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Sent: 26 July 2023 16:23
To: Richmond Local Plan
Subject: Submission to draft Local Plan consultation from Chair, Udney Park Playing Fields Trust

Categories: Consultation Response

The Udney Park Playing Fields Trust welcomes the continued planning protections in the draft Local Plan for Udney Park as a Local Green Space, Other Open Land of Townscape Importance and Asset of Community Value whose ability to serve the community arises from its function as: a playing field for amateur sports clubs, a War Memorial and Building of Townscape Merit and as an important site in the local ecology network.

Local Green Space (LGS)

The Trust welcomes the introduction of a Local Green Space policy to the Local Plan in 21.18, and that Udney Park maintains the status of Local Green Space awarded since the last Local Plan after a site-specific consultation.

Other Open Land of Townscape Importance (OOLTI)

The Trust welcomes the retention of OOLTI status for Udney Park and asks that Council commits in the Local Plan to enforce maintenance requirements on owners where a lack of maintenance decreases community amenity from the Open Land of Townscape Importance. Policy 55 on Enforcement and Maintenance is limited to "unauthorised development", this Policy should be extended to include a commitment by LBRUT to Enforcement of material breaches of planning protections and historic s106 commitments, failure to conserve heritage assets and failure to take reasonable attempts to prevent anti-social behaviour.

Asset of Community Value (ACV)

The Trust welcomes the renewal of the ACV status of Udney Park after the change of ownership in 2022. It is proposed to delete the word "likely" in paragraph 24.19 of the draft Local Plan, ACV is by law a material consideration in Planning for change of use .

Playing Pitch Strategy

Regarding the January 2022 "PLAYING PITCH STRATEGY Action Plan Update" it is welcomed that Udney Park retains status as a "Key Site". However, under community ownership and with NGB and Sport England support, Udney Park has the potential to be a "Hub Site" serving the South end of the Borough as Barn Elms is a "Hub Site" for the North end of the Borough. The draft Local Plan should be revised to recognise this potential for Udney Park to provide increased community amenity as a "Hub Site" under an ACV-compliant ownership structure.

We note that an update to the "2018 PLAYING PITCH STRATEGY" has not yet been made public and there were some concerns about this 2018 document which were leveraged by the first speculative owner of Udney Park at the 2020 Public Inquiry. The Trust seeks the opportunity to consult on a draft version of the new PLAYING PITCH STRATEGY, itself an important document in the next Local Plan Independent Examination.

Pavilion Heritage

The Trust welcomes the recognition of the Udney Park Pavilion as a registered War Memorial and Building of Townscape Merit since the last Local Plan. The War Memorial Pavilion passed the centenary of its opening in November 2022. The current owners have allowed a physical deterioration in the condition of the Pavilion due to anti-social behaviour and the Trust urges the Council to use statutory powers of Enforcement to protect locally-listed Heritage buildings.

Udney Park Draft Conservation Area Appraisal

In response to a public consultation on Conservation Areas for Teddington and Hampton Wick in summer 2022, the Trust prepared a Draft Conservation Area Appraisal for all of Udney Park, working with a leading Heritage architect

and the London Gardens Trust. In January 2023 LBRUT declined to review this draft Appraisal due to resource priorities. In light of the continuing deterioration of amenities at Udney Park, the Trust urges the Council to review the draft Conservation Area Appraisal before the Local Plan Inspection.

Policy 34 Green and Blue Infrastructure

At the 2020 Public Inquiry the Council Biodiversity Officer recognised the importance of Udney Park to the local ecology network. The Trust is supportive of the Council maintaining the importance of Udney Park in Nature Conservation and the potential of Udney Park to increase its role in the provision of green space for public amenity.

Mark Jopling, Chair, Udney Park Playing Fields Trust