

Local Plan Team  
London Borough of Richmond upon Thames  
44 York Street  
Twickenham  
TW1 3BZ

24 July 2023

Dear Local Plan Team

**Richmond Local Plan 'The best for our borough' Draft for consultation  
(Regulation 19)**

On behalf of our client, the owner of the Arlington Works site in St Margarets (see plan attached), we write in response to the consultation on the new draft Local Plan.


Our client submitted representations to the Regulation 18 Consultation. We have reviewed the Regulation 19 Richmond upon Thames (LBRuT) Local Plan 'The best for our borough' document and have set out our comments and suggested changes below, required in order to make the Plan sound.

We are disappointed that our previous representations have not been addressed in the Regulation 19 version of the Plan but we remain keen to work with officers and local community to discuss how this site can best contribute towards meeting the needs of the area and the wider Borough.

The Future Use of the Site

Part of the Arlington Works site is proposed to be identified as an 'existing safeguarded waste site' in the Regulation 19 version of the Local Plan. However, this waste use ceased more than 5 years ago having been cleared in 2018 following closure of the associated waste oil transfer and treatment business. The environmental permit has been accepted for surrender by the Environment Agency (EA), following removal of the site infrastructure. Therefore, in reality any future use of this part of the site for a waste use would require planning permission plus gaining an environmental permit from the EA.

There is no reasonable prospect of an application coming forward for a waste use on the site, given its size and location within a residential area. Plus, it is unlikely that the EA would ever grant a new permit for a waste operation at the location without a building being erected as per its most recent guidance relating to appropriate measures for pollution control. The remainder of the site has no allocation and yet is clearly in need of development (see photos attached).



As such, and in accordance with para 122 of the NPPF, the whole Arlington Works site should be allocated for mixed use development to meet identified needs for employment space and housing. There is an acknowledged shortage of both in this part of London, particularly for affordable housing.

The Richmond Local Plan is the most appropriate place to release the site. We understand that a review of the WLWP which was adopted in 2015, is still to formally commence and so there is no prospect of a review of the identification of the site to take place within that process for the short/medium term. We note that Policy of the London Plan, adopted in 2021 states:

*"9.9.2 Any **proposed release of current waste sites** or those identified for future waste management capacity should be part of a plan-led process, rather than done on an ad-hoc basis."*

As production of the RuT Local Plan is the only plan production process for future land use within the Borough that is 'live', clearly it is the right place for release of a waste site to be considered, being part of a "plan-led process" as stipulated by the London Plan.

As currently drafted, Policy 7 (B) of the draft Plan seeks to safeguard the Borough's waste sites [due to their initial identification in the WLWP, and ongoing confirmation via the AMR] stating that proposals affecting these sites, as well as proposals for new or additional waste management facilities, will be assessed against the policies of the West London Waste Plan and the London Plan.

The West London Waste Plan was adopted in 2015 and therefore this Plan is no longer underpinned by a relevant and up to date evidence as required in paragraph 31 of the NPPF. It should also be noted that it was produced against the backdrop of the previous version of the London Plan adopted in 2016 (FALP) which has now been superseded by that adopted in 2021. The need to ensure the WLWP remains aligned with the changing versions of the London Plan was explicitly recognised in the WLWP in the following terms:

### **7.3 Review of the West London Waste Plan**

*7.3.1 The Plan will be reviewed following adoption of the Further Alterations to the London Plan (FALP) and any other changes to the policies of the London Plan and at least every five years. In part this is to ensure that the Plan is still meeting the apportionment requirements of the London Plan (2011) and to take into account any changes to waste management capacity and the need for the identified sites.*

This clause was added to satisfy the concerns of the Examination Inspector around the currency of the Plan in light of the imminent changes to the London Plan to be brought into effect by the FALP. It was intended that the continued need to identify certain sites be revisited sooner rather than later. However, eight years and a further version of the London Plan later, a formal review is still to commence.

In these circumstances, the LBRuT Local Plan must be the appropriate place to

release the site for suitable and more sustainable uses.

There is no justification or need served by the land at Arlington Works continuing to be identified as a safeguarded waste site at all. Not only does the site make no contribution to the waste management provision in London (and hasn't for many years) and will continue in this way, by continuing to identify it as such it frustrates the appropriate development of the wider site that can make a valuable contribution to the Borough's needs in terms of jobs and homes.

As a sustainable and accessible brownfield site close to St Margaret's local centre and train station, with a PTAL rating of 3, the Arlington Works site offers a regeneration opportunity with excellent potential for contributing to the delivery of much needed housing as well as providing upgraded employment floorspace and heritage benefits. A suitable allocation can unlock significant beneficial development and investment which will be lost should the site continue to be safeguarded as a waste site.

