

Ham and Petersham Neighbourhood Plan 2018 - 2033

London Borough of Richmond upon Thames

Decision Statement

1. Summary

- 1.1 Following receipt of the Examiner's Report, Richmond Council consider that the Ham and Petersham Neighbourhood Plan, as amended by the modifications set out in Tables 1 and 2 of this Decision Statement, meets the basic conditions and other relevant legal requirements, and as such should proceed to referendum.
- 1.2 In accordance with the recommendation made in the Examiner's Report, the referendum area for the Ham and Petersham Neighbourhood Plan (as amended) should be the designated Neighbourhood Area as depicted on Map 1.
- 1.3 This Decision Statement, the Examiner's Report, the proposed amendments to the Ham and Petersham Neighbourhood Plan ('Tracked Changes version'), as well as other relevant documents, can be viewed online on the Council's website, as follows:
http://www.richmond.gov.uk/services/planning/planning_policy/local_plan/neighbourhood_plans/ham_and_petersham_neighbourhood_planning
- 1.4 Hard copies of the above documents can also be viewed at the Twickenham Civic Centre, 44 York Street, Twickenham, TW1 3BZ (opening hours: Monday to Thursday, 9:00 AM to 5:15 PM; and Friday, 9:00 AM to 5:00 PM) and Ham Library, Ham Street, TW10 7HR (opening hours: Monday, Tuesday and Friday, 9:30 AM to 6:00 PM; Wednesday 10:00 AM to 7:00 PM; and Saturday 9:30 AM to 4:00 PM).
- 1.5 If the Plan receives a majority vote in favour at referendum, then the document becomes part of the borough's statutory development plan, and will be used alongside the Council's other planning documents to determine planning applications within the designated Ham and Petersham Neighbourhood Area.

2. Background

- 2.1 On 16 January 2014, the Ham and Petersham Neighbourhood Forum was approved as the qualifying body for the area and the boundary of the Neighbourhood Plan Area was designated by the Council, in accordance with Section 61G of the Town & Country Planning Act 1990. The Neighbourhood Area is shown on Map 1.
- 2.2 The Forum held a public consultation on a draft version of the Neighbourhood Plan from 30 January to 10 March 2017, in accordance with Regulation 14 of the Neighbourhood Planning (General) Regulations 2012 (as amended).
- 2.3 The Forum submitted their draft Neighbourhood Plan to the Council on 14 September 2017. The Council held a public consultation on the draft Plan from 6 December

2017 to 26 January 2018, in accordance with Regulation 16 of the Neighbourhood Planning (General) Regulations 2012 (as amended).

- 2.4 The Forum and the Council jointly appointed Mr John Slater (Hons) DMS MRTPI to conduct an examination into the draft Neighbourhood Plan to assess whether the Plan meets the required basic conditions and other legal requirements, and whether it should therefore proceed to referendum.
- 2.5 The Examiner submitted his report to the Forum and the Council on 12 July 2018. His conclusion is that the Plan, if amended in line with his recommendations, meets all the statutory requirements including the basic conditions test and that it should therefore proceed to referendum.

3. Decision

- 3.1 Following receipt of the Examiner's Report, the local planning authority is required by the Neighbourhood Planning (General) Regulations 2012 (as amended) to outline how it intends to respond to each of the recommendations made by the Examiner.
- 3.2 The Examiner's recommendations are set out in Table 1, alongside the modifications that the Council propose to make in response and the reasoning for this decision. These amendments are considered to be necessary to ensure that the draft Plan meets the basic conditions and other legal requirements.
- 3.3 The modifications set out in Table 2 are for the purposes of correcting errors, amending the layout of the Plan and making other non-material changes which are consequential to the Examiner's recommendations.
- 3.4 These modifications have been shared with representatives of the Forum, who are in agreement with the modifications as they are proposed in Tables 1 and 2.
- 3.5 The Council is satisfied that, with the modifications proposed by the Examiner and set out in Tables 1 and 2, the Ham and Petersham Neighbourhood Plan meets the basic conditions, is compatible with the European Convention on Human Rights, complies with the statutory definition of a neighbourhood development plan and comprises provisions that can be made by such a document.
- 3.6 Given the above, the amended Plan should therefore proceed to a referendum, for which the question will be:

"Do you want the London Borough of Richmond upon Thames to use the neighbourhood plan for Ham and Petersham to help it decide planning applications in the neighbourhood area?"
- 3.7 In accordance with the Examiner's recommendation, the referendum area for the Ham and Petersham Neighbourhood Plan (as amended) should be the designated Neighbourhood Area (see Map 1).
- 3.8 If the Plan receives a majority 'yes' vote at the referendum, then the document becomes part of the borough's statutory development plan, and will be used

alongside the Council's other planning documents to determine planning applications within the designated Ham and Petersham Neighbourhood Area.

