

London Borough of Richmond upon Thames
Response to the draft Ham and Petersham Neighbourhood Plan

Thank you for your consulting the London Borough of Richmond upon Thames on the first draft version of the Ham and Petersham Neighbourhood Plan. The Council acknowledges the progress of the Neighbourhood Forum in reaching the stage of consulting on the draft Neighbourhood Plan. The Council is generally supportive of the Plan and appreciates all the work invested in the process by those involved.

The following comments are provided to assist the Forum in producing the submission version of the Plan, and they are based on the information available at the time of reviewing the draft Plan. It should be noted that the Council's comments represent a combined response from different services areas across the Council.

We provide comments on technical matters and we also touch on the 'basic conditions', which will need to be addressed in the next stage of the plan-making process. We have made a number of suggestions to consider prior to submitting the Plan to the Council. This is to ensure that it is successful at a subsequent examination and to ensure it provides a strong and clear policy framework for the Ham and Petersham Area. There are some areas of concern where the Council's view is that a different or more prescriptive policy approach to the national/regional/local approach may not be justified. In addition, we are suggesting several editorial and presentational changes. There is a schedule included within this response, in which we provide the details and recommend changes to the Plan, and which we hope the Forum finds helpful in addressing the specific comments and ensuring the Plan will meet the 'basic conditions'.

Overview of comments in relation to the 'basic conditions' and main areas of concern:

- Precision and clarity of policy wording: It should be noted that national guidance states that "*A policy in a neighbourhood plan should be clear and unambiguous. It should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications. It should be concise, precise and supported by appropriate evidence.*" It is important to note that some of the policy wording within the Neighbourhood Plan does not meet this requirement, and therefore this will need to be addressed when producing the submission version to ensure there is clarity in the interpretation and implementation of the Plan.
- General conformity: One of the 'basic conditions' is for the Neighbourhood Plan to be in general conformity with the strategic policies contained within the Development Plan. Whilst a draft 'basic conditions' statement has not been provided at this stage (note that one will be required for Submission), we recommend that the Forum produces this 'basic conditions' statement early on to ensure that the Neighbourhood Plan and its policies are in general conformity with the Richmond Local Plan. We have highlighted some potential conflicts with strategic policies in the detailed schedule below, which we believe can be addressed through amended wording and changes to policies.
- Clear justification and evidence: There needs to be a much clearer link between the policies and supporting text to the evidence base used to inform the policies. This is particularly important where the Plan's policies are suggesting an approach that differs from the Local Plan, regional or national guidance. Throughout the Neighbourhood Plan, there is frequently a lack of justification or reference to the evidence base to underpin the approach taken. It is therefore suggested that each policy is reviewed to ensure it has the necessary context and evidence (including references to the evidence base) to underpin its inclusion and approach.

This is to ensure that the Plan will sufficiently address the ‘basic condition’ relating to ‘Having regard to national policies and advice contained in guidance issued by the Secretary of State’.

- Policy, supporting text and statements: There appears to be some confusion as to what a policy or a statement is, and what goes into the supporting text – some examples of this have been highlighted in the detailed comments in the schedule below.
- Sustainable Development: One of the ‘basic conditions’ is that the Plan contributes to the achievement of sustainable development. Whilst the majority of policies are seeking to support sustainable development, some policies are overly prescriptive and currently not in conformity with national / regional or local policies, particularly those that may affect the viability and deliverability of new housing development, such as the regeneration of Ham Close.
- Confusion around the Community Infrastructure Levy (CIL): Issues relating to CIL funding and what projects should be prioritised are not policy matters and therefore such references should be moved to a different section outside of the main Plan (e.g. within an Appendix or the non-planning parts of the Plan).
- Monitoring: The Plan would benefit from a section that covers monitoring of the Plan. This should ideally be included within the submission version of the Plan.
- Proposals Map: We recommend that one Proposals Map is being produced for the Ham and Petersham Neighbourhood Plan area. This should not simply repeat the layers already shown on the Council’s Proposals map, but instead focus on showing the boundaries of policies set out in the Plan which have spatial implications i.e. areas where specific policies apply, such as the shopping frontages, MOL etc. This could be produced for the submission version of the Plan.
- Strategic Environmental Assessment (SEA): One of the key elements of the ‘basic conditions test’ relates to SEA, which is required where a Neighbourhood Plan is likely to have significant environment effects. To date, the Forum has not submitted any information in this regard to the Council, and we strongly recommend that SEA screening is carried out as soon as possible to determine whether a SEA is required. Ideally, information on the SEA should have been published alongside this pre-submission consultation of the draft Neighbourhood Plan.

The schedule provided below sets out the detailed comments in relation to the relevant sections / paragraphs of the Plan, including ‘essential’ as well as ‘desirable’ changes as required.