Unless the safeguarded site listing is revisited, as currently drafted, the Plan will continue to safeguard a disused and unsustainable waste site. This would be in direct conflict with Policy GG2 of the London Plan relating to making the best use of land. The Arlington Works site should therefore be re-allocated through this Local Plan review process.

We also note that the Council's previous position on the de-designation of the Arlington Works site as an existing waste site was set out in its response to the Inspector examining the previous Plan in 2017 reproduced below:

*"The WLWP has been adopted in 2015 and it does not form part of this Local Plan Review. It should be noted that Richmond Council would be unable to make changes to the WLWP as part of this Local Plan as the WLWP has been produced and adopted in co-operation with other boroughs, including the OPDC, **and the designation of Arlington Waste Works as an existing waste management site can only be considered as part of a review into the WLWP, together with the other LPAs.** Therefore, this Local Plan does not / cannot change the status of this safeguarded waste site, and it is not proposed that this site is designated as anything else within the Plan." (emphasis added)*

This statement is erroneous being contrary to the West London Waste Plan safeguarding policy which includes a footnote that states:

*"... The latest list of existing waste management sites will be found in Authority Monitoring Reports."*

and we note that the following clause was introduced into Paragraph 6.5.6 of the current Local Plan at the behest of the Inspector:

*[new para] "The existing waste management sites as set out in Appendix 2 of the West London Waste Plan were identified at a snapshot in time. **This***

***list can be revised.*** *New waste sites, permissions and licences may be granted by the Council or Environment Agency. The Council carries out regular monitoring of existing waste sites, the results of which, including maps of operational sites, are published as part of the Authority's Monitoring Report." (emphasis added)*

This means the Arlington Works site may be released from identification as a safeguarded site in the WLWP through release of an up-to-date AMR by the Council. We note that the Council's previous AMR relating to this matter was released at a similar time in the previous Plan production process. This actually confirmed release of a number of waste sites previously identified as safeguarded. We also note that other LPAs party to the WLWP have also released land allocated for waste use in the WLWP since its adoption.

Finally on this matter we note that Proposed Allocation 12 for The Stoop is immediately adjacent to an identified safeguarded waste site within the Borough, Twickenham Depot, that is also allocated to assist in meeting the London Plan apportionments for the combined West London Boroughs, so should be afforded a high level of protection under safeguarding policy.

#### Policy 10 New Housing (Strategic Policy)

There is a pressing need for new housing within the Borough. Rising housing targets nationally and in London has put pressure on local authorities to deliver new housing.

There is a pressing need for new homes, particularly affordable homes, both within the borough of Richmond and across the wider housing market area of London. The London-wide Strategic Housing Market Assessment has identified a need for 66,000 additional homes per year and this is stated in paragraph 4.1.1. in the London Plan.

The Regulation 19 version of the plan sets out that the Borough's ten-year housing target is 4,110 homes and that the Council will need to exceed the minimum dwelling requirement. This equates to a **minimum** of 411 dwellings per annum (dpa).

The council published its most recent Authority Monitoring Report (AMR) – Housing in March 2023. This set out that that only 164 residential units were delivered in 2021/2022, representing a shortfall of 247 homes (- 40%) against the required 411 dpa which represented the lowest number of completed units in the Borough in over 10 years.

The council published its Local Housing Needs (LHN) Assessment in December 2021. The Assessment provides an analysis of the projected future housing need within the Borough and sets out that the actual housing need is 673 homes per annum as evidenced in paragraph 4.53. This represents an additional 262 dpa above the London Plan target.

The Council should increase its housing target to better align with the LHN figure.

This will ensure that the Plan is using the most up to date evidence and will confirm that the Council is committed to positive plan making.

#### Policy 1: Living Locally and the 20-minute neighbourhood

The Arlington Works site is within a short walk of the local centre of St Margarets and other local facilities such as parks, train and bus services. The Arlington Works site has the potential to positively contribute towards the 20-minute neighbourhood of St Margarets.

#### Appendix 2 Marketing Requirements

Table 28.1 in Appendix 2 states that a number of policies in the Local Plan require marketing evidence to be submitted for applications involving the loss of certain uses. The Plan's minimum marketing requirement for the loss of industrial land is two years. The requirement for a two-year marketing period is not a reasonable timeframe and is inconsistent with the London plan.

