

Statement of Consultation

Local Plan

June 2023

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1. Introduction

- 1.1 The Statement of Consultation details how the London Borough of Richmond upon Thames has complied with the consultation requirements prescribed in the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) and the Council's Statement of Community Involvement (adopted 2019) in the preparation of the new Local Plan.
- 1.2 Richmond's Local Plan sets out policies and site allocations that will guide development in the borough over the next 15 years. The new Local Plan will replace the current Local Plan and the Twickenham Area Action Plan.
- 1.3 This Local Plan Consultation Statement details the consultation that was undertaken at each stage of the document's preparation. It accompanies the Local Plan Publication (Regulation 19) consultation. It will be updated to include a summary and details of the representations received during the Publication (Regulation 19) consultation when the Council submits the Plan to the Secretary of State for independent Examination in Public.

2. Overview of consultation

- 2.1 The Local Plan was subject to three stages of public consultation in line with the Town and Country Planning (Local Planning) (England) Regulations 2012:

Stage	Dates	Number of representations	Full details can be found
Direction of Travel Consultation (additional stage of consultation, not prescribed by legislation)	24 February 2020 – 5 April 2020	89 responses	Appendix 2
Pre-publication consultation (Regulation 18)	10 December 2021 - 31 January 2022	311 responses	Appendix 3
Publication consultation (Regulation 19)	9 June 2023 – 24 July 2023	To be published	To be published

2.2 The table below summarises the consultation that has been undertaken in relation to the Council's Statement of Community Involvement and the relevant paragraphs / appendices where the methods are discussed or documents can be found:

Proposed methods ¹	Direction of Travel Consultation		Pre-publication consultation		Publication consultation	
	Engage	Feedback	Engage	Feedback	Engage	Feedback
Local Plan consultee database (letters/emails)	✓ Para 4.4 App 2A	-	✓ Para 5.6 App 3A -	-	To be published	-
Notification letters to owners / occupiers	-	-	✓ Para 5.6	-	To be published	-
Web pages & digital communications	✓ Para 4.6 App 2B	✓ Para 4.8 App 2F	✓ Para 5.6 App 3B -	✓ Para 5.7 App 3F	To be published	To be published
Printed media – local press, leaflets and newsletters	✓ Para 4.6 App 2C, App 2E	-	✓ Para 5.6 App 3E	-	To be published	-
Social media	✓ Para 4.6 App 2D	-	✓ Para 5.6 App 3E	-	To be published	-
Face-to-face communication via workshops, meetings, drop-in events etc.	-	-	✓ Para 5.6 App 3G (virtual)	-	-	-
Libraries	✓ Para 4.6	-	✓ Para 5.6	-	To be published	-

2.3 Each stage of the consultation is discussed in more detail in the following sections.

2.4 A separate Duty to Co-operate Statement (June 2023) has been published to cover the engagement that has taken place with adjoining Boroughs and prescribed duty to co-operate bodies, as well as the context for sub regional and London wide joint working, to inform the stages of preparing the Local Plan, in line with the requirements of the NPPF.

¹ The SCI Table 1 sets out the potential methods of engagement that may be employed for planning policy consultations to reflect the principles for how the Council engages.

3. Background Research

- 3.1 The initial research phase of the Local Plan review began in the winter of 2019, following approval in July 2019 of an updated [Local Development Scheme for 2019 – 2022](#) which set out commencing the preparation of the next Richmond Local Plan. Although the Richmond Local Plan had only been adopted in July 2018, commencing a new Local Plan was agreed in the context of changes in national and regional policy and guidance, including a revised National Planning Policy Framework (NPPF) (2019) and an emerging new London Plan (final version to be published early 2020).
- 3.2 It was recognised that the Direction of Travel would need to address the main priorities for the borough, and set out the scale of the challenge and opportunities, set out in the report to the Environment, Sustainability, Culture and Sports Committee on 3 February 2020 which agreed the Direction of Travel for public consultation <https://cabnet.richmond.gov.uk/ieDecisionDetails.aspx?AllId=38337>, as:
- a) **Responding to the climate emergency and taking action:** In summer 2019, the Council declared a climate emergency and committed to taking robust action to tackle the local and global threat of climate change. In January 2020, the Council adopted its Climate Emergency Strategy. The Council's direction of travel in relation to the climate emergency is therefore clear; planning has an important role to play in minimising environmental impacts by cutting carbon emissions, waste and pollution. The Local Plan will play a central role in the transition to a low-carbon society, with policies to shape new and existing developments in ways that reduce energy need and consumption as well as greenhouse gases. This necessitates a new vision for the future of the borough and a new strategy for how this will be achieved. The Council already has progressive policies in place that deal with climate change mitigation and adaptation. The direction of travel is therefore to build upon these existing policies, and set out a clear pathway to achieving net zero carbon standards for all developments. The Council's Direction of Travel Consultation is seeking views as to what more can be done as part of the Local Plan to promote high quality sustainable development, and on the approach to encouraging a circular economy to ensure resources are kept in use for as long as possible.
- b) **Delivering new homes and an affordable borough for all:** The borough will have to accommodate housing growth and provide additional choice in the market, with the new London Plan setting a substantially higher housing target for the borough. The Council will need to undertake further research to assess future housing needs, and identify priorities for the type and size of new dwellings. The strategic direction of travel recognises there will need to be a clear strategy to bring sufficient land forward and consider where there is capacity for change, as well as explore new ways to increase housing delivery. Affordability in the borough remains an acute issue, and delivery of new genuinely affordable housing is low, due to the shortage of land and high values and costs. The Council's housing research will include an assessment of affordable housing needs. The strategic direction of travel maintains the strong approach to securing affordable housing contributions, and explores if there are new ways to deliver affordable housing.