It should be noted that the Council reserves the right to consider at a later stage whether all the ‘basic conditions’ are met. Therefore, at this stage the Council is focusing on providing constructive comments on the emerging Plan, and other issues, such as compliance with Strategic Environmental Assessment (SEA) requirements, will be considered at the subsequent plan-making stages.

We look forward to an ongoing discussion with the Forum to ensure that the emerging Plan meets the ‘basic conditions’. We are also happy to meet with representatives of the Forum to clarify any points raised within this response if required.

Yours sincerely

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Section of Plan	Council comments	Changes required
Introduction		
Vision	<p>This is a very limited vision, i.e. to retain the identity of Ham and Petersham. For example, the area is relatively isolated, there are limited local employment opportunities, with traffic being a major problem in the area. The vision could be more ambitious in terms of trying to address some of those problems and key issues that you have identified, rather than simply retaining the identity of Ham and Petersham.</p> <p>We also recommend changing the description from 'semi-rural' to something that better reflects the location of Ham and Petersham within Greater London. It may be more appropriate to use 'relatively isolated'.</p>	<p>Essential: use alternative wording to 'semi-rural'</p> <p>Desirable: expand on the vision and consider addressing key issues within it and how the area should develop within the next 15 years</p>
Paragraph 1.8.6	The Plan makes no reference to housing new families and instead only focuses on meeting the needs of existing residents. This view is too narrow and should be amended.	Essential: ensure the Plan does not only focus on meeting needs of existing residents
Section 2 – Character and Heritage		
General comments	<p>The Council welcomes in principle this section, although overall it is quite brief and does not contain much detail.</p> <p>Providing details on neighbourhood character areas in Appendix 4 fits generally well with the overall Village Plan SPD approach elsewhere in the borough (<i>see further comments below</i>).</p> <p>The Plan generally deals with the non-conservation areas of Ham & Petersham, and projects which do include the conservation areas. The conservation areas were covered in detail in the Character Appraisal & Management Plan, and the conservation area study for most of the area is more recent than most CA studies, produced in 2007. However this is different to the other village plans and the approach may need to be further clarified.</p>	N/A
Character and Heritage – general	There is a lack of photos and visuals, particularly within this section, which could make the Plan more readable, and also provide examples of local characteristics, materials and good practice, as well as guidance on shopfronts, front gardens and parking. It would be beneficial if this aspect was added to the Plan.	Desirable: incorporate more photos and visuals to help describe the character of the area.

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Map 3	<p>There are conservation areas missing from Map 3 Character and Heritage:</p> <ul style="list-style-type: none"> • Star & Garter/ Petersham Common area; • Parkleys Estate; • Section of Ham Lands opposite Teddington Lock; • Front gardens area Church Road. <p>The light green tone (e.g. Ham Lands) does not appear in the Key. These omissions are essential to correct. There may be an attempt to put too much on this map; an additional map would help, which could also show other designations, such as Registered Park & Garden and the Thames Policy Area.</p>	<p>Essential: ensure all conservation areas are covered in Map 3 and that the correct key is used</p> <p>Desirable: consider an additional map</p>
Paragraph 2.2.3	Ham House and Gardens should say ' <i>...and associated landscape</i> ' as it includes Avenues etc. beyond the gardens.	Add ' <i>...and associated landscape</i> '
Paragraph 2.2.6	Within the ultimate line, add ' <i>...to their conservation and settings...</i> '	Add ' <i>...and settings...</i> '
Paragraphs 2.2.7 – 2.2.10	These paragraphs are not very clearly laid out regarding existing conservation area studies. The Plan should provide planning guidance rather than comment on whether existing studies are considered dated, as in paragraph 2.2.8, as this may date restrict the longevity of the Plan itself.	Essential: remove commentary on whether existing studies are dated, and focus on providing planning guidance
Policy C1 Protecting Green Character Paragraph 2.3.2	In referring to creation of or expansion of leisure facilities on green spaces, we are concerned that this could be misinterpreted – an applicant may use this statement to justify built development on green spaces, including indoor sport facilities; the Council recommends stronger alignment to the wording of the relevant policies within the Local Plan, particularly LP 31.	Essential: remove ambiguity and make the policy clear that built development is generally inappropriate on green spaces
Policy C3 – Protecting the Character of Built Areas Paragraph 2.5.1	<p>The statement “All new development will be expected to have regard to its context in terms of scale, height, density, form and appearance.” is not a policy but a statement, particularly due to the reference of '<i>to have regard to</i>'. We recommend considering the Council’s Local Plan policy LP 1, and then to decide whether there is anything in addition to this policy that the Neighbourhood Plan might be seeking to address.</p> <p>Need to add '<i>materials and landscape</i>' to '<i>in terms of...</i>'.</p>	<p>Essential: re-word this policy to ensure it is a policy and not a statement</p> <p>Add '<i>materials and landscape</i>'</p>
Policy C4 Routes – Paragraph 2.6.1 and 2.6.2	Whilst the principle of this policy is supported in terms of achieving permeability of the area and not accepting gated developments, the policy could potentially restrict the re-provision of routes if for example an existing route is not appropriate and there may be a way of achieving improvements in permeability by amending existing routes.	Essential: re-word the policy to also allow for amendments of existing routes provided that overall there is an improvement in permeability
Section 3 Housing		
Paragraph 3.2.5	To accurately reflect the housing context, paragraph 3.2.5 should be amended to state “New affordable housing in the area is being provided as part of new development, or wholly by a housing partnership partnership Richmond Housing Partnership and other Registered Providers”.	Essential: remove reference to ‘a housing partnership’ and replace with ‘ <i>Richmond Housing Partnership and other Registered Providers</i> ’

