

Teddington Society Objection

APP/L5810/W/18/3205616

FAO Mr Tim Salter (tim.salter@pins.gsi.gov.uk)

14 August 2018

Dear Mr Salter,

Teddington Society Objection to Quantum Teddington Development Ltd's appeal to the Planning Inspectorate on the grounds of non-determination of LBRuT Planning Application 18/0151

We, the Teddington Society, refer to the above appeal by developer Quantum Group to the Planning Inspectorate on the grounds of non-determination by LBRuT of Planning Application 18/0151 for 107 apartments and other associated works on Udney Park Playing Fields, Teddington.

The Teddington Society, formed in 1973, is one of the most active community amenity groups in the Borough of Richmond. It is widely recognised as the organisation most representative of the local Teddington community, with both individual and corporate members.

Background to this application

This application has attracted thousands of representations – almost certainly the largest number in LBRuT planning history. The LPA had a major task in evaluating them all and ensuring that statutory consultees, such as Sport England and the GLA, submitted their views in a very short period which included pre-election “purdah” and a change of administration.

Despite more than 1,500 written objections from individuals, local and national sporting organisations and leading local sports personalities, the applicant has appealed on the grounds of non-determination, rather than continuing to engage with the LPA. We question the applicant's haste in doing so.

The Planning Inspectorate deadline for representations of 17 August falls in the summer holiday period when parents and their children, who would be most affected by the applicant's proposals, may be away.

We consider that it would be appropriate to delay the deadline for representations for a few more weeks to allow more submissions and include the outcome of the LPA Planning Committee meeting scheduled for 26 September. The outcome of the appeal will affect our community for ever – a few weeks in that context is immaterial.

We understand that the dates proposed by the LPA for the public inquiry are between 18 February and 4 March 2019, i.e. during schools' half-term holiday. Inevitably this will inhibit wide public attendance at the hearing. We request a review of these dates and also believe that the proposed location of the inquiry, the LBRuT Council chamber, would not have adequate capacity.

Local Green Space

In 2016 the Teddington Society, together with the Friends of Udney Park, made a community application for Local Green Space status for Udney Park Playing Fields. This was approved by the LPA in cabinet on 13 December 2016, incorporated into the emerging Local Plan, and passed through appropriate public consultation as part of the preparation of the Local Plan.

In his final report on the Richmond Local Plan, the Planning Inspector ruled that the LPA had not provided sufficiently robust analysis for this decision. We believe independent evidence clearly shows that Udney Park meets the Local Green Space criteria of being "special" to the community. Further, we understand the LPA intends to provide more robust justification as part of a future Local Plan review. However, that would be after this application is determined and would be too late to help protect the fields, as the LGS legislation is intended to do.

The Inspector did not raise questions about the Council's assessment of LGS status for Udney at an early stage, so as joint LGS applicants we had little chance to provide any further evidence, or make counter arguments against any representations made by the applicant in opposition to LGS status.

Finally, the Inspector's concerns were not noted at the Main Modifications stage but only in the Final Report, limiting the time available to provide supporting arguments.

Judicial Review of Local Green Space decision

We understand that an application for a Judicial Review of the Inspector's decision to remove LGS has now been made. We request that the appeal to the Planning Inspectorate should be delayed until the outcome of the Judicial Review application is known, as it could have a significant impact on the Inspector's deliberations.

Community Engagement

Despite the weight given to community engagement in Quantum's application, the preponderance of organisations publicly supporting Quantum's application are those benefiting from the development – i.e. discounted or free ownership of the remaining portions of the site. Most of the public support and comments on the LBRuT website originate through Park Road Surgery and TCSGCIC – as such we believe they are more in the nature of representations by the applicants themselves rather than expressions of local opinion generally.

The Teddington Society is close to the local community and believes that the applicant's claim of community engagement is inadequate and limited. In particular we wish to impress upon the Inspector the efforts the Teddington Society has made to reach a community consensus on the future of these playing fields.

The Teddington Society has tried hard to broker a better outcome for all parties.

