



Local Plan Publication Consultation

From 9 June 2023 to 24 July 2023

RESPONSE FORM

The Council is inviting comments on the Publication version of the Local Plan.

The Local Plan sets out a 15-year strategic vision, objectives and the spatial strategy. The draft Plan includes place-based strategies covering the whole borough, along with accompanying site allocations, as well as the thematic planning policies that will guide future development in the borough. It will inform how growth will be accommodated across the borough. The draft Plan seeks to address future challenges including climate change, health, affordability and liveability.

This consultation is the final opportunity to comment on the Local Plan before it is submitted to the Secretary of State for independent 'examination in public'. At this stage in the plan-making process, in accordance with the national guidance, consultation responses should focus on whether the Local Plan has been developed in compliance with the relevant legal and procedural requirements, including the duty to cooperate, and with the 'soundness' of the Plan. Further detail on these concepts is provided in the accompanying guidance notes available on the website (via the link below).

How to respond

Please read the consultation documents and other background information made available on the Local Plan website: www.richmond.gov.uk/draft_local_plan_publication_version

You can respond by completing this form, either electronically using Word or as a print out, and sending it to the Council by:

- Email to LocalPlan@richmond.gov.uk
- Post a hard copy of the form to Spatial Planning and Design, LB Richmond upon Thames, Civic Centre, 44 York Street, Twickenham, TW1 3BZ.

Alternatively, you can make comments on the draft Local Plan **online via our Consultation Portal**, which is accessible at the website listed above.

All responses must be received by 11:59pm on Monday 24 July 2023. The consultation is open to everyone; however please note that responses will not be treated as confidential and those submitted anonymously will not be accepted.

This form has two parts:

- Part A – Personal details and about you
- Part B – Your detailed response(s).

Part A: Personal Details		
	1. Personal Details *	2. Agent's Details (if applicable)
Title	Dr	
First name	Peter	
Last name	Thompson	
Job title (where relevant)	Chief Executive Officer	
Organisation (where relevant)	National Physical Laboratory (NPL	
Address	████████████████████	
Postcode	████████	
Telephone	██████████	
E-mail address	peter.thompson@npl.co.uk	

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

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.

If you submit comments, the consultation responses and your personal data will be passed to the Planning Inspectorate and a Programme Officer. The Programme Officer manages the procedural and administrative aspects of the examination. The Programme Officer will contact you using the personal information you have provided if you have indicated in the response form your wish to engage in the Examination.

Part B: Your Response

3. To which part(s) 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	
Publication Local Plan (including changes to the Policies Map designations)	<input checked="" type="checkbox"/>	Page number(s)	
		Paragraph number(s)	
		Policy no./name	11, 17, 21, 22, 25, 26 27, 53
		Place-based strategy	
		Site Allocation(s) no./ name	
		Maps	
		Tables	
Sustainability Appraisal Report	<input type="checkbox"/>	Page number(s)	
		Paragraph number(s)	
Other (for example an omission or alternative approach)	<input type="checkbox"/>		

4. Do you consider the Local Plan is:

4.1 Legally compliant	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
4.2 Sound	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
4.3 Complies with the Duty to Co-operate	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>

Further information on these terms is included within the accompanying guidance note, which can be found on the website at www.richmond.gov.uk/draft_local_plan_publication_version

If you have entered 'No' to 4.2, please continue with Q5. Otherwise, please go to Q6.

5. Do you consider the Local Plan is unsound because it is not:

5.1 Positively Prepared	<input type="checkbox"/>
5.2 Justified	<input type="checkbox"/>
5.3 Effective	<input type="checkbox"/>
5.4 Consistent with national policy	<input type="checkbox"/>

6. Please give details of why you consider the Local Plan is or is not legally compliant, unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to provide comments in support of the legal compliance and/or soundness of the Local Plan, or its compliance with the duty to co-operate, please use this box to set out your comments.

Please note your response should provide succinctly all the information, evidence and supporting information necessary to support / justify the response. After this stage, further submission will only be at the request of the Inspector, based on the matters and issues they identify for examination.

Please continue on a separate sheet / expand box if necessary.

7. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, when considering any legal compliance or soundness matter you have identified at 6 above.

Please note that non-compliance with the duty to co-operate is incapable of modification at examination.

You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please note your response should provide succinctly all the information, evidence and supporting information necessary to support / justify the suggested change. After this stage, further submission will only be at the request of the Inspector, based on the matters and issues they identify for examination.

Please continue on a separate sheet / expand box if necessary.

8. Do you consider it necessary to participate in examination hearing session(s)? (Please tick box as appropriate)

No, I do not wish to participate
In hearing session(s)



Yes, I wish to participate
In hearing session(s)



Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

9. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Please continue on a separate sheet / expand box if necessary.

