

RICHMOND UPON THAMES LOCAL PLAN
Publication consultation on the Council's final version of the Plan and final SA report
(Regulation 19)
RESPONSE FROM THE OLD DEER PARK WORKING GROUP

Response from the Old Deer Park Working Group, dated 31 July 2023 (extension granted by Richmond upon Thames Council ref email from [REDACTED] to Peter Willan dated 20 July 2023)

OLD DEER PARK WORKING GROUP

Personal Details:

Title	Messrs
Name	Peter Willan, Paul Velluet
Organisation	Old Deer Park Working Group
Address	[REDACTED]
Telephone	[REDACTED]
E-mail address	[REDACTED]

The Old Deer Park Working Group (the Group) comprises representatives of The Richmond Society, The Kew Society, The Friends of Richmond Green, The Friends of Old Deer Park and The St Margaret's Estate Residents Association. This submission represents the joint response from the Group.

The Group was formed in 2012 in recognition of the particular ecological, historical and recreational importance of the Old Deer Park and has since then worked for encouraging and securing the preparation of a coherent strategy for the effective conservation, development and management of the Park. In June, 2012, the Group published its report: The Old Deer Park, Richmond - Re-connecting the Town to its local park - Realising an under-recognised parkland asset - A framework for conservation and enhancement. Since then, it has made a number of submissions to the Richmond upon Thames Council (Council) on related issues. In this connection and importantly, the Group worked collaboratively with the Council and its consultants on the preparation of the Old Deer Park Supplementary Planning Document (as published in March, 2018). The Group has also worked, and continues to work, collaboratively with the Council on the planning and implementation of projects for the enhancement of the Park, including the award-winning scheme for improvements at and adjacent to the Park Lane entrance to the Old Deer Park Car-park. The Group is currently working with the Council to link the Old Deer Park car park with the river Thames along the area between the A316 road and the railway. It is working with the Council on tree planting and with Thames Landscape Strategy in rewinding the ODP section of Thames Arcadia.

BASIS OF RESPONSE

The Group has examined the schedule of extracts from the Council's Consultation Statement of June 2023 detailing responses from the Group in January 2022 to the Pre-Publication draft Local Plan and the Council's responses. The schedule was prepared by the Council and emailed to the Group on 20 July 2023. The schedule is attached as Annex 1.

We attach the Old Deer Park Working Group's full response to the Pre-Publication draft Local Plan 2022 for reference in Annex 2. The Site Allocation numbering has changed in the current draft Local Plan by one (e.g. Site Allocation 26 is now 27). The 2022 response referred to Arup's

Urban Design Study 2021 and Arup's Metropolitan Open Land Review Annex Report, which have both been updated in 2023. Our 2022 responses remain unchanged notwithstanding the updates of the Arup reports.

Circumstances existing in January 2022 continue to evolve, especially in regard to Government Planning Policy but also in regard to policy drivers such as housing demand, economic, commercial and high street recovery from the pandemic. The pace of change makes it hard for a Local Plan to keep up. However, we are not suggesting any changes to the substance of the outstanding issues.

We responded in September 2022 to the Council's consultation on a draft SPD Local Views. Our understanding from Joanne Capper in her aforementioned email of 20 July 2023 is that it is the Local Plan which has to formally designate a 'new' view (i.e the name of that view and it being shown on the Policies Map), so the Council has put the draft Local Views SPD 'on hold' until they know what the Inspector will recommend as part of the Local Plan process (they will confirm the designation of new views). Once that is clear, the Council can pick up the details again in the Local Views SPD (i.e. take it to adoption, or a further consultation if it is considered necessary, which will include revisiting/producing the detailed proformas for each view). We wish to include as part of our response to the draft Local Plan the proposed views and related issues in our 2022 response on the draft SPD and accordingly include our response to the draft SPD on Local Views as Annex 3.

We note and welcome the Council's responses to our representations: **45, 86, 130, 163, 198, 215, 638, 679, 794, 879, 886, 927, 954, 955 and 1013.**

We note and are disappointed and concerned by the Council's failure to respond positively to our following representations and accordingly must maintain our objections to the Local Plan - Publication Version for the reasons set out in our previously submitted comments: **212, 218, 242, 278, 589, the un-numbered item between items 596 and 597, 620, 634, 674, 866, 930, 1018, 1034, 1035 and the final un-numbered item in the schedule.**

Given the substantial and undue reliance given in the Plan to Arup's Urban Design Study, 2021 (as updated in 2023) and to Arup's Metropolitan Open Land Annexe Report Review of 2021 (as updated in 2023), and the questionable aspects of the documents on which we commented critically in January, 2022, we would urge that the 2023 versions of both documents should be considered in detail by the Inspector in considering the Local Plan - Publication Version.

Signed:

Peter Willan, BSc Eng(Hons), MBA, ARSM, FCMA, FEI, HonRCM

Paul Velluet, B.A. Hons, B.Arch. Hons, M.Litt., R.I.B.A., I.H.B.C.

31 July 2023

Attached:

Annex 1 Schedule of extracts from the Council's Consultation Statement June 2023

Annex 2 Old Deer Park Working Group's full response to the Pre-Publication draft Local Plan 2022

Annex 3 Old Deer Park Working Group's response to the draft SPD on Local Views 2022

Extracts from the [Consultation Statement](#) – comments from Prospect of Richmond, FoRG and the ODPWG

(Note there were separate tables with responses to some of the specific questions raised in the consultation, with the last table showing all the detailed responses in Plan order.)

Table 1: All responses received (to question 4 on the [response form](#)) in relation to the strategic vision (section 3 of the draft Plan) (as received) and the Council's officer response

Rep No.	Name	Comment	Council's response
12	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	We agree broadly with the Strategic Vision but with a number of caveats referred to in this response.	Support noted.
42	Vivien Harris, Friends of Richmond Green	<p>The Friends of Richmond Green (FoRG) is an amenity action group. Our key aims and objectives are:</p> <ul style="list-style-type: none"> • to promote public interest and civic pride in Richmond Green and vicinity • to improve the quality of life and long-term attractiveness for residents • to improve the character and quality of the built and natural environments • to improve the cleanliness and appearance of the streets and public spaces • to contain traffic while recognising the parking needs of residents and visitors • to encourage responsible use of The Green and surrounding area <p>FoRG as an amenity group is over 50 years old and is run by an executive committee based on a formal constitution. The Friends of Richmond Green fully endorse and support the response by Prospect of Richmond to the new draft Local Plan. We have read the response and have been engaged with the respondents on the content. For clarification, the response is a Prospect of Richmond response with Friends of Richmond Green support and endorsement.</p>	Noted.
45	Peter Willan and Paul Velluet, Old Deer Park Working Group	We agree broadly with the Strategic Vision but with a number of caveats referred to in this response.	Support noted.

Table 2: All responses received (to question 5 on the [response form](#)) in relation to the strategic objectives (section 3 of the draft Plan) (as received) and the Council's officer response

Rep No.	Name	Comment	Council's response
58	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	We agree broadly with the Strategic Objectives but with a number of caveats referred to in this response.	Noted.

Off

86	Peter Willan and Paul Velluet, Old Deer Park Working Group	We agree broadly with the Strategic Objectives but with a number of caveats referred to in this response.	Noted.
----	--	---	--------

Table 3: All responses received (to question 6 on the [response form](#)) in relation to Policy 1. Living Locally and the 20-minute neighbourhood (section 4 of the draft Plan) (as received) and the Council's response

Rep No.	Name	Comment	Council's response
97	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	We agree broadly with Policy 1 and the 20-minute neighbourhood.	Support noted.
130	Peter Willan and Paul Velluet, Old Deer Park Working Group	We agree broadly with Policy 1 and the 20-minute neighbourhood.	Support noted.

Table 4: All responses received (to question 7 on the [response form](#)) in relation to Policy 2. Spatial Strategy: Managing change in the borough (section 4 of the draft Plan) (as received) and the Council's response

Rep No.	Name	Comment	Council's response
141	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	We agree broadly with Policy 2, Spatial Strategy: Managing Change in th borough.	Support noted.
163	Peter Willan and Paul Velluet, Old Deer Park Working Group	We agree broadly with Policy 2, Spatial Strategy: Managing Change in th borough.	Support noted.

Table 5: All responses received (to question 8 on the [response form](#)) in relation to the place-based strategies (sections 6 to 14 of the draft Plan) (as received) and the Council's response

Rep No.	Name	Comment	Council's response
---------	------	---------	--------------------

Off

171	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	Our response here on the Place-based Strategy: Richmond Town and Richmond Hill and Policy 28 – Local character and design quality (Strategic Policy) explains where we disagree.	Noted.
198	Peter Willan and Paul Velluet, Old Deer Park Working Group	Our response here on the Place-based Strategy: Kew and on Policy 28 – Local character and design quality (Strategic Policy) explains where we disagree. [See comment 620 on the place-based strategy for Kew]	Noted.

Table 6: All responses received (to questions 9/10/11 on the [response form](#)) in relation to general comments on the Local Plan (detailed policies etc) (as received, in Plan order) and the Council's response

Rep No.	Full Name	Part of plan commenting on	Detailed Comments	Council's response
212	Peter Willan and Paul Velluet, Old Deer Park Working Group	General (in relation to title of the Plan, page numbers)	Local Plan covers the entire Borough so the Title should be Richmond-upon-Thames Local Plan and not simple Richmond Local Plan. Needs remedying. Despite the page-numbers given in what appears to be the list of contents – but is not headed as such – there is no pagination in the entire document. Needs remedying. The lists of page-numbers in the un-headed list of contents and the headed list of policies should be headed as such. Needs remedying.	The shortened reference to the Richmond Local Plan is considered acceptable as it is clear it is a boroughwide plan. The main audience is expected to view the Plan online (either as a pdf where the hyperlinks aid navigation and page numbers appear, or using a web-based html version which has a navigation pane), but it is intended that page numbers will be added to the final version.
213	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	General (in relation to title of the Plan, page numbers)	Local Plan covers the entire Borough so the Title should be Richmond-upon-Thames Local Plan and not simple Richmond Local Plan. Needs remedying. Despite the page-numbers given in what appears to be the list of contents – but is not headed as such – there is no pagination in the entire document. Needs remedying. The lists of page-numbers in the un-headed list of contents and the headed list of policies should be headed as such. Needs remedying.	See response to comment 212.
214	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	General comment (in relation to Policies Map)	Neither Section 2 nor Section 15 appears to included any reference to a Policies Map. Referring to the note contained under 'Policies Map for the Local Plan Review, 2015-2018' in the part of the Council's current Planning Policy web-site dealing with the current 'Adopted Local Plan' (adopted in July, 2018), it is clearly stated that 'The Council's Policies Map (formerly called the Proposals Map) will be updated in 2020 to reflect the Local Plan adopted in July, 2018 and March, 2020'. However, to date, this has never been done. There is no published Policies (formerly Proposals) Map beyond that published in July 2015. Prospect of Richmond has picked-up this omission in previous submissions. The omission needs to be urgently remedied.	Paragraph 2.18 referred to the Policies Map, with the document explaining it indicates the proposed changes to the Policies Map. There was a delay to the update of the existing Policies Map to reflect the Local Plan adopted in July 2018 and March 2020; an interactive map which displays the designations and a PDF version (due to its large file size only a low resolution version is available online).

Off

215	Peter Willan and Paul Velluet, Old Deer Park Working Group	General comment (in relation to Policies Map)	Neither Section 2 nor Section 15 appears to include any reference to a Policies Map. Referring to the note contained under 'Policies Map for the Local Plan Review, 2015-2018' in the part of the Council's current Planning Policy web-site dealing with the current 'Adopted Local Plan' (adopted in July, 2018), it is clearly stated that 'The Council's Policies Map (formerly called the Proposals Map) will be updated in 2020 to reflect the Local Plan adopted in July, 2018 and March, 2020'. However, to date, this has never been done. There is no published Policies (formerly Proposals) Map beyond that published in July 2015. Prospect of Richmond has picked-up this omission in previous submissions. The omission needs to be urgently remedied.	See response to comment 214.
217	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	General comment (in relation to evidence base)	So much in the Draft Local Plan derives from questionable analysis and questionable recommendations in Arup's Urban Design Study and, in more limited part, this in Arup's 156-page Metropolitan Open Land Review Annexe Report. Indeed, all these need to be firmly challenged.	Noted. A relevant and up-to-date evidence base underpins the Plan. See also response to comment 594 regarding the methodology underpinning the Urban Design Study. See also response to comment 929 regarding points raised on the MOL review.
218	Peter Willan and Paul Velluet, Old Deer Park Working Group	General comment (in relation to evidence base)	So much in the Draft Local Plan derives from questionable analysis and recommendations in Arup's Urban Design Study and, in more limited part, this in Arup's 156-page Metropolitan Open Land Review Annexe Report. Indeed, all these need to be firmly challenged.	See response to comment 217.

241	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	Paragraphs 2.44 and 2.45, in relation to Heathrow	<p>We propose Heathrow noise be given much more weight in the Local Plan, especially in response to the re-allocation of flight paths from Airspace Modernisation and the introduction of air taxis and drones. This is dealt with reference to the Introduction paragraphs 2.44 and 2.45.</p> <p>The only reference to Heathrow in the Local Plan is in Introduction Section 2.44 and 2.45, where it is stated that '<i>The Council, in line with the Mayor of London, strongly opposes any further expansion at Heathrow and supports measures to minimise the impacts of Heathrow, particularly on traffic, noise and air quality. The Council's position on Heathrow is set out in the Corporate Plan 2018 – 2022. This sets out that the Council remain opposed to the Government's decision to expand Heathrow Airport, a third runway and further night flights...</i>' '<i>The Council's Local Plan does not contain a policy on Heathrow as the airport does not lie within the borough boundary.</i>'</p> <p>There is an SPD: Development Control for Noise Generating and Noise Sensitive Development, 2018, which refers to Heathrow but in our view is substantially deficient in this respect.</p> <p>Government/CAA required Airspace Modernisation is fully underway with potentially substantial changes to flight path noise allocation, while Heathrow expansion is on hold and may never take place. The airspace is an important "asset" above Richmond residents (not only for Heathrow traffic but increasingly for air taxis, drones, etc).</p> <p>There is a set of Rules established by ICAO (the UN aviation body) for noise management which is the Balanced Approach. It sets the priorities - starting with reduction of noise at source (i.e. less noisy aircraft), followed by land use, operations and finally restricting traffic movements. Land use is about not developing housing and vulnerable uses and/or mitigating noise where there is significant noise impact on health and well being from overflight.</p> <p>There are other national noise policies that could be deployed to deal with Heathrow noise.</p> <p>At the moment the Noise England Statement on Noise 2010 uses a threshold of 51 decibels (LAeq) for daytime. Heathrow aircraft noise levels in Richmond borough are at least 60 dbA in some places. WHO Guidance threshold levels are 45 dbA day and 40dbA night.</p> <p>Under these circumstances, and given our long involvement as Richmond Heathrow Campaign, we recommend the Council develop a Planning Approach and Policy to deal with housing and other developments exposed to noise from Heathrow aircraft and from the emerging air taxis and drones. A number of developments, such as at Manor Road and Stag Brewery would be significantly affected by aircraft noise, especially on arrivals under the Heathrow landing flight paths. But Airspace Modernisation will affect the whole borough potentially and while the 4 year process takes place there will be uncertainty and blight.</p> <p>We are engaged with Heathrow and other local authorities on this topic and would be pleased to contribute to Richmond council's future deliberations.</p>	<p>As stated in the Plan, the airport does not lie within the borough boundary and therefore there is not a policy on Heathrow.</p> <p>Update the references to the Council's position to reflect the Corporate Plan 2022 – 2026.</p> <p>The UK Civil Aviation Authority has set out a vision for the future of UK airspace in January 2023 to help deliver quicker, quieter and cleaner journeys, as well as create more capacity for the benefit for those who use and are affected by UK airspace. The aviation and aerospace regulator has developed a refreshed Airspace Modernisation Strategy, which includes measures to introduce environmental sustainability as an overarching principle to be applied through all modernisation activities, and to provide a clear strategic path for regulatory policy and requirements. It makes it clear that the role of airspace modernisation in respect of noise impacts will be considered, and can be responsible for delivering noise reduction where it has an element of control.</p>
-----	---	---	---	---

242	Peter Willan and Paul Velluet, Old Deer Park Working Group	Paragraphs 2.44 and 2.45, in relation to Heathrow	<p>We propose Heathrow noise be given much more weight in the Local Plan, especially in response to the re-allocation of flight paths from Airspace Modernisation and the introduction of air taxis and drones. This is dealt with reference to the Introduction paragraphs 2.44 and 2.45.</p> <p>The only reference to Heathrow in the Local Plan is in Introduction Section 2.44 and 2.45, where it is stated that <i>'The Council, in line with the Mayor of London, strongly opposes any further expansion at Heathrow and supports measures to minimise the impacts of Heathrow, particularly on traffic, noise and air quality. The Council's position on Heathrow is set out in the Corporate Plan 2018 – 2022. This sets out that the Council remain opposed to the Government's decision to expand Heathrow Airport, a third runway and further night flights,..'</i> <i>'The Council's Local Plan does not contain a policy on Heathrow as the airport does not lie within the borough boundary.'</i></p> <p>There is an SPD: Development Control for Noise Generating and Noise Sensitive Development, 2018, which refers to Heathrow but in our view is substantially deficient in this respect.</p> <p>Government/CAA required Airspace Modernisation is fully underway with potentially substantial changes to flight path noise allocation, while Heathrow expansion is on hold and may never take place. The airspace is an important "asset" above Richmond residents (not only for Heathrow traffic but increasingly for air taxis, drones, etc).</p> <p>There is a set of Rules established by ICAO (the UN aviation body) for noise management which is the Balanced Approach. It sets the priorities - starting with reduction of noise at source (i.e. less noisy aircraft), followed by land use, operations and finally restricting traffic movements. Land use is about not developing housing and vulnerable uses and/or mitigating noise where there is significant noise impact on health and well being from overflight.</p> <p>There are other national noise policies that could be deployed to deal with Heathrow noise.</p> <p>At the moment the Noise England Statement on Noise 2010 uses a threshold of 51 decibels (LAeq) for daytime. Heathrow aircraft noise levels in Richmond borough are at least 60 dbA in some places. WHO Guidance threshold levels are 45 dbA day and 40dbA night.</p> <p>Under these circumstances, and given our long involvement as Richmond Heathrow Campaign, we recommend the Council develop a Planning Approach and Policy to deal with housing and other developments exposed to noise from Heathrow aircraft and from the emerging air taxis and drones. A number of developments, such as at Manor Road and Stag Brewery would be significantly affected by aircraft noise, especially on arrivals under the Heathrow landing flight paths. But Airspace Modernisation will affect the whole borough potentially and while the 4 year process takes place there will be uncertainty and blight.</p> <p>We are engaged with Heathrow and other local authorities on this topic and would be pleased to contribute to Richmond council's future deliberations.</p>	See response to comment 241.
-----	--	---	---	------------------------------

