



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 | Ms | |
| First name | Rosemary | |
| Last name | McGlashon | |
| Job title (where relevant) | | |
| Organisation (where relevant) | The Teddington Society | |
| 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.

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) | 47, 48, 262, 263, 413 |
| | | Paragraph number(s) | Section 7 |
| | | Policy no./name | 45 |
| | | Place-based strategy | Place-based Strategy for Teddington & Hampton Wick |
| | | Site Allocation(s) no./ name | |
| | | Maps | p26, Appendix 3 Teddington p413 |
| | | 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 type="checkbox"/> | No <input type="checkbox"/> |
| 4.2 Sound | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| 4.3 Complies with the Duty to Co-operate | Yes <input 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 checked="" 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.

The draft local plan says (p. 47) that “The Council works through the Teddington Society ... to make Teddington a great place to work and live.”, yet no account appears to have been taken of our earlier input to the draft plan nor has anyone from the Council discussed our input to the first draft with us.

This input is a re-iteration and expansion of our previous comments on a Mid-Rise Zone in Teddington (Section 7: Place-based Strategy for Teddington & Hampton Wick (p.48). Page numbers refer to the Publication Local Plan low resolution version.

We are very concerned that the area "along the railway line north of Teddington Station" (and we note from Policy 45 and Appendix 3 (p413) that this is on both sides of the railway and over the railway bridge) is being designated a Mid-Rise Zone (5-6 storeys). We believe that (as it is effectively right in the town centre) this is totally inappropriate and there should be no Mid-Rise or Tall-Building Zones in Teddington. We note that Page 26 shows that no other area in the borough has a mid-rise building zone right in the town centre.

We consider that designating this ‘Mid-Rise Zone’ will encourage the building of 5-6 storey buildings in that area as developers may assume that permission would be granted. This would also remove the public's ability to object to development on grounds of scale.

The Local Plan says that “the borough is characterised by primarily low to medium rise buildings which has produced very attractive townscapes and is important to the borough’s distinctive character.” We already have taller buildings in the centre of Teddington, such as the Travelodge, Harlequin House or the new Informer House. They are not part of an ‘attractive townscape’ and conflict with Teddington’s ‘distinctive character’ and further cut Teddington in half, visually separating one side of the railway from the other.

Page 48 (bullet point 3) proposes to “improve the sense of arrival at Teddington Station”, yet next to the station could be 5-6 story buildings instead of the low-level business park/industrial land now existing. The scale of the buildings in Station Road, in The Cedars, at Teddington Station and the Park Hotel should be respected and nothing should be built that is out of the scale or character of these locations. The current business park reinforces the character of the streets around the station in its scale and mass, which mid-rise buildings would not.

The areas near Teddington Station that are now industrial sites should remain as such to enable local employment. We support the designation of Teddington Business Park, Station Road as a Locally Significant Industrial Site (LSIS) (section 19.29, p262) and note that in section 19.34 (p263) the Local Plan says “The Council will protect employment uses within the identified key industrial land location”. It particularly mentions “car repair garages”. Halfords is sited in the Teddington Business Park (along with tens of other local employers). A Mid Rise Zone designation is not necessary to achieve this.

The designation of “Mid-Rise Zone” north of the station, with the possible loss of the industrial estate and other industrial land, contradicts other statements in the plan about the importance of industrial and office space. The following sections directly support retention of industrial land, section 4.19 (p23), Section 17.9 (p215), Policy 21 A.1 (p253), Sections 19.1 (p254), 19.2 (p254), 19.6 (p255), 19.35 (p264) and Policy 23 A (p257).

In summary, to protect the character of Teddington and to preserve the low-level Teddington Business Park and land

around the station from unsuitable development any reference to a Mid-Rise Zone at Teddington Station should be deleted from the Local Plan.

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.

To protect the character of Teddington and to preserve the low-level Teddington Business Park and land around the station from unsuitable development any reference to a Mid-Rise Zone at Teddington Station should be deleted from the Local Plan - see above for the full justification.

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:
For electronic responses a typed signature is acceptable.

Rosemary McGlashon
on behalf of The Teddington
Society

Date:

23/07/23