Adam Hutchings

Policy and Design Team Manager (Interim)

Councillor Martin Elengorn

Cabinet Member for the Environment, Planning and Sustainability

Date: 3 September 2018

Table 1. Examiner’s recommendations and the London Borough of Richmond upon Thames’ response

Ref #	Draft Ham & Petersham Neighbourhood Plan Policy	Examiner’s Report page #	Examiner’s recommended modification(s) and supplementary text	Council’s response and reasoning <i>Where applicable:</i> New text shown as underlined Deletions shown as strikethrough
1	General	5	That the title of the Plan should read Ham and Petersham Neighbourhood Plan 2018-2033. [See Addendum to the Examiner’s Report]	Agree to modification. A neighbourhood plan must set out the period for which it is to have effect (Section 28B(1)(a) of the Planning and Compulsory Purchase Act 2004).
2	General	10	<p>All policies within the plan be clearly differentiated from the supporting text and not sequentially numbered with other paragraphs.</p> <p><i>Examiner’s advice:</i></p> <p>I have a strong recommendation that all the policies should be clearly identified whether within a policy box or emboldened, in some way so there is no chance of misinterpreting what constitutes the policy. Some neighbourhood plans will put the planning policy in a particular coloured box and community aspirations in another colour. Again, I will leave that to the relevant parties to resolve, but the status of the policy within the Plan does need to be highlighted.</p>	<p>Agree to modification. It is important that policies for the use and development of land are clearly identifiable within the Neighbourhood Plan.</p> <p>Paragraph numbers attached to policies have been removed. Where a policy included more than one distinct paragraph, these are to be identified as A, B, C, etc, to ensure each part is separately identifiable. The paragraph numbers within the Plan have been amended accordingly to reflect this change.</p> <p>Development management policies are to be identified within a light red box. Supporting text clarifying this has been added after the first sentence in paragraph 1.4.1 in the ‘How to use the Neighbourhood Plan’ section, as follows:</p> <p>“Policies are clearly identified within the Plan by a</p>

				<p>light red box, and each policy has a distinct title and policy number.”</p> <p>In several instances, the Examiner has recommended that certain policies are instead to be identified as community aspirations. Where such community aspirations are included within the Neighbourhood Plan, these are referred to as ‘Community Proposals’ and are identified by a light green box. Supporting text clarifying the role of ‘community proposals’ is added after the first sentence in paragraph 1.4.5, as follows:</p> <p>“The Planning Practice Guidance is clear that such community aspirations can be included within neighbourhood plans, but that they should be clearly distinguished from the plan’s policies. As such, these are referred to in the text of the Plan as ‘Community Proposals’ and are clearly identified within a light green box.”</p> <p>Please see the ‘Tracked Changes’ version of the Ham and Petersham Neighbourhood Plan (Appendix A) for the full list of changes in response to this modification.</p> <p>These changes are considered to be consistent with the Examiner’s recommendation and provide the necessary clarity as to what constitutes a development plan policy, and what is supporting text, and what is a community aspiration.</p>
3	Policy C1 – Protecting Green Character	11	Delete the second sentence in para 2.3.1	Agree to modification. This represents the duplication of requirements that are more appropriately set out under Policy G2 Light

			<p>At the start of the sentence in para 2.3.2 insert “In as much as any works require planning consent...”</p> <p>At the start of the sentence in para 2.3.3 insert “In as much as any works require planning consent...”</p>	<p>Pollution. It is considered that such duplication could cause confusion, and that as such this requirement should be removed from Policy C1 – Protecting Green Character.</p> <p>Agree to modifications. These clarify how the policy should be applied, particularly as many of the items highlighted in paragraph 2.3.3 would not necessarily be subject to planning control.</p>
4	Policy C2 – Character and Context Appraisal	11	In para 2.4.1 delete “be accompanied by a Character and Context appraisal which” and replace with “demonstrate how the proposal”	Agree to modification. The LBRuT Local Validation Checklist (updated October 2017) specifies that a Design and Access Statement is only required for major development, or the development within conservation areas of at least a single dwellinghouse or buildings with a floorspace of over 100 m ² . The modification removes the requirement to submit a specific document, but retains the intent.
5	Policy C3 – Protecting the Character of Built Areas	12	“In para 2.5.1 in the first sentence after “should” insert “where it is both possible and practical for the scheme to” before “retain”.	Agree to modification. This clarifies how the policy should be applied.
6	Policy H1 – Residential Development	12	<p>In para 3.3.1 insert “build” after “new”</p> <p>At the end of the policy insert “and other small sites which meet the criteria set out in Policy LP 39 of the Local Plan”.</p>	<p>Agree to modification. This clarifies the remit of the policy.</p> <p>Agree to modification. This ensures consistency with Policy O7 – Previously Developed Brownfield Land and Other Small Sites, and that the policy does not promote less development than is set out in the Local Plan by referring to ‘other small sites’.</p>

			Replace the wording of para 3.3.2 to relate to all residential development.	Agree to proposed modification. In paragraph 3.3.2, propose deleting the text “Major residential development comprises any schemes delivering 50 or more new residential units. Higher density residential development means any residential scheme comprising 200 habitable rooms per hectare (hrh) or more”, and replacing this with “This policy applies to all new build housing”. This ensures the supporting text is consistent with the policy wording, and removes unrelated text.
7	Policy H2 – Housing Mix	13	That the policy be deleted.	Agree to modification. This policy repeats the requirements of Local Plan Policy LP 35 – Housing Mix and Standards. This policy already applies to the Ham and Petersham area, and as such there is no additional benefit to duplicating the policy in the Neighbourhood Plan.
8	Policy H3 – Affordable Housing	13	That the policy be deleted.	Agree to modification. This policy repeats the requirements of Local Plan Policy LP 36 – Affordable Housing. This policy already applies to the Ham and Petersham area, and as such there is no additional benefit to duplicating the policy in the Neighbourhood Plan.
9	Policy H4 – Housing Standards	13	That the policy be deleted.	Agree to modification. The criteria outlined within this policy are required by Local Plan Policy LP 35 – Housing Mix and Standards. As Policy H4 – Housing Standards only encourages compliance, to ensure that the Neighbourhood Plan offers certainty to applicants this policy should be removed. This is considered in line with paragraph 17 of the NPPF.

