

OLD DEER PARK

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I. Introduction

This draft 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 and enhancement 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 attributes of the Park 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 English Heritage'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. However, given the great significance of the park, with a high level of sports provision, 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 draft SPD follows consultation with key 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.



Recreation Ground



Wayfinding - Old Deer Park car park



Old Deer Park signage



Kew 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, sports



Figure 1: Aerial Photograph of draft SPD area

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

- 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 Recreation Ground, as well as a nursery school and access road;
- Kew Observatory (more commonly known as 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, which is home to Richmond and London Scottish Rugby 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, rugby pitches 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 Football 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.

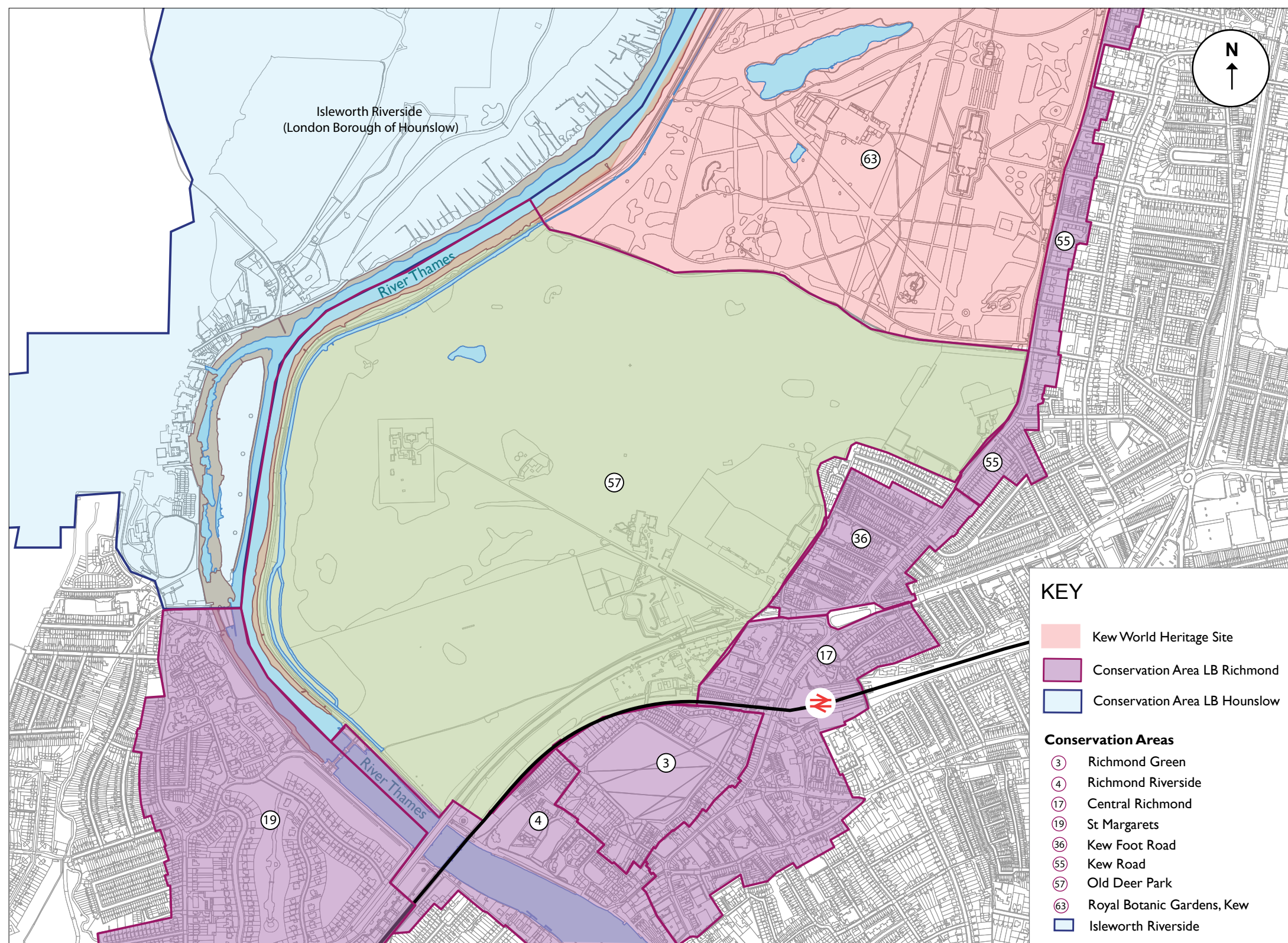


Figure 2: Neighbouring Conservation Areas

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 Sheen, 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 Kings 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 Royal 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. 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 (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 Athletics Association to lease the first 9 acres of the current Athletics 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 Royal 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 Athletics Association Ground.

