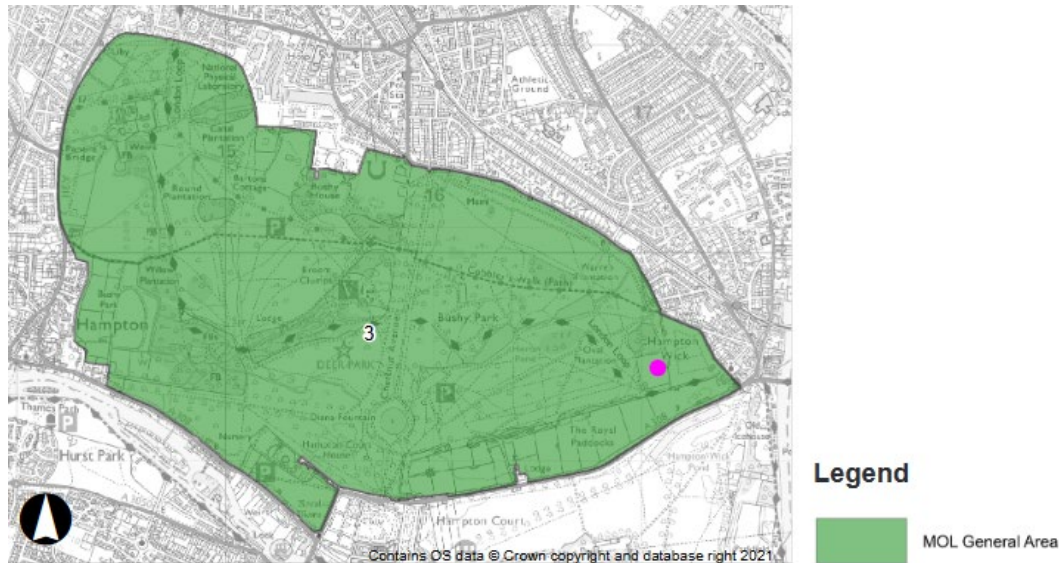
### **Existing MOL Assessment**

2.6 London Borough of Richmond upon Thames, commissioned ARUP to produce a boroughwide Open Land Review including MOL, to inform the new Local Plan. Within the report<sup>4</sup> the Site is located within Parcel 3 Bushy Park. A detailed assessment of the contribution of each parcel to the criteria of the MOL is included within the accompanying Metropolitan Open Land Review Annex Report. The parcel is a large area (447.41ha) covering the extent of Bushy Park.

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<sup>3</sup> Local Plan, London Borough of Richmond Upon Thames, July 2018

<sup>4</sup> Green Belt, MOL, LGS and OOLTI Review Final Report, London Borough of Richmond Upon Thames, 31 August 2021



**Figure 2.1: MOL Parcel 3 Map – extract from the Metropolitan Open Land Review Annex Report. Approximate Site location shown as pink dot by author.**

2.7 The Annex provides an assessment of each parcel against the London Plan MOL Criteria. An extract from the Annex showing the Parcel 3 criteria is given below:

<b>MOL assessment summary</b>					
	<b>Criterion 1</b>	<b>Criterion 2</b>	<b>Criterion 3</b>	<b>Criterion 4</b>	<b>Overall Rating</b>
<b>MOL Parcel score</b>	<b>5</b>	<b>5</b>	<b>5</b>	<b>5</b>	<b>5</b>

**Figure 2.2: Assessment of parcel against London Plan MOL criteria**

2.8 Reference to the “*cricket ground and multiple sports grounds*” which are described as having “*local importance*” is provided within the summary of Criterion 2. However, the criteria goes on to state that the recreational and cultural importance of the parcel outweighs its local scale importance for sports activities. The Parcel 3 performs strongly against the five MOL assessment criteria.

**Existing contribution of the Site to MOL Openness**

2.9 The Site is located in the southeast corner of Bushy Park. Kings Field is located to the south of the Site, beyond a high brick wall. To the east of the Site, the Royal Paddocks Allotment is located and again separated from the Site by a high brick wall. An area of woodland referred to as the Millennium Wood is located to the north of the Site.