278	Peter Willan and Paul Velluet, Old Deer Park Working Group	General comment (in relation to sustainable growth)	<p>Sustainable Growth. We responded to the Direction of Travel Consultation in 2020, wherein we questioned the need and advisability of replacing the Local Plan 2018 so soon. One of the four reasons then given by the Council was population growth but according to the Retail and Leisure Needs Study (2021), Richmond Borough population of 199,630 in 2021 is estimated to grow by only 2.8% to 205,200 in 2039. The estimate for Richmond Town and surrounding area (Zone 1) is for a decrease in population from 23,031 in 2021 to 22,536 in 2039. The absence of population growth feeds through into housing and into, retail, food/beverage and leisure uses and employment, housing, etc. in Richmond Town, so the estimates are important for the Local Plan. We comment on the Uses of Richmond Town in reference to Policy 18. In view of the very limited estimated growth in population in Richmond Borough and a small decrease in Richmond Town and surrounding area (Zone 1) we believe it is important to emphasise "Improvement" as well as Growth. While population numbers may not grow there will be elements of the Local Plan where there is growth and elements where there is decline. Even without population growth, it is to be expected that there will be increasing prosperity and increasing disposable income and therefore growth in the uses of Richmond Town.</p>	<p>Update the supporting text in section 2 setting out the Strategic Context and Trends to refer to the 2021 census and latest projections. There has been weaker population growth than the ONS had been predicting, but almost three quarters of population growth has been accounted for by those aged 65 and over. The latest GLA projections (2020-based) estimate much lower population growth, to reach 196,714 (identified capacity scenario), a 0.3% change by 2039. However, there remains uncertainty, with the GLA suggesting there could be stronger migration and a rebound from the pandemic. It is clear that population change remains a significant challenge, with a projected change in the age structure of those aged 65+ to increase by 50% by 2039. It is not considered necessary to look at a lower geographical scale for population change, because for example the spending in Zone 1 is not drawn just from the residents of Zone 1.</p>
279	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	General comment (in relation to sustainable growth)	<p>Sustainable Growth. We responded to the Direction of Travel Consultation in 2020, wherein we questioned the need and advisability of replacing the Local Plan 2018 so soon. One of the four reasons then given by the Council was population growth but according to the Retail and Leisure Needs Study (2021), Richmond Borough population of 199,630 in 2021 is estimated to grow by only 2.8% to 205,200 in 2039. The estimate for Richmond Town and surrounding area (Zone 1) is for a decrease in population from 23,031 in 2021 to 22,536 in 2039. The absence of population growth feeds through into housing and into, retail, food/beverage and leisure uses and employment, housing, etc. in Richmond Town, so the estimates are important for the Local Plan. We comment on the Uses of Richmond Town in reference to Policy 18. [see comment 805 in relation to Policy 18] In view of the very limited estimated growth in population in Richmond Borough and a small decrease in Richmond Town and surrounding area (Zone 1) we believe it is important to emphasise "Improvement" as well as Growth. While population numbers may not grow there will be elements of the Local Plan where there is growth and elements where there is decline. Even without population growth, it is to be expected that there will be increasing prosperity and increasing disposable income and therefore growth in the uses of Richmond Town.</p>	<p>See response to comment 278.</p>

586 Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)

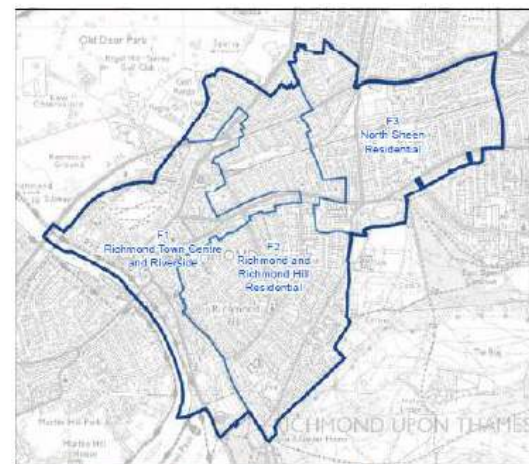
Prospect of Richmond is a group of local residents that have extensive knowledge and experience of living in or near Richmond Town and the surrounding area. Two of us have been past chairs of the Richmond Society and one a past chair of the Friends of Richmond Green and one of us chairs the Richmond Heathrow Campaign comprising the Richmond Society, Kew Society and the Friends of Richmond Green. While not part of this response we have extensive involvement with the adjacent Old Deer Park. Two are architects. Individually and together, we have been involved with many planning, licensing, traffic, heritage, charity, cultural and other matters. We are dedicated to the preserving and improving the area for the benefit of residents and other stakeholders. Over many years we have engaged extensively with Richmond-upon-Thames Council and are keen to continue doing so.

Place Definitions. We refer to Richmond Town as comprising the Conservation Areas for Richmond Town Centre, Richmond Green, Richmond Riverside and Richmond Hill. The use, character and value of the four components of Richmond are very different but it is this diversity, side by side in a relatively small area, that is so valuable. The whole is greater than the sum of the parts.

Local Plan Section 11 heading is 'Place-based Strategy for Richmond & Richmond Hill'. The study area is defined as 'Richmond Town Centre and Riverside, and the residential and mixed use areas into Richmond Hill and North Sheen'. These are character areas F1, F2 and F3 in the Urban Design Study 2021'. 'Richmond Town Centre and Riverside' (F1) is described as including Richmond Green. We believe the four components of Richmond Town should be separately identified in line with the boundaries of the Conservation Areas for Central Richmond, Richmond Green, Richmond Riverside and Richmond Hill and that the character areas should match the Conservation Area boundaries.

Confusingly, the extant 'Richmond & Richmond Hill Village Plan' (2016) comprises all four areas plus Richmond and Richmond Hill residential (F2), North Sheen Residential (F3) and the Old Deer Park which is included in the Local Plan as Placed Based Strategy for Kew and has its own Old Deer Park Conservation Area Statement and SPD. We note parts of the two Riverside Conservation Areas are on the Twickenham side of the river Thames whereas the Local Plan boundary appears to be the centre of the river.

We have extracted the Character Area Map from Arup's Urban Design Study Dec 2021 and provided a Conservation Area Map so that members of the community reading our response can better understand the context.



Richmond & Richmond Hill. Urban design Study Dec 2021

				<p>Amend text in the character area profile to explicitly refer to the four conservation areas as being at the core of the town centre character area. Conservation areas and character areas represent different judgements and priorities. Whilst conservation areas aim to define aspects of heritage value, character areas aim to define areas of similar character. For consistency and ease of use, in general the character areas in the Urban Design Study 2021 aimed to follow conservation area boundaries wherever possible. However, Richmond was an example of where the conservation areas did not completely align with character – for example Richmond Riverside and Richmond Hill extend across the river into East Twickenham, and part of the Richmond Hill CA covers the riverside. The Richmond Hill CA also extends further to the south-east and encompasses areas which do not have a town centre character. Further, the character area boundary considered the town centre boundary which also does not align with conservation areas boundaries. It is overall considered that the current character areas are appropriate and no further changes are recommended.</p>
587	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	Place-based Strategy for Richmond & Richmond Hill	In the un-headed list of contents Section 3 is titled 'Place-based Strategy for Richmond & Richmond Hill' whereas it should be titled as 'Richmond Town Centre and Riverside, Richmond and Richmond Hill Residential and North Sheen Residential' – assuming that one accepts the highly questionable concept and structure of 'Character Areas (sic) as set out in Arup's 432-page Urban Design Study. Needs remedying.	The Urban Design Study divides the borough into nine high level 'places' which have been used to name the place-based strategies, as set out at the start of section 3 in the Urban Design Study. For simplicity these do not replicate in full the names of the 36 locally distinctive character areas. No amendments to the place-making strategy are considered necessary.

<p>588</p>	<p>Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)</p>	<p>Place-based Strategy for Richmond & Richmond Hill in relation to Richmond BID.</p>	<p>We note the explicit reliance on the RBID and its Vision in the Local Plan Section 11 Place-Based Strategy for Richmond and Richmond Hill but we have not been able to find the Vision Report as evidence and are concerned that since the RBID is established by businesses alone and not residents there is likely to be a bias in favour of businesses. Also, the areas covered by the RBID are parts of Richmond Town Centre and not Richmond Green, for example where we wholly oppose commercial use, other than in the context of mixed use along Greenside. We are concerned that the democratic process may be at risk and while we are not saying this is intentional, we believe the matter needs to be resolved going forward. In so far as our response here is concerned, without the evidence we are not able to make a reasoned response on the RBID Vision included in the draft Local Plan at Placed-based Strategy- Richmond and Richmond Hill.</p>	<p>The policy mentions the current BID in the 'other initiatives' section but there is not a reliance on their work to inform the Local Plan; rather, there is a recognition that a BID exists and there has been work to set out a vision for a thriving town centre. They are a key stakeholder. That a BID has been set up to represent participating businesses, and that the BID is referenced in the Local Plan as an initiative which promotes Richmond, does not mean that the Plan itself is biased towards businesses at the expense of residents, the basis for which is based on the Council's own evidence base. Further information about Be Richmond BID can be found on their website: https://berichmond.london/member-support/about-be-richmond. Note that BIDS are funded by a mandatory levy on eligible businesses after a successful ballot in which businesses vote; the maximum period for the levy is 5 years, and to continue their activities a new ballot must be held. The preparation of the Local Plan and its implementation is the statutory responsibility of the Council in its role as local planning authority, subject to full consultation and independent Examination in line with statutory requirements. It is not considered that any amendments to the policy are required.</p>
------------	--	---	---	--

589	Peter Willan and Paul Velluet, Old Deer Park Working Group	General comment in relation to Old Deer Park	<p>The Old Deer Park Working Group (the Group) comprises representatives of The Richmond Society, The Kew Society, The Friends of Richmond Green, The Friends of Old Deer Park and The St Margaret's Estate Residents Association. This submission represents the joint response from the Group.</p> <p>The Group was formed in 2012 in recognition of the particular ecological, historical and recreational importance of the Old Deer Park and has since then worked for encouraging and securing the preparation of a coherent strategy for the effective conservation, development and management of the Park. In June, 2012, the Group published its report: The Old Deer Park, Richmond - Re-connecting the Town to its local park - Realising an under-recognised parkland asset – A framework for conservation and enhancement. Since then, it has made a number of submissions to the Council on related issues. In this connection and importantly, the Group worked collaboratively with the Council and its consultants on the preparation of the Old Deer Park Supplementary Planning Document (as published in March, 2018). The Group has also worked, and continues to work, collaboratively with the Council on the planning and implementation of projects for the enhancement of the Park, including the recently completed, award-winning scheme for improvements at and adjacent to the Park Lane entrance to the Old Deer Park Car-park. The Group is currently working with the Council to link the Old Deer Park car park with the river Thames along the area between the A316 road and the railway. It is working with the Council on tree planting and with Thames Landscape Strategy in rewilding the ODP section of Thames Arcadia.</p> <p>Richmond Town. We recommend that the Old Deer Park should be covered by its own Character Area but the park's access from Richmond Town and proximity encourage the consultation response from the Prospect of Richmond on Richmond Town to be considered alongside this response from the Old Deer Park Working Group on the Old Deer Park.</p>	<p>It is not considered that the Old Deer Park warrants its own character area. The borough-wide study undertaken by Arup as part of the Urban Design Study 2021 is necessarily at a broad scale. A finer grain of detail would be reflected within a more detailed character assessment. It is therefore not considered that any amendments to the existing character areas and boundaries are necessary.</p>
-----	--	--	---	--

596	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	Site allocation 24: Richmond Station, Richmond	<p>Both the title and the draft text of this Site Allocation need substantial amendment.</p> <p>The title should refer specifically not only to the Station, but also to the post-War, multi-storey NCP car-park to the south of the Station, the post-War parade of single-storey shops fronting The Quadrant (at nos. 27.B to 27.G) and the post-War office-block fronting Drummond's Place to the south and south-west of the Station, to the post-War parade of shops fronting Kew Road (at nos. 2 to 8 consec.) and the offices above (Westminster House) to the north of the Station, and the surface-level car-park to the north of the Station. A clear distinction needs to be made between proposals directly affecting the Station (together with the tracks and present day-lit, open-air platforms) and those affecting the other buildings and space referred to above. Whilst such proposals need to be coherent, they need to have regard to the substantially different considerations that apply to the present, very fine, locally listed Southern Railway Station complex (and not merely to its front façade to Kew Road and the upper booking-hall), completed in 1937, which is clearly worthy of statutory listing, together with the very fine 19th century platform-canopies serving platforms 4 and 5 and 6 and 7. Given the particular heritage significance of the Station complex - as distinct from the lack of heritage significance of the other buildings and space around the Station (the multi-storey car-park to the south of the Station, the parade of single-storey shops and the office-block fronting The Quadrant and Drummond's Place to the south and south-west of the station, the parade of shops and the offices above fronting Kew Road to the north of the Station, and the surface-level car-park to the north of the Station), there is clearly no scope whatever for the redevelopment of the existing Station complex - or for decking-over the tracks and the present day-lit, open-air platforms.</p> <p>However, this is not to suggest that there is no scope to enhance the existing Station complex - principally by carefully reinstating and restoring its original and very distinctive architectural interest and integrity, which has long remained a desirable objective, involving the removal of a series of damaging alterations carried out over recent years. Importantly, too, any proposed decking-over of the existing platforms and tracks and the resulting loss of daylighting and natural ventilation for the travelling public would not only have a massive and damaging impact on the amenity presently enjoyed by the public using the Station, but would also be wholly inconsistent with current national, London-wide and local sustainability interests. Most importantly, any significant increase in retail, leisure and/or entertainment uses on the site is most likely to harm damage the viability and vitality of the existing and long-established retail, leisure and entertainment in the heart of the Town to the south by drawing people away from The Quadrant, George Street, Sheen Road, The Square, Duke Street, King Street, Red Lion Street, Hill Street and Bridge Street. Similarly, any significant increase in retail, leisure and/or entertainment uses on the site is likely to necessitate a significant level of vehicular servicing that could only be provided via The Quadrant or Kew Road.</p> <p>Given the fundamentally flawed analysis and recommendations contained in the relevant parts of Arup's Urban Design Study to which repeated references are made in the draft Local Plan, the suggested suitability of the Station site and its immediate setting as 'a tall building zone (7-8 storeys)... with the opportunity for a landmark building' is wholly unacceptable, unrealistic and needs to be omitted altogether.</p> <p>Importantly, there is a clear need to fundamentally review and revise the current Development Brief for the Station site which dates back to March, 2002.</p>
-----	---	--	--

			<p>The Site Allocation comprises Richmond Station, the railway tracks to the rear, Gateway House and the multi-storey car park to the south, and Westminster House and open car park to the north. No changes to the wording are therefore required in this regard.</p> <p>See response to comment 595 with regards the heritage status of the station and the aspects of the site which are considered to most positively contribute to its designation and setting. The text as proposed would not preclude a development from coming forward which does not include the station, and vice versa. It is therefore not considered that any amendments to the wording are required.</p> <p>With regards the impact of a retail offer on site, commercial/retail uses are considered appropriate given the town centre location and an impact assessment on existing shopping centres would not be required by policy. There is an existing officer on site and a reprovision and enhancement of this is considered appropriate for a transport hub. It is considered that this would be complementary to, rather than detrimental to, existing shopping areas nearby, particularly given the Site Allocation recognition that the site acts as a gateway to the Richmond area.</p> <p>See response to comment 594 with regards the appropriateness of a tall building zone.</p> <p>Support for a revised development brief for the site is noted.</p>	
-	Peter Willan and Paul Velluet, Old Deer Park Working Group		[See comment 1035 in respect of Policy 45 and high rise development which refer to Richmond Station]	See response to comment 594 with regards the appropriateness of a tall building zone.

597	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	Site Allocation 25. Former House of Fraser, 16, Paved Court, 20, King Street, 4 to 8 and 10, Paved Court and 75-81, George Street, Richmond	<p>The draft text needs to be amended to include specific reference to the need for any development of the site to provide for the enhancement of the external elevations of the existing 1960s building and the complete removal of the existing plant-enclosures at roof level in order to enhance views of the building from The Green and Hill Street, particularly in relation to the setting of the grade II* listed properties in Old Palace Terrace on Richmond Green, and that any extension or extensions to the existing building should rise no higher than the existing building (i.e. above four storeys), or that any replacement development of the site should rise no higher than that of the existing building .</p> <p>Supporting document/evidence: Urban Design Study December 2021. Character Area F1 Central Richmond and Richmond Green Conservation Area Statements</p>	<p>The former House of Fraser building itself is not a heritage asset, though the Site Allocation makes clear that any development proposal must be of the highest quality in character, respond positively to the Conservation Areas and protect and where possible enhance on-site Listed Buildings and BTMs, as well as nearby heritage assets. Thus any future planning application would to have regard to heights, elevational design and roof treatments as part of the demonstration of compliance with the above. To list these specific requirements is considered to be too prescriptive for the purposes of a Site Allocation, whose existing wording would already allow for assessment of these matters. Thus no changes to the wording are recommended.</p>
600	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	Site Allocation 26 - Richmond Telephone Exchange, Spring Terrace, Richmond	<p>The draft text needs to be amended to include specific reference to the need for any extension or extensions to the existing building should rise no higher than the three-storey part of the existing building, or that any replacement development of the site should rise no higher than that of the three-storey part of the existing building.</p> <p>Supporting document/evidence: Urban Design Study December 2021. Character Area F1 Sheen Road Conservation Area Statement</p>	<p>See response to comment 599 with regards to heights.</p>
603	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	Site Allocation 27. The American University, Queen's Road, Richmond	<p>The draft text needs to be amended to include specific reference to the need for any extension or extensions to the existing buildings on the site should rise no higher than any of the existing buildings on the site, or that any replacement or additional buildings on the site should rise no higher than any of the existing buildings on the site.</p> <p>Supporting document/evidence: Urban Design Study December 2021. Character Area F2 Richmond Hill Conservation Area Statement</p>	<p>The Site Allocation makes clear that any development proposal must protect and where possible enhance the heritage assets on site and the Conservation, as well as nearby heritage assets, having regard to the design objectives and general guidance relating to the local character of the area set out in the relevant character area profiles and design guidance set out in the Urban Design Study and Village Planning Guidance. It is not considered reasonable to be prescriptive regarding heights for its own sake; rather it is the Council's intention to ensure that heritage assets are protected and where possible enhanced, and that development reflects the character of the area. Heights would therefore be considered as part of that assessment and it is not considered necessary to specifically reference a restriction in the Site Allocation. The wording of the Site Allocation is therefore considered to be appropriate and no amendments are recommended.</p>

