

OLD DEER PARK

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I. Introduction

This Supplementary Planning Document (SPD) has been produced by the London Borough of Richmond upon Thames (LBRuT) to provide an integrated framework which supports the conservation, enhancement and management of the Old Deer Park as a historically important and well used recreational and community area of the borough. It considers the historic attributes of the site, the relevant planning policy framework, the recreational and community activities, environmental considerations and identifies opportunities to support its maintenance and enhancement. The SPD will form part of the Council's planning policy framework upon adoption.

Opportunities have been identified to conserve and enhance the Old Deer Park (the Park), including for sports, recreation and community use. The SPD will ensure that any prospective developments on these sites are sensitive to the historic landscape of the Park and the features it contains whilst supporting the important recreational/sporting community activities within it. It also identifies opportunities for enhancements, which reflect its historic context.

It is recognised that there is likely to be a desire over the next few years by some organisations, with a land and property interest in the Park, to move forward with schemes to improve their facilities. There are also opportunities to improve links into and across the Park, and for wider environmental improvements. The Park is an important natural, historic and community asset, so it is vital that any decisions taken are done on the basis of looking at the Park as a whole, as opposed to a series of parcels of land with different uses.

The park is included as Grade I in Historic England's Register of Historic Parks and Gardens, is designated a Conservation Area and forms part of the buffer zone to the Royal Botanic Gardens, Kew, which is a World Heritage Site. The boundary of the SPD is aligned to the Old Deer Park Conservation Area boundary. The Conservation Area boundary is not completely contiguous with the boundary of the Park as viewed 'on the ground'. In particular part of the southern end of the Park between the A316 Twickenham Road and Old Palace Lane lies within the Richmond Riverside Conservation Area. To ensure that the Park is considered in its entirety these areas have also been considered within the SPD. Given the great significance of the Park, its relationship with the surrounding area has also been considered to ensure that key assets and important connections into and across the Park are taken into consideration.

The SPD follows consultation with stakeholders including the local community to discuss key issues and opportunities relating to the future of the Park. This included consultation in Summer 2015 and Autumn 2016. The Statutory consultation ran from 8th December 2017 to 22nd January 2018 and included online consultation material and questionnaire and 'drop-ins' at Pools on the Park on 6th January 2018, and Richmond Adult Community College on 11th January 2018.



Old Deer Park Recreation Ground



Wayfinding - Old Deer Park car park



Old Deer Park signage



The King's Observatory

2. The Site and its Surroundings

Overview

The Old Deer Park (the Park) lies to the south of the Royal Botanic Gardens, Kew, and follows the line of the River Thames (which lies to the west) down to the Twickenham Road and Richmond Rail Bridges. The A316 Twickenham Road and the railway line bisect its southern tip. Its boundary extends across as far as the railway line, as well as sites including the Richmond Adult Community College. The area covered by the draft SPD is shown in the map below.

As well as being a designated Conservation Area the Park is included as Grade I in Historic England's Register of Historic Parks and Gardens and a large proportion of it forms part of the buffer zone designated to protect the integrity of the Royal Botanic Gardens, Kew as a World Heritage Site. It contains a number of buildings and structures which appear in the statutory list of buildings as being of architectural or historical significance or which are locally listed as Buildings of Townscape Merit. It also has a wealth of archaeology, some of which is as yet unexplored. It is bordered by a number of other conservation areas, namely:

- Richmond Riverside Conservation Area (No. 4)
- Richmond Green (No. 3)
- Central Richmond (No. 17)
- St Margarets (No. 19)
- Royal Botanic Gardens, Kew (No. 63)
- Kew Foot Road (No. 36)
- Kew Road (No. 55)
- Isleworth Riverside (within the London Borough of Hounslow).

Several listed structures are also located on the Park's boundaries, including Twickenham Bridge (Grade II*), Richmond Railway Bridge (Grade II) and Richmond Footbridge, Lock and Sluices (Grade II*).

The area is extensive, being approximately 147 hectares in total, with a varied character ranging from public open space and natural landscape supported by many mature trees, through to car parking,



Figure 1: Aerial Photograph of SPD area

sports facilities (comprising buildings and formal playing pitches) and community buildings. The Park's main function is for sport, recreation, leisure and community related uses, together with infrastructure, such as car parking and areas important for biodiversity. A summary of the main uses is set out below:

- Old Deer Park Recreation Ground, with public open space, rugby and football pitches, a cricket square, tennis courts, children's play areas and an outdoor gym – the Recreation Ground is also used to host a number of events during the year;
- Grounds Maintenance compound with storage buildings;
- Changing rooms to support the adjoining sports pitches within the Old Deer Park Recreation Ground, as well as a nursery school and access road;
- The King's Observatory compound, which contains a Grade I listed building which is used as a private residence;
- Royal Mid-Surrey Golf Club course and clubhouse;
- Richmond Athletic Association Ground, with a large number of rugby pitches, which is home to Richmond and London Scottish Football Clubs and comprises a 1950s grandstand and late Victorian pavilion (the latter being Grade II Listed) together with a health/ squash club and several other buildings and structures and car parking;
- Richmond Swimming Baths and Lido (a Grade II Listed complex including supporting enclosed sunbathing areas which form the setting to the main building), now called 'Pools on the Park' together with associated car park and bus stop;
- The Old Deer Park Sports Ground which is home to the London Welsh Amateur Rugby Club, Richmond Cricket Club as well as tennis, squash and archery facilities; and
- Public car park, landscaped area (which is public open space), the Royal Mail sorting office and a number of community/ voluntary sector buildings.

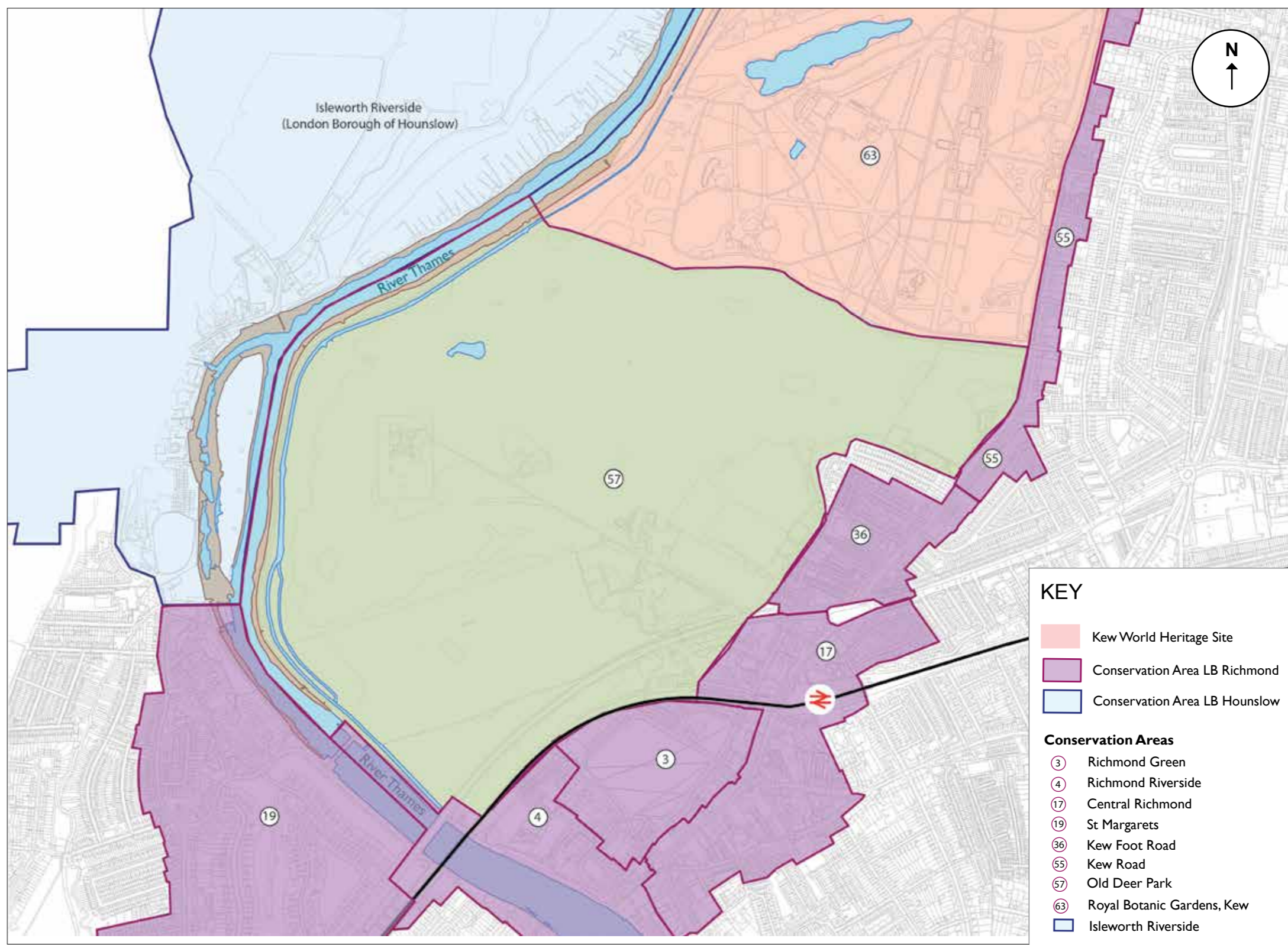


Figure 2: Neighbouring Conservation Areas

Historic Context

The evolution of Old Deer Park

The land comprising the Historic Park and Garden, within which the Park lies, formed an integral part of the royal estate from the time of Edward III's palace at Shene in the 1300's. A Carthusian monastery, the Charterhouse of Jesus of Bethlehem of Shene, was established in 1414 by Henry V on land from the former Royal Warren, on a site which was at the centre of the present Park. The land was also connected to Richmond Palace, which was built by Henry VII in the early 1500's. When a new and larger Royal Park was created by James I in 1603, it excluded the former monastery site, but incorporated its lands and the earlier royal estate. James I erected a lodge and, on the creation of Richmond Park by Charles I in 1637, the area became known as the Old Deer Park.

William III renovated an existing lodge, which stood to the north east of the building now known as The King's Observatory. In 1704, the Duke of Ormonde took over the lodge, making improvements and laying out gardens until his impeachment in 1715. In 1717, it was leased to the Prince and Princess of Wales, later George II and Queen Caroline, and renamed Richmond Lodge. Queen Caroline continued to favour Richmond Lodge until her death in 1737, and used William Kent and Charles Bridgeman to carry out extensive landscaping in the northern part of the site, so forming the original Richmond Gardens. The Lodge was subsequently demolished due to the estimated cost of its ongoing upkeep.

George III acquired the Charterhouse site, demolished the surviving monastic buildings, and commissioned Sir William Chambers to build The King's Observatory in time to observe the Transit of Venus in 1769. The Observatory (which still exists) was on the original meridian line used to set the King's time at the Houses of Parliament before Greenwich became the Prime Meridian in

1884. More information on The King's Observatory can be found at www.kingsobservatory.co.uk. A number of obelisks still exist in the Park marking the old meridian line, which were used for adjusting instruments. Capability Brown was appointed by George III as royal gardener in 1764 and was responsible for creating an Arcadian landscape uniting the areas now covered by the Royal Botanic Gardens, Kew, the Old Deer Park and Syon Park on the Middlesex bank of the River.

In 1841 the Royal Botanic Gardens, Kew was taken over by the state and has been managed separately ever since. The Royal Botanic Gardens, Kew and the Old Deer Park became physically divided through the construction of a 'Ha-Ha' in the mid-18th century. The Old Deer Park fell under the control of the Commissioner of Woods and Forests (later the Crown Estate Commissioners) and was leased out as pasture land.

In 1865 Richmond Cricket Club leased 10 acres of the Park adjacent to the Old Royal Laundry on Kew Foot Road from the Crown Estate. The following year the Cricket Club let out the ground for winter football and the pattern for local sports in the Park was set. Hockey, croquet, archery and athletics were to follow in the next decade. Cricket continued to be played on Richmond Green, but several fatal accidents from errant cricket balls in the 1880s prompted the Richmond Town Cricket Club and Athletic Association to lease the first 9 acres of the current Athletic Ground from the Crown Estate in 1885. As well as cricket, rugby and association football, the Club also brought in tennis, cycling, bowls, quoits and athletics. The pressure was taken off Richmond and Kew Greens and a diverse range of local amateur sports had found their home in pleasant, flat parkland within easy access of Richmond and Kew. Richmond Borough Council completed the transition in 1898 when it leased 87 acres of the south-eastern part of the Park

for football, hockey, cricket, a drill hall for the new Territorial Army and a tea room.

The farm and parkland surrounding The King's Observatory was leased by the Royal Mid-Surrey Golf Club in 1892, providing sufficient land for two 18-hole courses. The original golf club house was built in 1937 on the south-eastern corner of the course, adjacent to the Richmond Athletic Association Ground.