2.10 The Site comprises of the existing cricket ground which is contained by a low timber post and rail fence and is predominantly open in character. Beyond the fence, a gravel path follows the north and western perimeter of the Site. The remnants of the former pavilion are located on the eastern edge of the Site close to the allotment wall. A carpark is located to the north of the pavilion and is accessed from the north via a small track which connects to Sandy Lane, the carpark is contained by metal fencing. To the south west of the Site, are a group of cricket nets.



2.11 The Site is an established sports facility and contains structures associated with that use (remnants of the former pavilion (**Figure 2.3**), fences and cricket pitch nets), which introduce minor urbanising features into the open land at a local scale. Furthermore, the Site sits adjacent to other urbanising influences such as the allotments to the east, rugby grounds to the south within Kings Fields, and settlement edge of Hampton Wick further east and north east. When considering the Site’s contribution to the sense of openness of the MOL as a whole, it includes small scale built form and modest urbanising elements to the edges of the MOL which do not detract from the overall perceived openness of the area.



**Figure 2.3: Remnants of former Cricket Pavilion damaged by arson attack**

2.12 The Site is well contained in views from the south and east, where the high walls that surround the Site limit more extensive views, and from the north where the Millennium Wood filters views. The Site is most visible from the west due to the open landscape of Bushy Park. Due to the relative level topography and limited clusters of trees in this area, extensive and panoramic views are possible of the Site (**Figure 2.4**). This includes as far afield as the Diana Fountain, Heron Pond and Leg of Mutton Pond. The Bushy Park Management Plan<sup>5</sup> describes views of the park and sports fields as:

*“Views in the main body of the park are, in the main, open, extensive and varied with the wide areas of grassland punctuated by occasional plantations and parkland trees. In these settings, views of the car parks, sports fields, pavilions, associated storage and*

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<sup>5</sup> Bushy Park Management Plan, The Royal Parks, Draft 2014-2024

*boundaries intrude on the otherwise rural character of the parkland, but bring their own character variations and animation.”*



**Figure 2.4: Example of panoramic view towards the Site from Bushey Park - the Site is visible towards the distance of the view seen within the foreground of the urban influence of development around the edge of Bushy Park seen in the distance.**

- 2.13 Views from the Site outwards are similarly open to the west and more contained to the south, east and north. The existing structures within the Site (remnants of the former pavilion, fences and cricket pitch nets) marginally reduce the level of visual and physical openness of the MOL at a Site level. Compared to areas to the west which have a high level of visual openness. Due to the limited number of structures and low heights of structures within the Site, those features do not typically detract from the sense of openness which is perceived within the wider MOL.
- 2.14 The Site does make a moderate contribution to the MOL openness. When reviewed against the criteria of London Plan Policy G3, the Site performs most strongly against criterion 2 (includes open air facilities e.g. for sport) and less so for criterion 1 (contributing to the physical structure of London), where the Site forms a small contribution as part of the wider Parcel 3. The land comprises primarily open sports ground but is influenced by adjacent urban features, and limited structures within the Site. In relation to criterion 3, the Site is located within the Bushy Park Conservation Area, and also falls within the boundary of the Bushy Park Registered Park and Garden, therefore contributes a small part to the wider historic designation. Bushy Park is designated as a Site of Special Scientific Interest (SSSI), however the Hampton Wick Royal Cricket Ground is excluded from this designation and is well managed as a cricket ground, therefore the Site has limited contribution to criterion 4.



### 3. Assessment of Effects on MOL Openness

#### Application Scheme

- 3.1 The 'Proposed Development' for the purposes of this application for full planning permission on Site is described as:

*“The construction of a new pavilion for Hampton Wick Royal CC following a catastrophic fire which destroyed the previous building.”*



**Figure 3.1: Proposed Site Location prepared by AROS Architects (proposed pavilion shown to the east of the Site)**

- 3.2 The full application submission material should be read in conjunction with this MOL Openness Appraisal. This includes the Design & Access Statement (DAS) and drawings prepared by AROS Architects (including extract at **Figure 3.1**).
- 3.3 The impact of the Proposed Development on the physical and visual openness of the MOL is described below.