10	Policy H5 – Design Principles for Housing Development	14	In Principle 2. replace the second sentence with “Developments over 4 storeys will be considered acceptable if the proposal demonstrates positive benefits in terms of townscape and local aesthetic quality and relate well to their context.”	Agree to modification. There is not sufficient justification for establishing a maximum height in policy terms. The modification changes the policy such that it becomes a positive statement that is consistent with the principle of sustainable development outlined in the NPPF.
11	Policy T1 – Travel Plans	14	Delete the first two sentences in 1. and insert “Demonstrate how the proposals will mitigate the transport impacts of the development to take account of the generally low PTAL values in the area including where necessary a Travel Plan. Any transport assessment and travel plan should be produced in accordance with TfL best practice.” Delete the second requirement.	Agree to modification. The LBRuT Local Validation Checklist (updated October 2017) specifies whether or not a Travel Plan and/or assessment is required. The modification removes the requirement to submit a specific document, but retains the intent. Agree to modification. This ensures general conformity with the London Plan, which sets out standards for overall car parking provision that is appropriate to accommodate the requirements of development, including car club vehicles.
12	Policy T2 – Improvements to Transport Infrastructure	15	Delete the policy and replace as a community aspiration.	Agree to modification. This is not a policy for the use and development of land. The PPG advises that expressions of priority such as this should be considered as community aspirations rather than as planning policy. For clarity, and to distinguish these from policies, this should be referred to as “Community Proposal 1” and reference to the “Policy Application” and “Reasoned Justification” should be removed. Subsequent community aspirations should take a similar format.

13	Policy CF1 – Impact of Development	15	That the policy be deleted.	Agree to modification. The requirements outlined within this policy are already covered by Policy T1 – Travel Plans, Local Plan Policy LP 28 – Social and Community Infrastructure, and Local Plan Policy LP 23 – Water Resources and Infrastructure. These policies already apply to the Ham and Petersham area, and as such there is no additional benefit to including the policy in the Neighbourhood Plan.
14	Policy R1 – Enhancing Retail Uses	16	In the second sentence of para 6.3.1, delete “for the local community”. Delete all text after “demonstrated” and replace with “that the site has been actively and properly marketed for its current use in accordance with the requirements set out in Appendix 5 of the adopted Local Plan”.	Agree to modification. The benefit provided by these extends beyond the local community and planning cannot differentiate the type of user, and as such the inclusion of this text is redundant. Agree to modification. This clarifies how this policy should be applied, provides certainty to applicants, and ensures that it is consistent with the requirements of the Local Plan regarding the loss of these services.
15	Policy R2 – Other Businesses and Local Services	17	Move the first sentence of para 6.8.1 to Reasoned Justification. <i>Examiner’s advice:</i> I believe there is an error in the relevant Telecommunication policy referred to in the Local Plan which should be 8.6 and not 8.1. In the second sentence, insert “other relevant” before “planning policies”	Agree to modification. This sentence does not provide guidance as to how planning applications should be dealt with. It is proposed to move this to the reasoned justification. As per the Examiner’s recommendation, the reference to the relevant section within the Local Plan has been corrected. This now refers to 8.6 rather than 8.1. Agree to modification. This clarifies how the policy should be applied.

16	Policy G1 – Open Spaces	17	<p>In para 7.3.1 after “spaces” insert “as shown on Figure 7.1”.</p> <p>Delete “and through site specific management plans” and move to supporting text.</p>	<p>Agree to modification. This clarifies how the policy should be applied.</p> <p>Agree to modification. This criterion is not for the use and development of land. The PPG advises that wider community aspirations such as this can be included within neighbourhood plans, but that these should be clearly identified as not being land use matters.</p> <p>It is proposed that the first sentence paragraph 7.3.2 is amended to read: “This policy applies to the open spaces as shown on Figure 7.1 and the River Thames corridor.” Specific references to “Ham Common, Ham Common Woods, Ham Village Green, the Avenues, Petersham Common, Petersham Copse, Petersham Lodge Woods, Petersham Meadows” should be deleted in accordance with the Examiner’s recommendation.</p> <p>The second sentence of paragraph 7.3.2 should be moved to the Reasoned Justification to form a new paragraph that sits before 7.3.3, and amended as follows:</p> <p>“These large, publicly owned open/green spaces are considered fundamental to the character and setting of Ham and Petersham. Their conservation and improvement in accordance with the policies of the Neighbourhood Plan will should, where they are publicly owned, be facilitated through the preparation and regular review and implementation of management plans with local community involvement.”</p>
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17	Policy E1 – Sustainable Development	18	Delete the first sentence of 8.3.1 and “in addition” in the second sentence.	Agree to modification. The first sentence of this policy repeats the requirements of Local Plan Policy LP 22 – Sustainable Design and Construction. This policy already applies to the Ham and Petersham area, and as such there is no additional benefit to duplicating the requirements in the Neighbourhood Plan.
18	Policy E2 – Retrofitting Existing Housing and Residential Extensions	19	Insert “on residential properties” after “measures” in para 8.4.1	Agree to modification. This clarifies how the policy should be applied.
19	Policy E3 – Electric Charging Points	19	That the policy be deleted.	<p>Agree to modification. This policy repeats the requirements of Local Plan Policy LP 45 – Parking Standards and Servicing and London Plan Policy 6.13. These policies already apply to the Ham and Petersham area, and as such there is no additional benefit to duplicating the policy in the Neighbourhood Plan.</p> <p>It is proposed that a new paragraph is added within the Context, following paragraph 8.2.3, which states:</p> <p><u>“The Neighbourhood Forum supports LBRuT’s approach to electric charging points as set out in policy LP 45 of the Richmond Local Plan.”</u></p>
20	Policy E6 – Permeable Forecourts	20	In para 8.9.1 replace “in accordance with” by “except in the circumstances set out in”	Agree to modification. This clarifies the application of Local Plan Policy LP 45 – Parking Standards and Servicing in relation to Policy E6 – Permeable Forecourts.