The Old Deer Park also became an open space for special events and war-time emergencies. The events began with the renowned Royal Horse Show on the Athletic Ground in 1892 (which flourished until 1967), and a Motor Show in 1899. From the First World War until 1932, 18.5 acres of the eastern park were put down to allotments to help grow food for Richmond and Kew residents. In c. 1930 the new Twickenham Road was constructed, cutting across the south-east side of the Old Deer Park.

London Scottish Football Club moved to the Athletic Ground in 1892 and London Welsh Rugby Club replaced Rosslyn Park as partner with Richmond Cricket Club in 1957. The use of the Old Deer Park for a wide range of amateur sports continues to this day. The Crown Estate still leases part of the park to the Richmond Athletic Association, the Old Deer Park Sports Ground Ltd, the Royal Mid Surrey Golf Club and the London Borough of Richmond upon Thames. The Territorial Army Hall is now used as a Royal Mail Distribution Centre. Parts of the south-eastern edge of the park are occupied by a number of volunteer groups, including the Sea Cadets, St John's Ambulance, the Air Training Corps and the North Richmond Scout Group. The Richmond Swimming Baths, now known as the 'Pools on the Park', was built in 1966. The original Royal Mid-Surrey Golf Club Clubhouse was burnt down by fire in 2001 and was replaced by a new building which opened in 2003.

Heritage Assets

Heritage designations that apply to the Park, and heritage assets within it, are set out below together with a link to the formal entries and descriptions included in the National Heritage List for England.

- Royal Botanic Gardens, Kew Historic Park and Garden (Grade I) <https://historicengland.org.uk/listing/the-list/list-entry/1000830>

Listed Buildings:

- The King's Observatory (Grade I) <https://historicengland.org.uk/listing/the-list/list-entry/1357729>
- Richmond Athletic Association Pavilion (Grade II) <https://historicengland.org.uk/listing/the-list/list-entry/1031522>
- Richmond Swimming Baths now Pools on the Park (Grade II) <https://historicengland.org.uk/listing/the-list/list-entry/1246189>
- Three obelisks. (Grade II) <https://historicengland.org.uk/listing/the-list/list-entry/1285596>

Buildings of Townscape Merit:

- Gateway piers, Park Lane
- Bridge over the railway line from Richmond Green
- Boundary Wall, Kew Foot Road
- River Tunnel Access Buildings (these lie on both banks of the River Thames, with one within the Park but outside of the SPD area).

Scheduled Monument:

- Site of Shene Charterhouse <https://historicengland.org.uk/listing/the-list/list-entry/1412036>

In addition a significant proportion of the Park lies within the Royal Botanic Gardens, Kew World Heritage Site buffer zone.

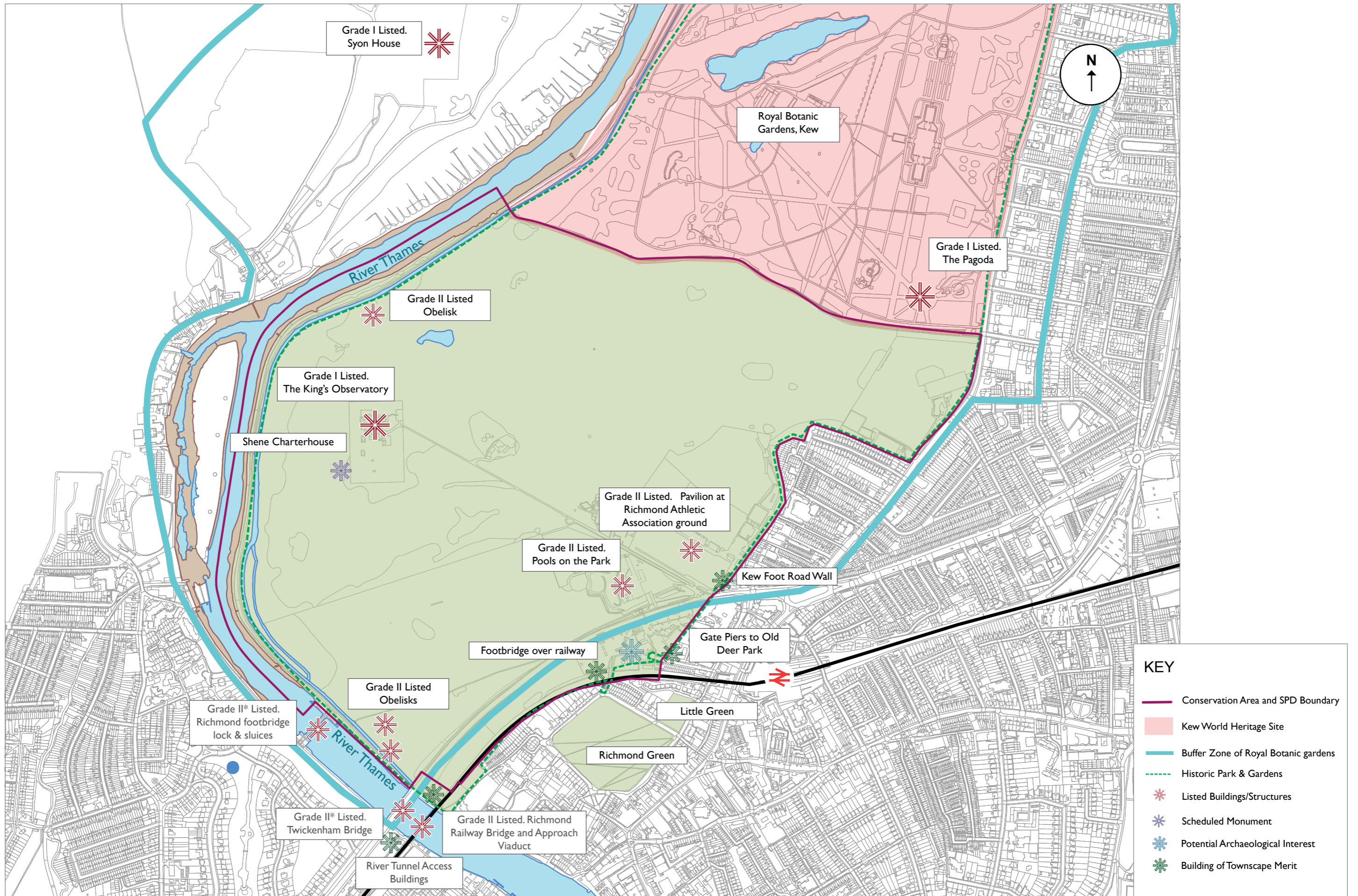


Figure 3: Heritage Assets

Landscape, Views and Open Space

There are a number of landscape, open space and ecological designations which apply to the SPD area. In addition there are a number of views and vistas of historic importance. These relate to The King's Observatory and associated historic meridian links as well as the visual connections across the wider historic landscape including to The Pagoda within the grounds the Royal Botanic Gardens, Kew..

The majority of the Park is designated as Metropolitan Open Land and a large proportion as an 'Other Site of Nature Importance'. It also includes areas designated as Public Open Space and opportunities for tree planting are also identified on parts of the site.

These areas are shown on Figure 4 and are taken from the Council's Local Plan Proposals Map July 2015. These may be subject to change in the future and therefore the most up-to-date Local Plan maps as shown on the Council's website should be referred to.

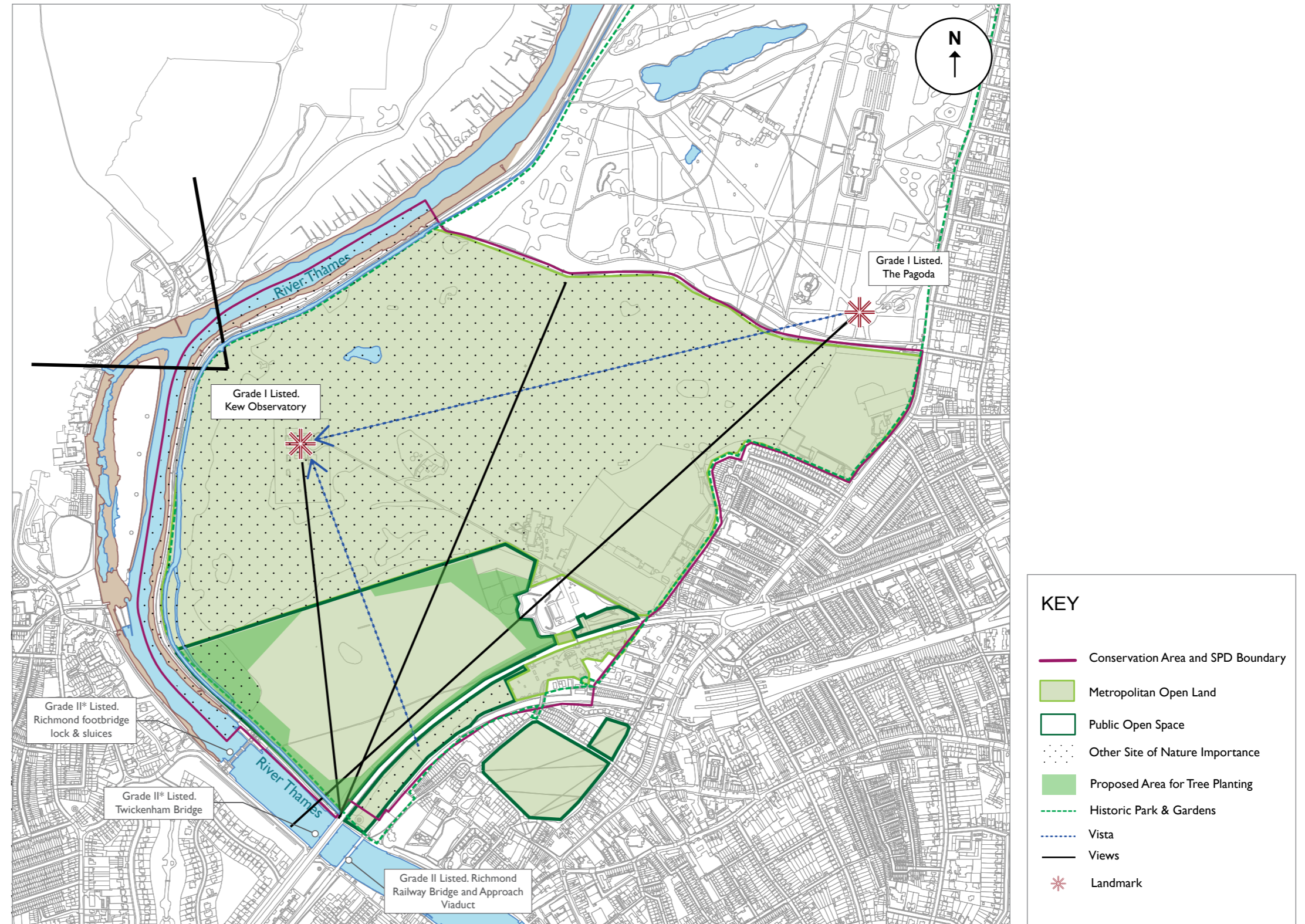


Figure 4: Landscape, Views and Open Space

Transport and Accessibility

Vehicular access to a significant proportion of the Park is from the A316 Twickenham Road. In addition, the Old Deer Park Sports Ground and a service entrance to the Royal Botanic Gardens, Kew are accessed off the Kew Road and vehicle/pedestrian access into the Old Deer Park car park is also provided by way of Park Lane. Pedestrian links across the A316 Twickenham Road, between the areas of the Old Deer Park either side of the A316, are provided by a footbridge between the south-eastern car park and the Pools on the Park and an 'at-grade' crossing adjacent to the Richmond Athletic Association Ground and Pools on the Park. Two underpasses, one of which is currently closed off (except when some events take place), provide links under the A316 to the southern end of the Park. Pedestrian links into the Park include by way of a footbridge from Richmond Green over the railway line and from the towpath along the river close to Richmond Lock.