The Old Deer Park also became an open space for special events and war-time emergencies. The events began with the annual Royal Horse Show on the Athletics Ground in 1892 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 Rugby Football Club moved to the Athletics Ground in 1892 and London Welsh Rugby Football 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 Athletics 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, include:

- Royal Botanic Gardens, Kew Historic Park and Garden (Grade I)

Listed Buildings:

- Kew Observatory (Grade I)
- Richmond Athletic Association Pavilion (Grade II)
- Richmond Swimming Baths now Pools on the Park (Grade II)
- Obelisks. (Grade II)

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

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

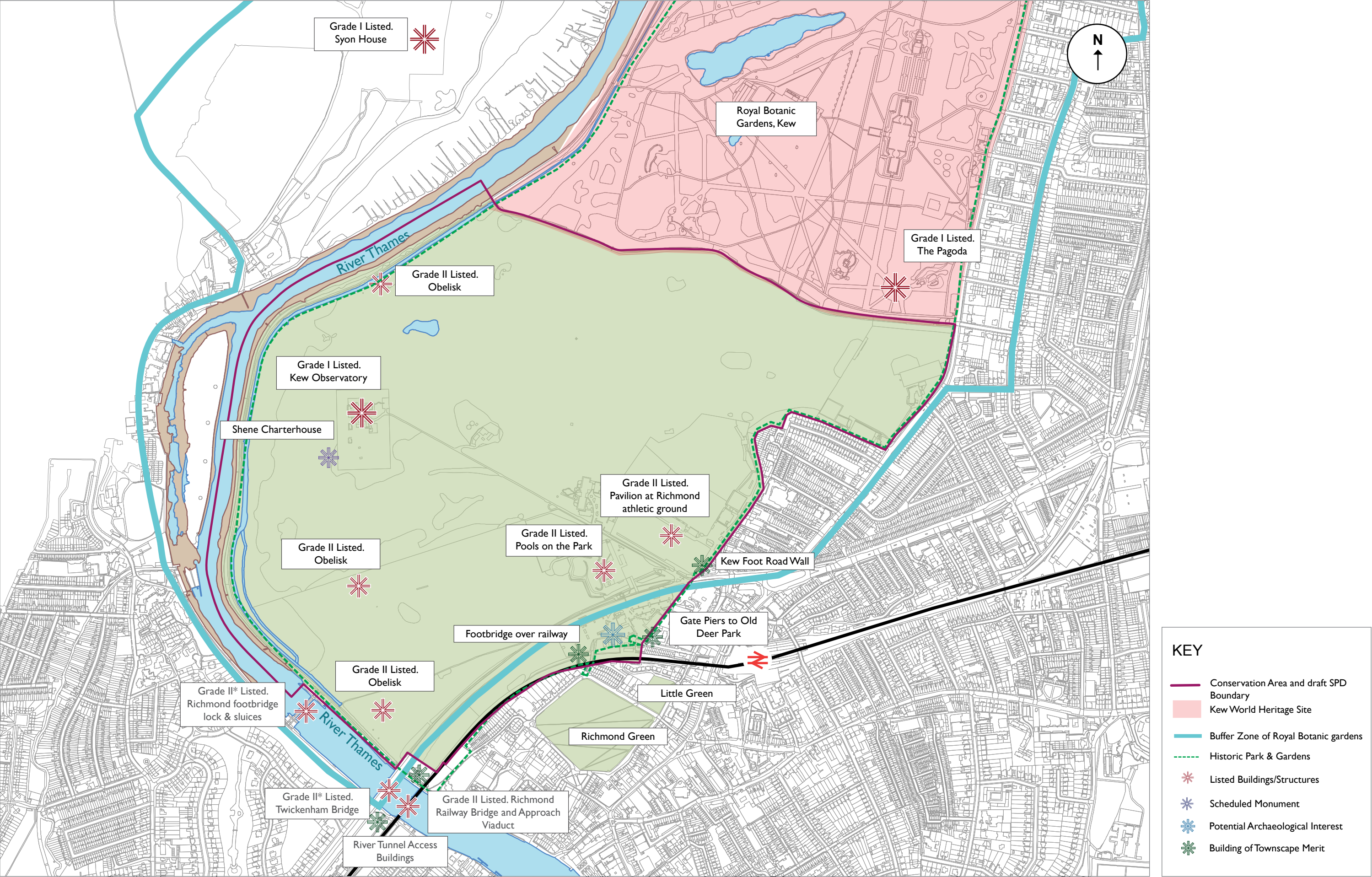


Figure 3: Heritage Assets

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 Kew Observatory and associated historic meridian links as well as the visual connections across the wider historic landscape.

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.