21	Policy O1 – Improving Ham Parade	20	<p>In para 9.3.1 replace “These are either:” by “Any planning application proposing the alterations to the external areas to Ham Parade will be supported if the proposal involves:”</p> <p>Delete 4. and move to a community aspiration.</p>	<p>Agree to modification. The policy is drafted such that it could not be applied to the determination of a planning application. The modification amends the policy wording such that, should a planning application be required for the works set out, then the policy now offers support.</p> <p>Agree to modification. This criterion does not relate to the use and development of land. The PPG advises that wider community aspirations such as this can be included within neighbourhood plans, but that these should be clearly identified as being separate from policy.</p> <p>It is proposed that criterion 4 is deleted and moved to become a community proposal that follows paragraph 9.3.3 (in the draft Neighbourhood Plan, submission version), stating:</p> <p>“Community Proposal 2 – Ham Parade</p> <p>To improve Ham Parade by encouraging owners and occupiers of property to improve backland and service areas to the Parade through proper maintenance.”</p>
22	Policy O2 – Improving St Richard’s Square	21	<p>In 9.5 replace “To improve St Richard’s Square by:” with “Any planning application proposing the alterations to the external areas to St Richard’s Square will be supported if the proposal involves:”</p> <p>Delete d and ii and move to a community aspiration.</p>	<p>Agree to modification. This policy is drafted such that it could not be applied to the determination of a planning application. The modification amends the policy wording such that, should a planning application be required for the works set out, then the policy now offers support.</p> <p>Agree to modification. These criteria do not relate to the use and development of land. The PPG</p>

				<p>advises that wider community aspirations such as these can be included within neighbourhood plans, but that these should be clearly identified as being separate from policy.</p> <p>It is proposed that criteria i(d) and ii are deleted and moved to become a community proposal that follows paragraph 9.5.2 (in the draft Neighbourhood Plan), stating:</p> <p>“Community Proposal 3 – St. Richard’s Square</p> <p>To improve St. Richard’s Square by:</p> <ol style="list-style-type: none"> 1. reducing the dominance of traffic in Ashburnham Road and Croftway in favour of pedestrians and cyclists through the introduction of traffic calming measures; 2. encouraging owners and occupiers of property to improve backland and service areas to the parade through proper maintenance.”
23	Policy O3 – Central Petersham	21	That the policy be deleted and moved to be a community aspiration.	<p>Agree to modification. This is not a policy for the use and development of land. The PPG advises that expressions of priority such as this should be considered as community aspirations rather than as planning policy.</p> <p>To ensure consistency with the other community aspiration titles and formatting, it is proposed this is amended as follows:</p> <p>“Policy Community Proposal 4 O3 – To enhance and improve the quality and safety of Central</p>

				<p>Petersham by:</p> <p>To enhance and improve the quality and safety of Central Petersham by:</p>
24	Policy O4a – Ham Close	21	Delete criterion iii.	Agree to modification. It is implicit that a proposal will have regard to other relevant development plan proposals, including those in the Local Plan. The requirements set out in criterion iii no longer apply in line with modification #13 relating to Policy CF1 – Impact of Development.
25	Policy O4b – Ham Street / Ashburnham Road	21	<p>Replace the existing policy with “Applications for the installation of new shopfronts and appropriate new external signage will be supported.”</p> <p>Move the encouragement for the redecoration of upper storeys to be a community aspiration.</p>	<p>Agree to modification. This policy is drafted such that it could not be applied to the determination of a planning application. The modification amends the policy wording such that, should a planning application be required for the works set out, then the policy now offers support.</p> <p>Agree to modification. This part of the policy is drafted such that it does not relate to the use and development of land. The PPG advises that wider community aspirations such as this can be included within neighbourhood plans, but that these should be clearly identified as being separate from policy.</p> <p>It is proposed that this sentence is deleted and that a new paragraph is added after 9.10.2 (in the draft Neighbourhood Plan, submission version), stating:</p> <p>“Owners and occupiers of property in Ham Street / Ashburnham Road are encouraged to support the aspirations of this policy by redecorating the upper storeys of shops and flats.”</p>