Central Richmond with its railway station (which provides access to South Western train services, London Underground and London Overground services), and numerous bus services, as well as access to taxis, is a short walk from a large part of the Park. Provision of a bus terminal adjacent to Pools on the Park has improved public transport links to the centre of the Park. A dedicated off-road cycle lane runs parallel to the A316 providing longer distance connections to areas north and south of the Park. Up to date information regarding Public Transport Access Levels (PTAL) and other useful transport information related to the Park can be viewed using Transport for London's webCAT information site at www.tfl.gov.uk/info-for/urban-planning-and-construction/planning-with-webcat

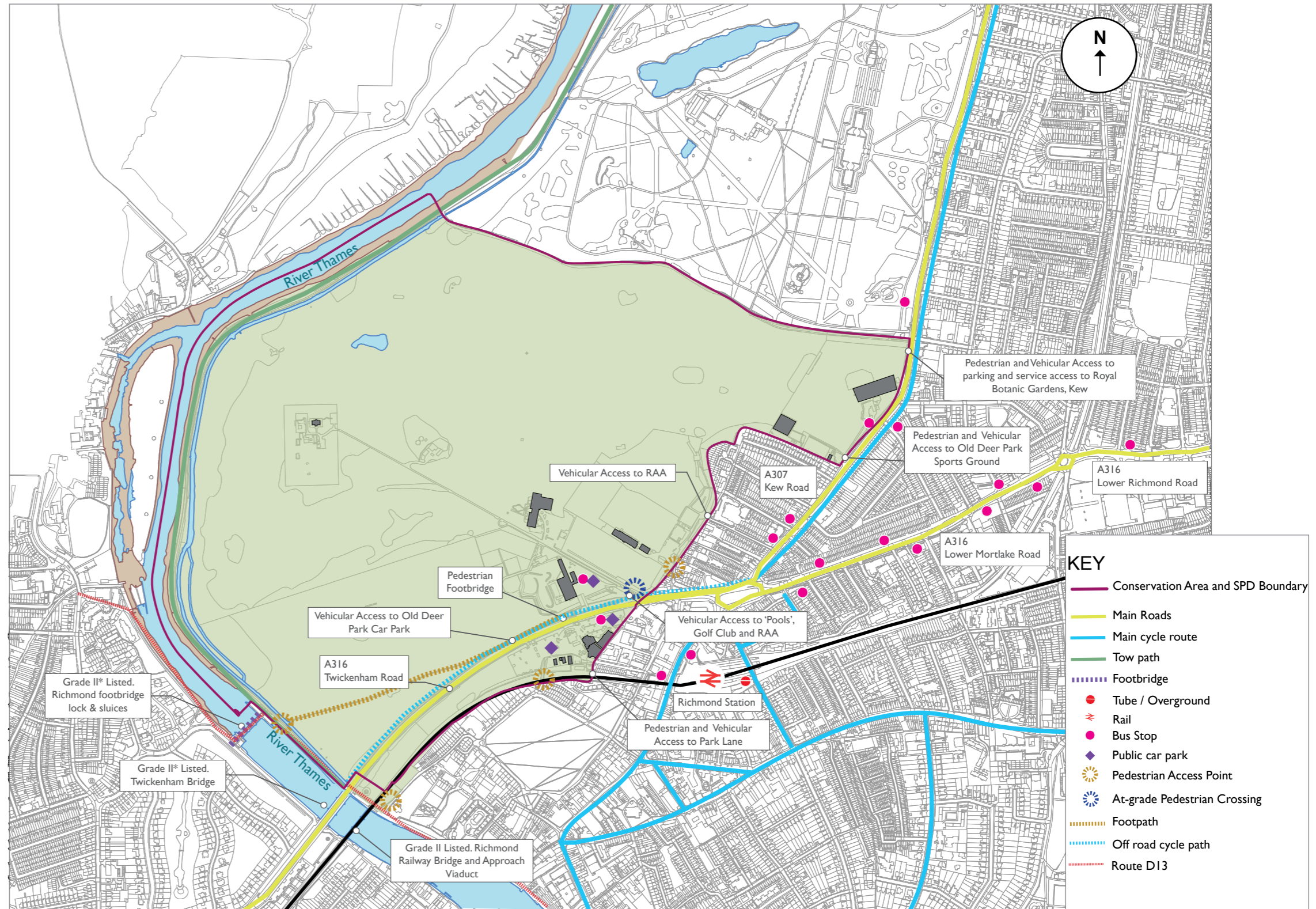


Figure 5: Transport and Accessibility

3. Planning Policy Context

National Planning Policy - National Planning Policy Framework (NPPF) 2012 and Planning Practice Guidance (PPG)

The NPPF sets out the Government's policies for England and how these are expected to be applied. The NPPF provides the national policy context for local planning authorities and decision takers, both when drawing up plans and when making decisions about planning applications. It must be taken into account in the preparation of local and neighbourhood plans, and is a material consideration in planning decisions.

First published in 2014, The PPG adds further context to the NPPF and it is intended that the two should be read together.

Regional Planning Policy - London Plan 2016 – consolidated with alterations since 2011

At a strategic level, the London Plan is the overall plan for London setting out an integrated economic, environmental, transport and social framework for the development of London. This document has been adopted to ensure that a longer-term view of London's development is taken when producing local plans, making planning decisions and investing in infrastructure. The Mayor of London is now undertaking a full review of the current Plan. Information regarding the review can be viewed at www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan.

Local Planning Policy

The Council's current statutory planning policy framework is set out in adopted Plans including the Core Strategy, adopted in April 2009, and the Development Management Plan, adopted in November 2011. There is an online proposals map and a range of guidance provided through Supplementary Planning Documents (SPDs) and Supplementary Planning Guidance (SPG) for the area.

This SPD will form part of the planning policy framework upon adoption and should be read in conjunction with the Council's planning policies and guidance as applicable. There is also a range of evidence base studies that the Council has undertaken which help to guide policy making.

The Council is currently progressing its Local Plan and in December 2016 approved its "Publication" version. This is the version of the Plan which the Council submitted to the Secretary of State for Examination in May 2017, following a 6 week period in early 2017 during which the public commented on the "soundness" of the plan. Throughout the rest of this document this is referred to as the "Local Plan".

The Local Plan has now reached a stage where it is given considerable weight in the decision making process, and is used in determining planning applications. An Independent Examination of the Local Plan commenced in September 2017. It is expected that the Local Plan will be adopted in spring 2018, at which point it will supersede all existing policies in the Core Strategy and Development Management Plan.

The following designations, which link to a number of Local Plan policies and the Council's Local Plan Proposals Map 2015 and other relevant mapping apply to the Park as follows:

- Old Deer Park Conservation Area (57)
- Public Open Space
- Historic Parks and Gardens
- Metropolitan Open Land
- Thames Policy Area
- Proposed Area for Tree Planting
- Protected Views and Vistas
- Other Site of Nature Importance
- Scheduled Monument
- Archaeological Priority Areas
- Area Poorly Provided with Public Open Space
- Areas at Risk of Flooding (Flood Zone 2/ Flood Zone 3 – Environment Agency Mapping <https://flood-map-for-planning.service.gov.uk/summary/517459.98/175589.283>)
- Areas Benefiting from Flood Defences

Key Planning Policies (Local Plan 2017)

SPD's cannot create new policies but instead expand on policies set out in higher plans, notably the London Borough of Richmond upon Thames Local Plan 2017. This SPD relates to a considerable number of higher policies. These policies are referred to below including reference to the equivalent existing policies within the Core Strategy (2009) and Development Management Plan.

It should be noted that the text provides a summary of the purpose of the policy. The full text of each policy can be viewed by way of the web link set out below.

In addition, up-to-date information on the Council's Local Plan can be viewed at: https://www.richmond.gov.uk/services/planning/planning_policy/local_plan/local_plan_review

Policy LP 1 'Local Character and Design Quality'

Outlines the design expectations for development within the borough.

Within the existing Core Strategy (2009) the equivalent policy is CP7 and in the Development Management Plan (2011) the equivalent policies are Policy DC1 and Policy DC7.

Policy LP 3 'Designated Heritage Assets'

Outlines that the borough will require development to conserve and, where possible, take opportunities to make a positive contribution to the historic environment of the borough including Conservation Areas, Listed Buildings, Scheduled Monuments and Registered Parks and Gardens..

Within the existing Development Management Plan the equivalent policies are DM OS 1, DM HD 1 and DM HD 2.

Policy LP 4 'Non Designated Heritage Assets'

The Council will seek to preserve and where possible enhance the significance and character of non-designated heritage assets.

Within the existing Development Management Plan the equivalent policy is DM HD 3.

Policy LP 5 'Views and Vistas'

Seeks to protect and improve the quality of views, vistas, gaps and the skyline which contribute significantly to the character and quality of the local and wider area.

Within the existing Development Management Plan the equivalent policy is DMTC 7.

Policy LP 6 ‘Royal Botanic Gardens, Kew World Heritage Site’

The Council will protect, conserve, promote and where appropriate enhance the Royal Botanic Gardens, Kew World Heritage Site, its buffer zone and its wider setting.

Within the existing Development Management Plan the equivalent policies are OS 4 and DM HD 5.

Policy LP 7 ‘Archaeology’

Seeks to protect, enhance and promote the borough’s archaeological heritage.

Within the existing Development Management Plan the equivalent policies are DM HD 4, DM OS 2, DM OS 3 and DM OS 6.

Policy LP 9 ‘Floodlighting’

Outlines that floodlighting, including alterations and extensions, of sports pitches, courts and historic and other architectural features will be permitted unless there is demonstrable harm to character, biodiversity or amenity and living conditions.

Within the existing Development Management Plan the equivalent policy is DM OS 9.

Policy LP 12 ‘Green Infrastructure’

Seeks to protect and enhance the boroughs green infrastructure.

Within the existing Core Strategy the equivalent policy is CP 10 and in the Development Management Plan the equivalent policies are DM OS 2 and DM OS 3.

Policy LP 13 ‘Green Belt, Metropolitan Open Land and Local Green Space’

Seeks to protect and retain the boroughs Green Belt, Metropolitan Open Land and Local Green Space.

Within the existing Core Strategy the equivalent policy is CP 10 and in the Development Management Plan the equivalent policy is DM OS 2.

Policy LP 15 ‘Biodiversity’

Seeks to protect and enhance the borough’s biodiversity.

Within the existing Core Strategy the equivalent policy is CP 4 and in the Development Management Plan the equivalent policies are DM OS 5.

Policy LP 16 ‘Trees, Woodland and Landscape’

Requires the protection of existing trees and woodland in the borough as well as the provision of new trees, shrubs and other vegetation of landscape significance that complement existing, or create new, high quality green areas, which deliver amenity and biodiversity benefits.

Within the existing Development Management Plan the equivalent policy is DM DC 4.

Policy LP 18 ‘River Corridors’

Seeks to protect and enhance the borough’s rivers, their banks and surrounding environments that contribute to the special and distinctive character of the borough.

Within the existing Core Strategy the equivalent policy is CP 11 and in the Development Management Plan the equivalent policies are DM OS 11

Policy LP 21 ‘Flood Risk and Sustainable Drainage’

Outlines that all developments should avoid, or minimise its contribution to all sources of flooding. The policy goes on to say that flood defences must be retained.

Within the existing Development Management Plan the equivalent policy is DM SD 6.

Policy LP 28 ‘Social and Community Infrastructure’

Outlines that the Council will work with service providers and developers to ensure the adequate provision of community services and facilities, especially in areas where there is an identified need or shortage. It also sets out that the loss of social community infrastructure will be resisted.

Within the existing Core Strategy the equivalent policy is CP 16 and in the Development Management Plan the equivalent policies are DM SI and DM S I 2.

Policy LP 30 ‘Health and Wellbeing’

Promotes and supports healthy and active lifestyles and measures to reduce health inequalities.

Within the existing Core Strategy the equivalent policies are CPI3, CPI7 and CPI8.

Policy LP 31 ‘Public Open Space, Play Space, Sport and Recreation’

Seeks to protect and, where possible, enhance existing facilities and spaces.

Within the existing Development Management Plan the equivalent policy is DM OS 6, DM OS 7 and DM OS 8.

Policy LP 45 Parking Standards and Servicing

Requires new development to make provision for the accommodation of cars, cycles, two-wheel and where appropriate lorries and the provision of electric charging points

Within the existing Development Management Plan the equivalent policies are DM TP 7 and DM TP 8.

SA 22 Pools on the Park and surroundings, Old Deer Park, Richmond

Supports the continued use of the site for sports uses, including improvements and upgrading of

existing facilities. Any proposal would need to be fully justified having assessed the significance of the building and its setting, and having taken into account the wider heritage designations that apply to the site.

Saved proposal site from Unitary Development Plan First Review March 2005: R8 pools on the park intensification of sports use.

SA 23 Richmond Athletic Association Ground, Old Deer Park, Richmond

Supports the continued use of the site for sports uses, including improvements and upgrading of existing facilities. Additional associated leisure facilities and other complementary uses could be incorporated provided they have been fully justified as being necessary to support the continued sporting uses on the site, that they demonstrate meeting identified needs, do not detract from the main use of the site as a sports ground and have been developed to take account of the Metropolitan Open Land (MOL) and historic designations.

All adopted policies and guidance should be assessed for their relevance in respect of individual planning applications, not just those referred to above.