609	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	Site Allocation 28 - Homebase, Manor Road, North Sheen	<p>(N.b. Not East Sheen)</p> <p>Given the fundamentally flawed analysis and recommendations contained in the relevant parts of Arup's Urban Design Study to which repeated references are made in the draft Local Plan, the draft text of this Site Allocation needs to be amended by the deletion of the statement: 'The Urban Design Study 2021 identifies part of the site as a tall building zone (7-8 storeys), with a mid-rise zone buffer (5-6 storeys), in accordance with Policy 45 Tall and Mid-Rise Building Zones', and the statement '...however the Urban Design Study 2021 recommends the appropriate heights for the zone are up to 8 storeys to respect the small scale of the surrounding area'. The draft text needs to be further amended to include specific reference to the need for any new development across the site to rise no higher than four storeys in order to relate the predominantly two-storey scale of the nearby residential areas to the north, north-west, west, south-west, south and east of the site, and to the similarly scaled properties within the nearby Sheendale Road and Sheen Road Conservation Areas'.</p> <p>Supporting document/evidence: Urban Design Study December 2021. Character Area F3</p>	<p>See response to comment 594 regarding the methodology underpinning the Urban Design Study.</p> <p>Part of the site is identified within the UDS as having capacity for buildings of 7-8 storeys, illustrated on the heat maps on p.256 and p.328. The heat maps show the tallest buildings located in the centre of the site and reducing in height, reflected in the mid-rise zone which provides a transition to the smaller scale of the surrounding area.</p> <p>Additional wording to make specific reference within Appendix A to 2-storey prevailing heights to the N, NW, W, SW and SE and more specific separate references to the Homebase site versus the Sainsburys site has been amended in the updated Urban Design Study. However, no changes to the Site Allocation itself are recommended.</p>
616	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	Site Allocation 29 - Sainsbury's, Lower Richmond Road and Manor Road, North Sheen	<p>Site Allocation 29 - Sainsbury's, Lower Richmond Road <u>and Manor Road</u>, North Sheen</p> <p>Given the fundamentally flawed analysis and recommendations contained in the relevant parts of Arup's Urban Design Study to which repeated references are made in the draft Local Plan, the draft text needs to be amended by the deletion of the sentence: 'The Urban Design Study 2021 identifies part of the site as a tall building zone (7-8 storeys), with a mid-rise zone buffer (5-6 storeys), in accordance with Policy 45 Tall and Mid-Rise Building Zones'.</p> <p>Supporting document/evidence: Urban Design Study December 2021. Charcater Area F3</p>	<p>See response to comment 594 regarding the methodology underpinning the Urban Design Study. The site is assessed as having capacity for buildings up to 7-8 storeys in part of the site, stepping down around the edges of the site to a mid-rise zone with maximum 5-6 storeys. No amendments to the Site Allocation are required.</p>

<p>618</p>	<p>Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)</p>	<p>Place-based Strategy for Kew</p>	<p>Based on Section 3 – Character Areas in Arup’s 432-page Urban Design Study, The Old Deer Park is incorrectly grouped with the Royal Botanic Gardens, Kew in Character Area ‘G1 – Kew Gardens and Riverside’ under the overall heading ‘G –Kew’). Like Richmond Park, the Old Deer Park should be covered by its own Character Area as ‘F4 – The Old Deer Park’, under the overall heading of ‘F – Richmond & Richmond Hill (sic)’. On this basis, other sections of Arup’s Urban Design Study and to the Draft Local Plan need to be adjusted accordingly. Indeed, more fundamentally, the proposed structure of ‘Character Areas’ relating to Richmond, Kew and North Sheen as set out in Section 3 et seq. in Arup’s Urban Design Study needs to be challenged. The proposed boundaries relate neither to the present Ward boundaries nor to the existing conservation area boundaries. They should surely be based for the most part on the present conservation areas.</p>	<p>The Old Deer Park is grouped into the character area G1 ‘Kew Gardens and Riverside’ because it is similar in character to the open spaces along this stretch of the Thames with regards to its green space, openness and its location next to the river. It is also part of the Kew Registered Park and Garden. The character areas and boundaries for the Urban Design Study (UDS) 2021 were subject to public consultation in May to June 2021. The method for defining the boundaries is set out in the methodology of the UDS pp.351- 353. This explains that, alongside field work, the following sources of information was used to define the boundaries included: -the Village Planning Guidance SPDs -Ward boundaries -existing town centres and areas of regeneration -conservation areas. Wherever possible, the UDS has followed conservation area boundaries and in particular, aimed not to split conservation areas. In some cases, conservation areas have been grouped because they are at too fine a grain for the scope of the study. The existing boundaries of the Village Planning Guidance were also used wherever possible, though areas were combined to achieve a more usable scale for the scope and purposes of this borough-wide study. The Old Deer Park is written about separately in the character area profile on p.170 and it is not considered that it warrants a separate character area profile. With regards to the other boundaries within the Richmond, North Sheen and Kew place, a detailed description of how these have been defined is provided below.</p> <p>Richmond Town Centre and Riverside: The boundary aims to incorporate the town centre character and uses and the Richmond part of the Riverside. Southern edge follows Village Planning SPD Area 13 along the river to Twickenham Bridge where it then follows the bridge as a logical feature and perceptual ‘end’ of Richmond town, before following the Village Planning SPD Area 13 and 14 and Conservation Area boundary with Old Deer Park. To the north west it follows Village Planning</p>
------------	--	-------------------------------------	---	---

619	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	Place-based Strategy for Kew (in relation to Old Deer Park)	We recommend that the Old Deer Park should be covered by its own Character Area but the park's access from Richmond Town and proximity encourage the consultation response from the Old Deer Park Working Group on the Old Deer Park to be considered alongside this response from the Prospect of Richmond on Richmond Town.	See response to Comment 618 regarding the character area boundaries and Old Deer Park. Comments noted.
-----	---	---	---	---

620

Peter Willan and Paul Velluet, Old Deer Park Working Group

Place-based Strategy for Kew (in relation to Old Deer Park)

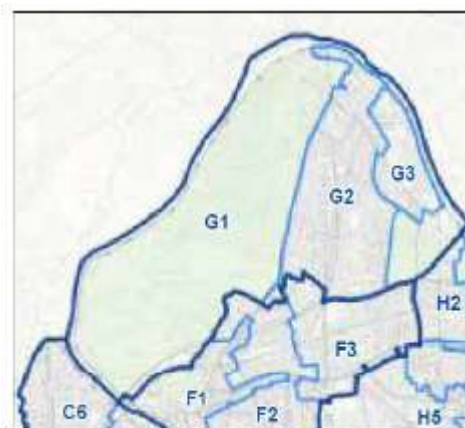
Place Definitions. Based on Section 3 – Character Areas in Arup’s 432-page Urban Design Study, The Old Deer Park is incorrectly grouped with the Royal Botanic Gardens, Kew in Character Area ‘G1 – Kew Gardens and Riverside’ under the overall heading ‘G –Kew’. Like Richmond Park, the Old Deer Park should be covered by its own Character Area as ‘F4 – The Old Deer Park’, under the overall heading of ‘F – Richmond & Richmond Hill (sic)’. On this basis, other sections of Arup’s Urban Design Study and to the Draft Local Plan need to be adjusted accordingly.

Indeed, more fundamentally, the proposed structure of ‘Character Areas’ as set out in Section 3 et seq. in Arup’s Urban Design Study needs to be challenged. The proposed boundaries relate neither to the present Ward boundaries nor to the existing conservation area boundaries. They should surely be based for the most part on the present conservation areas and in this case the Old Deer Park Conservation Area.

Confusingly, the extant ‘Richmond & Richmond Hill Village Plan’ (2016) comprises all four areas plus Richmond and Richmond Hill residential (F2), North Sheen Residential (F3) and the Old Deer Park which is included in the Local Plan as Placed Based Strategy for Kew and has its own Old Deer Park Conservation Area Statement and SPD.

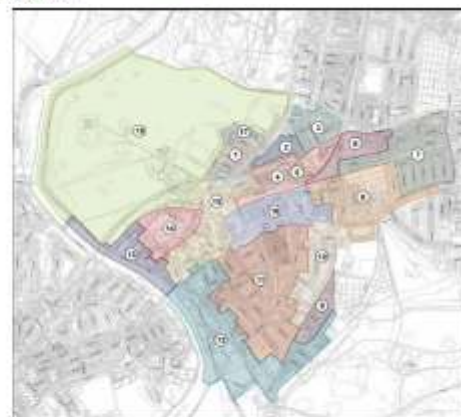
We have extracted the Character Area Map from Arup’s Urban Design Study Dec 2021 and provided a Conservation Area Map so that members of the community reading our response can better understand the context.

See response to Comment 618 regarding the character area boundaries.



Kew Character Areas (G1 ODP), Urban Design Study Dec 2021

- Conservation Area 1: Kew Foot Road
- Character Area 2: The Poplar Triangle
- Character Area 3: North of Lower Mortlake Road
- Character Area 4: South of Lower Mortlake Road
- Conservation Area 5: Sheen Hill Road
- Character Area 6: Old Gun Works
- Character Area 7: Between Lower and Upper Richmond Road
- Character Area 8: King's Farm Avenue and surrounds
- Character Area 9: Queen's Road Estate
- Character Area 10: Queen's Road (over ridge)
- Conservation Area 11: St Matthias
- Conservation Area 12: Richmond Hill
- Conservation Area 13: Richmond Riverside
- Conservation Area 14: Richmond Green
- Conservation Area 15: Central Richmond
- Conservation Area 16: Sheen Road
- Character Area 17: Old Deer Park Garden
- Conservation Area 18: Old Deer Park



Conservation Areas Richmond & Richmond Hill Village Plan

634	Peter Willan and Paul Velluet, Old Deer Park Working Group	Site Allocation 32: Pools on the Park and surroundings, Old Deer Park, Richmond	<p>The fourth bullet-point in the draft text needs to be amended to refer to the fact that at present the Statement of Significance is only in an incomplete draft form and needs to be amended before formal adoption in order to take full account of the particular special interest and significance of the listed pools complex and its landscaped setting. (In this connection, the Old Deer Park Working Group has been pressing the Council to undertake such amendment repeatedly since March, 2018. The text also needs to take account of the repeated requests by the local community over the last forty years for the Pools complex and its surrounding landscaped setting to be designated as Metropolitan Open Land, like the parkland which surrounds them).</p> <p>Supporting document/evidence: Urban Design Study December 2021 (Character Area G1) Old Deer Park Conservation Area Statement Old Deer Park: The Crown Estate Landscape Strategy 1999 Old Deer Park Supplementary Planning Document 2018 Draft Statement of Significance Old Deer Park: The Crown Estate Landscape Strategy 1999 Old Deer Park Supplementary Planning Document 2018</p>	<p>It has been clarified on the Council's website in May 2022 that the Statement of Significance: Richmond Public Baths, Old Deer Park, Richmond September 2017 a draft version. It remains appropriate that the Site Allocation refers to this document. The special interest and significance of the site and its surroundings is well recorded in other documents too, including the Old Deer Park SPD February 2018, CA57 Old Deer Park Conservation Area appraisal, and Richmond and Richmond Hill Village Planning Guidance June 217. These are all identified in the Site Allocation. The text also makes specific reference to the importance that any development proposal is considered within the context of the designations of the site and surrounding area. It is therefore considered that the current wording of the text is sufficient.</p> <p>Pools on the Park is a developed parcel of land which also includes a sizable amount of hardstanding. It is not considered that the site would score sufficiently highly against the 4 criteria used as part of the Open Land Review 2021 intended to inform the new Local Plan and consequently there are no plans by the Council to extend the surrounding MOL designation to include the site.</p>
638	Peter Willan and Paul Velluet, Old Deer Park Working Group	Site Allocation 33: Richmond Athletic Association Ground, Old Deer Park, Richmond	<p>No change proposed.</p> <p>Supporting document/evidence: Urban Design Study December 2021 (Character Area G1) Old Deer Park Conservation Area Statement Old Deer Park: The Crown Estate Landscape Strategy 1999 Old Deer Park Supplementary Planning Document 2018</p>	Noted.
673	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	General - Policies	Section 15 in the un-headed list of contents – titled 'Policies' - doesn't contain anything other than one photograph. Instead, the polices are set out in Sections 4 and 16 to 26 inclusive. Needs remedying.	-
674	Peter Willan and Paul Velluet, Old Deer Park Working Group	General - Policies	Section 15 in the un-headed list of contents – titled 'Policies' - doesn't contain anything other than one photograph. Instead, the polices are set out in Sections 4 and 16 to 26 inclusive. Needs remedying.	-

Off

678	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	Climate Change Emergency.	We welcome the increased emphasis given to climate change and pollution.	Support noted.
679	Peter Willan and Paul Velluet, Old Deer Park Working Group	Climate Change Emergency.	We welcome the increased emphasis given to climate change and pollution.	Support noted.
794	Peter Willan and Paul Velluet, Old Deer Park Working Group	General comment (in relation to culture)	We support the attention given to the Cultural Policies and would like to see Richmond town centre play a significant role in the Council's Culture Richmond 2021-2031 Plan.	Noted.
795	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	General comment (in relation to culture)	We support the attention given to the Cultural Policies and would like to see Richmond town centre play a significant role in the Council's Culture Richmond 2021-2031 Plan.	Noted.

805

Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)

Policy 18. Development in centres

We refer to Arup's Urban Design Study, December 2016; Lichfields Richmond-upon-Thames Retail and Leisure Needs Study Phase 1 Update, July 2021; Icen's Richmond Local Housing Market Assessment, December 2021; and Santec's Employment Land and Premises Needs Assessment, December 2021- all provided as supplementary evidence by the Council.

We have sought to pull together the estimated demand and availability of floor space for all uses in Richmond Town from 2021 to 2039.

Richmond Zone 1 Retail, Non-retail services and Leisure Floor space

Lichfields' Report estimates population as shown in Figure 1 and retail, non-retail services and leisure over/under supply in Figure 2. Richmond borough is divided by Lichfields into 7 zones: Richmond, Twickenham, Whitton, Teddington, Hampton, Kew/North Richmond, Barnes/E Sheen. The focus here is on Zone 1 for which a map is shown in Figure 3. The population for the borough is estimated to rise by only 2.9% from 2021 to 2039 and to decline slightly in Richmond Zone 1. The over/under supply of space is calculated by estimating the expenditure per person and then the total available expenditure based on the population. Expenditure from existing facilities is estimated and subtracted from the available expenditure to establish the incremental expenditure from new facilities. This increment is then converted into net floor space by turnover density factors and finally into gross floor space over/under supply. We question why Table 11 page 74 of the Lichfields' Report is headed Gross floor space - a step of first calculating Net floor space seems to be missing.

It is estimated that in 2039 there will be an under supply of retail and non-retail services floor pace of 1,457 m2 and an over supply in preceding years. There is an estimated under supply of 7,000 m2 for leisure in 2039 and 4,000 m2 in 2034 but no information for earlier years. Non-retail services include hairdressers, banks, restaurants, cafes and hot food takeaways. Leisure includes cinemas and cultural activities. Home/internet turnover is taken into account.

	Table 1				
	Population				
	2021	2024	2029	2034	2039
Population Richmond Zone 1 see map attached	23,031	22,440	22,056	22,170	22,536
Population Richmond Borough	199,603	198,220	200,146	201,548	205,200

Figure 1 Source Lichfields report on Retail and Leisure

	Table 3.1a					
	Total 2017	Over(-)/under(+) Supply Cumulative Gross Floorspace				
	2021	2024	2029	2034	2039	
	m2	m2	m2	m2	m2	m2
Retail Convenience	7,950	-246	-163	55	388	
Retail Comparison	31,727	-1,594	-2,075	-1,895	-1,342	
Food/beverage	4,640	-3,266	-217	891	2,411	
Non-retail Services						
Total	44,317	-5,106	-2,455	-949	1,457	
Leisure				4,000	7,000	

Figure 2. Source Lichfields report on Retail and Leisure

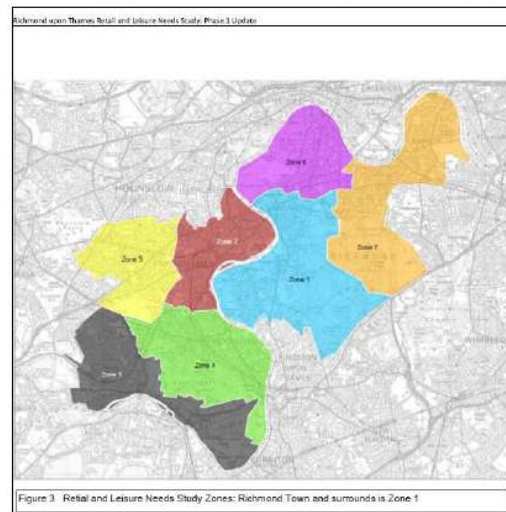


Figure 3 Retail and Leisure Needs Study Zones: Richmond Town and surrounds is Zone 1

				<p>The Evidence Base seeks to forecast the need for land uses to ensure that needs are met as required by the NPPF. The research has been produced separately, reflecting industry-standard approaches, but in a co-ordinated way, with liaison between consultants.</p> <p>The Council's Town Centre Land Use Survey records ground floor occupiers of premises in the borough's centres, covering approximately 2,500 premises. Despite the pandemic, data have continued to be collected and analysed with surveys taking place in 2019, 2020, 2021 and 2022.</p> <p>The RLNS has been purposefully split into two phases to allow for the more detailed assessment, including the qualitative element, to be produced in 2022 when it was expected that the impact of the pandemic would have lessened from the previous year, in order to produce as accurate an assessment as possible, bearing in mind timetabling commitments for the Local Plan.</p> <p>This approach, coupled with the updating of key elements of the evidence base including the Employment Land and Premises Needs Assessment and the Urban Design Study provide an up-to-date basis which supports the Regulation 19 Local Plan.</p>
807	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	General comment in relation to planning uses	We welcome the recognition of the implications, including the risks, of the new combined business land Use Class E and changes to permitted development rights. We comment later on this topic and the potential consequences for balancing the uses of Richmond Town and its character.	Noted.

