

# Local Plan Direction of Travel Consultation Responses

Planning

*30 November 2020*

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### About the consultation

The consultation was undertaken Monday 24 February to Sunday 22 March 2020.

The consultation on the [Direction of Travel](#) was accompanied by a [summary leaflet](#), and responses could be submitted through an online questionnaire, by email or post. There was also a Call for Sites (with a separate questionnaire) and statutory bodies were consulted on the Sustainability Appraisal Scoping Report which was also available for comment.

The consultation was extended to Sunday 5 April 2020 (as the Mayoral and London Assembly elections were postponed there was no purdah period, and due to the implications of COVID-19).

### About the respondents

Comments were received from 88 respondents, some responded to more than one of the documents - comprising 71 on the Direction of Travel, 33 to the Call for Sites, and 4 to the Scoping Report. Respondents included a range of residents and amenity groups, landowners, organisations and statutory consultees. The list of all respondents (as received and not alphabetically ordered or in any other order of priority) is as follows:

| Respondent reference no. | Name / Organisation                                         | Responded to        |                |                                         |
|--------------------------|-------------------------------------------------------------|---------------------|----------------|-----------------------------------------|
|                          |                                                             | Direction of Travel | Call for Sites | Sustainability Appraisal Scoping Report |
| 1.                       | David Mattes                                                | X                   |                |                                         |
| 2.                       | CBRE on behalf of LGC Ltd, Teddington                       | X                   | X              |                                         |
| 3.                       | Katie Parsons, Historic England                             | X                   | X              | X                                       |
| 4.                       | Lambert Smith Hampton on behalf Metropolitan Police Service | X                   |                |                                         |
| 5.                       | Helen Monger, London Parks & Gardens Trust                  | X                   |                |                                         |
| 6.                       | Marine Management Organisation                              | X                   |                |                                         |
| 7.                       | Michael P Martin, Milestone Commercial                      | X                   |                |                                         |
| 8.                       | Sharon Jenkins, Natural England                             | X                   | X              |                                         |
| 9.                       | Shirley Meaker                                              | X                   |                |                                         |
| 10.                      | Stuart Morgans, Sport England                               | X                   |                |                                         |
| 11.                      | Surrey County Council                                       | X                   | X              |                                         |
| 12.                      | Tim Lester                                                  | X                   |                |                                         |
| 13.                      | Heather Archer, Highways England                            | X                   | X              | X                                       |
| 14.                      | Mayor of London                                             | X                   |                |                                         |
| 15.                      | Transport for London (TfL)                                  | X                   |                |                                         |
| 16.                      | Avison Young on behalf of National Grid                     | X                   |                |                                         |
| 17.                      | Hannah Bridges, Spelthorne Borough Council                  | X                   |                | X                                       |

| Respondent reference no. | Name / Organisation                                                                                                             | Responded to        |                |                                         |
|--------------------------|---------------------------------------------------------------------------------------------------------------------------------|---------------------|----------------|-----------------------------------------|
|                          |                                                                                                                                 | Direction of Travel | Call for Sites | Sustainability Appraisal Scoping Report |
| 18.                      | Phoebe Juggins, Department for Education                                                                                        | X                   |                |                                         |
| 19.                      | DP9 Ltd on behalf of London Square Developments                                                                                 | X                   | X              | X                                       |
| 20.                      | Gary Backler, Friends of the River Crane Environment (FORCE) (and supported by Crane Valley Partnership)                        | X                   |                |                                         |
| 21.                      | Lucy Wakelin, Transport for London (TfL) Commercial Development                                                                 | X                   | X              |                                         |
| 22.                      | Jimmy Wallace, Richmond Athletic Association                                                                                    | X                   | X              |                                         |
| 23.                      | Peter Willan & Paul Velluet on behalf of Old Deer Park Working Group                                                            | X                   |                |                                         |
| 24.                      | Paul Velluet                                                                                                                    | X                   | X              |                                         |
| 25.                      | Phoebe Quayle                                                                                                                   | X                   |                |                                         |
| 26.                      | Hannah Lukacs                                                                                                                   |                     | X              |                                         |
| 27.                      | Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green) | X                   |                |                                         |
| 28.                      | Alice Shackleton on behalf of The Kew Society                                                                                   | X                   |                |                                         |
| 29.                      | Richmond Cycling Campaign                                                                                                       | X                   |                |                                         |
| 30.                      | Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs                                                    | X                   |                |                                         |
| 31.                      | Tim Catchpole on behalf of the Mortlake with East Sheen Society                                                                 | X                   | X              |                                         |
| 32.                      | Mark Jopling on behalf of Udney Park Playing Fields Trust                                                                       | X                   |                |                                         |
| 33.                      | Tim Catchpole on behalf of the Mortlake Brewery Community Group                                                                 | X                   | X              |                                         |
| 34.                      | DP9 Ltd on behalf of Harlequin Football Club Limited                                                                            | X                   | X              |                                         |
| 35.                      | Alice Roberts, CPRE London                                                                                                      | X                   | X              |                                         |
| 36.                      | Rebecca Marwood, NHS Property Services Ltd                                                                                      | X                   |                |                                         |
| 37.                      | John Waxman, Crane Valley Partnership                                                                                           | X                   |                |                                         |
| 38.                      | Justine Langford on behalf of Ham and Petersham Neighbourhood Forum                                                             | X                   |                |                                         |
| 39.                      | Solomon Green                                                                                                                   | X                   |                |                                         |
| 40.                      | Jamie Edwards                                                                                                                   | X                   |                |                                         |
| 41.                      | Anthony Swan                                                                                                                    | X                   |                |                                         |
| 42.                      | Jeremy Gill                                                                                                                     | X                   |                |                                         |
| 43.                      | Paul Hart Prieto                                                                                                                | X                   |                |                                         |
| 44.                      | Roger Cutler                                                                                                                    | X                   |                |                                         |
| 45.                      | Sally Beeson                                                                                                                    | X                   |                |                                         |
| 46.                      | Joan Gibson                                                                                                                     | X                   | X              |                                         |
| 47.                      | Trevor Rowntree                                                                                                                 | X                   |                |                                         |
| 48.                      | Roger Wilson on behalf of Roger Wilson Consulting LLP                                                                           | X                   |                |                                         |
| 49.                      | Margaret Edwards                                                                                                                | X                   |                |                                         |
| 50.                      | John O'Brien                                                                                                                    | X                   |                |                                         |
| 51.                      | Su Bonfanti                                                                                                                     | X                   |                |                                         |
| 52.                      | Winston W Taylor                                                                                                                | X                   |                |                                         |
| 53.                      | Richard Woolf on behalf of McDaniel Woolf Architects                                                                            | X                   |                |                                         |
| 54.                      | Paul Luton                                                                                                                      | X                   |                |                                         |
| 55.                      | Jon Rowles                                                                                                                      | X                   | X              |                                         |
| 56.                      | Rob Kennedy, Environment Agency                                                                                                 | X                   |                |                                         |
| 57.                      | Tom Clarke, Theatres Trust                                                                                                      | X                   |                |                                         |
| 58.                      | Michael Atkins, The Port of London Authority                                                                                    | X                   |                |                                         |

| Respondent reference no. | Name / Organisation                                                              | Responded to        |                |                                         |
|--------------------------|----------------------------------------------------------------------------------|---------------------|----------------|-----------------------------------------|
|                          |                                                                                  | Direction of Travel | Call for Sites | Sustainability Appraisal Scoping Report |
| 59.                      | Paul Massey                                                                      | X                   |                |                                         |
| 60.                      | Kingsley Izundu, Royal Borough of Kingston upon Thames                           | X                   |                |                                         |
| 61.                      | Tom Minns                                                                        | X                   |                |                                         |
| 62.                      | Kathleen Massey                                                                  | X                   |                |                                         |
| 63.                      | Carol Rawlings                                                                   | X                   |                |                                         |
| 64.                      | Johanna Eschbach on behalf of RiBRA (Richmond Bridge Residents Association)      | X                   |                |                                         |
| 65.                      | SSA Planning Limited on behalf of Kentucky Fried Chicken (Great Britain) Limited | X                   |                |                                         |
| 66.                      | Robert Philip Cunliffe                                                           | X                   |                |                                         |
| 67.                      | William Mortimer                                                                 | X                   |                |                                         |
| 68.                      | Mark Jopling                                                                     | X                   |                |                                         |
| 69.                      | Geoff Bond on behalf of Ham & Petersham Association                              | X                   |                |                                         |
| 70.                      | Melissa Compton-Edwards                                                          | X                   |                |                                         |
| 71.                      | Patrick Wood                                                                     | X                   |                |                                         |
| 72.                      | Andrew Weeks                                                                     |                     | X              |                                         |
| 73.                      | Pegasus Group on behalf of Sheen Lane Developments                               |                     | X              |                                         |
| 74.                      | Savills on behalf of Thames Water                                                |                     | X              |                                         |
| 75.                      | David Taylor                                                                     |                     | X              |                                         |
| 76.                      | Henry Clive                                                                      |                     | X              |                                         |
| 77.                      | Jennifer Farrell                                                                 |                     | X              |                                         |
| 78.                      | Graham Green                                                                     |                     | X              |                                         |
| 79.                      | Max Hampton                                                                      |                     | X              |                                         |
| 80.                      | Lira Cabatbat                                                                    |                     | X              |                                         |
| 81.                      | Dawn Roads                                                                       |                     | X              |                                         |
| 82.                      | Campbell Brown                                                                   |                     | X              |                                         |
| 83.                      | Chris O'Rourke                                                                   |                     | X              |                                         |
| 84.                      | Natasha Waithe                                                                   |                     | X              |                                         |
| 85.                      | Malcolm Hay                                                                      |                     | X              |                                         |
| 86.                      | Hester Huttenbach                                                                |                     | X              |                                         |
| 87.                      | Clarissa Louise Angus                                                            |                     | X              |                                         |
| 88.                      | Defence Infrastructure Organisation on behalf of the Ministry of Defence         |                     | X              |                                         |

### Summary of main issues raised

Officers have produced a summary of the main issues raised for each question/area of comment as set out in this document, and an overall summary at the end of each section/topic. As responses could be made via an online questionnaire and/or by email, these have been collated and cross referenced as appropriate, reflecting the order of the questionnaire format on the Direction of Travel and then separately the responses to the Call for Sites. There are schedules of all comments in full and appendices with any supporting documents submitted which are published separately for each consultation:

- Schedule of Direction of Travel All Responses Received
- Schedule of Direction of Travel All Responses Received - Appendices
- Schedule of Call for Sites All Responses Received
- Schedule of Call for Sites All Responses Received - Appendices
- Schedule of Sustainability Appraisal All Responses Received.

## **Summary of main issues raised**

### **Direction of Travel**

#### **Introduction**

- The Mayor of London notes all development plan documents in London must be in general conformity with the London Plan, and publication of the final version of the new London Plan is anticipated in the summer when it will form part of Richmond's development plan. Welcomes the ten themes identified and the new challenges, changing priorities and key shifts intends to address. Welcomes early thinking and recognises important to address housing delivery and ensuring the demand for other land uses can be met.
- Some respondents supported the need for a new Plan, although others raised queries. A respondent felt the explanation of what a local plan is not clearly explained, referring to Government guidance to address housing needs, economic, social and environmental priorities. A respondent felt local residents views are regarded as not important. A respondent felt it was too generalised, and could not find the local plan. A respondent felt the document was not in an accessible format to share with the community, therefore interest to respond to the consultation was low. A respondent did not have time to give detailed replies to all the questions. RB Kingston suggested it was drafted in a positive user-friendly way. A respondent supported setting stretching standards and targets to push developers, although a respondent felt pursuing policies to show environmental awareness is a waste of resources. A respondent felt the plan needs to be flexible to accommodate changes, take a strategic 10 year view, with parts evolving as trends and legislation evolves i.e. concentrate on the parts that do require updating.
- Some respondents supported the climate emergency and sustainability, although a respondent felt the implementation date was too far away for an emergency; a respondent felt other priorities are more important. Some respondents supported the focus on population growth, but a respondent felt there is overpopulation. A respondent felt it did not mention how the level of traffic gridlock will be reduced, exacerbated by the closure to traffic of Hammersmith Bridge, and at black spots. A respondent felt air quality was not given the prominence it deserves. A respondent felt it is incorrect to state the borough is prosperous, safe and healthy, as in many areas there is relative deprivation and a marked variance in health outcomes. A respondent felt it did not address Disaster Management e.g. the major risk of flooding. A respondent suggested exploration of the Slough and Heathrow Travel to Work Area, as cause of congestion and pollution. A respondent felt parking facilities should not be removed, particularly from Twickenham Embankment, as shops, pubs, clubs and restaurants depend on customers being able to park nearby.
- A number of respondents (who made comments later on in the consultation period) commented on uncertainty due to Covid-19, and potential implications for residents, visitors, businesses and employees.
- Many respondents have made set out general introductory information, such as about their association/group or about a particular site if they are a landowner or developer.
- DP9 on behalf of London Square Developments supported the reasons why a new Local Plan is needed, suggesting the former Greggs Bakery site (see also Call for Sites) is not sustainably located for large-scale employment use and will deliver 116 new homes, noting the relevance of viability and this must be considered in preparing policies which seek to protect certain uses.
- Richmond Athletic Association set out they are continuing to investigate how they can improve the existing facilities at the ground to meet increasing demand from the local community and secure the future of rugby on the site, and are in the early stages of developing a revised masterplan (see also Call for Sites). Support for the vision and themes identified, suggesting the objective to protect and improve the borough's Heritage, Culture,

Green infrastructure and open land should also recognise the requirement to make best use of existing resources to ensure these can be enhanced to better meet residents' needs.

- Old Deer Park (ODP) Working Group question whether the adoption of the Climate Emergency Strategy necessitates a new strategic vision and a new place-making strategy, and whether the growth in population and anticipated housing target, and other Government changes, are justification for preparing a new Local Plan so soon after the adoption of the current Plan. Welcome the opportunity of putting forward issues relating to the care, conservation, development and management of the ODP for consideration, primarily relating to the failure of the Council and the Inspector to consider and respond to unresolved designations relating to ODP in the 2018 Local Plan and SPD. This position was also made by an individual, Prospect of Richmond and the Kew Society. Prospect of Richmond (and their comments supported by Friends of Richmond Green) also felt the approach seems to promote growth while putting at risk the quality of the environment, and with growth a balance is important e.g. in central Richmond the mix of retail, office and residential use. They acknowledge little evidence at this stage, but suggest evidence aware of don't believe supports proposals to dilute current planning policies. Their focus on the heart of Richmond (including Conservation Areas for Central Richmond, Richmond Green and the Riverside) as having valuable diversity, and it is essential the characteristics are maintained to sustain the character, quality and historic significance. The Kew Society also questioned whether the new vision would be a fundamental change to planning policy, and it should not be a question of either protection or something "you want" e.g. whether shortage of affordable housing could override designation of protected open lands that would be lost gone forever, and long evolved and tested planning policy and practice would be destroyed.
- Richmond Cycling Campaign welcome the increased focus on supporting non-car travel modes, and wider sustainability issues. Ask the plan must start from the assumption that the private car should not be designed into the borough, need a robust plan to make sure every person, everywhere, can make safe, low- or no- carbon transport decisions - to support a range of crucial policy imperatives including keeping people active, reducing borough carbon emissions, prioritisation of public transport, and maximising space available for people, and paint this vision in 20 years. Key challenge is the dependence on cars.