Supplementary Planning Documents and Guidance

There are a number of additional SPDs which provide advice which is of relevance to the Park. as outlined below:

- Design Quality SPD Adopted February 2006 - http://www.richmond.gov.uk/media/7624/spd_design_quality_doc_lowres-2.pdf
- Buildings of Townscape Merit Adopted May 2015 - http://www.richmond.gov.uk/media/7621/buildings_of_townscape_merit_spd.pdf

- Planning Obligations Revised 1st November 2014 - http://www.richmond.gov.uk/media/11608/planning_obligations_spd_july_2014.pdf
- Sustainable Construction Checklist Guidance Document Adopted January 2016 - http://www.richmond.gov.uk/media/8395/scc_spd_guidance_0116.pdf

Other relevant planning guidance includes:

- The Council's 'Public Space Design Guide' (Jan 2006). The overall aim is to provide guidance to help deliver the goal of improved street scene and public spaces - http://www.richmond.gov.uk/public_space_design_guide
- Planning Information for Conservation Areas (2002) - http://www.richmond.gov.uk/media/7644/conservation_areas_spd.pdf
- Thames Landscape Strategy (2012 Review). This can be viewed at - <http://thames-landscape-strategy.org.uk/>. Reach 10 (Isleworth) and Reach 11 (Syon) are of particular relevance for the section of the Thames surrounding Old Deer Park.
- Guidance on Redevelopment of Potentially Contaminated Sites (2003) - http://www.richmond.gov.uk/media/7645/spg_supplementary_planning_guidance-3_contaminated_land.pdf
- Historic Buildings - Maintenance and Repair (2005) - http://www.richmond.gov.uk/media/7647/historic_buildings_maintenance_and_repair.pdf
- Nature Conservation and Development - http://www.richmond.gov.uk/media/7649/spgnature_conserve_master.pdf
- The Council's policy on tree management is set out at - www.richmond.gov.uk/trees

- Delivering SuDS in Richmond (2015) - https://www.richmond.gov.uk/media/3321/sustainable_drainage_systems.pdf

Other information sources

- Old Deer Park, Richmond. The Crown Estate Landscape Strategy 1999 (Landowner document)
- Statement of Significance Richmond Public Baths, Old Deer Park, Richmond JS Conservation Management and Town Planning Limited (Council document)
- Playing Pitch Assessment 2015 Knight Kavanagh & Page (Council Document)
- Playing Pitch Strategy 2015 Knight Kavanagh & Page (Council Document)
- Indoor Sports Facility Needs Assessment 2015 Knight Kavanagh & Page (Council Document)
- LBRuT Biodiversity Action Plan, Richmond Biodiversity Action Group (Partnership document)
- Royal Botanic Gardens, Kew Landscape Master Plan November 2010 (Landowner document)
- Active Design: Planning for health and wellbeing through sport and physical activity. Sport England October 2015.



Listed Obelisks



View from River Thames towpath pedestrian entrance

4. Analysis of the current facilities across the Old Deer Park

In order to inform the development of a framework for the Old Deer Park it is important to undertake an analysis of the existing facilities across the Park to better understand the issues, opportunities and challenges that exist. This Section has been informed by evidence documents commissioned by the Council's planning department, discussions with lessees and users and from responses to previous consultations.

Detailed assessments of the borough's sport, open space and recreational facilities, including playing pitches and play spaces has been carried out. As well as assessing existing provision they look at the future demand for facilities up to 2025. The outcomes were reported in the following reports:

Playing Pitch Assessment 2015 (Knight Kavanagh & Page) - The Playing Pitch Assessment is a detailed assessment and analysis of all playing fields and outdoor sports spaces in the Borough.

Playing Pitch Strategy 2015 (Knight Kavanagh & Page) - Following on from the Playing Pitch Assessment 2015, the Playing Pitch Strategy provides the strategic framework and recommendations for the Borough's playing fields and sports pitches.

The Playing Pitch Strategy and associated assessment are currently being updated. Once finalised these, and any future updates, will be available on the Council's website at http://www.richmond.gov.uk/services/planning/planning_policy/local_plan/local_development_framework_research/sport_open_space_and_recreation_needs_assessment

Indoor Sports Facility Needs Assessment 2015 (Knight Kavanagh & Page) - The Council's Indoor Sports Facility Needs Assessment provides a detailed assessment, including a supply and demand analysis, of indoor sports facilities including swimming pools, sports halls, health and fitness facilities and squash.

Outdoor Sports Provision

The Old Deer Park provides a range of outdoor sports provision focused on the Richmond Athletic Association Ground, the Old Deer Park Sports Ground, and the Old Deer Park Recreation Ground. An analysis of each sporting activity is summarised below.

It should be noted that the reference to 'teams' has been given as an indication of the level and range of groups of users. Their composition in terms of numbers of players ranges from 4 a side for under-sixes to 15 a side for seniors.

Rugby

The current provision for rugby pitches is as follows:

Richmond Athletic Association Ground (Richmond FC and London Scottish FC):

Seven playing pitches of which three are also used as training pitches, all of which are grass and four are floodlit. The number of teams playing at the ground were:

Richmond Football Club (as of 2018)

- 8 senior (6 mens, 2 womens)
- 200 youth players from U13's-U18's
- 300 mini players from U6's-U12's

These comprise mens, womens, boys and girls teams.

London Scottish Football Club

- 5 senior
- 5 junior
- 10 mini

These comprise mens, boys and girls teams.

In addition, the site is used by the Kew Occasionals rugby team, several schools and to host both youth tournaments and a range of corporate rugby sevens event's. The site also hosts the popular Annual Richmond Fireworks Display.

The main pitch was assessed as being adequate whilst the other pitches suffer from drainage issues. The report suggested that there were opportunities to make minor improvements to the maintenance programme and that pipe drainage was needed for the pitches. The level of usage has been identified as being heavy and has resulted in pitches being overplayed. London Scottish FC also suggested that there were opportunities to increase the number of junior and mini teams if more pitches were available. The assessment suggested that the training pitch is operating over capacity by some 16.5 sessions a week, with the remaining pitches operating over capacity by 2.5 sessions per week.

The site is also supported by changing facilities within the main grandstand and the adjacent Pavilion, (which is a Grade II Listed Building). Richmond FC and London Scottish FC both highlight that there are issues relating to changing facilities at the site. Whilst there are 14 changing rooms at the ground of various sizes, the number of teams and their composition in terms of gender and age have an effect on capacity. Furthermore, the buildings on site were viewed as being old and expensive to operate and maintain. In addition there are a number of smaller buildings and structures across the site which impact on the character and appearance of this part of the Park.

Old Deer Park Sports Ground (London Welsh Rugby Club)

One match pitch and two training pitches (one floodlit), all of which are grass. As of 2015 there were 5 senior, 4 junior and 7 mini teams comprising mens, womens, veterans, boys and girls. The main

pitch is operating over capacity by 0.5 sessions per week whilst it was suggested that the mini/midi pitch had capacity for one additional session per week. Training takes place on the match pitch leading to overplay. The changing facilities are considered to be poor in terms of quality and capacity.

Old Deer Park Recreation Ground:

Three pitches are located at the Ground, all of which are grass. None are floodlit and no club teams are located there. The assessment suggests that there is capacity for 4.5 sessions per week, with five sessions available during peak times. The pitches are supported by changing rooms. However these and the pitches on site were viewed as poor by clubs and as such act as a deterrent to their use. In addition there is some overlap with a cricket pitch outfield which is also located on the Old Deer Park Recreation Ground. Casual public use (the area is identified as public open space) was also cited as an issue.



Richmond Athletic Association Ground

Old Deer Park Recreation Ground



Old Deer Park Recreation Ground

Cricket

Old Deer Park Sports Ground

One cricket square is located at the Ground, which is used by Richmond Cricket Club. The Club has increasing membership in both seniors and juniors. The Club's junior teams have begun to use new pitches that have been provided at Christ's School, which the Club manages and maintains for the School. There is no spare capacity at the site as the pitch is well used by the senior team. It is also used on occasions by Middlesex Cricket Club. It is understood that the cricket pitch is in need of quality improvements. The Club uses the changing facilities provided within the main clubhouse on site and considered these to be acceptable. As the main playing season is in the summer it avoids the peak use for rugby and no issues have been identified in respect of capacity of the facility from the Club's perspective. Training nets are also located at the site.

Old Deer Park Recreation Ground

There are three cricket squares at the Ground. There is one non-grass wicket which is the only part of the cricket provision that is currently used. However, it is not currently used for matches. The assessment identifies that there is spare capacity but that the squares are of poor quality and there is no current use of the grass pitches. Improved maintenance could potentially increase usage. However the outfield overlaps with the football and rugby pitches that are also located at the Ground. As with the rugby analysis above the changing rooms are considered to be poor which potentially inhibits greater use. Whilst not specifically identified in the report the location of the squares within a wider area of public open space provides some challenges in terms of their protection.

Tennis

Old Deer Park Sports Ground

The Ground has 13 tennis courts; 6 grass (open early May to early September), 4 hard and 3 floodlit Tiger Turf all weather courts. It is home to the Richmond Lawn Tennis Club. The Club uses the changing room facilities located in the main clubhouse. As of 2015 it had 259 senior members and 114 junior members. It has four men's and three women's teams. As with other clubs across the borough there is no assessed latent demand for additional courts at the site. However, the club suggested that if the standard of its ancillary provision (i.e. changing and other facilities) improved then membership would increase as a direct result.

Old Deer Park Recreation Ground

There are six grass courts and five hard courts located within the Old Deer Park Recreation Ground, located to the rear of the Pools on the Park complex. These are for public use. None of the courts are floodlit. The courts are managed by the Council and do not require membership to use. More information is available at <https://clubspark.lta.org.uk/OldDeerPark>

Football

The Old Deer Park Recreation Ground has three grass football pitches which are available for community use. There is an assessed capacity for five additional sessions per week, two of which are at peak times. This is within the context of there being capacity for additional sessions on existing pitches across a significant proportion of the borough. The assessment indicated that people viewed the changing facilities as being of poor quality which may give some explanation as to why there is spare capacity (this is the same issue as identified in the analysis of the rugby pitches above).

Golf

The Royal Mid-Surrey Golf Club provides two eighteen hole courses. It is a club owned by members but welcomes both visiting societies and visitors paying green fees and actively encourages new members. With 300 lady golfers, its membership has one of the highest percentages of female players in the country, as well as having one of the largest junior sections. The Club's Academy programme, with Junior and Senior sections, openly welcomes applications from the local community, most of whom have no previous association with the Club. The Junior Academy takes boys and girls from the age of 5 up to 16 and currently totals 45 in number. The location of parts of the site close to the Thames results in some water inundation due to the lack of storm drains along this stretch of the Thames.

Bowls

A bowls green and pavilion is located at the Old Deer Park Sports Ground, and is home to the Mid Surrey Bowling Club. As of 2015 it had 37 members. As such the current green would be able to accommodate new members, which it is understood would be welcomed.

Archery

The Old Deer Park Sports Ground is home to the Royal Richmond Archery Club. It has a mixed membership of all ages from age 10 upwards. It shoots outdoors throughout the summer season (mid-April to mid-September) and on certain dates throughout the winter. As it uses one of the rugby pitches on the site as its field facilities there is currently little scope to increase the level of usage on the site based on the current site facilities available. During the winter it has one indoor session a week on a Sunday afternoon, which is currently held at Richmond-upon-Thames College.

Running

The Old Deer Park Recreation Ground is regularly used for 'Parkrun' activities which are popular with people of all ages.

Indoor Sports facilities

Swimming

The Park is home to the 'Pools on the Park'. It has an 33.5m length indoor pool with six lanes, an outdoor 33.5m length pool (with a stepped profile which effectively reduces its length for swimming purposes), also of six lanes and an 12.8m long indoor learner pool. It also has an enclosed lawn area. It provides a mixed programme of lane and general swimming, schools swimming, club access, lessons and classes with some sessions targeted at specific user groups. The complex is Grade II Listed. It is a public facility, one of only three within the borough. The others are located at Teddington and Hampton, the latter of which is an outdoor lido, but which is open all year round. Consequently the Pools on the Park is an important public facility.

The 2015 Indoor Sports Facility Needs Assessment identified a number of issues in relation to the Pools, including that it currently operates at capacity at peak times whilst the situation was exacerbated during the winter months when the lido element of the Pools was closed and swimmers are less inclined to swim at Hampton Pool, there have been recent changes which have extended the outdoor pool season. The main and learner pools are extremely busy at all times of day and classes are regularly oversubscribed. There is demand for club swimming and more water space would be taken if it were available.