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Paragraph 3.2.6	<p>This states “Affordable housing as a proportion of the total housing stock in the Neighbourhood area should fall no lower than the existing level of 18%”. The source of this figure is not clear (also paragraph 1.8.3 is not clear in this respect).</p> <p>The Council suggests it should be noted that the percentage of affordable housing in the area cannot be controlled solely by the planning system. Affordable homes will continue to be lost through the rights of existing social housing tenants to acquire their homes through Preserved Right to Buy or Right to Acquire. The Council’s view is the Plan should set out that development proposals should seek to avoid a net loss of affordable housing and seek to provide additional affordable housing in line with Local Plan policies LP 35 and LP 36.</p>	Essential: amend the policy to ensure it is in accordance with Publication Local Plan LP 35 and LP 36
Policy H1 – Residential Development (Paragraphs 3.3.2 and 3.3.4)	<p>The Council is concerned that paragraph 3.3.2 and 3.3.4 are too specific and go far beyond the requirements of the Local Plan policy LP 44. No evidence has been provided to justify this local policy approach and this will be required as part of complying with the ‘basic conditions’.</p> <p>The London Plan and Mayor’s Housing SPG are clear that the density levels specified therein are for guidance only; development above these densities may be appropriate subject to being tested against a number of relevant considerations. The policy implies that if an applicant proposes major or higher density residential development, this will only be appropriate if it increases the PTAL of an area. This could be seen as setting barriers to any larger development in the area. Therefore, linking major / higher density development only to PTAL is a very limited view, and disregards the context, existing neighbourhood and setting of an area to determine what development and density may be appropriate.</p> <p>The policy should be amended to reflect a broader consideration of density, and that PTAL is only part of that.</p>	Essential: the policy needs to be amended to ensure it is in conformity with higher-level planning policies
Policy H1 and specifically paragraph 3.3.5	<p>It should be noted that all developments with new floorspace are required to contribute to CIL, and thus developments will already make a contribution towards, e.g. transport; therefore, a developer could say they already contribute to transport by paying CIL to the Council, which in turn can be spent on transport projects. The content of planning obligations including improvement of public transport links can be determined on a case by case basis with reference to relevant planning obligation policies.</p>	Essential: the policy needs to be amended to ensure it is in conformity with higher-level planning policies
Policy H2 – Housing mix	<p>The Council is concerned that paragraph 3.4.1 sets an unduly prescriptive approach as to the unit sizes to be achieved. Reference to 10 and 20 units is also arbitrary.</p> <p>Paragraph 3.2.7 refers to expecting a mix of sizes of units, taking into account neighbourhood and local housing need.</p> <p>The Council’s view is that it may not be necessary to be overly prescriptive in paragraph 3.4.1. The Local Plan Policy LP 35 is not specific as to unit sizes – this is to be determined by the characteristics of the locality.</p>	Essential: the policy needs to be amended to ensure it is in conformity with higher-level planning policies, including Local Plan policy LP 35

