

LBRuT analysis of all responses received on the consultation of the draft Local Views SPD from 22nd July 2022 to 5th September 2022.

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

Respondent reference no.	Name / Organisation
1.	Transport for London
2.	Natural England
3.	Greater London Authority
4.	Historic England
5.	National Highways
6.	Surrey County Council
7.	Teddington Society Planning Group
8.	The Royal Parks

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1	Richard Carr – Transport for London	Thank you for consulting Transport for London (TfL). I can confirm that we have no comments to make on the draft SPDs.	Noted.	1. None.

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2	Sharon Jenkins – Natural England	<p>Thank you for your consultation request on the above dated and received by Natural England on 22nd July 2022.</p> <p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>Our remit includes protected sites and landscapes, biodiversity, geodiversity, soils, protected species, landscape character, green infrastructure and access to and enjoyment of nature.</p> <p>While we welcome this opportunity to give our views, the topic this Supplementary Planning Document covers is unlikely to have major effects on the natural environment, but may nonetheless have some effects. We therefore do not wish to provide specific comments, but advise you to consider the following issues:</p> <p>Green Infrastructure</p> <p>This SPD could consider making provision for Green Infrastructure (GI) within development. This should be in line with any GI strategy covering your area.</p> <p>The National Planning Policy Framework states that local planning authorities should ‘take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure’. The Planning Practice Guidance on Green Infrastructure provides more detail on this.</p> <p>Urban green space provides multi-functional benefits. It contributes to coherent and resilient ecological networks, allowing species to move around within, and between, towns and the countryside with even small patches of habitat benefitting movement. Urban GI is also recognised as one of the most effective tools available to us in managing environmental risks such as flooding and heat waves. Greener neighbourhoods and improved access to nature can also improve public health and quality of life and reduce environmental inequalities.</p> <p>There may be significant opportunities to retrofit green infrastructure in urban environments. These can be realised through:</p> <ul style="list-style-type: none"> • green roof systems and roof gardens; • green walls to provide insulation or shading and cooling; • new tree planting or altering the management of land (e.g. management of verges to enhance biodiversity). <p>You could also consider issues relating to the protection of natural resources, including air quality, ground and surface water and soils within urban design plans.</p> <p>Further information on GI is include within The Town and Country Planning Association’s "Design Guide for Sustainable Communities" and their more recent "Good Practice Guidance for Green Infrastructure and Biodiversity".</p>	<p>The Council notes the comments that this SPD is “unlikely to have major effects on the natural environment, but may nonetheless have some effects.”</p> <p>As set out in Planning Practice Guidance, SPD’s should build upon and provide more detailed advice or guidance on policies in an adopted local plan. The focus of this SPD is to build upon adopted Local Plan Policy LP24: Waste Management. Therefore, the Council deems the issues and topic areas in this representation, although useful for other areas of the Council’s work, out of scope for this SPD consultation.</p> <p>The adopted Local Plan as well as the emerging draft new Local Plan have policies on green infrastructure, biodiversity and landscape features. The Council is actively looking to update its</p>	2. None.