812	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	General comment in relation to Evening and Night Time Economy.	<p>We note support throughout the Local Plan to Richmond town centre Night Time economy and in some cases extending to the Riverside and Richmond Green. We welcome the caveat in the Local Plan as stated in Policy 19, Managing Impacts and elsewhere, that there is a combined and cumulative impact that needs to be controlled and that amenity of residents needs to be protected. It may be semantics but we recommend a greater distinction between the evening and night time economies with the later applying to the late evening early hours of the morning. We are opposed to supporting a Night time economy in Richmond Town and on and around Richmond Green due to resident harm and the Riverside due to resident harm including those on the Twickenham riverside.</p> <p>Richmond town and surrounding areas have one of the highest ratios of pubs and bars to residents in the whole of London and moreover confined to a small area by the Thames and railway line. Public transport is reduced by midnight and is very limited shortly thereafter. Police and cleansing resources are not available at night time. We support the evening economy, and increasing family use, but the town needs to wind down before midnight so residents can get their eight hours sleep as advised by the WHO, difficult as this is with Heathrow night flights starting at 4:30am.</p> <p>We note Policy 19 does enable the Council to limit closing hours of premises. But we urge the Local Plan to go further. Night time economy infers activity past 11pm into the early hours of the morning and we would urge the Local Plan to explicitly discourage this in Richmond Town, but of course recognising there may be exceptions. Disturbance of residents arises to those living in the heart of the town as well as on and around Richmond Green and along the Riverside which also includes resident disturbance on the Twickenham riverside. We urge better distinction between the evening and night economies.</p>	<p>Richmond town centre is recognised in the London Plan as having a classification NT 2 – an area of regional/sub-regional importance in terms of the night-time economy.</p> <p>It is considered that the policies proposed, particularly Policy 19, are sufficiently robust to ensure that impact on residential amenity is taken fully into account. The preferred approach is to consider each proposal on its merits and include consideration of cumulative impact and whether the proposal would result in the over-concentration of similar uses contrary to policies 18 & 19.</p> <p>The Council's Licensing policy may also be taken into account, including the Cumulative Impact Policy applying to large parts of the centre. Hours of operation can be restricted where reasonable and appropriate under both licensing and planning regimes.</p>
865	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	Policy 28. Local character and design quality (Strategic Policy)	<p>The wording of Part A of the Policy needs to be amended to refer to the Borough's conservation areas as well as to the 'character areas' and 'places' identified in the Borough-wide characterisation work undertaken as part of Arup's Urban Design Study given the statutory protection enjoyed by such designated heritage assets under the provisions of the Planning (Listed Buildings and Conservation Areas) Act, 1990, and the National Planning Policy Framework .</p> <p>The wording needs to be further amended to define 'the places' identified in Arup's Urban Design Study, and the purpose of such a designation.</p>	<p>The purpose of Policy 28 is to encompass all development within the Borough, with special attention paid to the 'places' and 'character areas' identified in the Urban Design Study. Conservation Areas are included in this umbrella policy/by default but have more specific expectations outside of the scope of this policy, which are outlined in Policy 29 – Designated Heritage Assets.</p> <p>The purpose of the Urban Design Study is outlined in detail in Policy 2 (Spatial Strategy: Managing change in the borough) and in sections 5 and 6 of the Local Plan.</p> <p>See also response to comment 586.</p>

Off

866	Peter Willan and Paul Velluet, Old Deer Park Working Group	Policy 28. Local character and design quality (Strategic Policy)	The wording of Part A of the Policy needs to be amended to refer to the Borough's conservation areas as well as to the 'character areas' and 'places' identified in the Borough-wide characterisation work undertaken as part of Arup's Urban Design Study given the statutory protection enjoyed by such designated heritage assets under the provisions of the Planning (Listed Buildings and Conservation Areas) Act, 1990, and the National Planning Policy Framework . The wording needs to be further amended to define 'the places' identified in Arup's Urban Design Study, and the purpose of such a designation.	See response to comment 865.
878	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	Policy 29. Designated heritage assets	No change proposed.	Comment noted.
879	Peter Willan and Paul Velluet, Old Deer Park Working Group	Policy 29. Designated heritage assets	No change proposed.	Comment noted.
885	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	Policy 30. Non-designated heritage assets	No change proposed.	Comment noted.
886	Peter Willan and Paul Velluet, Old Deer Park Working Group	Policy 30. Non-designated heritage assets	No change proposed.	Comment noted.
927	Peter Willan and Paul Velluet, Old Deer Park Working Group	MOL Review – naming of Parcel 28 and Parcel 31	The Arup MOL Review Annex Report; a Parcel 28 page 92 is titled Little Green. It should be Richmond Green, b Parcel 31 page 101 is titled Thames Old Deer Park. It is not part of the Old Deer Park.	The Open Land Review has been updated in 2023 to incorporate these suggestions for the site assessments.

929	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	Policy 35 – Green Belt, Metropolitan Open Land and Local Green Space	<p>We respond here on MOL status for Richmond Green, Policy 35, which is significantly undervalued by Arup's MOL Review Annex Report, and on Riverside North of Richmond Bridge and Riverside South of Richmond Bridge.</p> <p>Under the heading 'Proposed changes to the Policies Map' the landscaped open-space setting of the listed Pools-on-the-Park complex in the Old Deer Park Working needs to be annotated as Metropolitan Open Land in the Policies Map as repeatedly urged by the local community over the last forty years in order to reflect its significant functional and landscape roles and in order to relate to the designation of the surrounding parkland as Metropolitan Open Land. In this connection, it is noted that neither Section 2 nor Section 15 of the draft Local Plan appears to include any reference to a Policies Map. Referring to the note contained under 'Policies Map for the Local Plan Review, 2015-2018' in the part of the Council's current Planning Policy web-site dealing with the current 'Adopted Local Plan' (adopted in July, 2018), it is clearly stated that 'The Council's Policies Map (formerly called the Proposals Map) will be updated in 2020 to reflect the Local Plan adopted in July, 2018 and March, 2020'. However, to date, this has never been done. There is no published Policies (formerly Proposals) Map beyond that published in July 2015. Prospect of Richmond has picked-up this omission in previous submissions. The omission needs to be urgently remedied.</p> <p>(In Arup's 156-page Metropolitan Open Land Review - Annex Report, the Old Deer Park South of A316 'Parcel' (sic) – no. 26 has been severed, wholly unjustifiably, from the remainder of the Old Deer Park covered in the Old Deer Park and Kew Gardens 'Parcel' – no. 24 and that part of the Park contained in the Old Palace Lane Richmond Riverside 'Parcel' – no. 29), despite its forming an integral part of the Old Deer Park as a specifically registered historic park and a specifically designated conservation area, and its designation with those parts of the Park on the north-western side of the Twickenham Road and the south-eastern side of the railway viaduct as Metropolitan Open Land and Public Open Space. Importantly, this part of the Park is the most readily and easily accessible part of the public Park from the remainder of the Town and the Riverside on foot given its proximity to the heart of the Town and public transport and car-parking provision. Such a severance in the Metropolitan Open Land Review reflects a fundamentally flawed analysis of the area. Similarly and equally open to serious question is the finding that 'the eastern third of the parcel, is developed and does not meet the MOL criteria' and that its MOL status should be considered further. The parcel is certainly NOT 'largely inaccessible to people' as claimed in the assessment; not least, because it provides an integral part of a direct pedestrian link between Richmond Station, Parkshot, Park Lane, the Old Deer Park Car-park, Richmond Green and the riverside at its south-western end.</p> <p>In relation to the The Green and Little Green, Richmond 'Parcel' – no. 28, the assessment that these two, vastly important, inter-related public open spaces are only assessed as only 3, 2, 3, 3 and 3 in the criteria summary, rather than as 5, 5, 5, 5 and 5, clearly reflects a fundamentally flawed analysis of the area and failure to recognise its accessibility to the riverside and the heart of the Town. Described by Bridget Cherry and the late Nikolaus Pevsner in relevant volume of The Buildings of England – London 2: South as 'one of the most beautiful urban greens surviving anywhere in England', Richmond Green possesses not only considerable architectural, historic and landscape interest and significance, but importantly, constitutes a</p>	<p>The Council, through the Arup Open Land Review (2021) only assessed existing MOL based on mapping from 2015. It is not the Council's intention to identify new parcels of land for MOL for the new Local Plan.</p> <p>Arup, in their Open Land Review 2021, separated parcel 26 from parcel 24 using accepted methodology for undertaking MOL reviews in line with national Green Belt policy, which states boundaries are to be defined 'using physical features that are readily recognisable and likely to be permanent' (paragraph 143, NPPF), in this case the A316. This eastern part of the parcel is still designated as a Registered Park and Garden, however due to a lack of 'openness' it is considered that it cannot be recommended to meet MOL purposes on this feature alone. The Council do not propose to change the MOL designation of this site in line with the Reg 18 plan.</p> <p>For criterion 4, the assessment considers whether the parcel forms part of a strategic corridor, node or link in the network of green infrastructure. A large amount of the parcel is unfenced lawn, which could be used by people, but as it has no formal access routes (apart from a small section of the Thames Path), it was considered to provide limited access links for people. Whilst the eastern third of the parcel is publicly accessible, due to its developed nature (a public car park), it was not considered to contribute to the green infrastructure network. The parcels contribution to the River Thames path was considered, scoring moderate (3) overall, despite most of the parcel scoring more weakly.</p>
-----	---	--	---	---

930	Peter Willan and Paul Velluet, Old Deer Park Working Group	Policy 35. Green Belt, Metropolitan Open Land and Local Green Space	<p>We respond here on MOL status and boundary anomalies and seek to remove any question of an important part of the Old Deer Park ceasing to being designated as MOL, as raised in Arup's MOL Review Annex Report. We comment further on Policy 35 Green Belt, Metropolitan Open Land and Local Green Space.</p> <p>Under the heading 'Proposed changes to the Policies Map' the landscaped open-space setting of the listed Pools-on-the-Park complex in the Old Deer Park Working needs to be annotated as Metropolitan Open Land in the Policies Map as repeatedly urged by the local community over the last forty years in order to reflect its significant functional and landscape roles and in order to relate to the designation of the surrounding parkland as Metropolitan Open Land. In this connection, it is noted that neither Section 2 nor Section 15 of the draft Local Plan appears to include any reference to a Policies Map. Referring to the note contained under 'Policies Map for the Local Plan Review, 2015-2018' in the part of the Council's current Planning Policy web-site dealing with the current 'Adopted Local Plan' (adopted in July, 2018), it is clearly stated that 'The Council's Policies Map (formerly called the Proposals Map) will be updated in 2020 to reflect the Local Plan adopted in July, 2018 and March, 2020'. However, to date, this has never been done. There is no published Policies (formerly Proposals) Map beyond that published in July 2015. Prospect of Richmond has picked-up this omission in previous submissions. The omission needs to be urgently remedied.</p> <p>(In Arup's 156-page Metropolitan Open Land Review - Annex Report, the Old Deer Park South of A316 'Parcel' (sic) – no. 26 has been severed, wholly unjustifiably, from the remainder of the Old Deer Park covered in the Old Deer Park and Kew Gardens 'Parcel' – no. 24 and that part of the Park contained in the Old Palace Lane Richmond Riverside 'Parcel' – no. 29), despite its forming an integral part of the Old Deer Park as a specifically registered historic park and a specifically designated conservation area, and its designation with those parts of the Park on the north-western side of the Twickenham Road and the south-eastern side of the railway viaduct as Metropolitan Open Land and Public Open Space. Importantly, this part of the Park is the most readily and easily accessible part of the public Park from the remainder of the Town and the Riverside on foot given its proximity to the heart of the Town and public transport and car-parking provision. Such a severance in the Metropolitan Open Land Review reflects a fundamentally flawed analysis of the area. Similarly and equally open to serious question is the finding that 'the eastern third of the parcel, is developed and does not meet the MOL criteria' and that its MOL status should be considered further. The parcel is certainly NOT 'largely inaccessible to people' as claimed in the assessment; not least, because it provides an integral part of a direct pedestrian link between Richmond Station, Parkshot, Park Lane, the Old Deer Park Car-park, Richmond Green and the riverside at its south-western end.</p> <p>In relation to the The Green and Little Green, Richmond 'Parcel' – no. 28, the assessment that these two, vastly important, inter-related public open spaces are only assessed as only 3, 2, 3, 3 and 3 in the criteria summary, rather than as 5, 5, 5, 5 and 5, clearly reflects a fundamentally flawed analysis of the area and failure to recognise its accessibility to the riverside and the heart of the Town. Described by Bridget Cherry and the late Nikolaus Pevsner in relevant volume of The Buildings of England – London 2: South as 'one of</p>	<ul style="list-style-type: none"> • The Council, through the Arup Open Land Review (2021) only assessed existing MOL based on mapping from 2015. It is not the Council's intention to identify new parcels of land for MOL for the new Local Plan. • Arup, in their Open Land Review 2021, separated parcel 26 from parcel 24 using accepted methodology for undertaking MOL reviews in line with national Green Belt policy, which states boundaries are to be defined 'using physical features that are readily recognisable and likely to be permanent' (paragraph 143, NPPF), in this case the A316. This eastern part of the parcel is still designated as a Registered Park and Garden, however due to a lack of 'openness' it is considered that it cannot be recommended to meet MOL purposes on this feature alone. The Council do not propose to change the MOL designation of this site in line with the Reg 18 plan. • For criterion 4, the assessment considers whether the parcel forms part of a strategic corridor, node or link in the network of green infrastructure. A large amount of the parcel is unfenced lawn, which could be used by people, but as it has no formal access routes (apart from a small section of the Thames Path), it was considered to provide limited access links for people. Whilst the eastern third of the parcel is publicly accessible, due to its developed nature (a public car park), it was not considered to contribute to the green infrastructure network. The parcel's contribution to the River Thames path was considered, scoring moderate (3) overall, despite most of the parcel scoring more weakly. • The Council have amended criterion 4 to reflect the points set out above.
-----	--	---	---	--

952	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	Policy 37. Public open space, play, sport and recreation	No change proposed.	Noted.
954	Peter Willan and Paul Velluet, Old Deer Park Working Group	General comment (in relation to culture)	We understand the Council expect to undertake a further Sports Review in 2022.	The Council has developed an update to the Richmond Playing Pitch Strategy.
955	Peter Willan and Paul Velluet, Old Deer Park Working Group	Policy 37. Public open space, play, sport and recreation	No change proposed.	Noted.
1013	Peter Willan and Paul Velluet, Old Deer Park Working Group	Policy 43. Floodlighting and other external artificial lighting	No change proposed.	Noted.
1014	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	Policy 43. Floodlighting and other external artificial lighting	No change proposed.	Noted.
1018	Peter Willan and Paul Velluet, Old Deer Park Working Group	Policy 44. Design Process	The wording of Part B of the Policy needs to be amended to omit reference to 'the design guidance for the relevant character area as specified within the Urban Design Study 2021' insofar as it refers to Tall and Mid-rise Building Zones in Figure 383 (on page 254) and in 'F. Richmond and Richmond Hill' (on page 255).	All development would be expected to have regard to the relevant character area set out in the Urban Design Study 2021, including proposals in Tall and Mid-Rise Building Zones and those within the Richmond and Richmond Hill character area. It is not considered that any changes to the wording are therefore considered to be necessary.
1019	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	Policy 44. Design Process	The wording of Part B of the Policy needs to be amended to omit reference to 'the design guidance for the relevant character area as specified within the Urban Design Study 2021' insofar as it refers to Tall and Mid-rise Building Zones in Figure 383 (on page 254) and in 'F. Richmond and Richmond Hill' (on page 255).	See response to Comment no. 1018.

1032	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	Policy 45.Tall and Mid-Rise Building Zones	<p>The wording of the Policy 45 needs to be substantially amended to omit any reference to the acceptability of development above five storeys (15 m.) in height anywhere in Character Areas F1, F2, F3 and G1 – whether defined as a 'Tall' or 'Mid-rise' buildings Accordingly, diagrams 27.21 and 27.22 – Richmond Station: Tall Building Zone and Mid-Rise Zone, and diagrams 27.24 and 27.25 – North Sheen (Lower Richmond Road and Homebase Sites): Tall Building Zone and Mid-rise Zone, in Appendix 3: Tall and Mid-rise Building Zones, need to be omitted or substantially amended, and the Policies Map adjusted accordingly. Such a policy would properly reflect the very maximum height of existing development across Character Areas F1, F2, F3 and G1 and in most other areas within the Borough. The highly contentious proposed policy of acceptance of 'Tall buildings and Mid-rise Zones development rising above five storeys (15 m.) would appear to be drawn from the design guidance contained in Sections 4.6, 5.2 and 5.5 and Appendix A of Arup's Urban Design Study, parts of which reflect a fundamentally flawed analysis and appreciation of the area, including parts of Sections A.3* and B.6, Figure 383 – Richmond and Richmond Hill Tall and Mid-rise Buildings Zone map (on page 254) and the diagrams under the heading 'F. Richmond and Richmond Hill' relating to the Richmond Station, the Homebase and Lower Richmond Road Sites (on page 255). * In particular the text and diagrams for the Richmond Station, Lower Richmond Road and North Sheen (Homebase) Sites contained under Tall Building Zone Place F for Richmond and Richmond Hill on pages 324 to 327.</p> <p>Finally, the highly questionable claim made in paragraph 22.12 of the supporting text for Policy 45 to the effect that 'Tall buildings can make a crucial, positive contribution to good design as well as providing densities supporting scheme viability, maximising the delivery of affordable housing and optimising the use of land' has no relevance at all to the existing urban character of Richmond, its sustainable development, its enhancement or the provision of 'affordable housing' for Londoners – let alone the delivery social housing. In this connection, it is significant that some of the highest density of housing in the Richmond area and other areas of London developed over the last one hundred and thirty years has been secured in developments rising to no greater than four or five storeys in height.</p>	<p>See response to comment 1030 with regards the methodology underpinning the Urban Design Study, which is considered to be robust and sound.</p> <p><u>Richmond Station</u></p> <ul style="list-style-type: none"> -The Urban Design Study 2021 has identified the site as having capacity to accommodate buildings of up to 7-8 storeys. The text on p.255 highlights that the opportunities for the tallest heights are within parts of the zone, and that buildings should step down to the surroundings, as indicated by the heat map and surrounding mid-rise zone. -The character profile on p.158 notes that there is an underwhelming sense of arrival at the station. -The design guidance on p.297 states that main roads may be able to accommodate taller buildings if stepped back. It also recommends the sense of arrival and quality of the public realm at the station could be enhanced. -The strategy for the area is to conserve and enhance the identity of specific areas (notably around the station) and the functioning of the area as a town centre. -The assessment in Appendix A on p.325 provides a rationale for the appropriate heights identified. A scenario was tested on the site, which was developed in the context of providing active ground floor uses, respecting the height of the existing locally listed station building, setting the taller element back behind the primary frontage and noting there is potential for a new development to serve as a landmark gateway marking the arrival point in Richmond. <p>The existing commercial building to the south of the station is 5 storeys (and 6 storeys to the east where the ground level drops).</p> <ul style="list-style-type: none"> -A ZTV was produced to test the potential visibility of the scenario heights and a high level townscape, visual and heritage assessment was undertaken. The assessment concludes that there <i>'is potential for some additional height, but only where this is substantially set back within the plot and away from the road frontage'</i>. -The assessment notes the tall building zone is limited by the many sensitivities including the locally listed station
------	---	--	--	--

1033	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	General comment (in relation to high rise development)	We are deeply concerned at the support given for high rise development at the Richmond Station and comment on Site Allocation 24 Richmond Station, 28 Homebase and 29 sainsbury's and Policy 45 Tall and mid-rise Building zones. [See comments 596, 609, 616 and 1032]	See responses to comments 50594, 96, 609, 616 and 1032. No further amendments are required.
------	---	--	--	---