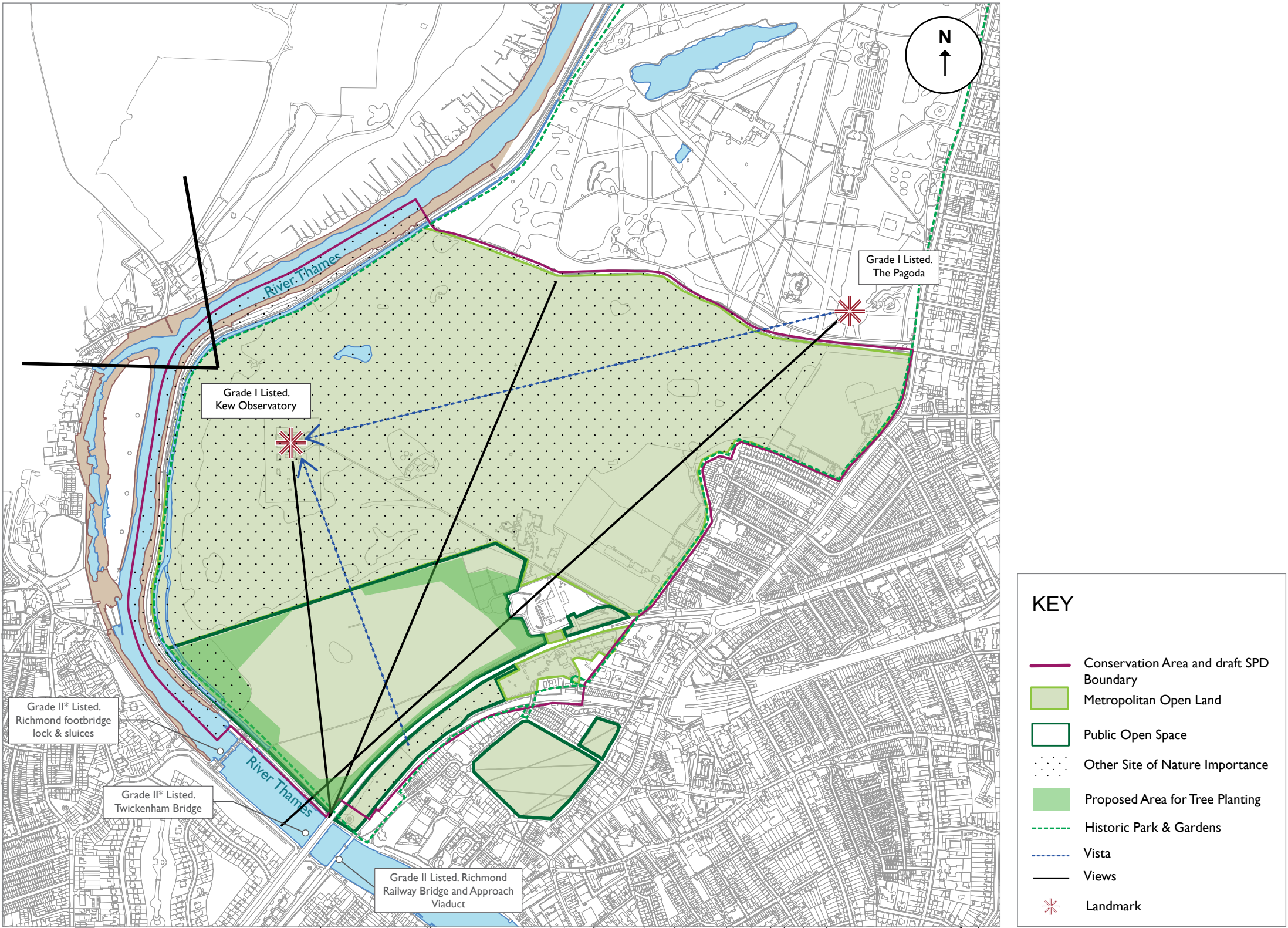


Figure 4: Landscape, Views and Open Space

Transport and Accessibility

Vehicular access to a significant proportion of the Park is from the A316 Twickenham Road. The Old Deer Park Sports Ground and a service entrance to the golf course are accessed off the Kew Road and vehicle/pedestrian access into the Old Deer 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, 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 and numerous bus services 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 distances connections to areas north and south of the Park.

