

The Royal Parks

**Roehampton Restored,
Richmond Park
Planning Statement**

Final report

Prepared by LUC

July 2024



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Roehampton Restored, Richmond Park Planning Statement

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Chapter 1

Introduction

Purpose of this Application

1.1 This Planning Statement has been prepared by LUC on behalf of the applicant, The Royal Parks ('TRP'), to support an application made to the London Borough of Richmond upon Thames ('LBRuT' or 'the LPA') for the 'Roehampton Restored' scheme. The application site is at Roehampton Gate Café, in Richmond Park, Richmond.

1.2 Full planning permission is sought for the demolition of the existing buildings on site and the replacement of the temporary café building, cycle hire and toilet block buildings with a sustainable and sympathetically designed purpose-built café, and a separate building incorporating the cycle hire facilities and public toilets. The proposed scheme is landscape-led and incorporates changes to the access and road layout to facilitate a more pedestrian and cyclist friendly environment. It also includes a new pedestrian access gate into the park from the Alton Estate.

1.3 The description of development is:

“Demolition of existing buildings, revision to site entrances and layout, construction of new café, public toilets and cycle hire building, associated hard and soft landscaping, and a new pedestrian access gate on the park boundary”

1.4 The Royal Parks is the charity which cares for London's eight historic Royal parks and other exceptional green spaces across the city. The charity was formed in 2017 and is tasked with managing, protecting and improving the 5,000 acres of parkland in an exemplary and sustainable manner so that everyone, now and in the future, can enjoy their natural and historic environments. The eight Royal Parks are: Hyde Park, Kensington Gardens, St. James's Park, The Green Park, The Regent's Park and Primrose Hill, Greenwich Park, Richmond Park and Bushy Park. The charity also manages other important public spaces in the city, including Brompton Cemetery in West London, and Victoria Tower Gardens in the heart of Westminster.

1.5 This application is submitted following formal pre-application discussions with officers at LBRuT over a period of three years. Furthermore, TRP consulted with stakeholders via virtual engagement sessions held in February and March 2024. Engagement with the public and local neighbours also

took place over three public engagement sessions in different locations in Richmond Park in April 2024.

Supporting Documents

1.6 The planning application is accompanied by the following documents and planning applications:

- Application Forms, CIL Forms and Ownership Certificates
- Site Location Plan
- Package of plans
- Design and Access Statement
- Planning Statement including details of Community Engagement (this document)
- Biodiversity Net Gain Assessment
- BREAAAM Pre-Assessment
- Construction Management Statement
- Delivery and Servicing Plan
- Energy Statement
- Fire Safety Strategy
- Statement on Sustainable Drainage Systems
- Green/Brown Roof Details
- Historic Environment Assessment (including Archaeological Statement)
- Landscaping Scheme
- Open Space Assessment (including Very Special Circumstances case)
- Odour Assessment Report
- Preliminary Ecological Appraisal
- Sustainable Construction Checklist
- Transport Statement
- Travel Plan Statement
- Arboricultural Impact Assessment and Method Statement and Tree Protection Plan
- Verified Views

- Chapter 2 provides information on the application site and its surroundings, and the wider context of Richmond Park;
- Chapter 3 provides details of the pre-application discussions with the LPA and community engagement;
- Chapter 4 describes the proposed development;
- Chapter 5 sets out the national, regional and local planning policy context and other material planning considerations;
- Chapter 6 confirms the principle of development with respect of the site's location and appraises the proposed development against the relevant planning policies with respect to technical considerations; and
- Chapter 7 summarises the Statement.

Structure & Content of this Report

1.7 This Planning Statement describes the application proposals and provides an assessment of the proposed development in the context of relevant national, regional and local planning policy and other material considerations.

1.8 Following the introduction to the project, this report is structured as follows:

Chapter 2

Site and Surroundings

Richmond Park Context

2.1 Richmond Park is the largest of the Royal Parks, extending to over 950 hectares. It is situated in south-west London in the Borough of Richmond upon Thames and represents both a historic and city park.

2.2 It is London's largest Royal Park, extending to 950 hectares and is located within a conservation area and is a Grade I Registered Park and Garden. It forms part of a network of green and blue spaces across London, linking landscapes and acting as stepping stones for the movement of wildlife. The park is characterised by its mosaic of habitats, protected species and opportunities for enjoyment and recreation. Since enclosure by Charles I, it has first and foremost been – and remains - a deer park.

Designations

2.1 Richmond Park is subject to a number of statutory designations due to its ecology, landscape and built environment.

2.2 The park is of national and international importance for wildlife conservation, reflected in its status as a Site of Special Scientific Interest (SSSI), a National Nature Reserve (NNR), and Special Area of Conservation (SAC). These designations recognise the ecological importance of the park, with ancient trees and dead wood habitats for example, which support a wide range of invertebrates. Richmond Park also supports the most important area of lowland acid grassland in the Greater London region. Further to this, the park's designation as a NNR highlights its importance as a recreational resource for the London area. The SAC designation relates to the population of Stag Beetles supported on the site, which are considered to be a globally threatened species, and are listed as a priority species in the UK Biodiversity Action Plan. The park is also designated as Metropolitan Open Land.

2.3 Richmond Park is also a nationally significant historic landscape, which is reflected in its Grade I listing on the Historic England Register of Parks and Gardens of Historic Interest. There are 11 listed building entries for Richmond Park, including Ham Gate Lodge, Richmond Gate, and the boundary walls, which are Grade II listed due to special architectural and historic interest. The park character, which is of fluidity, informality, and semi-naturalness attributed to centuries of parkland and deer park management, contributes

to Richmond Park's significance for nature, whilst the 'designed' landscape such as the Isabella Plantation driven by Royal associations and patronage contribute to the park's Grade I listing.

The Application Site

2.4 The application site comprises the area of Roehampton Gate Car Park and Café, which consists of formal laid out parking on tarmac and informal parking on gravel, a café building with an adjacent outdoor kiosk and outdoor seating, a separate cycle hire building and two temporary modular toilet building located to the south of the site. The cafe, kiosk and bicycle hire buildings are located close to the car park entrance from Priory Lane, but the toilets are to the south in the car park.

2.5 The Royal Parks has identified the facilities as being a priority for redevelopment due to the poor condition and temporary nature of the existing buildings.

2.6 The application site is located on the north-east edge of the park, close to Roehampton Gate. Alton Primary School is located immediately to the north-east beyond the site boundary and the Richmond Park Golf Course is located to the south-east. The car park within which the existing café is set, is separated from the park by Priory Lane which forms part of the network of roads within the park, giving access to the car parks and forming a circular route for cyclists. The site also provides access onto the Tamsin Trail, a dedicated off-road circuit around the park.

2.7 The existing café building was originally located in St James' Park and was transported to Richmond Park as a temporary solution following a fire in 2004, which burnt down the original Pavilion restaurant and clubhouse. The replacement building was significantly smaller than the Pavilion but given strict Government spending and budget cuts at the time, was the only available option. A temporary toilet block was also brought onto the site after the fire. The history of the café is set out in the 'History' section below.

2.8 The application site includes the following environmental, planning policy and historic designations:

- Registered Park and Garden
- Conservation Area
- Metropolitan Open Land
- National Nature Reserve
- Special Area of Conservation
- Site of Special Scientific Interest
- Archaeological Priority Zone

History

2.9 The existing café building was only ever intended to be a temporary solution following an original restaurant (known as the Pavilion Restaurant) and golf club house (serving the Richmond Park Golf course) burning down in 2004.



Figure 1: The original Pavilion Restaurant and Club House

2.10 The former Pavilion Restaurant and club house were one building (as shown in Figure 1) which was accessible from both the park and the golf course and as well as a restaurant/café it provided toilet facilities for visitors. A golf pro shop, a separate building, also previously occupied an area within the same parcel of land.

2.11 Following the fire, the existing café building was brought onto the site as a temporary solution to ensure food and drinks could still be served at the site. Given the temporary nature of this building, it has now come to the end of its useable life and is no longer fit for purpose. This is covered in more detail below.

2.12 Temporary toilet facilities (those which currently serve visitors to the existing café and wider park) were also brought onto the site following the fire. Rather than being located with the current café, they were located closer to where the burnt down restaurant stood to make use of existing utilities.

2.13 As the popularity of cycling increased, particularly with the introduction of the Tamsin Trail (a perimeter track around Richmond Park) the existing cycle hire buildings were located adjacent to the existing café building.

2.14 Today, only the existing café, cycle hire and toilet buildings are in existence. The burnt down Pavilion Restaurant and golf club house, as well as the golf pro shop, have all been removed from this parcel of land.

2.15 This background is especially relevant to the MOL assessment which is detailed in the MOL Assessment report prepared by LUC. The Historic Environment Assessment prepared by LUC considers the history of the site further.

Planning History

2.16 The planning history of the site is set out in Table 2.1. This includes an application for the installation of pay and display parking machines and signage which was then withdrawn in 2010. In 2011, two planning application for the new clubhouse at Chohole Gate and demolition of existing modular buildings at Roehampton Gate were approved.

2.17 An application was made in 2012 and approved in 2014 for refurbishment works and an extension to the café building. The Officer report noted that the proposals were considered modest in scale and compatible with the design and appearance of the Richmond Park Conservation Area. They would have no adverse impact on the open character and function of the MOL and POS and would safeguard the biodiversity of the SSSI.