#### Does this document raise any specific equality impacts which would affect particular groups or communities of people in Richmond?

- A number of respondents said no, but a number of individuals mentioned their own specific issues, such as older people or related to how access to transport affects different groups. The comments raised by individual respondents were:
  - Parking standards – number of spaces could impact certain protected groups, some of whom are less likely to drive, and developments with poor public transport accessibility can have a negative impact on quality of life.
  - Communities on the west of the borough are more likely to be commuting to work in the Slough & Heathrow Travel To Work Area than those in the east, and question if there is a need for better public transport to those areas e.g. extend proposed West London Orbital Railway to Twickenham - drill down into these TTWA statistics.
  - Focus on climate change detracts resources from other more essential areas e.g. state of roads, empty shops, litter, crime.
  - Stakeholders referred to are not identified.
  - Anyone who understands scientific issues, also anyone suffering from any of the serious environmental issues specific to the borough e.g. rising anti-social behaviour in less affluent parts of the borough.

- Car drivers and pedestrians are disadvantaged while cyclists benefit above everyone else. A lack of equality in road and pavement use.
- Young and old have specific needs and should be given priority. Protecting air quality – reducing pollution, protecting green spaces, cultural centres and beautiful buildings, are vital for health and well-being of all.
- Reliance on cars/vehicles adversely affects less wealthy and socially excluded groups and causes lack of social cohesion.
- Needs of older people probably underrepresented e.g. in relation to housing needs.
- Traveller community – need to be considered as indicated in Housing section.
- Introduction is fair and reasonable.
- Many disadvantaged groups (BAME, Disabled) have fewer employment opportunities and less likely to get jobs in central London accessible by public transport - parking restrictions proposed likely to restrict their employment opportunities more.
- Make clear if document is available in other formats or languages.
- Essential built environment is adapted to frail and disabled e.g. public space more user-friendly for range of users e.g. people with buggies.
- Disappointed consultation about Mortlake Brewery site that the Council has failed to understand issues of ramming so many dwellings and school into area where movement is constrained between river and railway. Suggestions of extended catamaran service using Thames have been ignored.



### Scale of the challenge, opportunities and setting the Direction of Travel

#### What challenges do you think Richmond borough faces now and in the future?

- The majority of respondents mentioned challenges that were already covered in the Direction of Travel consultation document, or felt the key challenges were articulated. These included references to the climate emergency, air quality, protecting/managing all green spaces, sustainable development, ageing population, encouraging appropriate development on brownfield and change of use, and affordable housing. Some referred to the need to change behaviours e.g. over cars.
- Some respondents commented that the rising population will add pressure to a range of services/facilities, a burden on the already congested area and local infrastructure. Some respondents felt the borough should not be a wealthy dormitory, but remain somewhere a range of people can live and work. Some referred to recognising the diversity of the borough, and protecting the character, special heritage and areas of historic interest. A number linked this with housing densities, not a one size fits all approach, the challenges of accommodating development, and the pressures to build on land including small pockets and Green Belt. A respondent felt the concept of hyper-local plans -and specific Village Plans where they remain useful - should be used and built upon. A respondent felt there must be a

strong approach on green space to direct developers to where the Plan supports development. Some respondents referred to the quality of new homes. Some specific sites mentioned – Stag Brewery, Udney Park Playing Fields.

- A number of respondents mentioned travel, traffic and parking issues. Richmond Cycling Campaign raised concerns if the borough fails to design and build sustainable transport options (reducing car dependency) we will live in an area blighted by more congestion, and resulting risks of pollution, road danger, severance and inactivity. Ham & Petersham Neighbourhood Forum referred to the Government's plan for decarbonising streets and achieving 'Vision Zero' road safety targets. A respondent raised how to cater for orbital traffic. Some referred to specific areas e.g. Ham, traffic between Kingston and Richmond, gridlock at critical junctions, 20mph, and issues e.g. commuter parking, more protected cycle lanes, support for Crossrail. Some referred to the electric economy, electric buses, electric charging points.
- A number of respondents mentioned declining/supporting centres, shops and businesses. A respondent felt there was a lack of street markets, which makes it more difficult to start up a business. A respondent said encourage low cost premises for pop up shops and micro businesses. A respondent felt business rates are too high and have driven out small business, charity shops compete with small shopkeepers, and a detrimental increase in fast food outlets, nail bars, hairdressers, tanning salons and empty shops. A respondent referred to less spending and online shopping trend. A respondent felt opportunities for employment decreasing due to loss of office space and pressure on industrial space, and firms relocating from the Slough and Heathrow Travel to Work Area to avoid curbs on car parking and congestion charging means jobs are now located in areas with poor public transport accessibility. Some respondents mentioned shortages of staff in health, care, hospitality etc. and a respondent mentioned ensuring students have business skills. A respondent mentioned supporting high speed internet.
- A number of respondents mentioned funding/investment/resources, the context of budget constraints. A respondent felt should focus on improving the quality of infrastructure for existing residents, not the climate emergency.
- Some respondents also referred to aviation and Heathrow. A respondent referred to poor air quality from aircraft and road traffic generated by the airport. A respondent referred to threat of a third runway.
- Some respondents mentioned Covid-19. A respondent felt the population forecasting, especially by age range, out of date and inaccurate, which is important as underpins the assumptions driving decisions and expenditure – suggest a pause and rethink/replan in a few years time. A respondent noted possibility of reoccurring and new pandemics. A respondent felt many shops might not reopen.
- Some individual respondents raised specific issues, including rough sleeping, crime and policing, water pollution, roadworks. A respondent said a serious rise in the use of class A drugs and the damaging effect on communities. A respondent felt more active policing of petty crime. A respondent felt the Council wasted money e.g. throwing out the plan for Twickenham Embankment, on cycle lanes/routes, and a shortage of money put into medical and social care.

#### How might our role in London change in the future?

- Some respondents identified the borough's green spaces and Arcadian landscapes as important, a green lung of London for recreation, attracting visitors e.g. Richmond Park, Richmond riverside, which must continue. A respondent noted the historic role as mediator between inner and outer London, and felt as this role will change more accessibility and management of the open spaces/landscapes is crucial.



- Some respondents commented on leadership. The Ham & Petersham Neighbourhood Forum response said by leading to address the challenges with visionary, evidence based policies and implementation – effective leadership with consultation to agree ways to achieve the necessary changes, representing quiet voices and hard to reach groups e.g. children. RB Kingston felt given the priority given to the climate emergency, the role would change in the approaches and actions to minimise environmental impact, in terms of cutting carbon emissions, waste and pollution - necessitating a new strategy vision and place making strategy, and clear and stringent policy for new developments. A respondent said be a role model for other Boroughs and the GLA. A respondent suggested action across London on key infrastructure e.g. coordinated approach to repair of Hammersmith Bridge, challenging rail operators who provide substandard services, to reduce homelessness and rough sleeping in combination with services related to drugs/alcohol. A respondent felt should become a world leader in ecology and ecology-technology hub for London. A respondent felt depends on future legislation affecting responsibility of Councils and Mayor of London, but would like to see a joined-up approach e.g. safe, connected pedestrian and cycle routes, Clean Air Zones including TfL controlled roads and London-wide mandatory car free/car lite developments regardless of PTAL - guiding principle apply to all developments is whether easily reachable without a car, as Government acknowledge public transport and active travel will be the natural first choice for daily activities, using cars less.
- Some respondents identified made positive comments on future opportunities. A respondent noted encourage NPL and start up businesses, encourage schools and St Mary's University. A respondent noted as working from/at home becomes more realistic for more people, could become a place where more SMEs flourish. A respondent felt public transport links need to be frequent and reliable. A respondent seeing a decline in retail businesses, encourage new retail in Richmond's centre to ensure its popularity continues.
- Some respondents felt it might not change, not at all etc.
- Some respondents raised concerns. A respondent said stop worrying about virtue signalling projects and focus on the basics. A respondent felt we are not relevant to the rest of London. A respondent felt likely to become less important. A respondent felt mounting pressure to build cheaper, smaller flats/houses and green spaces may come under pressure to be built upon. A respondent felt in danger of becoming a no go area for young families and poorer people. A respondent felt the Government may give the Mayor rent controls and may need to react to new Mayor's priorities. A respondent felt will become a dormitory town due to accelerating loss of office space. A respondent felt without major changes, will continue to attract wealthiest and make housing for middle and lower income workers difficult – expand social housing to address this, and implement new low emissions and private vehicle restrictions to lower carbon footprint. A respondent said yet to see information about plan to recover from disaster scenarios e.g. flooding, and formalise/extend the reliance on local people to respond to needs of elderly and infirm resulting from Covid-19 lockdown for future catastrophic situations.
- A respondent felt over the past 20 years moved from suburban to urban and likely to continue, used to be on fringe but boundary moved to M25 (or beyond) and dense urban belt inhabitants travel through to work in central London.

#### What do you think should be our priorities in the new vision?

- A number of respondents raised priorities that were already covered in the Direction of Travel consultation document, or felt the key priorities were articulated. These included references to climate change and sustainability, air quality, affordable housing, active travel, and the focus on brownfield sites and making efficient use of land, and specific groups both young and old people. A respondent referred to Government guidance to address housing needs, economic, social and environmental priorities.

- A number of respondents commented on sustainable travel - promoting walking, public transport and cycling, reducing car use and need to travel. Richmond Cycling Campaign raised embedding new transport hierarchy, and working in partnership with other authorities to deliver sustainable transport options e.g. liveable neighbourhoods bid. Ham & Petersham Neighbourhood Forum referred to the Government's plan for decarbonising streets, creating cohesive and inclusive self-sustainable communities and to achieve Vision Zero for safe active travel. A respondent felt need to incentivise travel by foot, bike and public transport for local journeys. A respondent suggested a rating system that takes account of active travel as well as public transport provision. Some respondents suggested reducing parking, a respondent suggested more parking. Some comments related to encouraging electric transport, quality of roads.
- A number of respondents commented about green infrastructure, including protecting heritage, open land and biodiversity, including no development on Green Belt, MOL. A respondent felt need to identify green chains and wildlife corridors better. A respondent suggested more re-wilding to protect wildlife, responsibility as a lung for London. A respondent felt Richmond should be a global leader, and lead London as the world's first National Park City. A respondent felt opportunities at certain locations for land currently designated as green and open land to be better utilised to meet growth needs and this can be achieved without causing any harm or detrimental impact upon the availability of meaningful green and open spaces.
- A number of respondents commented on the economy, helping business to grow, sustainable jobs. A respondent felt the existing protection of employment land will not allow to meet increasing housing delivery targets, and should consider brownfield employment land unviable for continued use for housing. A respondent felt the borough has responsibility to be one of leading boroughs for the new sustainable economy, accelerated post covid-19. A respondent felt people do not realise how much employment there is in the borough or that the Plan needs to protect land for employment purposes.
- Some comments related to character and design. The Ham & Petersham Neighbourhood Forum refer to the Mayor of London's Good Growth by Design. A respondent felt it was not important to have individual policies/strategies for different parts of the borough, like the Village Plans, as took resources and have not delivered, but want emphasis to be different in different places. A respondent suggested need a realistic expectations of residents for places of habitation to evolve, and acknowledge 'matching what exists' as the only architectural responses isn't the viable choice. A respondent suggested protecting character of Conservation Areas. A respondent raised maintaining and enhancing character, and not ugly 'bog-standard' designs.
- A respondent felt need to state clear objective to improve people's quality of life.
- The PLA consider the vision must include references to the boroughs various waterways, including the Thames, and the role can play in combating climate change.
- A respondent felt vision should outline the most appropriate locations for new homes within or in close proximity to the designated town centres and public transport, including land either within or adjacent to existing built up residential areas where infrastructure such as good road access already exists – in particular suggest Richmond town centre and its surrounding residential hinterland is an appropriate location for further infill development and limited intensification / extension of existing established residential areas.
- Some respondents commented on the balance, or order, of priorities. There were comments on taking action and meeting climate change targets. Friends of the River Crane Environment (FORCE) raise concern that, even though the Council has adopted a Climate Emergency Strategy, there is a fundamental imbalance - the emphasis is on construction and development in the borough, with less emphasis on the need to improve investment, management and operation of the borough's green assets, and on investment in

pedestrian/cycleways to reduce road traffic, to mitigate the climate emergency. A respondent felt ordering the climate emergency before housing is likely to cause conflict with the Government Inspector. A respondent felt the ten objectives were right but overly ambitious, and would like to know which three will be the focus and for investment – some seem out of reach, key priorities – tackle air pollution, address traffic congestions/lack of residents parking, reinvigorate High Streets and protect the Conservation Areas. Some respondents supported housing, but others suggested a reduction of population to solve the housing crisis, focus should be on looking after communities, and avoid sacrificing to greedy property developers who put nothing back into local communities.

- Other priorities mentioned included Heathrow, rough sleeping, infrastructure e.g. health, schools, policing, street cleaning, roadworks.
- Some respondent felts the approach to preparing a new vision and Local Plan might lead to the unravelling of many existing and sound planning policies and designations, and questions (such as if there are parts of the borough to accommodate growth or encourage intensification) suggests well tried and tested protective policies could be set aside in favour of short-term economic and other objectives.
- Some respondents raised the use of technology in engagement and solutions e.g. Fix My Street app, post Covid-19 and continuation of cash economy.

Have we covered all the key issues and overarching challenges facing the borough in the ten themes above or is there anything missing?