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		<p>Biodiversity enhancement This SPD could consider incorporating features which are beneficial to wildlife within development, in line with paragraph 118 of the National Planning Policy Framework. You may wish to consider providing guidance on, for example, the level of bat roost or bird box provision within the built structure, or other measures to enhance biodiversity in the urban environment. An example of good practice includes the Exeter Residential Design Guide SPD, which advises (amongst other matters) a ratio of one nest/roost box per residential unit.</p> <p>Landscape enhancement The SPD may provide opportunities to enhance the character and local distinctiveness of the surrounding natural and built environment; use natural resources more sustainably; and bring benefits for the local community, for example through green infrastructure provision and access to and contact with nature. Landscape characterisation and townscape assessments, and associated sensitivity and capacity assessments provide tools for planners and developers to consider how new development might makes a positive contribution to the character and functions of the landscape through sensitive siting and good design and avoid unacceptable impacts. For example, it may be appropriate to seek that, where viable, trees should be of a species capable of growth to exceed building height and managed so to do, and where mature trees are retained on site, provision is made for succession planting so that new trees will be well established by the time mature trees die.</p> <p>Other design considerations The NPPF includes a number of design principles which could be considered, including the impacts of lighting on landscape and biodiversity (para 180).</p> <p>Strategic Environmental Assessment/Habitats Regulations Assessment A SPD requires a Strategic Environmental Assessment only in exceptional circumstances as set out in the Planning Practice Guidance here. While SPDs are unlikely to give rise to likely significant effects on European Sites, they should be considered as a plan under the Habitats Regulations in the same way as any other plan or project. If your SPD requires a Strategic Environmental Assessment or Habitats Regulation Assessment, you are required to consult us at certain stages as set out in the Planning Practice Guidance. Should the plan be amended in a way which significantly affects its impact on the natural environment, then, please consult Natural England again. Please send all planning consultations electronically to the consultation hub at consultations@naturalengland.org.uk</p>	<p>policies and guidance to ensure that the most up-to-date evidence and guidance is promoted.</p>	

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3	Katie Lindsay – Greater London Authority	<p>1. Throughout the SPD</p> <p>GLA comments We suggest that the Council clarifies how they plan to balance out the two keys aims of the SPD i.e.:</p> <ul style="list-style-type: none"> • having adequate space provision for the storage of solid waste; • in so far as is practicable, enabling occupants to reduce the quantity of waste requiring collection and to re-use and/or recycle more of the waste they produce <p>These appear at odds with each other and it may be difficult for a developer to achieve a balance between the two. We would therefore request that the Council provides further clarity on how they envisage developers will enable occupants to reduce waste throughout the SPD.</p> <p>We also suggest that ‘solid waste’ is defined in the SPD, particularly in the aims, which should be specific about the need for adequate space for separation of waste for recycling (acknowledging that this is specified later in the document). In Policy S17 A(6) the London Plan requires that developments are designed with ‘adequate, flexible, and easily accessible storage space and collection systems that support, as a minimum, the separate collection of dry recyclables (at least card, paper, mixed plastics, metals, glass) and food.’</p>	<p>3.1.a. The Council does not agree that the two key aims raised in this comment, are at odds with one another. Space for solid waste includes space for recycling and it is not possible to size the space on an unreliable assumption that substantial reductions in waste volumes will be achieved although this is of course desirable.</p> <p>3.1.b. The Council is of the opinion that the available practical opportunities for developers to enable occupants to reduce waste are limited and instead the Council is focusing on reducing the quantity of waste requiring collection. In terms of food waste, the Environment Act 2021 will soon require weekly food waste collections.</p> <p>3.1.c. In light of officer comments in 1b, the Council agrees to make a change to paragraph</p>	<p>3.1.a None.</p> <p>3.1.b. None.</p> <p>3.1.c. The Council have made a change to paragraph 1.1.2 iv) as follows: “In so far as is practicable, and by providing enhanced storage and access requirements, enable occupants to reduce the quantity of waste...”</p> <p>3.1d. The Council have made a change to paragraph 1.1.1. as follows; “This document provides detailed guidance on the London Borough of Richmond-upon-Thames’ (LBRuT) requirements for the storage and collection of waste and recycling in all occupied developments solid waste, which consists of organic, recyclable, and residual waste. This guidance is targeted at all new developments whether they generate household, commercial or industrial waste or a combination of these, although the principles should also be adopted by existing developments where practicable.”</p>

