



David Wilson
E: david.wilson@thamewater.co.uk
M: +44 (0) 7747 647031

Charlotte Glancy
Programme Officer
Richmond Local Plan Examination

1st Floor West
Clearwater Court
Vastern Road
Reading
RG1 8DB

Issued via email:
bankssolutionsuk@gmail.com

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Examination of Richmond Local Plan – Matter 17- Increasing biodiversity and the quality of our green and blue spaces, and greening the borough (Policy 34 – 43)

Dear Sir/Madam,

Please find below our Hearing Statement in relation to Matter 17 in relation to Policy 35 Green Belt

Thames Water consider it is necessary to identify additional land to accommodate development due to likelihood of further land being required in excess of the previously assessed need and to provide additional flexibility and buffer of land to account for floor space not being delivered and maintained as the draft Plan anticipates. Given the limited available land in the urban area and potential for intensification of existing sites, it is necessary for additional release of Green Belt land.

NPPF Paragraph 142 requires sustainable patterns of development to be taken into account when reviewing Green Belt boundaries, 'channelling development towards urban areas inside the Green Belt boundary' and that, 'where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well-served by public transport.'

This means that once all sources of brownfield land and density maximisation have been assessed and adjoining Boroughs have been consulted (we do not expect any adjoining Boroughs to have significant surplus capacity), a case should be put forward for exceptional circumstances in order to justify the release of Green Belt to meet employment and economic growth needs.

This case should relate to the evidence-based demand requirements, in the context of the Borough and London-wide economic and housing needs. It should also consider the need for sustainable patterns of growth as per NPPF paragraph 142, which should ensure that new economic development is delivered sustainably and within more urbanised areas in the Green Belt.

In considering site-specific exceptional circumstances, we have set out below the cases for release from the Green Belt of three Thames Water sites as listed below:

1. Land to West of Stain Hill West Reservoir, Hampton Water Treatment Works, Upper Sunbury Road for residential development;
2. Hydes Field, Land to North of Hampton Water Treatment Works, Upper Sunbury Road for water infrastructure development; and
3. Hampton Water Treatment Works, Upper Sunbury Road for water infrastructure development.

Details of each of these Sites demonstrating exceptional circumstances to justify their release from the Green Belt are provided below.

1. Land to West of Stain Hill West Reservoir, Hampton Water Treatment Works, Upper Sunbury Road

Site area: approximately 3.58 hectares - refer to plans below:



Current use: vacant land/retained operational land.
 Proposed use: residential or mixed use development.
 Likely availability: 1-5 years.

The site is currently within the Green Belt, but is very well contained and sandwiched between the Stain Hill West Reservoir to the east and residential development along Kenton Avenue with Upper Sunbury Road forming the northern boundary and Lower Hampton Road forming the southern boundary.

The Arup Open Land Review assessed the site as part of GA5. We disagree with the review and consider the site does not perform strongly in Green Belt terms. The Green Belt review is unclear as to which settlement sprawl is being referred to as the River Thames separates Molesey and Hampton and this part of Green Belt is not strategic in the whole parcel (i.e. the assessment of the parcel in its entirety leads to a flawed judgement and assessment of the Green Belt). There is a broken Green Belt connection around the land to west of Stain Hill West Reservoir.

Given the location of the site, it is considered that it weakly performs in accordance with the 5 purposes for Green Belt as set out in paragraph 134 of the NPPF:

- a) the site is located on the edge of the urban area and is surrounded by existing development to the west and south and the raised Stain Hill Reservoir to the east and Upper Sunbury Road to the north. The site is well contained with defensible boundaries and development will not impact urban sprawl;
- b) the redevelopment of the site will not reduce the gap between existing settlements and will not lead to neighbouring towns merging into one another;
- c) the development of this site will assist in safeguarding the open countryside from encroachment;
- d) the development of the site will not have any detrimental impact on the setting and special character of a historic town; and
- e) an appropriately designed development could enhance the character of the site.

The site is currently retained operational land but included in a review that Thames Water is carrying out of its landholdings to establish both strategic needs for future infrastructure (Hydes Field), and also whether a site can be released for redevelopment (land to West of Stain Hill West Reservoir).

2. Hydes Field, Land to North of Hampton Water Treatment Works, Upper Sunbury Road

Site area: approximately 21.18 hectares - refer to plans below:



Current use: retained operational land and 3rd party leases

Proposed use: the site was previously put forward for water infrastructure and mixed use development. The site is being assessed for new Water Supply development as part of Thames Water's new Water Resource Management Plan. The site has potential to be used as a new effluent treatment plant for water supply.