1034	Peter Willan and Paul Velluet, Old Deer Park Working Group	General comment (in relation to high rise development)	We are concerned at the support given for high rise development at the Richmond Station and elsewhere given the potential for interrupting views and vistas that are so important to the Old Deer Park. We comment on Site Allocation 24 Richmond Station and Policy 45 Tall and mid-rise Building zones. [See comment 1035]	See response to comment 1032 with regards to Richmond Station. Figure 424 on p. 327 of the Urban Design Study 2021 provides an illustrative view from Vu.City illustrating the potential visibility from within Old Deer Park. Whilst the upper parts of an 8 storey building would be visible in a bare earth view, in reality it would be largely screened by trees and vegetation around the park. No amendments to the text are required.
1035	Peter Willan and Paul Velluet, Old Deer Park Working Group	Policy 45.Tall and Mid-Rise Building Zones	<p>The wording of the Policy 45 needs to be substantially amended to omit any reference to the acceptability of development above five storeys (15 m.) in height anywhere in Character Areas F1, F2, F3 and G1 – whether defined as a 'Tall' or 'Mid-rise' buildings Accordingly, diagrams 27.21 and 27.22 – Richmond Station: Tall Building Zone and Mid-Rise Zone, and diagrams 27.24 and 27.25 – North Sheen (Lower Richmond Road and Homebase Sites): Tall Building Zone and Mid-rise Zone, in Appendix 3: Tall and Mid-rise Building Zones, need to be omitted or substantially amended, and the Policies Map adjusted accordingly. Such a policy would properly reflect the very maximum height of existing development across Character Areas F1, F2, F3 and G1 and in most other areas within the Borough. The highly contentious proposed policy of acceptance of 'Tall buildings and Mid-rise Zones development rising above five storeys (15 m.) would appear to be drawn from the design guidance contained in Sections 4.6, 5.2 and 5.5 and Appendix A of Arup's Urban Design Study, parts of which reflect a fundamentally flawed analysis and appreciation of the area, including parts of Sections A.3* and B.6, Figure 383 – Richmond and Richmond Hill Tall and Mid-rise Buildings Zone map (on page 254) and the diagrams under the heading 'F. Richmond and Richmond Hill' relating to the Richmond Station, the Homebase and Lower Richmond Road Sites (on page 255). * In particular the text and diagrams for the Richmond Station, Lower Richmond Road and North Sheen (Homebase) Sites contained under Tall Building Zone Place F for Richmond and Richmond Hill on pages 324 to 327.</p> <p>Finally, the highly questionable claim made in paragraph 22.12 of the supporting text for Policy 45 to the effect that 'Tall buildings can make a crucial, positive contribution to good design as well as providing densities supporting scheme viability, maximising the delivery of affordable housing and optimising the use of land' has no relevance at all to the existing urban character of Richmond, its sustainable development, its enhancement or the provision of 'affordable housing' for Londoners – let alone the delivery social housing. In this connection, it is significant that some of the highest density of housing in the Richmond area and other areas of London developed over the last one hundred and thirty years has been secured in developments rising to no greater than four or five storeys in height.</p>	Please see responses to comments 1030 and 1032 regarding the Urban Design Study methodology, Richmond Station, North Sheen and tall buildings' impact on townscape. No amendments to the text are necessary.
-	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	High rise development	[See comment 1033 in respect of high rise development and comment 1032 in respect of Policy 45]	See response to comment 1032 with regards to Richmond Station. No amendments are required.

Off

-	Peter Willan and Paul Velluet, Old Deer Park Working Group	High rise development	[See comment 1035 in respect of Policy 45 and high rise development which refer to Richmond Station]	Please see responses to comments 1030 and 1032 regarding the Urban Design Study methodology, Richmond Station, North Sheen and tall buildings' impact on townscape. No amendments to the text are necessary.
---	--	-----------------------	--	--



Draft Local Plan Pre-Publication Consultation

From 10 December 2021 to 31 January 2022

RESPONSE FORM

The Council is inviting comments on the first draft of the Local Plan.

The draft Local Plan sets out a 15-year strategic vision, objectives, place-based strategies and the overall spatial strategy for the borough as well as the planning policies that will guide future development in the borough. It looks ahead to 2039 and identifies where the main developments will take place, and how places within the borough will change, or be protected from change, over that period. In addition, the draft Local Plan sets out the site allocations that are considered to assist with the delivery of the vision and strategy of the Plan. This is of particular importance for ensuring there is sufficient land for employment, retail, housing and social infrastructure.

We would like to hear the views from our local communities, businesses and other key organisations on the draft Plan.

How to respond

Please read the consultation documents and other background information made available on the Local Plan website. To view the draft Local Plan and take part in the consultation, visit https://www.richmond.gov.uk/draft_local_plan_pre_publication_version

You can respond on the consultation documents in the following ways:

- Online response form through our **consultation portal** <https://richmond-consult.objective.co.uk/kse>
- Email to **LocalPlan@richmond.gov.uk** this response form (a PDF and Word version of the form can be found on the Council's website at https://www.richmond.gov.uk/draft_local_plan_pre_publication_version). In the form in 'Word' format you can type in your response and return it as an email attachment
- Post a hard copy of the form to Spatial Planning and Design, LB Richmond upon Thames, Civic Centre, 44 York Street, Twickenham, TW1 3BZ.

All responses must be received by Monday **31 January 2022**.

This form has three parts:

- Part A – Personal details and about you
- Part B – Your general views
- Part B – Your detailed response

Part A: Personal Details		
	1. Personal Details *	2. Agent's Details (if applicable)
Title	Messrs	
First name		
Last name	Willan, Velluet	
Job title (where relevant)		
Organisation (where relevant)	Old Deer Park Working Group	
Address	██████████ ██████████ ██████████	
Postcode	██████████	
Telephone	██████████	
E-mail address	██████████	

*If an agent is appointed, please complete only the title, name and organisation boxes but complete the full contact details of the agent.

Part A: About You...
<p>The Old Deer Park Working Group (the Group) comprises representatives of The Richmond Society, The Kew Society, The Friends of Richmond Green, The Friends of Old Deer Park and The St Margaret's Estate Residents Association. This submission represents the joint response from the Group.</p> <p>The Group was formed in 2012 in recognition of the particular ecological, historical and recreational importance of the Old Deer Park and has since then worked for encouraging and securing the preparation of a coherent strategy for the effective conservation, development and management of the Park. In June, 2012, the Group published its report: The Old Deer Park, Richmond - Re-connecting the Town to its local park - Realising an under-recognised parkland asset – A framework for conservation and enhancement. Since then, it has made a number of submissions to the Council on related issues. In this connection and importantly, the Group worked collaboratively with the Council and its consultants on the preparation of the Old Deer Park Supplementary Planning Document (as published in March, 2018). The Group has also worked, and continues to work, collaboratively with the Council on the planning and implementation of projects for the enhancement of the Park, including the recently completed, award-winning scheme for improvements at and adjacent to the Park Lane entrance to the Old Deer Park Car-park. The Group is currently working with the Council to link the Old Deer Park car park with the river Thames along the area between the A316 road and the railway. It is working with the Council on tree planting and with Thames Landscape Strategy in rewilding the ODP section of Thames Arcadia.</p>

3. Please tell us about yourself or who you are responding on behalf of...(tick all which apply)		
Do you live in the borough?	Yes X	No G
Do you work in the borough?	Yes G	No G
Do you run a business in the borough?	Yes G	No G
Are you a student in the borough?	Yes G	No G
Are you a visitor to the borough?	Yes G	No G

Data protection

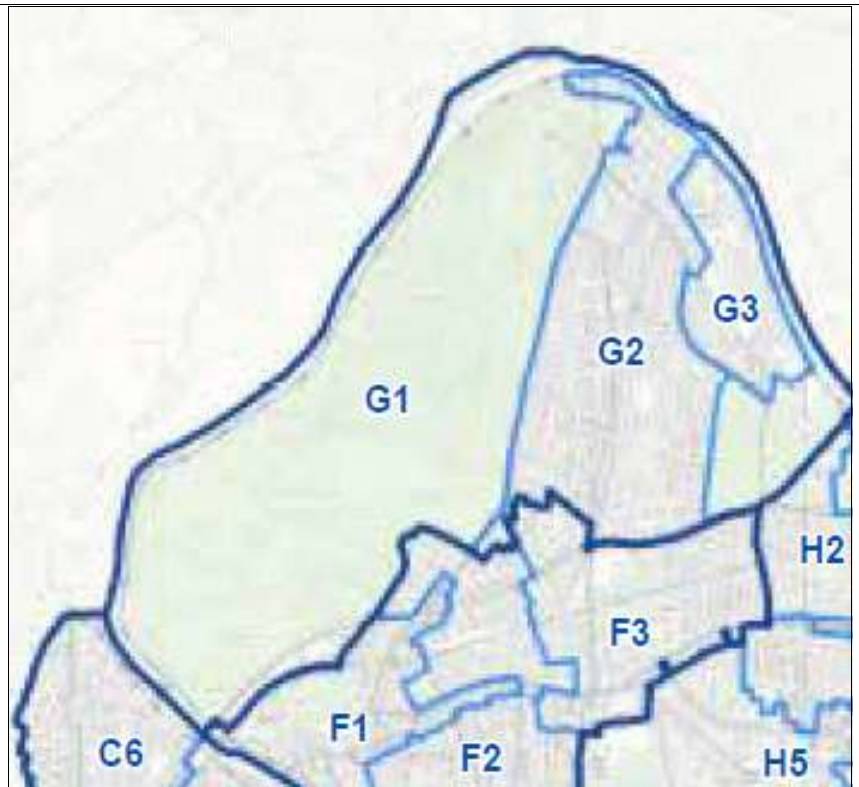
The Council is committed to ensuring that personal data is processed in line with the General Data Protection Regulation (GDPR) data protection principles including keeping data secure.

The Council's Privacy Notice is published on the webpage www.richmond.gov.uk/data_protection

All responses will be held by the London Borough of Richmond upon Thames. Responses will not be treated as confidential and will be published on our website and in any subsequent statements; however, personal details like address, phone number or email address will be removed.

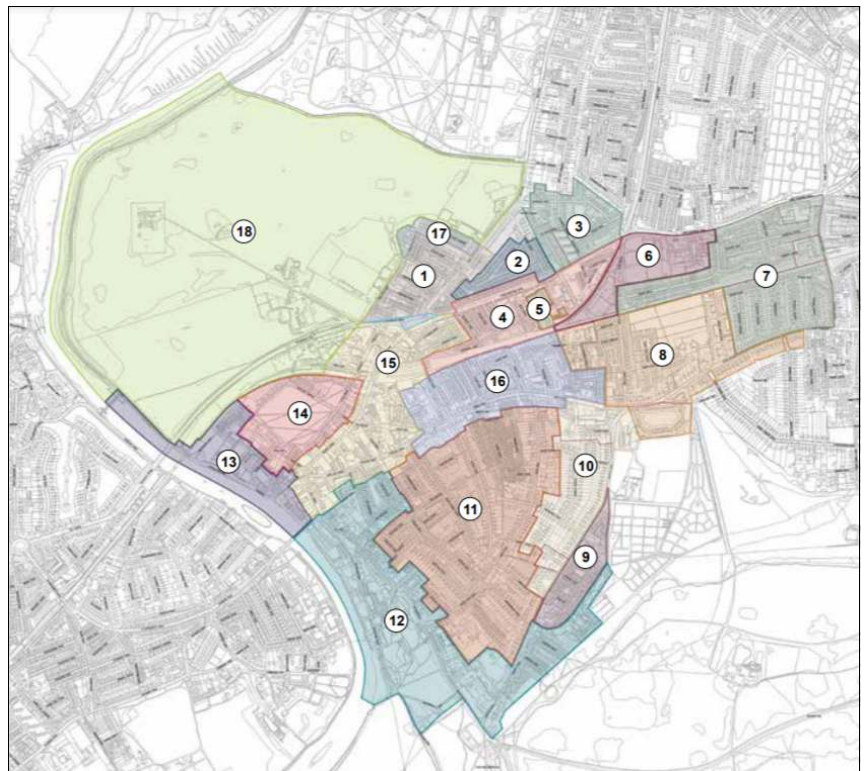
Part B: Your General Views

1. **Place Definitions.** Based on Section 3 – Character Areas in Arup's 432-page Urban Design Study, The Old Deer Park is incorrectly grouped with the Royal Botanic Gardens, Kew in Character Area 'G1 – Kew Gardens and Riverside' under the overall heading 'G –Kew'). Like Richmond Park, the Old Deer Park should be covered by its own Character Area as 'F4 – The Old Deer Park', under the overall heading of 'F – Richmond & Richmond Hill (sic)'. On this basis, other sections of Arup's Urban Design Study and to the Draft Local Plan need to be adjusted accordingly.
2. Indeed, more fundamentally, the proposed structure of 'Character Areas' as set out in Section 3 et seq. in Arup's Urban Design Study needs to be challenged. The proposed boundaries relate neither to the present Ward boundaries nor to the existing conservation area boundaries. They should surely be based for the most part on the present conservation areas and in this case the Old Deer Park Conservation Area.
3. Confusingly, the extant 'Richmond & Richmond Hill Village Plan' (2016) comprises all four areas plus Richmond and Richmond Hill residential (F2), North Sheen Residential (F3) and the Old Deer Park which is included in the Local Plan as Placed Based Strategy for Kew and has its own Old Deer Park Conservation Area Statement and SPD.
4. We have extracted the Character Area Map from Arup's Urban Design Study Dec 2021 and provided a Conservation Area Map so that members of the community reading our response can better understand the context.



Kew Character Areas (G1 ODP). Urban design Study Dec 2021

- Conservation Area 1: Kew Foot Road
- Character Area 2: The Pagoda Triangle
- Character Area 3: North of Lower Mortlake Road
- Character Area 4: South of Lower Mortlake Road
- Conservation Area 5: Sheendale Road
- Character Area 6: Old Gas Works
- Character Area 7: Between Lower and Upper Richmond Road
- Character Area 8: Kings Farm Avenue and surrounds
- Character Area 9: Queen's Road Estate
- Character Area 10: Queen's Road (west side)
- Conservation Area 11: St Matthias
- Conservation Area 12 Richmond Hill
- Conservation Area 13: Richmond Riverside
- Conservation Area 14: Richmond Green
- Conservation Area 15: Central Richmond
- Conservation Area 16: Sheen Road
- Character Area 17: Old Deer Park Gardens
- Conservation Area 18: Old Deer Park



Conservation Areas Richmond & Richmond Hill Village Plan

5. Local Plan covers the entire Borough so the Title should be Richmond-upon-Thames Local Plan and not simple Richmond Local Plan. **Needs remedying.**
6. Despite the page-numbers given in what appears to be the list of contents – but is not headed as such – there is no pagination in the entire document. **Needs remedying.**
7. Section 15 in the un-headed list of contents – titled 'Policies' - doesn't contain anything other than one photograph. Instead, the policies are set out in Sections 4 and 16 to 26 inclusive. **Needs remedying.**
8. The lists of page-numbers in the un-headed list of contents and the headed list of policies should be headed as such. **Needs remedying.**
9. Neither Section 2 nor Section 15 appears to include any reference to a Policies Map. Referring to the note contained under 'Policies Map for the Local Plan Review, 2015-2018' in the part of the Council's current Planning Policy web-site dealing with the current 'Adopted Local Plan' (adopted in July, 2018), it is clearly stated that 'The Council's Policies Map (formerly called the Proposals Map) will be updated in 2020 to reflect the Local Plan adopted in July, 2018 and March, 2020'. However, to date, this has never been done. There is no published Policies (formerly Proposals) Map beyond that published in July 2015. Prospect of Richmond has picked-up this omission in previous submissions. **The omission needs to be urgently remedied.**
10. So much in the Draft Local Plan derives from questionable analysis and recommendations in Arup's Urban Design Study and, in more limited part, this in Arup's 156-page Metropolitan Open Land Review Annexe Report. **Indeed, all these need to firmly challenged.**
11. The Arup MOL Review Annex Report;
 - a Parcel 28 page 92 is titled Little Green. **It should be Richmond Green,**
 - b Parcel 31 page 101 is titled Thames Old Deer Park. **It is not part of the Old Deer Park.**
12. **Sustainable Growth.** We responded to the Direction of Travel Consultation in 2020, wherein we questioned the need and advisability of replacing the Local Plan 2018 so soon. One of the four reasons then given by the Council was population growth but according to the Retail and Leisure Needs Study (2021), Richmond Borough population of 199,630 in 2021 is estimated to grow by only 2.8% to 205,200 in 2039. The estimate for Richmond Town and surrounding area (Zone 1) is for a decrease in population from 23,031 in 2021 to 22,536 in 2039. The absence of population growth feeds through into housing and into, retail, food/beverage and leisure uses and employment, housing, etc. in Richmond Town, so the estimates are important for the Local Plan. We comment on the Uses of Richmond Town in reference to **Policy 18.**
13. In view of the very limited estimated growth in population in Richmond Borough and a small decrease in Richmond Town and surrounding area (Zone 1) we believe it is important to emphasise "Improvement" as well as Growth. While population numbers may not grow there will be elements of the Local Plan where there is growth and elements where there is decline. Even without population growth, it is to be expected that there will be increasing prosperity and increasing disposable income and therefore growth in the uses of Richmond Town.

14. **Climate Change Emergency.** We welcome the increased emphasis given to climate change and pollution.
15. **Culture.** We support the attention given to the Cultural Policies and would like to see Richmond town centre play a significant role in the Council's Culture Richmond 2021-2031 Plan. We understand the Council expect to undertake a further Sports Review in 2022.
16. **High Rise development.** We are concerned at the support given for high rise development at the Richmond Station and elsewhere given the potential for interrupting views and vistas that are so important to the Old Deer Park. We comment on **Site Allocation 24 Richmond Station and Policy 45 Tall and mid-rise Building zones.**
17. **Site Allocation.** We respond here on **Site Allocations 32 and 28** and raise a number of concerns.
18. **MOL.** We respond here on MOL status and boundary anomalies and seek to remove any question of an important part of the Old Deer Park ceasing to being designated as MOL, as raised in Arup's MOL Review Annex Report. We comment further on **Policy 35 Green Belt, Metropolitan Open Land and Local Green Space.**
19. **Specific Policies.** We respond here to Policies **28, 29, 30, 35, 37, 43, 44 and 45.**
20. **Heathrow noise.** We propose Heathrow noise be given much more weight in the Local Plan, especially in response to the re- allocation of flight paths from Airspace Modernisation and the introduction of air taxis and drones. This is dealt with reference to the **Introduction paragraphs 2.44 and 2.45.**
21. **Richmond Town.** We recommend that the Old Deer Park should be covered by its own Character Area but the park's access from Richmond Town and proximity encourage the consultation response from the Prospect of Richmond on Richmond Town to be considered alongside this response from the Old Deer Park Working Group on the Old Deer Park.