Of respondents who answered the question: 14 said yes, 14 said no and 4 said don't know [6 did not answer the question]

- Individual respondents identified different specific issues that were missing, there was not general support for a specific topic or issue. The areas raised by each respondent included:
  - there has not been enough co-operation with Kingston and Hounslow Councils as they need to meet some of our unmet housing requirements and both have 'opportunity areas' next to the borough; this needs to be set out by the Council in accordance with the NPPF. Benefits to extra density, such as better shops, more night life, cultural institutions, and opportunities for business – provide jobs for a percentage of new residents.
  - there should first be scientific investigation whether the borough is a net producer of CO2, if so then priority should be given to planting/maintaining more street trees.
  - the Council needs to build social housing, and all contracts/changes work across cross borders (unlike current bike hire contracts).
  - introduce a quality of life / happiness measure for the borough to see the impact on people's overall feeling of well being.
  - a willingness to change minds e.g. policies on vehicle use and pollution ignore the cost of scrapping old vehicles.
  - over population.
  - need for specialist housing for older people and every home to be a lifetime home.
  - no children approaching secondary school age in North Kew have automatic access to any secondary school in the borough.
  - new bridge crossing opportunities (refer to WSP bridge feasibility report).
  - the housing market for people needing housing benefit isn't based upon the borough boundary but Broad Market Rent Areas – taking into account BMRA much of the 'shortage' disappears. Need to deal explicitly with an ageing population.
  - Port of London Authority consider the theme on increasing biodiversity must refer to green and blue spaces, recognising the importance of the River Thames as a key asset.

- increase the wellbeing of residents through addressing significant disruptions (noise pollution, traffic, air traffic) and refer to specific guidelines from WHO. Tackle increase in crime.
- cross-referencing the Disaster Management Plan.
- making our Village High Streets thrive, support independent traders, as people will switch to smaller more ethically sourced products over life of Plan. Is the space re-allocation radical enough?
- Importance of preserving Conservation Areas.
- A number of respondents did not have anything further to add, or did not know the details, or referred to responses in their previous questions. A respondent felt the Direction of Travel focused on too many things, which dilute resources, and should focus on three that will transform residents' lives.

In addition to our existing approaches of directing larger scale development to the borough's town centres, and expecting the majority of development on brownfield sites, where should we direct new growth in the borough?

- Many respondents supported the approaches towards town centres and on brownfield sites.
- Areas to direct new growth to were: flats in areas within walking distance of the new Crossrail 2 stations, near stations, atop car parks at retail parks or in place of retail parks, areas with high PTAL, Ham, reordering redundant retail spaces, inefficient supermarkets and out of town shops with large amounts of surface parking and low storeys e.g. Sainsburys at North Sheen, Sainsburys St Clares, Hampton and Tesco Twickenham (rebuild as multi storey with food retail on ground floor), underused sites with redevelopment potential or where opportunities for housing densification or intensification and or mixed use incorporating housing is possible, car parks around Twickenham Station (like Wembley, retaining parking and developing over), over Richmond Station (like at Twickenham Station). A response noted to await the suggestions to the Call for Sites. A respondent suggested need for a brief for sites such as Sainsburys at Hampton St Clares, Homebase in Hanworth, surface car parks at Twickenham Stadium, Kew Retail Park etc.
- The Mayor of London response also noted the approach directing office development to town centres (*see Increasing jobs and helping business to grow*). A respondent noted Covid-19 will further switch food distribution to on-line, so "superstores" will continue to decline.
- A number of responses linked the issue to public transport accessibility. Richmond Cycling Campaign stress all new developments should be car free, if PTAL is too low then the solution is to improve PTAL, and suggestion of an Active Travel Availability Level would compensate for a lower PTAL e.g. Stag Brewery – enough road space if prioritise active travel and public transport. The Ham & Petersham Neighbourhood Forum suggested major development should be in locations that with high PTAL and enabled to reduce car dependency. A respondent suggested small-zone CPZs should be introduced borough-wide to discourage commuter parking and unnecessary short trips within borough by car and prevent displacement parking by residents in new car-free/car-lite developments, and felt new housing should cater for those who cannot or do not want to live with a car and reduce car trips e.g. car club parking only, sustainable transport hubs.
- Some respondents felt there was nowhere else, or could not advise, with individuals commenting that it would alter the character of the borough and the focus should be on existing businesses and the quality of existing residents' lives, and brownfield sites should be exhausted first. A respondent felt existing policies did not direct development and decisions should be made on a case by case basis, particularly with the uncertainty caused by Brexit on economic, social and demographic conditions. A respondent felt growth plans should be deferred as a minimum by 5 years. A respondent suggested more car parking for shoppers/pubs/restaurant users and for large developments more electric charging points,

as well as more places for young adults and more sports facilities. A respondent felt there is no excuse for building on green sites and making the climate emergency worse. A respondent felt opportunities to build housing on brownfield sites has been lost (e.g. Wickes, new school and Lidl in East Twickenham) and sites that could have met the needs of ageing population (e.g. Brewery Lane, over Twickenham Station, Richmond Police Station). A respondent felt the borough needs to play its part to clean up the environment e.g. how hydrogen fuels will be delivered. A respondent felt the “majority” is not enough and encourages speculative planning.

### Should we continue to protect our green and open spaces from inappropriate development, or are there parts of the borough that could assist in accommodating growth?

Of respondents who answered the question: 29 considered that we should continue to protect our green and open spaces from inappropriate development, 3 considered that there are there parts of the borough that could assist in accommodating growth [6 did not answer the question]

- Many responses strongly supported the principle of protecting green and open spaces, as a valuable resource for residents and visitors and future generations. A respondent noted the wording of the question implied these spaces could assist in accommodating growth, and other parts of the borough must be identified. Richmond Cycling Campaign would like to see green spaces supporting active travel, there are opportunities to improve walking and cycling routes around and through the green spaces. The Department for Education referred to their comments on protecting open space and playing fields in line with the NPPF. A respondent noted inaccessible green land is valued for wildlife and biodiversity, and due to the climate emergency should be given the highest protection. A respondent supported protecting green space even if not regarded as high quality, as important to prevent unconstrained sprawl, although if relatively low quality and otherwise suitable for development, e.g. good transport links, could be released. A respondent felt we should have a 'grown up' conversation about Metropolitan Open Land and Conservation Area designation. A respondent linked green space provision to reducing demand on public health services e.g. Mortlake Brewery loss of community sports field and for pupils no green field playing area. A respondent noted London is the world's first National Park City. A respondent felt protecting the spaces is so important due to the climate emergency and vital for physical and mental health as demonstrated by the Covid-19 crisis. A respondent felt 'inappropriate' is too low a threshold which encourages challenges in planning, and should be 'all', as need stronger disincentives for speculative building, noting compulsory purchase order legislation is sufficient for genuine public need for building on green space e.g. infill in hospital grounds.
- Parts of the borough that could assist in accommodating growth mentioned were: large out of town retail centres and supermarkets, Fulwell Bus Station (redevelop with air-rights above, and land to increase the linkage between Fulwell Golf Course and Strawberry Hill Golf Course), Udney Park, Twickenham Embankment (restore lost car parking), Teddington High Street Telephone Exchange, Teddington Police Station, and areas by proposed new Crossrail 2 stations. A respondent felt if Ham/Petersham was better served by public transport there might be areas where increases in density and use of small plots would be viable.
- A respondent felt we don't need more people and quality of life has been dropping over the last years. A respondent perceived central Richmond, East Sheen, Mortlake, Kew and Barnes has not borne the brunt of housing (or affordable) development in recent years and development should be spread evenly over the borough.

Which areas of the borough do you think are capable of taking more growth than others, for example based on their proximity to town centres and stations?

- Areas mentioned: atop car parks at retail parks or in place of retail parks, at large food supermarkets and DIY superstores, at and near town centres and stations, extend Richmond Station like Twickenham Station, House of Fraser in Richmond, Ham, Whitton, and West Hampton.
- Areas mentioned as not capable of taking more growth: central Richmond, around Richmond Park, Ham and Petersham, East Twickenham.
- A respondent noted the frequency of services at stations is important. Some respondents referred to Crossrail 2. A respondent said town centres need more attention paid to the effects on wellbeing and service provision. A respondent suggested House of Fraser in Richmond for extra care housing for older people as close to facilities and would boost demand in local shops, cafes etc. A respondent suggested a catamaran service on the Thames, with space required for car parking allocated to innovative industries (e.g. vegetable growing in underground tunnels in Waterloo). A respondent suggested “Big Box” retail is becoming irrelevant and will disappear by 2030.
- Some respondents suggested none, and others referred to their responses to the previous questions.

Which areas of the borough may be suitable for more infill development and intensification?

- The following were mentioned: town centres (including Twickenham and Richmond), main road corridors, Richmond, empty shops, Mortlake Riverside, sites within 800m of train stations and town centres and Richmond Station.
- A respondent commented how large sites for infill and intensification can be allowed without building on gardens, in areas constrained by roads, railways and the river. A respondent felt there may be a need for a full land-use opportunity survey to identify underutilised land. A respondent commented on the need for a plan approached response, with the exception of ‘key’ Conservation Areas. A respondent felt the Council was the impediment to schemes coming forward and should identify sites and consult on what could be reasonably accommodated.
- Some respondents did not suggest any areas, some suggested none, or not in their area, and others referred to their responses to the previous questions.

Are there parts of the borough that could be transformed through larger scale development and encouraging intensification (for example redevelopment of existing single dwellings to blocks of flats)?

- The following areas were mentioned: parts of Richmond and Twickenham town centres, main road corridors, Richmond Station, Council owned buildings and car parks e.g. Whitton Community Centre and Old Deer car park, over railway stations, Ham, Ham Close, Whitton and West Hampton, Council housing estates, “Big Box” retail.
- A respondent felt with the number of empty shops in Richmond town centre may be reaching the point at which move towards mixed housing/retail is plausible.
- A respondent suggested where ownership is fragmented using compulsory purchase powers.
- A respondent felt this suggests the Council would be open to inappropriate development, in an urban rather than suburban setting – a short term view potentially destroying special “green” characteristics of the borough.
- A respondent noted most redevelopment would need to involve more than one dwelling to create an acceptable outcome, and that the majority of single dwellings in large plots have heritage value. A respondent felt the challenge is the impact on the character of an area, subdivision of large houses into flats increases density without an impact on appearance,

and an alternative form of intensification is home sharing / intergenerational living where couples/single people provide accommodation in their homes to others, sometimes in exchange for support/company/transport.

- Some respondents did not suggest any areas or suggested there might be parts of the borough but did not identify them. A respondent felt we do not need more people, due to pressures on parking, school places. A respondent said not in East Twickenham. Some respondents referred to their responses in the previous questions. A respondent felt this would be for the worse, opposing flats. A respondent questioned whether it is desirable. A respondent felt high rise developments in the 1940/50s e.g. at Roehampton led to isolation and vandalism, and developments should be no more than 4 storeys with green areas and proper management. A respondent noted the Covid-19 pandemic should teach us that intensification is to be shunned.

Would you like to see individual policies and strategies for each of the different parts of the borough (such as Twickenham, Kew, Barnes, Hampton and Hampton Hill etc.) and if yes, how could they vary? Of respondents who answered the question: 19 said yes, 3 said no and 9 said don't know [7 did not answer the question]

- Some respondents felt we already had an area based approaches, whereas some respondents thought there was a current 'one-size-fits-all' policy.
- Many respondents indicated some support for area based approaches. A respondent felt it was better to have a coordinated approach. A respondent was in favour of decentralisation, but also a borough identity. Some respondents noted these are useful for areas anticipated to undergo significant change and the need to base on the revised population growth (or shrinkage). A respondent noted the pros and cons of the approach. A respondent raised a need to remove the view that certain areas are entitled to protection where others are less valuable so can be built on intensely, as creates pockets of poor areas; should not have areas of privilege.
- Many respondents referred to the existing Village Plans. A respondent felt policies can vary based on those. A respondent felt area based strategies essential if those are discontinued. Others noted an area based approach can build on them.
- The Ham & Petersham Neighbourhood Forum response felt having developed area specific policies as a valuable way of identifying issues and objectives in a local area, and noted the need to cooperate across local areas and boroughs. A respondent also noted in reality people use services, travel and move home across the borough. A respondent said it is impossible to draw precise boundaries.
- Regarding how strategies could vary, most respondents noted how areas vary in their characteristics, historic interest and geography, and there would be differences and opportunities. Noting areas have distinct personalities which local people know well, and differences should be preserved. Respondents felt some areas are closer to being metropolitan centres e.g. Richmond, Twickenham and other places are more suburban commuter towns e.g. Teddington, Whitton – a suggestion to protect the quietness of Whitton and Hampton Hill as a part of their fundamental character. A respondent noted these should not just be about where housing is built, e.g. ask about protected cycle path routes. A respondent noted the different needs e.g. Richmond's flourishing traffic-free riverbank could never work in Twickenham with its working riverside. A respondent noted e.g. Hampton Hill and Ham more problems with crime and anti-social behaviour, Twickenham impacted by proximity of Rugby Ground and St Mary's. A respondent felt required for East Twickenham as an untapped opportunity, to develop the high street and make it practical for pedestrians and a better place to live, and to reinforce conservation area protection and develop heritage assets. A respondent felt they should focus on keeping communities and individual business thriving. A respondent felt these should be tailored to

retain the heritage of each area, such as defend the abundance of green spaces such as Barnes Common, The Wetlands, Leg of Mutton, Barnes Green with its pond, the Tow Path, and protect Mortlake as a historic site.

- A respondent commented on the lack of investment in Twickenham (roads, shop fronts, litter, lack of doctors appointments) and yet more people being crammed into the area, conversely Richmond centre not showing signs of wear, clean streets, so clearly investment is being made, and asked why this is. A respondent referred to the need to protect all green spaces. Other issues mentioned include the PLA consider the need for a specific policy on river corridors, need for a boroughwide approach to fly tipping.

Can you suggest any other ways we could accommodate future growth and new development, ensuring support for sustainable communities?

- Other ways suggested were: if service roads behind shopping parades/town centres adopted then converting maisonettes above shops into flats, opportunity areas and sites in the Ham & Petersham Neighbourhood Plan, building above offices in business parks, large shops, council owned buildings like community centres, building Council houses, footbridges (support second stage WSP report), developing office space into housing.
- Some respondents referred to changes due to the Covid-19 pandemic. A respondent noted office space will come through businesses closing. Some noted the increase of home working will continue. A respondent noted decline in historic manufacturing and will rely on technological innovation and specialist manufacturing alongside financial services elsewhere. Some respondents noted we should concentrate on developing green spaces and carbon free developments, leading a green economic revolution.
- Some respondents did not suggest any other ways. Some respondents answered no, there should be no more people, houses and stop talking about growth. A respondent referred to protecting local high street independent traders, business rates relief. A respondent referred to reducing business rates, improving road and pavement surfaces and more car-parking. A respondent referred to promoting walking, public transport and cycling, and stopping use of cars. A respondent suggested changing Broad Market Rent Areas. A respondent felt need to cooperate with Hounslow and Kingston Councils regarding office space and employment priorities. A respondent questioned on what premise growth planning is taking place e.g. anticipated increase in secondary school places at Mortlake shown to be wrong, and suggested research with universities to establish if competitive. Some respondents referred to their responses in the previous questions.

