

From: Jon Rowles [REDACTED]
Sent: 24 July 2023 19:37
To: Richmond Local Plan
Subject: Regulation 19 consultation response

Dear Sir or Madam

Whilst I support some of the measures in the draft plan, particularly protecting most of the Green Belt and Metropolitan Open Land and designating more areas as SINCs, I feel there is more work to be done before the plan can be adopted.

My main concerns are

- The council has not followed the Statement of Community Involvement. The council created an easy-to-digest summary consultation document for the initial direction of travel stage, but not for the Regulation 18 or 19 consultations. There were around three webcasts explaining the process during the direction of travel stage, but only one online workshop about the limited topic, the future of our high streets (though duplicated for each town) later on, the council carried out outreach work for school children but does not appear to have done so for other hard-to-reach groups such as ethnic minorities or LGBT+. Therefore, I feel there needs to be another round of consultation with workshops on a range of issues and an easy-to-read summary along with outreach work with minority groups.
- Some of the reports prepared for the evidence base were added very late in the Regulation 19 Consultation and the council has not made people aware they can comment upon them. I feel there should be another round of consultation and the council should specifically ask for comments on these documents.
- The online policies map only went live in the last two weeks of the Regulation 19 consultation and even then, it doesn't work well and stops working if you try and apply multiple policies at once.
- The council cannot meet its objectively assessed need for office and industrial floorspace. Whilst a reasonable policy response is to strongly protect existing land, I feel they should have also used the duty to cooperate mechanism to see if Hounslow, Kingston Upon Thames or Wandsworth could meet some of this unmet demand and see how they can improve transport links any capacity they are able to supply.
- It is highly disappointing that the council is not adopting the standard definition of twenty-minute neighbourhoods. It also needs to take into consideration the needs of the less physically mobile and ensure that disabled people and the elderly are not unjustly disadvantaged.
- The sustainability report states there is unlikely to be an impact on Richmond Park SAC, however, the Royal Parks Management Plan states that some areas of the park are under recreational stress. The report does not look at the cumulative impact of the London Plan Opportunity Area adjacent to the park in Kingston Upon Thames which will see thousands of extra homes built. I feel the council needs to look again at the impact on Richmond Park SAC and seek to divert some recreational use to other sites. The management Plan also supports
- The Opportunity Areas in Hounslow and Kingston Upon Thames will result in more traffic in Richmond. In the Hounslow Transport Local Implementation Plan it identifies the need to rebuild or widen several railway bridges in Whitton to accommodate the growth in cyclists; however, this identified need has not worked its way into Richmond's Transport LIP. Turning to Kingston, TFL commissioned ARUP to undertake a transport analysis which found there would be a significant increase in traffic which would need to be mitigated with better cycling links and possible local road charging.

- The Richmond Local Infrastructure Delivery Plan looks like a draft document in places with a large number of estimated costs missing. This could result in schemes going through planning without the council having the ability to collect contributions towards infrastructure needed to support them. Such as the proposed foot and cycle bridge across the river between Ham and Twickenham.
- The Open Space evidence report does not conform with the London Plan Guidance, All London Green Grid, and has its own classification system that is very hard to understand. For instance, Murray Park which is a large traditional park, with large playgrounds, a village hall etc is classified as an amenity green space as the council no longer marks out a football pitch in winter months (despite the local football team Whitton Wonders being desperate for more playing pitches). The version placed on the website has omitted the quality scores of each park and the companion guidance needed to fully interpret the report has not been published.
- Green Grid Area GGa10 River Colne and Crane policies are not reflected fully in the policies in the Richmond Local Plan, and the council should be looking at how it can support the London Plan's ambition to create a new metropolitan scale park (policy 5.162). Several of the site allocations, Harlequins / Kneller Hall / Sainsbury St Clares / Twickenham Stadium / are next to the policy area and should reference them.
- Richmond Council has a very low level of affordable home delivery, one of the lowest in London. The amount delivered by development is even lower than it first appears as much of what is built is receiving grant aid from the council. I feel the inspector needs to look very closely to see if all the extra design requirements that Richmond Council is adding on top of the NPPF will result in even less affordable housing being delivered.
- The Plan seeks to diverge from the London Plan in using the viability method for assessing the amount of affordable housing a site can deliver. This is likely to result in a much smaller amount being built as RICS surveyors will value land differently in London depending on which method the council uses to assess the viability and thus keeping with the current system will result in higher land prices being used in the calculations and correspondingly fewer affordable houses will be delivered.
- The BNP Paribas viability assessment states there will be a 5% cost uplift in construction costs and a 15% increase in operational and embodied carbon due to the council going further than the NPPF on zero carbon (page 26). I have concerns that the extra requirements for new homes could just divert new constructions to other areas (or even onto the green belt) resulting in the urgent need for extra housing locally not being met. Or the council increases the amount of grant aid to ensure that affordable housing is not sacrificed to meet the new net zero goals?
- Monitoring: currently the Housing Committee receives an annual report of housing built, however, it is of very limited value because they are not in charge of the planning function and thus corrective actions cannot be put in place easily if the targets are not being met. Over the past five years, there appears to have been no real monitoring of the other policies in the plan and thus we are seeing a drift away from plan-led development in LBRuT. I believe the council needs to monitor all the main policies in the plan and this needs to be discussed annually by the Environment Committee.
- The current local plan had 'Village Plans' and 'Village Planning SPD's' for each village using an urban village/neighbourhood planning approach, but the incoming Liberal Democrat administration decided to discontinue the 'village plans' in 2018 and deleted them from the council website so the main overarching strategy in the current local plan stopped functioning. I feel the council at least needs to amend the place strategy and ensure their places/towns are not too big, and they should each have statements prepared to show local priorities. However, I feel the council should encourage each area to have a full neighbourhood plan so that decision-making is brought as close to local communities as possible.
- Central Twickenham does not have any 'Village Planning SPD' as it had an area action plan instead. However, the council plans to retire the action plan when the new plan is adopted and this

will result in central Twickenham having fewer protections for its urban environment than the rest of the borough. I feel the council needs to commit to commissioning a new village planning SPD for central Twickenham or a replacement Area Action Plan.

- The 2023 Local Government Association Corporate Peer Challenge Report found that the council was focusing too much on Richmond and Twickenham and was failing to understand or plan for the needs of other less vocal communities and need to shape more localised plans. It also mentioned that concerns about the environment are overshadowing the needs of other groups

<https://www.local.gov.uk/our-support/council-assurance-and-peer-support/peer-challenges-we-offer/corporate-peer-challenge-82>

- Richmond has set a Biodiversity Net Gain of 20% whilst neighbouring Kingston Upon Thames has set their target at 30%. Both boroughs are very similar in terms of the built environment, and I feel the council needs to review why both authorities have come up with such a different target.

Yours faithful

Jon Rowles