- c) **Shaping and supporting our town and local centres as they adapt to changes in the way we shop:** The borough's centres have been performing well, but the retail sector is undergoing significant structural changes. The Council will undertake research to assess future needs. The strategic direction of travel recognises that the research may suggest a different approach is needed for managing our town and local centres.
- d) **Increasing jobs and helping business to grow:** Richmond is an enterprising borough, which has been relatively resilient to the economic pressures of recent years. However, there are some economic challenges, particularly as a result of limited land availability for employment purposes. The Council has already sought to protect existing employment sites and strengthened its policies as part of the last Local Plan review. The strategic direction of travel sets out that this approach will continue. The new London Plan also continues a protective approach, while suggesting intensification should be explored. It is recognised that the way people work and sectors are changing, and the Council will need to undertake further research to identify the range and type of premises needed in the future.
- e) **Protecting what is special and improving our areas**
- **Heritage:** The borough's exceptional historic environment is central to its character. Many parts of the borough are covered by conservation areas, including the majority of Richmond and Twickenham centres. The Council's strategic direction of travel is clear that the borough's historic environment will be preserved, and where possible enhanced. Therefore, the focus is on building on our existing policies to ensure they fully reflect national guidance and policy. In addition, the policies will seek to ensure that new developments will be of good and, if possible, exceptional design in order to make a positive contribution to the historic environment. The Council will also actively identify opportunities for development where these can result in improvements to the character and appearance of existing conservation areas.
 - **Culture:** The borough has a rich patchwork of cultural assets, ranging from the Royal Botanic Gardens Kew (a UNESCO World Heritage Site) and Hampton Court Palace, to smaller attractions and facilities. The strategic direction of travel continues to support the sustainable growth of the visitor economy.
 - **Green infrastructure and protecting our open land:** Richmond borough, the only London Borough that is intersected by the River Thames, is characterised by extensive areas of open land, designated as Green Belt and Metropolitan Open Land, as well as the borough's rivers and their corridors, which link across borough boundaries and have a strategic function in southwest London, Greater London and beyond. Whilst there is pressure on these designated areas from development, the Council's strategic direction of travel is clear that there will be continued strong emphasis on protecting, and where possible, enhancing the parks, open spaces and green spaces. Therefore, inappropriate development and loss of designated open land will be strongly resisted.
- The Inspector who conducted the last examination into the Richmond Local Plan stated that a review of Green Belt and Metropolitan Open Land boundaries may be necessary to inform how the Council best accommodates growth and development needs. Whilst the Council is committed to carrying out such a review as part of this new Local Plan, this does not mean that land will be necessarily released for development. The Council is of the opinion that the majority of the designated land fulfils the purpose of the Green Belt

and Metropolitan Open Land policy requirements. It is therefore not anticipated to release designated land for development, with the exception of potentially a small number of sites or pockets of land, provided that they no longer meet the policy criteria for designation. The Council will take an open and transparent approach, based on a methodology to be consulted and agreed prior to undertaking such a review of designated open land. Any site-specific changes will be made clear in future consultations for anyone to comment.

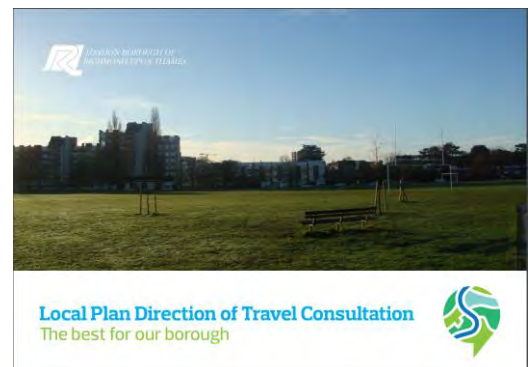
- f) **Increasing biodiversity and the quality of our green spaces, and greening the borough:** The borough's biodiversity, particularly the valuable habitats, are becoming under increasing pressure due to a growing population and the increasing use of parks and open spaces for recreation and enjoyment by local communities. The Council's strategic direction of travel is clear that we need to combat the local decline of population sizes of wildlife in general, whilst also continuing to protect our existing designated sites of nature conservation importance, which provide valuable habitats for protected and unprotected species. In order to achieve this, the Council will review the existing designated sites of nature conservation importance, with the view of identifying potential new sites for designation. In addition, the Council will carry out further research in relation to the practicalities of requiring and implementing a requirement for biodiversity net gain for all development sites. The Council's strategic direction of travel is also clear that the borough will develop its own Urban Greening Factor to identify the appropriate amount of urban greening required in new developments, such as the planting of new trees, green roofs, green walls etc. The Mayor of London has developed such a model in his new London Plan which boroughs can adopt in their Local Plans; however, given Richmond borough is already one of the greenest London boroughs, the Council's direction of travel is to develop our own bespoke model, based on local specific circumstances and tailored to the borough's needs.
- g) **Improving design, delivering beautiful buildings and high-quality places:** The borough's unique and distinctive character is an asset, and changing needs bring pressure on the local character. The Government has launched national guidance to provide more substance to delivering 'good design'. The Council's strategic direction of travel sets out high expectations for delivering design quality, including through the use of design reviews. The Council will need to undertake research into areas where there are opportunities for growth and where tall buildings/high density development may be appropriate.
- h) **Reducing the need to travel and improving the choices for more sustainable travel:** Some parts of the borough suffer from poor connectivity and limited public transport services. The Council has a role to play in influencing travel choices, to move towards sustainable forms of travel as the preferred mode and reduce car dependence, to reflect these local priorities set out in the adopted Climate Emergency Strategy, adopted Local Implementation Plan and emerging Active Travel Strategy. The strategic direction of travel will continue to ensure the impact of new development is minimised, including in relation to congestion, air pollution and emissions, and improve connectivity to public transport and encourage active travel, exploring the potential to encourage car-free and car-lite developments.

- i) **Securing new social and community infrastructure to support a growing population:** Social and community infrastructure, including for education, health and recreation, is essential for local communities, yet sites in the borough can be at risk due to pressures for development. The strategic direction of travel continues to protect these uses, and ensure the needs arising from new development can be accommodated.
- j) **Creating safe, healthy and inclusive communities:** Planning plays an important role in influencing the environment, with opportunities to encourage healthy lifestyles. The borough is already a safe and healthy place, and the strategic direction of travel continues to promote healthy and inclusive communities as a cross cutting theme, exploring opportunities to strengthen the approach such as to restrict new takeaways close to schools and promote community cohesion.

4. Direction of Travel Consultation: 24 February 2020 – 5 April 2020

Purpose of consultation

- 4.1 The Direction of Travel Consultation was an additional early stage of consultation not prescribed in the Local Planning Regulations. This stage of consultation is undertaken within the context of paragraph 155 of the NPPF which states that *“Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made”*. The consultation provided the opportunity for early engagement with interested parties and enabled Duty to Co-operate bodies, key stakeholders, national and local organisations, developers, landowners and the local community to comment.
- 4.2 This consultation focused on the vision for growth and future development within the borough, specifically identifying the key challenges, opportunities and critical planning issues and how they could be included in a new Local Plan. As part of this consultation, a Call for Sites from the community was requested. Council will assess these sites for their suitability, availability and deliverability to assist in the delivery of the spatial strategy and strategic policies.
- 4.3 Comments were invited on the Council’s proposed approach and whether there are missed opportunities or issues which should be included as well as if there are other proposed development sites which should be included within the Local Plan.



- 4.4 The consultation was due to end on 22 March 2020. This was ahead of an expected pre-election period for the Mayoral and London Assembly elections, however those elections were postponed by Government on 13 March 2020 due to the coronavirus outbreak. The implications of the COVID-19 pandemic become apparent towards the end of the consultation period, with the Government on 16 March 2020 asking everyone to stop non-essential contact with others and to stop all unnecessary travel. The Council was required to close its libraries on 20 March, and from that date many shifted to home working. The Council therefore extended the consultation period to 5 April 2020, making the new deadline clear on the Council's website from 18 March, and accepted any requests for representations to be submitted late, in recognition of the exceptional circumstances.