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			<p>1.1.2 iv) to reinforce the context of the SPD.</p> <p>3.1d. The Council will make it clearer within paragraph 1.1.1. that 'solid waste' refers to refuse for disposal and recycling.</p>	<p>The Council have also made a change to paragraph 1.1.1 i) as follows: "have adequate space provision for the separate storage of solid waste streams;"</p>
		<p>2. 3.1.1 <i>All developments must provide suitable and sufficient space for the storage of the waste containers required to contain the likely volumes arising between collections, including space to enable waste for recycling to be stored separately.</i></p> <p>GLA comments We believe that it needs to be clarified whether the Council is referring to internal or external space here. Internal space is the more critical factor, as if there is insufficient space for internal segregation and storage, residents won't then engage properly with any external service provision.</p>	<p>2. The Council state in paragraph 4.2.8 that external dustbin-based refuse storage is the preference, but if this is not possible (perhaps due to a lack of space), suitably ventilated and vermin-proof internal cupboards will be acceptable.</p> <p>The Council have linked to paragraph 4.2.8 within paragraph 3.1.3 and also added a sentence regarding suitable internal storage space between collections.</p>	<p>The Council have added a sentence to paragraph 3.1.3 to read; "Developments must provide suitable internal storage for solid waste between collections in accordance with paragraph 4.2.8 and should only present solid waste onto the public highway;"</p>
		<p>3. 3.1.2 <i>As the opportunity for occupants to recycle must be retained, there must be sufficient space to store the likely volumes of waste arising between collections as refuse with additional separate space for recycling storage</i></p> <p>GLA comments In 3.1.2, this would read better as below, to place the emphasis on recycling, rather than refuse:</p>	<p>3. The Council will alter the wording of paragraph 3.1.2 to make it clearer that there should be adequate space provided for all refuse and recycling to be stored correctly or</p>	<p>3. The Council has replaced paragraph 3.1.2 with the following paragraph; "There must be sufficient space to store the total weekly volume of solid waste likely to arise between collections, including suitable storage</p>

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		<p><i>As the opportunity for occupants to recycle must be retained, there must be sufficient space to store the likely volumes of material arising between collections.</i></p>	<p>incorrectly.</p> <p>The Council will amend this paragraph to make it clear that there must be sufficient space to store waste as refuse in the event that occupants do not recycle effectively, but also that recycling space should be provided in addition to refuse capacity in the likely scenario that occupants/residents do recycle at least some solid waste.</p>	<p>space to enable residents to recycle. Table 1 below sets out the total solid waste container storage space required for each dwelling and therefore in each development, but in practice, the ratio of refuse and recycling containers can be determined according to the needs of occupants.”</p>
		<p>4. 3.1.3. <i>Where this is not practicable, it is only acceptable to present waste onto the public highway for collection: i) where the property has no front garden, driveway or equivalent external space or cupboard at the front from which waste could be collected from; ii) where the main entrance opens directly onto the highway.</i></p> <p>GLA comments This could be expanded to highlight that developers should adequately plan space to avoid the need for waste to be presented on the highway.</p>	<p>4. It is not always practical or achievable to design within a development a waste presentation cupboard, especially for flatted development above shopfronts. However, the Council will alter paragraph 3.1.1 to highlight that these issues must be considered from an early stage, and within paragraph 3.1.3, that the Council will only accept waste presentation on the highway if the criteria set out in 3.1.3 i) to vii)</p>	<p>4. The Council has changed paragraph 3.1.1 as follows: “all developments from an early stage must plan for and then provide suitable and sufficient space for the storage of the solid waste containers required...”</p> <p>The Council has altered paragraph 3.1.3 as follows: “It is not acceptable to store waste on the public highway at any time. Waste should be directly collected from within the front curtilage of developments where practicable as waste</p>