The supporting text to London Plan Policy E7 (paragraph 7.7.5) states the following:

*“Evidence to demonstrate ‘no reasonable prospect’ of Non-Designated Industrial Sites being used for industrial and related purposes should include:*

- ***evidence of vacancy and marketing with appropriate lease terms and at market rates suitable for the type, use and size (for at least 12 months”.***

12 months is a sufficient time period to establish whether there is a reasonable prospect of the site being occupied for the relevant employment use. Given that this period is considered acceptable in the London Plan, Table 28.1 in Appendix 2 should be amended to require a 12-month marketing period, in line with the London Plan. This will confirm that the Council is committed to positive and effective plan making.

#### **Our previous comments which still remain relevant**

The concerns and comments we previously raised in the Regulation 18 version of the plan have not been addressed. They are legitimate concerns and undermine the soundness of the emerging Local Plan. For ease, we re-state our concerns below.

#### 8 Place-based Strategy for Twickenham, Strawberry Hill & St Margarets

The map attached to the area profile is inaccurate as it does not differentiate between St Margarets Local Centre and St Margarets residential.

We do not understand or agree with the rationale used to select or discount sites for inclusion within site allocations within the area. The Arlington Works site could

support a mixed use (commercial and residential) regeneration scheme on a key site within the area, however it has been discounted. The Local Plan should provide a place based policy document to support development within the area and as such should consider and support the contribution that sites such as Arlington Works can play in regeneration.

It is entirely appropriate that the Arlington Works site should be allocated for mixed use development in the Local Plan. As it stands, the plan is unsound. We would like to work with officers to agree how this can be addressed and how consultation with local residents can assist.

We look forward to hearing from you.

Yours sincerely



Phil Villars

Director

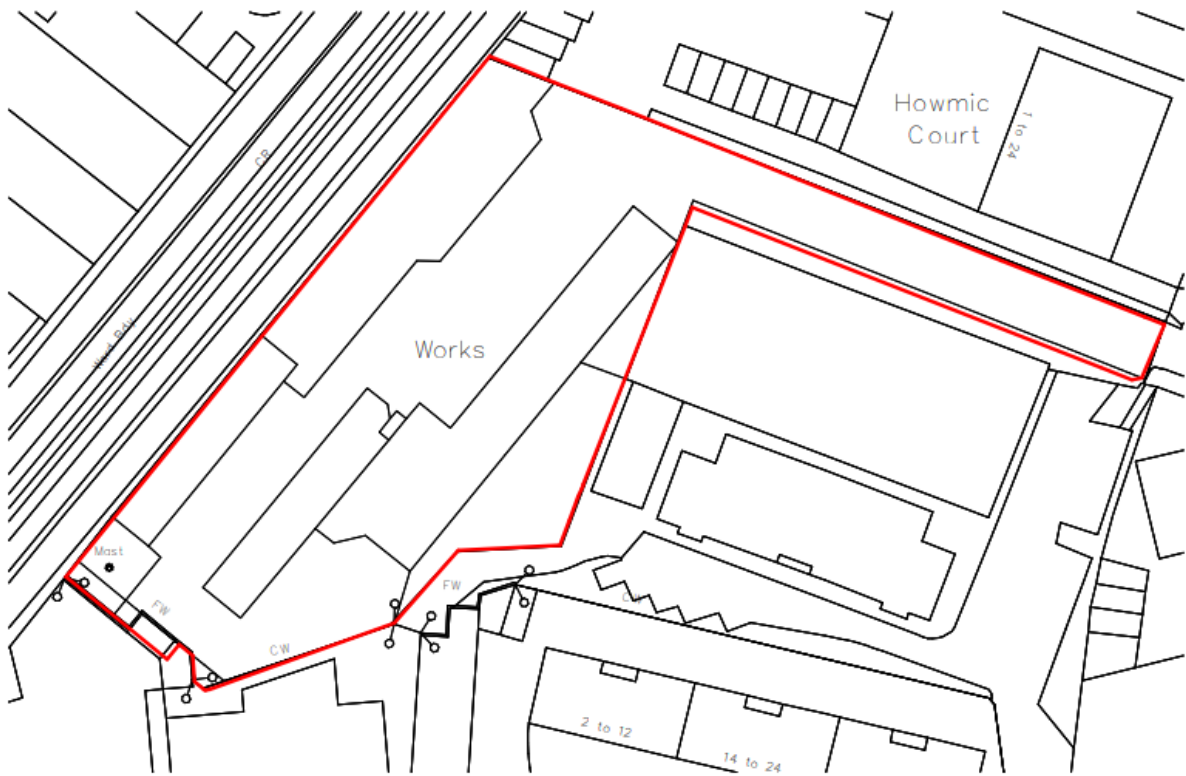
Attachments:

Annex 1 – Site Plan

Annex 2 – Site Photos (July 2023)

Annex 1. Site Location Plan

---



Annex 2. Site Photographs

---