4. Do you agree or disagree with the Strategic Vision? (section 3)				
Strongly Agree G	Agree X	Neither Agree/Disagree G	Disagree G	Strongly Disagree G
Any comments: We agree broadly with the Strategic Vision but with a number of caveats referred to in this response.				
5. Do you agree or disagree with the Strategic Objectives? (section 3)				
Strongly Agree G	Agree X	Neither Agree/Disagree G	Disagree G	Strongly Disagree G
Any comments: We agree broadly with the Strategic Objectives but with a number of caveats referred to in this response.				
6. Do you agree or disagree with Policy 1. Living Locally and the 20-minute neighbourhood? (section 4)				
Strongly Agree G	Agree X	Neither Agree/Disagree G	Disagree G	Strongly Disagree G
Any comments: We agree broadly with Policy 1 and the 20-minute neighbourhood.				
7. Do you agree or disagree with Policy 2. Spatial Strategy: Managing change in the borough? (section 4)				
Strongly Agree G	Agree X	Neither Agree/Disagree G	Disagree G	Strongly Disagree G
Any comments: We agree broadly with Policy 2, Spatial Strategy: Managing Change in th borough.				
8. Do you agree or disagree with the place-based strategies? (sections 6 to 14)				
Strongly Agree G	Agree G	Neither Agree/Disagree G	Disagree X	Strongly Disagree
Any Comments: Our response here on the Place-based Strategy: Kew and on Policy 28 – Local character and design quality (Strategic Policy) explains where we disagree.				

9. To which parts of the draft Local Plan does your response relate to?

Please indicate the documents and the specific paragraph numbers, policy or site allocation numbers and names, maps or tables you are commenting on.

Documents		Sections	
Draft Local Plan	X	Page number(s)	
		Paragraph number(s)	
		Policy no./name	
		Place-based strategy	12. Kew (Kew Gardens and Riverside)
		Site Allocation(s) no./ name	32. The Pools-on-the Park and Surroundings, Old Deer Park, Richmond
		Maps	
		Tables	
Sustainability Appraisal Report	G	Page number(s)	
		Paragraph number(s)	
Other (for example an omission or alternative approach, or in relation to another supporting document/evidence base)	X	Urban Design Study December 2021 (Character Area G1)	
		Old Deer Park Conservation Area Statement	
		Old Deer Park: The Crown Estate Landscape Strategy 1999	
		Old Deer Park Supplementary Planning Document 2018	
		Draft Statement of Significance	
		Old Deer Park: The Crown Estate Landscape Strategy 1999	
Old Deer Park Supplementary Planning Document 2018			

10. Please give details below to set out your representation.

Please make it very clear to which document your comments relate to by indicating policy/place-based strategy/site reference, name and number, and/or paragraph number.

Response:

Site Allocation 32 - The Pools-on-the-Park and Surroundings, Old Deer Park, Richmond

The fourth bullet-point in the draft text needs to be amended to refer to the fact that at present the Statement of Significance is only in an incomplete draft form and needs to be amended before formal adoption in order to take full account of the particular special interest and significance of the listed pools complex and its landscaped setting. (In this connection, the Old Deer Park Working Group has been pressing the Council to undertake such amendment repeatedly since March, 2018. The text also needs to take account of the repeated requests by the local community over the last forty years for the Pools complex and its surrounding landscaped setting to be designated as Metropolitan Open Land, like the parkland which surrounds them).

End

11. Please set out what change(s) you consider necessary, why these changes should be made and what your supporting evidence is.

Response:

See Response 10.

9. To which parts of the draft Local Plan does your response relate to?

Please indicate the documents and the specific paragraph numbers, policy or site allocation numbers and names, maps or tables you are commenting on.

Documents		Sections	
Draft Local Plan	X	Page number(s)	
		Paragraph number(s)	
		Policy no./name	
		Place-based strategy	12. Kew (Kew Gardens and Riverside)
		Site Allocation(s) no./name	33. Richmond Athletic Association Ground, Old Deer Park, Richmond
		Maps	
		Tables	
Sustainability Appraisal Report	G	Page number(s)	
		Paragraph number(s)	
Other (for example an omission or alternative approach, or in relation to another supporting document/evidence base)	X	Urban Design Study December 2021 (Character Area G1)	
		Old Deer Park Conservation Area Statement	
		Old Deer Park: The Crown Estate Landscape Strategy 1999	
		Old Deer Park Supplementary Planning Document 2018	

10. Please give details below to set out your representation.

Please make it very clear to which document your comments relate to by indicating policy/place-based strategy/site reference, name and number, and/or paragraph number.

Response:

Site Allocation 33 - Richmond Athletic Association Ground, Old Deer Park, Richmond

No change proposed.

End

11. Please set out what change(s) you consider necessary, why these changes should be made and what your supporting evidence is.

Response:

See Response 10.

9. To which parts of the draft Local Plan does your response relate to?

Please indicate the documents and the specific paragraph numbers, policy or site allocation numbers and names, maps or tables you are commenting on.

Documents		Sections	
Draft Local Plan	<input checked="" type="checkbox"/>	Page number(s)	
		Paragraph number(s)	
		Policy no./name	28 Local character and design quality (Strategic Policy)
		Place-based strategy	
		Site Allocation(s) no./name	
		Maps	
		Tables	
Sustainability Appraisal Report	G	Page number(s)	
		Paragraph number(s)	
Other (for example an omission or alternative approach, or in relation to another supporting document/evidence base)	G		

10. Please give details below to set out your representation.

Please make it very clear to which document your comments relate to by indicating policy/place-based strategy/site reference, name and number, and/or paragraph number.

Response

POLICY 28 – Local character and design quality (Strategic Policy)

The wording of Part A of the Policy needs to be amended to refer to the Borough's conservation areas as well as to the 'character areas' and 'places' identified in the Borough-wide characterisation work undertaken as part of Arup's Urban Design Study given the statutory protection enjoyed by such designated heritage assets under the provisions of the Planning (Listed Buildings and Conservation Areas) Act, 1990, and the National Planning Policy Framework .

The wording needs to be further amended to define 'the places' identified in Arup's Urban Design Study, and the purpose of such a designation.

11. Please set out what change(s) you consider necessary, why these changes should be made and what your supporting evidence is.

Response:

See Section 10.

9. To which parts of the draft Local Plan does your response relate to?

Please indicate the documents and the specific paragraph numbers, policy or site allocation numbers and names, maps or tables you are commenting on.

Documents		Sections	
Draft Local Plan	<input checked="" type="checkbox"/>	Page number(s)	
		Paragraph number(s)	
		Policy no./name	29 Designated heritage assets
		Place-based strategy	
		Site Allocation(s) no./name	
		Maps	
		Tables	
Sustainability Appraisal Report	G	Page number(s)	
		Paragraph number(s)	
Other (for example an omission or alternative approach, or in relation to another supporting document/evidence base)	G		

10. Please give details below to set out your representation.

Please make it very clear to which document your comments relate to by indicating policy/place-based strategy/site reference, name and number, and/or paragraph number.

Response

Policy 29 – Designated heritage assets

No change proposed.

11. Please set out what change(s) you consider necessary, why these changes should be made and what your supporting evidence is.

Response:

See Section 10.

9. To which parts of the draft Local Plan does your response relate to?

Please indicate the documents and the specific paragraph numbers, policy or site allocation numbers and names, maps or tables you are commenting on.

Documents		Sections	
Draft Local Plan	<input checked="" type="checkbox"/>	Page number(s)	
		Paragraph number(s)	
		Policy no./name	30 Non-designated heritage assets
		Place-based strategy	
		Site Allocation(s) no./ name	
		Maps	
		Tables	
Sustainability Appraisal Report	G	Page number(s)	
		Paragraph number(s)	
Other (for example an omission or alternative approach, or in relation to another supporting document/evidence base)	G		

10. Please give details below to set out your representation.

Please make it very clear to which document your comments relate to by indicating policy/place-based strategy/site reference, name and number, and/or paragraph number.

Response

Policy 30 – Non-designated heritage assets

No change proposed.

11. Please set out what change(s) you consider necessary, why these changes should be made and what your supporting evidence is.

Response:

See Section 10.

9. To which parts of the draft Local Plan does your response relate to?

Please indicate the documents and the specific paragraph numbers, policy or site allocation numbers and names, maps or tables you are commenting on.

Documents		Sections	
Draft Local Plan	<input checked="" type="checkbox"/>	Page number(s)	
		Paragraph number(s)	
		Policy no./name	35 Green Belt, Metropolitan Open Land and Local Green Space
		Place-based strategy	
		Site Allocation(s) no./name	
		Maps	
		Tables	
Sustainability Appraisal Report	G	Page number(s)	
		Paragraph number(s)	
Other (for example an omission or alternative approach, or in relation to another supporting document/evidence base)	G		

10. Please give details below to set out your representation.

Please make it very clear to which document your comments relate to by indicating policy/place-based strategy/site reference, name and number, and/or paragraph number.

Response

Policy 35 – Green Belt, Metropolitan Open Land and Local Green Space

Under the heading ‘Proposed changes to the Policies Map’ the landscaped open-space setting of the listed Pools-on-the-Park complex in the Old Deer Park Working needs to be annotated as Metropolitan Open Land in the Policies Map as repeatedly urged by the local community over the last forty years in order to reflect its significant functional and landscape roles and in order to relate to the designation of the surrounding parkland as Metropolitan Open Land. In this connection, it is noted that neither Section 2 nor Section 15 of the draft Local Plan appears to include any reference to a Policies Map. Referring to the note contained under ‘Policies Map for the Local Plan Review, 2015-2018’ in the part of the Council’s current Planning Policy web-site dealing with the current ‘Adopted Local Plan’ (adopted in July, 2018), it is clearly stated that ‘The Council’s Policies Map (formerly called the Proposals Map) will be updated in 2020 to reflect the Local Plan adopted in July, 2018 and March, 2020’. However, to date, this has never been done. There is no published Policies (formerly Proposals) Map beyond that published in July 2015. Prospect of Richmond has picked-up this omission in previous submissions. The omission needs to be urgently remedied.

(In Arup’s 156-page Metropolitan Open Land Review - Annex Report, the Old Deer Park South of A316 ‘Parcel’ (sic) – no. 26 has been severed, wholly unjustifiably, from the remainder of the Old Deer Park covered in the Old Deer Park and Kew Gardens ‘Parcel’ – no. 24 and that part of the Park contained in the Old Palace Lane Richmond Riverside ‘Parcel’ – no. 29), despite its forming an integral part of the Old Deer Park as a specifically registered historic park and a specifically designated conservation area, and its designation with those parts of the Park on the north-western side of the Twickenham Road and the

south-eastern side of the railway viaduct as Metropolitan Open Land and Public Open Space. Importantly, this part of the Park is the most readily and easily accessible part of the public Park from the remainder of the Town and the Riverside on foot given its proximity to the heart of the Town and public transport and car-parking provision. Such a severance in the Metropolitan Open Land Review reflects a fundamentally flawed analysis of the area. Similarly and equally open to serious question is the finding that 'the eastern third of the parcel, is developed and does not meet the MOL criteria' and that its MOL status should be considered further. The parcel is certainly NOT 'largely inaccessible to people' as claimed in the assessment; not least, because it provides an integral part of a direct pedestrian link between Richmond Station, Parkshot, Park Lane, the Old Deer Park Car-park, Richmond Green and the riverside at its south-western end.

In relation to the The Green and Little Green, Richmond 'Parcel' – no. 28, the assessment that these two, vastly important, inter-related public open spaces are only assessed as only 3, 2, 3, 3 and 3 in the criteria summary, rather than as 5, 5, 5, 5 and 5, clearly reflects a fundamentally flawed analysis of the area and failure to recognise its accessibility to the riverside and the heart of the Town. Described by Bridget Cherry and the late Nikolaus Pevsner in relevant volume of *The Buildings of England – London 2: South* as 'one of the most beautiful urban greens surviving anywhere in England', Richmond Green possesses not only considerable architectural, historic and landscape interest and significance, but importantly, constitutes a public open space of outstanding amenity value to the local and wider community.

11. Please set out what change(s) you consider necessary, why these changes should be made and what your supporting evidence is.

Response:

See Section 10.

9. To which parts of the draft Local Plan does your response relate to?

Please indicate the documents and the specific paragraph numbers, policy or site allocation numbers and names, maps or tables you are commenting on.

Documents		Sections	
Draft Local Plan	<input checked="" type="checkbox"/>	Page number(s)	
		Paragraph number(s)	
		Policy no./name	37 Public open space, play, sport and recreation
		Place-based strategy	
		Site Allocation(s) no./name	
		Maps	
		Tables	
Sustainability Appraisal Report	G	Page number(s)	
		Paragraph number(s)	
Other (for example an omission or alternative approach, or in relation to another supporting document/evidence base)	G		

10. Please give details below to set out your representation.

Please make it very clear to which document your comments relate to by indicating policy/place-based strategy/site reference, name and number, and/or paragraph number.

Response

POLICY 37 – Public open space, play, sport and recreation - No change proposed.

No change proposed.

11. Please set out what change(s) you consider necessary, why these changes should be made and what your supporting evidence is.

Response:

See Section 10.

9. To which parts of the draft Local Plan does your response relate to?

Please indicate the documents and the specific paragraph numbers, policy or site allocation numbers and names, maps or tables you are commenting on.

Documents		Sections	
Draft Local Plan	<input checked="" type="checkbox"/>	Page number(s)	
		Paragraph number(s)	
		Policy no./name	43 Floodlighting and other external artificial lighting
		Place-based strategy	
		Site Allocation(s) no./ name	
		Maps	
		Tables	
Sustainability Appraisal Report	G	Page number(s)	
		Paragraph number(s)	
Other (for example an omission or alternative approach, or in relation to another supporting document/evidence base)	G		

10. Please give details below to set out your representation.

Please make it very clear to which document your comments relate to by indicating policy/place-based strategy/site reference, name and number, and/or paragraph number.

Response

POLICY 43 – Floodlighting and other external artificial lighting

No change proposed.

11. Please set out what change(s) you consider necessary, why these changes should be made and what your supporting evidence is.

Response:

See Section 10.

9. To which parts of the draft Local Plan does your response relate to?

Please indicate the documents and the specific paragraph numbers, policy or site allocation numbers and names, maps or tables you are commenting on.

Documents		Sections	
Draft Local Plan	<input checked="" type="checkbox"/>	Page number(s)	
		Paragraph number(s)	
		Policy no./name	44 Design Process
		Place-based strategy	
		Site Allocation(s) no./name	
		Maps	
		Tables	
Sustainability Appraisal Report	G	Page number(s)	
		Paragraph number(s)	
Other (for example an omission or alternative approach, or in relation to another supporting document/evidence base)	G		

10. Please give details below to set out your representation.

Please make it very clear to which document your comments relate to by indicating policy/place-based strategy/site reference, name and number, and/or paragraph number.

Response

POLICY 44 – Design Process

The wording of Part B of the Policy needs to be amended to omit reference to ‘the design guidance for the relevant character area as specified within the Urban Design Study 2021’ insofar as it refers to Tall and Mid-rise Building Zones in Figure 383 (on page 254) and in ‘F. Richmond and Richmond Hill’ (on page 255).

11. Please set out what change(s) you consider necessary, why these changes should be made and what your supporting evidence is.

Response:

See Section 10.

9. To which parts of the draft Local Plan does your response relate to?

Please indicate the documents and the specific paragraph numbers, policy or site allocation numbers and names, maps or tables you are commenting on.

Documents		Sections	
Draft Local Plan	<input checked="" type="checkbox"/>	Page number(s)	
		Paragraph number(s)	
		Policy no./name	45 Tall and mid-rise zones
		Place-based strategy	
		Site Allocation(s) no./name	
		Maps	
		Tables	
Sustainability Appraisal Report	G	Page number(s)	
		Paragraph number(s)	
Other (for example an omission or alternative approach, or in relation to another supporting document/evidence base)	G		

10. Please give details below to set out your representation.

Please make it very clear to which document your comments relate to by indicating policy/place-based strategy/site reference, name and number, and/or paragraph number.

Response

POLICY 45 –Tall and mid-rise zones

The wording of the Policy 45 needs to be substantially amended to omit any reference to the acceptability of development above five storeys (15 m.) in height anywhere in Character Areas F1, F2, F3 and G1 – whether defined as a ‘Tall’ or ‘Mid-rise’ buildings. Accordingly, diagrams 27.21 and 27.22 – Richmond Station: Tall Building Zone and Mid-Rise Zone, and diagrams 27.24 and 27.25 – North Sheen (Lower Richmond Road and Homebase Sites): Tall Building Zone and Mid-rise Zone, in Appendix 3: Tall and Mid-rise Building Zones, need to be omitted or substantially amended, and the Policies Map adjusted accordingly. Such a policy would properly reflect the very maximum height of existing development across Character Areas F1, F2, F3 and G1 and in most other areas within the Borough. The highly contentious proposed policy of acceptance of ‘Tall buildings and Mid-rise Zones development rising above five storeys (15 m.) would appear to be drawn from the design guidance contained in Sections 4.6, 5.2 and 5.5 and Appendix A of Arup's Urban Design Study, parts of which reflect a fundamentally flawed analysis and appreciation of the area, including parts of Sections A.3* and B.6, Figure 383 – Richmond and Richmond Hill Tall and Mid-rise Buildings Zone map (on page 254) and the diagrams under the heading ‘F. Richmond and Richmond Hill’ relating to the Richmond Station, the Homebase and Lower Richmond Road Sites (on page 255). * In particular the text and diagrams for the Richmond Station, Lower Richmond Road and North Sheen (Homebase) Sites contained under Tall Building Zone Place F for Richmond and Richmond Hill on pages 324 to 327.

Finally, the highly questionable claim made in paragraph 22.12 of the supporting text for Policy 45 to the effect that ‘Tall buildings can make a crucial, positive contribution to good design as well as providing densities supporting scheme viability, maximising the delivery of affordable housing and optimising the use of land’ has no relevance at all to the existing urban character of Richmond, its sustainable

development, its enhancement or the provision of 'affordable housing' for Londoners – let alone the delivery social housing. In this connection, it is significant that some of the highest density of housing in the Richmond area and other areas of London developed over the last one hundred and thirty years has been secured in developments rising to no greater than four or five storeys in height.

11. Please set out what change(s) you consider necessary, why these changes should be made and what your supporting evidence is.

Response:

See Section 10.

9. To which parts of the draft Local Plan does your response relate to?

Please indicate the documents and the specific paragraph numbers, policy or site allocation numbers and names, maps or tables you are commenting on.