Who was consulted

- 4.4 The whole of the Local Plan database was notified of the Direction of Travel consultation. The database includes statutory consultees, local residents associations and amenity groups, local residents, local businesses, landowners, developers and consultants. A full list of consultees can be seen in [Appendix 1](#).

Consultation activities

- 4.5 Documents available for comment at this stage included (all available on the Council website https://www.richmond.gov.uk/new_local_plan_direction_of_travel_engagement):
- A summary leaflet explaining the Council's approach towards and background information for the Local Plan review as well as the Direction of Travel document.
 - Two online questionnaires were created. One specifically for the Call for Sites and the other to prompt a response from each section. The majority of questions are non-compulsory allowing consultees to respond to the sections they are most passionate about.
 - Draft Sustainability Appraisal Scoping Report: The SA aims to ensure that environmental, social and economic considerations have been integrated into the preparation of the Local Plan. The consultation on the Scoping Report is aimed specifically at the three statutory consultees with environmental responsibilities in England - the Environment Agency, Natural England and Historic England, although other relevant stakeholders with a sustainability remit or a local interest were also able to review the report and submit representations.
- 4.6 Public consultation activities included:
- A letter or email was sent to the Local Plan database to notify 1,918 consultees of the consultation ([Appendix 2A](#)).

- Consultation details and documents were published on the Council's website and the Council's consultation portal (**Appendix 2B**) – also available online:
https://www.richmond.gov.uk/new_local_plan_direction_of_travel_engagement
- The consultation was advertised in a public notice in the Richmond & Twickenham Times on 7 February 2020 and 5 March 2020 (**Appendix 2C**).
- Posters on community notice boards within the borough
- The Council issued a press release on 24 February 2020 'Richmond residents and businesses invited to shape future of the borough' (**Appendix 2D**) and this was publicised on the Council's social media accounts such as Twitter. There was also a Councillor Comment Spot on 18 February 2020 by Chair of Environment, Sustainability, Culture and Sport Committee 'Setting out our priorities for the development of the borough' which was about the Direction of Travel consultation (**Appendix 2E**).
- Hard copies of the consultation documents were available to view, along with spare copies of the summary leaflet and questionnaires to take away, in the Council's main libraries (until closed on 20 March 2020) and the Civic Centre (until closed on 25 March 2020).

4.7 Following the Direction of Travel consultation, the Council envisaged further engagement opportunities to inform and shape the new Local Plan later in 2020, as well as Duty to Co-operate engagement. A series of the Council's Community Conversation events were scheduled between May and October 2020 and the new Local Plan would have been a matter for engagement, however as a result of the COVID-19 pandemic the events between May and July 2020 were postponed. Government has updated guidance in the PPG so that plan-making can continue, and to promote effective community engagement by means which are reasonably practicable - strongly encouraging local authorities to use online engagement methods to their full potential including digital consultations, social media and providing documents for inspection on a public website.

Consultation responses and main issues raised

4.8 The Council received 89 responses to the Direction of Travel consultation, including the Call for Sites and Sustainability Appraisal. A Consultation Report with a summary of all responses, and schedules of all responses (and appendices) received is available in **Appendix 2F** and on the Council's website at:
www.richmond.gov.uk/direction_of_travel The main issues raised included:

Theme/topic area	Summary of Issues
Scale of the challenge, opportunities and setting the Direction of	<ul style="list-style-type: none"> • Seemed to be mixed opinions on balancing priorities and whether everything could be achieved e.g., is borough overpopulated or is growth possible, more or less parking etc.

Travel	<ul style="list-style-type: none"> • General support for approaches towards town centres and on brownfield sites, as well as strong support for principle of protecting green and open spaces.
Responding to the climate emergency and taking action	<ul style="list-style-type: none"> • Supported on the whole • Transport and travel e.g. reducing use of cars, were focus of most solutions put forward. • Ensure Council is helping those low-income families make the adjustment to reducing impact on environment. • Many thought that all new builds should be zero carbon.
Delivering new homes and an affordable borough for all	<ul style="list-style-type: none"> • Mixed support for policy direction on housing (some thought housing target was too ambitious and borough already over-populated). • Strong support for affordable housing delivery. • Regarding dwellings, many supported provisions of mixed sizes, as well as assisting individual needs/circumstances.
Shaping and supporting our town and local centres as they adapt to changes in the way we shop	<ul style="list-style-type: none"> • In favour of policy direction, and clear that town centres are valued. • Encourage flexibility in change of use/land uses, particularly considering business. • Support for accessible shops and services, in terms of meeting local needs in walking distance and for those with differing circumstances. • Recognition of changing centres and need for research to inform next steps and approach taken.
Increasing jobs and helping business to grow	<ul style="list-style-type: none"> • Most were in favour of proposed policy approaches • Support for retention of employment/industrial job use • More locally distinctive policies to be adopted focusing less on developing residential on industrial sites
Protecting what is special and improving our areas (heritage, culture and open land)	<ul style="list-style-type: none"> • Fear that a review would automatically lead to a loss of Green Belt and Metropolitan Open Land • Support for protecting designated open spaces, as well as continuing and even increasing protection of heritage sites.
Increasing biodiversity and the quality of our green spaces, and greening the borough	<ul style="list-style-type: none"> • Backing for most policy directions • Protection of green space supported and even to go further in terms of enhancements and maintenance • Agreed with Local Urban Greening Factor and Biodiversity Net Gain Requirement
Improving design, delivering beautiful buildings and high-quality places	<ul style="list-style-type: none"> • General support for the future direction of how to improve design, deliver beautiful buildings and high-quality places. • Tall buildings not appropriate but awareness this will happen and is necessary, so about making them as good as possible.
Reducing the need to travel and improving the choices for more sustainable travel	<ul style="list-style-type: none"> • Mixed response regarding reduction of car ownership through car free development, but support for improving traffic flow. • Bus travel extremely important to a lot of residents, as well as cycling and the need to make cycling more appealing overall. • Reduction in town centre car parking not supported, but general support for redevelopment of parking to make a space more multi-use.
Securing new social and community infrastructure to support a growing population	<ul style="list-style-type: none"> • General acceptance of approach • Particularly supportive of upgrading existing facilities, but also recognised need for new facilities. • Divide regarding need for school places, but recognised need for Council to encourage residential development where there are sufficient vacancies in school.
Creating safe, healthy and inclusive communities	<ul style="list-style-type: none"> • General support for initiatives • Shouldn't be a focus just on fast food outlets regarding healthy living • Consider shift in emphasis of Local Plan policies to importance of outdoor space rather than urban and indoor facilities.

Call for sites	<ul style="list-style-type: none"> • Site allocation suggested at various locations in the borough. • Predominantly residential use but acknowledged importance of mixed-use development.
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4.9 All responses were published and used to inform the preparation of the Pre-Publication version of the Local Plan. In addition, an [analysis of all responses received on the draft Sustainability Appraisal Scoping Report](#) set out how comments were taken into account in the [Revised SA Scoping Report](#) (July 2020).

