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24/07/2023

To whom it may concern,

**Richmond Local Plan – Consultation Response**

I write as a member of the Planning & Conservation Working Group of the London Historic Parks & Gardens Trust (trading as London Parks & Gardens; LPG). LPG is affiliated to The Gardens Trust (TGT, formerly the Garden History Society and the Association of Gardens Trusts), which is a statutory consultee in respect of planning proposals affecting sites included in the Historic England (English Heritage) Register of Parks and Gardens of Special Historic Interest.

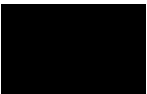
LPG is the county gardens trust for Greater London. LPG makes observations on behalf of TGT in respect of registered sites, and may also comment on planning matters affecting other parks, gardens and green open spaces, especially when included in the [LPG's Inventory of Historic Spaces](#) and/or when included in the Greater London Historic Environment Register (GLHER). The Trust has compiled a list of sites in each borough, including Richmond, [which can be accessed here](#).

The LPG inventory is compiled selectively with reference to criteria such as the preservation of historic landscapes and settings (both designed and natural), importance to local communities and the protection of wildlife and biodiversity.

Many local green and open spaces are not designated heritage assets and are often at risk if not identified in Local Plans. We ask local authorities to include these spaces in their Local Plans and related policies to encourage protection of these precious historic landscapes which add character and improve well-being for everyone. LPG hopes its Inventory is used as a resource to inform supplementary planning documentation in the future.

Please find enclosed our comments on the final draft of Richmond's Local Plan.

Martha Bailey



For and on behalf of the Planning & Conservation Working Group

cc. The Gardens Trust

## Appendix 1 – London Parks and Gardens Comments

### Policy 1

#### Living Locally and the 20-minute neighbourhood (Strategic Policy)

B. The 'living locally' concept will be achieved by:

1. giving people the ability to meet most of their daily needs, through a mixed pattern of land uses including food and necessities, within a 20-minute walk from home, with safe cycling and local public transport options;
2. facilitating access to quality public transport that connects people to jobs and other places they need to go to, especially improving inclusive access and overcoming barriers for people who experience reduced mobility;
3. promoting and enabling healthier lifestyles and active living by improving walking and cycling infrastructure to achieve the borough's target of 75% of trips being undertaken by walking, cycling and public transport;
4. offering a high-quality public realm and open spaces;
5. delivering new developments at densities that make local services and transport viable;
6. improving accessibility and connectivity of green infrastructure;
7. facilitating thriving local economies;
8. following the Mayor's Healthy Streets Approach to ensure walking and cycling are the natural choices for local journeys, and using the Healthy Streets Toolkit to assess new infrastructure schemes.

C. All development (except householder applications for alterations) should:

1. demonstrate how they will deliver improvements that support the 'living locally' concept;
2. be permeable by foot and cycle, with good connections and signage to local walking and cycling routes/networks as well as public transport;
3. demonstrate that future occupiers of the development are able to meet their shopping, work, recreational and cultural needs within a 20-minute walk or cycle and how the new development will contribute to sustaining the 'living locally' concept;
4. demonstrate that the proposals will not lead to any deterioration in the provision of, and access to, services to meet shopping, work, recreational and cultural needs for local communities;
5. demonstrate how a proposal will reduce the dominance of vehicles. Major developments of 10 or more residential units or non-residential development of 500sqm of floorspace or more
6. must demonstrate how the proposal will improve local walking and cycling routes, including accessibility to the existing network, in areas with lower levels of public transport accessibility or higher levels of health deprivation and disability.

**Commented [MB1]:** After point 2. please consider adding a further point; '3. protect and enhance existing open space in the borough.' This marries with the commitment to 'offering a high-quality public realm and open spaces' as set out in point 4. above.

## Policy 16

### Small Sites

- A. The Council will support the delivery of the small sites target of 234 new homes per annum in accordance with London Plan Policy H2.
- B. In accordance with the London Plan, intensification is encouraged on small sites with good public transport accessibility (PTAL 3-6) and on sites within 800m of a tube, rail station or Major or District town centre boundary (as defined in the London Plan). Outside of these locations, development will be considered provided no unacceptable impact(s) identified against other policies in this Plan.
- C. Proposals for small sites will need to have regard to the existing townscape character, as set out in the Urban Design Study, with proposals reflecting the building typology and demonstrating how they accord with the broad strategy for planning and management set out in the design guidance for each character area.
- D. The Council will support proposals for well-designed new homes on small sites (up to 0.25 hectares) to meet local needs, in accordance with environmental, transport, parking and other relevant policies, see Policy 15 'Infill and Backland Development'. Proposals on small sites are expected to: [...]
5. Result in no net loss of existing biodiversity or significant loss of open space or garden land.