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Policy H3 – Affordable Housing	The Council is concerned that paragraph 3.5.1, as with paragraph 3.4.1, should avoid being prescriptive about unit sizes which will be dependent on the affordable housing tenure mix and which will also be dependent on scheme viability on a case by case basis. Local Plan Policy LP35 does not specifically require larger family homes.	Essential: the policy needs to be amended to ensure it is in conformity with higher-level planning policies, including Local Plan policy LP 35
Paragraph 3.5.1	The Council is concerned at the statement at paragraph 3.5.1 that “The balance of social and market housing in the neighbourhood area should be maintained.” As set out above in relation to comments on 3.2.6, this control may not be possible through planning, and could suggest that Ham Close regeneration would be unacceptable (notwithstanding viability) if its viability was dependent on providing more than 50% market homes in the additional provision.	Essential: the statement needs to be removed/amended to ensure it is in conformity with higher-level planning policies, including Local Plan policy LP 35
Paragraph 3.5.2	The Council is concerned at paragraph 3.5.2, as stated above in relation to paragraph 3.2.6.	Essential: amend the policy to ensure it is in accordance with Local Plan LP 35 and LP 36
Policy H4 – Housing Standards	<p>Paragraph 3.6.1 encourages in all new housing ground floor homes to meet Building Regulations M4(3) wheelchair housing. This exceeds the requirements of national policy and Local Plan Policy LP 35, and therefore if the Forum continues to pursue this approach, strong evidence will be required to justify this approach as this could be unduly onerous and impact on schemes’ viability, particularly in relation to affordable housing.</p> <p>The Council questions the evidence base to demonstrate a lack of homes for older people (as stated at paragraph 3.6.2). This could be unduly onerous and impacts on scheme viability particularly in relation to affordable homes.</p> <p>Our understanding is that these higher optional Building Regulations can only be applied to new build housing, not conversions or change of use proposals. We have found the term ‘new housing’ can be misinterpreted, so this may need to be clarified.</p>	<p>Essential: amend the policy to ensure it is in accordance with Local Plan LP 35</p> <p>Desirable: consider definition for ‘new housing’</p>
Policy H5 – Design principles for housing development	<p>The Council is concerned at the approach to setting maximum habitable rooms per hectare, directly linked with PTAL, which is different from the approach taken elsewhere in the borough, and therefore we consider that this is not in general conformity with Local Plan policies LP 1 and LP 2. A strong evidence base would be required in order for the Forum to justify this approach.</p> <p>Density standards should not be applied rigidly – clearly Petersham Road has a much different low density character (with Conservation Area protection) compared with Ham Close - but 250 hrh/ha will surely be inappropriate in the local context notwithstanding the higher PTAL rating. Setting a non-flexible threshold such as 200 or 250 hrh may not allow maximisation of use of brownfield land, and the Council feels it should be the context, character and setting of an area, buildings and spaces that determine the appropriate densities.</p>	Essential: amend the policy to ensure it is in accordance with Local Plan LP 1 and LP 2

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Paragraph 3.7.2 Criteria (1) and (2)	<p>The references in paragraph 3.7.2 criteria (1) and (2) to exemplary design could suggest an unreasonably high standard compared with 'high' in Local Plan policy LP 1, again imposing cost implications on new housing (particularly affordable).</p> <p>Building heights will be a consequence of accepting higher density development if justified (see comments on paragraph 3.3.4 above).</p> <p>The supporting text to the policy should acknowledge that there are already areas within Ham, i.e. Ham Close, with existing block heights up to five storeys. Criterion (2) could therefore be overly restrictive and it is recommended to adopt an approach similar to that set out in policy LP 1 in this regard.</p>	Essential: amend 'exemplary' design and align with Local Plan policy LP 1, i.e. 'high architectural design quality' and acknowledge that there are very few areas with buildings taller than 4 storeys, i.e. Ham Close
Paragraph 3.7.2 Criterion (3)	The Council considers that the statement in relation to considering reduced private open space should be amended and aligned with Local Plan Policy LP 35 (Housing Mix and Standards) as this sets out the Council's external space standards, which are expected to be met in new housing development.	Essential: amend criterion 3 to ensure this is in conformity with LP 35
Paragraph 3.7.2 Criterion (5)	The Council is concerned that the reference to considering reduced overlooking distances could be misinterpreted. It is not clear if this is about existing occupiers (i.e. properties affected by new development) or future occupiers (i.e. within new build schemes). It should reference Local Plan Policy LP 8 on Amenity and Living Conditions, which set out clear requirements for minimum distances.	Essential: amend criterion 5 to ensure this is in conformity with LP 8
Paragraph 3.7.2 Criterion (7)	The Council suggests that this criterion should refer to 'normally' to allow for single aspect units in appropriate situations e.g. south facing aspect.	Essential: add 'normally' to criterion (7)
Section 4 – Travel and Streets		
Policy T1	<p>The requirement for a 10 unit residential development to produce a Travel Plan is considered too onerous. However, development would be required to provide excellent cycle storage and if appropriate funding towards improvements of walking and cycling routes.</p> <p>For information, Travel Plans for such small schemes would be time intensive and would very likely not achieve much in terms of mode shift to sustainable transport. Each development would have to be assessed on its own merits as to whether a Travel Plan would be required.</p> <p>Car Club providers do not usually like on site provision as more often than not it is not accessible to other local car club members. Car club provision on site that is open and accessible to all resident members in the locality would be welcomed but only if there is a need for additional car club spaces in that locality.</p>	<p>Essential: amend the policy to ensure it is in accordance with Local Plan LP 44</p> <p>Recommendation:</p> <ul style="list-style-type: none"> change criterion (1) to 'developments will be expected to provide adequate off-street parking and cycle storage to minimise street impacts'. change criterion (2) to 'provide parking for car club vehicles, preferably off-street'