			<p><i>Examiner's advice:</i></p> <p>It would also assist if there was a specific map that identified the extent of the shopping precinct.</p>	<p>Agree to recommendation. This clarifies how the policy should be applied. The extent of the shopping precinct will be identified on Figure 9.4.</p>
26	Policy O4c – Ham Village Green	22	Delete as a policy and move to a community aspiration.	<p>Agree to modification. The policy is drafted such that it could not be applied to the determination of a planning application. The PPG advises that wider community aspirations such as this can be included within neighbourhood plans, but that these should be clearly identified as being separate from policy.</p>
27	Policy O4d – Ashburnham Road / Ham Street / Wiggins Lane / Woodville Road	22	Delete as a policy and move to a community aspiration.	<p>Agree to modification. The policy is drafted such that it could not be applied to the determination of a planning application. The PPG advises that wider community aspirations such as this can be included within neighbourhood plans, but that these should be clearly identified as being separate from policy.</p>
28	Policy O6 – St Michael's Convent	23	<p>Insert at the end of iii “unless it is demonstrated that the new access complies with highway safety standards and it is demonstrated that the works associated with it or traffic associated with any new access will not have a material detrimental effect on the character and the amenity of Martingales Close and its residents”.</p> <p>In iv insert “seek to” before “secure”.</p>	<p>Agree to modification. This introduces flexibility to ensure that the policy is effective in its implementation, and is consistent with the principle of sustainable development outlined in the NPPF.</p> <p>Agree to modification. This criterion is not something that can be required through a planning application. The modification corrects this, while retaining the policy's intent.</p>

29	Policy O7 – Previously Developed Brownfield Land and Other Small Sites	23	Replace the policy with “Planning applications for the residential development of previously developed brownfield land will be supported. Proposals that involve the development of open or backland spaces that contribute to the character of the locality will not normally be approved.”	Agree to modification. This policy is drafted such that it could not be applied to the determination of a planning application. The modification amends the policy wording such that, should a planning application be required for the works set out, then the policy now offers guidance on whether it would be acceptable or not. For clarity in implementation, and to ensure consistency with modification #2, this policy has been divided into two components, A and B.
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Table 2: Other amendments to make non-material changes as a result of the Examiner’s recommendations and to correct factual errors and formatting/layout

In his Report, the Examiner states that “there also need to be adjustments made to the supporting text of the policies where I have made recommendations, which are matters beyond my remit as an examiner, but it is important that the final neighbourhood plan reads as a coherent planning document”. These modifications are reflected below, as well as modifications to correct factual errors and standardise the formatting within the draft Neighbourhood Plan.

A number of minor typographical errors (e.g. misspelt words; erroneous use of capitalisation; etc) are not recorded in the table below, however these are recorded in the Ham and Petersham Neighbourhood Plan – Tracked Changes Version (September 2018) for reference (see Appendix A).

Ref #	Draft Ham & Petersham Neighbourhood Plan Section or Policy	Relevant page number and paragraph (Submission Version)	Proposed change <i>Where applicable:</i> New text shown as <u>underlined</u> Deletions shown as strikethrough	Council’s reasoning
30	Title Page	p 1	Amend the text beneath the title as follows: “ Submission Version September 2017 8 ”	To update the Neighbourhood Plan from the Submission version.
31	Contents	p 5-7	The contents pages have been updated to reflect changes to policies (e.g. where the Examiner recommended that these were removed), as well as to reflect changes to page numbers.	To reflect changes based on the Examiner’s recommendations.
32	Objectives	p. 12 para 1.1.3	Amend the first sentence to read: “Objectives – the objectives set out how the Neighbourhood Plan seeks to achieve this vision and how key issues should be addressed, <u>alongside the Richmond Local</u>	To reflect changes based on the Examiner’s recommendations. A number of policies have been recommended for deletion as they repeat the requirements outlined within the Local Plan, however the topics to which they refer are included in the Forum’s stated objectives. For example,

			Plan objectives.”	while Policy H3 – Affordable Housing has been recommended to be deleted (see #8), the text “Opportunities will be optimised for affordable housing” is included in paragraph 1.1.5 concerning the ‘Housing’ objectives. It is recognised that the Forum still support such aspirations, and so this modification is proposed to enable such connect the aspiration to the relevant policy support.
33	How to use the Neighbourhood Plan	p 13 para 1.2.1	Amend the text within the paragraph as follows: “References to the ‘Richmond Local Plan’ in the Neighbourhood Plan are to the Richmond Local Plan <u>as adopted by Richmond Council on 3 July 2018</u> Submission Version 2017. ”	To update the Neighbourhood Plan to accord for the adoption of the Richmond Local Plan on 3 July 2018.
34	How to use the Neighbourhood Plan	p 13 para 1.4.2	Amend the text within the paragraph as follows: Richmond Council are currently reviewing the Local Plan and consulted on the ‘Publication Version’ between 4th January and 15th February 2017 and have submitted the draft Local Plan to the Secretary of State for approval. The Council have adopted the Publication Local Plan for determining planning applications and development management purposes and this version has been used as the relevant Local Plan in the preparation of the draft <u>The Neighbourhood Plan has been prepared in conjunction with the development of the Richmond Local Plan.</u>	To update the Neighbourhood Plan to accord for the adoption of the Richmond Local Plan on 3 July 2018.

35	Policy C2 – Character and Context Appraisals	p 25 para 2.4.2	Amend the reference in paragraph 2.4.2 from LP 1 to LP 3.	To ensure that Policy C2 refers to the correct Local Plan policy.
36	Policy C2 – Character and Context Appraisals	p 25 para 2.4.3	<p>Amend the text within the Policy Application section as follows:</p> <p>“The character area studies in Appendix 4 and Conservation Area appraisals will provide the particular context for assessing proposals. Where appropriate, reference to how a proposal addresses the character of an area will normally the Character and Context appraisal may be integrated into the Heritage Statement and the Design and Access Statement. Such Character and Context Appraisals should be appropriate to the size and complexity of the proposed development.”</p>	To ensure the supporting text accords with the modification recommended by the Examiner (see #4).
37	Policy C2 – Character and Context Appraisals	p 25 para 2.4.4	<p>Amend the text within the Reasoned Justification section as follows:</p> <p>“It is considered appropriate to expect all applications for new buildings in Ham and Petersham to demonstrate how the proposal be accompanied by a Character and Context Appraisal in line with the London Mayor’s SPG ‘Shaping Neighbourhoods: Character and Context’. This appraisal will need to address es the special character of the area in which the development is proposed, in line with the London Mayor’s SPG ‘Shaping Neighbourhoods: Character and Context’, whether designated as a</p>	To ensure the supporting text accords with the modification recommended by the Examiner (see #4).