Documents		Sections	
Draft Local Plan	<input type="checkbox"/>	Page number(s)	
		Paragraph number(s)	
		Policy no./name	
		Place-based strategy	
		Site Allocation(s) no./name	
		Maps	
		Tables	
Sustainability Appraisal Report	G	Page number(s)	
		Paragraph number(s)	
Other (for example an omission or alternative approach, or in relation to another supporting document/evidence base)	X	Draft new Local Plan Introduction Section 2.44 and 2.45 Heathrow	

10. Please give details below to set out your representation.

Please make it very clear to which document your comments relate to by indicating policy/place-based strategy/site reference, name and number, and/or paragraph number.

Response

Draft new Local Plan Introduction Section 2.44 and 2.45 Heathrow

The only reference to Heathrow in the Local Plan is in Introduction Section 2.44 and 2.45, where it is stated that *'The Council, in line with the Mayor of London, strongly opposes any further expansion at Heathrow and supports measures to minimise the impacts of Heathrow, particularly on traffic, noise and air quality. The Council's position on Heathrow is set out in the Corporate Plan 2018 – 2022. This sets out that the Council remain opposed to the Government's decision to expand Heathrow Airport, a third runway and further night flights,..'* *'The Council's Local Plan does not contain a policy on Heathrow as the airport does not lie within the borough boundary.'*

There is an SPD: Development Control for Noise Generating and Noise Sensitive Development, 2018, which refers to Heathrow but in our view is substantially deficient in this respect.

Government/CAA required Airspace Modernisation is fully underway with potentially substantial changes to flight path noise allocation, while Heathrow expansion is on hold and may never take place. The airspace is an important "asset" above Richmond residents (not only for Heathrow traffic but increasingly for air taxis, drones, etc).

There is a set of Rules established by ICAO (the UN aviation body) for noise management which is the Balanced Approach. It sets the priorities - starting with reduction of noise at source (i.e. less noisy aircraft), followed by land use, operations and finally restricting traffic movements. Land use is about not developing housing and vulnerable uses and/or mitigating noise where there is significant noise impact on health and well being from overflight.

There are other national noise policies that could be deployed to deal with Heathrow noise.

At the moment the Noise England Statement on Noise 2010 uses a threshold of 51 decibels (LAeq) for daytime. Heathrow aircraft noise levels in Richmond borough are at least 60 dbA in some places. WHO Guidance threshold levels are 45 dbA day and 40dbA night.

Under these circumstances, and given our long involvement as Richmond Heathrow Campaign, we recommend the Council develop a Planning Approach and Policy to deal with housing and other developments exposed to noise from Heathrow aircraft and from the emerging air taxis and drones. A number of developments, such as at Manor Road and Stag Brewery would be significantly affected by aircraft noise, especially on arrivals under the Heathrow landing flight paths. But Airspace Modernisation will affect the whole borough potentially and while the 4 year process takes place there will be uncertainty and blight.

We are engaged with Heathrow and other local authorities on this topic and would be pleased to contribute to Richmond council's future deliberations.

11. Please set out what change(s) you consider necessary, why these changes should be made and what your supporting evidence is.

Response:

See Section 10.

Signed on behalf of The Old Deer Park Working Group,
Peter Willan, Chair
Paul Velluet, member of the executive committee
31 January 2022

DRAFT LOCAL VIEWS SUPPLEMENTARY PLANNING DOCUMENT (SPD)

Richmond-Upon-Thames Council (the Council) Consultation Response from The Old Deer Park Working Group (ODPG) 5 September 2022 DRAFT PW

INTRODUCTION

This response is written on behalf of the Old Deer Park Working Group. The ODPG comprises five societies: The Richmond Society, The Kew Society, The Friends of Richmond Green, The Friends of Old Deer Park and The St Margarets Estate Residents Association. The Group was established in 2012 to encourage the effective conservation and improvement of the Old Deer Park. We work closely with the Council's Parks and Tree Teams on several projects to preserve and enhance the ODP and are in the process of progressing with the Council a Tree Planting Plan for the ODP, which includes recognising views and vistas.

Stretching from Richmond to Kew Gardens, the Old Deer Park has evolved over more than seven centuries from a private royal domain to the metropolitan open space it is today. Views and vistas to and from and within the Old Deer Park and to/from are a very important feature of the park and their status as a conservation area.

The Kim Wilkie Strategy for the Crown Estate, who owns the ODP, identified a number of views and vistas from the King's Observatory and these have been referred to in the ODP SPD 2018. The adopted and proposed new views in the draft Local Views SPD takes account of only some of these views. In this response we refer to these additional linear views and also a 360 degree landscape view from within the ODP, which we explain later. We understand that the ODP Conservation Area Study will be refreshed in the near future along with other Conservation Area Studies in the borough. It will be important to integrate the Local Views SPD with the ODP Conservation Area Statement and Management Plan.

Some of the adopted and new proposed views require gaps and some of these are currently impeded by trees and vegetation which we identify in this response.

We have approached the subject of views in the context of the Local Plan Policy LP5 and the relevance of the views to the setting of Heritage assets and to visual amenity. LP5 Views and Vistas says *'Seeks to protect and improve the quality of views, vistas, gaps and the skyline which contribute significantly to the character and quality of the local and wider area.'*

For ease of reference we include in the Annex the data sheet for each of the adopted and new views proposed. The Friends of Richmond Green are also responding to the consultation and we recommend cross referencing with their response. Their focus is on the Richmond Green and Riverside Conservation Areas but when discussing Views they should not be confined to one or other Conservation Area.

In summary, the ODPG support the continuation of the adopted views and the proposed new views listed in the draft Local Views SPD and recommend some additional linear and landscape views for consideration. We also recommend ongoing maintenance of gaps in the landscape to preserve the views; we have sought to identify where these are currently impeded or are likely to be.

SELECTED VIEWS FROM DRAFT SPD RELEVANT TO THE OLD DEER PARK

C5.1	Twickenham Bridge (north-east)	Prospect	
C5.2	Twickenham Bridge (south-east)	Prospect	
C6.1	Richmond Lock & Weir	Prospect	
C6.2	St Margarets Riverside	Prospect	
C6.3	View of the Great Pagoda St Margarets	Linear	
G1.1	Kings Observatory, Old Deer Park	Linear	
G1.2	King's Observatory towards Kew Gardens	Linear	New
G1.3	Kings Observatory towards Richmond Town Centre	Linear	New
G1.11	Old Deer Park Riverside	Prospect	New

PRESENTATION

1. We wish to make some suggestions on presentation to provide clarity and accuracy so that those less familiar with a view can be sure of the facts.
 - a. Most images for the views display a marker for the viewing location but G1.11 *Old Deer Park Riverside* omits any marker?



Figure 1
Marker at
Viewing
Location

- b. Prospect views understandably do not have a single line showing the direction of a wide landscape, parkscape or riverscape view without a specific end point but linear views do, except C6.3 *View of the Great Pagoda, St Margarets (Linear Adopted)* ?
- c. The viewing location for the views appears to be variable even when there is a view marker - spread over an area, e.g. C6.2 *St Margarets Riverside Ranelagh Drive and surrounding paths (Prospect Adopted)*, and G1.11 *Old Deer Park Riverside (Prospect New)*.
- d. Local Views map
 - i. Detail in the map is insufficient to be able to identify viewing locations and specific view end points (often the end points can be guessed at but not for all of the views).
 - ii. It would seem the map shows all four linear views relevant to the ODPG with a line. The map is busy with views and it would help to distinguish the views by having directional arrows on the lines and an arrow for each of the non-linear views.

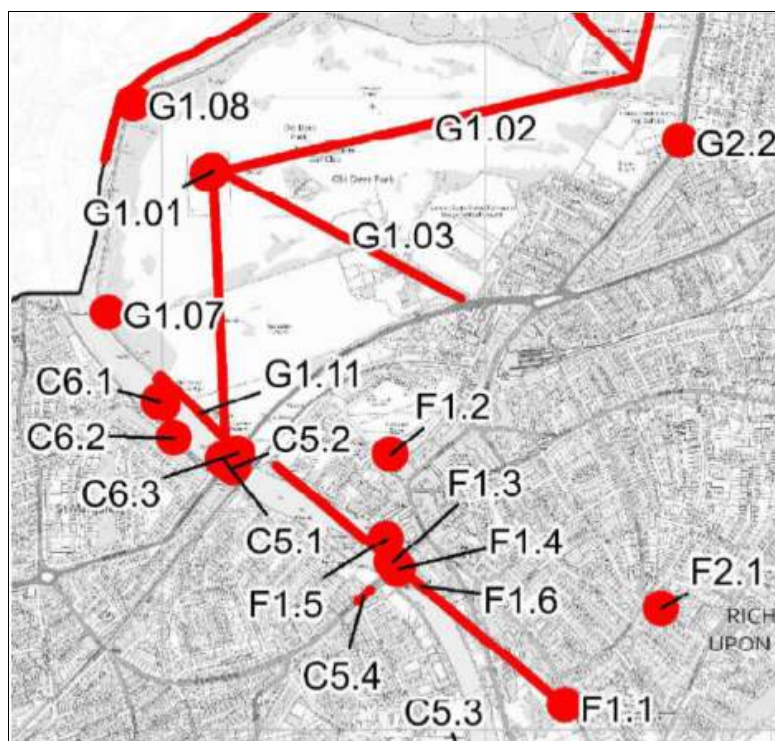


Figure 2 Extract from Local Views Map July 2022 for consultation

- e. Consistency on titles of views could be improved. Most of the titles start with the viewing location, e.g. Richmond Bridge. But 6.3 is titled *View of the Great Pagoda, St Margarets*. G1.1 is titled *King's Observatory, Old Deer Park* and we suggest it would be better titled '*King's Observatory towards stone obelisks*', however there is some uncertainty as to the exact view G1.1 portrays.
- f. Images for improvement:
 G1.2 *King's Observatory view towards Kew Gardens (Linear New)* and G1.3 *King's Observatory view towards Richmond Town centre (Linear New)*, have yet to be provided by the Council and so our support is provisional at this stage.

TREE MANAGEMENT NEEDED TO IMPROVE VIEWS

1. C6.3 *View of the Great Pagoda, St Margarets (Linear Adopted)*. The Pagoda cannot be identified in the image Figure 3 overpage. The Pagoda is hidden by tree growth on the riverbank and in the ODP. Figure 4 is a view from the marker on the Richmond Riverside by Twickenham Bridge. The Pagoda is directly behind the clump of trees in the centre of the image. The Old Deer Park Working Group are in discussion with the Council Parks Team about re-instating this and other views within and to and from the Old Deer Park.



Figure 3 C6.3 View of Great Pagoda, St Margarets Linear Adopted



Figure 4 C6.3 Linear view of Pagoda blocked by trees

2. *G1.1 King's Observatory, Old Deer Park Linear Adopted*

We suggest that the View from the King's Observatory to the stone obelisks needs further opening of the gap along the boundary of ODP Recreation Ground and Royal Mid Surrey Golf Course. Some work has been undertaken in the recent past. The ODPG is liaising with the Council's Parks Team and others. The Image Figure 5 provided with the SPD is not in the right line between the Observatory and the stone obelisks but it shows the gap.



Figure 5 G1.1 King's Observatory, to stone Obelisks showing gap

NEW VIEWS PROPOSED BY ODPG

1. Old Deer Park Views Landscape

We suggest a 360 degree approach to views be adopted for the Recreation Ground of the Old Deer Park. Figure 6 shows a typical uninterrupted view to the south west from within the ODP as an example. Figures 7 and 8 show where the ODP 360 degree view has been interrupted and we suggest a 360 degree view is needed to protect further interruptions.



Figure 6 Example of ODP skyline to south-east



Figure 7 Example of ODP skyline to north west with tall building interrupting view



Figure 8 Example of ODP skyline to south east with tall building interrupting view

2. **Old Deer Park Linear**

The Crown Estate Strategy for the Old Deer Park proposes a number of linear views from the King's Observatory. One has already been adopted G1.1 *King's Observatory to stone obelisks*. Two are proposed by the SPD G1.2 *King's Observatory towards Kew Gardens* and G1.3 *King's Observatory towards Richmond Town Centre*. But from the Crown Estate map others should be considered. The Old Deer Park SPD 2018 replicated some of these, see Figure 11.



Figure 9 ODP Strategy 1999 Crown Estate Views from the King's Observatory and Syon House



Figure 10 ODP Crown Estate Strategy views & vistas Source Riverside markers

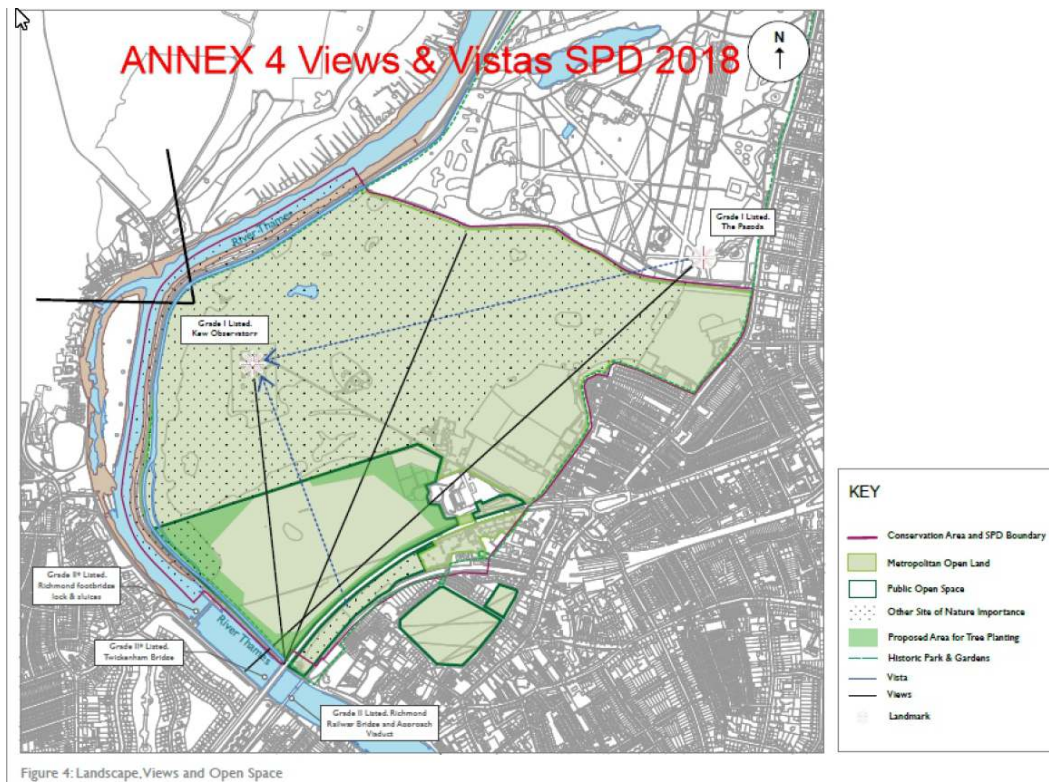


Figure 11 ODP Landscape Views and Open Space. Source ODP SPD 2018

The ODP SPD 2018 makes a number of important points about views and vistas: Page 23 says ‘There are a number of important Views and Vistas across the Park. These are primarily related to The King’s Observatory and the related meridian lines, (which are denoted by a number of obelisks located at different points within the Park) and to the Pagoda within the Royal Botanic Gardens, Kew (which is a Grade I Listed Building and is a landmark within the wider area). However, these have been obscured over the course of time, including as a result of the encroachment of scrub vegetation along the towpath and within the Royal Mid-Surrey Golf Club. In addition tree overhang along the towpath including between, the Old Deer Park Recreation Ground and the Royal Mid-Surrey Golf Club also has an impact. There are real opportunities to improve/open up these views and vistas by appropriate removal or pruning of trees and vegetation although there are some areas where this needs careful consideration to ensure that it doesn’t result in disturbance to important fauna. ‘Grow back’ has occurred following previous clearance works. There is therefore a need to introduce a regular maintenance regime for these areas.’

In particular there are opportunities to provide information on, and better identify the views to The King’s Observatory from within the Park and from adjacent areas. This could reflect the approach taken by the Crown Estate ‘marker’ on the towpath. However, these are need of maintenance.

In regard to the Richmond Athletic Association Ground (ODP) the SPD discusses the re-development of the grandstand and the potential for improving views from the King’s Observatory but also possible adverse impacts on other views. There is also discussion on improvement of the Old Deer Park car park and beneficial impact on views. The ODPG would welcome the opportunity of working with the Council in

identifying the additional linear views that might be considered based on the Crown Estate's Strategy.

3. **Twickenham Road Footbridge to St Matthias Church Spire (Linear)**

St Matthias Church spire is a significant landmark with views from many parts of south-west London. Figures 12 and 14 shows a view from the Twickenham Road Footbridge and another from within the ODP Recreation Ground. Figure 13 shows a view from Richmond Green. We suggest consideration be given to adopting one or more of these views.



Figure 12 Twickenham Road Footbridge view to St Matthias Church, Richmond Hill



Figure 13 Richmond Green view to St Matthias Church, Richmond Hill



Figure 14 ODP view to St Matthias Church, Richmond Hill

4. **Richmond Hill to King's Observatory Old Deer Park (Linear)**

Views involving the King's Observatory are usually linear views from the Observatory but Figure 15 shows a view from near the top of Richmond Hill at the junction between Montague Road and Friars Stile Road. We have not had the time to confirm the view but it is probably the only view from Richmond Hill and we suggest consideration be given to its adoption.



Figure 15 Richmond Hill
(Montague Road) to King's
Observatory ODP

PeterWillan, BScEng(Hons),MBA,ARSM, FCMA, FEI, HonRCM,
Chairman, The Old Deer Park Working Group.