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Paragraph 4.2.6	The towpath is deliberately unlit for biodiversity reasons.	Desirable: add reference that the towpath is unlit for biodiversity reasons
Paragraph 4.3.6	Whilst we agree in principle with this statement, car club space should not be instead of on site car parking to the required standards for the development. There are no Community Parking Zones in this area and therefore we cannot control car ownership by occupants. If no onsite parking then there is a risk that people will park on street.	Essential: clarify that car club space should not be instead of on site car parking within the supporting text of the policy
Policy T2 – Improvements to transport infrastructure	The construction of a foot and cycle bridge linking Ham and Twickenham is referred to in Policy T2 (5) and the Implementation Programme in Appendix 3 refers to this as a ‘Short term’ priority. While this project has been recognised as an aspiration and vision within various Council’s plans and documents, it should be noted that this stage no feasibility studies have been undertaken and there is no funding in place to look at options and feasibility, nor funding any build costs. We therefore feel it is misleading to refer to it as ‘short term’, although we note that the Implementation Programme is not part of the NP.	Essential: refer to the bridge between Ham and Twickenham as ‘long term’
Policy T3 – Cycle Storage	It is noted that the standards at paragraph 4.5.1 exceed higher cycle storage than the Council’s approach in Local Plan policy LP 45 which is as per the London Plan. The Council feels that London Plan cycling standards are already very ambitious and you will therefore be required to produce evidence to justify the higher standard.	Essential: evidence will be required to justify higher cycle parking standards
Policy E3 – Electric Charging Points	EV charging points for new houses can only be provided if there is off street parking. Higher level plans and policies make explicit the provision required for EV’s.	Essential: Local / London Plan standards should be applied for EV Charging Points
Section 5 – Community Facilities		
Policy CF 2 – Community Facilities	The Plan could clarify the policy approach in relation to the existing premises if a local community facility is relocated. For example if a GP surgery or other community facility moves into new premises, it could set out the approach with regard to the existing vacated premises.	Desirable: Consider adding criteria that apply for existing vacated premises that still benefit from the D1 land use class once a service has relocated
Paragraph 5.4.3	It may be useful to have elsewhere a section in the Plan / Implementation Plan on what CIL funding should be prioritised for, as this is not a policy matter. It needs to be clarified that this is in relation to the proportion that is Neighbourhood CIL, not the Strategic CIL, as the Council’s adopted CIL Regulation 123 List applies for the latter.	Essential: CIL funding and what projects are to be prioritised is not a policy matter and this should be moved to a different section outside of the Plan, such as within a stand-alone Appendix

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Section 6 – Retail and Local Services		
Policy R1 – Enhancing Retail Uses	The Council’s view is that paragraph 6.3.1 should be amended with this change “Proposals which diversify <i>extend</i> and enhance the range of local shops, pubs, restaurants cafés and related commercial services for the local community will be encouraged.” The supporting text makes it clear that the Local Plan’s retail frontages policies are appropriate. Without this change the sentence could be misconstrued as encouraging change of use away from retail, rather than encouragement for improving the range of commercial uses.	Essential: replace ‘diversify’ with ‘extend’
Paragraph 6.4.2	It is noted that this states “There is also a perception that Ham Parade is on the edge of two boroughs and that its health and vitality have been overlooked in favour of the town centres.” The Council has provided support, and it makes an annual funding provision of £2000 from the Town Centre Opportunities Fund and £1,500 from the Xmas fund to Ham Parade, although the co-ordination of activities and spending funding in part relies on the role of volunteers along with others.	Essential: remove the statement that Ham Parade has been overlooked in favour of the town centres as this is not a policy matter.
Paragraph 6.4.4	This states one of the priorities for Ham Parade is to “....support the creation of a ‘Ham Parade Management Group’ facilitated by a part time town centre manager or retained consultant providing a voice for Ham Parade and co-ordinated marketing / promotion. Possible sources of funding for this would be secured in discussion with LBRuT.” This is noted. It is understood that more recently, a new group has emerged, the Ham and North Kingston Community Investors, whose aim is to set up a Community Interest Company to lease at least one property in the area. The Council will explore working with this group and in the future may give them the opportunity to apply for the funding available.	Desirable: it would be preferable to move this part into the non-planning section of the Plan, such as within the implementation section or an Appendix.
Section 7 – Green Spaces		
Map 8	Ensure the titles and keys are appropriate, for example, the school playing fields or the gardens of St Michael’s Convent are referred to as ‘public’ spaces. There should be more alignment with the Council’s definition as set out within the Proposals Map on what is a Public Open Space. We believe the following are incorrect on the map: <ul style="list-style-type: none"> • No 2 – add another 2 for the northern section for HCW’s • No 5 – is not both locations • No 19 – wrong place • No 7 – we believe this is called ‘The Copse’ • No 10 – not marked on the map 	Essential: make changes to the map as well as its key/legend as appropriate

