

GREATER LONDON AUTHORITY  
Development, Enterprise and Environment

**Andrew Seaman**  
Planning Inspector  
The Planning Inspectorate  
3G Hawk Wing  
Temple Quay House  
2 The Square  
Bristol  
BS1 6PN

**Our ref:** LDF27/LDD08/CG02  
**Your ref:** PINS/LS810/429/10  
**Date:** 09 October 2017

Dear Mr Seaman

**Planning and Compulsory Purchase Act 2004 (as amended);  
Greater London Authority Acts 1999 and 2007;  
Town and Country Planning (Local Development) (England) Regulations 2012**

**Re: Richmond Local Plan**

Thank you for seeking a view from the Mayor of London as to whether, in accordance with section 24 (1)(b) of the Planning and Compulsory Purchase Act 2004, the draft Richmond Local Plan is in conformity with the London Plan. The Mayor has delegated authority to me to respond on his behalf, and this response includes the view from Transport for London (TfL), which he supports.

As set out in my original statement of general conformity, any development that is built on the MOL part of the site and is not an appropriate use will be considered inappropriate development. Despite the productive dialogue with Richmond and the proposed early changes, the Mayor remains of the opinion that, Richmond's draft Plan would not be in conformity with the London Plan.

**Car parking**

The proposed parking policy is contrary to the London Plan parking policy 6.13 and Addendum table 6.2 car parking standards, which clearly applies maximum parking standards. The Local Plan policy LP45 and parking standards in Appendix 3 uses Public Transport Accessibility Level's (PTAL's) to set parking levels. In particular, the proposed parking standards set out for new residential development within PTAL 0-3 are not compliant with the London Plan.

With regard to non-residential parking, the standards for *General/Special Industrial* use as set out in Appendix 3 should be amended to read "*Parking and servicing requirement to be demonstrated and provided off street (unless there is a sound planning reasons for providing on street) in accordance with the London Plan*". For sports and leisure complexes the provision of coach parking should be as directed by the London Plan to reduce congestion and improve visitor safety.

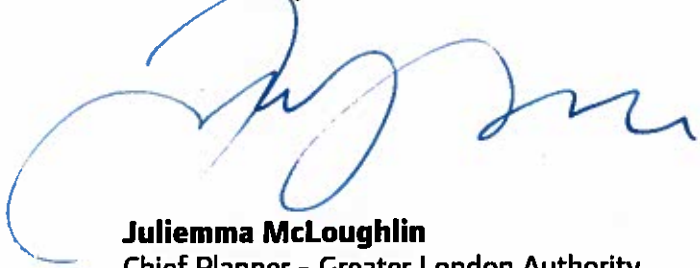
**St Mary's University Site**

Although the Mayor of London and Richmond have signed a Statement of Common Ground, which the Mayor considers provides further clarity in the supporting text that land designated MOL will be

protected, he considers the wording in the main policy is ambiguous and could lead to extensions and new build elements beyond the existing developed land.

I hope that this answers your enquiry. If you would like to discuss any of my representations in more detail, please contact Celeste Giusti (020 7983 4811) who will be happy to discuss any of the issues raised.

Yours sincerely,



**Juliemma McLoughlin**  
Chief Planner - Greater London Authority

Cc Lucinda Turner, TfL