Overall officer comment on responses to 'Scale of the challenge, opportunities and setting the Direction of Travel'

The majority of responses mentioned the challenges and opportunities that the Council had set out in the Direction of Travel, with the most comments on the key areas like climate change, active travel, green infrastructure and the built environment. Some commented on the balance of priorities, whether these all could be achieved, with different views in both directions e.g. whether the borough is overpopulated or growth is an opportunity, whether there should be more or less parking. There was general support for the approaches towards town centres and on brownfield sites, with some support for developing area based approaches, and strong support for the principle of protecting green and open spaces. Many respondents raised particular priorities, issues or sites that are important to them, and some of these ideas and issues, including those that were not mentioned in the Direction of Travel, are beyond the remit of planning policy e.g. in relation to Heathrow, finance. Some responses did pick up the potential changes arising from the Covid-19 pandemic.





### Responding to the climate emergency and taking action

Do you agree with the proposed policy directions? If you disagree with any of the policy directions, please tell us more.

Of respondents who answered the question: 18 said yes, 6 said no and 5 don't know [9 did not answer the question].

- Welcome and majority support for the recognition of the climate emergency
- Three people felt that there is no climate emergency in the UK
- Transport is the main source of greenhouse gas emissions and restricting car use is the best way to tackle it
- Others said stop demonising the car
- A quicker response to the emergency is required
- Not strong enough in protecting Biodiversity and Green Space.
- There appears to be a non-existent inspection regime for ensuring that things like green walls and roofs are correctly installed and maintained.
- The policies lack any proposals for managing and enhancing open spaces
- Concern over flood risk assessments and basement developments

### How can we promote high quality sustainable development as part of a new Local Plan?

- Use the borough's waterways as part of the transportation of construction materials and waste to/from development sites.
- The cost of low carbon energy sources is too high.
- Insist on zero carbon for all developments, not just large scale.

### How can we continue to set out a pathway to zero carbon?

- Planning and building refurbishments should meet strict criteria and be ENFORCED.
- Don't bother, it's impossible to achieve.
- Should plan to remove CO2 from the atmosphere.
- Discourage car travel/diesel vehicles: look to electric transportation
- Better roads that allow traffic to get through more quickly.
- Free public transport for all.
- Fight Heathrow expansion and build sustainably.
- More battery charging points provided quickly.
- Encourage the development and expansion of decentralised energy networks
- Encourage greater use of alternative energy.
- Several respondents set out various technical solutions (many were akin to those in the Sustainable Construction Checklist)

### How ambitious shall we be in requiring zero carbon standards for all developments?

- Totally/ 100%/very ambitious
- Council should be using money to help existing residents become more energy efficient.

- Set out a clear path to zero carbon standards for all developments, subject to viability and effectively monitor their implementation.
- New builds will need to be treated differently to older property
- There were three dissenting voices who thought the ambition was a mistake.

#### Are there other planning means to mitigate and adapt to climate change that you want us to pursue?

- The globe is entering into a dangerous climate cooling phase.
- Stop concreting of front gardens & allow rainwater to escape/ removing tarmac verges and replacing them with grass.
- Go to Zero Carbon as soon as possible for the Council and for all residents, businesses and premises
- No expansion of Heathrow
- Review the Pedestrian and Cycle Bridge Feasibility Study of October 2018 and commission the next stage report.

#### Are there any other climate change and/or sustainability issues that you would like the new Local Plan to address?

Of respondents who answered the question: 17 said yes, 3 said no and 3 said don't know [15 did not answer the question]

- Need a spoke of cycle routes leading out of the town centres into their catchment areas.
- Explicitly include the sustainability “proximity principle” into the local plan, thereby leading to less need to travel
- More, and compulsory recycling
- As transport is the largest emitter of greenhouse gases, the borough should encourage car-free/car-lite development and advocate and enable a shift in travel behaviours to more sustainable modes of transport: walking, cycling and clean public transport.
- Make working from home easier/have adequate broadband in place
- Acknowledge the value to the environment of back gardens / back lands both as habitats and as wildlife corridors
- Need to make the various railway tracks SINC, this will also help prevent the loss of habitats caused by Network Rail selling land adjacent to railway tracks to neighbouring homeowners.

#### General comments

- Some believe the policies in the current Local Plan adequately cover climate change and air quality issues
- Many suggested solutions were transport based e.g. low carbon and electric vehicles.
- SuDS was identified as a possible solution for flood risk and ground water flooding
- One respondent identified the development of Ham as likely to increase pollution and lead to loss of green space

Overall officer comment on responses to ‘Responding to the climate emergency and taking action’  
There was, in the main support for the policy direction. The majority of the solutions put forward related to transport and travel. Several comments reflected the desire for more management of green spaces, monitoring, stronger environmental protections and more urgent implementation of the actions, i.e. before 2024.



### Delivering new homes and an affordable borough for all

Do you agree with the proposed policy directions? If you disagree with any of the policy directions, please tell us more.

Of respondents who answered the question: 10 said yes, 9 said no and 6 don't know [13 did not answer the question].

- The Mayor of London response emphasises the need to aim to exceed the new London Plan housing target, including for small sites, and beyond 2029 the proposed target should be based on a combination of the GLA SHLAA and local up to date evidence. Welcomes the intention to undertake a Local Housing Needs Assessment (which should be based on the government's standard method) including to understand tenures, housing for the elderly and the needs for different sizes of dwellings. Notes the Mayor will lead a London-wide Gypsy and Traveller accommodation needs assessment.
- The Spelthorne Borough Council response notes housing is a strategic and cross boundary issue. Every effort should be made to meet local housing needs within the borough and support use of up to date evidence to inform options. Richmond should look to Greater London to assist in meeting needs if unable to do so alone. Spelthorne estimate will only just be able to meet their standard method housing need figure, which is the starting point for determining the number of homes needed. Further Duty to Cooperate discussions will be held. Another respondent also highlights the need to co-operate with neighbouring authorities to meet unmet demand, suggesting potential for joint developments in the Kingston and Hounslow opportunity areas.
- Some respondents support delivering new homes (and more affordable homes), against the London Plan target (and a potentially higher emerging target) and the Government's objectives, and broad support for the overall Direction of Travel on housing. Support for making efficient use of land, promoting the consolidation and intensification of large underutilised sites or those unviable for continued use, brownfield sites, including site allocations and undertaking a boroughwide Urban Design Study. However, some respondents concerned that the housing targets are too high and we do not need more homes or people, as the borough is overpopulated. A respondent felt the character and heritage is important and would not wish to see increase in density or height above existing. A respondent was not in support of using existing MOL/Green Belt for new homes. It was noted the commitment to undertake a local housing needs assessment. A respondent felt the section did not set out a policy direction other than meeting the housing targets.
- Many comments noted the implications of growth and additional housing on other needs, particularly social infrastructure such as education facilities, transport, and there should be a commitment to increasing the delivery of green spaces and playspace in terms of the quantum and quality. Specifically FORCE also note the pressure of increasing building heights on views and vistas from open spaces and dark river corridors in the borough, and their opposition to development compromising this and suggest the absence of visual intrusion to all users of open space should be recognised as a public benefit. A respondent felt expanding schools would be an efficient use of infrastructure, rather than new facilities.

- Some respondents referred to specific sites and areas, including the need to ensure housing sites did not displace parking, and for an evidence base to assess the balance in central Richmond between residential, retail and office use, for area based policies to allow buildings to return to their original use outside the core area. A respondent suggested the Harlequin's site and the Twickenham Centre Depot site can make a significant contribution; a respondent put forward the Greggs site (see also Call for Sites). A respondent referred to the London Plan Good Growth by Design, so housing delivery should be sensitive to the local context and accessibility, such as in Ham & Petersham. A respondent felt small sites are an essential component but important development respects existing style.
- Some respondents referred to specific types of housing. A respondent suggested the gap in the middle needs to be addressed, and suggested discounted market sales and alms houses should be explored. TfL Commercial Development welcome the potential of Build to Rent. Some supported providing housing for single persons. A respondent supported specialist housing for older people such as extra care, to encourage people to move from under occupying large family homes there is a need for well-located accessible units with communal facilities. A respondent supported building for a range of household types. A respondent referred to removing the CIL difference between C2 / C3 to prevent incentive to developers to deliver tenures not based on social need.
- Some respondents referred to other priorities such as walking, public transport and cycling, and should not provide parking spaces, that growth plans need to be revised in line with more aggressive climate change models, and use of the river and emergency planning.

#### What do you think are priorities for the type and size of new dwellings?

- Some respondents supported a range of flat and house sizes, it was noted this creates a mixed community. There was support for flats as a priority but at the opposite end there was support for building small and large houses. It was noted to await the results of the housing needs assessment to be informed of the trends.
- Some respondents supported affordable housing needs (social housing, for rent and homeownership), and the tenure mix secured needed to be enforced, while others felt the focus should be beyond the needs on the housing register.
- It was recognised that the type and size was linked to whether suitable for young people, families etc. A respondent noted overcrowding with families living in small flats. A respondent felt young adults are struggling to access the housing market and are not on the housing register, which may be showing demand for family housing is more pronounced than it actually is. Some respondents noted the need for extra care, accessible homes.
- A respondent noted larger dwellings have always been a part of Richmond's history. A respondent noted in densely built areas for new neighbours to welcome new small sites it's important they respect the existing scale and style.
- A respondent noted there should be no new luxury dwellings of any size.
- Some respondents reiterated their view opposing any new dwellings and referred to other priorities such as transport, zero carbon, pre-fab buildings.

#### Could other forms of housing assist with meeting local needs?

Of respondents who answered the question: 12 said yes, 3 said no and 6 said don't know [17 did not answer the question]

- Some respondents identified the need for more student housing as well as supported housing for the homeless.
- Other types of homes mentioned included social housing, shared housing, Council houses, empty shops or unused buildings near town centres, alms-houses for older people, community-led housing and self- and custom-build.

- It was also noted where new developments are not possible that residential areas on main roads should be redeveloped. A suggestion for higher density new transportation hubs.
- A suggestion was made for a new form of housing; co-working, which would provide bedrooms for young adults to rent, communal working/living space and a garden area.
- It was noted to await the results of the housing needs assessment, and a respondent referred to their response to earlier questions.

Would you support housing delivery from small sites, if it is of good design and contributes to local infrastructure?

Of respondents who answered the question: 19 said yes, 4 said no and 2 don't know [13 did not answer the question]

- A respondent supported provided tall buildings are not sited on small sites, there should be a maximum limit on height and density.

What other ways could help deliver more affordable housing, in the right locations, given land values and property prices in the borough, and recognise the wider community benefits it brings?

- Overall strong support for prioritising affordable housing (including for rent) due to high property values and the lack of affordability, to provide an inclusive community, and above other contributions.
- The Mayor of London response welcomes the intention to seek 50% affordable housing and sets out the Local Plan should reflect the Threshold Approach (as set out in the London Plan) to limit those circumstances where viability evidence is required, by providing an incentive for developers to achieve the minimum level of affordable housing thereby avoiding scrutiny of viability. If setting a threshold higher than 35% this should be based on viability evidence.
- A respondent also supported a robust approach to understanding viability evidence, and the need for a pragmatic approach given competing interests such as delivering social infrastructure.
- There was support for making efficient use of land. It was suggested there is particular scope for sites owned by the Council and Richmond Housing Partnership to review land use, such as additional infill, residential above, and converting existing roofspace to provide new units. A respondent recognised this was linked to finance, and a respondent suggested this needed a 10 year strategy.
- A respondent noted the Plan should distinguish between brownfield and greenfield sites as greenfield land has lower associated development costs.
- A respondent noted models where a discount is maintained in perpetuity such as restrictions on staircasing, enable more recycling of affordable housing. A respondent suggested the Council start building new council homes directly or set up a property company. A respondent suggested changing Broad Market Rent Areas may enable people to access more housing options. A respondent suggested co-working/living schemes can offer an affordable option. A respondent referred to the Community Led Homes toolkit. A respondent suggested CPO of empty properties. A respondent supported meanwhile housing. A respondent supported prefabricated building. A respondent referred to removing the CIL difference between C2 / C3 to prevent incentive to developers to deliver tenures not based on social need.
- Some respondents suggested particular development sites to deliver affordable units.
- Some respondents referred to other priorities such as parking, overcrowding.

Overall officer comment on responses to 'Delivering new homes and an affordable borough for all'  
 On overall housing delivery, there was support for the approach set out in the Direction of Travel, however while some respondents support delivering new homes there are others who feel targets

are too high and the borough is overpopulated. The impact of housing growth on infrastructure and facilities was noted.

There was a range of views on the priorities for the type and size of new dwellings, suggesting support for a range to provide for mixed and balancing communities, to be informed by the outputs of the Local Housing Needs Assessment. Some suggestions for other forms of housing to assist with meeting local needs were mentioned, including shared houses, student housing, self and custom build.

There was strong support for increasing affordable housing delivery, and ways to understand viability. Overall there were some ideas for making more efficient use of land, and some specific suggestions for how to increase delivery of affordable homes, however some of these are beyond the remit of the Local Plan.



### Shaping and supporting our town and local centres as they adapt to changes in the way we shop

Do you agree with the proposed policy directions? If you disagree with any of the policy directions, please tell us more.

Of respondents who answered the question: 15 said yes, 3 said no and 5 don't know [15 did not answer the question]

- Strong support for town and local centres and proposed policy direction. Support for self-sustaining borough where shops and services are available locally.
- Some support for more flexibility for change of use (including housing) in peripheral parts of centres provided that loss of retail would not change the character of the local centre.
- Encourage redevelopment of out of centre developments.
- Support for sustainable transport to get to town centres and for pedestrianisation.
- Some support for protecting ancillary retail space and servicing.
- Promote mixed use development, encourage other businesses in underutilised shops.
- Approach should take into account the pandemic and impact of lockdown.

Do you agree with the spatial strategy proposed? Should major development be encouraged equally amongst the five town centres? Or should for example, Richmond and Twickenham be the appropriate location for the majority of any new retail floorspace?

Of respondents who answered the question: 12 said yes, 5 said no and 5 don't know [16 did not answer the question]

- Overall, strong support for the spatial strategy proposed and focus on the five town centres. All five centres need a good range of shops and services. RB Kingston felt that major development should be allocated as per the role and function of the centre in the hierarchy.
- Some felt that the larger centres of Richmond and Twickenham should accommodate major/most development. Whitton and Teddington mentioned as not having capacity to

accommodate it. However, several respondents considered that development should be spread more evenly across centres.

- Too much retail space, greater flexibility needed. Support for housing on edge of centres.
- Take into account impact of pandemic.
- Businesses should be encouraged anywhere and parking made available, but encourage near stations.
- No mention of retail parks

Does the existing hierarchy categorise borough centres correctly? Are there too many local centres and parades in this defined centre hierarchy? Local centres, neighbourhood centres and parades are relatively well spread across the borough. However, should we reduce the number of centres in the hierarchy, and/or reduce the amount of/or completely remove designated frontages in some, taking into account their role in meeting local need?