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			are met and upon provision of suitable internal storage in accordance with paragraph 4.2.8.	awaiting collection on-street is unsightly and can result in obstructions and/or street litter. Where this is not practicable, for example where flats are located above shops , it is only acceptable to present waste onto the public highway for collection in line with guidance provided below and on the Council's <u>dedicated webpage</u> . Developments must provide suitable internal storage for solid waste between collections in accordance with paragraph 4.2.8 and should only present solid waste onto the public highway;...”
		<p>5. 4.1.5 <i>Whilst outside the planning process, in addition to the waste and recycling container requirements detailed below, kitchen design should cater for at least three streams of waste.</i></p> <p>GLA comments It is our understanding that whilst developers are required to build the development in accordance with approved plans, a change to the kitchen once occupied is likely to require planning permission. An applicant should therefore ensure the design of units enables suitable storage for at least three streams of waste / recycling.</p>	5. A change to the kitchen once occupied is unlikely to result in requiring planning permission, therefore this requested change has not been incorporated into the final SPD. As the Council sets out in its response to the second point, it is a matter for building control to influence kitchen design and the	5. None.

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		<p>6. 4.2.1 Developments of traditional housing and blocks of up to five flats receive individual waste collection services and require suitable and sufficient space for the following containers for each household:</p> <p>GLA comments We note a small inconsistency here, and request confirmation on whether the highlighted text should both read 'two' or 'five' flats.</p>	<p>inclusion of paragraph 4.1.5 is not based on policy.</p> <p>6. The Council acknowledges that paragraph 4.2.1 mistakenly refers to five flats, instead of two.</p>	<p>6. The Council has made the following change to paragraph 4.2.1; "Developments of traditional housing and blocks of up to two flats receive individual waste collection services and require suitable and sufficient space for the organic, recyclable, and residual waste that will be generated when the development is occupied. The following number of containers for each household should be provided:"</p>
		<p>7. 4.2</p> <p>GLA comments We note that this section outlines the requirements for residual waste capacity, which should increase in relation to the more bedrooms that a property has. However, this isn't reflected in the capacity for recyclables, which remains the same. This means that a 4 bedroom property would be provided with 310l of capacity for residual whilst only having 110l for recycling (which will be further compounded by the retention of weekly residual waste collections in the borough).</p> <p>Recycling capacity should be at least the same (or more than) residual waste capacity.</p> <p>It is our view that the critical provision in planning terms is the inclusion of facilities to segregate waste and recycling in the home. Sufficient space should be given to ensure waste</p>	<p>7. The Council recognises that the SPD appears to allocate far more space for refuse compared to recycling; however, this is the basis for an overall space calculation (a similar response is set out in the response to the third point from the GLA). The Council have to plan for solid waste collection in case residents do not recycle at all. BS5906:2005</p>	<p>7. The Council have added a new paragraph (4.2.2) to say; "Suitable storage space for the container capacities provided above will enable the maximum likely weekly waste arisings for households to be stored as either organic, recyclable, or residual waste, as set out in Table 1 below."</p> <p>We have also amended paragraph 4.2.4 to read;</p>

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		<p>and recycling can be properly stored to allow residents to engage properly with the 'out of home' services.</p>	<p>does not provide guidance for appropriate recycling storage space calculations, however the Council go beyond BS5906:2005 by setting out recycling storage space requirements. Occupants will be entirely free to utilise proportions of the space for refuse & recycling to meet their actual needs and it is very unlikely that they will exceed both the refuse and recycling storage limits combined.</p>	<p>“Table 1 details the total storage space for solid waste and recycling containers requiring space at the front of each dwelling where practicable likely to be generated by each dwelling, although note that these figures are not prescriptive, and occupants may choose to recycle more.</p> <p>These changes have also been reflected elsewhere in the SPD.</p>
		<p><i>8. 6.1.1. However, the types and quantities of commercial/industrial wastes likely to be generated must be assessed and the proposed collection frequency must be known before the space requirements for commercial waste storage can be determined. Collections are assumed to be weekly in the absence of any binding commitment to having more frequent collections in perpetuity.</i></p> <p>GLA comments We note that developers won't necessarily know what types of businesses will be occupying those units.</p> <p>We note that from the national Defra Consistency agenda that businesses will be required to segregate their waste, so there must be enough space to accommodate this provision. The London Plan and the London Environment Strategy both have targets of 75% commercial waste recycling, which developers are required to address in their Operational Waste Management Plans as part of their Circular Economy Statement for referable applications, this should be reflected in below referable threshold developments.</p>	<p>8.a. In order to understand and assess the types and quantities of commercial/industrial wastes likely to be generated, the Council would normally seek to make reasonable assumptions based on the planning use class, referring to figures in BS 5906 where provided.</p> <p>8.b. The Council will make reference in paragraph 6.1.3 to the</p>	<p>8.a. The Council has made the following change to paragraph 6.1.1: “Similar principles apply to the requirements for household, commercial and industrial waste storage and collection. However, the types and quantities of commercial / industrial wastes likely to be generated must be assessed in line with British Standard 5906 and the proposed collection frequency must be known...”</p>