**Commented [MB2]:** Please re-phrase this to read 'result in no net loss of existing biodiversity, open space or garden land. Where it can be demonstrated that loss of open space is unavoidable, this loss should be offset through the provision of open space elsewhere in the borough, preferably within the development site.'

## Policy 30

### Non-designated Heritage Assets

- A. The Council will seek to preserve, and where possible enhance, the significance, character and setting of non-designated heritage assets, including Buildings of Townscape Merit, memorials, particularly war memorials, locally listed historic parks and gardens and other local historic features. B. There will be a presumption against the demolition of Buildings of Townscape Merit.

**Commented [MB3]:** There is an easily accessible table of locally listed buildings available online however it is not clear where 'locally listed historic parks and gardens' have been collated. Please provide a clear signpost. Please note that LPG's inventory of historic open spaces in the borough of Richmond (see appendix on attached cover letter) may provide the basis for a local list if none has been compiled to date.

## Policy 34

### Green and Blue Infrastructure (Strategic Policy)

- A. Green and blue infrastructure is a network of multi-functional green spaces and green features, green space stepping-stone sites as well as rivers and other watercourses, ponds, floodplains and wetlands, which provides multiple benefits for people, nature and the economy, and which plays a significant role in both mitigating and adapting to climate change.
- B. To ensure all development proposals protect and appropriately enhance and restore green infrastructure, the following will be taken into account when assessing development proposals:
1. Protect and enhance the borough's blue and green infrastructure networks, in particular, but not exclusively, the sites designated as Green Belt, Metropolitan Open Land, Local Green Space, Other Open Land of Townscape Importance, other open spaces as well as areas designated for their biodiversity and nature conservation value.
  2. Protect and seek improvements to walking and cycling routes to and through the green infrastructure network, such as green spaces, and where opportunities arise create such routes, thereby promoting healthy lifestyles and active travel.
  3. Enhance the existing blue and green infrastructure network, including open spaces and green corridors, providing habitats for biodiversity to flourish and expand.
  4. Protect and enhance biodiversity within the green and blue infrastructure networks, particularly on sites designated for nature conservation interest, but also recognise the contribution that non-designated sites offer to increase biodiversity in the borough.
  5. Increase the provision of green and blue infrastructure in and around development sites through urban greening and other green and blue infrastructure features, ensuring they complement the surroundings and link into existing networks.
  6. Expect development to incorporate and maintain appropriate elements of green infrastructure which make a positive contribution to the wider network of open spaces.
  7. Enhance accessibility to open spaces as well as to the blue infrastructure network, particularly to the borough's rivers and their banks, for recreational use, while ensuring that the biodiversity value is protected and enhanced in a measurable way.
  8. Improve opportunities for local residents and visitors to experience nature and provide educational opportunities, both formal and informal, within the development, to allow the public to embrace their local environment and develop potential stewardship behaviours.
  9. Make provision for the long-term sustainable maintenance and management of open space and green and blue infrastructure features on site, including supporting community involvement in stewardship of green and blue infrastructure networks, and ensuring there is space for growing food, including pollination and wildlife-friendly gardening.

**Commented [MB4]:** Within point B. please provide an additional point - 'Seek opportunities to create new, green open space.'

## Policy 37

### Public Open Space, Play, Sport and Recreation

- A. Public Open Space, children's and young people's play facilities as well as formal and informal sports grounds and playing fields will be protected, and where possible enhanced. Improvements of existing facilities and spaces, including their openness and character and their accessibility and linkages, will be encouraged.
- B. Existing open space, play space, sports and recreational buildings and land, including playing fields, should not be built on unless:
  - 1. an assessment has been undertaken which has clearly shown the facility, open space, buildings or land to be surplus to requirements; or
  - 2. the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or
  - 3. the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.

### Impacts on existing provision and requiring new provision

- D. The Council will require all major development proposals in the borough to meet the Public Open Space, play space, and playing fields and ancillary sport facilities needs arising out of the development by requiring the following:

### Public Open Space

- 1. Applicants should provide an analysis of existing open space provision in line with the Council's accessibility standards for travel to open spaces. Where there is inadequate existing provision and limited access to such facilities, publicly accessible facilities will be expected on-site to mitigate the impacts of the new development on existing provision.
- 2. Major developments will be required to provide new on-site open space in areas of Public Open Space deficiency, as shown in the Policies Map. This will be required in addition to any external amenity space.
- 3. Major developments outside of areas designated as Public Open Space deficient will need to provide on-site open space where feasible. Should such provision not be feasible, a payment in lieu will be sought as a planning obligation to enable the provision of new off-site open space, or improvements to the accessibility or quality of existing Public Open Space in the vicinity of the development. Planning obligations will also be sought towards management and maintenance of new or improved off-site open space.
- 4. Any new Public Open Space provided as a result of new development should deliver multi-functional benefits, including for nature conservation and biodiversity value as well as for the health and wellbeing of future occupants and surrounding local communities.