Of respondents who answered the question: 14 said yes, 7 said no and 3 don't know [14 did not answer the question]

- Overall, strong support for the existing hierarchy.
- The Mayor of London commented that the strategic approach should reflect the town centre network in the Intend to Publish London Plan including the night-time economy classifications<sup>1</sup>.
- Encourage growth of/ support for local centres. Contributes to reducing need to travel and supports sustainable transport choices (as advocated by RB Kingston). Smaller centres and parades, such as Ham Parade are also important and help to maintain community cohesion.
- Allow flexibility to change uses (including to housing) where centres in decline and in more peripheral locations. Redevelop parade in Ham Street.
- A respondent felt that more areas should be designated as key retail in smaller centres like Whitton.
- A respondent felt the market should dictate where businesses go.

If the evidence supports a more flexible approach to retail policies what other uses should be encouraged?

- The Mayor of London suggests the approach should reflect the changing retail environment and general decline in retailing in the capital. Specifically, that the types of uses identified in the ITP London Plan as being acceptable in town centres, including office development, residential, social infrastructure, cultural uses and leisure uses, should be considered acceptable in borough town centres.
- Approach should await outcome of research.
- Some wished to discourage relaxing retail planning policies and reducing the importance of shopping frontage policies. Ensure no loss of retail since last review.
- Protection for Post Offices and shared bank services.
- Review decommissioned and redundant sites in centres and larger shed sites.
- Other uses to be encouraged include:
  - strong support for community uses such as youth clubs, new libraries and health and wellbeing businesses/gyms, specifically reinstatement of police station in Ham. RB Kingston supported the co-location of facilities.
  - cultural and social uses such as art galleries, performance spaces and permanent market pitches, as well as facilitating enjoyment of the Thames and environs (advocated by the PLA);

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<sup>1</sup> Twickenham and Teddington are identified as having important areas of night time economy which are of local significance and Richmond is a more substantial area of regional or sub-regional significance.

- café culture and drinking establishments (supported by the Environment Agency)
- service uses such as physiotherapy, osteopaths, spas, beauty shops – rather than residences; and
- offices, including flexible and bookable office/work space and shared workspace
- uses which can co-locate.
- Discourage retail parks
- Continued engagement with commercial agents requested.

Café culture could be encouraged and/or the night time economy. Are there some centres where this would be preferable? Should we be flexible in terms of mixed A1/ A3 uses? Existing policy currently restricts further entertainment uses such as cafes and restaurants, drinking establishments and takeaways for specific frontages in parts of centres where there are overconcentrations of such uses– should it continue to do so? Are those areas still appropriate and should other areas be considered? If so, which ones?

- Many respondents felt there were too many cafes. Some did support café culture (the Environment Agency), especially if they could function as part of shared workspace.
- Concerns were raised that the relaxation of planning and licensing controls could lead to an increase in the negative impacts of the restaurant and bar sector including anti-social behaviour, smells and noise, particularly in relation to nearby residential property.

The borough could potentially lose around a third of its office stock as a result of the government's introduction of permitted development rights allowing change of use from office to residential. Uptake has already affected the availability of office stock in the borough and impacted negatively on the local economy. Should policies identify parts of town and local centres where offices could be encouraged to contribute towards increasing office provision?

- Offices should be encouraged, including flexible and bookable office/work space and shared workspace. Provision of less formal meeting spaces for homeworkers.
- Encourage flexibility for change of use between office and residential in town centres but not predominantly residential areas.

Is there more scope for further community uses in centres, potentially even in key retail areas?

See in list above.

- Strong support for a range of community uses including cultural and art facilities, health-related services and libraries etc

Would housing, including residential on upper floors, work if located next to other (potentially noisy or smelly) uses in centres? Where might a relaxed policy to encourage more housing apply? Should it, for example, apply in designated frontages?

- Mostly support, including RB Kingston, for more housing on upper floors in town centres, particularly for lone/small households.
- Support for housing on edge of centres, in more peripheral locations.
- There were opposing views on whether housing should be acceptable in in designated frontages.
- Prepare evidence to help to assess the balance in central Richmond between residential, retail and office use.
- Develop specific policies to return buildings to their original all residential use especially in non-core areas such as Hill Rise/Richmond Hill.
- Agent of change principle raised. New developments should not lead to bars and clubs being forced to close – unless the noise they are making is already unreasonable / illegal.



- Issues such as noise and smells can be controlled by the planning process, engineering and acoustic segregation. Some may wish to accept disturbance to live in a central location.
- Housing and offices should be separate.
- A respondent felt more housing not supported as insufficient infrastructure available.

In terms of developing centre strategies and visions, what should they include? How should these relate to local and wider transport accessibility? Your views in relation to specific centres are welcomed.

#### Strategies and vision:

- Connectivity, viability, place making and architectural delight.
- Support for sports facilities and reinstatement of ice rink.
- Research needed before approach can be justified - retail policy relaxed and controls relating to night-time and evening economy reduced.
- Abolish business rates to rejuvenate centres
- Provide more business space to discourage commuting to Central London.
- Investment in Heathside including Council support for re-opening of public house.
- In relation to Whitton town centre: redevelop telephone exchange to extend centre and provide extra shops and offices.
- East Twickenham: policies to be in accordance with Village Plan where still relevant, taking into account historic assets. Budget to be provided for high street improvement.

#### Transport accessibility:

- Support for pedestrianisation of town centres – they should be people-focused rather than car-centric.
- Review public transport, ensure coordination between different modes. Encourage pedestrianisation and remove onstreet parking in appropriate places.
- Each centre should have good quality and safe cycle routes planned and adequate cycle storage near all stations.
- Several respondents felt car parking was needed.
- Reduce journeys to school by car.
- Specifically consider Ham & Petersham which is most inaccessible in terms of transport.
- Developing Ham will decrease open space and lead to dangerous and polluting increase in road traffic.

Should the amount of key shopping frontages be reduced and/or should secondary shopping frontages (where some change of use is already allowed) also be reduced or removed altogether? Do we need to protect shopping in just the core areas which correspond with designated key shopping frontages? In the past a compact retail core was thought to foster comparison shopping (i.e. for those goods that people tend to go to several shops to compare products and prices before buying them, such as electrical household items, clothes and shoes).

- Most respondents objected to relaxation of retail policies and loss of control over change of use. Need for some shopping is recognised, especially for the more vulnerable. Support for local centres, including their community value, and current spread of shopping, with several respondents feeling that it was necessary to increase the spread to reduce travel. RB Kingston felt that the amount of designated frontage should not be reduced unless justified by market signals.

- Some support for more flexibility also:
  - Less important to have a retail core because comparing products carried out online.
  - Less retail and more community and business space needed.
  - A strategic approach to reducing retail should be employed rather than just letting it wither.
  - The market should decide how much shopping is needed.
  - Reduction in retail needed specifically in Ham Street/Ashburnham Road
- Further research needed to support an appropriate approach. Policy should be reviewed, but not taking a pre-determined view that the number of shops should be decreased.
- Need for high quality shop fronts.
- Some closures relate to landlords' decisions.
- Concern that deliveries from online shopping are increasing road use and that rationalisation and coordination of deliveries is needed.
- Continued engagement with commercial agents sought.

Should the 'key shopping area' relating to the operation of permitted development rights continue to be both key and secondary frontages?

Of respondents who answered the question: 6 said yes, 2 said no and 10 don't know [20 did not answer the question]

No clear view on this technical matter.

Is it appropriate to continue to protect local top up shopping facilities?

Of respondents who answered the question: 20 said yes, 1 said no and 5 don't know [12 did not answer the question]

Should this protection only extend to food shops and/or some selected types of businesses?

- Overwhelmingly, respondents felt that food shops should be protected, a view supported by RB Kingston and the Environment Agency. Some felt that protection should apply to all local shops to support the community and to reduce the need to travel.
- A respondent felt the market should decide.

Should we continue to provide additional protection for shops selling essential goods and Post Offices generally?

- With one exception, all respondents felt additional protection was still required, as they were important for the community, especially the elderly, those with small children and the disabled.
- A respondent felt that protection could be extended to specifically cover banks.

Is 400 metres an appropriate proxy for easy walking distance?

- The majority of respondents felt that 400 metres was still an appropriate proxy for easy walking distance. However, some felt the distance was too long, and others too short. Other distances suggested ranged from 300 metres to 800 metres.

Do we need to continue to protect pubs as strongly? Some pubs that do not have a food offer are struggling to stay open, despite their potential value to the community.

Of respondents who answered the question: 14 said yes, 8 said no and 3 don't know [13 did not answer the question]

- The majority of respondents supported the continued protection of pubs, mainly due to their community value. Related to this, several respondents felt that policies should seek to

enhance this community value, acting as social hubs and potentially to encourage the food offer.

- A small number felt that pubs were no longer needed due to changes in drinking habits and should be converted, including to residential. That the local community should be given the chance first to support the pub.
- A couple of respondents referred to landlords trying to circumvent marketing requirements to gain permission for change of use from pubs.

#### Are the locally set thresholds for impact and sequential tests still appropriate?

Of respondents who answered the question: 4 said yes, 3 said no and 13 don't know [18 did not answer the question]

- Thresholds which are set should be backed by evidence.  
*[there were other comments which did not relate to the issue]*

#### How long should shops and pubs be marketed before a change of use is allowed if the proposal is contrary to policy?

- Opinion was divided on this issue. However, many felt that the marketing period was too long.
- The marketing period should differ between land uses. For example, a respondent suggested that for pubs, the period could be 5 years whereas for shops, suggestions ranged from 2 months to 3 years.
- The community should be consulted on what is the appropriate marketing period for their areas.

#### Should a policy be developed for redevelopment of existing retail parks/stores in less central locations?

Of respondents who answered the question: 15 said yes, 4 said no and 4 said don't know [15 did not answer the question]

- The vast majority of respondents were in favour of redevelopment.
- Many considered such sites as encouraging car use and being wasteful of space and capable of delivering housing and other land uses including office. Support for mixed use schemes.
- A respondent felt the market should decide and no policy is necessary, whilst another felt that a policy is needed to ensure proposals are appropriate in terms of height of buildings and provision of green space and social infrastructure.
- CPRE considered such sites are viable and much more sustainable alternatives to Green Belt.

#### Overall officer comment on responses to 'Shaping and supporting our town and local centres as they adapt to changes in the way we shop'

Respondents were generally in favour of the policy direction proposed. As indicated by previous consultations, the borough's centres are clearly valued. There is support for more flexibility in change of use, with a wide range of potential land uses suggested including housing, but also clear support for accessible local shops and services. Support also for the spatial strategy and hierarchy of centres and principle of meeting local needs in walking distance of residents' homes. Retail parks recognised as providing scope for redevelopment and making a more efficient use of land.

Respondents recognised that this is a time of change for centres. The need for robust research is highlighted to inform the approach taken, in particular, to take account of the impact of the pandemic on shopping patterns.



### **Increasing jobs and helping business to grow**

Do you agree with the proposed policy directions? If you disagree with any of the policy directions, please tell us more.

Of respondents who answered the question: 17 said yes, 1 said no and 2 don't know [18 did not answer the question]

- General support for retaining employment uses in the borough, including large housing schemes also providing workspaces, or making a contribution to off-site workspaces.
- Need to ensure Richmond continues to be a place of employment and encourage shift towards less commuting.
- More focus should be on live-work settings.

### **Should we continue to protect our industrial-type uses?**

Of respondents who answered the question: 17 said yes, 1 said no and 2 don't know [18 did not answer the question]

- The Mayor welcomes Richmond's intention to conduct an up to date Employment Land Review and carry out an industrial land audit.
- Embed the guidance on industrial intensification and co-location in Policy E4 and E7 of the London Plan into the Local plan
- The PLA supports the intention of the policy directions to establish the Agent of Change principle into policy
- There is a danger of misreading the market about industry use not being in demand and replacing it with distribution.
- continue to protect business premises but add new small low-cost premises instead of or as well as retail units at the bottom of flats.
- the (national) direction of travel is away from manufacture

### **Should we take a proactive approach and encourage intensification, or adopt a more locally distinctive policy in this regard that focuses less on introduction of residential on industrial sites, but that encourages further industrial / employment uses?**

- Most said that industrial / employment uses should be encouraged and given priority over residential uses on site
- It is essential that Richmond continues to be a place of employment not just a dormitory; more local jobs will help us improve the environment, cut commuting and pollution.
- Richmond should adopt a more locally distinctive policy that focuses less on introduction of residential on industrial sites.
- One respondent stated that it would be a start if you weren't trying to reduce industrial use by making the Embankment traffic-free. No existing businesses can survive without collections & deliveries. Local trades-people will lose work because they can't park vans.
- A respondent said "No", you should build flats above business premises -more efficient land use, employees and customers on site

### Should we continue to specify flexible small-scale units suitable to meet local business needs?

Of respondents who answered the question: 17 said yes, 1 said no and 1 don't know [19 did not answer the question]

- Limited responses to this question, although general agreement in yes/no question (see above).
- Three respondents referred to the importance of small-scale units to the borough, with one respondent commenting that the Council should “stop forcing them out of business”, and another stating that the proximity to Heathrow may mean larger sites are often used for freight and may not employ many people/provide lower quality jobs.
- Small-scale units could be provided at the bottom of flats instead of retail.

### What priority should we give to employment uses over residential amenity if at all? For example a business park may be underutilised due to neighbours' objections to potential transport impacts.

- Depends on the individual circumstances, case specific
- Employment uses should be given priority
- None, they can both be built at the same site
- focus on restricting the really disturbing activities, rather than shutting the whole site.
- Only one respondent said residential amenity should be given outright priority while others said it was a balancing act.
- DP9 on behalf of London Square Developments suggest the former Greggs Bakery site (see also Call for Sites) is not suitable for continued employment use, raising potential for harm to amenity of surrounding residents.

### What type of sites, buildings and facilities are most needed to support the borough's office occupiers, in particular its small and micro businesses, as well as those working remotely from their usual place of work?

- Support for low rents and shared spaces with flexible rental periods mentioned by four respondents (example given of The Space in Teddington). It was noted that current provision is often expensive and lower cost space could be provided in public buildings such as libraries and town halls. Noted impact of loss of small business space above shops on supply of office space (example given of Whitton).
- Other spaces suggested by respondents included existing vacant buildings, spaces above shops, historic buildings and decommissioned places of worship
- Different respondents stated car parking was required and was not required.
- Good broadband provision needed to support home working.
- Respondent from the Ham and Petersham Association commented that local small offices are not all centred on small number of locations.
- Flexible office space is key. Lesson from CV-19 is that we don't all need to herd into Central London 5 days per week -more flexible local office space would make a big difference to carbon footprint and quality of life. (This response was under question above but seems more appropriate here)

### Should we encourage and protect river-related business?

Of respondents who answered the question: 17 said yes, 0 said no and 2 don't know [19 did not answer the question]

- General support for river-related businesses providing employment and contributing to the borough's character.
- One commented that there was a lack of support for river-related businesses in the past.
- PLA welcome continued protection of river-dependent facilities, which is supported by the emerging London Plan and the PLA's Thames Vision.