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			London Plan and the London Environment Strategy that set commercial waste recycling targets to be met by 2030. As a result, the relevant section of paragraph 6.1.3 is to be deleted.	8.b. The Council made the following change to paragraph 6.1.3: “Space for recycling should be suitable and adequate for the separate storage of a) paper/card; b) packaging containers (cans, glass bottles and jars, plastic bottles, pots, tubs and trays); and c) food waste for recycling should be available where these recycling streams are likely to form a significant proportion of the overall waste stream to ensure that the development design does not prevent occupants from recycling due to a lack of available space. The London Plan and the London Environment Strategy both have targets of 75% commercial waste recycling by 2030, which developers are required to address in their Operational Waste Management Plans as part of their Circular Economy Statement for referable applications.”
		9. 6.1.2. All developments producing commercial or industrial waste must have adequate refuse storage capacity for the total volume of waste likely to arise	9. Similar to previous comments, the Council	The Council made the following change to

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		<p><i>between collections, if recyclable waste is not presented for recycling by occupants.</i></p> <p>GLA comments We note that this doesn't take into account the incoming Defra Consistency reforms, and the following paragraph covers the allowance of space for separate recyclables, which could be interpreted as being contradictory.</p>	<p>will make it clearer that occupants do not always recycle, so storage space must be provided that can hold the likely total arisings of waste as refuse, with additional space for any recycling that takes place. For clarity, the Council will also make a change to paragraph 6.1.3.</p> <p>In practice, the proportion of the space occupied by recycling containers is likely to increase as the DEFRA consistency requirements will take effect (this is to be confirmed), and nothing in the SPD restricts their ability to do that.</p>	<p>paragraph 6.1.2: "All developments producing commercial or industrial waste must provide adequate space to store refuse storage capacity for the total weekly volume of solid waste likely to arise between collections, including suitable space to enable occupants to recycle."</p> <p>The Council has also made the following change to paragraph 6.1.3: "Space for recycling should be suitable and adequate for Additional space to enable the separate storage of a) paper/card; b) packaging containers (cans, glass bottles and jars, plastic bottles, pots, tubs and trays); and c) food waste for recycling..."</p>
		<p>10. 6.1.5 <i>Where the provision of adequate space to cope with weekly refuse and recycling collections is not practicable...more frequent collections.</i></p> <p>GLA comments We believe that the aim of this SPD should be to ensure developers to plan for this space in the first place and would recommend that more frequent collections are not suggested as an option to get around a lack of space due to the traffic and air quality impacts.</p>	<p>10. The Council recognises that weekly waste collections (as opposed to more frequent collections) could help reduce local issues with air quality, traffic congestion & waste collection related carbon impacts. However, unlike</p>	<p>The Council has changed paragraph 6.1.6 (formerly paragraph 6.1.5) as follows: "It is the Council's preference for commercial premises to be designed to cope with weekly waste collections. Where the provision of adequate space to cope with weekly</p>