Imperial College and Teddington Society

From the start we tried to encourage Imperial to honour the wishes of Udney Park's donor Lord Beaverbrook, and the covenants he stipulated, by disposing of the playing fields to an organisation that would preserve the entire site for sport. Together with our MP, now Sir Vince Cable, we met the Chair of Imperial's Council to press for a sale to one of the local community bidders.

Teddington Society consistently tried to engage with Quantum

When Quantum outbid the three local bidders to buy the site from Imperial College we accepted them as Corporate Members and met with their Operations Director, hoping to influence their proposals and achieve a good community outcome. We invited Quantum Board Directors to meet us but did not receive a response.

TCSG Community Interest Company and Teddington Society

When TCSGCIC was formed to manage the sporting element of the application we invited two CIC directors to present their case to our Executive Committee. Quantum did not provide financial information, but informal estimates by professional surveyors indicated a likely minimum gain of £30 million from their development if approved.

We twice wrote to the CIC asking that in the public interest a copy of the contract between themselves and Quantum should be made available; they did not respond. We believe this would be a material document in assessing the viability of the proposed sporting development.

Use of the Playing Fields by the Teddington community

Quantum and the CIC state that as a "private ground" under Imperial's ownership the site had "no recreational value" but that the CIC would make the (much reduced) area of playing pitches available to the entire community. We believe the first claim to be inaccurate. The fields had been used by many clubs, schools and other organisations in Imperial's time – with an open invitation for potential users to request access.

In contrast, in the period while the CIC have been running the site, usage has dropped below the levels achieved by Imperial. The playing fields are practically disused during the week and much of the weekend. Teddington parents cannot get access for their children to play sport on Udney – and cricket, which has been played at Udney for decades, is no longer welcome or possible.

TCSGCIC has not published a viable business plan covering the eventuality, if planning approval is granted, of Quantum disposing of the site (the Quantum Prospectus to Investors, obtained by an FOI request, states this as their intention).

Use of Quantum partner databases

The partner clubs in the CIC – **T AFC and TRC** – have been canvassing their members to persuade the parents of youth members to support the planning application. The bulk of the supports so obtained are on standard templated forms drafted by the CIC/Quantum, requiring a simple website “click” to generate a letter. We believe the Inquiry should consider the methods employed when judging the level of support locally. As stated above, we believe these standard letters of support should be treated as representations of the applicants themselves rather than indicators of local feeling.

Over 100 support comments were placed by the members of one local sports club (not in the CIC) on the LBRuT planning website. Subsequently the club’s secretary formally distanced the club from this application.

When the Teddington Society learned that **Park Road Surgery (PRS)** had reached an impasse with the Council in their search for alternative premises we invited their spokesman to a meeting with the Society’s Executive Committee. Since then we have been unwavering in our efforts to support and help PRS find a suitably located new home. Other options exist.

However, the offer by Quantum of a half-acre site at “health-use value” was clearly persuasive to the partners at PRS. PRS canvassed their 13,500 patients by email and post seeking support for Quantum’s planning application. Both patients and medical professionals have expressed discomfort at this, as some consider this approach to patients to be inappropriate. As a result of a complaint to NHS England, PRS have recently removed Quantum’s publicity materials from the surgery.

More than half of all submissions in support of the planning application have been made on standard templated letters from PRS patients. As above, we believe these should be treated as representations made on behalf of the applicants rather than independent comments.

Analysis of objections and supports

At the time of writing there are about 1,500 individually written objections on the website, mainly from local residents. There are only about 160 individually written letters supporting the application. Some supports are from addresses far from Teddington – e.g. Jersey and Scotland.

Objectors include prominent local sportsmen: Sir Mo Farah CBE, JPR Williams MBE, Paul Sinton-Hewitt CBE (the Park Run founder), and Bill Sweeney (CEO of Team GB/British Olympic Association). Many local, London-wide and national organisations have also submitted objections to the planning application. The application is also

opposed by environmentalists – the site hosts rare bat species, a fact omitted from Quantum’s initial report.