Further informal engagement in 2021

4.10 As set out at paragraph 4.7, further informal engagement, particularly to continue to raise the profile of the emerging Local Plan and to feed into parts of the evidence base was continued at this stage. This included:

- A consultation by direct email was undertaken with key stakeholders (Natural England, Environment Agency, Historic England, Highways England, GLA and neighbouring authorities) on the Draft Methodology Paper for the Open Space Designations Review (8 to 21 March 2021) to ensure consensus on the approach. The 6 responses received informed the open land review and are set out in Table C4.1 of the [Green Belt, MOL, LGS and OOLTI Review overarching report 2021](#).
- A Richmond Partnership Conference in May 2021 on Unlocking the Potential: a new vision for our town centres and high streets, followed by a series of [Community Conversations](#) over Summer and Autumn 2021. Each Community Conversation included a presentation about the Local Plan, and a workshop to discuss ideas in breakout groups. A [summary of how a series of community conversations have informed the Draft Richmond Local Plan](#) was published (December 2021).
- A public consultation was undertaken to inform the Urban Design Study inviting comments on what is special about certain areas/places in the borough (17 May to 6 June 2021) <https://haveyoursay.citizenspace.com/richmonddecs/urban-21/> The consultation invited feedback on the places and place names, character area boundaries and descriptions, valued features and future strategies for the character areas. The feedback from the consultation fed back into the study to refine character area boundaries, places, valued features, negative qualities and design guidance. 412 responses were received and the analysis is set out in the [Urban Design Study](#) 2021 (Appendix F).
- Two workshops were held with school groups (Malden Oaks Pupil Referral Unit and Twickenham School) over summer/early Autumn 2021. This was to inform and engage young people about the Local Plan process, and included exercises the wider proprieties and implications need to be considered.

- 4.11 The Local Plan database were sent an update on Local Plan progress on 18 May 2021. This included notification that a Consultation Report on the Direction of Travel responses had been published. It provided an update that work on the Local Plan was continuing, although needing to consider the implications of the pandemic and the Government's proposed future reforms to plan-making. The notification updated that work on evidence base studies had commenced and included details of the consultation to inform the Urban Design Study as mentioned above.

5. Pre-publication consultation (Regulation 18): 10 December 2021 – 31 January 2022

Purpose of consultation

- 5.1 Public consultation on the Pre-publication version of the Local Plan was carried out in line with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 between 10 December 2021 and 31 January 2022, as agreed by the Environment, Sustainability, Culture and Sports Committee at its meeting of 17 November 2021:
<https://cabnet.richmond.gov.uk/ieListDocuments.aspx?CId=799&MId=5131&Ver=4>.
- 5.2 The purpose of this consultation was to invite comment on the draft Plan and the strategic vision, objectives and spatial strategy, place-based strategies and site allocations, and thematic policies.

Who was consulted

- 5.3 The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) state that the local planning authority must notify interested parties and individuals, including the prescribed bodies defined in the Regulations, invite comment, and must take into consideration the representations made in response.
- 5.4 The whole of the Local Plan database was consulted, as well as any additional respondents to the Direction of Travel consultation (who were also added to the database). See Appendix 1.

Consultation activities

- 5.5 Documents available for comment at this stage included (all available on the Council website
<https://www.richmond.gov.uk/draft-local-plan-pre-publication-version>):
- Pre-Publication Local Plan: this document sets out a strategic vision, objectives and spatial strategy, with place-based strategies and thematic policies and guidance. It also indicates proposed changes to the Policies Map.

- Sustainability Appraisal of the Pre-Publication Local Plan: this set out how the economic, environmental and social effects that may arise from the Local Plan (for the place-based strategies, site allocations and policies) have been assessed and taken account of.
- Equalities Impact and Needs Analysis: this assesses the draft Local Plan against protected equalities characteristics. The assessment has been undertaken to ensure that any potential negative equalities consequences arising out of the draft Local Plan have been considered and, where possible, removed or minimised so that opportunities for promoting equality and diversity are maximised.
- Habitats Regulation Assessment: this establishes whether the draft Local Plan, alone, or in combination with other plans or projects, is likely to have a significant effect on an international / European nature conservation site, i.e. Special Protection Areas (SPA), Special Areas of Conservation (SAC) or Ramsar sites. If this is the case, then the impacts on the integrity of the site must be considered by an Appropriate Assessment. This document sets out the findings of the Screening Assessment as well as the Appropriate Assessment for the emerging Richmond Local Plan.
- Health Impact Assessment: this sets out the findings of the assessment of the health and wellbeing impacts of the draft policies and site allocations.
- Flood Risk and Development Sequential Test: this assesses the level of flood risk of each site allocated within the Pre-Publication Local Plan, to determine their suitability / compatibility for the proposed uses in terms of flood risk. Its aim is to steer new development towards areas at the lowest risk of flooding.
- In addition, a number of updated evidence base studies were made available including:
 - Urban Design Study 2021
 - Open Land Review (Green Belt, MOL, LGS and OOLTI) 2021
 - Local Housing Needs Assessment 2021 (stage 1)
 - Employment Land & Premises Needs Assessment 2021
 - Retail & Leisure Needs Study 2021 (phase 1)
 - Strategic Flood Risk Assessment (2020)
 - Nature Conservation Review (2021).

It was noted that further phases and additional studies were due to be undertaken in early 2022.

5.6 Consultation activities included:

- A letter or email was sent to the Local Plan database to notify consultees of the Local Plan pre-publication consultation (Appendix 3A).
- In addition, a letter or email was also sent in regard of some sites affected by changes to site-specific designations, where it was felt awareness should be raised:

- to the owners/occupiers of those sites where the MOL designations were proposed for removal (Parcels 48 and 49 along Hampton Court Road)
 - to the one site proposed as Local Green Space that is not in Council ownership
 - to those with land interests in the new site allocations (landowners/planning agents – using details from the Land Registry if not already known).
- Follow up notifications were also sent on 14 January 2022 to those who had received a letter or email, primarily to remind them of the upcoming consultation deadline, and on the MOL designations to provide further information for context in response to some queries raised by residents.
 - Consultation details and draft documents were published on the Council's website and the Council's consultation portal (**Appendix 3B**) – also available online <https://www.richmond.gov.uk/draft-local-plan-pre-publication-version>
 - A response form was available (**Appendix 3C**).
 - The public consultation was advertised in a public notice in the Richmond & Twickenham Times on 16 December 2021 (**Appendix 3D**).
 - The Council issued a press release on 16 December 2021 'Have your say on the new Local Plan to help shape the borough's development' (**Appendix 3E**) which was also referred to in social media posts including on the Council's twitter accounts etc.
 - Hard copies of the consultation documents were available in the Council's main libraries and the Civic Centre (from 17 December 2021; due to the ongoing Covid-19 pandemic the Civic Centre was open, but on an appointment-only basis).
 - Bespoke emails were sent to the Duty to Co-operate bodies considered as relevant to the Pre-Publication Local Plan during January 2022 including neighbouring boroughs, the GLA and other statutory consultees. The email summarised the strategic cross boundary issues specific to the organisation, building on discussions that had informed the adopted Local Plan, providing an update on the evidence base and the contents of the Plan set out in the place-based strategies, site allocations and draft policies. Virtual face to face meetings were offered, although it was left to the Duty to Co-operate Bodies if they wished to utilise email correspondence instead. Officer meetings were held with the GLA and TfL, the Environment Agency, and the adjoining neighbouring authorities of Spelthorne, Elmbridge, Kingston, and Hounslow. More detail is provided in the separate Duty to Co-operate Statement (June 2023).
 - Local Plan virtual events were held in January 2022 which comprised three workshops hosted over Zoom, and two lunchtime Q&A information sessions. These were advertised with a follow up press release on 5 January 2022 'Attend Local Plan virtual events