This site is currently within the Green Belt, but is also well contained and sandwiched between development along Oldfield Road and Portlane Brook (with Kempton Racecourse beyond) with Upper Sunbury Road forming the southern boundary and the railway line to the north. We disagree with the Green Belt review and consider the site does not perform strongly in Green Belt terms. The Green Belt review is unclear as to which settlement sprawl is being

referred to as the River Thames separates Molesey and Hampton and this part of Green Belt is not strategic in the whole parcel. It is therefore considered that the site should be removed from the Green Belt.

London's water needs are the key driver for the strategic resource options programme which supports the development and delivery of strategic schemes that will provide long term resilience to clean water provision for the region. This site represents a large landholding strategically located near key existing sewage treatment sites (Mogden STW in LB Hounslow and Hogsmill STW in RB Kingston upon Thames), water treatment sites (Hampton WTW; Kempton WTW; Walton WTW) and a number of reservoirs in south west London and therefore is critical to supporting this strategic development. As such, it is considered that exceptional circumstances exist to release this site from the Green Belt in order to ensure the delivery of critical infrastructure is made more straightforward within the planning system.

The site is currently retained operational land but are included in a review that Thames Water is carrying out of its landholdings to establish strategic needs for future infrastructure. Consistent with that review process and to ensure appropriate development plan support is available for these potential essential infrastructure developments, it is also considered that the Hydes Field site should be allocated in the new Local Plan as a future infrastructure development site, with its use defined as for water and / or wastewater infrastructure provisions.

There is also an opportunity for the site to contribute towards landscape and biodiversity enhancement, which would be supported by allowing some essential infrastructure development. Any future use of these sites would be expected to integrate the provisions of emerging policy in respect of biodiversity net gain, and local requirements relating biodiversity and landscaping, to ensure their strategic future development is appropriately integrated within their receiving environments.

3. Hampton Water Treatment Works, Upper Sunbury Road

Hampton WTW is located in the Green Belt and given that it is one of the largest operational WTW and there will be a requirement for upgrades to support growth it is considered that the opportunity should be taken to remove the site from the Green Belt as part of the Green Belt Review to help facilitate development which will be necessary to support growth within the Borough and surrounding area.

Hampton WTW was previously identified as an existing Major Developed site in the Green Belt in a previous adopted Richmond Local Plan in accordance with the former Planning policy Guidance Note 2 (PPG2) on Green Belts. However, PPG2 was removed with the publication of the NPPF which does not include provision for the designation of Major Developed Sites in the Green Belt. The Council did not therefore agree to designate Hampton WTW as an existing Major Developed Site in the current Local Plan in line with the NPPF.

The operational Hampton WTW occupies 74.3 hectares (183.6 acres), is Thames Water's second largest works and is of strategic importance for London's water supply. It will be inevitable that further upgrades will be required over the plan period to increase capacity to meet growth being proposed in the London Plan and Local Plans or meet new treatment standards.

Given that the WTW is essential infrastructure it is considered that there are exceptional circumstances to remove the Hampton WTW from Green Belt designation in accordance with Policy G2 of the London Plan 2021. Essential upgrades to the WTW may be necessary to support growth and deliver environmental improvements. In this context development of the site will be essential to support growth and deliver sustainable development in line with the development plan strategy. The site is not currently open and incorporates significant areas of concrete/brick/metal tanks, plant,

machinery and buildings and as such it would not be necessary for the site to remain open. There are a number of water bodies on the site, but these are man made filter beds and reservoirs which could not be maintained as such in perpetuity if they were to become redundant. As such, the designation of the WTW site as Green Belt goes against the requirements for designation of Green Belt land set out in Paragraph 139 of the NPPF.

The aerial photo below illustrates the built up nature of Hampton WTW:



Paragraph 134 of the NPPF states that Green Belt serves five purposes: to check the unrestricted sprawl of large built up areas; prevent neighbouring towns from merging; assist with safeguarding the countryside from encroachment preserve the setting and special character of historic towns and assist in urban regeneration. Given that the WTW site is existing developed site with built development and infrastructure on which further development will be required in the future in order to facilitate sustainable development within the borough and surrounding area, the site is not considered to align with the purposes of the Green Belt set out in Paragraph 134. It is therefore considered that the opportunity should be taken to remove the Hampton WTW from the Green Belt.

We disagree with the findings of the Green Belt, MOL, LGS and OOLTI Review undertaken as evidence base for the Local Plan and consider the site does not perform strongly in Green Belt terms. The Green Belt review is unclear as to which settlement sprawl is being referred to as the River Thames separates Molesey and Hampton and this part of Green Belt is not strategic in the whole parcel. The assessment of the entire parcel is flawed as it includes a number of different characters which perform differently against the Green Belt functions. To assume all of the land, including buildings and physical infrastructure is 'high performing' Green Belt is clearly flawed. It is therefore considered that the site should be removed from the Green Belt.

Yours faithfully,

David Wilson
Thames Water Property Town Planner