			Conservation Area or neighbourhood character area.”	
38	Policy C3 – Protecting the Character of Built Areas	p 25 para 2.5.2	Amend the text within the Policy Application section as follows: “Development should where it is both possible and practical retain existing paths and routes, and, where appropriate, add to this network”	To ensure the supporting text accords with the modification recommended by the Examiner (see #5).
39	Figure 2.1 – Conservation Areas and Listed Buildings	p 26	The Conservation areas should be clearly identified, with this GIS layer sitting ‘above’ the open/green space layer.	To ensure the map is clearly legible.
40	Figure 2.2 – Character Areas	p 27	The GIS layer for the Locksmeade Character Area should sit ‘above’ that for the Thames Policy Area.	To ensure the map is clearly legible.
41	Figure 2.3 – Archaeological Priority Areas	p 28	The APAs should be labelled. A minor cartographical error in the boundary of the APA c. 200m north of Meadland Drive should be corrected.	To ensure the map is clearly legible, and includes the relevant information.
42	Policy H5 – Design Principles for Housing Development	p 34	Renummer policy from H5 to H2. Capitalise policy name for formatting consistency.	To account for deleted policies as per the above modifications.
43	Policy H5 – Design Principles for Housing Development	p 34 para 3.7.1	Amend sentence in paragraph 3.7.1 as follows: “The height, scale, massing and site layout of new housing development will be based on	To provide clarity in the implantation of the policy.

			the immediate context and surrounding housing identified in the Character and Context Appraisals in Appendix 4. "	
44	Policy H5 – Design Principles for Housing Development	p 34 para 3.7.1	Amend sentence in paragraph 3.7.2 as follows: "The design of all new housing development in the neighbourhood area will be guided by policy C2 Character and Context Appraisals. Protecting the Character of Built Areas. In particular housing schemes should incorporate the following principles:"	To correct a typographical error.
45	Policy T1 – Travel Plans	p. 39	Rename Policy T1 from "Travel Plans" to "Assessment of Transport Impact"	In accordance with the modification recommended by the Examiner (see #11), it is considered that this policy title more accurately reflects the content of the policy.
46	Policy T1 – Travel Plans	p 39 para 4.3.3	Amend sentence in paragraph 4.3.3 of the Reasoned Justification as follows: "Major developments will be expected to be accompanied by a Transport Assessment or and, where necessary, a Travel Plan identifying and setting out how the transport requirements generated by the development will be addressed in a sustainable way."	To ensure the supporting text accords with the modification recommended by the Examiner (see #11). It also ensures that Policy T1 is consistent with the requirements set out in the Local Plan, in particular paragraph 11.1.10, which stipulates that "All planning applications for major developments must be accompanied by a Transport Assessment or for minor developments a Transport Statement. This may include Travel Plans, Delivery and Servicing Plans and Construction and Logistic Plans."
47	Policy T1 – Travel Plans	p 39 para 4.3.6	Delete sentence in paragraph 4.3.6 of the Reasoned Justification.	To ensure the supporting text accords with the modification recommended by the Examiner (see #11).

48	Policy T2 – Improvements to Transport Infrastructure	p 40 paras 4.4.1 & 4.4.2	Reorder policies such that the text of paragraph 4.4.2 reads before that of paragraph 4.4.1.	In accordance with the modification recommended by the Examiner (see #12), it is considered that these read more logically in the proposed order.
49	Policy T3 – Motor Vehicle and Cycle Storage	p 40	Re-number policy from T3 to T2. Format policy name in lower case for consistency.	To account for deleted policies as per the above modifications.
50	Policy T3 – Motor Vehicle and Cycle Storage	p 40 para 4.5.5	Amend the last sentence of paragraph 4.5.5 in the Reasoned Justification as follows: “This policy builds on Policy LP 44 of the Richmond LBRuT Local Plan Publication Version December 2016 and the London Plan cycle parking standards.”	To ensure correct reference to the Richmond Local Plan, in a format consistent with the rest of the Neighbourhood Plan.
51	Figure 4.4 – Walk London Network – Capital Ring and Thames Path	p 45	In the key, the blue line should be listed as the ‘Thames Path’, rather than the ‘Capital Ring’.	To correct a typographical error.
52	Policy CF2 – Community Facilities	p 49	Re-number policy from CF2 to CF1. Format policy name in lower case for consistency.	To account for deleted policies as per the above modifications.
53	Figure 5.1 – Community Facilities	p 50	The scale bar should be clearly displayed. St Richard’s Church of England Church is only identified as a ‘School/Nurseries (children)’. It should also be listed as a ‘Church’.	To ensure map is clearly legible, and to correct a factual error.
54	Retail and Local Services	p. 53 para 6.2.4	Amend the first sentence as follows: “The retail frontages at Ham Parade, Ashburnham Road by St Richard’s Church (St	To update the Neighbourhood Plan to accord for the adoption of the Richmond Local Plan on 3 July 2018.