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References to Ham Village Green	The Council recommends that 'Ham Village Green' (in Green Spaces as well as the Opportunities for change section later in the Plan) is not referred to as 'Village Green' within the Plan. It is appreciated that this is what it is locally known as, it is recommended to refer to The Green or Ham Green only. The reason being that a 'Village Green' is a designation as set out in the Commons Act 2006, and using the reference 'Village Green' could lead to misinterpretation or imply a wrong designation when used in a development plan document.	Desirable: replace 'Ham Village Green' with 'Ham Green' or 'The Green'
Paragraph 7.2.1	It should be noted that the grounds of Cassel Hospital are already designated in existing adopted Plans, and there is no new designation on this site and others, except for St Michael's Convent where the Publication Plan sets out a new designation.	Essential: amend text to ensure it is clear that existing adopted plans already include designations such as for Cassel Hospital
Paragraph 7.2.1	Local Nature Reserve should be capitals.	Desirable: Local Nature Reserve should be capitals
Policy G1 – Open Spaces	The Council considers this is not a planning policy as it is a statement about management plans and their review and implementation, and the policy should be reviewed.	Essential: amend this statement to ensure it is a policy
Policy G3 – Allotment Extension and Community Orchard	There are currently over 2000 plots in the borough which is a relatively large provision for the number of residents. The Council's 2010 Allotment Strategy is clear that we are not seeking to expand existing or create new allotments, but the focus is ensuring those with allotments are working them. The policy needs to refer to the Neighbourhood CIL element, noting comments above having a separate section in the Plan dealing with Neighbourhood CIL.	Desirable: acknowledge the Council's Allotment Strategy and ensure policy is aligned with LP 32
Local Green Space designation	The Council's Publication Local Plan policy LP 13 now includes a new designation referred to as 'Local Green Space'. It should be noted that the Forum has the opportunity to include new Local Green Space designations within its Neighbourhood Plan where this meets the criteria set out in paragraph 5.2.10 of the Publication Local Plan.	Desirable: consider potential Local Green Space designations
Section 8 – Environmental Sustainability		
Paragraph 8.7.2	Surface flooding can also be caused by a high ground water table. The Council's Groundwater Flooding Plan (Figure E) indicates that the entire area has some susceptibility. Note that any development must not alter or restrict existing flood flow paths.	Essential: it is recommended to add the Council's comments at the end of paragraph 8.7.2
Paragraph 8.8.3	This could mention that flow restrictions are usually required, even if discharging to a watercourse. Sewers would still be required to take the flow to the watercourse.	Desirable: add that flow restriction would be required even if discharging to a watercourse

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Policy E6 – permeable forecourts	The Council supports this policy, but it might be beneficial for the Plan/this policy to have a general presumption against paving over gardens / soft landscaping. Also note Local Plan policy LP 45, which resists the provision of front garden car parking.	Desirable: include a general presumption against paving over front gardens
Paragraph 8.9.3	Whilst we are in principle supportive of this, it should be acknowledged that the entire area has some susceptibility to Groundwater Flooding. This would need to be taken account of when designing permeable paving or other ‘soakaway’ solutions.	Essential: need to acknowledge that the entire area has some susceptibility to groundwater flooding and that this could impact on the design of permeable paving or soakaways
Section 9 – Opportunities for Change		
General	The Council suggests some re-wording of the policies to ensure they can be applied to developments/planning applications. At the moment, it is unclear who these policies are aimed at other than the Forum itself and local groups, as well as Richmond Council. For example, you could require any development within Ham Parade to consider measures to reduce parking, improve accessibility etc. Without focusing these policies on applicants/developers, they read more like an action plan, which could be a separate part of the NP (outside the ‘planning’ matters of the Plan).	Essential: consider re-wording of policies or otherwise move this section into the non-planning parts of the Plan
Sites 10-12	These do not have a plan and it would aid clarification to include maps for all sites.	Essential: include maps for all sites
9.2 Ham Parade	Paragraph 9.3.2 states “...it will be necessary to produce a long term plan for the Parade, which will identify land ownerships, identify constraints and opportunities, as well as possible sources of funding.” This is supported by the Council provided funding is available, given it is a small area and any Council funding should be commensurate.	Essential: recognise that this is subject to funding availability
9.4 St Richard’s Square	Policy 02 Subsection ii clarify the terminology whether it should refer to the “Parade” or “Square”. Paragraph 9.5.1: This states “it will be necessary to produce a long term plan...”. This is supported by the Council provided funding is available, given it is a small area and any Council funding should be commensurate. It would be useful to acknowledge that the servicing of the shops is a problem, particularly with Tesco.	Essential: clarify terminology Essential: recognise that this is subject to funding availability Desirable: acknowledge the issues of servicing of shops
9.6 Central Petersham	There is no formal Petersham Avenue, so it should be clarified what you mean in a different manner and perhaps refer to it informally as Petersham Avenue.	Essential: ensure there is clarity in the use of terminology