to have your say on the development of the borough'. A report on the virtual events was published ([Appendix 3G](#)).

Main issues raised / consultation responses

- 5.7 The Council received 311 responses to the pre-publication consultation. A [schedule of all the detailed comments](#) to the Regulation 18 consultation received was published on the Council's website in May 2022, along with [appendices](#). A summary of the main issues raised:

General/Introduction

- Some comments did not agree with the order of the Plan.
- Some comments raised issues that had not been covered in the strategic context and trends, such as on health inequalities or Heathrow.
- A few comments related to the supporting documents to the Plan – the Sustainability Appraisal, the Habitats Regulation Assessment, and the Sequential Test Report.
- Some comments collated against the general/introductory parts of the Plan raised broad issues, such as on infrastructure.

Vision and Strategic Objectives, Spatial Strategy, Place-Based Strategies and Site Allocations

- General support for the vision. Some support for the emphasis including on climate change and responding to change. Some suggestions for areas to improve and issues to address. A few over-development concerns. Some felt could be meaningless without measurable targets and could be bolder. The Mayor of London comment the themes and objectives align well with the London Plan 'Good Growth' policies.
- Some general support for the strategic objectives, or support for some of them but not all. While some support for particular emphasis, should acknowledge competing objectives and some suggestions the climate emergency should take priority. Some suggestions for detailed issues to address across most of the themes.
- There was broad support for the concept of 'living locally' (Policy 1), although some concerns about how it would be implemented, the need to address public transport and the need to provide for the transport needs of those less mobile (elderly, disabled etc). Comments highlighted the need for clarification, and to ensure a range of infrastructure and facilities.
- There was broad agreement with the spatial strategy (Policy 2), although some concerns about the challenges and high-rise/high density development, with some suggestions for specific issues to be raised.
- Many respondents agreed with the overall approach to the place-based strategies and Site Allocations. The Ham & Petersham Neighbourhood Forum support the vision that builds on the Neighbourhood Plan. Some respondents disagreed with the separation into 'places', and felt issues were inconsistent or not addressed. Some comments about the Urban Design Study and a couple of comments related to overdevelopment. There were individual comments on specific places/sites, and some new sites suggested on the basis of their similarity to existing Site Allocations.
- A comment the Site Allocation for **Hampton Square** is an implicit threat to build on the part of the site designated as OOLTI. Sainsbury's comment the Site Allocation for the **Carpark for Sainsburys, Uxbridge Road, Hampton** allocation for 100% affordable housing is not justified. A significant number of comments were received on the Site Allocation for **Teddington Police Station**, from Park Road Surgery and patients and individuals supporting its allocation, asking the Local Plan to require the Surgery to be relocated there; the Met Police also commented the Site Allocation was unreasonable and inflexible. Harlequins Rugby Football Club raised the Site Allocation for **The Stoop** should include land to the east and has potential to accommodate 7 stories or more. The RFU comment on the Site Allocation for **Twickenham Stadium** that the stadium's role as an entertainment venue should be

recognised. The Met Police comment on the Site Allocation for **Twickenham Police Station** as it will be retained for policing and should be removed from the Plan. The Whitton Community Association comment the Site Allocation for Whitton Comm Centre should reflect a wider opportunity to create a masterplan and consider the needs-based community spaces. St George Plc and Marks & Spencer comment on the Site Allocation for **Kew Retail Park** seeking clarification on acceptable amount of retail and suggest the building heights are not backed up by robust evidence base. A number of comments from various parties were received on the Site Allocations for **Twickenham Riverside, Kneller Hall, Ham Close, Richmond Station, Homebase East Sheen, Sainsburys Lower Richmond Road, Stag Brewery**, and **Barnes Hospital**. The Department for Education support the allocations for schools at the Stag Brewery and Barnes Hospital. A number of detailed comments were received across the Site Allocations – from agencies such as TfL and Thames Water, to local groups such as Habitats & Heritage, and from individuals. A number commented on sites or uses that had been omitted from the Site Allocations, suggesting sites that could contribute to delivery or the landowner suggesting their site – Richmond Cricket Club, building next to the BP garage on Lower Mortlake Road, former car garage east of land on Sandycombe Road, Hanworth Homebase, Molesey Telephone Exchange, car park at Richmond Station/above Richmond Station, Fulwell Bus Garage and Lidl, above Sainsburys Uxbridge Road, detailed assessment of all town centres, Land to West of Stain Hill West Reservoir Upper Sunbury Road, Hydes Field Upper Sunbury Road, Richmond Park Academy, Christ's School, Mortlake Station area, LGC site, Arlington Works, Greggs bakery and the sports ground at Teddington Lock.

Theme: Responding to the climate emergency and taking action

- Overall general support for the emphasis given to climate change and pollution from organisations (reflecting their ambitions) and individuals, although some comments raise how this interacts with other issues and requirements, such as fuel poverty and the biodiversity crises, and particularly around implementation including in historic buildings, Conservation Areas and applicability across wider sites and non-residential refurbishment and conversion.
- Detailed comments on tackling the climate emergency (Policy 3) raise specific issues – decentralised energy networks, water management and flood storage. Comment about new development being a main area of planning control, and whether energy efficiency programmes on existing stock could be advanced.
- General support for the measures to minimise greenhouse gas emissions and promote energy efficiency (Policy 4), including from the Mayor of London although should reflect the BeSeen energy monitoring guidance. However, a number of comments about the impact on costs and deliverability, going beyond London Plan standards for on-site carbon reduction and ahead of the Government's gradual transition, and particularly that the proposed carbon offset amount was too high, without flexibility and an evidence base to justify the approach.
- On energy infrastructure (Policy 5), comment about requirement developments to contribute to future networks.
- Some developer comments on the high sustainable construction standards (Policy 6), going beyond the London Plan, as onerous and costly, and about reliance on BREEAM. Specific comments on water stress and modular construction.
- On waste and the circular economy (Policy 7), the Mayor of London supports the policy approach to whole life-cycle carbon assessments, safeguarding of existing waste sites and noting the West London Waste Plan/London Plan policies to assess proposals; the waste apportionment over the lifetime of the Plan should be accounted for. The EA comment on Construction Environment Management Plan for using the river to transport construction waste, and on preventing waste management activities causing pollution and emissions. Comment safeguarding Arlington Works conflicts with the London Plan.
- On flood risk and sustainable drainage (Policy 8), specific issues raised relating to development including the setback of developments to the tidal river, Rewilding Arcadia project, approach to the islands, and risks of sewer flooding and storm surges and rising sea levels. The majority of comments are technical issues raised

by the EA including on the sequential test and the sequential approach to the layout of sites, the approach to flood defences and flood storage, and recommend use of the 'central' scenarios for climate change allowances in line with Government advice.