#### Impacts on MOL Openness

- 3.4 As described in the baseline section, it is considered that the Site currently makes a moderate contribution to MOL openness at a local level. The land comprises of a sports

ground with associated structures and hardstanding and is influenced by adjacent urbanising influences on the edge, and beyond the boundary of Bushy Park.

- 3.5 The Proposed Development would introduce a new permanent two storey pavilion containing changing facilities, WC's, function area and club facilities, positioned to match the location of the former pavilion building. The comparative figures provided by AROS architects demonstrating the changes in building footprint and volume are provided below:

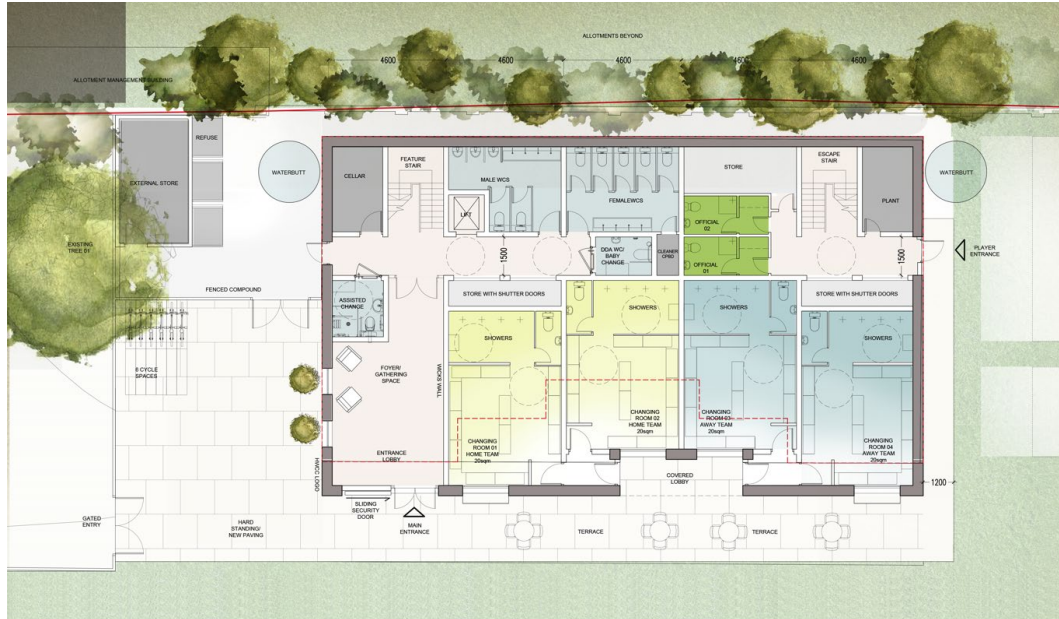
**Table 3.1: Comparative Areas Proposed/Existing**

	Former Pavilion Area(pre-fire)	Proposed Pavilion Area	Net Difference
Ground Floor Gross External Area (GEA)	266m <sup>2</sup>	320m <sup>2</sup>	+54m <sup>2</sup> (+20.3%)
Hardstanding	286m <sup>2</sup>	223m <sup>2</sup>	-63m <sup>2</sup> (-22.0%)
<b>Total</b>	<b>552m<sup>2</sup></b>	<b>543m<sup>2</sup></b>	<b>-9m<sup>2</sup></b> <b>(-1.63%)</b>