Section of Plan	Council comments	Changes required
9.8 Central Ham	<p>It is suggested that Map 14 is amended to show a boundary including school playing field and land at Woodville Centre to reflect the current Ham Close regeneration boundary.</p> <p>Paragraph 9.8.2 should include text to reflect the Ham Uplift programme and status of the ongoing public consultation and engagement on Ham Close regeneration. In addition, the sentence should be amended as follows “...‘provide new additional housing...”.</p> <p>Paragraph 9.8.6 should not specifically refer to ‘purpose-built accommodation for a Youth Centre and GP practice’. Whilst there will be a reprovision of community facilities, these will need to be fit-for-purpose and future proofed. Also note that the Council has no control over GP practices.</p> <p>Paragraph 9.9.1 should be amended as follows “Richmond Council as freeholder of the Youth Centre of land included in the redevelopment area (see Map 14) and in their diverse statutory roles.....”.</p> <p>Paragraph 9.9 iii – this requirement is too onerous. Whilst the Council will require all major developments to consider the impacts on existing social infrastructure provision, this does not automatically mean that new/additional community facilities are required on-site. Amend as follows: Any scheme for Ham Close which results in an increase of 10 or more residential units will be required to provide <u>assess the impacts on</u> community facilities in line with policy CF1 of the Neighbourhood Plan.</p> <p>Paragraph 9.9.2 – ‘Any redevelopment proposal will be expected to also be consistent with the Neighbourhood Plans housing policies’ – please note the comments provided above on the Housing policies of the Plan</p> <p>Paragraph 9.9.4 should be amended as follows “The Public Transport Accessibility Level (PTAL) will be a <i>one of the determining factors</i> in the density of housing that will be acceptable on this site.</p> <p>The Council is concerned that paragraph 9.9.5 in seeking replacement of existing community facilities is unduly prescriptive – the cluster (or dispersal) of facilities is dependent on the changing demographic of health/community needs and input from NHS Trust etc.</p>	Essential: include the changes as set out within the Council’s comments as required
9.12 Ashburnham Road / Ham Street/Wiggins Lane / Woodville Road	It is not clear at paragraphs 9.12.2 to 9.12.4 if any allowance has been made for the cost of any wider improvements outside the Ham Close boundary. This wording could place an unreasonable/unexpected financial burden on the viability of any development coming forward on Ham Close.	Essential: amend the wording to ensure it does not place an unreasonable financial burden on Ham Close

Section of Plan	Council comments	Changes required
9.13 Cassel Hospital	<p>The Council is concerned at paragraphs 9.13.2/9.14.3 as there is no identified need to provide (in particular privately owned) accommodation for older people. Other opportunities exist in the current proposal for St Michael's Convent and potential re-modelling/re-development of RHP's sheltered scheme at Redknapp House.</p> <p>At paragraph 9.14.1 criteria (v) delete the reference to sheltered housing, and amend to refer to affordable housing as included within mixed tenure housing.</p>	Essential: include the changes as required
9.15 St. Michael's Convent	The last paragraph should include mention of walled garden.	Essential: add reference to walled garden
Additional opportunity site	Area between Richmond Gate to Richmond Park and Star & Garter Home: There is funding for a scheme to improve the approach to Richmond Park/ better pedestrian/ less traffic dominated, improved paving to the front of the Star & Garter Home, improved setting to the Duchess of Teck fountain. The restoration of the fountain itself is a separate project for which a working group has been set up (local councillors and others).	Desirable: consider an additional opportunity site
9.17 Previously develop brownfield land and other small sites	The Council supports the approach to develop on previously developed land, but suggests the policy could be misinterpreted by applicants/developers, who may want to develop a vacant office / redundant shop into residential uses; careful consideration of what is previously developed brownfield land is therefore required so as not to allow under-utilised offices or shops to be redeveloped for residential uses, particularly if they are located in areas that the Plan seeks to protect, such as Ham Parade.	Essential: consider amending the wording and clarify what is previously developed brownfield land
Appendices		
Comments on the proposals for Character and Heritage:	<ul style="list-style-type: none"> • Reinforce clear distinction between built up areas and green spaces – should state this is an <i>ongoing</i> timescale. • Review of CA Appraisal and Management Plan – this is desirable but has resource implications. Although we note that the Implementation Programme is not part of the NP, the Council cannot commit to resources and a specific timescale. 	Essential: incorporate changes as required
Appendix 3: Travel and Streets	<p>None of the short term aspirations can be delivered in the short term which is defined as 'within a year of approval of the plan'. These should be changed to medium to long term or ongoing as there would be a lot of permissions and funding needed to undertake these.</p> <p>In particular in relation to the foot and cycle bridge between Ham and Twickenham, as set out above under Policy T2, at this stage no feasibility studies have been undertaken and there is no funding in place to look at options and feasibility, nor funding any build costs. It is therefore misleading to refer to it as 'short term'.</p>	Essential: change from 'short' to 'medium to long' term

