



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	Mr	Mr
First name	Mark	Paul
Last name	Lynch	Landsberg
Job title (where relevant)	Director of Venue	Director
Organisation (where relevant)	Rugby Football Union (RFU)	CBRE UK
Address	Rugby Football Union Rugby House Twickenham Stadium 200 Whitton Road Twickenham	CBRE Henrietta House Henrietta Place London
Postcode	TW2 7BA	W1G 0NB
Telephone	c/o agent	██████████
E-mail address	c/o agent	██████████████████

*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)	p. 75-78; p.243
		Paragraph number(s)	
		Policy no./name	Policy 35, Policy 1, Policy 18, Policy 26
		Place-based strategy	
		Site Allocation(s) no./ name	Site Allocation 13
		Maps	
		Tables	
Sustainability Appraisal Report	<input type="checkbox"/>	Page number(s)	
		Paragraph number(s)	
Other (for example an omission or alternative approach)	<input checked="" type="checkbox"/>	Open Land Review (2021); Metropolitan Open Land (MOL) Review Annex Report (detailed assessment) (2021).	

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 type="checkbox"/>	No <input checked="" 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 checked="" type="checkbox"/>

5.3 Effective	<input type="checkbox"/>
5.4 Consistent with national policy	<input checked="" 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.

We consider the continued designation of the eastern strip of MOL parcel no. 36 (Kneller Chase Bridge), which encroaches within Twickenham Stadium, is not justified. The continued designation is not based on a robust and credible evidence base, as it does not respond to conclusions and recommendations within the relevant evidence base document (Open Land Review 2021 and MOL Annex Report 2021).

Both the Regulation 18 and Regulation 19 Local Plan include the eastern strip of the parcel, which sits within the Twickenham Stadium site, within the Kneller Chase Bridge MOL (Parcel no. 36).

The Local Plan evidence base documents (Open Land Review 2021 and MOL Annex Report 2021) confirm this area meets none of the MOL policy criteria and it is recommended its status is considered further.

We are of the view its continued designation is not justified and that the Council's response to the RFU's Regulation 18 representations on this point within the Statement of Consultation (June 2023) is not satisfactory.

Please refer to the letter accompanying this form for full information and the relevant extract of the MOL Land Review 2021.

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.

According to the conclusions of the MOL Annex Report 2021 p.115-117 (Local Plan Evidence Base document), the eastern edge of Parcel 36 does not meet the MOL criteria.

We therefore propose the following modifications.

Current wording within Site Allocation 13 (p. 75-78):

“Part of the site, adjacent to the Duke of Northumberland River, is designated Metropolitan Open Land (MOL). The Open Land Review 2021 found that the MOL strip of land to the east of the river should be improved as it forms part of the valued green corridor at the Duke of Northumberland’s River to enhance provision for wildlife and access. Therefore, any development proposal is required to protect and, where possible, enhance, the Duke of Northumberland River, including access to it, and the associated MOL.”

Proposed wording within Site Allocation 13 (p.75-78):

“The Open Land Review 2021 found that the strip of land to the east of the Duke of Northumberland River should be improved as it forms part of the valued green corridor to enhance provision for wildlife and access. Therefore, any development proposal is required to protect and, where possible, enhance, the Duke of Northumberland River, including access to it.

The Open Land Review 2021 (MOL Annex Report 2021) also found that the hard standing associated with Twickenham Stadium meets none of the MOL criteria, and therefore this land has been removed from the designation. Notwithstanding, any development proposals for Twickenham Stadium would be required to meet Policy 35, and take into account possible impacts on the character, local distinctiveness and openness of the adjacent MOL”.

Associated with the above, we suggest that the text within Draft Policy 35 (p.243) is also updated. We propose that a fourth change to the Policies Map is added to the three already listed in the Regulation 19 Local Plan, to account for an updated boundary of Parcel 36 in line with the evidence base, as below.

“Proposed Changes to the Policies Map

A. Further to the recommendations in the Green Belt, MOL, LGS and OOLTI Review (2021), the following sites will have their MOL designation removed.

1. Carpark for Sainsburys, Uxbridge Road, Hampton (see Site Allocation 5)
2. Parcel 48 of the Review: Front Gardens Hampton Court Road (East) - The parcel is a very small linear section comprising front gardens to residential properties along Hampton Court Road.
3. Parcel 49 of the Review: Front Gardens Hampton Court Road (West) - The parcel is a very small linear section comprising front gardens to residential properties along Hampton Court Road.”
4. Eastern edge (hardstanding associated with Twickenham Stadium) within Parcel 36 of the Review: Kneller Chase Bridge – This portion of the parcel which is linear, does not meet any of the MOL criteria.”

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)	<input type="checkbox"/>	Yes , I wish to participate In hearing session(s)	<input checked="" type="checkbox"/>
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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.

In order to test the conclusion of not removing the relevant strip of land from the MOL designation

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:

Paul Landsberg

For electronic responses a typed signature is acceptable.

Date:

24.07.23