- On water resources and infrastructure (Policy 9), comments focused on water stress, water quality status, and wastewater networks. These raise issues of demand and supply planning including Water Resource Management Plans, the responsibilities for network connections and capacity, achieving good ecological status/potential requirements, connections between foul and surface water networks and impacts on combined sewage outfalls, guidance for bank protection works and for construction sites considering dewatering and run-off, and support for water efficiency measures.

Theme: Delivering new homes and an affordable borough for all

- Acknowledgement of the commitment to the borough's housing target, to exceed as a minimum. A need to roll forward the target beyond 10 years. The broad locations for housing delivery (Policy 10) were queried by some residents/groups including identifying the impacts on existing infrastructure, while some developers felt the numbers were too low and the details were not clear, and particularly that employment land could provide a role.
- The Mayor of London raises the approach to affordable housing (Policy 11) is likely to be an issue of general conformity with the London Plan, as the threshold approach to viability should be reflected in policy. There was largely support for the aims of delivering genuinely affordable housing, but concerns about clarity and delivery. A number of issues raised around implementation, including the lack of a Whole Plan Viability Assessment, approach to small sites and for public sector portfolio, almshouses, First Homes, listed buildings, and the tenure split.
- A number of comments queried that the need for specialist older' persons housing should reflect the London Plan benchmark (Policy 12). Some comments raised the need for other specific types of housing - particularly for people with multiple and complex physical and health needs, for older/less mobile to downsize, and students, and understanding impacts on infrastructure was raised. Query on the type of new housing the policy applies to and clarity on the application of legal agreements and higher standards.
- A few comments seeking clarity on the space standards particular around open space (Policy 13).
- No comments on the dealing with loss of housing (Policy 14).
- The Mayor of London comment there is no need to demonstrate parking is no longer needed on Infill and Backland Development (Policy 15). Two comments about protecting back garden land.
- On small sites (Policy 16) a few comments about the types of development and its impact. The policy was supported by the Mayor of London.

Theme: Shaping and supporting our town and local centres as they adapt to changes in the way we shop and respond to the pandemic

- Specific issues were raised around support for the borough centres (Policy 17), with some reference to Class E, approach to other uses such as beauty salons and fitness studios, public realm and public toilets, and that the evidence base was not up to date. The Mayor of London supports the approach towards diversifying and repurposing centres. A comment the policy should include reference to major retail and leisure development also being directed to Site Allocations. Some place-specific comments, including defining the limits outside the secondary frontage of East Sheen, supporting a diversification of uses at Kew Gardens Station, beauty salons and fitness studios meeting community need such as Sandycombe Road and smaller centres, and that restricting convenience goods at Kew Retail Park is not supported by evidence.
- Specific issues were raised in terms of development in centres (Policy 18) including reference to Class E, that more pro-active initiatives are needed in relation to empty premises, frontages only defined where they can be justified, dealing with out of centre development, not acknowledging trip generation of visitor attractions such as

Twickenham Stadium, and that the evidence base is missing or piecemeal with particular concern the character of Richmond Town will be harmed by an imbalance in floorspace. Ideas put forward for a broad consideration of cultural activities or uses and highlighting of local assets.

- General support for managing impacts (Policy 19) including consideration of the impact on residents, and on health and well-being, with suggestions to mention other specific uses in terms of overconcentration, although some noted the Government's flexibility and effect of Use Class E. The Mayor of London note the policy aligns with the London Plan on the Agent of Change principles. A comment opposing support for a night-time economy in Richmond Town, and a comment from McDonalds that the restrictive approach to hot food takeaways is not supported by evidence.
- On local shops and services (Policy 20) a comment supporting approach to pubs and a comment about business rates.

Theme: Increasing jobs and helping business to grow and bounce back following the pandemic

- Some support for the principles of supporting the local economy and identified sectors (Policies 21 and 22), although others raised the policy does not recognise other sectors – leisure and tourism, and the voluntary and community sector.
- Overall, some comments seeking flexibility and the recognition that some employment floorspace is not suitable for adaption/upgrade and/or not viable, including listed buildings, with some comments referring to the impact of pandemic (Policies 21 to 24). A comment the approach does not reflect the London Plan and should recognise some floorspace is no longer viable. The Mayor of London supports the focus of new office development in town centres, and the approach to industrial as supported by the London Plan.
- A number of comments agreed with the overall principles but were suggesting sector and/or site-specific conditions necessitated a different policy approach in these cases, including on Platts Eyot, Greggs Bakery, St Clare Business Park, Onslow Hall, LGC, Shurguard, and Arlington Works.
- General support for securing affordable, flexible and managed workspace (Policy 25), with some comments about the detailed implementation in terms of policy thresholds and targets, and viability.
- General support for the approach to visitor economy (Policy 26) and the particular references to RBG Kew and Ham House. Some comments about existing facilities, in terms of travel and whether in sustainable locations. Comments requested references to particular issues/places including to provide support for infrastructure for the Royal Parks, expanding this area around East Sheen/Stag Brewery and Richmond Park, and Twickenham Stadium for appropriate development which complements the sporting and entertainment use.
- Support for the approach to telecommunications and digital infrastructure (Policy 27), with some comments on the details of assessments particularly the visual impact.

Theme: Protecting what is special and improving our areas (heritage and culture)

- Some support for the policy approach to local character and design quality (Policy 28) or specific aspects it addresses such as shopfronts, lighting. Historic England consider the Plan provides a strong basis for conservation and enhancement of the historic environment. A number of comments on specific issues – seeking reference to enhancing where appropriate, following Secured by Design and early engagement with the Met Police on major development, the protection of the Royal Parks, Conservation Areas as well as the Urban Design Study places and character areas, healthy places and the requirements of health organisations, gated developments, banners, and digital advertising.
- Some support for the policy approach to designated heritage assets (Policy 29). Specific details raised – wording around change of use, dealing with substantial harm, threat of climate change and the balance with sustainability and other needs,

and issuing enforcement notices. Comment policy not compliant with the NPPF, and too specific wording around reinstatement of historic features.