Table 2.1 Planning History

Reference	Description	Status
10/1193/FUL	The proposed development consists of the installation of pay & display parking machines, ancillary signage, and wooden bollards at seven of the car parks at Richmond Royal Park (Sheen Gate, Roehampton Gate, Robin Hood Gate, Broomfield Hill, Kingston Gate, Pembroke Lodge and Pen Ponds).	Withdrawn 12.07.2010
10/3768/FUL	Construction of new clubhouse at Chohole Gate, including reception, foyer, shop, cafe, clubrooms, and changing facilities approximately 756 sq m. New carpark providing approximately 164 spaces, 20 bay driving range (non-floodlit) approximately 100 sq m	Approved 07.12.2011
11/0054/CAC	Demolition of the existing modular buildings at Roehampton Gate following the construction of the new Golf Clubhouse Buildings at Chohole Gate as per Application No. 10/3768/FUL	Approved 10.01.2011
12/3605/FUL	Removal of existing front doors and windows and replacement with a timber-framed glazed shopfront, formation of a timber fence storage extension at the rear and installation of three eaves roof windows in the existing location of the windows in the north elevation.	Approved 06.08.2014

Chapter 3

Pre-Application Engagement

3.1 This Chapter sets out details of the formal discussions that have taken place with the LPA, the London Borough of Richmond upon Thames; and the applicant’s public and community engagement activities and feedback received.

3.2 Formal pre-application requests were made to the LPA in July 2021 and March 2023.

July 2021 Pre-Application Discussions

3.3 Pre-application advice was requested from officers at LBRuT in July 2021 (ref. 21/P0203/PREAPP). This July 2021 scheme was materially different to the application scheme. Feedback was sought from officers for the principle of the redevelopment of the café and the justification for the building in Metropolitan Open Land (‘MOL’). A written response was received in November 2021 and this is set out in Table 3.1 alongside our response, focusing on the Metropolitan Open Land aspects of the development.

3.4 Following the receipt of the advice, The Royal Parks revised the proposals and developed a proposal with a smaller built footprint, with a lower height, set back from Priory Lane. In order to show the evolution of the proposed development.

Table 3.1 Pre-Application Comments Summary

Comment	Response
<p><u>Bicycle rental</u></p> <p>With respect to the bicycle rental facility, clarification on the existing floorspace, plans and elevations are required to make an informed judgement as to whether the scheme meets the exception at Paragraph 149(d) for replacement of a building providing the building is in the same use and not materially larger.</p>	<p>Further details were submitted with the subsequent pre-application request.</p>
<p><u>Toilets</u></p> <p>Plans and elevations will also be required as to determine whether the proposed public toilets are materially larger than the existing. There is policy support for access to toilet facilities (Policy LP30 of the LBRuT Local Plan and Policy S6 of the London Plan).</p>	<p>The policy support is noted. Further plans and elevations were submitted with the subsequent pre-application request.</p>
<p><u>Café</u></p> <p>A café is an inappropriate use within MOL. The proposed increases in footprint, height and volume of the building are substantial and do not meet exception (c) or (d) of para 149. The harmful visual and spatial impact of the development on openness is further exacerbated by the proposed canopies to</p>	<p>Further design work has taken place since the 2021 pre-application comments were received, which have reduced the footprint, volume and height of the building. A MOL assessment is included within this submission to fully justify the scheme in the context of MOL policy.</p>

Comment	Response
<p>the external seating areas and likely further clutter associated with outdoor seating for a café use, noting the intention to accommodate over 120 covers externally. The notion of a ‘destination café’ in itself conflicts with MOL policy as any café should be ancillary to the use of the park and not a destination in itself. Operational hours and the intended uses should be clearly outlined.</p>	
<p><u>Flexible community and education space</u></p> <p>The flexible community and education space is not an appropriate use in MOL, does not meet any of the exceptions, and should be removed.</p> <p>The supporting statement indicates that the increased size of the scheme may be justified as they replace a larger café/clubhouse destroyed by fire in 2004. The LPA do not consider that any weight can be afforded to floorspace and building volume which has not existed on the site for over 15 years.</p> <p>It is further noted that the clubhouse has already been replaced at Chohole Gate in accordance with the Government’s Jenkins Report, granted planning permission under reference 10/3768/FUL and this floorspace would not be double-counted in justifying this proposal. The documents submitted with that application and Officers Report stated that the increase in development would be partly offset by the demolition of certain existing structures including the then existing approx. 390sqm clubhouse.</p>	<p>This element of the scheme has been removed from the submitted application.</p> <p>It has since been confirmed by the LPA in the second pre-application response (see Table 3.2) that the Pavilion Restaurant and Golf Club House should be considered as the original building and therefore the proposed scheme should be regarded as a replacement of that building.</p> <p>It was accepted that it was the former Golf Pro Shop accounted for in the Chohole Gate planning application, not the Pavilion Restaurant and Golf Club House.</p> <p>The proposed café is considered to be of a similar enough use to the Pavilion Restaurant that it would be acceptable in principle (in the context of MOL planning policy). However, the Golf Clubhouse would not be the same use as the proposed scheme and would not therefore be considered as part of the quantum for any replacement of the restaurant with a café.</p>
<p><u>Very Special Circumstances</u></p> <p>It is strongly recommended that any future application be accompanied by a standalone VSC statement. Whilst the replacement of the existing floorspace and building volume may be justified, no justification has been provided for the significant increase in built form proposed. The benefits that accrue from the revised access and parking layout, and pedestrian access to the Alton Estate do not appear to be dependent on the substantial increase in scale of the development proposed.</p>	<p>The planning application is accompanied by a standalone MOL/VSC Statement prepared by LUC.</p>

March 2023 Pre-Application Discussions

3.5 A further pre-application request was made in March 2023 (ref. 23/P0048-PREAPP), presenting an amended scheme to Officers which sought to respond to the feedback

received in 2021, and provided further information on the site’s location and the case for its development on Metropolitan Open Land. Following receipt of written advice in June 2023, the application scheme was developed further by David Morley Architects.

Table 3.2 Summary of Pre-Application Comments ref. 23/P0048-PREAPP

Comment	Response
<p><u>Metropolitan Open Land</u></p> <p>The proposed cycle hire/toilet provision is appropriate in so far as they support the outdoor sport and recreation use. However, as the proposal is larger than the original it does not meet the tests of preserving openness.</p>	<p>A MOL/VSC Statement supports the planning application.</p> <p>A number of the key points put forward for the case for Very Special Circumstances are recognised, including the need for a replacement café, however officers have set out where they would like to see further detail and supporting evidence to support the</p>

Comment	Response
<p>Likewise, the development is not an exception to inappropriate development under NPPF Paragraph 149(d). The increase in size is considered to be materially larger. Given this, it is considered that a case for very special circumstances would be required for this element of this proposed development.</p> <p><u>Very Special Circumstances</u></p> <p>As the proposals are not considered to be an exception to inappropriate development, a case for VSC would need to be submitted. A preliminary VSC assessment has been assessed. It is recommended the VSC case includes quantitative analysis and visual depictions of how minimal the harm would be.</p> <p>It has been shown there is a need for a replacement café and other facilities, however it is not clear there is a need for it to be materially larger than the built footprint of the original building.</p> <p>The justification for the proposal would be in the need for long term café solution and provision for baby changing and disability facilities.</p> <p>It has not been established why there is a need for the building to be larger other than it would be desirable. Indoor seating is considered desirable and not a need.</p> <p>Replacement buildings would be suitable given the temporary nature of the existing buildings, however it has not been established why there is a need for the building to be larger other than it would be desirable.</p> <p>A detailed review to confirm there aren't any other locations the proposal could go outside of the MOL would be helpful. In terms of the increased demand and the catering facilities the proposed development would provide, it would be useful to know that these cannot be addressed anywhere outside of the MOL.</p> <p>A full list of benefits would need to be provided. The following headings could be considered when drafting a VSC case:</p> <p>Critical Factors:</p> <ul style="list-style-type: none"> • Harm to MOL • Need for the proposal • Location <p>Other Factors:</p> <ul style="list-style-type: none"> • Minimum specification for the use • Character of MOL • Measures taken to reduce the impact of the proposals on openness • Local MOL Policy Considerations • Benefits 	<p>argument for the café being larger and to successfully demonstrate that the Very Special Circumstances would outweigh the harm as a result of the scheme being materially larger than the original building. This further detail and evidence has been included within the MOL/VSC statement.</p>
<p><u>Design and Impact on Heritage Assets</u></p> <p>Richmond Park is a designated Conservation Area and a Grade I Listed Historic Park and Garden. In terms of character and openness, as there is an increase in scale over the existing situation, the Heritage Report states that further studies will need to be carried out to ensure that the proposal sit comfortably within the character of this part of the Registered Park and Garden. It will be important to present an analysis of before and after views. Any application should be accompanied with existing and verified views for comparison.</p>	<p>It is recognised that the current scheme represents a reduction in scale and footprint in comparison to the previous pre-application scheme, reducing the visual impact on the Park, and it is considered that the combination of design and materials now proposed would be appropriate to the landscape setting of Richmond Park.</p> <p>It is recognised that the proposed height reduction now keeps the proposed buildings effectively below the tree line, to give an 'enclosed by the landscape' setting. Officers are of the view that the overall design</p>