The Pools complex was constructed in the 1960's. It has undergone several refurbishments and is in relatively good condition for its age. Nevertheless, concerns have been identified that the age of the facility could make it expensive to maintain. The assessment makes reference to a Sport England Facilities Planning Model being undertaken for the London Borough of Richmond upon Thames which

used 2014 National Facilities Audit data. The model provided a useful starting point in identifying a number of issues pertinent to the Pools on the Park complex including that:

- Pools on the Park, is one of the oldest swimming pools and therefore creates concerns over its ability to meet the needs of residents in the long term. It also indicated that without significant investment, the cost of running these facilities was likely continue to increase.
- The level of unmet demand in the borough is the equivalent of 1 lane of a 25m swimming pool across the whole of the authority's area. Although this amount was not considered to be a significant deficit in provision.
- The FPM report concludes that the vast majority of the borough residents can have their swimming needs met, although a significant proportion of this satisfied demand occurs at swimming pools outside of the borough.
- The study identified that a key challenge for the borough going forward would be to maintain a quality offer for residents with an old stock of swimming pools in place. The challenge was considered to be particularly pertinent at Pools on the Park (and Teddington Pools and Fitness Centre) with both sites having low attractiveness ratings which would be likely to decrease without significant investment.
- The study identified an opportunity to engage with swimming clubs who require the increased use of facilities.
- A temporary roof over the lido at Pools at the Park could facilitate use during the winter months to improve capacity.
- It suggested that from a recreational perspective there was an opportunity to provide a new 50m pool at Pools on the Park.

Pools on the Park



Health and Fitness Facilities

Pools on the Park

As well as swimming the Pools on the Park complex also hosts health and fitness facilities. It has 50 stations (a station is a piece of static fitness equipment such as a step machine or cross trainer). The facilities are not available for casual users. The assessment suggested that the gym facilities required investment to match the standards in other membership facilities. Whilst there are several studios at ground floor, opportunities to add group fitness space was also identified. From conversations during earlier consultations the lack of disabled access to the stations was also identified (they are located at first floor and there is no lift access). Users of the facility have also identified issues with the configuration of the changing facilities and that users have to pass through the 'wet' changing areas to access facilities.

Health and Squash Club at Richmond Athletic Association Ground

A health and fitness facility is located at the Richmond Athletic Association site. It has recently changed operator and is currently run as Olympus Health and Squash Club. It provides a wide range of equipment ranging from over 30 'traditional' stations through to a punchbag/abdominals area. It also has a large studio which is available for hire. (For squash facilities see below). The design of the current building together with the adjacent car parking do not make a positive contribution to the character and appearance of this part of the Park.

The Indoor Sports Facilities Needs Assessment set out that the borough currently has a total of 1061 fitness stations across all sites. Based on the average national UK penetration rate, both at present and in the future (2024 & 2037) demand appears to be catered for.

However, if national targets for activity levels increase then higher penetration rates could be achieved in the future, although the borough currently has some of the highest current participation rates in England. It should therefore be assumed that penetration rates are likely to be significantly higher than the national average leading to greater demand and a need for additional fitness facilities. This would suggest that the level of provision across the Park needs to be maintained and that there could be potential for enhancement.

Squash

Health and Squash Club at Richmond Athletic Association Ground.

The site provides five squash courts. The courts are considered to be in good condition.

Old Deer Park Sports Ground

Two squash courts are located at the Sports Ground and membership is required for their use. The design of the current building is functional and does not contribute to the character and appearance of this part of the Park.

There is no evidence of unmet demand for squash in Richmond. Whilst the supply of courts located at clubs where a membership is required indicates that there is a continuing interest in the sport, discussions with the Sports Ground management organisation indicated that membership at the facility has been declining.

Other indoor sports needs

The assessment indicated that there is a potential shortage of indoor sports space across the borough to accommodate a range of activities. In particular there is a shortage of access to facilities during the day as much of the current provision is located on school sites.

Community and Voluntary Sector Uses

The Old Deer Park is home to a range of community/voluntary sector uses.

Old Deer Park Car Park

The car park contains a number of buildings which are home to a range of community/voluntary sector uses as follows:

- North Richmond Scout Group
- St Johns Ambulance Brigade
- 144 (Richmond) Squadron Air Training Corps (ATC)
- Richmond Sea Cadets

Two further buildings are located in the area, one of which was previously occupied by the Royal British Legion and the other provided public toilets. Neither are currently occupied/in use.

The community/voluntary sector buildings are varied in style and design. Due to their age they are beginning to require maintenance and are inefficient to heat, the costs of which are borne by the occupiers. In addition, the configuration of some of the buildings does not provide efficient and particularly usable space. Several of the users have sought to improve their accommodation through the installation of portakabins. The buildings are of a functional design and several which are currently vacant are in need of repair. As such, they impact on the character and appearance of this part of the Park.

Old Deer Park Recreation Ground

A nursery school is located on the edge of the Old Deer Park Recreation Ground, behind the Pools on the Park complex, and forms part of the building which also contains the Recreation Ground changing facilities.



Community sector buildings



Footpath from Richmond Green



Community sector buildings

Wider considerations

Royal Mid-Surrey Golf Club

A large proportion of the Park is occupied by the Royal Mid-Surrey Golf Club, which hosts two 18 hole golf courses. The Club was established in 1892. The courses were designed and constructed by JH Taylor who was five times Open champion and is still one of the foremost golfing legends. The use of gentle discrete contouring known as “Taylor mounding” became, and remains, a common design feature adopted by golf course architects worldwide. The monastery built by Henry V was located where the 14th and 15th holes are now played and the Grade I Listed King’s Observatory is located within the Club grounds. Herbert Asquith (Prime Minister 1908-1916) was a member which led to the Club being the focus for several actions by Suffragettes, as was Viscount Cave who, as Home Secretary introduced the Representation of the People Act 1918, which gave women the Vote. Countess Cave was the Club’s first Lady’s Captain.

The introduction of golf on the site resulted in changes to the essence of the original Arcadian landscape, through the construction of the tees, fairways, greens and associated bunkers and through the introduction of non-native tree planting. However, a programme is now in place to remove non-native planting in a phased manner and the courses have now been cleared of all Leylandii which were a common feature of golf courses. Over the last decade, far more trees have been removed than have been planted as the Club has pursued a policy of returning areas to grassland - particularly fine acid grasses. Where tree planting does take place, the Club consults with the Royal Botanic Gardens, Kew on species and, more recently, selective tree planting around the Kings Observatory boundary has been planned. This forms part of the Club’s long term ecological strategy for the courses.

Low-level scrub planting along the boundary of the Club with the Old Deer Park Recreation Ground and towpath has impacted on the ability to ‘read’ key elements of the Park’s history. As a result, it is only possible to gain glimpses of The King’s Observatory at limited points which affects the integrity of the views along the meridian lines, denoted by the Listed Obelisks. There are, however, challenges in maintaining these without adversely impacting important fauna located in the area.

A service road serving the Royal Botanic Gardens, Kew is located to the north of the Old Deer Park Sports Ground and a small section of the northern boundary of the Golf Course. This route also provides access to informal parking spaces and pedestrian access to the Sports Ground, but is not open for wider public access. The potential to provide access between Kew Road and the towpath in this general area is a community aspiration. However, there are a significant number of challenges that would need to be overcome in order to achieve this.

Old Deer Park Recreation Ground

The Old Deer Park Recreation Ground is designated as public open space. The northern part of the area is used for more formal recreation as set out earlier in this section. In addition there are a number of oak trees lying to the west which are aged specimens that offer significant amenity and provide an important ecological habitat. The southern end of the Recreation Ground has a more parkland character and is used for more informal recreational activities such as dog-walking, picnicking and informal games. A footpath runs across the southern end of the ground. This provides not just an important link from the towpath into the Park but also provides a route for residents of St Margarets to access central Richmond via the footbridge at Richmond Lock. This part of the Recreation Ground in particular also provides an important area for biodiversity and ecological interest including along the banks of the water-filled

ha-ha located along the boundary with the towpath.

As set out above a number of sports pitches are located within it. This potentially creates tensions between the various uses within the Recreation Ground. For example the location of the pitches within a wider open space means they are regularly used by the public for dog walks and the like which is thought to limit the level of use that could otherwise be achieved. Furthermore air quality issues exist along the A316. In 2000 the whole borough was declared an Air Quality Management Area (AQMA) and as outlined in the Council’s most up to date report to DEFRA (2013) the A316 exceeds the annual average NO2 objective. This, together with the speed of vehicles travelling along the A316 (the speed limit is currently 40 mph) adjacent to the Recreation Ground can create a perception that parts of the area are less safe to use. This could impact on people’s desire to make use of what is an important public facility.

More information on air quality can be viewed at: http://www.richmond.gov.uk/services/environment/pollution/air_pollution/air_quality_reports

The Recreation Ground is also used to support a number of events during the year which have a sporting focus, such as the Richmond Half Marathon. However, there are challenges in terms of access for vehicles that need to get into the site to set up marquees, sound systems and other supporting infrastructure, including that they have to use a narrow access road alongside the children’s play area.

An issue that has also been identified is the lack of toilet facilities within, or in close proximity to the Recreation Ground and the resultant difficulties that this can bring for Park users.

Access from the A316

The Pools on the Park complex, Richmond Athletic Association Ground and the Royal Mid-Surrey Golf Club are all accessed off the A316. The present

junction design provides only limited space for queuing both from the A316 and from this part of the Park onto the A316. In addition there is potential for vehicle conflict because of the proximity of the access points for the three facilities. Egress from the Richmond Athletic Association Ground onto the A316 has extremely restricted sight lines in a northerly direction which creates potential conflicts between vehicles leaving the site and cyclists and pedestrians. Issues have also been identified in relation to the current limited provision of access for vehicles to the Old Deer Park Recreation Ground to support events and potential for conflicts with pedestrians using the children’s play areas and tennis courts to the rear of the Pools on the Park complex.

The Old Deer Park Car Park and public open space

The car park provides an important facility which supports both central Richmond and the Park itself, particularly on match and event days. Because of the location of the community/voluntary sector buildings the car park is disjointed in terms of its flows and opportunities for provision of landscape improvements to soften its appearance is limited, particularly because the parking spaces are relatively narrow in width in comparison with the size of modern vehicles. In addition, the number of signs and their design, together with a lack of a co-ordinated approach to the design and finish of street furniture impacts on the character and appearance of this part of the Park.

The area to the south of the car park leading down to the River is more naturally landscaped and forms part of the public open space within the Park. Consequently it is an important feature but is less well used than other parts of the Park. An informal ‘path’ has been created as a result of people walking through the area to access the River. There could be opportunities to create a more attractive pathway if its design and use of materials were sympathetic to its landscape setting.

5. The Future Role of the Old Deer Park

There are opportunities to sustain the significance of the historic landscape of the Park and the features it contains, as well as supporting its wildlife and nature conservation role, improving the sports, recreation and community facilities and enhancing access into and around the Park.

The Council will work with the landowners and leaseholders to ensure that any future proposals:

- contribute to preserving and enhancing the special historic character of the park;
- contribute to the improvement of the health and wellbeing of residents through the provision of (and improvements to existing) sport, recreation and opportunities to take part in physical activity with the Park;
- have regard to planning policy;
- respond to constraints and maximise opportunities including for enhancement of biodiversity;
- take into account the views of the local community.

There are also opportunities for wider enhancements, not linked to development proposals, particularly with regard to biodiversity, landscaping, access and signage, all of which are considered in this section. The Council will work with the key stakeholders with an interest in the Park to secure implementation of these through voluntary agreement.

In addition to the guidance provided within this SPD development proposals and enhancements will need to respond to, and will be considered against (where appropriate) national policies and guidance (particularly with respect to designated and non-designated heritage assets), policies contained with the London Plan and relevant guidance, the London Borough of Richmond upon Thames Local Plan 2017 and any relevant supporting documents and guidance. Requirements with respect to the information to be

provided to support the submission of planning or other applications for formal consideration by the Council as local planning authority (including its Local Validation Checklist) are set out on the Council's website at https://www.richmond.gov.uk/services/planning/make_a_planning_application#step3

The SPD now considers the following key opportunities:

Improving the Quality of Old Deer Park

The previous Sections of this SPD have provided a context from which this Section has been developed. It is important to look at the Park as a whole and how the different areas within it interact. This provides the greatest opportunity to secure a coherent set of enhancements to the Park and its facilities. Alongside the improvements to sport and community facilities within the Park, which are discussed later in this Section, there are real opportunities to improve the landscape setting and the legibility of the Park for its users and biodiversity.

A number of issues have been raised by stakeholders associated with the quality of the Park including, but not limited to:

- the lack of clear and celebrated entry points into the Park
- difficulties in navigating the different parts of the Park
- limited information within the Park of some of its historic features
- shrub growth/tree screening which impacts on the legibility of historic views and vistas
- limited areas that support nature conservation and biodiversity objectives and limited information about the biodiversity of the site, including its ecosystems.
- the visual impact of areas such as the Old Deer Park Car Park and the Richmond Athletic Association Ground



Old Deer Park Sports Ground entrance



Kew Foot Road boundary wall



Meridian Line marker with listed obelisk behind



Wayfinding

The following opportunities for enhancement have been identified:

Gateways

Opportunities exist to improve the important historic or community roles that the Park plays within the borough.