- Specific issues raised on non-designated heritage assets (Policy 30) – no reference to historic industrial sites and watercourses, issuing enforcement notices, and historic walls. Comment the policy not consistent with the NPPF and should refer to significance and a balanced judgement.
- General support for the approach to Local Views and Vistas (Policy 31), and the importance of CGI and 3D modelling to assess visual impacts. Historic England and the Mayor of London seeking detailed wording. Interest in the forthcoming Local Views SPD and some comments on specific views – importance in the Royal Parks and opportunities in the River Crane corridor, and threats from outside the borough. Comment the policy is too prescriptive and should be redrafted in line with the London Plan.
- Support for the policy on Royal Botanic Gardens, Kew World Heritage Site (Policy 32) with detailed comments from Historic England, RBG Kew and the Mayor of London on specific aspects, including RGB Kew seeking a degree of balance in dealing with the management of the WHS.
- On archaeology (Policy 33), comment on allowing time for field investigations.

Theme: Increasing biodiversity and the quality of our green and blue spaces, and greening the borough

- Overall general support for protecting and recognising the value of green and blue spaces, with emphasis on the multi-functional network and the acknowledgement of pressures, including by the Royal Parks, FORCE, the PLA, the EA and Habitats & Heritage. The Royal Parks suggest a stand-alone policy due to the importance of the Parks.
- There are broad supportive comments and some detailed issues raised on blue and green infrastructure (Policy 34) – including dark corridors used by bats and other species, green corridors, wildlife corridors, impact of artificial lighting, invasive species and dogs, larger sites and their connectivity, significance of the Crane Valley, the public open space hierarchy, attenuating flooding by naturalising the River Crane below the Mereway Weir, and naturalising riverbanks, inappropriate tree planting and barriers to enhancements.
- Some support for the protection of open land designations (Policy 35) including by the Mayor of London. Detailed comments relate to cycle storage and accessibility for disabled persons, exceptional circumstances, visual impacts of developments on sites in proximity, flood storage areas, and the policy wording should match the London Plan and NPPF. The Local Green Space (LGS) sites proposed are supported generally by Habitats & Heritage, with specific support for Udney Park Playing Fields to be retained as LGS. Additional designations as new sites/removals are suggested – Teddington Library Gardens as an additional LGS; Mortlake playing fields should be designated as LGS; Putney Town Rowing Club should be an additional MOL; David Lloyd Club should be removed from MOL; Petersham Nurseries should be removed from MOL; RFU eastern edge should be removed from MOL; Hampton Water Treatment Works should be removed from the Green Belt; removal of and the MOL assessments for Fulwell Golf Club and Longford E & Schools contain inaccuracies; retitle the MOL assessments for Little Green and Thames Old Deer Park and queries the details of the Old Deer Park MOL assessment; the former Thames Water Operational land adjacent to west of Sunnyside Reservoir, Lower Hampton Road should not be in the Green Belt.
- Comments on Other Open Land of Townscape Importance (OOLTI) (Policy 36) related to the nature conservation criterion, re-provision and defining openness, quantum and timing. Support for the Ellerman Avenue becoming OOLTI.
- General support for the approach to public open space (Policy 37), including by Sport England noting the evidence base is being kept up to date, and by the Mayor of London for play and informal recreation. Support for improving underutilised spaces and securing wider community needs through community use agreements. Detailed comments relate to active environments, impacts of excessive wear-and-tear, increasing green space, biodiversity, and encouraging the Council to take

responsibility for maintenance. Site-specific comments relate to the Royal Parks, Udney Park Playing Fields, Heathfield Recreation Ground.

- Comments on urban greening (Policy 38) only relate to the benefits of urban greenspace, and the details around the policy implementation including relating only to major development, no evidence to justify the restrictive 70% requirement, and the ways it can be supported.
- General support for the policy approach to biodiversity (Policy 39) including the 20% BNG beyond Government requirements, although comments also raise whether this is feasible and viable without evidence. A number of comments related to dark corridors and/or dark spaces, with suggestions for areas for restrictions of light pollution. Detailed issues raised include biodiversity potential as a baseline, measurable BNG and DEFRA metric 3.0 the mitigation hierarchy, offsite contributions, submitting data to GiGL, riverside areas, reducing deficiencies in access to nature, integrated nest boxes, buildings-based species, management by site owners, and geodiversity. A number of site-specific comments were raised (analysed against Appendix 4) in support of proposed designations/upgrading including Udney Park, Fulwell and Twickenham Golf Courses, Twickenham Junction Rough, Portlane Brook and Meadow, Richmond Park and Associated Areas, Bushy Park and Home Park, Longford River in Richmond, and all the candidate Sites of Importance for Nature Conservation (SINCs). Some comments specified that parts of the sites should not be included. Comment objecting to upgrade of Hampton Water Treatment Works and Reservoirs. Some comments on Barn Elms.
- Detailed comments on rivers and river corridors (Policy 40), including water quality and undeveloped buffer zones, the multiple benefits of protecting river corridors, river-related industry and protection of slipways, securing public access, ambitions applicable to the River Crane, GLA's Green Grid, groundwater hydraulic flow systems, barriers to movement, drowning prevention, cross-borough working to gain benefit along the river, covered rivers, the overlap with Marine Planning, and site-specific conditions at Platts Eyot.
- Detailed comments on moorings and floating structures (Policy 41), in relation to riverside structures, enforcement action, limited powers regarding appearance of boats, approach to new or extensions to houseboats, moorings and piled bank protection methods causing shading.
- Comments on trees, woodland and landscape (Policy 42), a policy approach welcomed by the Woodland Trust, related to details on ancient and veteran trees, increasing canopy cover, source of stock, and protection of hedgerows.
- On floodlighting and other external artificial lighting (Policy 43), most of the comments raise concern about the impact of lighting on biodiversity and how the policy will be implemented, although Sport England consider the positive benefits of sports lighting. Specific issues raised – how harm can be demonstrated, a precautionary approach, existing baseline and temporary installations, need for lighting, newer forms of LED lighting, reducing light spill, and protection of dark corridors.

Theme: Improving design, delivering beautiful buildings and high-quality places

- Comments around the subjective nature of design, some raised it was not clear how proposed developments would be assessed including for smaller developments and who is involved (Policy 44). The virtual event feedback considered what was important to 'good design' including materiality, sense of connection and community, and sustainability.
- Comments were mixed about the tall and mid-rise building zones (Policy 45). Some felt the policy should not set maximums and is too prescriptive; the Hillingdon judgement was referred to as making it clear tall buildings can be found to be acceptable in areas that are not identified where they meet the London Plan. Some respondents felt the Urban Design Study was flawed, including the character assessments and sensitivity, and should not be used to reference acceptability of tall and mid-rise buildings, and while some agreed with the principles, they felt it lacked detail in the supporting evidence to underpin specific zones. Historic England support the policy and provides appropriate criteria to positively manage the conservation of the historic environment and consideration of local character, with

comments on where to improve including to avoid harm to vistas and views; the Royal Parks, RBG Kew and the National Trust also comment on assessing the impact on views and heritage assets. RBG Kew request further information and justification on heights for zones in proximity to Kew Gardens. The EA raise the biodiversity of setting tall buildings back from the river, and FORCE would like the criteria applied to the River Crane, recognising the impact of tall buildings on adjacent open spaces.