**Table 3.2: Comparative Volumes Proposed/Existing**

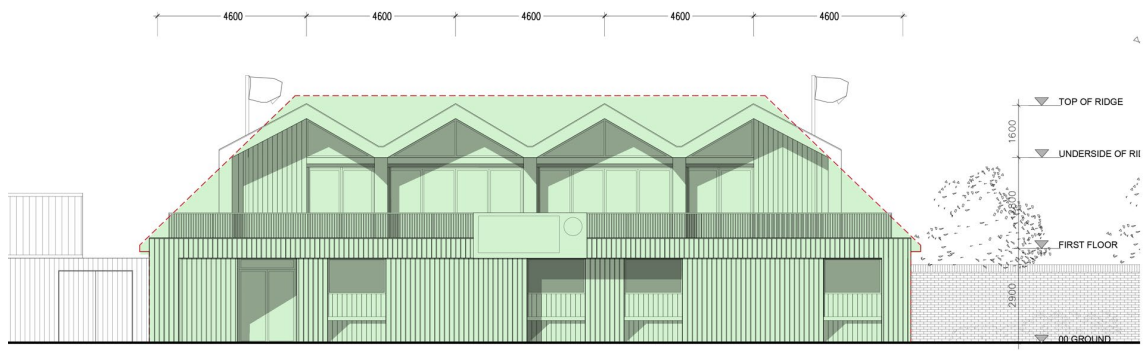
	Former Pavilion Volume (pre-fire)	Proposed Pavilion Volume	Net Difference
Ground Floor	635m <sup>3</sup>	783m <sup>3</sup>	+148m <sup>3</sup> (+23.3%)
First Floor	738m <sup>3</sup>	609m <sup>3</sup>	-129m <sup>3</sup> (-17.5%)
<b>Total (combined floors)</b>	<b>1,373m<sup>3</sup></b>	<b>1,392m<sup>3</sup></b>	<b>+19m<sup>3</sup></b> <b>(1.4%)</b>

- 3.6 The proposed pavilion building has a wider width than the former pavilion, however, the footprint of the proposed pavilion extends into the former building's terrace (hard standing) resulting in a reduction to the overall developed area comprising of a decrease of 1.63% (Table 3.1 and Figure 3.2).



**Figure 3.2: Proposed ground floor layout. Dashed red line indicates the footprint of the former pavilion building.**

- 3.7 The volume of the new pavilion would amount to an increase of 19m<sup>3</sup> (an increase of 1.4%) (Table 3.2). This would result in a slight reduction in the physical openness of the Site. The change in scale is modest, and is required to make the facilities fit for purpose, introducing improved amenities which would ensure the longevity of the Site for community use. Furthermore, the siting of the building on the former pavilion footprint would help mitigate changes in physical openness.
- 3.8 Policy LP13 of the London Plan, states that ‘*Appropriate uses within Green Belt or Metropolitan Open Land include public and private open spaces and playing fields, open recreation and sport*’. The Site is an established cricket club. The permanent facilities are ancillary to the use of the land for sport and enable the cricket club to continue to function in its current location.
- 3.9 There would be a very minor permanent impact on the visual openness of the Site due to the introduction of larger built form (volume) within the Site which would slightly increase the containment of views across the Site. The form of the proposed roofscape would reduce the overall height of the building compared to the former pavilion, as demonstrated by the architect’s scale and massing illustration (Figure 3.3). The design of the roof would be more articulated, breaking up the bulk and mass of the building compared to the previous pavilion, and potentially opening up views to the townscape beyond in localised areas.



**Figure 3.3: Excerpt from scale and massing exercise produced by AROS Architects. Dashed red line/green shading shows the former pavilion massing against the proposed building.**

- 3.10 Due to the siting of the proposed building on the footprint of the previous pavilion and marginally lower height of the proposed pavilion compared to the former building it is considered that the proposals would not be visually intrusive and would not sever or disrupt any views through the Site. In some cases, the proposed building would improve views (where the articulated roof form reduces the perceived mass and opens up views to the townscape beyond), therefore the general visual openness of the wider MOL would be preserved.
- 3.11 The proposals will result in a slight increase in built form on the Site which will affect the physical openness of the Site. However, sympathetic siting, design of the roofscape and scale of the pavilion has been adopted to ensure that any effect is reduced whilst also considering other site constraints. The location of the pavilion on the former pavilion footprint is logical and means that the new development will be kept to the edge of the Site (thus leaving the main body of the Site open). Whilst it is considered that the proposals will reduce the physical openness of the Site, this is considered to be of very low magnitude due to the adopted siting, and design of the proposals.
- 3.12 When considering the application against the MOL criteria within Policy G3 of the London Plan, the Site with the Proposed Development would continue to perform strongly against criterion 2. There would be permanent, very minor, local impacts on the Site's performance against criterion 1, albeit the Site is still distinguishable from the built-up area. The permanent application would not change the contribution of the Site to criterion 3 and 4.

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