

Comment on a planning application

Application Details

Application: 24/1985/FUL

Address: Roehampton Gate Cafe Richmond Park Richmond SW15 5JR

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

Comments Made By

Name: Ms. Virginia Greenton

Address: 33 LIVERPOOL ROAD KINGSTON UPON THAMES KT2 7SX

Comments

Type of comment: Object to the proposal

Comment: I am writing to urge Richmond Borough Council to refuse planning permission for the above development on Metropolitan Open Land (MOL) grounds.

Development within MOL is dealt with in detail at NPPF, London Plan and Local Plan levels. The email dated 5 November 2021 from your colleague Holly Eley as a response to the applicant's pre-application submission set out in clear terms what the fundamental objections were to the scheme as it then was. Nothing has changed since then in policy terms.

The 'Metropolitan Open Land Assessment' report by LUC dated July 2024 sets out the history of the site and makes a valiant attempt at justifying what is now proposed, but it falls far short of explaining why the application should result in the grant of planning permission.

Para 154, NPPF exception (b)

This exception refers to 'outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments'. So if MOL is being used for, say, playing fields, it is reasonable to conclude that a small building which provides changing rooms and shower /WC facilities may be appropriate: that built development is reasonably necessary - and therefore appropriate - to support the primary use of the open area. An open space - whether a municipal park, enclosed park (whether or not a SSSI, National Nature Reserve etc.) or open area of the countryside - cannot be said to need catering facilities. Richmond Park would function just as well without the new facilities on the application site. It is immaterial that there would be public demand for what a large café building would provide.

Para 154, NPPF exception (d)

Despite the clear wording of this exception - 'The replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces' - LUC seek to say that the LPA should not use the existing buildings as a comparator. LUC say specifically at paragraph 3.2.3 of their report that 'the scheme currently being proposed is actually a replacement for the original Pavilion Restaurant and club house building'. That assertion is entirely misconceived to the point of being risible. They are referring to buildings which have not existed these past 20 years. If buildings which have not existed for 20 years are nevertheless to be regarded as existing for these purposes, why not buildings which have not existed for 30 years. If 30, why not 50?

An increase from 268 square metres GIA to 446 square metres is wholly contrary to policy.

In fact, the replacement argument does not even fall to be entertained. As Ms Eley noted in her letter, the buildings which

burned down in 2004 have already been replaced on MOL, pursuant to the permission granted under reference 10/3766/FUL. How many times do LUC think that one can rely on destroyed buildings to justify the building of others?

Very special circumstances

Despite what LUC say from paragraph 3.35 onwards, there are no circumstances, whether special or very special, which they in reality identify. The proposals are simply contrary to policy, and the special pleading on behalf of the applicant is without any firm basis.

It would be extraordinary for the Council to grant permission for a development which is so egregiously inconsistent with policy at all levels. I trust that you will advise members that this application must be refused.