Section of Plan	Council comments	Changes required
Comments on the proposals for Environmental sustainability	<p>All new hard standings...permeable materials add ...<i>or sustainable drainage arrangements</i> or similar. There may be occasions where there is a good case of the use of traditional materials, which may be laid to drain to soft ground.</p> <p>The proposals for improvements at Star & Garter Home/ Richmond Gate should be added – see notes under Section 9 above.</p> <p>Another possible addition is the extension of improvements already made in Riverside Drive in a northerly direction – footway surfacing, lighting (if appropriate) etc.</p>	Desirable: consider suggested changes/additions
Appendix 3: Character and Heritage	It is noted that you refer to the need to update the Ham and Petersham Conservation Areas' Appraisal and Management Plan. See comments below under Appendix 4	See below
Appendix 4: Character Area Studies		
Appendix 4 – general	<p>Overall, we welcome the inclusion of the Character Area Studies for areas not designated as Conservation Areas. It is noted that elsewhere in the Plan you refer to the need to update the various Conservation Area Appraisals/Studies and Management Plans.</p> <p>As you will be aware, the Council has been preparing Village Planning Guidance SPDs for all parts of the borough, except for the Ham and Petersham Neighbourhood Area. The Village Planning Guidance SPDs identify the key features and characteristics of the village areas, including the most important aspects and features that contribute to local character and that are valued by local communities. These SPDs are the main starting point for design guidance to those seeking to make changes to their properties or who wish to develop in the area.</p> <p>As the Council will not be developing such a SPD for Ham and Petersham due to a Neighbourhood Plan being prepared for this area, it would be very welcome if the Neighbourhood Plan could provide some guidance on design and character for the Conservation Areas of Ham and Petersham as well. You could use the existing CA Appraisals/Studies/Management Plans as a starting point.</p>	Desirable: consider expanding the Neighbourhood Plan to provide more guidance on character and heritage within the Conservation Areas of Ham and Petersham.
Ham Lands area	Not covered under Character Area Studies but under Green Spaces. Not much detail there however it is well protected by existing policies.	Desirable: consider additional information
Area 1	Cedar Heights/ Bute Avenue: it would be worth mentioning the striking converted church; dividing land into smaller plots could affect the character relating to the green garden setting and openness.	Desirable: consider suggested additions
Area 2	Buckingham Road: guidance – could add something along the lines of ...aiming to maintain the balance of green space to buildings...as the green verges and greens are a distinctive positive element in this area.	Desirable: consider suggested additions

Section of Plan	Council comments	Changes required
Area 3	Sandy Lane/ Martingales/ Sudbrook: Sandy Lane, 2 nd para – could add after substantial hedges, <i>tree planting and grass verges</i> ...as it all contributes to the special feel of the area. It is important not to fill up gaps between buildings with views to landscape beyond, where they exist. Division into smaller plots would affect the special character, green setting and space around buildings. Sudbrook Gardens: front boundary walls are particularly important to the character. Comments also as for Bute Avenue.	Desirable: consider suggested additions
Area 6	<p>Ham Close:</p> <ul style="list-style-type: none"> • Page 112: It states that ‘most of the flats house families’ but this isn’t correct as the majority of the properties are studios and one bedroom flats (56%) and, whilst there is an element of over-occupancy, there is also some under-occupancy, particularly by residents who have lived there since the original scheme’s construction. There are also many single households. Therefore, this section should be amended to accurately reflect the existing situation. • Page 114: How is the area changing? The Council is aware that RHP is still receiving preserved ‘Right to Buy’ applications. Therefore, the reference to the fact that Ham Close redevelopment proposals have halted the ‘Right to Buy’ trend should be removed. • Page 114: The September 2016 consultation referenced took place over September and October 2016. It would be useful here to reference the outcome of this which differed from the 400 unit scheme from 2015 which met such opposition – the autumn 2016 scheme of 425 units was received much more positively as it addressed many of the previous concerns with regard to site boundary (e.g. excluding the village green and the library), open layout with green link and location of taller buildings towards the middle of the site. 	<p>Essential: incorporate the changes required for the section on page 112</p> <p>Essential: incorporate the changes required in relation to Right to Buy</p> <p>Essential: incorporate the changes required in relation to the public consultation on Ham Close, or remove this statement in its entirety</p>
Area 7	Wates Estate – It is probably worth mentioning, perhaps under the last para on Guidance, that the open spaces between Riverside Drive and the Wates Estate buildings are designated as OOLTI (Other Open Land of Townscape Importance,) emphasising the importance to the character of the area.	Desirable: consider suggested additions
Area 10	Dukes Avenue: considerable width of verge + carriageway – looks rather barren in places – additional tree planting would be very welcome.	Desirable: consider suggested additions