			Richard's Square) and Ashburnham Road / Ham Street are all designated Key Shopping Frontages in the LBRuT Local Plan Proposals Policies Map adopted July 2018 ⁵ .”	
55	Policy G3 – Allotment Extension and Community Orchard	p. 61 para 7.5.3	Amend the second sentence of paragraph 7.5.3 in the Reasoned Justification as follows: “Opportunities to extend the allotments in response to demand should be explored and identified if feasible in this Plan , as well as any community gardening opportunities which may arise.”	To correct a typographical error.
56	Figure 7.1 – Green Spaces	p 63	Several of the public and private spaces included in the key are not identified on the map with a number. These include: 5, 6, 7, 8, 9, 10, 12, 13 and 14. These should be added.	To ensure the map is clearly legible.
57	Policy E4 – Water Efficiency	p 66	Renumber policy from E4 to E3.	To account for deleted policies as per the above modifications.
58	Policy E4 – Water Efficiency	p 66 para 8.6.3	Amend the last sentence of paragraph 8.6.3 in the Reasoned Justification as follows: “This approach endorses the Richmond Local Plan strategic objective for a sustainable future and their new policy ; LP 22 Sustainable Design and Construction .”	To clarify reference to the adopted Richmond Local Plan, in a format consistent with the rest of the Neighbourhood Plan.
59	8.7 Managing flood risk	p 67 para 8.7.3	Amend the first sentence of paragraph 8.7.3 as follows:	To update the Neighbourhood Plan to accord for the adoption of the Richmond Local Plan on 3 July

			<p>“LBRuT's Development Management Plan Policy SD6 LP 21 in the Richmond Local Plan is a good general policy covering flood risk.”</p>	<p>2018, which superseded the Development Management Plan (2011). Local Plan Policy LP 21 carries forward and develops DMP Policy SD 6, and is considered a suitable replacement to retain the intention of this paragraph's meaning.</p>
60	Policy E5 – Sustainable Drainage (SuDS)	p 67	Renumber policy from E5 to E4.	To account for deleted policies as per the above modifications.
61	Policy E6 – Permeable Forecourts	p 68	Renumber policy from E6 to E5.	To account for deleted policies as per the above modifications.
62	Policy O1 – Improving Ham Parade	p 74	Amend title of Policy O1 as follows: “Policy O1 – Improving Ham Parade”	For consistency with other ‘Opportunities for Changes’ policies.
63	Policy O2 – Improving St Richard’s Square	p 76	Amend title of Policy O2 as follows: “Policy O2 – Improving St Richard’s Square”	For consistency with other ‘Opportunities for Changes’ policies.
64	Policy O2 – Improving St Richard’s Square	p 76 para 9.5.1	Add subtitle “Policy Application” above paragraph 9.5.1	For consistency with the structure of other policies within the Plan.
65	Policy O3 – To enhance and improve the quality and safety of Central Petersham by:	p 78 paras 9.7.1 & 9.7.2	Reorder policies such that the text of paragraph 9.7.2 reads before that of paragraph 9.7.1.	In accordance with the modification recommended by the Examiner (see #23), it is considered that these read more logically in the proposed order.
66	Policy O4a – Ham Close	p 80 para 9.8.2	Amend the last sentence of paragraph 9.8.2 to read:	To update the Neighbourhood Plan from the Submission version.

			“ Work related to this project Consultation and feasibility studies will continue throughout 2018 7 and proposals for the site will be judged against relevant policies in the Richmond Local Plan and the Neighbourhood Plan.”	
67	Policy O4a – Ham Close	p 80 para 9.9.1	Amend “ Policy Implementation ” to read “ Policy Application ”.	For consistency with the structure and naming of other policies within the Plan.
68	Policy O4a – Ham Close	p 80 para 9.9.2	Amend the first sentence of paragraph 9.9.2 in the Reasoned Justification as follows: “The Richmond Local Plan policies LP 1, and LP 21 and LP 34, as well as SA 15 (Character and Design of New Housing and sustainable development and construction) provide the planning design context for the redevelopment of this site.”	To correct factual errors, and ensure that the correct Local Plan policies are referenced.
69	Policy O4a – Ham Close	p 81 para 9.9.6	Delete paragraph 9.9.6 of the Reasoned Justification.	To ensure the supporting text accords with the modification recommended by the Examiner (see #24).
70	Policy O4b – Ham Street / Ashburnham Road	p 81 para 9.10.2	Amend “ Policy Implementation ” to read “ Policy Application ”.	For consistency with the structure and naming of other policies within the Plan.
71	Policy O5 – Cassel Hospital	p 84	Amend title of Policy O5 as follows: “ Policy O5 – Cassel Hospital ”	For consistency with other ‘Opportunities for Changes’ policies.
72	Policy O5 – Cassel Hospital	p 84 para 9.14.2	Amend “ Policy Implementation ” to read “ Policy Application ”.	For consistency with the structure and naming of other policies within the Plan.