Comment	Response
<p>The overall scale of the proposals and footprint has been reduced following comments on the last pre-app and this reduces visual impact on the setting of the park. The proposed height reduction also now keeps the proposed buildings effectively below the tree line.</p> <p>The combination of design and materials proposed is considered appropriate to a landscape setting in Richmond Park. The palette of materials is considered appropriate.</p> <p>It is considered the footprint and height issues which were previously flagged have been vastly improved. Verified views should be provided for comparisons to the existing situation.</p>	<p>has benefited from the proposed lowered roof level and footprint, the proposals now being within the height of the background tree line. Furthermore, they recognise that the building element has been pushed back, allowing a major existing tree to be retained as a feature to the front of the development</p> <p>Verified views have been included in the planning submission.</p>
<p><u>Landscaping</u></p> <p>A detailed landscape proposal would be needed for any future planning application. It will be very important to avoid urbanising the site with too much road-orientated surfacing. The application would benefit from providing a detailed landscape scheme, including maintenance of the landscaping, up front.</p>	<p>A detailed Landscaping Plan prepared by TRP is submitted to support the application and demonstrate that the built element of the scheme is subservient to the landscaping.</p>
<p><u>Archaeology</u></p> <p>The application site is located within an Archaeological Priority Area. An Archaeological Statement will be a validation requirement.</p>	<p>The submitted Heritage Statement includes an assessment of the below ground cultural heritage assets including impact on archaeological remains.</p>
<p><u>Residential Amenity</u></p> <p>The Alton School borders the site to the north and east. The nearest residential receptor appears to be the school keeper's bungalow at the Primary School and the Club House Flat at the Roehampton Gate Equestrian Centre. Roehampton Gate itself has a residence. Given the separation distance it is unlikely that the scheme would be considered harmful to amenity through visual intrusion or loss of light.</p> <p>BREEAM requires a Noise Assessment given presence of noise sensitive locations within 800m of the site.</p>	<p>A BREEAM pre-assessment supports the planning application indicating where credits will be achieved towards an 'Excellent' certification.</p>
<p><u>Transport</u></p> <p>The car park entrance relocation from the centre of the site to the north of the site will allow the free movement of cars in and out of the car park while reducing the overlap with cyclists and pedestrians.</p> <p>The intention to provide a net increase of 16 short-stay cycle parking spaces is supported.</p>	<p>The revised vehicle access point to parking and the improved access to the Alton Estate are seen as positive. The Transport Statement prepared by Stantec provides further details.</p>
<p><u>Trees</u></p> <p>The site is located in the Richmond Park Conservation Area, which affords statutory protection to trees within and adjacent to the site. There are no TPOs within or adjacent to the site.</p> <p>Removal of existing trees and construction close to established trees on site would be resisted without appropriate design, protection and/or mitigation measures.</p> <p>Trees around the application site must be protected. The location and impact on trees of boardings and scaffolding should be considered.</p>	<p>Canopy Consultancy have undertaken a tree survey on the site to BS 5837:2012. An Aboricultural Impact Assessment and Method Statement report and a Tree Protection Plan accompanies this planning application.</p> <p>A full landscape scheme also supports the application.</p>

Comment	Response
<p>Any on-site tree planting specification and methodology must include soil volume calculations and incorporate root deflection measures where necessary.</p> <p>Site specific foundation design and hard surfacing details are required.</p> <p>A hard and soft landscaping plan is required, alongside full details of hard and soft landscaping works.</p> <p>A tree survey to BS5837:2012, Arboricultural Impact Assessment and Arboricultural Method Statement should be submitted.</p>	
<p><u>Ecology, Biodiversity and HRA</u></p> <p>The site is designated as a Special Area of Conservation for the stag beetle and it is also a site of national importance for the conservation of the fauna of invertebrates associated with the decaying timber of ancient trees.</p> <p>The Ecological Impact Assessment should consider whether suitable veteran trees or decaying wood habitat are found within or immediately adjacent to the red line.</p> <p>The application should be accompanied by a landscaping scheme, details of external lighting, bat surveys, and a Construction Environmental Management Plan.</p> <p>The application should explain the consideration given to green roofs/walls and where proposed include a specification, details of species and proposed maintenance.</p>	<p>The submitted Ecological Impact Assessment addresses all matters raised in the pre-application advice.</p> <p>Protecting and enhancing ecological value has been central to the design of this landscape-led scheme.</p>
<p><u>Flooding and Drainage</u></p> <p>A Site Specific Flood Risk Assessment will be required in addition to a Statement on Sustainable Drainage Systems. The SuDS Statement will need to address the drainage hierarchy in the London Plan in detail. Further information is required regarding the use of rainwater harvesting features and infiltration testing will be required in order to comply with the London Plan Drainage hierarchy. Green and brown roofs are encouraged.</p>	<p>A Flood Risk Assessment including a section on the approach to SuDS has been prepared by Price & Myers and is submitted with the application.</p>
<p><u>Sustainability</u></p> <p>BREEAM 'Excellent' would need to be demonstrated. A Completed Sustainable Construction Checklist and Energy Report demonstrating the scheme achieves 35% carbon emissions reduction target beyond Part L 2021 of the Building Regulations will need to be submitted.</p>	<p>TRP aim to deliver a BREEAM 'Excellent' scheme to demonstrate their aim of significantly improving the quality of the built environment at Roehampton Gate. The Energy Statement prepared by Max Fordham demonstrates this and a BREEAM Pre-assessment has been prepared.</p>
<p><u>Waste</u></p> <p>The applicant is advised to provide suitable waste storage for a weekly collection, to minimise waste vehicle movements in/out of the park and have a lesser impact on local air quality and traffic conditions.</p>	<p>This is noted.</p>
<p><u>Fire Safety</u></p> <p>A Fire Safety Statement should be submitted as a separate document to address criteria in London Plan Policy D12 part A.</p>	<p>A Fire Safety Statement that responds to Policy D12 has been prepared and included in the submission.</p>

Public and Stakeholder Consultation

3.6 As the development proposal is not classed as a major development, there is no requirement for the applicant to conduct pre-application engagement with the community or stakeholders. However, TRP identified a need to engage proactively with key stakeholders on the designs. They consulted on the latest plans with stakeholders in February and March 2024, and with the public in April 2024.

Stakeholder Engagement

3.7 TRP identified a clear need to engage proactively with key stakeholders on the designs, provide opportunity for stakeholders to ask questions and provide feedback on the proposed plans.

3.8 Stakeholder consultation had previously taken place in November 2022, so the 2024 sessions were intended to show how the design had evolved since this session and the first round of pre-application advice received. Twenty-eight stakeholders attended two online briefing sessions, which included a presentation by members of the project team and a question-and-answer slot.

3.9 Stakeholders were broadly identified as being in one of the following three categories:

- Local voluntary or community organisations with a vested interest in Richmond Park, and in particular Roehampton Gate/Café.
- Members of Richmond and Wandsworth Councils and planning committees.
- Businesses within or around Richmond Park likely to be affected by the development.

3.10 The response to the revised plans was generally very positive. Some concerns were raised which fall under the following themes:

- Increased light pollution.
- Flow of movement around the site from different users – motorists, cyclists, and pedestrians.
- Impact on the Beverley Brook with increased visitation – action for Park Management team to include in their general management plans.
- Increased visitor numbers.
- Potential reduction in car parking space.
- Location of the gate to the Alton Estate and security.

3.11 Further to the session, the Friends of Richmond Park and the Richmond Society Landscaping & Riverside Committee attended a site visit which was positively received.

Public Consultation

3.12 The public consultation company, Mustard, were commissioned by The Royal Parks and organised three public engagement days in Richmond Park at Roehampton Gate Café and Pen Ponds. Exhibition boards were set up at these locations. Engagement with the public took the form of qualitative interviews and feedback during the engagement days.

3.13 The findings received from the consultation are set out in the Public Engagement Results document, and the key findings are replicated here:

- Visitors are positive about the restoration plans. The design is considered to be attractive and perceived to meet needs. Most (current visitors and prospect visitors) say they will visit the café and surrounding landscape when it opens.
- Most visitors agree the current café and area at Roehampton Gate requires attention. The toilets, crowds and congestion all need addressing to improve the experience for visitors.
- There is some concern that the area will become increasingly congested. Visitors seek reassurance that measures are in place to prevent this. The new access road, traffic calming measures, and increased seating inside help to mitigate this.
- In restoring the café and area, it is likely a new audience will visit. Families in particular are encouraged by improved facilities, a safer environment and opportunities for natural play.

3.14 Concerns raised by the public at these engagement days included an increase in congestion caused by the new café, and some who felt that the café does not need to change.

Chapter 4

The Proposed Development

Overview of the Proposals

4.1 The description of development is:

“Demolition of existing buildings, revision to site entrances and layout, construction of new café, public toilets and cycle hire building, associated hard and soft landscaping, and a new pedestrian access gate on the park boundary”

4.2 The key elements of the scheme are set out below:

- A permanent and upgraded café building, set within an inclusive landscape which is welcoming to all users.
- Public toilet facilities for park visitors and upgraded cycle hire building with better and safer connections onto the Tamsin Trail.
- Landscape and ecological enhancements, including tree planting, soft landscaping, biodiversity enhancements and more on-site water attenuation.
- Reconfiguration of the vehicle and cycle access to the site.
- A new pedestrian access gate into the park from the Alton Estate.