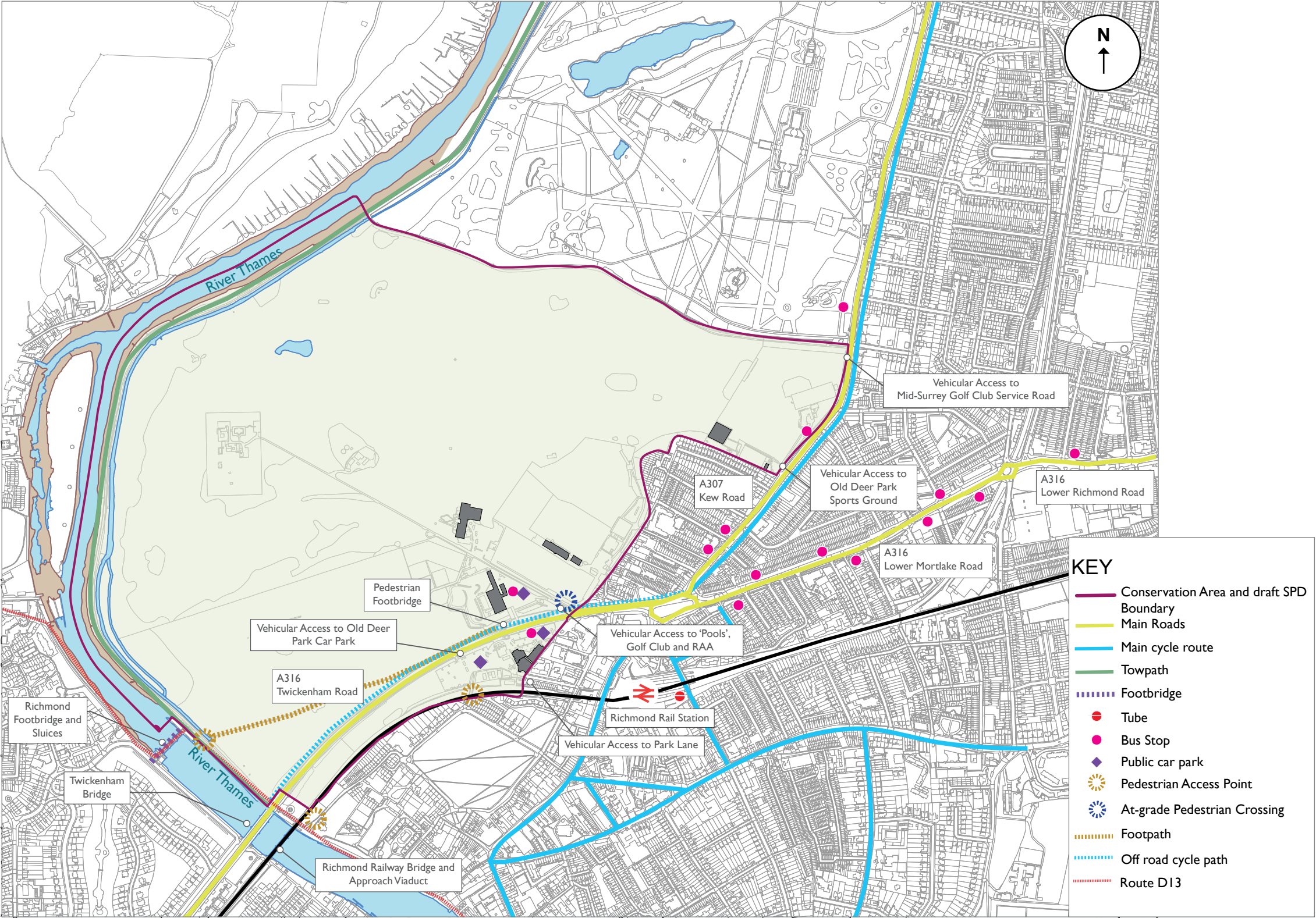


Figure 5: Transport and Accessibility

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 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.

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. The Publication Local Plan takes into account responses made during public consultation in summer 2016. 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 in brief below including reference to the equivalent existing policies within the Core Strategy (2009) and Development Management Plan.

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 conserve and enhance its designated heritage assets 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 significant 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 the quality of views, vistas, gaps and the skyline that contribute significantly to the character and quality of the local and wider area.

Within the existing Development Management Plan the equivalent policy is DM TC 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 LP12 ‘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 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 LP18 ‘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 contributing 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 that the adequate provision of community service 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 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.

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.

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.

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 policy 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 including landscape management and guidance proposals 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_supplemenaty_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
- Trees: Landscape Design, Planting & Care - http://www.richmond.gov.uk/media/7653/spgtree_ldpca.pdf
- Trees: Legislation and Procedure (1999) - http://www.richmond.gov.uk/media/7654/spgtree_legislationa.pdf
- Delivering SuDS in Richmond (2015) - https://www.richmond.gov.uk/media/3321/sustainable_drainage_systems.pdf
- 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)
- Old Deer Park, Richmond. The Crown Estate Landscape Strategy 1999 (Landowner document)

Other information sources

- Statement of Significance Richmond Public Baths, Old Deer Park, Richmond JS Conservation Management and Town Planning Limited September 2017 (Council document)
- Playing Pitch Assessment 2015 Knight Kavanagh & Page (Council Document)



Obelisk



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.

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 Recreation Ground. An analysis of each sporting activity is summarised below.

Rugby

The current provision for rugby pitches is as follows:

[Richmond Athletic Association Ground \(Richmond RFC and London Scottish RFC\):](#)

Six playing pitches and one training pitch all of which are grass. Several are floodlit. As of 2015 the number of teams playing at the ground were:

[Richmond Rugby Football Club:](#)

- 9 senior
- 10 junior
- 7 mini

These comprise mens, ladies, boys and girls teams.

[London Scottish Rugby Football Club](#)

- 5 senior
- 5 junior
- 10 mini

These comprise mens, boys and girls teams.

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 RFC 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 RFC and London Scottish RFC both highlight that there is a lack of availability for changing facilities at the site. Furthermore, the buildings on site were viewed as being old and expensive to operate and maintain.

[Old Deer Park Sports Ground \(London Welsh Amateur RFC\)](#)

One match pitch and one training pitch (which is floodlit), both of which are grass. As of 2015 there were 5 senior, 4 junior and 7 mini teams comprising men's, ladies, 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.

[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 Recreation Ground.

Casual public use (the area is identified as public open space) was also cited as an issue.



Richmond Athletic Association Ground



Recreation Ground



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. 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.

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.

Recreation Ground

There are six grass courts and five hard courts located within the 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 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).

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.

Indoor Sports facilities

Swimming

The Park is home to the ‘Pools on the Park’. It has an 33.3m length indoor pool with six lanes , an outdoor 33.3m length pool, also of six lanes and an 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. The situation is exacerbated during the winter months when the lido element of the Pools is closed and swimmers are less inclined to swim at Hampton Pool. 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 in 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 as a membership facility. It provides a wide range of equipment ranging from over 30 ‘traditional’ stations through to a punchbag/ abdominals area. t also has a large studio which is available for hire. (For squash facilities see below).