General comments

- Mayor of London refers to policy E1 of Intend to Publish London Plan which directs new office development to the borough’s town centres and notes that Richmond town centre is identified as being suitable for both speculative and mixed-use office development and Twickenham identified for having potential for mixed-use office development. The existing small office capacities in East Sheen and Teddington should be protected. Richmond should clearly differentiate its approach towards industrial and office development.
- For one developer, delivery of housing was seen to outweigh the need to protect inappropriate sites for continued employment use.
- Richmond is an attractive location to large and small-scale businesses and the encouragement of small businesses, start-ups and the like is important.

**Overall officer comment on responses to ‘Increasing jobs and helping business to grow’**  
 There was support for retention of employment/industrial and for Richmond to adopt a more locally distinctive policy that focuses less on introduction of residential on industrial sites. More local jobs will help us improve the environment. However, for one interested party the delivery of housing should be a key priority in the new vision for the Local Plan.  
 It is worth noting for this section, of the respondents answering the yes/no questions, most were in favour of the proposed policy approaches.



**Protecting what is special and improving our areas (heritage, culture and open land)**

Do you agree with the proposed policy directions? If you disagree with any of the policy directions, please tell us more.

Of respondents who answered the question: 20 said yes, 2 said no, 2 said don’t know and 1 agreed and disagreed [12 did not answer the question]

- Prospect of Richmond responded that current policies offer adequate protection for heritage, culture and open space – concern that Direction of Travel seems to relax controls that already exist. Support Direction of Travel in encouraging visitors and tourist. Help residents to maintain heritage and culture of central Richmond, the Riverside and the Green, for own benefit and for wider community and visitors.
- Disagreement that Village Plans should be discontinued as they enabled local people to contribute to how their town develops and encouraged a broader approach to heritage than fragmented conservation areas. May lead to other areas preparing own neighbourhood plans like Ham and Petersham.
- Another resident was concerned about potential watering down of existing policies.
- FORCE strongly supports objectives in relation to rivers, surrounding banks and open spaces and welcomes recognition of opportunities to improve poorer quality areas. Support improvement of under-utilised open spaces for public benefit rather than redeveloping them.

- CVP and Colne Valley Regional Park referred to the recent Colne and Crane Valleys Green Infrastructure Strategy which the revised Local Plan should make reference to and be aligned to.
- Other respondents referred to promoting walking, public transport and cycling and stopping use of cars and vehicles in the borough and doing more to protect the Victorian/Edwardian street scene that are not BTM.
- Ham and Petersham Association referred to need to control risk of increased urbanisation of conservation areas.

## Heritage

Are our current policies strong enough to ensure the ongoing protection of the borough's historic assets?

Of respondents who answered the question: 5 said yes, 9 said no and 9 said don't know [15 did not answer the question]

- Historic England commented that current policies can be strengthened more to link conservation aims with other policies, including mitigating climate change, improving access and enjoyment and tacking flood risk, to ensure that the historic environment is an integral aspect to the plan.
- Historic England advocates design-led approach to growth based on character and understanding of local areas that could be informed by existing evidence sources (Characterisation of London's Historic Environment (LUC), London's Local Character and Density (Allies and Morrison) and London's Image and Identity – Revisiting London's Cherished Views).
- The London Parks and Gardens Trust (LPGT) contributed to the 2018 Local Plan and feel that the current policies have not had long enough to be applied/tested, and should therefore be carried forward. All new residential development must be in easy reach of well-designed open spaces and take care to avoid unintended consequences of development.
- Mayor of London welcomes the borough's recognition of the importance of Kew WHS and refers to Intend to Publish London Plan requirement for Heritage Impact Assessments for developments with potential to impact WHS and its setting.
- Friends of the River Crane Environment refer to borough's heritage also being found in historic industrial sites and watercourses, which should also be protected.
- General comments relating to protection of the historic environment, including avoiding unnecessary signage, managing visitor numbers, promoting walking and cycling over vehicle use.
- A number of respondents questioned adequacy of Conservation Area, Listed Building and Building of Townscape Merit (BTM), Non-designated heritage asset status in protecting the borough's historic assets.

Do you agree that we should actively identify opportunities for development and/or redevelopment where these can result in improvements to the character and appearance of existing conservation areas?

Of respondents who answered the question: 4 said yes, 18 said no and 0 said don't know [16 did not answer the question]

- This was generally felt to be inappropriate, particularly without adequate evidence to support the approach.
- Only two respondents felt that a proactive approach to identifying opportunities for development in conservation areas would be appropriate.

## Culture

Are there other opportunities through planning to enhance the cultural offer and widen participation?

- Sport England commented that the New Local Plan should protect sports facilities and encourage new provision where appropriate and promotes Active Design principles.
- Support for increasing access to theatres and resisting their loss (including by Theatres' Trust) and support for historic music venues.
- Various areas were mentioned as requiring promotion in terms of their cultural offer.
  - Richmond Athletic Ground should be mentioned specifically as an attraction, bearing in mind its cultural offer.
  - Central Richmond, The Green and River (increased provision for the visual arts and performing arts in conjunction with education in the arts)
  - Old Deer Park
  - Royal Botanic Gardens, Kew
  - Udney Park Playing Fields
  - Reappraisal of historic assets in Ham & Petersham.
- Research needed to identify areas in cultural deficit and make provision.
- PLA supports Thames Policy Area and ensuring development along the River is appropriate.
- Better to give financial assistance to groups.

## Green infrastructure and protecting our open land

Do you agree that the MOL and Green Belt boundary review should also incorporate a review of designated Other Open Land of Townscape Importance?

Of respondents who answered the question: 14 said yes, 5 said no and 2 don't know [17 did not answer the question]

- The Mayor is pleased that it is Richmond's intention to provide strong protection against inappropriate development in these areas in accordance with Policies G2 and G3 of the Intend to Publish London Plan
- oppose any de-designation of Green Belt and any development of Metropolitan Open Land which diminished the overall value, or potential value, of the open space network of the borough and did not, as a minimum, offer a compensating increase elsewhere in the borough
- Apprehension over the considerable risk of the potential de-designation of many, much valued open spaces of the Borough as an unintended consequence of a simplistic search for growth
- Concern that housing targets appear to be regarded as a legitimate test for the existence of "exceptional circumstances" & to legitimise the challenging of Green Belt/MOL boundaries on any future occasion
- Several including Spelthorne BC support the borough's intention to carry out a borough-wide review of Green Belt and Metropolitan Open Land
- Upgrade all LBRUT OOLTI designations to MOL
- Releasing and developing protected land is neither necessary nor desirable.
- agree with the borough's suggestion that there are potentially pockets of land that could benefit from a thorough assessment against the relevant policy criteria for designation.
- Seek a review of the obstacles and severance factors which prevent the physical joining up of current, near-adjacent open spaces of various designations into larger spaces

Are there any sites that you would like to be identified for designation as 'Local Green Space'?

- Stag Brewery Playing Fields
- Udney Park Playing Fields, Langham Road open space, River towpaths and open space leading down to the Thames



- Heathfield Recreation ground and its future extension should have the highest level of protection you can give it
- Crane Park and the Shot Tower
- Two respondents suggested Cambridge Gardens and Warren Gardens
- Westerly Ware, Pensford Field, North Sheen Rec, Raleigh Road rec.
- Ham Library garden
- Several other sites were nominated for POS, Village Green and pocket park status.

**General comments (heritage, Green infrastructure and protecting our open land)**

- Mayor of London refers to protection of strategic and local views, with an effective management process, noting 3 – D modelling as a valuable tool.
- No justification in seeking to amend, let alone dilute, the existing policies for the protection of local character, heritage assets, views and vistas, the Royal Botanic Gardens Kew WHS, MOL, trees, woodlands and landscape, social and community infrastructure, Public Open Space, & Allotments.

**Overall officer comment on responses to ‘Protecting what is special and improving our areas (heritage, culture and open land)’**

There appeared to be a fear that a review would automatically lead to a loss of Green Belt and MOL. The majority supported the protection of designated open spaces.

Respondents were in favour of continuing, and in some cases increasing, the level of protection afforded to heritage assets in the Local Plan. A policy approach of identifying potential sites for development within conservation areas was generally felt to be inappropriate.



**Increasing biodiversity and the quality of our green spaces, and greening the borough**

Do you agree with the proposed policy directions? If you disagree with any of the policy directions, please tell us more.

Of respondents who answered the question: 20 said yes, 1 said no and 2 said don’t know [15 did not answer the question]

- The majority supported the proposed policy directions. A respondent felt no change was required to existing policies.
- Greater protection needed for grass playing fields, and for green verges and for their reinstatement.
- Only build on the Borough’s many brown field sites.
- FORCE said the Local Plan should recognise the contribution that improvement to the borough’s river channels and wetlands can make to tackling the climate emergency. The “if possible” get-out (p42) should be removed. They welcome a review “identifying potential

new SINCs for designation” (p43). They also support the proposal to customise the Urban Greening Factor model to LBRuT-specific criteria. (p44).

- Support for the Council’s “implementing a biodiversity net gain imperative” for all developments
- All development should make a positive contribution and all development proposals should carry a mandatory requirement to “enhance green spaces and green features” including elsewhere in the borough if such enhancement proves undeliverable on the site of the development
- Green areas which are not accessible by the public must be regarded as important as those which are.
- Concern that the recent OSNIs should be reviewed having only very recently been added and vigorously examined.

Do you agree with our overall policy directions for protecting and enhancing our biodiversity as well as recognising the contribution that green infrastructure and urban greening make to tackling climate change?

Of respondents who answered the question: 20 said yes, 2 said no and 1 don’t know [14 did not answer the question]

- Build on brownfield land and protect greenfield and MOL. Should be much stronger on protecting green space and playing fields so resources are not wasted defending the Local Plan.
- Urban greening to be included in new developments and local town centres with the use of green walls and equivalent of CityTree.
- Stop use of cars and vehicles across the borough to help biodiversity.
- The Crane Valley Partnership said that the Local Plan must recognise that the River Crane, the Lower Duke of Northumberland’s River, the Whitton Brook and the open spaces along the river corridors are extremely valuable green infrastructure assets that need to be protected and enhanced so they can fully play their part in helping to mitigate the impacts of climate change.
- Need to recognise railway lines as habitat corridors and make them SINCs.

Do you agree that we should develop our own Urban Greening Factor model rather than relying on the generic London-wide model?

Of respondents who answered the question: 13 said yes, 2 said no and 5 don’t know [18 did not answer the question]

- Most respondents supported a local Urban Greening Factor (UGF) model which relates to the specific issues in this Borough.
- One respondent disagreed.
- Roof gardens and green walls should be developed.

Do you agree with the introduction of the biodiversity net gain requirement, and if so, do you have any suggestions on how this can be secured?

Of respondents who answered the question: 17 said yes, 2 said no and 4 don’t know [15 did not answer the question]

- Need to ensure green roofs are not over relied upon (they can turn out to be low value sedum mats) and that any wildlife corridors are wide, robust and with little light penetration.
- Need up-to-date survey information on much of the borough’s woodland and open spaces.
- One respondent felt that LBRuT are not to be trusted to protect the borough’s green land and that policies should be stronger.

### General comments

- The Green and the Riverside are key MOL assets and must be protected from development
- There is pressure to commercialise the Riverside and this must be resisted.
- Policies in the current Local Plan cover biodiversity issues adequately and if further amplification is required, it could be dealt with by subsidiary planning tools.
- Suggestion to use on street parking spaces for tree planting.

### Overall officer comment on responses to 'Increasing biodiversity and the quality of our green spaces, and greening the borough'

There was backing for most of the policy directions. Respondents supported the protection of green spaces and many sought additional protections, better maintenance and enhancements. In general respondents agreed on a Local Urban Greening Factor and the Biodiversity Net Gain requirement.



### Improving design, delivering beautiful buildings and high-quality places

Do you agree with the proposed policy directions? If you disagree with any of the policy directions, please tell us more.

Of respondents who answered the question: 17 said yes, 4 said no and 1 don't know [16 did not answer the question]

- There is a general support of the policy directions which one respondent noting that they are looking forward to reviewing the detailed policy wording when available.
- A respondent stated that Council's heritage policies value Victorian and earlier neighbourhoods over interwar neighbourhoods. There was concern the removal of the Whitton and Heathfield Village Plan will reduce the ability to protect the area from inappropriate development. Similarly, another respondent felt uncomfortable with the Richmond Borough Design Guide and its emphasis on history versus quality and favouring classic looking façades with the idea they more beautiful than others.
- There is a recommendation for tighter policy regarding Tall Buildings to protect the character of some town centres such as Richmond and out of town areas such as Manor Road.
- Other responses advised that Council should be prioritising other matters and that plans for Twickenham Riverside are not beautiful

### How should the Urban Design Study identify areas for change and locations where tall buildings and/ or high density development may be appropriate?

- There were numerous responses which identified that tall buildings were not appropriate in the borough.
- Reasons provided about the lack of appropriateness included; the creation of wind tunnels at street level, they make it less attractive as a walking route and dangerous for less able people and they reduce access to sunshine and reduce daylight. It was also noted that

conservation areas should be excluded, areas with Grade II listed buildings and where a view may be obscured from a tall building.

- There was also particular concern regarding tall buildings in central Richmond.
- A respondent stated that this study should also identify areas not suitable for tall buildings.
- Other respondent noted the most important factor when considering tall buildings recognised that where tall buildings fit the local character of the wider area and the related infrastructure (transport, schools and healthcare) will not be overloaded.
- Another respondent identified areas suitable for tall buildings is above large supermarkets such as on Rugby Road, Hampton and business park buildings and town centres such as Twickenham.

### Should design review be embedded as one of the policy tools to inform determination of planning applications, and what other tools may be useful to assess the design quality of proposed schemes?

Of respondents who answered the question: 20 said yes, 0 said no and 2 don't know [15 did not answer the question]

- Overall, there was strong support for the use of design reviews. However, alongside this support, many respondents would like the design review to have greater transparency and include community engagement as well as seeking the views of local amenity societies.
- Community engagement was mentioned as an additional tool and to be used earlier in the planning process.
- Other respondents noted that other tools should include environmental (e.g. heating), as well as examining the longevity and safety of the building. One respondent stated that new buildings should try and blend in with the local architectural style if there is any nearby
- One respondent advised that they did not know what a design review was but noted that Council views that the design and layout is the responsibility of the developer and as a result agreeing to nonoptimal plans.
- Other comments recognised the need to have more 'verified' images as some of the CGG images are misleading and there is a need for greater biodiversity and the greening of our towns through green walling, planted roofs and balconies

### Should we develop our own borough-wide design guide to assist delivering high quality design, and what are the local areas' qualities and opportunities?