**Commented [MB5]:** Please consider removing this point. As recognised within policy 37, the borough experiences widespread Public Open Space Deficiency. It is therefore highly unlikely that open space/land/playing fields within the borough are 'surplus to requirements.' At a minimum, please change the word 'or' at the end of this policy to 'and' - to ensure that any loss is replaced by better provision elsewhere.

**Commented [MB6]:** open space, green wherever possible,

**Commented [MB7]:** green open space

## Policy 42

### Trees, Woodland and Landscape

- A. The Council will require the protection of existing trees and the provision of new trees in accordance with London Plan Policy G7 (Trees and Woodlands), as well as shrubs, hedgerows and other vegetation of landscape significance that complement existing, or create new, high quality green elements, which deliver air quality, climate change, amenity and biodiversity benefits.
- B. To ensure development protects, respects, contributes to and enhances trees and landscapes, the Council, when assessing development proposals, will:

### Trees and Woodlands

1. resist the loss of trees, including aged or veteran trees, unless the tree is dead, dying or dangerous; or the tree is causing significant damage to adjacent structures; or the tree has little or no amenity value and it is not possible to retain the tree as part of the development; or felling is for reasons of good arboricultural practice;
2. resist development that would result in the loss or deterioration of irreplaceable habitat such as historic parkland;
3. require that site design or layout ensures a harmonious relationship between trees and their surroundings, and will resist development which will be likely to result in pressure to significantly prune or remove trees;
4. require all developments to minimise impacts on existing trees, hedges, shrubs and other significant vegetation on site and on adjoining land, and provide sufficient space for the crowns and root systems of existing and proposed trees and their future growth. Developments within proximity of existing trees are required to provide protection from any damage during development;
5. require, where practicable, an appropriate replacement for any tree that is felled; where this is not possible, a financial contribution to the provision for an off-site tree in line with the monetary value of the existing tree to be felled will be required in line with the 'Capital Asset Value for Amenity Trees' (CAVAT);
6. require new trees to be of a suitable species for the location in terms of height and root spread, taking account of space required for trees to mature; the use of native species as well as large-canopied species are encouraged where appropriate;
7. where appropriate and relevant, require the provision of large-canopied tree lined streets as set out in the NPPF;
8. require that trees are adequately protected throughout the course of development, in accordance with British Standard 5837 (Trees in relation to design, demolition and construction – Recommendations).

**Commented [MB8]:** Please add an addition two points here.

9. Assess proposed planting schemes against potential impacts on the character of historic landscapes and open spaces.

10. Encourage planting in areas of hardstanding.

These two points can be expanded below with the following text;

*It should be borne in mind that where trees are planted within existing parks and landscapes they may disrupt historic planting schemes and create a sense of enclosure by breaking up previously open spaces. The environmental and social impacts of tree planting are maximised when areas of hardstanding are selected.*

## Policy 45 Tall and Mid-Rise Building Zones

Proposals for tall buildings will only be appropriate in Tall Building Zones identified on the Policies Map and in Appendix 3, where the development would not result in any adverse visual, functional, environmental or cumulative impacts, having regard to all criteria set out in London Plan Policy D9. To take account of the local context, proposals for tall buildings should address the following criteria:

### Visual Impacts

1. Tall buildings should respect the views and vistas towards heritage assets across the borough and in neighbouring boroughs, including distinctive roof line features.
2. The location of tall buildings should avoid substantial visual interruptions in areas with otherwise very consistent building and/or roof lines.
3. Tall buildings should respond to the analysis of views and vistas (Policy 31 'Views and Vistas ') towards the site to ensure the form and detailing are sympathetic to the wider context.
4. Tall buildings should consider the design of the lower, middle and upper parts of the tall building and how they work together as well as with the surrounding area and mid-range and long-range views.
5. Development proposals should be supported with graphic 3D modelling to assess the individual and cumulative impact of the proposal on both the existing and emerging skyline, and on day-time and night-time views, in line with Policy 44 'Design Process'.
6. Development proposals affecting the setting and approaches of the Kew World Heritage Site, must address all criteria set out in Policy 32 'Royal Botanic Gardens, Kew World Heritage Site '.  
[...]

**Commented [MB9]:** Please add a bullet point below to identify that tall buildings should have due regard for impact on open spaces:

'Development proposals for taller buildings must demonstrate consideration of the impact on public open space. Impacts may include views in and out of open spaces, the provision of natural light and overshadowing – which can be hugely detrimental to the amenity value and horticultural productivity of green open spaces'.