The two main access points are at the southern end of Park Lane (which provides vehicular as well as pedestrian and cycle access) and from Richmond Green through the side-gate of a well restored, late Victorian gateway, comprising the four original brick piers, with modern steel gates which leads to a bridge over the railway line.

The access into the Park from Park Lane (which acts as the main entrance into the Park from central Richmond) is marked by two surviving gate pillars of the original four. However, these are 'lost' as a result of the placement of physical access management devices such as headroom restriction and access barriers, and signage. Opportunities to re-instate the two missing gate-piers should be explored. The quality of buildings and boundary screening in close proximity to this entrance also impact on its appearance. There are opportunities to replace the management devices in a more sympathetic way to reflect the Park's historic designations and its role as a key gateway that should be celebrated. The access from Richmond Green would benefit from periodic maintenance of the existing Coxwell gravel.

Pedestrian access into the Park at its southern end, from the towpath and from the A316, is not well defined. As such there is scope to improve the access and visibility of the Park through the marking of gateways, including from the Riverside, or their enhancement. Pedestrian entry-points into the Park should be more clearly defined and celebrated. However, these need to be balanced against the more natural landscape context within which they are located.

Views and Vistas

There are a number of important Views and Vistas across the Park. These are primarily related to The King's Observatory and the related meridian lines, (which are denoted by a number of obelisks located at different points within the Park) and to the Pagoda within the Royal Botanic Gardens, Kew (which is a Grade I Listed Building and is a landmark within the wider area). However, these have been obscured over the course of time, including as a result of the encroachment of scrub vegetation along the towpath and within the Royal Mid-Surrey Golf Club. In addition tree overhang along the towpath including between, the Old Deer Park Recreation Ground and the Royal Mid-Surrey Golf Club also has an impact. There are real opportunities to improve/open up these views and vistas by appropriate removal or pruning of trees and vegetation although there are some areas where this needs careful consideration to ensure that it doesn't result in disturbance to important fauna. 'Grow back' has occurred following previous clearance works. There is therefore a need to introduce a regular maintenance regime for these areas.

Wayfinding and Interpretation Signage

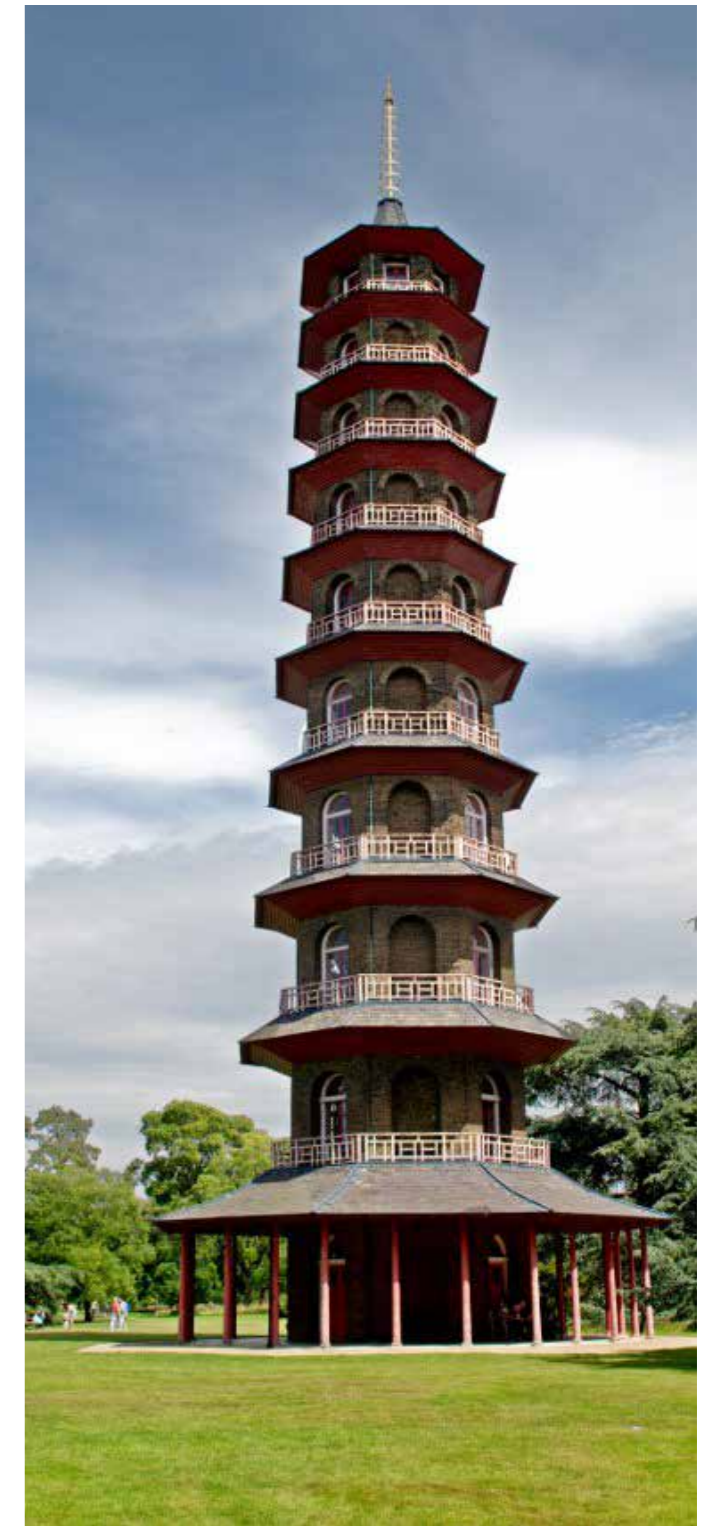
There is scope to improve Wayfinding and Interpretation boards across the Park. This includes clearer direction to key facilities as well as celebrating the history of the park and its key features through interpretation boards. Boards could provide clear information to help people better understand the areas historic significance. In particular there are opportunities to provide information on, and better identify the views to The King's Observatory from within the Park and from adjacent areas. This could reflect the approach taken by the Crown Estate 'marker' on the towpath. However, these are need of maintenance.

Enhancements to car park areas

The Old Deer Park car park is an important facility for visitors to both central Richmond and to the Old Deer Park. However, there is only limited landscaping within it and the area is interspersed by a number of unattractive ancillary buildings, structures, fences and signage. Emphasis should be placed on reducing the visual impact of the large surfaced areas devoted to car-parking and associated visual clutter. This includes opportunities to remove excessive signage and replace necessary signage using a more sympathetic design. A more co-ordinated approach to the design and finish of street furniture consistent with the Council's Public Space Design Guide would also provide opportunities to enhance the visual appearance of the area.

Biodiversity and Landscaping

The ecological value of Old Deer Park should not be underestimated. It provides a habitat for numerous species and contributes to local biodiversity. Part of the Park is identified as a Site of Metropolitan Importance and the remainder is a Site of Borough Importance within the London Borough of Richmond upon Thames Biodiversity Action Plan. This biodiversity should be protected and enhanced, for example, through habitat creation and habitat management. Areas to the south of the Park, within the Old Deer Park Recreation Ground, and which are used for more informal recreation activities, could provide opportunities for the provision of more natural planting. This would help to not only provide habitat diversification, but would also help to visually 'break up' the large tracts of grassed areas to provide more interest. The River Thames towpath and the adjacent Ha-Ha make an important contribution to both the biodiversity of, and landscape setting to, the core of the Park.



The Pagoda

Enhancements to the historic landscape, especially its contribution to the setting and buffer zone of the Royal Botanic Gardens WHS, will be important.

The existing and potential nature conservation value of Old Deer Park should be enhanced wherever possible by informally landscaping with locally native species which, where appropriate, should reflect those planted as part of the 18th century parkland design such as within the Royal Mid-Surrey Golf Club part of the site. This is an important factor in achieving a greater recognition of the fact that the Old Deer Park and the Royal Botanic Gardens, Kew were originally an integrated landscape area (as reflected by the Historic Park and Garden designation which encompasses both areas within the one designation).

Tree planting could assist with mitigating the visual and acoustic impact of vehicular traffic using the A316 and should be explored. This should not however impinge on Vistas and Views, or create an inappropriate visual separation between the areas of the Park located on either side of the A316. Whilst these two areas were physically separated by the construction of the A316 in the 1930's their visual relationship should continue to be considered, and where possible, enhanced. There are also potential opportunities to reintroduced tree planting along the boundary between Kew Foot Road and the Richmond Athletic Association Ground. In doing so careful consideration would need to be given to the species of tree and spacing to reflect the original parkland features.

Historic Features

As well as the remaining gate piers at the Park Lane entrance referred to above there are a number of other important features. It is important that these are recognised and that management regimes across the Park reflect their historic importance. These include:

- boundary walls along Kew Foot Road, and between the Old Deer Park Sports Ground and properties in Old Deer Park Gardens
- the Ha-Has between the Royal Botanic Gardens, Kew and the Royal Mid-Surrey Golf Club and along the boundary between the Old Deer Park Sports Ground and Kew Road, and between the towpath, Old Deer Park Recreation Ground and Golf Course
- the brick gateway piers at the access into the Old Deer Park Sports Ground
- the Parks historic trees, which acts as 'Living Monuments' and offer significant amenity.

Site Signage

Different organisations have provided signage to advertise their activities, upcoming events and promoting site sponsors. This has contributed to a sense of visual clutter and urbanisation across parts of the Park. Opportunities should be taken to achieve a balance between promoting the activities and events on these sites and providing signage which is more complimentary to the historic environment within which they are located. Particular opportunities for enhancement exist at the Richmond Athletic Association Ground and the Old Deer Park Sports Ground.



Obelisk (unlisted) with Royal Mid-Surrey Golf Course boundary behind



Gated entrance to the Old Deer Park from Richmond Green



Wildlife within the Old Deer Park

Improving Access within Old Deer Park

Improvements to access and movement across the Park would provide benefits to existing users and may make the Park more attractive as a destination.

Pedestrian Access

The existing footbridge across the A316 between the Old Deer Park car park and the Pools on the Park provides stepped access. A number of issues have been identified with the bridge as follows:

- It does not provide for the needs of those with mobility impairments, cyclists and people with prams.
- It does not fit well in terms of its location, including providing clear links between Richmond Green and the Old Deer Park Recreation Ground and as such does not reflect desire lines.
- Access through and from the Old Deer Park car park is convoluted and unclear.
- It provides a key gateway feature into Richmond but its current design does not reflect this.

Opportunities for replacing the existing bridge should be explored in order to address the above issues. In doing so consideration would need to be given to:

- its relationship with the Old Deer Park car park and access to ensure that the operation of the car park is not compromised.
- Its relationship with the Pools on the Park complex and its setting.
- Its context within the wider historic landscape setting.
- Being of sufficient height so as not to compromise the operation of the A316.

Recognising the challenges that the above places on the re-provision of the bridge other opportunities to improve access across the A316 between the

two parts of the Park should also be explored. Consideration should be given to reducing the speed limit along this part of the A316. This could provide benefits including improving the perception of safety and the dominance of traffic for users of the Old Deer Park Recreation Ground, to local Air Quality and safer vehicular access and egress into the Old Deer Park car park.

At present there is no clear and safe pedestrian access between the A316 and the play areas and tennis courts to the west of Pools on the Park. Opportunities to provide a new link close to the boundary with the Pools should be explored.

A pedestrian underpass under the A316 exists towards the southern end of the Park linking the two parts of the Park on either side of it. At present the underpass is only opened on limited occasions to support running events. More regular opening would provide for improved access between the two sides of the Park as the current access under the road and railway closer to the River suffers from waterlogging, making it an unattractive and sometimes impassable route. This latter issue could also be addressed through the provision of boardwalks.

At present there is no direct access from the River into Richmond/Kew between Twickenham Bridge and Kew Bridge. Provision of a link is a community aspiration. However, it is recognised that there a number of topographical, legal and health and safety challenges that would need to be overcome to achieve this.

Vehicular Access

The two main access/egress points serving the majority of the Park are from the A316. The first is from the northbound carriageway into the Pools on the Park, Richmond Athletic Association Ground and Royal Mid-Surrey Golf Club and events area in the Old Deer Park Recreation Ground. As identified in

Section 3 above there are a range of issues relating to both capacity and safety associated with the current configuration. A collaborative approach to resolving these issues needs to be taken by the relevant stakeholders.

The second access/egress point on the A316 serves the Old Deer Park car park. The access/egress point lies just south of the change in road speed from 30mph to 40mph on the southbound carriageway. This can make it difficult for cars to access across the A316 and leave from the car park easily and safely. This is compounded by the fact that some pedestrians cross the road at this point because it is more direct, even though there is no formal crossing point. In addition queuing traffic can contribute to the air quality impacts in the area. The suggestions earlier in the Section in relation to both speed limits and improving crossing points could potentially help to manage these issues better.