Jack Kidd (Lord Beaverbrook’s grandson) expressed particular outrage on behalf of the donor’s family at the proposed development of a War Memorial Playing Field. The donor, Lord Beaverbrook, was one of only two men who served our country in wartime cabinets in both World Wars.

Sir Vince Cable MP and Teddington Society

When the Teddington Society Executive met with local MP Sir Vince Cable in December 2017, our efforts to find solutions for the Udney Park site were discussed. At the time it was expected that this would be for local councillors in Planning Committee to resolve. However, now that Quantum has appealed to the Planning Inspectorate, Sir Vince has written to the Secretary of State stating:

“The overriding consideration has to be the fact that the development represents a serious breach of the Council’s policy, which has wide support, to retain green open space (which would be lost permanently) and to retain playing fields which are widely used by the local community.”

There is a community alternative ready to acquire the site from Quantum

The two lead clubs in the CIC are Teddington RFC and Teddington Athletic FC, both of whom have their own pitch space already and have, or are building, brand new grant-assisted pavilions. TRFC has three pitches and a new pavilion in Bushy Park, and TAFC shares the pavilion and grounds of Teddington CC, which is currently building a new £1.5m pavilion also in Bushy Park.

Although the CIC maintains that Udney Park would not be viable as a community facility, they have not published their own business model covering the period after Quantum’s exit.

There are three local clubs that have large memberships and no permanent home or pavilion: Hearts of Teddlothian FC is the second largest junior football club in the Middlesex FA region; Harlequins Amateurs RFC is the most significant sporting name in the borough; and Teddington Hockey Club is the oldest hockey club in the world. Local schools are also short of outdoor recreation space and have expressed interest in using Udney Park.

A viable alternative plan for Udney Park is ready to launch should this application fail and Quantum seek an exit. It is clear that a large and attractive refurbished pavilion and 13 acres of playing fields could be sustained by the local community; clubs currently have waiting lists both for junior and adult members who travel long distances for home games. The two local state schools would get free access and independent schools would pay for use. The playing space that these clubs and some schools use may also be under threat from the proposed expansion of St Mary’s University.

Teddington Society Members are not “Nimbys”

We supported the plans for a major development of 230-plus apartments at Teddington Riverside (a brownfield site) just a few hundred yards away from Udney Park. The site owners engaged extensively with us and the community, their CEO addressed our AGM, and the plans were adjusted after receiving feedback. Consequently, there was no planning battle.

In contrast, and in opposition to their stated wish for community engagement, Quantum’s approach appears to be to challenge clearly stated local and national policies through legal argument.

Summary

The Teddington Society objects to this planning application in principle as being:

- 1) Contrary to the site’s OOLTI status, its local strategic status and the express wishes of the site’s original donor. We believe planners have a special responsibility to protect green spaces in urban environments.
- 2) Against National Planning Policy which considers residential development on playing fields as inappropriate and local policy as expressed in the joint LBRuT and Sport England “Playing Pitch Strategic Review”.
- 3) Against National Health Policy which values exercise and the provision of sporting facilities as essential to the nation’s health, especially of young people.
- 4) Against the GLA’s London Plan. Allowing residential development on playing fields would be an immensely damaging precedent for all London Boroughs.
- 5) Against environmental regulations. The site is habitat to nine species of bat – including rare species, all of which are covered by European Protected Species legislation. South West London Environment Network (SWLEN) and London Wildlife Trust (LWT) have both submitted objections to the application.
- 6) Against, we believe, the wishes of the majority of Teddington residents plus many well-known sporting figures and organisations.

The Teddington Society has done its best to broker a solution which would be acceptable to all parties. A viable alternative exists for a 100% community use facility. There were three local community bids for the site prior to Quantum’s acquisition if the current planning status is confirmed.

We believe in Udney Park Playing Fields’ previous and future potential public recreational use, their historical significance, environmental importance, and in the

strength of opposition from the public and stakeholder organisations to the proposals by the applicant.

On behalf of the Teddington community we therefore ask the Planning Inspectorate to refuse the Appeal.

Nick Picton

**Secretary
The Teddington Society**