- There was strong support for the development of our own borough wide design guide. Nearly all responses affirmed approach although some with caveats.
- Where support was contingent, support was reliant on Council taking in the views of local residents, where it could be updated outside the local plan process or is able to reflect the distinctiveness of each town that makes up the borough.
- One respondent advised that they did not know the answer and wished for Council to decide if there is a need.
- Other responses noted that existing supplementary documents including the Village Planning Guidance, Conservation Area Statements and Design Quality Supplementary Guidance already fulfil this design guide/ or could be updated to create a design guide.
- Others noted that there should be specific guidance for riverside developments, that it should ensure adequate space for biodiversity and the ability to adapt these guidance's for particular areas (including leveraging shopfront traditions from Richmond Rd)

### Do you have any views as to how the design and development of homes could address different lifestyles, abilities and stages of life, including an ageing population?

- A respondent noted that there is a requirement under the Equalities Act to allow equal access for all which requires building to undergo changes including lifts.

- Many respondents noted the need for developments to accommodate the different demographics and different groups within the Borough. Specifically, there was strong support for adaptive homes particularly for the elderly as to age to in place.
- A few responses also identified the need for more homes to accommodate the increasing single population
- It was also identified by a few respondents that environmental and noise pollution issues will likely increase over time and that housing design needs to consider this issue
- It was also identified that balconies should be required in all developments so that residents can grow plants and food.

**General comments**

- A few respondents discussed the potential impacts this policy may have on Richmond and the importance of maintaining high standards for this area and understanding a buildings ability to adapt to new uses and to comply with building regulations.

**Overall officer comment on responses to ‘Improving design, delivering beautiful buildings and high-quality places’**

Overall the responses received showed that respondents generally supported the future direction of how to improve design, deliver beautiful buildings and high-quality places. While many respondents do not particularly supportive of tall buildings, others recognised that the Borough will have this of development and suggested methods and considerations to develop a satisfactory tall building. From the responses received, it is evident that the community wishes to participate in shaping their borough and how buildings are designed to maintain the distinctiveness of the Borough but also to ensure residents safety and help improve biodiversity.



**Reducing the need to travel and improving the choices for more sustainable travel**

Do you agree with the proposed policy directions? If you disagree with any of the policy directions, please tell us more.

Of respondents who answered the question: 18 said yes, 8 said no and 1 don’t know [11 did not answer the question]

- Mixed response in favour and opposed to this question. A number of respondents noted the importance of vehicle transport to businesses and some residents who rely on road transport, such as elderly and disabled people.
- A number noted the negative impact of high levels of traffic congestion and felt that policies should aim to improve traffic flow in the borough, including addressing amount of through-commuting by cars (which requires coordination with neighbouring boroughs).
- Richmond Bridge Residents Association referred to the particular difficulty of cycling over Richmond Bridge and would welcome a study to consider the option of making the pavement on one side a shared cycle/pedestrian path with separation curb.

- Ham and Petersham Association stated that until PTAL in this area is improved measures to disincentivise car use will fall more heavily on those reliant on cars which tend to be older, less mobile people and young families.
- A number of respondents disagreed with the principle of CPZs, feeling that this made people pay for the use of the public realm, and encouraged more driving around to find parking spaces.
- Otherwise, general support for reducing car-dependence and a move to more sustainable modes of travel, promoting walking, public transport and cycling in the borough, as well as focus on car-lite developments.
- One resident suggested there be more focus on cycling lanes in the borough, including for longer distance commuter cycling, as well as better provision for local journeys.
- General support for electric vehicle use, including providing additional charging points.
- Highways England support policies that seek to reduce parking provision and encourage car-free or car-lite developments in the borough as these are likely to reduce the impacts of developments on the strategic road network (SRN).
- Richmond Cycling Campaign welcomes the recognition of active and sustainable travel options in the Direction of Travel and requests more detail be included about how this could be delivered. Requested to be contacted prior to submission of plan for examination.

#### What measures need to be put in place if the Council is to support car-free and car-lite development in areas with currently lower levels of access to public transport?

- Responses were split between respondents stating that all new developments should be car-free with no parking for private cars, and others disagreeing with this approach. Of those who were supportive of car-free and car-lite development, it was felt that this type of development could benefit younger and older people who did not want to own a car as well as those on lower incomes, as most housing in Richmond borough already has car parking,
- Improvements to public transport was a frequent response to this question. Measures referred to tended to be focused on bus provision and included:
  - support for more bus lanes;
  - Lower fares;
  - Intelligent public transport routing;
  - increased bus frequency;
  - integration between bus and train timetables;
  - reduced road congestion caused by road works making bus times unreliable;
  - clean services;
  - introducing bus lanes where possible;
  - reintroduction of trolley buses (being quieter and smoother than buses and less polluting); and
  - prioritising of buses over private vehicles on roads, including where cars can be parked.
  - 100% EV buses by 2030.
- Cycling infrastructure improvements were frequently mentioned and included:
  - support for segregated cycle lanes and dedicated cycle routes;
  - Safe borough cycling network;
  - further traffic calming measures to increase safety;
  - more cycle parking facilities including secure parking near public transport.
- Improvements to benefit pedestrians were mentioned by a number of respondents, including better connectivity through new foot and cycle bridges, good accessibility to social and cultural facilities and banning cars from narrow roads in particular (such as Church Street) and town centres and good design to reduce conflict between pedestrians and cyclists.

- Electric vehicle charging was supported by a number of respondents, including more charging points for electric cars. A small number of respondents felt that lower emission cars should be encouraged rather than car lite/car free development.
- A respondent was concerned that cars would still be needed for larger purchases, and that if people did more online shopping it would negatively impact on town centres and employment levels.
- TfL Commercial Development strongly agree that car-free developments should be supported, and that development in locations with high existing or planned public transport accessibility should be optimised in link with the Intend to Publish London Plan policy H1.
- Ham and Petersham Association were supportive of improvements to public transport and providing electric vehicle charging points but wanted to avoid a reduction in space for cars and opposed the closing of Richmond Park to traffic.

#### What additional facilities does the borough need to support greater levels of walking and cycling?

- Encouragement of more young people to cycle to school through measures to improve safety - suggested cycling proficiency classes, 20 MPH speed limit (Cycling UK may be able to advise)
- Improve poor quality of some cycle paths across the borough.
- TfL suggested securing sufficient quantities of good-quality cycle parking will enable more people to cycle. Support Council's aim to go further than the London Plan cycle parking standards given high levels of cycling in the borough. Developer contributions could be used to improve routes in areas less permeable by cycle alongside strategic and local routes. TfL welcome recognition of importance of bus networks within the borough and will continue to work the Council to understand how this can be improved protected and funded.
- FORCE support improvements for cyclists and pedestrians, seeking a borough-wide review of severance factors preventing the physical joining up of near-adjacent spaces into larger spaces, for example land ownership. Suggest Council needs to work alongside other boroughs and agencies such as Crane Valley Partnership and Thames Landscape Strategy to consider active travel at a sub-regional level. Recommend adoption of the Colne and Colne Valley Green Infrastructure Strategy by the borough.
- Measures recommended by respondents to improve walking and cycling routes included:
  - Secure cycle parking near stations, in town centres and all new housing units;
  - Review of all existing cycle lanes including those on main roads;
  - Prioritise pedestrians and cyclists over vehicles, including traffic calming measures;
  - Identification and better maintenance of main walking routes to match standards on main roads;
  - More protected/segregated cycle lanes;
  - Filling potholes which can cause damage to bikes;
  - Cycle rental schemes;
  - Focus on improvements in lower cycling areas of the borough;
  - Improvements to Richmond Bridge for cycling;
  - Improve cycle paths in Richmond Park if vehicle use is to continue;
  - Improve crossing points to requirements of Equalities Act;
  - Maintain vegetation on bridges better to prevent encroachment on footpath;
  - Benches on walking routes;
  - A number of comments specifying improvements to cycling and walking routes in Heathfield and Whitton;
  - Dedicated safe cycling route from Ham to Richmond (24 hours);
  - Reduce parking spaces in town centres except for elderly and disabled;
  - Improve all pavements;
  - Prevention of cycling and scooter use on pavements (including prosecution);

- Separation of walkers and cyclists in some circumstances where there is overcrowding (e.g. towpath)
- Encouragement by parents and schools for children to walk more;
- Reduce pavement clutter;
- Safe crossings on main roads;
- Better bus/public transport services
- Port of London Authority considered that Local Plan should include requirement for developments in close proximity to the River Thames to maintain and improve existing access to the riverside, or provide new access to the riverside and Thames Path, in line with existing Local Plan policy LP 18 (River Corridors).
- Ham and Petersham Association commented on the importance of local facilities in reducing vehicle use.
- Support for Richmond Cycling Campaign’s objectives (including low traffic neighbourhoods, cycle hangars, pedestrian priority crossing points, safe cycle lanes and schemes to reduce and coordinate deliveries in town centres).

If the availability of parking in the borough’s town centres was less than it is now, would it encourage you to walk, cycle or use public transport more?

Of respondents who answered the question: 9 said yes, 14 said no and 3 don’t know [12 did not answer the question]

- Mayor of London supports borough intention to apply Intend to Publish London Plan residential parking standards, including those for areas with low PTALs, alongside exploring potential for increasing levels of public transport and cycling infrastructure and active travel. Borough should however note Secretary of State’s Directions on the Intend to Publish car parking standards.
- TfL referred to importance of restricting car parking in new developments (car lite and car free developments) in achieving wider sustainability goals.
- Richmond Bridge Residents Association agree some reduction in town centre parking might encourage more non-car trips, suggesting existing car park areas could be more intensively used. Don’t support changing parking standards in low PTAL areas of the borough, ahead of improvements in access to public transport and where parking is reduced, resident parking should be prioritised.
- Suggestion from Prospect of Richmond that only residents parking and cycles should be able to access Richmond town centre.
- Appropriate levels of parking should be assessed as part of planning applications and policies should be set locally (as opposed to London-wide by GLA and TfL).
- Richmond Cycling Campaign suggested study of parking on public land in the borough to inform potential release of land for other uses.
- In general, there was limited support for reducing current levels of town centre parking. Respondents commented that this would discourage town centre visits, and therefore spending would be done elsewhere.
- A number of respondents commented that they already used public transport to access town centres unless they required the car, for example for large purchases.
- A small number of respondents stated that reducing parking availability in town centres may encourage a shift to more sustainable forms of transport, but suggested this goal could also be achieved through changing parking charging structures to discourage long-term parking.



Should the Council actively pursue alternative uses (such as for much needed affordable housing, employment space and/or social and community infrastructure uses) on its existing car parks in town centres?

Of respondents who answered the question: 16 said yes, 11 said no and 2 don't know [9 did not answer the question]

- There was a mixed response in favour and against reducing the levels of town centre parking.
- General support for redevelopment of existing surface and multi-storey car parks to provide parking (possibly underground) alongside other uses including housing, to make more efficient use of space.

#### General comments

- Prospect of Richmond referred to likelihood that there will be a limited reduction in emissions from vehicles over the plan period. There will therefore be a need for planning to address growth in electric vehicle use – electric charging of cars at scale – and a modal shift to public transport. Residents and visitors with zero emission vehicles should not be inconvenienced by any reduction in visitor and resident car parking capacity.

#### Overall officer comment on responses to 'Reducing the need to travel and improving the choices for more sustainable travel'

There were very mixed views on whether borough should aim to reduce car ownership in the borough by seeking more car-free/car-lite development. This was strongly supported by some respondents, whilst others saw the benefit of car ownership for residents, particularly those who were less able to rely on other modes of transport such as the elderly, disabled and young families. There was support for improving traffic flow on congested roads, particularly linked to through-commuting, but not necessarily by reducing levels of car ownership.

Bus travel was highlighted many times as being very important to residents in the borough, reflecting the relatively low accessibility to railway stations. A number of measures were suggested to improve the experience of bus travel within the borough. Cycling was highlighted as being very important to respondents and a number of measures were suggested to improve facilities for cycling, as well as the number of people choosing cycling as a means of transport.

Whilst a reduction in town centre parking was not generally supported, there was general support for the principle of redeveloping car park sites to provide parking alongside other uses and make more efficient use of space.



#### Securing new social and community infrastructure to support a growing population

Do you agree with the proposed policy directions? If you disagree with any of the policy directions, please tell us more.

Of respondents who answered the question: 20 said yes, 2 said no and 3 don't know [13 did not answer the question]

- The majority of respondents supported the policy directions. Of those that elaborated on their answer, the focus was on improving existing community facilities and promoting walking, public transport and cycling to decrease car use across the borough.
- One respondent noted that the 'sequential test' process needs to be written down in order to ensure Council officers are not writing the test as they receive planning applications.

Is there a need for a particular type of community facility in your local area?

- Many respondents identified the need to upgrade/refurbish/ enhance existing facilities to protect their future use as well as the ability expand for other community uses such as nurseries, spaces for older people/ elderly and more recreation/ sport uses. Heathfield Recreation Ground was identified by two respondents as a site for refurbishment and another recognised the importance of ETNA as community facility.
- A respondent advised that Mortlake needs a health centre and another has stated an additional Public House would be an effect community facility.
- A respondent recommended that Council jeep the Playing Pitch up to date with regular stakeholder consultation to future proof these groups post COVID-19.
- Ellery Hall has been identified by respondents as a site which should be retained. Similarly, a respondent believes that Council takes too long to make a decision such as Ellery Hall and this indecision serves no one
- There were a few respondents which didn't believe their area required any other facilities/ was already well served.
- The protection and expansion of river related sports and recreation facilities was another recommendation from one respondent.
- Metropolitan Police Service have identified the need for a car pound in the Borough.
- The NHS Property Services have advised that currently assessing vacant or underused space across their portfolio to identify space that could be repurposed for the provision of clinical beds in light of COVID-19.

What is the best way to provide enough school places for our growing population?

- There were mixed responses regarding the best way to provide enough school places for our growing population. While some suggested investing in new schools, upgrading existing, others felt that there is an overprovision of school spaces.
- Many of the respondents who supported new schools recommended that catchment areas are used and to reserve the site through the Local Plan process.
- A respondent noted that the private provision of schools should be expanded by providing free school places for children.
- Other respondents thought Council could better utilise existing schools site either by upgrading them or allow development in areas where there is sufficient school places available
- DfE discussed the various legislation regarding school provision and recommended that the site allocation tool is useful policy to ensure and safeguard school sites. They also recommended that Council continually monitors the position with regards to pupil places and school delivery and ensuring the Infrastructure Delivery Plan is up to date.

