

All responses to the Draft Sustainability Appraisal Scoping Report  
[https://www.richmond.gov.uk/new\\_local\\_plan\\_direction\\_of\\_travel\\_engagement](https://www.richmond.gov.uk/new_local_plan_direction_of_travel_engagement)



Consultation from 24 February until 5 April 2020

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Please note, the responses below are exactly as received from the respondents and have not been edited by the Council. They are not alphabetically ordered or in any other order of priority.

Respondent reference no.	Name / Organisation
3.	Katie Parsons, Historic England
13.	Heather Archer, Highways England
17.	Hannah Bridges, Spelthorne Borough Council
19.	DP9 on behalf of London Square Developments

**Table 1:** All respondents to the engagement

**Detailed comments as received:**

Respondent ref. no.	Name / Organisation	Detailed comment
3.	Katie Parsons, Historic England	<p>As you will be aware under the provisions of Article 5(1) of the SEA Directive there is a requirement to assess the likely significant effects which the Policies and proposals of a Plan might upon “cultural heritage including architectural and archaeological heritage”. In terms of the historic environment, whilst we would many aspects of the Appraisal, we have the following comments to make:</p> <ul style="list-style-type: none"> <li>• Plans, Policies, and Programmers: there are a number of other relevant plans and programmes that should be included in section 2.2:</li> <li>• UNESCO World Heritage Convention</li> <li>• European Landscape Convention</li> <li>• The European Convention on the Protection of Archaeological Heritage</li> <li>• Convention for the Protection of the Architectural Heritage of Europe</li> <li>• Planning (Listed Buildings &amp; Conservation Areas) Act 1990</li> <li>• Ancient Monuments &amp; Archaeological Areas Act 1979</li> <li>• The Royal Botanic Gardens Kew World Heritage Site Management Plan</li> <li>• The local level is also important in setting the appropriate context for the scoping report, which could helpfully draw on Richmond’s existing characterisations studies, local lists, Building of Townscape Merit SPD, Conservation Area Appraisals etc. Aspects of the emerging plan have the potential to impact upon the wider historic environment across administrative boundaries. It may be necessary to use local documents from neighbouring boroughs as part of the SA’s baseline evidence where relevant.</li> </ul> <p>Section 3.24 – Historic Environment: This section is locally specific, detailed and comprehensive. We are pleased to see that cross boundary issues are being taken into consideration.</p> <p>Sustainability issues page 88 – we welcome that the conservation of the historic environment is recognised as sustainability issue. Column 3 should be expanded upon to make reference to the Kew World Heritage Site and to the borough’s Registered Parks and Gardens. Issues related to traffic congestion, air quality, noise pollution and other problems can affect the historic environment and detract from the setting of heritage assets and so it would be useful if this was also identified as an issue.</p> <p>SA objectives page 101 – this section should make reference to the Kew World Heritage Site and should reference the objectives set out in the WHS Management Plan.</p>

Respondent ref. no.	Name / Organisation	Detailed comment
		Method for Generation of Alternatives – The historic environment should be a factor when considering a method for the generation of alternative proposals. The impact of proposals on the significance of heritage assets should be taken into consideration at an early state. In terms of sites, this should be based on more than just measuring the proximity of a potential allocation to heritage assets. Impacts on significance are not just based on distance or visual impacts, and assessment requires a careful judgement based on site visits and the available evidence base.
13.	Heather Archer, Highways England	Of growing concern to Highways England is air quality and the impact of development traffic contributing to emissions from traffic on the SRN. We shall be paying particular attention to air quality matters and stress the need for appropriate monitoring. It is noted that the document does make reference to the SRN and highlights that there are high levels of traffic in the borough in the morning and evening peaks. However, no reference has been made to how the borough plans to reduce the impact of this (i.e. it should make reference to the car-free or car-lite proposals stated in the Local Plan Direction of Travel Consultation document). We recommend that this document should therefore ensure it identifies ways to reduce peak hour flows on the SRN.
17.	Hannah Bridges, Spelthorne Borough Council	The SA should be a key factor in the determination of the strategy pursued through the new Local Plan. This should be an iterative process and should seek to minimise the adverse impacts arising through the Plan.
19.	DP9 on behalf of London Square Developments (regarding the Greggs Bakery site)	Sustainability Appraisal – p. 6 The approach to considering environmental, social and economic sustainability in plan-making is supported. Environmental impact arising from pollution is particularly relevant to the subject Site. Its current industrial use has the potential to generate high levels of commercial vehicle traffic and therefore significant air quality impacts to surrounding residential uses. As part of the approach to promoting environmental sustainability, consideration must be given to protecting established residential communities from poor air quality.