10. If you are not on our consultation database and you respond to this consultation, your details will be added to the database. This allows us to contact you with updates on the progression of the Local Plan and other planning policy documents.

If you do not wish to be added to our database or you would like your details to be removed, then please tick this box.



Signature: P. Thompson

For electronic responses a typed signature is acceptable.

Date: 24/7/23

Response to consultation on the Draft Richmond Local Plan National Physical Laboratory (NPL), Teddington

Thank you for the opportunity to respond to the Draft Local plan for Richmond. I am writing on behalf of the National Physical Laboratory (NPL), and our people.

As a science and engineering national laboratory, which has been based in Teddington since 1900 there are two areas we would like to issue our contribution under:

1. A response to the plan in terms of our people, our site and facilities and how they could be used for local benefit
2. A response to the plan in terms of the scientific input we could provide

The **overall vision for Teddington**, where our main site is located, is incredibly important to us. Being in a town which continues to provide “a community for residents, visitors and business which enjoys links to open spaces, the historic Royal Parks and the River Thames” is something that makes our organisation stand out.

As an organisation with 1000+ employees we are keen to work alongside Richmond Council to ensure we can continue to recruit and retain employees from both inside and outside the borough, while positively impacting in other areas of the plan. One of the challenges of being in Southwest London, however, is the high cost of housing. The inclusion of section 19 therefore is welcomed. Specifically - **Affordable housing (Policy 11), Supporting our centres and promoting culture (Policy 17) and protecting the local economy (Policy 21) and Promoting jobs and our local economy (Policy 22)** speak directly to this and supports our ability to bring employees into the borough, who in turn contribute to the local economy through the regular use of the high street and its many businesses.

It would be helpful to see more about the travel plans within the borough and for those who commute to our site. While Teddington is accessible to London via the main line station, many of our employees travel from the Southeast/West and find our location difficult to access via public transport. With house prices and rent so high in Teddington and the Borough, commuting long distances by car is often the only option. Opening Teddington up to more main line stations through increased public transport options would support people commuting and help with the upcoming ULEZ restrictions, which may lead to some employees simply being unable to afford to work for us anymore.

Policy 25. Affordable, flexible and managed workspace is an area where NPL can provide input for local benefit, using our international science community relationships. “Support small scale scientific, innovation and research space with a provision of incubator units and laboratories. While the borough accommodates a number of large universities and research institutions, there is no complementary local offer for smaller firms operating in the same sector. The creation of innovation hubs and R&D incubators can offer opportunities for co-location”. This could provide more opportunity for local collaboration and the possibility of co-location of facilities which would benefit all parties. NPL believes strongly in supporting entrepreneurs, start-ups and SMEs, our current measurement for Business programme is testament to this. We would welcome the opportunity to discuss how the capabilities of our site in Teddington could support scientific innovation more widely in the area and would be keen to offer our expertise to discuss the council’s existing plans and strategies to attract investment into the area.

The importance to NPL of **Policy 21 Increasing biodiversity and the quality of our green and blue spaces, and greening the borough** is demonstrated through our ESG Directorate's work on our direct Environment including the ongoing maintenance of our own green spaces, Bushy House gardens and initiatives such as 'no mow May'. We remain committed to this and hear how important it is to our employees. We would like to hear more about the council plans in this area and how we may contribute further.

We are also pleased to see a commitment to the digital infrastructure in **Policy 27. Telecommunications and digital infrastructure.**

It is well reported that NPL undertakes research and programmes of work into air quality as well as greenhouse gas emissions measurement <https://www.npl.co.uk/greenhouse-gas-emissions-measurement-modelling>. **Policy 53** with a focus on air quality for the borough is an area of work that NPL could input into to ensure the borough can achieve its targets.

Likewise, for **Policy 26 Implementation, Delivery and Monitoring section 26.5** "Through responding to the climate emergency and taking action, infrastructure will be adapted to become more climate resilient to cope with drought and flooding, along with investment to build a low carbon society, particularly for energy, waste and water. There will be increasing use of low and zero carbon heat sources and decarbonisation of existing heat networks" NPL can also provide expertise and guidance to the council to ensure the borough meets the target of net zero carbon by 2043.

I'd like to close this response with thanks to the Council for recognising NPL as a significant asset and one of the borough's nationally important scientific institutions. We are proud members of the community in Teddington and relish the opportunities available to us to engage with local businesses, schools, neighbours and the wider community to ensure they too are proud of the work we do. We are delighted that so many of those who apply for, and attend, our work experience programme as well as undertake apprenticeships with us are from the local area. We strive to provide the best possible opportunities for young people to enter careers in science, engineering and technology and hope to welcome many more to the organisation during the period of this plan.