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 and membership is required for their use.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.

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. 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.

Recreation Ground

A nursery school is located on the edge of the 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 and is a membership only club. The monastery built by Henry V was located where the 14th and 15th holes are now played.

The introduction of golf on the site has resulted in the loss of 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. In addition, low-level scrub planting along its boundary with the Recreation Ground and towpath in particular 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 Kew Observatory at limited points and the integrity of the views along the meridian lines, denoted by the Obelisks located at various points, have been compromised.

The service road and access located along the boundary between the Golf Course and the Royal Botanic Gardens, Kew is not open for wider public access, and therefore precludes the ability to access the River Thames towpath at this point. Opportunities to facilitate access in the vicinity are set out as an objective in the Royal Botanic Gardens, Kew Landscape Management Plan.

Recreation Ground

The Recreation Ground is designated as public open space. 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. 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 impacts the attractiveness of the area and potentially on people's desire to make use of what is an important public facility.

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 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.

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 'offer' of the Park. Consequently it is an important feature but is little used. 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.



Access point into Old Deer Park from A316



Footbridge over A316



A316 underpass

5.The Future Role of the Old Deer Park

There are opportunities to both conserve and enhance the Park to reflect its history, as well as support its wildlife and nature conservation role, improve the sports, recreation and community offer and enhance 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;
- 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. 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:

- 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



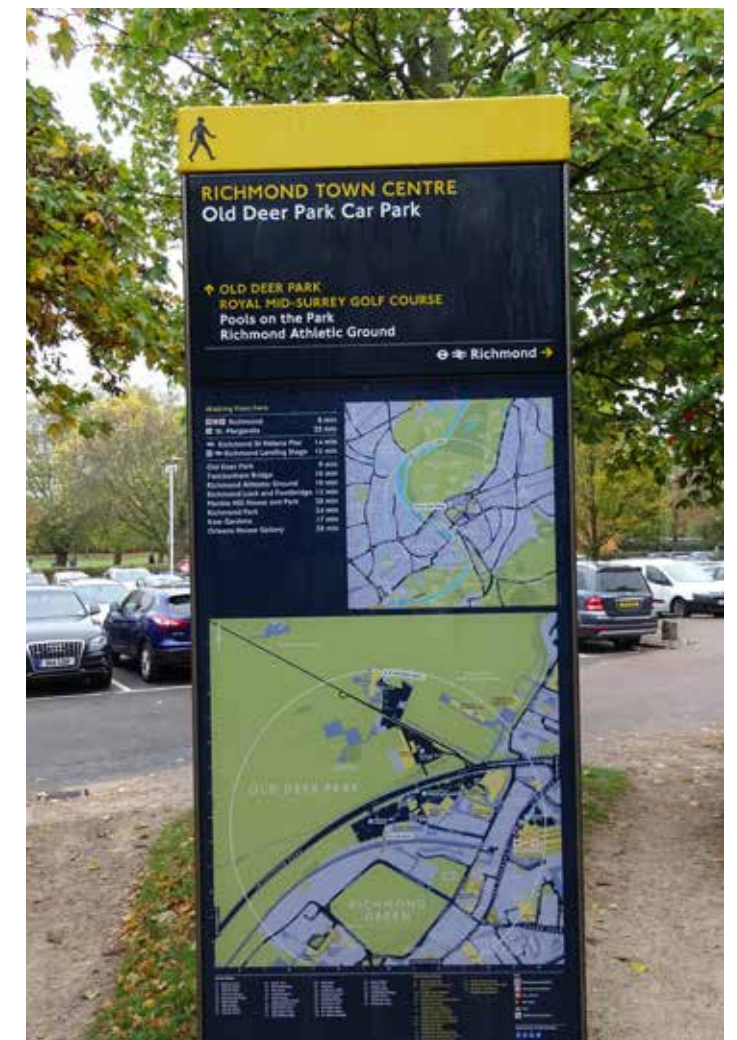
Old Deer Park Sports Ground entrance



Kew Foot Road boundary wall



Meridian Line marker



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 a pillared and gated entrance leading to a pedestrian/cycle 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. However, these are ‘lost’ as a result of the placement of physical access management devices such as headroom restriction and access barriers, and signage. 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 Kew 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, particularly as a result of the encroachment of scrub vegetation within the Royal Mid-Surrey Golf Club and tree overhang on the boundary with the Recreation Ground. There are real opportunities to improve/open up these views and vistas by appropriate removal or pruning of trees and vegetation predominantly within the boundary of the Royal Mid-Surrey Golf Club. This is as a result of ‘grow back’ 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 Kew 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

Emphasis should be placed on reducing the visual impact of the large surfaced areas devoted to car-parking and associated visual clutter. The Old Deer