Use and Amount

4.3 The proposed development will include two buildings, replacing uses that already exist on the site; a café with internal and external seating and a separate kiosk facility; and a cycle hire facility and public toilets that will be available for all park users including out of hours.

4.4 The total GIA of the two proposed buildings is 446sq.m.

4.5 Each element of the proposal has been carefully considered so that the new facilities can function efficiently, comply with current regulations, and provide an appropriate service without being larger than is strictly necessary.

Café and Kiosk

4.6 The proposed replacement café building has been designed to address the current problems with the building and to cater for the existing number of customers. All of the proposed floor area provides a function in the building.

4.7 A catering kiosk is also proposed which is based on the recent successful kiosk developments by TRP.

4.8 The back of house and kitchen areas have been designed by the catering consultants to provide enough space to service the café and kiosk, and to comply with current health and safety and building regulations. The dry stores and cold stores have been designed to provide storage for both the Roehampton Gate Café and also the other catering kiosks around Richmond Park, which are serviced from this site.

4.9 A bin store is proposed adjacent to the building.

Bicycle Hire and Toilet Block

4.10 A proposed bicycle and toilet hire facility is proposed. The existing toilets are inadequate for the number of users so the proposed toilets have been designed to allow a greater number of WCs and urinals to be provided, ensuring that there are enough for both the café users and general park visitors. Two accessible toilets are proposed in addition to a baby change facility and a cleaning store room.

4.11 The proposed bicycle hire facility has been optimised to provide the minimum area required for the facility to operate effectively and is a reduction on the current area. This comprises a bicycle hire area and office.

Access and Parking

4.12 One of the key aims of the proposal is to improve the access arrangements around the site to provide a safer and more enjoyable experience for all park users. The café and car park is a popular meeting point for pedestrians and cyclists.

4.13 The proposal includes relocating the car park entrance from the centre of the site to the north end away from the pedestrian congregation areas. This will allow the free movement of cars in and out of the car park while reducing the overlap with cyclists and pedestrians.

4.14 The existing overflow parking area will be formalised with a tarmac road surface and gravel parking bays.

4.15 The creation of a pedestrian and cycle area at the heart of the design will improve safety at the site. The outside space adjacent to the café will link directly to the Tamsin Trail providing off-road cycle access to the wider park.

4.16 The proposal will result in a marginal decrease in car parking spaces, from 245 to 225. Two electric vehicle charging points will be included for the catering vehicle spaces.

4.17 The number of disabled parking bays has been increased from four to 14, with four outside the cycle hire building and 10 adjacent the café closest to the Tamsin Trail.

4.18 Cycle parking will be provided at the front of the café close to Priory Lane and the Tamsin Trail. It is intended to

provide a large number of lockable cycle parking spaces sensibly located in the context of the café, toilets and outdoor seating areas.

4.19 As key hub for visitors to Richmond Park, it is important that it operates in a way which provides a safe environment for all users. The park is very popular with cyclists and the Roehampton Gate area acts as a focal point for meeting, rest and refreshment. As such, improved cycle parking is proposed in sight of the kiosk.

4.20 A pedestrian link is proposed to the west of the site to connect Alton Estate via an accessible, deer-proof gate.

4.21 Level access is to be provided to all facilities. The ground around the building is generally quite flat so slopes will be incorporated into the landscaping to avoid the use of ramps, unless this is necessary. A Part M compliant Accessible WC is provided in the public toilet block as well as ambulant WC cubicles in both the male and female toilets.

Appearance and Materials

4.22 Two modest, timber clad buildings are proposed: one containing the café, kiosk and associated back-of-house areas, and a second containing the public toilets and bicycle hire facility. The two buildings are linked by a curving, timber framed canopy supporting a green roof, which defines the outdoor pedestrian area and provides shade and shelter.

4.23 The proposed replacement café building will have standing seam roof cladding which will accommodate photovoltaic panels. A green roof is proposed to the toilet and bicycle hire building which extends along the canopy to the café.

4.24 A palette of natural, attractive, and robust materials is proposed to ensure that the buildings blend into their environment and remain attractive in the long term. The buildings have been designed to be low-key and to sit quietly in their context.

4.25 The following materials are proposed:

- Timber
- Standing seam zinc
- Concrete
- Bricks and larch cladding for external walls
- Zinc roof and photovoltaic panels
- Green roof

Layout

4.26 The proposed buildings have been designed to meet the needs of the site and significantly reduce the spread of built form across the site. The two buildings are proposed to be linked via the canopy, which wraps around the south and west

sides of the café and extends across to the public toilets to the north-west. In addition to contributing to the aesthetic, the canopy will protect external seats from weather and provide a sheltered route from the café to the toilets.

4.27 The reconfiguration of the access point from the centre of the site at the west of the existing café building to the north of the site allows for a layout that prioritises pedestrian and cyclists. The setting of the café building and cycle hire building are also set in the landscape.

4.28 The overflow car parking area where the existing toilet building is located will be formalised with a tarmac surface and gravel parking bays.

Landscaping

4.29 The scheme is landscape-led in order to improve this area of the park in line with wider Management Plan objectives. The Proposed Development aims to enhance the landscape setting of the site and the wider park and provide a safe outdoor area for visitors to congregate.

4.30 The buildings are carefully positioned in relation to the existing landscape, particularly the existing veteran trees on the site, and positioned to create a new pedestrian space between the buildings and Priory Lane, screened from the existing car park.

4.31 Parkland will be restored to provide a setting for the café using native trees, shrub and ground flora and acid grassland to create a strong connection between the café and the park. Infrastructure will be moved from the root protection areas of the veteran trees in order to better improve their longevity. The key elements of the landscape scheme include:

1. Vehicular access: re-orienting the main access road, improving car parking and service access.
2. Cycle Routes: managing cycle routes through the site, from the Tamsin trail and main road, and providing improved cycle parking and gathering spaces.
3. Pedestrian circulation: improved space around the café for seating, improved toilet facilities, and safer crossing points at the main road.
4. Natural play: opportunities for natural play will be provided across the road towards the Beverly Brook
5. Swales: a long swale along the main road increases opportunities for water collection, retention, and attenuation as well as improves site-wide biodiversity.
6. Planting: enhanced tree, shrub, hedgerow and grassland planting for habitat improvement, screening and framing views.
7. Materials: Natural materials are proposed to be used, including gravel, and the use of tarmac limited.

Scale and Massing

4.32 The new buildings have been designed to be of a similar scale to other ancillary buildings located within the Royal Parks. They will be single storey with an extensive area of flat green roof covering the cycle hire and toilet building and the link canopy.

4.33 The café roof comprises a pitched standing seam roof to provide a more generous space and serve a design function. The café roof also accommodates a plant enclosure above the back-of-house facilities which will be screened with vertical cladding.

4.34 The roofs will have a consistent eaves level which will give a human scale to the buildings. The roof level of the toilet and cycle hire building will be 3.45m above ground level and the pitched roof over the café seating area will rise to a maximum of 5.6m, providing a more generous space inside.

4.35 The Gross External Area of the proposed development will be 504sq.m.

Sustainability

4.36 The proposal has been designed to provide highly sustainable buildings which target BREEAM 'Excellent'. A fabric first approach will be employed to ensure a highly insulated and airtight external envelope. Green roofs are proposed as well as rainwater harvesting for use in WCs and for bicycle cleaning as well as solar photovoltaics.

4.37 The buildings have also been designed to provide solar shading by including rooflights and sun pipes and prevent overheating by including overhanging eaves. It would also switch from the existing use of calor/tank gas to electricity and air source heating.

4.38 The Energy Statement prepared by Max Fordham provides further details and Section 5 appraises the sustainability and energy performance against planning policies.

Refuse and Servicing

4.39 A bin store is proposed at the back of house area,

4.40 A delivery area is provided to the rear of the café. The access configuration has been designed to ensure that there is adequate access for deliveries, bin lorries and vehicles associated with events and filming. Two parking spaces with electric vehicle parking spaces have been provided at the rear of the café for electric catering vehicles.

Chapter 5

Planning Policy Context

Overview

5.1 The proposed development has taken account of relevant national, regional and local planning policy. This section of the Planning Statement sets out a brief summary of the relevant planning policy documents and the following chapter seeks to demonstrate compliance with these policies.

5.2 In accordance with Section 38(6) of The Planning and Compulsory Purchase Act (2004), planning applications should be determined in accordance with the development plan unless other material considerations indicate otherwise.