Opportunities to improve cycle access should be explored although this would need to avoid creating conflicts with pedestrians.

Parking Provision

Any development proposals for the Park will need to ensure that an appropriate level of car parking is retained. This is particularly relevant to the Old Deer Park car park site to ensure that it continues to support the vitality and viability of central Richmond.

In addition, opportunities should be taken to increase cycle parking provision within all of the areas car parks in order to improve opportunities for cycling.



Views to Old Deer Park car park



Pedestrian access to Old Deer Park Sports Ground and service road access to Royal Botanic Gardens, Kew

Outdoor Sporting Facilities at Old Deer Park

The existing outdoor sports facilities at Old Deer Park are focused predominantly at the Richmond Athletic Association Ground, the Old Deer Park Recreation Ground, the Old Deer Park Sports Ground and the Royal Mid-Surrey Golf Club.

Opportunities for Improvement:

Pitch Provision

As set out in Section 3 above there are issues of capacity and quality in terms of the current rugby pitches at both the Richmond Athletic Association Ground and the Old Deer Park Sports Ground. Both Grounds are physically constrained such that there is no scope for increasing the number of pitches that they can provide. However, capacity does exist on the pitches located within the Old Deer Park Recreation Ground.

The evidence base suggests that there is sufficient capacity within the borough, and within the more local Richmond/Kew area, to support the need for football pitches.

There could be opportunities to review the current pitch configuration and pitch use in the Old Deer Park Recreation Ground in relation to their use for rugby, providing the opportunity to focus resources on the improvement and management of the pitches to widen their appeal. Because of their proximity to the existing rugby clubs, this approach would provide the potential to increase the number of pitches available at peak times to those clubs, as well as to local schools within the area. Any re configuration should take account of other activities, including the regular 'Parkrun'.

In order to support the issues of overplay, which itself impacts on capacity, opportunities to better

maximise the use of some pitches, primarily within the Richmond Athletic Association and Old Deer Park Sports Grounds, could be achieved through the provision of World Rugby Regulation 22 Artificial Grass Pitches (AGP). In doing so consideration would need to be given to their location and the colour of surface material in order to minimise their impact within the wider historic landscape. In respect of location, areas to the periphery of the sites, where they are less publicly visible should be explored. Taking the above approach would provide for a more integrated approach to provision across the Park to address the capacity issues identified whilst taking into consideration operational issues (including minimising organic contamination and distance from changing rooms).

Floodlighting can help to address capacity issues and it is recognised that both grounds already have some floodlighting. However, increased provision could cause harm to the wider historic landscape, adversely affect the significance of the heritage assets, and adversely impact on the living conditions of adjoining residents and areas important for biodiversity. In order to address these issues consideration should be given to developing site-wide floodlighting strategies for each ground to demonstrate how these issues can be addressed. Any proposed additional provision must have regard to Local Plan policies LP 3, LP 6 and LP 9 in particular. This could include, for example through making best use of the latest technologies in terms of height and design of columns, maximising pitch coverage whilst limiting light spillage, limiting the times when lighting will be used and use of energy efficiency devices.

Changing Room provision

From the evidence set out in Section 3 there is clear potential to enhance the quality of changing room facilities at the Richmond Athletic Association, Old Deer Park Sports and Old Deer Park Recreation

Grounds. Enhancement could have potential benefits both from a sporting and historic perspective.

Richmond Athletic Association Ground

The current facilities are provided within a 1950's grandstand and in the adjacent pavilion, which is a Grade II Listed Building. Richmond Athletic Association has indicated its desire to redevelop the grandstand to provide for 21st century facilities. At present the grandstand is located in the centre of the ground and has an east/west orientation. This aligns with the orientation of the match pitch which it supports. The grandstand is one of few cantilevered grandstands erected in Britain before the 1970s, and the only British example of a reinforced concrete grandstand seen more commonly in post war Continental Europe. Any redevelopment proposal would therefore need to consider the history of the grandstand within the wider context of the Old Deer Park in terms of its heritage value and heritage assets (i.e. its location within a Grade I Historic Park and Garden, and Conservation Area, and its proximity to a Grade II Listed Building), the planning policy context including Metropolitan Open Land considerations in respect of openness and character, and wider public benefits that might arise as a result of a redevelopment of the grandstand. As the grandstand is located within a Conservation Area, planning permission would be required for its demolition.

Any redevelopment of the grandstand has to demonstrate wider benefits that would be secured as a result. To this end consideration should be given to relocating the facility to the south-western part of the ground, adjacent to the Royal Mid-Surrey Golf Club boundary, and be located as close as possible to the Golf Course access road. This would potentially allow for the reorientation of the match pitch so that it runs north-south (which is the ideal in terms of playing pitch orientation). This configuration would



Old Deer Park Sports Ground



Old Deer Park Recreation Ground Cricket Wicket



Pools on the Park

provide a 'tighter' grouping of buildings (when taken with the Pools on the Park and the Royal Mid-Surrey Golf Course clubhouse), which in turn is considered to improve the overall 'openness' of the site and Park. It would also move the grandstand further away from existing residential properties. Relocation of the grandstand would allow making use of the strong tree screen along the boundary as a backdrop by reducing both the buildings' and any associated floodlighting's potential impact within the wider landscape.

Taking such an approach would open up public views from the south across to the Pagoda within the Royal Botanic Gardens, Kew, which is a landmark of importance within the wider landscape and provide opportunities to create a greater visual integration between the northern and southern parts of the Historic Park and Garden. In addition, relocating the grandstand would allow for the Grade II Listed Pavilion to be returned to its original context and setting. These wider benefits are balanced against any potential impact of the preferred location in respect of views across the Park from Kew Foot Road, and the Richmond Royal Hospital in particular. In particular longer views across the Park are limited from this point as a result of the tree screening within the Royal Mid-Surrey Golf Club.

Any redevelopment should maximise opportunities to provide improved changing facilities, which reflect the age and gender of the numerous teams that it would support, and seek to integrate ancillary facilities, including refuse storage, as part of the design. This would provide 21st century facilities and reduce the visual clutter that currently exists on the site, which would also improve the openness and character of the Park in support of heritage and planning policy objectives. The redevelopment of the grandstand would have to be carefully considered against all relevant planning policies, and any material increase in the size of the grandstand would have to be justified with regard to national policy and the policies of

the development plan, particularly in relation to Metropolitan Open Land. The removal of existing buildings and structures on the site could provide a benefit and be taken into consideration in this regard. The overall height, scale, massing, materials and finishes of any new development will be key considerations in any redevelopment proposals.

Any reconfiguration of the pitches would need to take into account the issue of capacity and overplay. Improvements to the drainage of the pitches, which are affected by the high water table, should be made. Any reduction in the overall playing and training capacity on the site is likely to be a concern for Sport England and the Rugby Football Union (RFU). Consequently, working with the Council, which operates the Old Deer Park Recreation Ground pitches, should be explored as a potential opportunity to enhance capacity. Furthermore, the provision of one or more AGPs may be sufficient to satisfy those concerns, given that AGPs can support greater use of individual pitches, subject to the AGPs and their design not adversely affecting the significance of the heritage assets. The provision of AGPs could address issues of pitch quality and maximise opportunities to widen the level and regularity of use. This approach could widen the opportunities for local organisations and educational establishments to use the facilities, particularly during the week, through a 'Community Use' Agreement, for example.



Richmond Lock footbridge, Twickenham Bridge and Richmond Railway Bridge

As with the Richmond Athletic Association Ground, there is no physical capacity to increase the number of rugby pitches on the site. There could be potential for the second pitch surface to be changed to an AGP which would be a way of addressing some of the capacity and overplay issues. The same considerations as set out for the Richmond Athletic Association Ground regarding the historic landscape would need to be considered. Further opportunities to increase floodlighting on the site are likely to be limited due to the site's proximity to the boundary with the Royal Botanic Gardens, Kew, and in particular the location of the site to the south of a key View within the Gardens leading down to the Pagoda.

Old Deer Park Sports Ground

The existing clubhouse provides changing and other facilities for the clubs on site (with the exception of Outdoor Bowls which has its own pavilion). The Old Deer Park Sports Ground Limited, which oversees the running of the site, has indicated that it wishes to enhance its existing facilities rather than redevelop them. The current configuration of the building significantly reduces the opportunities to improve in particular the quality and quantity of changing room accommodation as well as for medical facilities. The existing building is 'U-shaped'. Opportunities exist to infill the 'U' to enable the current internal arrangements to be reconfigured without extending beyond the current extent of the building. Bearing in mind the close proximity of the Old Deer Park Sports Ground to the boundary of the Royal Botanic Gardens, Kew this could provide a sympathetic solution to improving the accommodation needs without compromising the wider historic context, including of protecting views of the Pagoda, which lies just to the north of the ground. It could also provide the opportunity to remove some existing ageing and unattractive buildings/structures, including the squash court, within close proximity to the main clubhouse and allow for improvements to the car parking arrangements.

Subject to structural and flood risk assessments there could also be opportunities to provide some additional facilities below the existing grandstand, without compromising the historic and Metropolitan Open Land designations. Opportunities also exist to improve the external appearance of the clubhouse, including through the use of less visually dominant cladding materials.

The Old Deer Park Recreation Ground

Ways of improving the quality and capacity of the rugby pitches within the Old Deer Park Recreation Ground are set out above. In addition the analysis of issues set out in Section 3 has identified the current quality of the changing facilities supporting the Recreation Ground as being a significant deterrent to the use of the playing pitches.

There are potential opportunities to significantly improve the changing room facility offer by taking, for example, a more integrated approach with the operation and management of the Pools on the Park complex. Alternatively, the potential relocation of some community uses to the area occupied for rounds maintenance services (see Page 30) could provide opportunities to create a 'hub' to improve those facilities and support more active surveillance of this area. Refurbishment or redevelopment of the facilities could be undertaken without impacting on the significance of the Pools on the Park or its setting as a Grade II Listed Complex.

Further information in respect of the significance of the Pools on the Park complex from a heritage perspective is explored in more detail below.

By taking a more integrated approach, opportunities could exist which allow access to toilet facilities and provision of storage facilities to support the wider use of the Recreation Ground, including activities such as 'Parkrun'. It would also help to support the opportunities identified above for focusing the use



Footpath from Thames Towpath



Old Deer Park Recreation Ground Playground



Old Deer Park Recreation Ground rugby pitches

of the sports pitches for rugby to provide ‘overspill’ opportunities for the existing rugby clubs within the Park and for local schools.

Any proposals for the introduction of floodlighting within this part of the Park would need to demonstrate that it complies with Local Plan Policies, including LP 3, LP 6 and LP 9.

The holding of events can provide an opportunity to support the borough’s visitor economy and raise awareness of the Park, its history and its facilities. It is important to ensure that any events taking place are well managed so as to not cause damage to the Ground or cause significant disruption to the wider area.

Indoor Sporting Facilities at Old Deer Park

Indoor sports facilities are provided primarily at the Pools on the Park and at the Richmond Athletic Association Ground. Section 3 sets out the recreational importance of the Pools on the Park complex (together with some of the challenges it faces due to its age and internal layout) and the Health and Squash Club to the indoor sport and recreation offer within the borough. Section 3 also identifies the likely future need for health and fitness facilities, including studio space, in the medium to long term.

Pools on the Park

The Pools on the Park complex is a Grade II Listed Building with landscaped amenity areas adjacent to the outdoor pool, both of which form an integral part of the complex, and therefore are of significance in terms of its role in providing the setting to the Listed Building.

A detailed analysis of the Significance of the Pools on the Park complex, and areas where there

may be capacity to change in the future without causing material harm to that significance has been undertaken to support the development of this SPD.

The main pool hall, spectator seating and café area form the critical areas of significance, together with the outdoor pool and viewing deck. It is also clear from the responses received in respect of the November 2016 consultation that this part of the complex is the most valued by users in respect of its current provision, form and layout.

The analysis of the complex in historic terms has identified a number of areas that have capacity for change as follows:

- The entrance foyer
- The changing rooms
- The studio areas
- The first floor gym facilities

Consequently, there are potential opportunities to undertake improvements within these areas in order to provide a modern, quality swimming and wider leisure offer for local residents, including an identified need for studio space, to provide for a facility which is efficient and viable in the long term, resulting in a significant public benefit. In developing any proposals the principles and objectives identified in the Statement of Significance: ‘Richmond Public Baths, Old Deer Park, Richmond’ document need to be fully considered and proposals justified within this context and having had regard to the other heritage assets pertaining to the Park.

A review of these areas could allow for improved access, including an enhanced reception area to the swimming pool to provide for separate access points for school children and other users, an issue which was identified by a range of stakeholders. This would allow for an increase in capacity and better flow into, and around the building. The viewing platform could

be enhanced and the existing café could be improved and potentially opened to the public.