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			household collections, commercial waste collections can be provided at just about any frequency.	refuse and recycling collections is not practicable however , this can potentially be addressed via a commitment to having more frequent collections in perpetuity. However, this solution is discouraged due to the associated adverse impacts on local traffic congestion, air quality and carbon emissions.”
		<p><i>11. 6.1.7. Food and drink establishments may consider the use of glass crushers in conjunction with their arrangements for recycling glass where space for waste storage is limited, subject to any noise related issues and collector requirements. It should be noted that glass crushers are not compatible with the Council’s commercial waste recycling service for mixed containers.</i></p> <p>GLA comments It should be noted that crushed glass collections pose their own collection challenges due to the weight of material and crushed glass is less able to be recycled in a closed loop due to the mixed types, more commonly being downcycled into aggregate, which is lower down the waste hierarchy. With this in mind consideration should be given to whether this is an appropriate recommendation. If it is we suggest that the SPD also references other compaction options such as a DMR compactor or cardboard baler which do not reduce the quality of the recycle or limit onward markets for the materials as glass crushers can do.</p>	11. The Council recognises the points put forward by the GLA and will simplify the guidance in relation to commercial and/or industrial waste and recycling.	11. The Council has deleted paragraph 6.1.7 of the draft SPD and any mention of glass crushers.
		<p><i>12. 6.1.8 The standard bin sizes provided in conjunction with these services are 240 litres, 360 litres, 660 litres, 770 litres and 1100 litres. Sack-based collection options are also available.</i></p> <p>GLA comments We would suggest removing and combining the current text at 6.1.8 with 6.1.9, i.e. ‘The Council offers various commercial waste recycling services, with information available at [X].</p>	<p>12.a. The Council will merge paragraphs 6.1.8 and 6.1.9 as suggested by the GLA.</p> <p>12.b. The Council’s waste service already offers a commercial</p>	12.a. The Council has merged former paragraphs 6.1.8 and 6.1.9 so that paragraph 6.1.8 reads “ The Council offers various commercial waste recycling services, with information

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		<p>There are many other licensed waste carriers offering commercial waste collections in the borough and commercial waste producers are free to choose their preferred service provider(s).'</p> <p>Consideration should be given to whether sack-based options are recommended or offered. Containerisation is known to increase recycling rates and sacks are often presented on street for collection, creating street management and litter challenges.</p>	<p>waste sack service for those businesses without suitable space for wheeled bins and/or only requiring small volume/occasional collections. Wheeled bins remain the Council's preference in all other scenarios.</p>	<p>available on the Council's website. There are many other licensed waste carriers offering commercial waste collections in the borough and commercial waste producers are free to choose their preferred service provider(s). It is the Council's preference that wheeled bins are used, but sack-based collection options are also available where the use of wheeled bins is not possible."</p>
		<p>13. 7.2.1 <i>Access for collection must be available from 6.00am to 7.00pm Monday to Saturday.</i></p> <p>GLA comments We seek clarity on whether this is specific to household bin stores - as many commercial waste collectors will operate outside of these hours, i.e. overnight rounds. Alternate collection times, where appropriately managed to limit noise disruption, can have a positive impact on congestion and air quality.</p>	<p>13. The Council agrees that a clarification should be made to this paragraph that the collection times of 6.00am to 7.00pm relate to household waste collection and that commercial waste can be collection outside of these times.</p>	<p>13. The Council has made the following change to paragraph 7.2.1: "Access for household waste collection must be available from 6.00am to 7.00pm Monday to Saturday, although arrangements can be made for commercial waste to be collected outside of these times, notwithstanding the requirements set out in Policy LP 8 of the Council's Local Plan, that all development should not result in impacts (e.g. noise) that are detrimental to the reasonable enjoyment of occupants of</p>