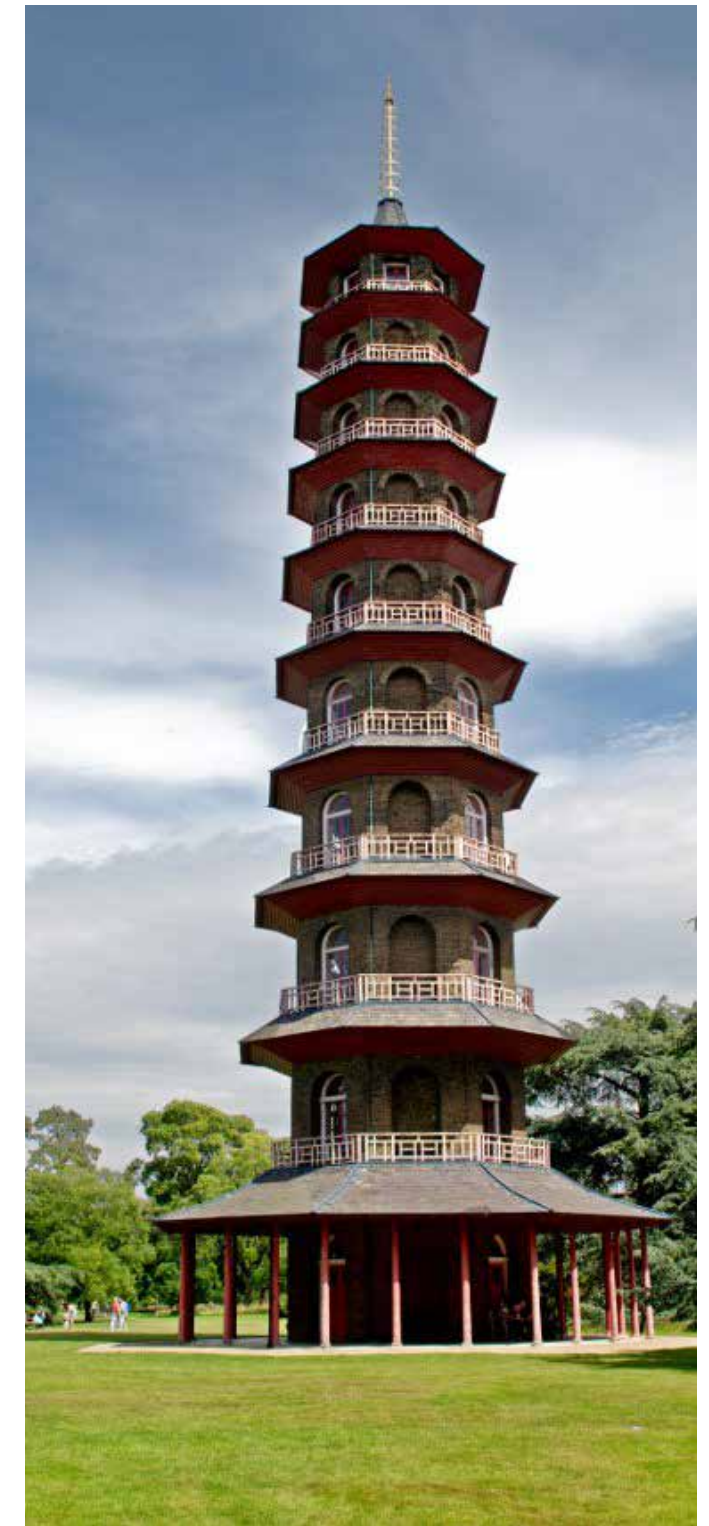
Park car park is an important facility for visitors to both Central Richmond and to the Old Deer Park. However, there is only limited landscaping within it and the area is interspersed by a number of unattractive ancillary buildings, structures, fences and signage.

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. This biodiversity should be protected and enhanced, for example, through habitat creation. Areas to the south of the Park, within the 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 (a large proportion of which lies within the SPD area) make an important contribution to both the biodiversity of; and landscape setting to, the care of the Park. Detailed information and improvement opportunities are set out in the Thames Landscape Strategy (TLS) Reach 10 ‘Isleworth’. The TLS can be viewed at www.thames-landscape-strategy.org.uk

Enhancements to the historic landscape, especially its contribution to the setting and buffer zone of the Royal Botanical 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 reflect those planted as part of the 18th century parkland design. This is particularly pertinent to the Royal Mid-Surrey Golf Club part of the site. Tree planting as part of the golf course design does not necessarily reflect this. This is an



The Pagoda

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, Recreation Ground and Golf Course

- the brick gateway piers at the access into the Old Deer Park Sports Ground.

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.

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 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.



Obelisk with Royal Mid-Surrey Golf Course boundary behind



Gated entrance to the Old Deer Park from Richmond Green



Wildlife within the Old Deer Park

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 benefit of including the perception of safety for users of the Recreation Ground, to local Air Quality and safer vehicular access and egress into the Old Deer Park car park.

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 has been closed off. It's re-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 a unattractive and sometimes impassable route. This 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. The Royal Botanic Gardens, Kew identified opportunities to provide pedestrian/cycle access to the River along its southern boundary with the Royal Mid-Surrey Golf Club in the Management

Plan that it developed to support its World Heritage Site status. This opportunity should be actively explored and supported, in particular through making use of the existing service access road to the Royal Mid-Surrey Golf Course.

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 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.

Car 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.