Should we encourage more community uses in borough centres? Should they be encouraged as part of larger or mixed use developments?

Of respondents who answered the question: 19 said yes, 1 said no and 2 don't know [16 did not answer the question]

- There was strong support for more community uses in the borough

- The respondents mentioned that;
  - it should be encouraged everywhere,
  - should not be at the expense of retail, and
  - should be a community use for the whole community and not a subsection.

#### Should there be increased public access to school facilities?

Of respondents who answered the question: 17 said yes, 2 said no and 3 don't know [16 did not answer the question]

- Most respondents supported public access to school facilities including for evening classes and sporting facilities. Multiple responses noted that there is a need for a community access agreement with schools to ensure the facilities could continue to be used and to meet future demand. A one noted that this school include independent schools.
- Others noted that currently there is adequate access to school facilities. A respondent clarified that increased public use of school facilities could compromise security and safety of the children attend that school.
- Others only support the increased use if it doesn't generate more disruptions for nearby residents or if staff will be provided to allow public access after as schools themselves are unable to afford this expense.
- Less positive responses included the expenditure associated with increased public access and that it may unrealistic to gain more public access schools due to bureaucracy

#### General comments

- A respondent recommended that the K5 to Grey Court School should be extended.
- The Mayor of London supported the intended approach and themes regarding new social and community infrastructure, creating safe, healthy and inclusive communities as they are closely aligned with the Mayor's Good Growth Objective GG1, Building strong and inclusive communities.
- The Metropolitan Police Service (MPS) were pleased that the DoT referenced 'policing and other criminal justice or community safety facilities' as social infrastructure within the adopted Local Plan. As noted in their recent submission to the Richmond Planning Obligations SPD Consultation, the MPS are seeking to secure S106/CIL from development due to the impacts on crime.
- Department for Education noted that where additional need for school places which are generated by housing growth, the Infrastructure Delivery Statement should identify the anticipated CIL and Section 106 funding towards this infrastructure. They advised that Local authorities sometimes experienced challenges in funding schools via Section 106 planning obligations due to limitations on the pooling of developer contributions for the same item or type of infrastructure. However, the revised CIL Regulations remove this constraint, allowing unlimited pooling of developer contributions from planning obligations and the use of both Section 106 funding and CIL for the same item of infrastructure. They also request a reference within the Local Plan's policies or supporting text to explain that developer contributions may be secured retrospectively, when it has been necessary to forward fund infrastructure projects in advance of anticipated housing growth.

#### Overall officer comment on responses to 'Securing new social and community infrastructure to support a growing population'

Overall, there was a general acceptance of the approach taken to secure new social and community infrastructure. Respondents seem particularly supportive of upgrading existing facilities, although some recognised the need for new facilities. Maintaining existing access to schools/ increasing access for other uses by the public was generally accepted. There is a divide however, regarding the need for school places although it was evident that there is a view that Council will need to carefully

consider the demographics of the borough and encourage development where there are sufficient vacancies in schools.



### Creating safe, healthy and inclusive communities

Do you agree with the proposed policy directions? If you disagree with any of the policy directions, please tell us more.

Of respondents who answered the question: 15 said yes, 4 said no and 3 don't know [16 did not answer the question]

- FORCE welcomes the inclusion of theme in the Direction of Travel, but believe that greater emphasis should be placed on the importance of borough's open and wild spaces in promoting physical and mental health, than aspects such as Healthy Streets, fast food outlets, sports and health facilities.
- Crane Valley Partnership want the Local Plan to recognise health benefits of convenient access to Borough-wide network of connected high quality open spaces.
- Need to understand underlying causes of variations in health of residents - including diet and lifestyle factors, quality of housing, mental health impacts of noise.
- Ensure Public Health is consultee on Local Plan.
- Two respondents referred to increasing walking, including recreational walking to improve health and stopping cars and vehicles across the borough.

### Should it be easier to change use from other land uses to community uses?

Of respondents who answered the question: 9 said yes, 2 said no and 7 don't know [20 did not answer the question]

- Limited number of responses to this question, but general support depending on the need/circumstances. Change of use of buildings was supported, but not green space unless related to the functional use of the green space. Change of use to a school was considered to be controversial by one resident due to pollution impacts.
- A respondent felt that accommodating a community use should not be to the detriment of providing another facility (i.e. a retail unit) if it didn't provide much community value. Another felt change of use of an unused retail unit would be acceptable.

### Should policy strongly resist more takeaways in areas in proximity to schools?

Of respondents who answered the question: 15 said yes, 2 said no and 2 don't know [19 did not answer the question]

- Majority support resisting more takeaways, particularly in areas with high levels of obesity. Consider further control of advertising.
- Free school meals suggested.
- SSA Planning representing KFC felt that the existing policy was not targeted enough, that unhealthy food could be purchased from a range of use classes not just takeaways.

- A respondent felt these restrictions are not appropriate in a democracy.

**Do you have any other suggestions on how planning can promote or contribute to creating places and an environment that is conducive to weight loss and active lifestyles?**

- Sport England advocate the protection of existing sports facilities and support new provision where needed.
- Department for Education comment that assessments for proposals affecting existing open space, sports and recreational buildings and land should comply with the NPPF. Advice offered on content of forthcoming evidence base.
- Several respondents felt that promotion of walking, cycling and public transport and restricting car use was key.
- Support for protection of open space, dual use of school facilities, outdoor gyms, play grounds and playing fields.
- A respondent felt that monies should not be spent on promoting healthy lifestyles, but rather on meeting basic care needs.
- A respondent felt that delivering adequate housing with sustainable access to jobs and facilities, including open space and recreation, is the key means by which planning can promote health.

**Are there other opportunities through planning to promote healthy lifestyles?**

- Responses reflect the view that planning on its own cannot result in healthy lifestyles. Education to enable individuals to make good lifestyle choices is considered very important.
- Suggestions made included:
  - Improve active travel and public transport and reduce car use.
  - Provide access to greenspaces, in addition to the Royal Parks and protect areas used for recreation.
  - Provide sporting facilities, specifically swimming pools and an ice rink
  - Encourage schools, employers and retailers to provide opportunities for good food choices.
  - Ensure new developments are permeable and link up
  - Restrict food and drink uses based on lack of viability in areas of deprivation.
- Support for Public Health England Guidance.

**How can we ensure convenient and welcoming development with no disabling barriers, providing independent access without additional undue effort, separation or special treatment?**

- Several respondents felt that the separation of walking and cycling, promotion of public transport and reduction in car use was important.
- Importance of good design.
- Liaison with the disadvantaged.
- The PLA commented that there must be continuing reference for riverside developments to provide riparian life-saving equipment where required.

**General comments**

- The Council should continue to oppose expansion of Heathrow and increase in flights.

**Overall officer comment on responses to ‘Creating safe, healthy and inclusive communities’**

There was general support for the initiatives proposed however, many respondents acknowledged that planning alone cannot resolve many of these concerns discussed and that there shouldn't just be a focus on fast food outlets.

Could consider a shift in the emphasis of the Local Plan policies to the important role of open and green spaces, as opposed to focusing on more urban and indoor facilities (fast food outlets, sports and health facilities) in encouraging healthy lifestyles.

### **Call for Sites**

#### Sites suggested and potential use (nature of site promoter)

- LGC Queens Road, Teddington for a mix of employment and residential uses (put forward on behalf of landowner LGC Teddington)
- Greggs Bakery, Twickenham for residential use (put forward by London Square Developments)
- Greggs Bakery was also submitted by other residents who either support a residential or wished to submit their objection to its inclusion to the Call for Sites list.  
[For context: London Square Developments sent letters to residents in the area notifying them about the Council's Call for Sites and encouraging them to provide feedback on the type of development they would like to see on the site]
- Twickenham Bus Stand, Station Yard for residential use and the Fulwell Bus Garage for continued bus usage alongside residential use (put forward by TfL Commercial Development). CPRE also suggested the site around the Fulwell Bus Garage.
- Maintaining the current Site Allocation for Richmond Athletic Ground and amending to reflect redevelopment aspirations including enabling residential use (put forward by Richmond Athletic Association)
- Whitton Community Centre and car park for residential use (put forward by a resident)
- Anywhere there is a large supermarket and car park or business park locations could include carparks at Sainsburys or MacDonald's for retail, leisure, office, warehousing and housing (put forward by a resident)
- Old Deer Car Park, Richmond (and many other council car parks) for residential and office use (put forward by a resident). Similarly, CPRE suggested that the carpark for Sainsburys in Hampton to be converted to green space and a low-rise retail unit.
- Harlequin Football Club for a mixed residential, commercial, retail, community uses as well as the new sports stadium (linked with the and the adjacent Twickenham Central Depot site) (put forward by Harlequin Football Club)
- CPRE suggested other sites including Lower Teddington Road, Stanton Avenue, Homebase North Sheen, North Sheen near the station where there are garages and a surface car parks which could be better utilised for car free developments. They also identified Kew Retail Park and the Oldfield Road light industrial site for more intensified use including commercial and residential.
- Arlington Works, Twickenham for a mixed use of residential and commercial/industrial/office (put forward by landowner)
- Land at the back of 102 Sheen Road and adjacent to 2 Sheen Park, Richmond (put forward by a resident)
- The extended rear gardens of no's 271/273 Hanworth Road, Hampton for residential use (put forward by two residents)
- Green spaces for leisure (put forward by a resident)
- Kneller Hall, Kneller Road Twickenham referring to the current Site Allocation, for a mix of uses including residential (put forward by the Defence Infrastructure Organisation on behalf of the landowner the MoD)
- The existing Stag Brewery site allocation to be varied to reconsider the consolidation of the existing secondary schools in the area. To facilitate this a site allocation should be provided to Mortlake Station, Richmond Park Academy and Christs School (put forward by Mortlake Brewery Community Group)

- Bridge Farm Nursery, Hospital Bridge Road, Whitton for the relocation of the Bishop Perrin School or affordable housing for older people (put forward by a resident)
- St Margaret’s Business Centre for residential use (put forward by Sheen Lane Developments)
- Land to the west of Stain Hill West Reservoir, Hampton Water Treatment Works and Hydes Field, land north of Hampton Water Treatment Works, Upper Sunbury Road for residential or mixed use development (put forward by Thames Water)
- Former Thames Water operational land adjacent to West of Sunnyside Reservoir, Lower Hampton Road, Hampton for residential use (put forward by the landowner and another resident)
- The current Site Allocation SA 19 Richmond Station should be redrafted to ensure development will adequately recognise the architectural and historic interest of the site (put forward by a local resident) , given the failure of the Council and the Inspector to properly or adequately consider and respond to such issues put forward during the preparation of the 2018 Local Plan in respect of SA 19. CPRE also suggested this site as car parking at Richmond Station could be replaced with commercial and/or retail development
- The Mortlake with East Sheen Society has advised the need to review the existing Site Allocations including Stag Brewery as well removing SA25 Mortlake and Barnes Delivery Office. Furthermore, it was advised that comprehensive redevelopment still required, and that detailed planning is still required for SA27 Telephone Exchange and 172-176 Upper Richmond Road West. Mortlake Station, Richmond Park Academy and Christ’s School should also be included as Site Allocations.
- *[Also note other types of sites and specific sites were generally mentioned under ‘Scale of the challenge, opportunities and setting the Direction of Travel’.]*
- *[Also note Udney Park Playing Fields (mentioned by residents and local group) some respondents supported for Local Green Space designation and some respondents supported development, including in comments under ‘Scale of the challenge, opportunities and setting the Direction of Travel’ and ‘Protecting what is special and improving our areas’.]*

We would like to know whether there are any barriers to delivery, such as infrastructure constraints? And if yes, do these affect any particular or common types of development, such as small sites?

Of respondents who answered the question: 10 said yes, said 1 no and 3 don’t know [22 did not answer the question]

- Most respondents did not specify or know of any barriers to development.
- One respondent noted that the proposal would involve shared access with a high school which may result in safety concerns.
- Another identified that flooding may be a constraint as the site is located in Flood Zone 2 and that the site contained significant trees
- A respondent has stated that Council is claiming that site is Green Belt land
- A respondent has stated there is involvement of multiple land owners
- Another resident noted that the current use of the site would need to be relocated (however it could be relocated to the adjacent school site)
- There is a potential need to upgrade services including sewerage and electricity grids to accommodate growth.

#### General comments

- Historic England emphasis on considering the historic environment early in site assessments.
- A resident mentioned that Council should consider underground carparking to free up land for redevelopment.
- Most respondents advised that the land is available now or available subject to planning permission.

- There were references made by numerous respondents about car lite developments to help facilitate potential development.
- *[Also note DfE emphasis on clarifying requirements for the delivery of new schools through site allocations in response under ‘Securing new social and community infrastructure to support a growing population’]*

#### Overall officer comment on responses to ‘Call for Sites’

- There were various locations throughout the Borough which residents, landholders and business believe warrant a site allocation.
- Predominately it was suggested that these sites should be residential although some have suggested a mixed use on the site.
- The scale development proposed was mixed with some suggesting two new residential dwellings to hundreds of flats.
- It is evident that the Stag Brewery site while has received some support from the developers and community members, there is much community objection to the proposed development on site.

#### **Other general comments (not related to specific consultation questions)**

- TfL set out general context on their comments, made from their role as a transport operator and highway authority, and referred to the advanced stage of the draft London Plan in responding to consultations.
- Details provided on the National Grid electricity transmission system, identifying the assets which pass through the borough – routes of two 275Kv underground cable.
- Spelthorne Borough Council note additional demand on local infrastructure and transport expected given scale of development planned, and welcome further engagement, along with Surrey County Council who recently produced transport modelling for Spelthorne’s Preferred Options Local Plan.
- The Marine Management Organisation (MMO) set out general details on their responsibilities for marine licensing, marine planning (including the draft South East Inshore marine plan), and minerals and waste plans and local aggregate assessments, which may need to be referred to in planning documents.
- The Old Deer Park (ODP) Working Group urge an update to the 2015 Policies Map to show amendments/additions to boundaries and site-specific Allocations adopted since then including adjustments to the boundaries of designated MOL and Public Open Space in ODP, potential adjustments to the boundary of the Historic Registered Park, the boundary of the area covered by the ODP SPD and the boundary of the ODP Conservation Area, to remedy significant and long-established anomalies. Also requests to review the substantially deficient/defective draft Pools-on-the-Park, Richmond Statement of Significance for SA 22.
- Friends of Richmond Green indicated they support the comments made by Prospect for Richmond.
- Udney Park Playing Fields Trust encouraged the Council to be bold, defend and uphold the Local Plan protection of UPPF. Urge the Council to resolve the future of UPPF as a long term sustainable self-funded community facility.
- Some statutory consultees made no comments – Natural England and Surrey County Council.