PaulVelluet, B.A.Hons, B.Arch. Hons,M.Litt., RIBA, IHBC, Chartered Architect,
Member of the Old Deer Park Working Group

Contact willan829@btinternet.com

Annex attached: View Data Sheets

ANNEX
SELECTED VIEWS FROM DRAFT SPD RELEVANT TO THE OLD DEER PARK

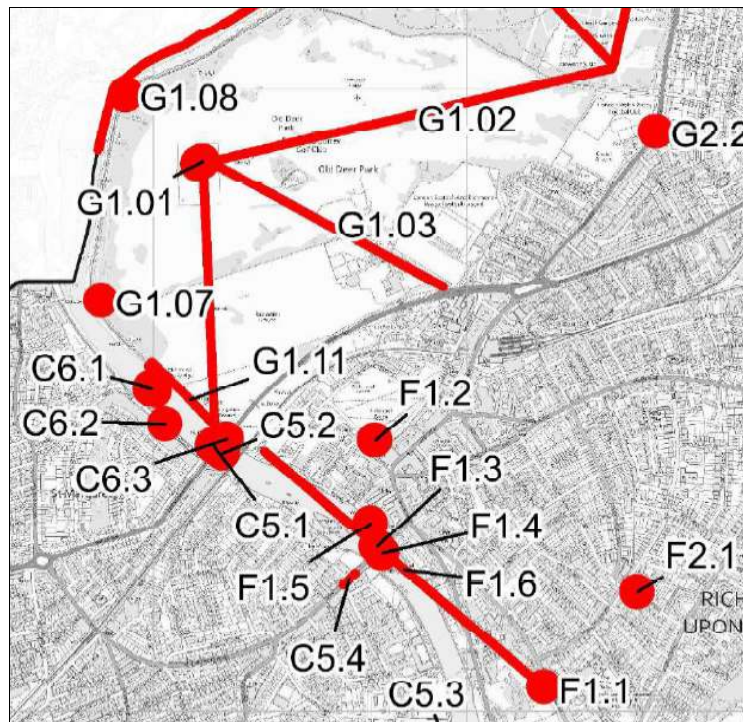


Figure 1 Extracted from Local Views Map July 2022 for consultation

- C5.1 Twickenham Bridge (north-east), Prospect
- C5.2 Twickenham Bridge (south-east), Prospect
- C6.1 Richmond Lock & Weir, Prospect,
- C6.2 St Margarets Riverside, Prospect
- C6.3 View of the Great Pagoda St Margarets, Linear
- G1.1 Kings Observatory, Old Deer Park, Linear
- G1.2 King's Observatory towards Kew Gardens, Linear
- G1.3 Kings Observatory towards Richmond Town Centre, Linear
- G1.11 Old Deer Park Riverside, Prospect

Character Area Name:

East Twickenham Residential

View Name and Reference:

Twickenham Bridge (north-east) (C5.1)

View Type:

Prospect

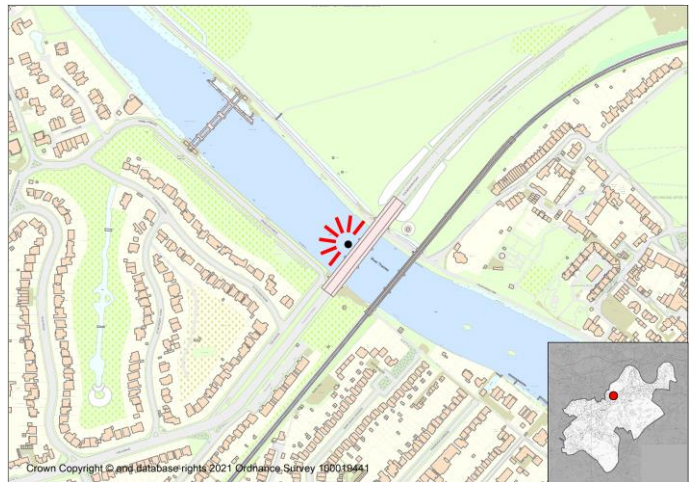
Description of View

View from Twickenham Bridge (north-east); travelling into London, spectacular view open up from both the railway and road bridge; encompassing:

- (left) the Victorian Richmond Lock and Weir and the open landscape of the Old Deer Park (usually flooded in winter);
- (left) glimpsed views of the King's Observatory may be possible in the winter;
- (centre) Old Palace Yard river front gardens; and, Richmond Riverside terraces and commercial activity; and,
- (right) view along the River Thames toward Richmond Hill, the Terrace Gardens, and Petersham Meadows.



View: C5.1



GIS Mapping: C5.1

Viewing Place:

Bridgescape view (wide)

Viewing Location:

Twickenham Bridge

Viewing Co-ordinates:

E: n/a

N: n/a

Reference Policy:

Adopted Local Plan

Urban Design Study: view 9, 10 and view 11 (from Richmond Bridge to Twickenham Bridge)

Adopted Local Plan landmarks – Twickenham Bridge, Richmond Lock, Kew Observatory

Visual Management Guidance

Foreground:

Twickenham Bridge low Italianate balustrade wall with Victoria cast iron gas light standards

Middle ground:

River Thames: urban and landscape character

Background:

Richmond Town Centre buildings (rising on Richmond Hill);
Richmond Bridge

Character Area Name:

East Twickenham Residential

View Name and Reference:

Twickenham Bridge (south-east) (C5.2)

View Type:

Prospect

Description of View

View from Twickenham Bridge (south-east); travelling out London, spectacular view open up from both the railway and road bridge; encompassing:

- (left) Corporation Island, private gardens and moorings edging the River Thames; and,
- (right) Ranelagh Drive and St Margarets Riverside.



View: C5.2



GIS Mapping: C5.2

Viewing Place:

Bridgescape view (wide)

Viewing Location:

Twickenham Bridge

Viewing Co-ordinates:

E: n/a

N: n/a

Reference Policy:

Adopted Local Plan

Urban Design Study: view 9 to 12

Adopted Local Plan landmark – Twickenham Bridge

Visual Management Guidance

Foreground:

Twickenham Bridge low Italianate balustrade wall with Victoria cast iron gas light standards

Middle ground:

River Thames: landscaped embankment and parklands

Background:

Residential housing and gardens

Character Area Name:

St Margarets Residential

View Name and Reference:

Richmond Lock and Weir

(C6.1)

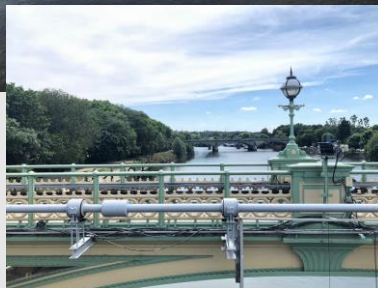
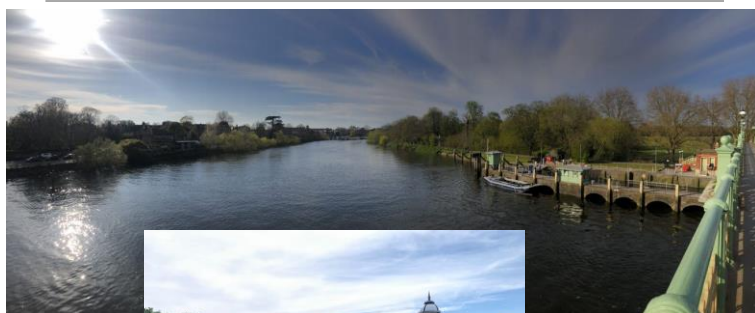
View Type:

Prospect

Description of View

Long view from Richmond Lock and Weir (Grade II*); encompassing:

- a) (north) along the River Thames towards Isleworth Ait including winter view into the Old Deer Park and towards the King's Observatory and Kew gardens; and,
- b) (south) along towards the Star and Garter and Richmond Hill; framed view under numerous bridges.



View: C6.1



GIS Mapping: C6.1

Viewing Place:

Riverscape view (wide)

Viewing Location:

Richmond Lock and Weir's pedestrian walkway

Viewing Co-ordinates:

E: n/a

N: n/a

Reference Policy:

Adopted Local Plan landmarks – Richmond Lock, Kew Observatory, Star and Garter
Urban Design Study

New view (proposed)

Visual Management Guidance

Foreground:

Richmond Lock and Weir: Victorian cast iron metal work, industrial and decorative; elevated view over the river

Middle ground:

River Thames

Background:

The River Thames (bend in the river eventually creates a landscape closure to view); Richmond Hill to the south

Character Area Name:

St Margarets Residential

View Name and Reference:

St Margarets Riverside

(C6.2)

View Type:

Prospect

Description of View

Sequential views from multiple locations along Ranelagh Drive in St Margarets along the River Thames and towards Twickenham Bridge. The wooded boundary to the Old Deer Park allows filtered views through to the open space beyond.



View: C6.2



GIS Mapping: C6.2

Viewing Place:

Park and riverscape view (wide)

Viewing Location:

Ranelagh Drive and surrounding riverside paths

Viewing Co-ordinates:

E: n/a

N: n/a

Reference Policy:

New view (proposed)

Urban Design Study

Adopted Local Plan landmarks – Twickenham Bridge, Richmond Lock

Visual Management Guidance

Foreground:

Ranelagh Drive and surrounding riverside paths

Middle ground:

Richmond Lock and River Thames

Background:

Old Deer Park

Character Area Name:

St Margarets Residential

View Name and Reference:

View of the Great Pagoda, St Margarets

(C6.3)

View Type:

Linear

Description of View

View from Twickenham Bridge, St Margarets towards the Great Pagoda in the Royal Botanical Gardens Kew. Long-distance view across open parklands, sport buildings and facilities with mature trees against skyline within the Royal Botanical Gardens Kew.



View: C6.3



GIS Mapping: C6.3

Viewing Place:

Directional/ Point view (specific)

Viewing Location:

Twickenham Bridge

Viewing Co-ordinates:

E: tbc

N: tbc

Reference Policy:

Adopted Local Plan

Urban Design Study View 4

Adopted Local Plan landmark – Great Pagoda

Visual Management Guidance

Foreground:

Twickenham Bridge (Old Deer Park border)

Middle ground:

Old Deer Park sport buildings and Richmond athletic grounds

Background:

Mature trees against skyline within the Royal Botanical Gardens Kew

Character Area Name:

Kew Gardens and Riverside

View Name and Reference:

King's Observatory, Old Deer Park

(G1.1)

View Type:

Linear

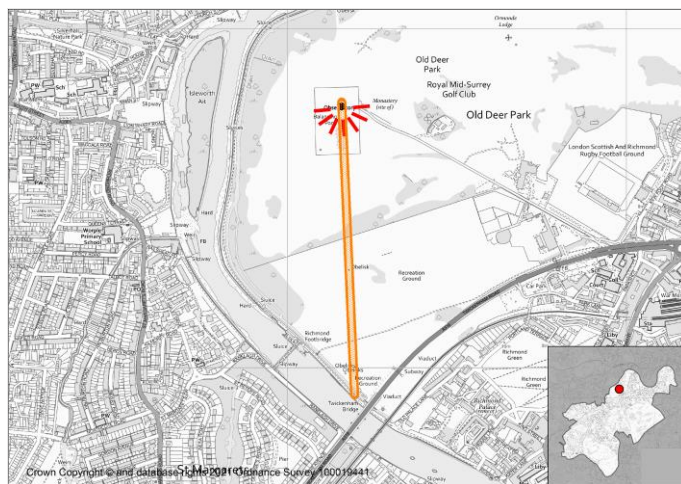
Description of View

View from the King's Observatory, 1769 (Grade I) through a retained gap in the mature tree planting along the Meridian Line towards the stone obelisks. The three obelisks which stand in the Old Deer Park are meridian marks set up for the purpose of adjusting the transit instruments in the Observatory, one pillar corresponding to the east wing of the building, one to the west wing and the solitary obelisk, along the towing path towards Brentford, indicating the true north point of the Observatory.

Additional meridian line marks can be found on the Thames Pathway: (south) near Twickenham Bridge; and, (north) near Syon Park Pavilion (Grade I).



View: G1.1



GIS Mapping: G1.1

Viewing Place:

Directional/ Point view (specific)

Viewing Location:

King's Observatory

Viewing Co-ordinates:

E: tbc

N: tbc

Reference Policy:

Adopted Local Plan

Urban Design Study: vista 13

Adopted Local Plan landmark – Kew Observatory

Registered Parks and Gardens: Old Deer Park incorporated as part of Royal Botanic Gardens Kew Park and Garden (Grade I)

Visual Management Guidance

Foreground:

Terrace to the building; landscaped fairways and pond of the Royal Mid-Surrey Golf Club

Middle ground:

Old Deer Park

Background:

(South) Twickenham Bridge

(North) River Thames

Character Area Name:

Kew Gardens and Riverside

View Name and Reference:

King's Observatory towards Kew Gardens

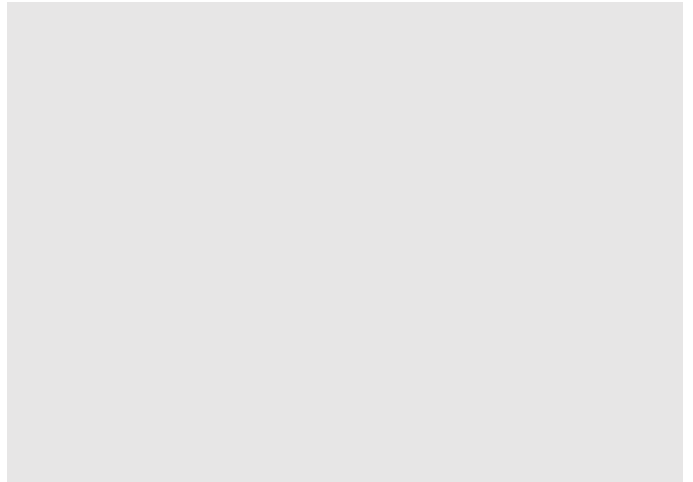
(G1.2)

View Type:

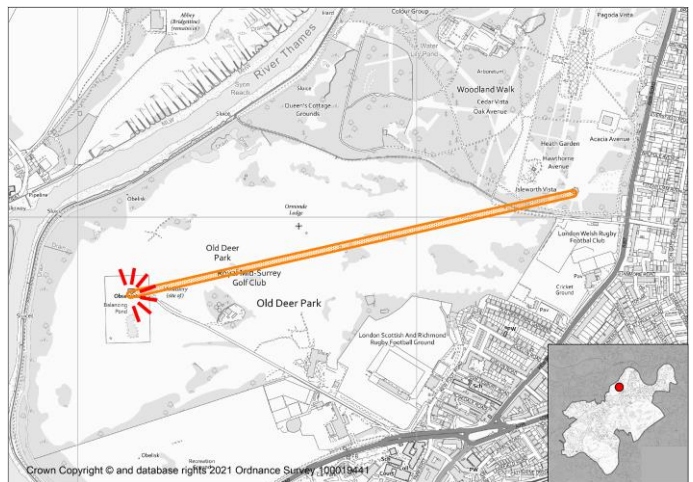
Linear

Description of View

View from the King's Observatory across the surrounding landscape (Royal Mid-Surrey Golf Club fairways and tree belts) towards the Great Pagoda which rises above the surrounding trees in Kew Gardens. Both the King's Observatory (1769) and the Great Pagoda (1762) were designed by Sir William Chambers for King George III.



View: G1.2 - photo to follow (when access attainable)



GIS Mapping: G1.2

Viewing Place:

Directional/ Point view (specific)

Viewing Location:

Terrace to the King's Observatory

Viewing Co-ordinates:

E: tbc

N: tbc

Reference Policy:

Adopted Local Plan

Urban design Study: vista 12

Adopted Local Plan landmark – Kew Observatory

Royal Botanic Gardens Kew Management Plan (2020-2025)

Visual Management Guidance

Foreground:

Terrace to the King's Observatory

Middle ground:

Landscaped fairways of the Royal Mid-Surrey Golf Club

Background:

Royal Botanic Gardens, Kew

Character Area Name:

Kew Gardens and Riverside

View Name and Reference:

King's Observatory towards Richmond Town Centre

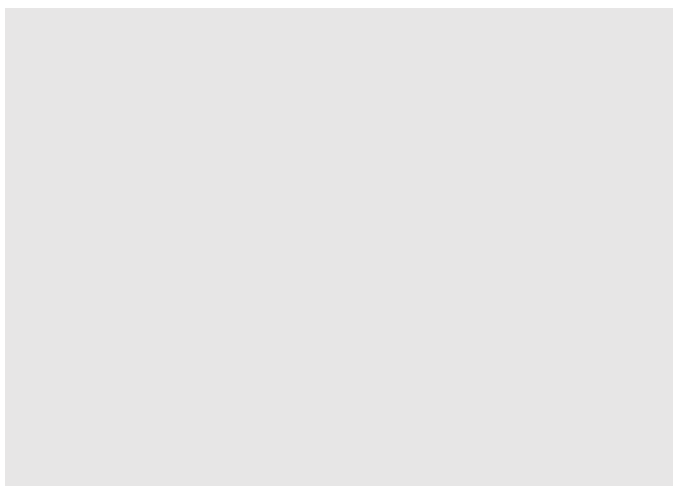
(G1.3)

View Type:

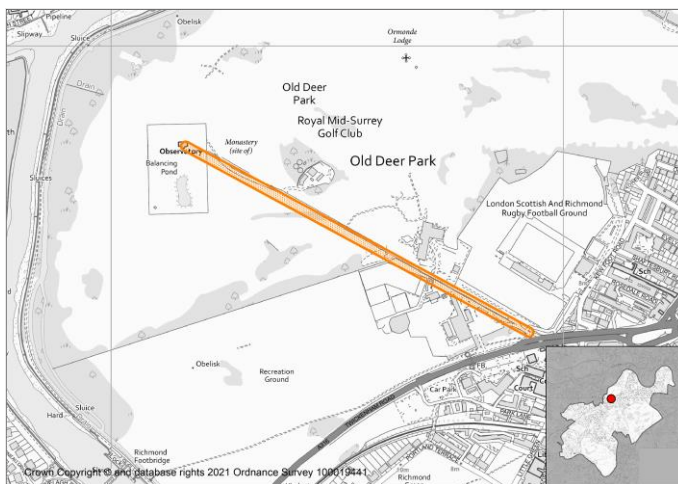
Linear

Description of View

Partially structured view from the King's Observatory towards Richmond Town Centre along the Royal Mid-Surrey Golf Course's approach road (up to Twickenham Road (A316)). View partially structured with avenue of trees and hedge planting; breaks in planting allow view over golf course fairways and sport grounds.



View: G1.3 - photo to follow (when access attainable)



GIS Mapping: G1.3

Viewing Place:

Directional/ Point view (specific)

Viewing Location:

Terrace to the King's Observatory

Viewing Co-ordinates:

E: tbc

N: tbc

Reference Policy:

Adopted Local Plan landmark – Kew Observatory

New view (proposed)

Visual Management Guidance

Foreground:

Terrace to the King's Observatory

Middle ground:

Landscaped fairways of the Royal Mid-Surrey Golf Club

Background:

Richmond Town Centre

Character Area Name:

Kew Gardens and Riverside

View Name and Reference:

Old Deer Park riverside

(G1.11)

View Type:

Prospect

Description of View

Views along the River Thames and across the Old Deer Park from the Thames Path/Capital Ring path between Twickenham Bridge and Richmond Lock Bridge. Views encompass the following:

- A view marked by paving and an obelisk on the footpath along the Meridian line on the Capital Ring riverside path near Twickenham Bridge, towards the King's Observatory. Two interpretation panels on the towpath interpret the Meridian for passers-by.
- Open views from footpath as the banks are close mown lawn.
- Views across Old Deer Park through gaps in the boundary trees across the ditch.
- Views ahead along the towpath become more wild as the path becomes more wooded in character further north.



View: G1.11



GIS Mapping: G1.11

Viewing Place:

Riverscape view (wide)

Viewing Location:

River Thames Pathway

Viewing Co-ordinates:

E: n/a

N: n/a

Reference Policy:

Urban Design Study

Adopted Local Plan landmarks – Twickenham Bridge, Richmond Lock, Kew Observatory

New view (proposed)

Visual Management Guidance

Foreground:

River Thames Pathway

Middle ground:

River Thames

Background:

Old Deer Park