73	St Michael's Convent	p. 86 para 9.15.1	Amend the last sentence of paragraph 9.15.1 as follows: "A planning application has been submitted approved for residential use."	To update the Neighbourhood Plan to accord for the adoption of the Richmond Local Plan on 3 July 2018.
74	St Michael's Convent	p. 86 para 9.15.2	Amend the first sentence of paragraph 9.15.2 as follows: "The Convent is listed Grade II and parts of the grounds are designated as Other Land of Townscape Importance. LBRuT are also considering a further designation of the grounds as an and Other Site of Nature Importance."	To update the Neighbourhood Plan to accord for the adoption of the Richmond Local Plan on 3 July 2018.
75	Policy O6 – St Michael's Convent	p 86	Amend title of Policy O6 as follows: " Policy O6 – St Michael's Convent "	For consistency with other 'Opportunities for Changes' policies.
76	Policy O6 – St Michael's Convent	p 86 para 9.16.2	Amend " Policy Implementation " to read " Policy Application ".	For consistency with the structure and naming of other policies within the Plan.
77	Policy O7 – Previously Developed Brownfield Land and Other Small Sites	p 88 para 9.18.1	Amend " Policy Implementation " to read " Policy Application ".	For consistency with the structure and naming of other policies within the Plan.
78	Character Area Studies Map	p 101	This map should include a title and a key on the same page (the character areas are currently listed on the following page).	To ensure the map is clearly legible.
79	Glossary – Call in	p 134	Update 'Secretary of State for Communities and Local Government' to read 'Secretary of	To update the Neighbourhood Plan from the Submission version.

			State for Housing , Communities and Local Government’.	
80	Glossary - Examination	p 137	Delete definition entry and replace with “ See Independent Examination ”	To ensure conformity between the definitions of ‘Examination’ and ‘Independent Examination’, and to ensure that these relate to Neighbourhood Plans.
81	Glossary – Green Belt	p 138	Delete definition and replace with: “ A national policy designation. There is a general presumption against inappropriate development in the Green Belt. In line with the NPPF, the Green Belt serves five purposes: to check the unrestricted sprawl of large built-up areas; to prevent neighbouring town merging into one another; to assist in safeguarding the countryside from encroachment; to preserve the setting and special character of historic towns; and to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. ”	To correct a factual error.
82	Glossary – Independent Examination	p 138	Amend as follows: “An examination of a proposed neighbourhood plan, carried out by an independent person, set up to consider whether a neighbourhood plan meets the basic conditions and other legal requirements .”	To correct a factual error.
83	Glossary – Local Centre	p 139	Amend the last sentence as follows: “Most are defined on the	To update the Neighbourhood Plan to accord for the adoption of the Richmond Local Plan on 3 July 2018.

			LBRuT Proposals Policies Map by an Area of Mixed Use boundary (AMU).”	
84	Glossary – Local Development Framework	p 139	Amend as follows: “See Local Plan and Local Development Document ”.	No definition for ‘Local Development Document’ is included within the Plan.
85	Glossary – London Plan	p. 140	Amend the last sentence as follows: “The plan was first published by the Greater London Authority in 2004 and has been amended in 2008, 2011, 2013, 2015 and most recently the 2015-16 Minor Alterations. The draft Plan was prepared in line with the 2016 London Plan. A draft new London Plan was subject to consultation in November 2017. ”	To update the Neighbourhood Plan from the Submission version.
86	Glossary – Main centre	p 140	Amend the last sentence as follows: “They are defined on the LBRuT Proposals Policies Map by a Main Centre Boundary (MCB).”	To update the Neighbourhood Plan to accord for the adoption of the Richmond Local Plan on 3 July 2018.
87	Glossary – National Planning Policy Framework (NPPF)	p 141	Amend the first sentence as follows: “The NPPF, published in March 2012, sets out the Government’s planning policies for England and how these are expected to be applied, alongside other national planning policies.” Add after the last sentence: “ The draft Plan was prepared in line with the	To update the Neighbourhood Plan from the Submission version.

			<u>March 2012 NPPF. The revised NPPF was published on 24 July 2018.</u>	
88	Glossary – Neighbourhood Centre	p 141	Amend the last sentence as follows: “Most are defined on the LBRuT <u>Proposals Policies</u> Map by an Area of Mixed Use boundary (AMU).”	To update the Neighbourhood Plan to accord for the adoption of the Richmond Local Plan on 3 July 2018.
89	Glossary – Neighbourhood (Development) Plan	p 141	Amend the last two sentences as follows: “In the London Borough of Richmond upon Thames, the Ham and Petersham Neighbourhood Forum <u>has</u> prepared <u>ing</u> a Neighbourhood Plan for its area. LBRuT <u>has</u> prepared <u>ing</u> Village Plans for other areas.”	To update the Neighbourhood Plan to accord for the adoption of the Richmond Local Plan on 3 July 2018.
90	Glossary – Neighbourhood Forum	p 141	Amend the last sentence as follows: “There can only be one forum in an <u>neighbourhood</u> area.”	To ensure clarity of definition.
91	Glossary – Parking Standards	p 142	The second entry in the glossary listed as “Parking Standards” should be renamed to read “Parade of Local Importance”.	To correct a typographical error.
92	Glossary – Parking Standards [<i>sic: Parade of Local Importance</i>]	p 142	Amend the last sentence as follows: “Many are defined on the LBRuT <u>Proposals Policies</u> Map by an Area of Mixed Use boundary (AMU).”	To update the Neighbourhood Plan to accord for the adoption of the Richmond Local Plan on 3 July 2018.
93	Glossary – Proposals Map	p 143	This glossary entry should be titled ‘Policies Map’ rather than ‘Proposals Map’.	To update the Neighbourhood Plan to accord for the adoption of the Richmond Local Plan on 3 July 2018.

94	Glossary – Village Planning Guidance SPDs	p 148	Amend the first sentence as follows: “SPDs that are being developed by LBRuT to support the Village Plans.”	To update the Neighbourhood Plan from the Submission version.
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Map 1:

1:11,000 at A3 scale

Ham and Petersham Neighbourhood Area