It could also allow for improvements to access into and around the building for those with mobility impairments, as well as environmental sustainability benefits.

Any works requiring Listed Building Consent would need to be clearly justified. However, the ‘Statement of Significance’ report provides a clear starting point, including in relation to the setting of the Listed Building.

Any development proposals would also be subject to a detailed assessment of their impact on the character and appearance of the Historic Park and Garden and Conservation Area designations.

Richmond Athletic Association Ground

As set out in Section 3, the Health and Squash facilities on the site make an important contribution to the indoor sports provision in the borough. Consequently the loss of the facilities would not be supported unless it is demonstrated that they are no longer needed or have been replaced elsewhere. The latter would be beneficial in terms of achieving improvements to the character and appearance of this part of the Park.



Access point into Old Deer Park



Footbridge over A316



A316 Underpass

Car Park site and Community Uses within Old Deer Park

This area of the park lies within the Old Deer Park Conservation Area, the Historic Park and Garden, has potential archaeological interest and a large part of the site is designated as Metropolitan Open Land. It contains a public car park, a landscaped area which is designated as Public Open Space, Royal Mail sorting office and a number of community/ voluntary sector buildings. It lies adjacent to Richmond Adult Community College, which offers a wide range of educational facilities.

The A316 Twickenham Road isolates this part of the Park from the remainder. The site is located within a short walk of both Richmond Railway station and bus services serving both the borough and the wider area.

The Old Deer Park Conservation Area Study states that the car parks (including this area) detract from the character of the parkland. The Conservation Area Study further identifies there are problems relating to boundary maintenance and inadequate means of rubbish disposal.

The continued operation of the community uses is important. However, the existing buildings are beginning to deteriorate, are expensive to run in their current form, are not environmentally friendly and the layout of some are not efficient and effective in relation to how they are now used. Several buildings are currently vacant. The buildings are, for the main part, used primarily at evenings and weekends and the car park does not allow the key user group, i.e. young people, to access high quality outdoor space.

The buildings are sub-leased to a number of voluntary organisations, and have a negative impact on the historic context within which they are

located, by virtue of their temporary, pre-fabricated appearance and the untidy arrangement of individual plots. Moreover, a number of the buildings are located within Metropolitan Open Land and detract from its openness and character and the current configuration of the buildings prevent positive visual and physical connectivity between the two sides of the Park.

A more efficient use of this area could be achieved through the rationalisation of the existing buildings to provide upgraded facilities, together with improvements to the visual appearance of the car park through reconfiguration. Wider impacts and potential benefits on views and the sense of openness, which are key characteristics of the registered landscape, would need to be considered early in any design process.

Redevelopment of the area would allow for links between central Richmond, Richmond Green, the River and the Park to be improved for the benefit of pedestrians and potentially cyclists.

Opportunities exist to co-locate the community uses to make more efficient use of, and potentially improve, the facilities available.

Any co-location would need to take into account the practical and operational needs of the various uses, together with the historic and planning policy considerations. Individual users needs include for example, appropriate levels of on-site security provision for the uniformed groups, and St Johns need secure parking provision on site for their ambulance. All have storage needs. Any proposals would need to have regard to the low key nature of the current built form in respect of the height, scale and massing of the individual buildings.

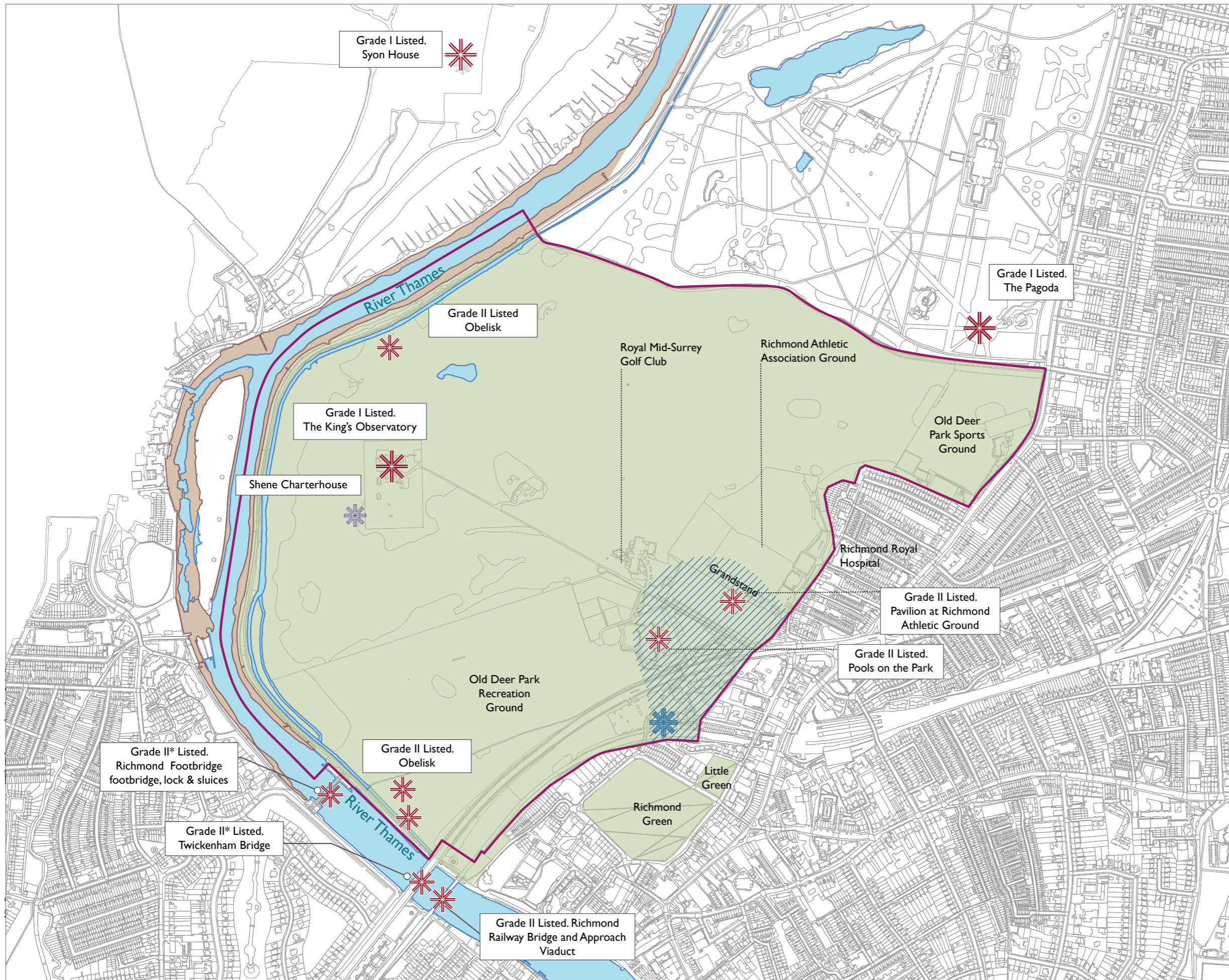
This could lead to a scenario in which two new buildings were provided, one for example, to house the Air and Sea Cadets, and another to accommodate St Johns Ambulance and the North Richmond Scouts. In addition opportunities could be created to support other community activities during the day including, for example, the day nursery that is co-located with the Old Deer Park Recreation Ground changing facilities.

This would indicate the potential need for more than one building in any redevelopment proposals to be able to achieve operational and planning policy objectives and take a sensitive approach to the area's historic designations. There is no known operational requirement for all of the community groups to be located in close proximity to each other. There is therefore flexibility as to where within the Park these could be provided. Potential locations include on the site currently occupied by the Air Cadets and Sea Cadets, on land at the northern end of the Old Deer Park Car Park adjacent to its boundary with the Richmond Adult Community College or within the area that currently accommodates the maintenance compound for the Old Deer Park Recreation Ground (see Page 28). The overriding principle would be that there is no material increase in the quantum of development on those sites that lie within Metropolitan Open Land. Taking this into account, and recognising the wider needs of the area for community related uses, there could be potential to support further uses within the overall level of existing built form but which is provided in such a way as to provide benefits to improving the historic environment and openness of the area. The overall height, scale, massing, materials and finishes of any new development should reflect the current low-key nature of the individual buildings such that any impact of redevelopment on sites across the Park is effectively neutral when considering the existing built form.

The Royal Mail operates from buildings adjacent to the gateway into the Park from Park Lane. The buildings comprise the Former East Surrey Regiment TA Drill Hall of 1912 and its annexe of 1932, and fall within the SPD area. It is understood that the site continues to be needed to support the operational requirements of the business and therefore has not been identified as part of any wider proposals.

Notwithstanding this, should circumstances change, any future proposals would need to be considered within the context of the policies contained in the Local Plan 2017 and reflect its location within both the Conservation Area and the Grade I Historic Park and Garden.

It is recognised that the exact nature, amount and mix of land uses will be dependent upon on the outcome of further feasibility studies including a robust assessment of need. The proposed uses will need to be commercially feasible and viable in order to create a deliverable scheme. However, the groups that currently operate within this part of the Park have indicated that in principle shared facilities could be possible subject to the operational needs of the individual groups being met.



KEY

- Conservation Area and SPD Boundary
- ✱ Listed Buildings/Structures
- ✱ Scheduled Monument
- ✱ Potential Archaeological Interest
- /// Area of focus for potential changes

Figure 6: Area of focus for potential change

6. Implementation and Delivery

A number of the enhancement opportunities set out in the SPD will require significant amounts of funding. The benefits of having an adopted Supplementary Planning Document is that it can provide some level of comfort to proposed funders as to the likelihood of securing planning permission.

There are a number of potential ways to secure delivery. These include:

- For lessees to undertake a review of their site signage (with a particular focus on the Richmond Athletic Association and Old Deer Park Sports Grounds and within the Old Deer Park car park) to enhance the visual appearance of the Conservation Area.
- For the Council (as lessee) to work with partners including the Old Deer Park Working Group to provide improvements to wayfinding and interpretation boards.
- For the Council (as lessee) to work with partners including the Thames Landscape Strategy team to identify and implement opportunities to enhance the biodiversity offering within appropriate parts of the Park.
- For the Council to work with partners including Natural England to report the maintenance of key meridian line views and develop a strategy for undertaking a regular programme of maintenance to keep the views open (including those identified in the Planning Obligation relating to planning permission Ref. No. 11/2592/FUL for works to The King's Observatory).
- For the Council to encourage Transport for London to review and if appropriate, implementation of a reduction in speed limit on the A316 through the Park.
- For the Council (as lessee) to work with Transport for London to secure the re-opening of the A316 pedestrian underpass and to deliver electric vehicle charging points, in particular rapid chargers, in visible and easily accessible locations within the Park.
- For the Council (as lessee) to review opportunities for and, if appropriate, implement improvements to or provide new pathways within the Park.
- For the Council (as lessee) to review, and where appropriate, implement the enhancement of gateways into and within the Park, with a particular focus on the Park Lane entrance.
- For the Royal Mid-Surrey Golf Club, Richmond Athletic Association and Council (as lessees) to work together with Transport for London to review and, where appropriate, secure improvements to access and egress from/to the A316.
- For London Scottish, Richmond and London Welsh Rugby Club to work with the Council to maximise the current capacity of the rugby pitches within the Old Deer Park Recreation Ground to provide a co-ordinated approach to help address current issues of overplay on existing pitches. This could, for example, include reviewing the current configuration of the pitches. It will be important to ensure that a co-ordinated approach is taken to avoid over-use on the Recreation Ground pitches which affect their quality and to avoid impacting on other activities such as 'Parkrun'.
- For larger schemes there are a number of potential avenues for implementing changes, through grant funding from the overseeing bodies of the organisations located within the Park, from national sporting bodies, from national sources of funding such as through the national lottery or through community based approaches. Recognising that such funding may need longer lease terms than are currently provided on some parts of the Park, the Crown Estate, as landowner, should be encouraged to give consideration to the length of leases provided or provide mechanisms by which to give grant funders certainty of continuation of uses and activities to which the funding relates.
- For the Council to work with the Crown Estate to clarify roles and responsibilities with respect to boundaries and their maintenance, and for opportunities for investment to support the conservation and sustainability of the Park from a heritage, biodiversity, community, sport and recreation perspective.
- Any organisations seeking to secure either planning permission or Listed Building Consent should engage with the Council at an early stage. More information regarding the Council's pre-application advice service can be viewed at www.richmond.gov.uk/services/planning/pre-applications. Historic England also provides a pre-application advisory service. More information on this service can be viewed at www.historicengland.org.uk/services-skills/our-planning-services/charter/our-pre-application-advisory-service. In addition, any proposals for planning permission falling within the Royal Botanic Gardens, Kew buffer zone would need to submit an Heritage Impact Assessment in line with the International Council on Monuments and Sites UK (ICOMOS) methodology.