5.3 The development plan comprises:

- The London Borough of Richmond upon Thames Local Plan Review 2015-2018 ('Local Plan') (adopted in July 2018)
- The London Plan (adopted in July 2021)

5.4 Other material considerations include the following:

- National Planning Policy Framework (December 2023)
- National Planning Practice Guidance (launched March 2014 and updated regularly)
- Richmond's Supplementary Planning Documents and Supplementary Planning Guidance
- Emerging Local Plan policy

The Development Plan

London Borough of Richmond upon Thames Local Plan Review 2015-18 (adopted July 2018)

5.5 The Local Plan sets out the vision, spatial strategy and development management policies for the Borough until 2033. The key policies which are relevant to this proposal include:

- Policy LP 1 Local Character and Design Quality
- Policy LP 2 Building Heights
- Policy LP 3 Designated Heritage Assets
- Policy LP 4 Non-Designated Heritage Assets
- Policy LP 5 Views and Vistas
- Policy LP 7 Archaeology
- Policy LP 8 Amenity and Living Conditions

- Policy LP 10 Local Environmental Impacts, Pollution and Land Contamination
- Policy LP 12 Green Infrastructure
- Policy LP 13 Green Belt, Metropolitan Open Land and Local Green Space
- Policy LP 15 Biodiversity
- Policy LP 16 Trees, Woodlands and Landscape
- Policy LP 17 Green Roofs and Walls
- Policy LP 20 Climate Change Adaption
- Policy LP 21 Flood Risk and Sustainable Drainage
- Policy LP 22 Sustainable Design and Construction
- Policy LP 28 Social and Community Infrastructure
- Policy LP 29 Education and Training
- Policy LP 30 Health and Wellbeing
- Policy LP 31 Public open space, play space, sport and recreation
- Policy LP 40 Visitor Economy
- Policy LP 44 Sustainable Travel Choices
- Policy LP 45 Parking standards and Servicing

The London Plan

5.6 The current London Plan was adopted in 2021 and sets out the spatial development strategy for Greater London, providing a framework for the development and use of land over the next 20-25 years.

5.7 The key London Plan policies which are relevant to this proposal are:

- Policy GG1 Building strong and inclusive communities
- Policy GG2 Making the best use of land
- Policy GG3 Creating a healthy city
- Policy GG6 Increasing efficiency and resilience
- Policy D4 Delivering good design
- Policy D5 Inclusive design
- Policy D8 Public realm
- Policy D12 Fire safety
- Policy D14 Noise
- Policy S1 Developing London’s social infrastructure
- Policy S5 Sports and recreation facilities
- Policy S6 Public toilets
- Policy HC1 Heritage conservation and growth

- Policy HC3 Strategic and Local Views
- Policy G1 Green infrastructure
- Policy G3 Metropolitan Open Land
- Policy G6 Biodiversity and access to nature
- Policy G7 Trees and woodland
- Policy T5 Cycling
- Policy T6 Car parking
- Policy T6.4 Hotel and leisure uses parking
- Policy T7 Deliveries, servicing and construction

Other Material Considerations

National Planning Policy Framework

5.8 The latest National Planning Policy Framework (‘the Framework’) was published in 2012 and was most recently revised in December 2023. The Framework provides guidance and is a material consideration for local planning authorities in the determination of planning applications.

5.9 The Framework confirms that the purpose of the planning system is to contribute to the achievement of sustainable development. At the heart of the Framework is a presumption in favour of sustainable development, which for decision-taking means approving development proposals that accord with an up-to-date development plan without delay (Paragraph 11).

National Planning Policy Guidance

5.10 The Planning Practice Guidance is a web-based resource created by the former DCLG and launched in March 2014. The PPG are updated regularly and provide further guidance to the Framework for decision makers. The PPG is a material consideration.

5.11 The UK Government published guidance on the role of the Green Belt in the planning system on the 22 July 2019 (last updated 19 December 2023). Paragraph 001 confirms that 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. The courts have identified a number of matters which may need to be taken into account in making the assessment which include, but are not limited to:

“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.”

Supplementary Planning Documents

5.12 Other key material considerations include Richmond’s adopted Supplementary Planning Documents:

- Air Quality SPD (adopted June 2020)
- Design Quality SPD (adopted February 2006)
- Development Control for Noise Generating and Noise Sensitive Development SPD (adopted September 2018)
- Refuse and Recycling Storage Requirements SPD (adopted December 2022)
- Sustainable Construction Checklist SPD (adopted January 2016)
- Transport SPD (adopted June 2020)

Supplementary Planning Guidance

5.13 Richmond has Supplementary Planning Documents including the Conservation Areas SPG; Nature Conservation and Development SPG; and Planning Guidance for Food and Drink Establishments. The latter covers noise control and ventilation and odour control.

Chapter 6

Planning Appraisal

Introduction

6.1 This Chapter of the Planning Statement identifies the relevant national and local planning policies and appraises the proposed development against these policies and any other material considerations.

6.2 The following considerations are set out in the Chapter.

- Principle of Development
 - Overarching policy
 - Metropolitan Open Land
 - Very Special Circumstances
- Amenity
- Design and Layout
- Ecology and Biodiversity
- Energy Efficiency
- Drainage
- Fire Safety
- Historic Environment
- Trees and Landscaping
- Waste Management

Principle of Development

Relevant Policy

6.3 Policy LP 28 Social and Community Infrastructure states that proposals for extensions to existing social and community infrastructure will be supported where it provides for an identified need; it is of high quality and inclusive design providing access for all; and where practicable is provided in multi-use, flexible and adaptable buildings or co-located with other social infrastructure uses which increases public access.

6.4 Policy LP30 Health and Wellbeing state that the Council will support development that results in a pattern of land uses and facilities that encourage sustainable modes of travel; access to green infrastructure and local open spaces; access to local community facilities; access to local healthy food; access to toilet facilities which are open to all in major developments where appropriate; an inclusive development

layout and public realm that considers the needs of all; and Active Design which encourages wellbeing and greater physical movement as part of everyday routines.

6.5 London Plan Policy G3 Metropolitan Open Land states that Metropolitan Open Land is afforded the same status and level of protection as Green Belt and should be protected from inappropriate development.

6.6 Section 13 of the NPPF confirms the purpose of including land in the Green Belt (Paragraph 143). The national planning policy tests that apply to the Green Belt are outlined below.

6.7 Paragraph 152 confirms that,

“Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances”.

6.8 Paragraph 153 confirms that local planning authorities should ensure that substantial weight is given to any harm to the Green Belt and that:

‘Very special circumstances’ will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.

6.9 Paragraph 154 lists the different types of development that are considered to be exceptions to inappropriate development:

- a) buildings for agriculture and forestry;
- b) the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it;
- c) the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;
- d) the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;
- e) limited infilling in villages;
- f) limited affordable housing for local community needs under policies set out in the development plan (including policies for rural exception sites); and
- g) limited infilling or the partial or complete redevelopment of previously developed land,

whether redundant or in continuing use (excluding temporary buildings), which would:

- not have a greater impact on the openness of the Green Belt than the existing development; or
- not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority.”

6.10 Paragraph 155 of the NPPF lists certain other forms of development that are not considered inappropriate in the Green Belt, provided they preserve the openness and do not conflict with the purposes of including land within it:

- a) mineral extraction;
- b) engineering operations;
- c) local transport infrastructure which can demonstrate a requirement for a Green Belt location;
- d) the re-use of buildings provided that the buildings are of permanent and substantial construction;
- e) material changes in the use of land (such as changes of use for outdoor sport or recreation, or for cemeteries and burial grounds); and
- f) development, including buildings, brought forward under a Community Right to Build Order or Neighbourhood Development Order.

Appraisal

6.11 The proposed development should not be viewed as a stand-alone café/toilet/cycle-hire development. Rather, it is a critical piece of visitor infrastructure serving a Royal Park, one of the most important green open spaces in London. A need for replacement has been clearly identified, along with a need to make significant landscape improvements to this area of the park so that it is befitting of its Royal Park status and the historical and ecological designations attached to it.

6.12 The proposed scheme will facilitate more inclusive access to the park and provide for the need of visitors in a way which the existing development on site does not.

6.13 In the context of Policy LP 29 and LP 30, the principal of this development is considered acceptable.

6.14 The MOL Assessment which accompanies this planning application provides a detailed explanation of the scheme in the context of Metropolitan Open Land planning policy.

6.15 The scheme comprises two separate but intrinsically linked buildings, the cycle hire and toilet building, and the café building. The MOL Assessment report confirms which

exceptions the proposed development is considered to fall within:

- Exception (b) of Paragraph 154: the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it; and
- Exception (d) of Paragraph 149: the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces.

6.16 The MOL Assessment report confirms that Exception (b) and (d) apply to the cycle hire and toilet building element of the scheme.

6.17 The MOL Assessment report confirms that Exception (d) applies to the proposed replacement café for the following reasons:

- The existing café building was only intended to be a temporary solution and this is not a true representation of the proposed scheme in the context of MOL policy. The proposed scheme should be considered against the previous Pavilion restaurant and club house building.
- Despite the Pavilion restaurant and club house building not being on the site for over 15 years, the MOL Assessment confirms that it was clear the temporary café building was not intended to be a permanent replacement, and the period of time that has passed should not diminish the weight that can be attributed to the former buildings.

6.18 Therefore, the café should not be considered to be materially larger than the building which it replaces (the Pavilion Restaurant and club house building) and should therefore be considered to fall within the limitations of Exception d) of Paragraph 149 of the NPPF as an exception to inappropriate development in MOL. Furthermore, the reduction in the spread of built form across the site, would significantly improve the openness of the MOL.

Very Special Circumstances

6.19 If officers are minded not to consider the scheme to fall within the above exceptions to inappropriate development in MOL, the MOL Assessment report includes and details the very special circumstances which are considered to exist in respect of justifying why the proposed development should be considered acceptable in the context of MOL planning policy.