Views to Old Deer Park car park



Royal Mid-Surrey Golf Course service road access

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 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 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 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 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 supply of pitches available at peak times to those clubs, as well as to local schools within the area.

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.

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 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 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



Old Deer Park Sports Ground



Recreation Ground Cricket Wicket



Pools on the Park

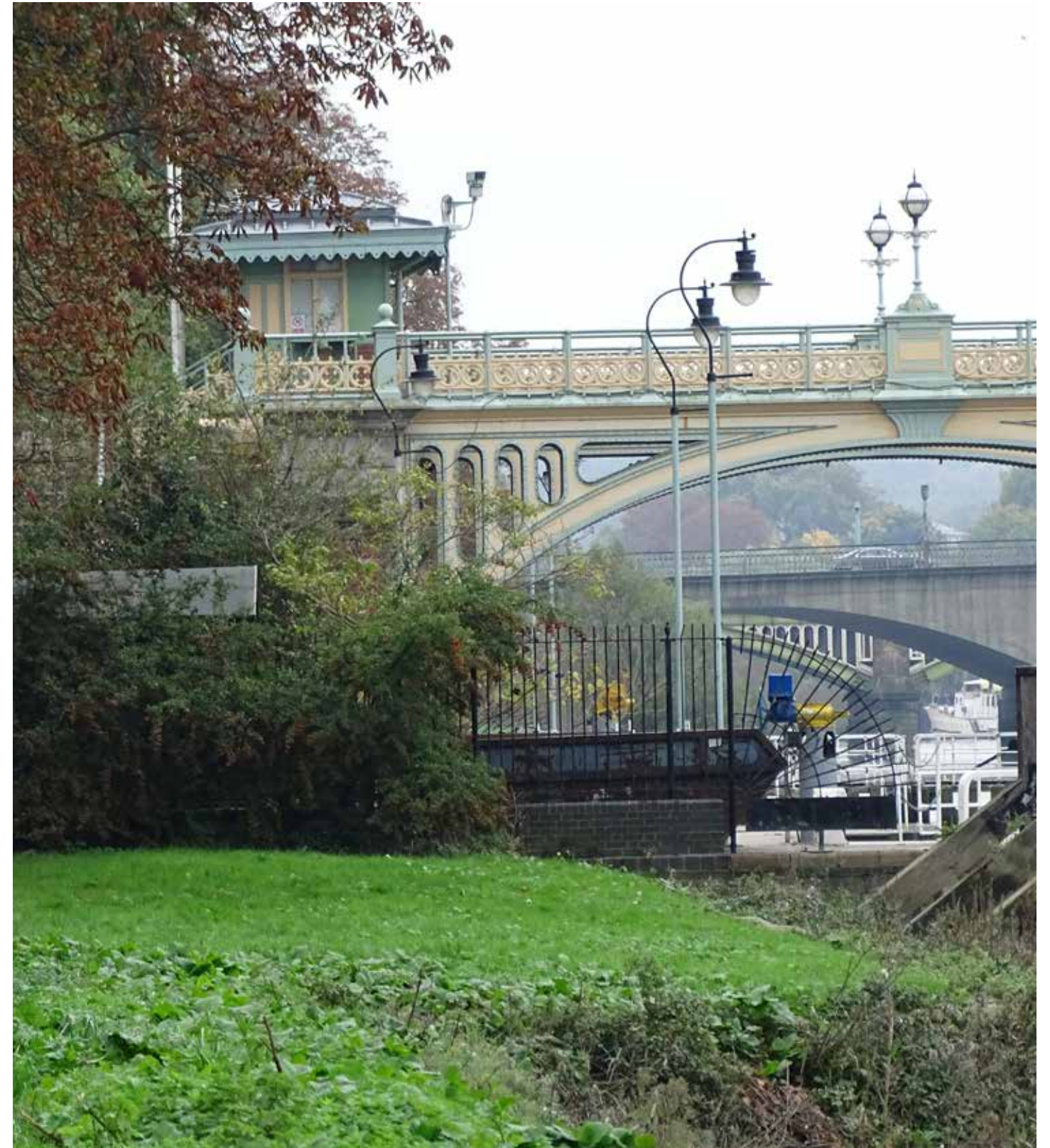
from this point as a result of the tree screening within the Royal Mid-Surrey Golf Club.

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 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.

Floodlighting can help to address capacity issues. 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 a site-wide floodlighting strategy to demonstrate how these issues can be addressed. 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.



Richmond Lock footbridge, Twickenham Bridge and Richmond Railway Bridge

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 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 Recreation Ground

Ways of improving the quality and capacity of the rugby pitches within the 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. In addition, by taking a more integrated approach, opportunities could exist which allow access to toilet facilities to support the wider use of the Recreation Ground. It would also help to support the opportunities identified above for focusing the use of the sports pitches for rugby to provide 'overspill' opportunities for the existing rugby clubs within the Park and for local schools.

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

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



Footpath from Thames Towpath



Recreation Ground Playground



Recreation Ground rugby pitches

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 lawned sunbathing outdoor areas and external 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’ October 2017 document need to be fully considered and proposals justified within this context.

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 Buildings.

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 that site make an important contribution to the indoor sports provision in the borough. Consequently their loss would not be supported unless it is demonstrated that they are no longer needed or have been replaced elsewhere.



