

Local Plan – Other comments received not relating to Proposed Main Modifications 22 December 2017 to 2 February 2018

Respondent Name	Comment	Officer response
<p>Charmian Goldwyn</p>	<p>I welcome the development at the Stag brewery, and hope there will be a majority of affordable housing there, besides the amenities that are currently being promised.</p> <p>I live in Barnes, and I frequently travel to Kew or Richmond by car via Mortlake high Street and the Lower Richmond Road. There is already a great deal of congestion at rush hour, and it is obviously going to be much worse when the Stag brewery development is built, people are living there and the school is in action.</p> <p>I think we have to think big, and investigate the possibilities of bridges or tunnels at the Chalkers Corner junction and the Sheen Lane level crossing. It has been done in many areas, for instance at the Hogarth roundabout, so why not here ? And there is a possibility of using Williams road as a slip road to take traffic to Chiswick bridge.</p> <p>There will be many cars accessing the site, human nature as it is will need to travel in their cars for many reasons. A multi story car park should be built within the site.</p> <p>Finally please use your influence on TfL to improve the many existing bus routes for obvious reasons.</p> <p>Also note that secondary children are not normally driven to school, whereas primary children clog up the roads every morning. Including my grand daughter in my car when I have to take care of her. So a secondary school is in some ways preferable.</p>	<p>Passed to Development Management to notify of opportunity for public consultation on forthcoming planning application.</p>
<p>Lichfields on behalf of the Rugby Football Union (RFU)</p>	<p>Site Allocation: SA11, Twickenham Stadium Representations to Main Modifications Consultation, January 2018</p> <p>The Case Site SA11 Twickenham Stadium has been the subject of a number of representations submitted on behalf of the RFU and was debated at EiP Hearing Session 4 on 28 September 2017. During the EiP, it was made clear that the NPPF (paragraphs 17, 19, 20 and 21 3rd bullet) support growth at the Stadium site and it was noted that there is a need for more flexibility</p>	<p>Currently planning application(s) under consideration, and continue conversations with the Council in terms of the RFU's longer term plans and strategies for their estate.</p>

within the site allocation policy to enable it to be robust and deliverable throughout the Plan period by adapting to change. The Inspector therefore commended the Council to reconsider the proposed wording to draft policy SA11 to enable the policy to be more flexible and to provide guidance for development at the site in the longer term, which would 'enable' delivery. This is also made clear in the NPPF (paragraphs 157, 160). Without this change, it was put to the Inspector that the Plan was considered to be 'unsound'.

The Council maintained that whilst they will support growth in terms of physical structures they will not support growth in terms of diversity of operations of the Stadium as they consider that these uses should be considered and assessed against other Local Plan policies. However, as any proposal requiring planning permission would need to accord with policies within the Local Plan, it is not necessary to limit the principle of the support of growth of operations within the site allocation. One of the core principles in paragraph 17 Of the NPPF is to 'proactively drive and support sustainable economic development' and that 'every effort' should be made to meet such needs. This would never be achieved if the Council maintained the approach that there can be no support for any growth that may have some impacts that would need to be assessed through the development management process.

The RFU notes that the Main Modifications propose no amendment to the site allocation policy, despite the Inspector's commendation.

The RFU and the Council have already made their cases to the Inspector at both the EiP and throughout representations submitted. Therefore, the arguments are not repeated here. The below sets out the RFU's proposed policy for clarity and to ensure that the Plan is in accord with the NPPF and Sound. Without the changes set out below the Plan will not be positively prepared, effective or consistent with national policy as it does not appropriately support a range of changes at the Stadium site for the duration of the Plan period.

RFU Proposed Modification: SA11

The RFU explained why it is important and appropriate to include in the Policy the scope for both change in terms of physical development and operational uses and they propose the following modifications to SA11:

The Council supports the continued use and ~~improvement~~ growth of the grounds for both physical structures and diversity of operations (eg for non-sporting purposes such as concerts, events and other leisure uses). Appropriate additional facilities including ~~a new east and north reconfiguration and/or redevelopment of the stands, indoor leisure, hotel or business uses, as~~

	<p><i>well as hospitality and conference facilities, may <u>will</u> be supported, provided that they are complementary to the main use of the site as a sports ground. <u>Mixed use development, or residential, would also be acceptable.</u></i></p> <p><i><u>Explanatory Text: All proposals at the grounds will be subject to being fully assessed and considered against other Local Plan Policies with particular regard to highway and residential amenity impacts.</u></i></p>	
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