6.20 The MOL Assessment report focuses on providing a detailed explanation of the very special circumstances which are considered to exist and the level of potential harm which they are considered to outweigh. Policy dictates that the very

special circumstances must be read in the context of their weight against any harm by reason of inappropriateness, and any other harm. The key matters in respect of such harm relate to openness, designated heritage assets, trees and landscaping. In this instance, for the reasons set out within the MOL Assessment report, the potential harm to the MOL by reason of inappropriateness, and any other harm, is considered to be very limited.

6.21 The question in relation to MOL policy therefore is whether the very limited harm is outweighed by very special circumstances. It is considered that significant weight should be attributed to the very special circumstances which exist and as such, it is considered that they significantly outweigh any potential harm.

6.22 The MOL Assessment report which accompanies this planning submission should be referred to for a full analysis and justification.

6.23 Taking account of the above, and with cross reference to the MOL Assessment report, the principle of development in the context of MOL policy is considered acceptable.

Design and Layout

Relevant Policy

6.24 Chapter 12 of the NPPF confirms the creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve.

6.25 London Plan Policy GG2 Making the best use of land states to create successful sustainable places that make the best use of land, development proposals must enable the development of brownfield land. The open spaces of London, including Metropolitan Open Land, should be protected and enhanced and the creation of new green infrastructure and securing biodiversity net gains should be promoted.

6.26 London Plan Policy D4 Delivering good design states that where appropriate, visual modelling should be undertaken to analyse potential design options for an area, site or development proposal. These models should be used to inform decision-taking. The Policy also states that Design and Access Statements should demonstrate that the proposal meets the design requirements of the London Plan.

6.27 London Plan Policy D5 Inclusive Design states that development proposals should (2) achieve the highest standard of accessible and inclusive design and provide high quality people focused spaces that are designed to facilitate social interaction and inclusion. Criteria (4) of the Policy requires that developments are able to be entered, used and exited safely, easily and with dignity for all. Criteria (5) requires development proposals be designed to incorporate safe and dignified emergency evacuation for all building users.

6.28 London Plan Policy D8 Public Realm development proposals should encourage and explore new opportunities to create new public realm where appropriate; and ensure the public realm is well-designed, safe, accessible, inclusive, attractive, well-connected, related to the local and historic context, and easy to understand, service and maintain. Landscape treatment, planting, street furniture and surface materials should be of good quality, fit-for-purpose, durable and sustainable. Proposals should maximise the contribution that the public realm makes to encourage active travel and ensure its design discourages travel by car.

6.29 Policy LP 1 Local Character and Design Quality states that the Council will require all development to be of high architectural and urban design quality. Development proposals will have to demonstrate a thorough understanding of the site and how it relates to its existing context, including character and appearance, and take opportunities to improve the quality and character of buildings, spaces and the local area. Compatibility with local character; sustainable design and construction; layout, siting and access; space between buildings; inclusive design, connectivity, permeability; suitability and compatibility of uses will be considered inter alia.

6.30 Policy LP 2 Building Heights states that the Council will require new buildings including redevelopment of existing buildings to respect and strengthen the setting of the borough's valued townscapes and landscapes through appropriate building heights.

6.31 Policy LP 17 Green Roofs and Walls states that the use of green/brown roofs and green walls is encouraged and supported in smaller developments, renovations, conversions and extensions.

Appraisal

6.32 David Morley Architects have prepared a Design and Access Statement which provides detail of the design evolution and final scheme.

6.33 This is a landscape-led scheme and this is reflected in the location, orientation, scale and design of the proposed building. It makes best use of the existing natural environment, such as existing trees, and creates opportunities for enhancements, including a significant amount of new planting and soft/green landscape features.

6.34 The building and associated development recognises the needs of the visitors this area of the park, carefully balancing pedestrian, cycle and vehicle use. The building and surroundings are designed to be fully accessible to provide a completely inclusive piece of visitor infrastructure, in line with The Royal Parks wider management objectives.

6.35 The predominantly timber exterior with extensive green roof will enable the new building to sit well within the wider

natural landscape. Close up, it will have a character and quality befitting a Royal Park, but in longer views it will blend into the natural environment so as not to create a prominent feature within the landscape.

6.36 The design will also result in a significant reduction in the spread of built form across this area of the park, creating a more open environment and better utilising existing developed areas alongside significant landscape improvements.

6.37 Given the above, and with reference to the detail provided in the Design and Access Statement which supports this planning application, it is considered that the design is fully compliant with all relevant planning policy.

Drainage

Relevant Policy

6.38 London Plan Policy SI12 Flood Risk Management states that development proposals should ensure that flood risk is minimised and mitigated, and that residual risk is addressed.

6.39 Policy LP 21 Flood Risk and Sustainable Drainage states that all developments should avoid, or minimise, contributing to all sources of flooding. The Council will require the use of Sustainable Drainage Systems (SuDS) in all development proposals. Applicants will have to demonstrate that their proposal complies with a reduction in surface water discharge to greenfield run-off rates wherever feasible. Where greenfield run-off rates are not feasible, this will need to be demonstrated by the applicant, and in such instances, the minimum requirement is to achieve at least a 50% attenuation of the surface water runoff at peak times based on the pre-development levels.

Appraisal

6.40 A Flood Risk Assessment has been prepared by Price & Myers to support the BREEAM certification. The report also outlines the proposed drainage strategy for the site, including a detailed SuDS assessment.

6.41 The site is in Flood Zone 1 and has a probability of fluvial flooding of less than 0.1%. Groundwater flooding is considered to be low as groundwater was encountered at 2m below ground level, during a prolonged period of wet weather. The site is not at risk of flooding from reservoirs or sewers.

6.42 The site has areas of localised high, medium and low risk of surface water flooding. The flood risk from surface water will be managed by raising the site levels. The finished floor level of the new buildings will be set at 9.85m AOD, above the surrounding ground levels. Surface water flow crossing the site from the north-east will be directed to the north of the building, and will follow the existing flow path off-site towards the Beverley Brook.

6.43 The FRA includes an assessment of surface water runoff. The site's existing drainage is to the Beverley Brook via a private drainage system. SuDS measures include a green roof, swale and permeable paving, which have been incorporated to maximise biodiversity and amenity in addition to drainage control. Surface water will discharge into the Beverley Brook via the existing network, and attenuation will be provided in the swale and below ground attenuation tank.

6.44 The proposal is therefore assessed to be in compliance with the relevant legislation, policy and guidance relating to flood risk and sustainable drainage.

Ecology and Biodiversity

Relevant Policy

6.45 London Plan Policy G6 Biodiversity and access to nature states that development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain. This should be informed by the best available ecological information and addressed from the start of the development process.

6.46 Local Plan Policy 15 Biodiversity states that the Council will enhance the borough's biodiversity, through incorporating and creating new habitats or biodiversity features, including trees, into development sites and maximising the provision of soft landscaping, including trees, shrubs and other vegetation that support the borough-wide Biodiversity Action Plan.

6.47 In England, Biodiversity Net Gain (BNG) became mandatory from 2nd April 2024 under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021). Under this legislation, a minimum of 10% BNG is required, calculated using the Biodiversity Metric. This legislation applies to all development except those listed under exemptions.

Appraisal

6.48 LUC have prepared a Preliminary Ecological Appraisal which concludes that there would no significant harm to any protected species of habitat on the site.

6.49 The BNG report has been undertaken using the statutory metric and demonstrates that a BNG of over 10% will be achieved.

6.50 It is therefore considered that the scheme complies with relevant policy in this regard.

Energy Efficiency

Relevant Policy

6.51 London Plan Policy S12 Minimising Greenhouse Gas Emissions states that development should follow the energy hierarchy: be lean, be clean, be green and be seen.

6.52 Policy LP 20 Climate Change Adaption states that the Council will promote and encourage development to be fully resilient to the future impacts of climate change in order to minimise vulnerability of people and property. New development should minimise the effects of overheating as well as minimise energy consumption in accordance with a cooling hierarchy.

6.53 Policy LP 22 Sustainable Design and Construction states that developments will be required to achieve the highest standards of sustainable design and construction to mitigate the likely effects of climate change. Applicants of developments with more than 100sq.m of non-residential floor space must complete the Sustainable Construction Checklist SPD to submit with the application. New non-residential buildings will be required to meet BREEAM 'Excellent' standard, and reduce carbon dioxide emissions by 35% over the target emission rate (TER) based on Part L of the 2013 Building Regulations.

Appraisal

6.54 Max Fordham have prepared an Energy Statement which confirms the design philosophy in the London Plan has been followed.

- Be lean: The proposed buildings will have high performance building fabric, airtightness and thermal bridging to reduce winter heat loss and summertime gains. Mechanical ventilation with heat recovery is proposed where natural ventilation is not appropriate. High efficiency lighting and motion sensing and variable speed and controls are proposed.
- Be clean: No district heating network connection is available so no reduction is possible at this stage of the hierarchy.
- Be green: Air source heat pumps are proposed to provide heating and DHW. A heat pump is proposed to provide tempered air to the kitchen. Photovoltaic panels of 98sq.m are proposed on the sloped roof of the café.

6.55 The Energy Statement details the proposed development's carbon dioxide emissions. The proposed development achieves 65% over the target emission rate (TER) based on Part L of the 2013 Building Regulations, using heat pumps and PV panels.