Railway Bridge underpass



Recreation Ground



A316 Underpass



Richmond Athletic Association Ground



Pools on the Park



Information signage

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 cyclists.

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

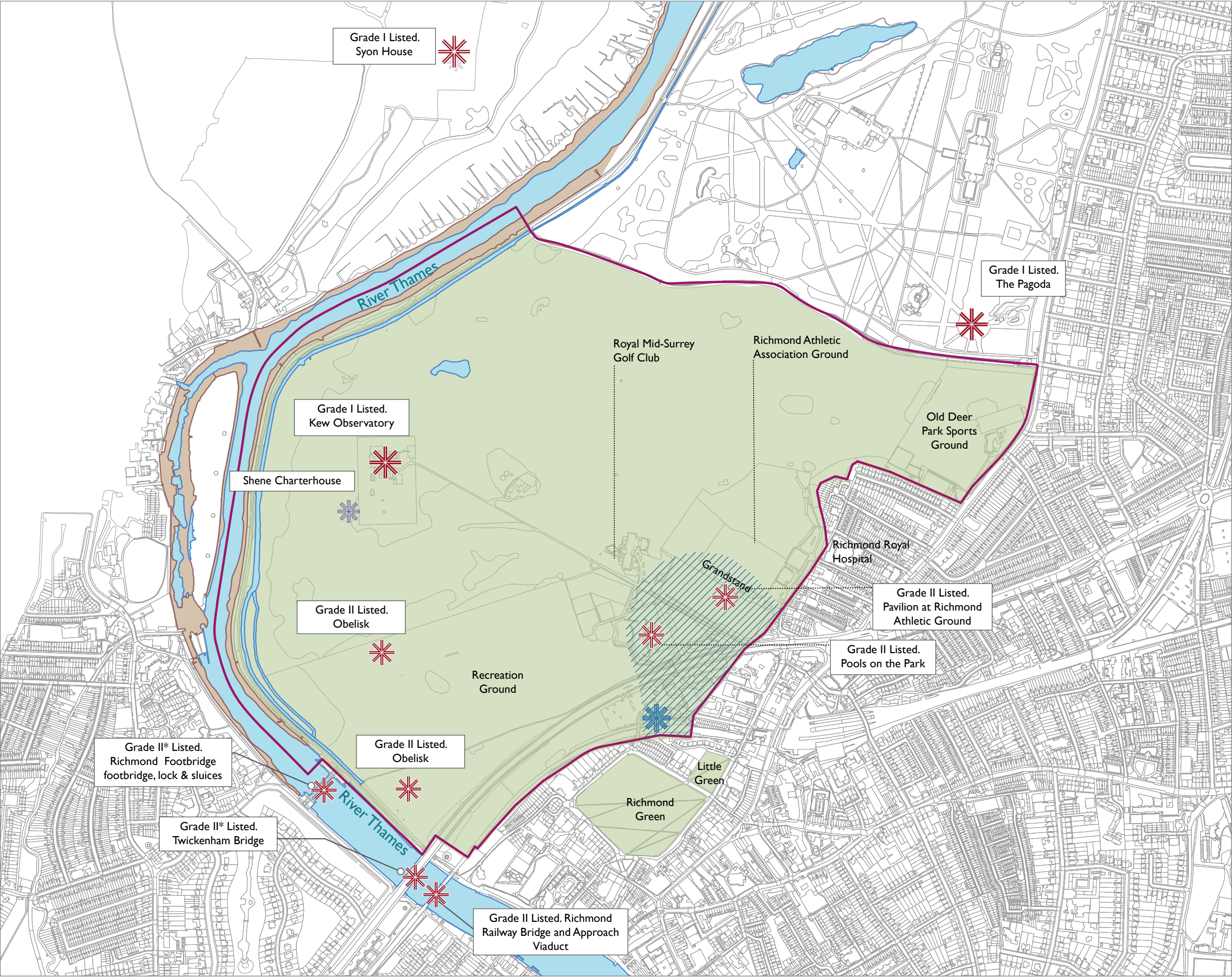
Any co-location would need to take into account the practical and operational needs of the various uses, together with the historic and planning policy considerations. Individual users needs include for example, appropriate levels of on-site security provision for the uniformed groups, and St Johns need 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 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 Scouts, 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 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 building continues to be needed to support the operational requirements of the business and therefore has not been identified as part of any wider proposals.

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

Figure 5: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 Thames Landscape Strategy and 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 to identify and implement opportunities to enhance the biodiversity offering within appropriate parts of the Park.
- For the Council and the Royal Mid-Surrey Golf Club (as lessees) to work with partners including the Thames Landscape Strategy to undertake works to reopen key meridian line views and develop a strategy to ensure that there is a regular programme of works to keep the views open.
- 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) work with Transport for London to secure the re-opening of the A316 pedestrian underpass.
- For the Council (as lessee) to review opportunities for and, if appropriate, implement improvements to 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 and with Transport for London to review and, where appropriate, secure improvements to access and egress from/to the A316.
- For London Scottish, London Welsh and Richmond Rugby Football Clubs to work with the Council to maximise the current capacity of the rugby pitches within the 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.
- 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.