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		<p>14. N/A – Other Council best practice</p> <p>GLA comments LB Tower Hamlets have incorporated sections on ‘Occupier separation’ within their Reuse, Recycling & Waste SPD – see pages 31 and 32. We would suggest that LB Richmond do the same within the Refuse & Recycling Storage and Access Requirements for New Developments SPD.</p>	<p>14. The Council’s proposals in this SPD are based on British Standards and best practice having liaised with our waste operators. Many of the points raised in the SPD by LB of Tower Hamlets are based on British Standards and therefore are replicated in the Council’s draft SPD (e.g. distance to waste storage, lighting of storage areas, accessibility for residents).</p>	<p>new, existing, adjoining and neighbouring properties.”</p> <p>14. None.</p>
4	Katie Parsons – Historic England	<p>Thank you for consulting us on the above Draft Refuse & Recycling Storage and Access Supplementary Planning Document (SPD). We have no comments to make on the proposed SPD in historic environment terms. If any specific heritage issues arise as a result of the consultation please not hesitate to contact us.</p>	Noted.	None.
5	Janice Burgess – National Highways	<p>Thank you for your notification dated 22 July 2022, inviting National Highways to comment on the draft Supplementary Planning Documents; seeking responses no later than 05 September 2022.</p> <p>National Highways has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such National Highways works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.</p>	Noted.	None.

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		<p>We will therefore be concerned with proposals that have the potential to impact the safe and efficient operation of our network.</p> <p>National Highways have undertaken a review of the documents and raise no concerns.</p>		
6	Katie Smyth – Surrey County Council	<p>Thank you for consulting Surrey County Council as the Minerals and Waste Planning Authority in relation to the Draft Local Views SPD and Draft Refuse and Recycling Storage Requirements SPD consultations.</p> <p>Please note we have no comments to raise in relation to the above consultation.</p>	Noted.	None.
7	Teddington Society Planning Group	<p>The Teddington Society Planning Group, would like to provide input to this draft SPD.</p> <p>We refer to Table 1 in the document. Given the drive to encourage more of our waste to be re-cycled, we are surprised at the balance of waste storage capacity allocated to recycling bins as opposed to that allocated to general waste bins. We do not believe that the overall waste storage capacity is incorrect just that the balance should allow for increase in the number recycling containers and, perhaps reduced number of general waste containers.</p>	<p>Residents and businesses are encouraged to recycle but may not always do so; therefore, as the Waste Planning Authority responsible for planning waste collection, LBRuT must assume that all waste is deposited as refuse and therefore allocate the total storage space required for waste arisings as refuse storage. The Council do however also require additional separate storage for recycling as a requirement of this SPD should residents choose to recycle.</p> <p>The Council has made changes to paragraphs</p>	<p>The changes set out below have already been recorded in this table but are repeated here in response to the comments raised.</p> <p>The Council has replaced paragraph 3.1.2 with the following paragraph; “There must be sufficient space to store the total weekly volume of solid waste likely to arise between collections, including suitable storage space to enable residents to recycle. Table 1 below sets out the total solid waste container storage space required for each dwelling and therefore in each development, but in practice, the ratio of refuse and recycling containers</p>

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			<p>3.1.2 and 4.2.2 that set out this requirement and state that occupants of buildings are free to recycle more than the figures set out in Table 1 indicates should they wish to do so. Paragraph 4.2.4 states that the figures provided in Table 1 are not prescriptive.</p>	<p>can be determined according to the needs of occupants.”</p> <p>The Council have added a new paragraph (4.2.2) to say; “Suitable storage space for the container capacities provided above will enable the maximum likely weekly waste arisings for households to be stored as either organic, recyclable, or residual waste, as set out in Table 1 below.”</p> <p>We have also amended paragraph 4.2.4 to read; “Table 1 details the total storage space for solid waste and recycling containers requiring space at the front of each dwelling where practicable likely to be generated by each dwelling, although note that these figures are not prescriptive, and occupants may choose to recycle more.</p> <p>These changes have also been reflected elsewhere in the SPD.</p>

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8	The Royal Parks – Julia Frayne	The Royal Parks does not have comments on the detail of the draft Refuse & Recycling Storage Requirements SPD, but supports regular updates of this document in principle. Clarifying current requirements should help ensure that appropriate measures are incorporated into planning proposals from the outset.	Noted.	None.