6.56 A BREEAM Pre-Assessment is also submitted which shows the route to achieving 'Excellent' and a Sustainable

Construction Checklist has been submitted in accordance with LBRuT validation requirements.

6.57 Given the above, it is considered the proposed development complies with all relevant planning policy in respect of energy efficiency.

Fire Safety

Relevant Policy

6.58 London Plan Policy D12 Fire safety requires all development proposals to achieve the highest standards of fire safety and ensure that they identify suitably positioned unobstructed outside space for fire appliances and an evacuation assembly point; incorporate features that reduce the risk of fire including appropriate fire alarm systems and fire safety measures; are constructed in an appropriate way to minimise the risk of fire spread; provide suitable and convenient means of escape, and associated evacuation strategy for all building users; develop a robust strategy for evacuation which can be periodically updated and published, and which all building users can have confidence in; and provide suitable access and equipment for firefighting which is appropriate for the size and use of the development.

6.59 Policy D5 'Inclusive Design' of the London Plan states that development proposals should be designed to incorporate safe and dignified emergency evacuation for all building users.

Appraisal

6.60 A Fire Safety Strategy has been prepared by an appropriately qualified professional and is included within this planning submission in accordance with LBRuT validation requirements. The Strategy includes an annotated floorplan showing the evacuation routes and the following fire safety features:

- REI 60min fire compartment line including 60min FDS doors around the plant in the toilet and bicycle hire building; and surrounding the kitchen and electric rooms.
- A fire shutter is located adjacent the kitchen.
- There is space for fire vehicle access.
- An existing fire hydrant is located to the west of the building, across the car park.

6.61 Given the above, and with reference to the Fire Strategy document, the proposed development is considered to comply with relevant policy.

Historic Environment

Relevant Policy

6.62 Paragraph 200 of the NPPF requires applicants to describe the significance of any heritage assets affected,

including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance.

6.63 Paragraph 203 of the NPPF states that in determining applications, local planning authorities should take account of (c) the desirability of new development making a positive contribution to local character and distinctiveness.

6.64 Paragraph 208 of the NPPF states that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

6.65 Paragraph 212 of the NPPF states that local planning authorities should look for opportunities for new development within Conservation Areas and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset, or which better reveal its significance, should be treated favourably.

6.66 London Plan Policy HC1: Heritage Conservation and Growth states that development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings.

6.67 Policy LP 3 Designated Heritage Assets states that the Council will require development to conserve, and where possible, make a positive contribution to the historic environment of the borough. Development proposals likely to adversely affect the significance of heritage assets will be assessed against the requirement to seek to avoid harm and the justification for the proposal. The significance (including the settings) of the designated heritage assets including Conservation Areas, listed buildings, Scheduled Monuments and Registered Historic Parks and Gardens will be conserved and enhanced. Great weight will be given to the conservation of the heritage asset when considering the impact of a proposed development on the significance of the asset. The Borough's registered Historic Parks and Gardens should be protected and enhanced by ensuring that proposals do not have an adverse impact on their significance, including their setting and/or views to and from the registered landscape.

6.68 With respect to protecting Conservation Areas, all proposals are required to preserve and, where possible, enhance the character or the appearance of the Conservation Area. Proposals for substantial demolition in Conservation Areas will be resisted, unless it can be demonstrated that the building makes no positive contribution to the character or distinctiveness of the area.

6.69 Policy LP 7 Archaeology designates the application site as being located within an Archaeological Priority Area

with finds dating from prehistory. The Policy requires desk-based assessments and, where necessary, archaeological field evaluation will be required before development proposals are determined, where development is proposed on sites of archaeological significance or potential significance.

Appraisal

6.70 LUC have prepared a Historic Environment Assessment (HEA) which includes an assessment of archaeology. The heritage assets within the 500m study area comprise the Richmond Park Registered Park and Garden (grade I listed; NHLE ref: 209715), Richmond Park Conservation Area and within Richmond Park Archaeological Priority Area 1:6 -Tier 1 (APA). Within the outer study area of a 1km buffer, three registered parks and gardens, 31 listed buildings, 15 conservation areas are located. Only two designated assets were concluded to be potentially affected by the proposed development; Richmond Park Registered Park and Garden and Richmond Park Conservation Area.

6.71 There will be no physical effect on any designated or non-designated heritage assets within the Site during either construction or use of the site. Impacts on the significant of heritage assets surrounding the site as a result of changes to their setting have been carefully assessed and found to be acceptable.

6.72 The existing structures do not contribute to the significance of the conservation area, and it will not therefore be harmed by their demolition. They are not of heritage value. The redevelopment of the Site will not significantly alter the appearance and character of the conservation area. The contribution of the site to the significance of the conservation area is not affected. The unique landscape character of the park will remain fully appreciable and understandable.

6.73 The scale, height, layout, detailed design and selection of materials of the proposed development, contained within the backdrop of the tree line, harmoniously integrates with the site's surroundings and will not be perceived as elements of visual distraction.

6.74 The aesthetic value of this area of the park, its historical illustrative elements, and the connection with the communal history of the place will remain fully appreciable and understandable. No harm is therefore caused to the significance of the asset.

6.75 Overall, the proposal will not detract from the appreciation of the Registered Park and Garden and Conservation Area's significance. The presence of a tree belt and the retention of natural features, combined with the appearance of the proposed development, will partly screen the site creating a sense of seclusion from the rest of the park. Its overall impact will therefore be no greater than that of the existing development within the site.

6.76 The proposed development will necessitate demolition and construction phases within the site, involving ground disturbance and excavations reaching a depth of 1.7m BGL.

6.77 These activities are likely to affect the integrity and significance of archaeological remains that might be preserved below ground. The ground disturbance caused by demolition and construction might affect the integrity of or destroy hitherto unknown archaeological remains preserved within the site. A Written Scheme of Investigation will be secured by condition, requiring an archaeological evaluation to be conducted to determine the presence/absence, significant and preservation of any archaeological remains found. If assets of archaeological interest are identified as a result of the evaluation, a more comprehensive WSI will apply.

6.78 The proposal is therefore assessed to be in compliance with the relevant legislation, policy and guidance relating to the historic environment.

Transport

Relevant Policy

6.79 London Plan Policy T5 Cycling states that development proposals should help remove barriers to cycling and create a healthy environment in which people choose to cycle. This will be achieved through (2) securing the provision of appropriate levels of cycle parking which should be fit for purpose, secure and well-located. Developments should provide cycle parking at least in accordance with the minimum standards. It should be laid out and designed in accordance with the guidance contained in the London Cycling Design Standards. For cafes and restaurants in the area with higher cycle parking standards, Table 10.2 confirms that 1 long-stay space per 175sq.m and 1 short-stay space per 20sq.m should be provided.

6.80 London Plan Policy T6 Car parking states that car parking should be restricted in line with levels of existing and future public transport accessibility and connectivity. Where car parking is provided in new developments, provision should be made for infrastructure for electric or other Ultra-Low Emission vehicles in line with Policy T6.4 (hotel and leisure uses parking). Adequate provision should be made for efficient deliveries and servicing and emergency access. A Parking Design and Management Plan should be submitted alongside all applications which include car parking provision, indicating how the car parking will be designed and managed with reference to Transport for London guidance on parking management and design. Where sites are redeveloped, parking provision should reflect the current approach and not be re-provided at previous levels where this exceeds the standards set out in this policy.

6.81 London Plan Policy T6.4 Hotel and leisure uses parking states that in locations of PTAL 0-3, schemes should

be assessed on a case-by-case basis and provision should be consistent with the Healthy Streets Approach, mode share and active travel targets, and the aim to improve public transport reliability and reduce congestion and traffic levels.

6.82 Local Plan Policy LP 44 Sustainable Travel Choices states that the Council will work to promote safe, sustainable and accessible transport solutions which minimise the impacts of development including in relation to congestion, air pollution and carbon dioxide emissions. New development should be designed to maximise permeability within and to the immediate vicinity of the development site through the provision of safe and convenient walking and cycling routes and to provide opportunities for walking and cycling including through provision of links and enhancements to existing networks.

6.83 Local Plan Policy LP 45 Parking standards and servicing states that the Council will require new development to make provision for the accommodation of vehicles in order to provide for the needs of the development while minimising the impact of car-based travel including on the operation of the road network and local environment and ensuring the best use of land. Development will be required to provide for car, cycle, 2 wheel and where applicable lorry and EV charging points, in accordance with the standards set out in Appendix 3.

Appraisal

6.84 The November 2021 pre-application response requested that visibility splays be included in the Transport Statement (TS); an existing car park utilisation study to be undertaken; disabled parking provision per the London Plan; inclusion of Construction Logistics Plan as part of submission; Electric Charging provision per the London Plan; and inclusion of Travel Plan Statement.

6.85 Stantec have produced a TS which sets out the site's access, travel connectivity, existing parking, public transport, the local highway network, the proposed development and impact on the highway.

6.86 The TS confirms the existing car park comprises of three types of spaces, formal surfaced spaces, informal gravel spaces and overflow parking to the south-east. This equates to a total of 245 spaces, four of which are allocated as disabled spaces. A full breakdown of the existing car parking spaces is provided in the TS. The proposals include a formalisation of the car park, resulting in 225 car parking spaces accessed from the relocated site access with Priory Lane. An additional 10 disabled parking spaces are proposed, which would bring the percentage of disabled spaces to 6.2%, in line with the London Plan.

6.87 The café's existing cycle parking provision includes a total of 10 Sheffield stands, with provision for 20 bicycles. The proposals are for a total of 49 bicycle stands with space for 98

bicycles, to be located in the area in front of the café entrance and adjacent to the bicycle hire and toilet building. This is an uplift of 78 formal bicycle parking spaces.

6.88 The TS presents the findings of a car parking accumulation survey, which demonstrates in summary that the existing car parking accumulation does not exceed the total number of car parking spaces provided within the car park on both a weekday and weekend.

6.89 The proposal will result in a marginal decrease in car parking spaces, from 245 to 225. This is justified by the findings of the parking survey, and the proposals are not expected to create a significant uplift in vehicular demand. There is sufficient provision and no risk of overspill onto the surrounding highway network. In conclusion, the proposals are not expected to have a material impact on the operation of the local highway network. Safe and suitable access will be provided for all users and the development will not have a material impact on the operation and safety of the local highway network.

6.90 A Staff Travel Plan Statement (TP) has been prepared with the objective of maximising opportunities for staff working at the café to travel to the site sustainably. The aims of the TP are to promote and implement a range of physical measures to encourage and support the uptake of sustainable mode alternatives to single car use; promote more sustainable ways of driving for those who do not have other options; and set out a clear framework to collect future robust travel survey information in order to monitor the TP in line with the monitoring schedule.

6.91 The TP confirms that the site is located in a TfL PTAL rated 0 area, due to lack of public transport opportunities within Richmond Park. There are a number of bus services accessible from the café along Upper Richmond Road West and Roehampton Lane. The closest bus stop is a 7 minute walk away, and has regular services. A number of train stations are within an acceptable cycling distance.

6.92 A TP Co-ordinator will be nominated to monitor and enforce the actions in the TP. A travel information pack will be provided to employees promoting awareness of travel options. Basic cycle maintenance equipment will be provided at the site, specific transport events will be supported, and the TP will be monitored at regular intervals with reports submitted to the LPA.

6.93 Stantec have provided a Delivery and Servicing Plan which will ensure the servicing of the development will be carried out legally and safely, with no negative impact on the local highway network, surrounding occupiers and the environment. This provides details on the delivery and servicing strategy including vehicle routing and circulation and waste collection.

6.94 An Outline Construction Logistics Plan ('Outline CLP') has been prepared by Stantec in response to the pre-application requests from the LPA, to provide an overview of the expected construction and logistics activity that is to take place during the construction phase of the development. The contractor's amenities and provisions are set out in Section 2. Construction works are programmed over 25 weeks, subject to finalising contracting arrangements between the developer, its contractor and the LPA. The Outline CLP sets out the stages of the work and the routes for construction vehicles to travel from the south and north. All loading and deliveries will be undertaken from Priory Lane adjacent to the site boundary within Richmond Park, which is owned by TRP and is not adopted highway.

6.95 The proposal is therefore assessed to be in compliance with the relevant legislation, policy and guidance relating to car parking, sustainable travel, safe and suitable access and highways impact.

Trees and Landscaping

Relevant Policy

6.96 Paragraph 180 of the NPPF states that planning policies and decisions should contribute to and enhance the natural and local environment by: recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital land ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodlands.

6.97 London Plan Policy G7 Trees and woodlands states that development proposals should ensure that, wherever possible, existing trees of value are retained. If planning permission is granted that necessitates the removal of trees there should be adequate replacement based on the existing value of the benefits of the trees removed, determined by, for example, i-tree or Capital Asset Value for Amenity Trees (CAVAT) or another appropriate valuation system. The planting of additional trees should generally be included in new developments – particularly large-canopied species which provide a wider range of benefits because of the larger surface area of their canopy.

6.98 Policy LP 16 Trees, Woodlands and Landscape of the Local Plan requires the Council to protect, respect, contribute to and enhance trees and landscapes through resisting the loss of trees (including veteran trees). Trees should be adequately protected throughout the course of development, in accordance with BS: 5837. The policy continues that if trees are to be lost, an appropriate replacement for any tree that is felled will be required and a financial contribution to the provision of an off-site tree in line with the monetary value of the existing tree in line with CAVAT.

Appraisal

6.99 Canopy Consultants have undertaken a Tree Survey and produced an Arboricultural Impact Assessment (AIA) and draft Method Statement and Tree Protection Plan.

6.100 Through the specified construction methodologies and tree protection measures set out under the draft Arboricultural Method Statement within the Arboricultural Impact Assessment, it will be possible to minimise the impact of the proposed development on the retained trees.

6.101 A tree survey was carried out in 2020 and updated in March 2024. The report notes that the findings of the tree survey was that the majority of the trees are in a good condition and contribute to the amenity of the wider landscape. Full results are provided in Appendix 1 of the report.

6.102 Trench excavations were conducted around T46, a veteran sweet chestnut tree growing in close proximity to the existing café. The purpose of the root survey was to understand the shape of the Root Protection Area (RPA) of T46 and neighbouring tree T47, to understand if the previous car park layout could have had an impact on the root spread of these trees. The proposed café building is located to the north of these trees.

6.103 The results show that the potential rooting environment to the north and west of the trees has been disturbed by historic construction activity. Therefore, the RPA of T46 and T47 can be adjusted to not include the area to the north of the kerb of the former car park, and for T46, to omit the area to the west of trench 1.

6.104 The AIA finds that six trees will be removed to enable the proposed development. The report calculates the CAVAT valuation of these trees to be removed. A number of trees will be affected by the proposed development, and tree protection measures in line with BS 5837 are proposed, illustrated on the Tree Protection Plan.

6.105 The draft Arboricultural Method Statement (AMS) confirms the means by which the retained trees and hedges can be protected throughout the development.

6.106 TRP have produced a Landscaping Scheme which confirms that significant tree planting is proposed across the site and within the surrounding car parking area also owned by TRP.

6.107 The proposal is therefore assessed to be in compliance with the relevant legislation, policy and guidance relating to the protection and management of trees.

Waste Management

Relevant Policy

6.108 London Plan Policy T7 Deliveries, servicing and construction states that development proposals should facilitate sustainable freight movement by rail, waterways and road. Development proposals should facilitate safe, clean, and efficient deliveries and servicing. Provision of adequate space for servicing, storage and deliveries should be made off-street. Construction Logistics Plans and Delivery and Servicing Plans will be required and should be developed in accordance with Transport for London guidance and in a way which reflects the scale and complexities of developments. Inclusive and safe access for people walking or cycling should be prioritised and maintained at all times.

6.109 Policy LP24 Waste Management requires the Council to ensure that waste is managed in accordance with the waste hierarchy, which is to reduce, reuse or recycle waste as close as possible to where it is produced. All developments are required to provide adequate refuse and recycling storage space and facilities, which allows for ease of collection. The location and design of refuse and recycling facilities must be sensitively integrated into the overall design of the scheme.

6.110 The Refuse and Recycling Storage and Access Requirements for New Developments SPD (adopted December 2022) provides calculations for likely solid waste volume arising. All developments producing commercial or industrial waste must provide adequate space to store the total weekly volume of solid waste likely to arise between collections, including suitable space to enable occupants to recycle.

Appraisal

6.111 The submitted plans and DMA's Design and Access Statement confirms the approach to managing waste from the proposed development. The scheme includes a bin store designed to meet the needs of a café in this location.

6.112 Stantec have produced an outline Construction Logistics Plan which confirms that there will be a commitment to reuse demolition material on the site where this is considered appropriate. Any demolition waste removed from the site would be sorted and taken to a recycling centre.

6.113 The Delivery and Servicing Plan will ensure the servicing of the development will be carried out legally and safely, with no negative impact on the local highway network, surrounding occupiers and the environment and provides details on the delivery and servicing strategy including vehicle routing and circulation and waste collection.

6.114 The proposal is therefore assessed to be in compliance with the relevant legislation, policy and guidance relating to the management of waste.

Chapter 7

Summary and Conclusions

7.1 This Planning Statement has been prepared by LUC on behalf of the applicant, The Royal Parks, to support an application for the demolition and replacement of a café at Roehampton Gate in Richmond Park within a landscape led scheme.

7.2 Full planning permission is sought for the demolition of the existing buildings on site and the replacement of the temporary café building with a well-designed sustainable café, a larger toilet block and new cycle hire building, to meet visitor needs in this area of the Royal Park. The scheme also includes extensive landscaping works and a new pedestrian access into the park from the Alton Estate.

7.3 This report should be read in conjunction with the other reports and documents which accompany this planning application, notably the Design and Access Statement, Heritage Statement and Landscaping Scheme.

7.4 TRP have consulted with the public and key stakeholders on the proposals.

7.5 In accordance with the policy review set out in Chapter 6 of this Statement, the development complies with all of the relevant national, regional and local planning policy as the development:

- Is an appropriate form of development within Metropolitan Open Land;
- In the case that Officers do not agree the scheme would fall within the exceptions to inappropriate development, it also describes the very special circumstances which exist in support of the scheme, and which outweigh the very limited harm to the MOL by reason of inappropriateness, and any other harm;
- Will enhance the historic setting of Richmond Park;
- Will provide additional habitats for local wildlife and plant additional trees;
- Will enhance the local landscape.