- A number of site-specific concerns were raised (analysed against Appendix 3) commenting on the scope for a higher number of storeys/wider scope (often the landowner) on Greggs, Kew Retail Park, LGC site, and The Stoop, or that there should be a lesser maximum height/scope of the zones (often residents) on Kew Retail Park, Stag Brewery, Richmond Station, North Sheen (Lower Richmond Road), Teddington (railway side), and The Stoop.
- Impact on neighbour amenity and overlooking from first floor terraces raised, as implied not normally acceptable yet the assessment is subjective and permitted in a specific case (Policy 46).

Theme: Reducing the need to travel and improving the choices for more sustainable travel

- General support for the policy approach to reducing the need to travel and improving choices for sustainable travel (Policy 47). A number of suggestions for improvements/issues to address, particularly to support cycling and walking, including: safeguarding existing transport infrastructure; bus operations can be made more efficient; mitigation informed by a multi-modal assessment; inclusive mobility; impact of traffic and associated air pollution on designated sites and priority habitats; taxis; coach parking; congestion and highway safety; standards for cycling proposals; the walking and cycling network; river corridor opportunities for active travel including River Crane and DNR; need to consider cross-borough active travel links.
- Highways England confirm policies and allocations will have no boundary issues related to the Strategic Road Network, but along with TfL consider exploration of borough-wide assessment and modelling would be useful in understanding impacts.
- TfL welcome the intention to adopt London Plan parking and cycling standards and encourage car-free development (Policy 48). A number of comments on specific areas relating to how the policy would be operated, including excessive paving, the approach to car clubs, car-free development, electric vehicle charging and parking, delivery and servicing, cycle parking and storage, Controlled Parking Zones and disabled parking spaces.

Theme: Securing new social and community infrastructure to support a growing population

- Providers raise comments on how policy requirements (Policy 49) apply to their service needs/estates, seeking flexibility for alternative uses such as residential, and from the Met Police seeking contributions to cover policing infrastructure.
- Education provision (Policy 50) raised in terms of identifying sites/admission priority including for the Stag Brewery.

Theme: Creating safe, healthy and inclusive communities

- General support for the policy approach to health and wellbeing (Policy 51). Some comments raised about the impacts of the ageing population including their ability to walk and cycle and how impacts are assessed. Some issues raised that are not covered in detail – community safety, housing standards, and public toilets, healthy food neighbourhoods and school super zones.
- On allotments (Policy 52) support for their retention but issues raised about investment, their statutory designation, and waiting lists.
- On local environmental impacts (Policy 53), detailed comments were mostly from the Port of London Authority, Thames Water and the Environment Agency, raising clarification around implementation including odour impact assessment, sensitive receptors, groundwater impacts, and waste sites.

- On basements and subterranean developments (Policy 54), detailed matters raised on demonstrating a scheme will not puncture/degrade a sealed/isolated aquifer or increase/exacerbate flood risk, and installation of a pumped device where there is a waste outlet from a basement.

Implementation, Delivery and Monitoring

- The impacts on particular infrastructure raised by The Royal Parks and the Clinical Commissioning Group (CCG).

5.8 All responses were published, analysed and used to inform the preparation of the Publication version of the Local Plan. A report of all representations received including a summary of the main issues raised, and the Officer’s responses is available in **Appendix 3G**.

6. Publication consultation (Regulation 19): 9 June 2023 – 24 July 2023

Purpose of consultation

- 6.1 Having reviewed and analysed all responses received and taking account of Duty to Co-operate and other engagement activities that have taken place, the policies and site allocations within the pre-publication version of the Local Plan were updated to create the Publication version.
- 6.2 Public consultation on the Publication Local Plan was carried out in line with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 between 9 June and 24 July 2023, as agreed by the Environment, Sustainability, Culture and Sports Committee at its meeting of 24 April 2023 and Full Council at its meeting of 27 April 2023 approved the draft of the Plan: <https://cabnet.richmond.gov.uk/ieListDocuments.aspx?CId=173&MIId=500000034>
- 6.3 The Publication Local Plan is the Council’s final version of the Local Plan and the final opportunity for consultees to comment. At this stage comments should relate to issues of legal and procedural compliance, the “soundness” of the Plan and the “Duty to Co-operate”.

Consultation details and responses

- 6.6 This Statement, published alongside the Local Plan Publication (Regulation 19) consultation, will be updated to include a summary and details of all the consultation and the representations received during the Publication (Regulation 19) consultation when the Council submits the Plan to the Secretary of State for independent Examination in Public.

7. List of Appendices

Appendix 1: List of consultees – version used for Regulation 19 Publication Consultation which incorporates previous respondents. Contact details have been removed.

Appendix 2: Direction of Travel consultation

2A: Letter to consultees. Sent by email or post depending on availability of email addresses.

2B: Copy of consultation details on the Council's website

https://www.richmond.gov.uk/new_local_plan_direction_of_travel_engagement

2C: Press notice in RTT 7 February 2020 / 5 March 2020

2D: Press release 24 February 2020 – also available online:

https://www.richmond.gov.uk/council/news/press_office/older_news/press_releases_february_2020/richmond_residents_and_businesses_invited_to_shape_future_of_the_borough

2E: Councillor Comment Spot on 18 February 2020 by Chair of Environment, Sustainability, Culture and Sport Committee 'Setting out our priorities for the development of the borough'

2F: Responses to Local Plan Direction of Travel consultation

Appendix 3: Pre-publication consultation

3A: Letter sent to consultees. Sent by email or post depending on availability of email addresses.

3B: Consultation details and draft documents were published on the Council's website and the Council's consultation portal

https://www.richmond.gov.uk/draft_local_plan_pre_publication_version

3C: Pre-publication consultation response form

3D: Public notice in the Richmond & Twickenham Times on 16 December 2021

3E: Press release on 16 December 2021 'Have your say on the new Local Plan to help shape the borough's development'

3F: Report of 'Pre-Publication' Draft Local Plan (Regulation 18) Consultation Responses including Responses to Local Plan pre-publication consultation and Officer comments

3G: Richmond Local Plan Engagement event [report](#) (2022)

Appendix 1: List of consultees – version used for Regulation 19 Publication Consultation which incorporates previous respondents. Contact details have been removed.

First name	Surname	Organisation
Statutory Consultees		
		Heathrow Airport Ltd
Hilary	Bishop	Telereal Trillium (BT Telephone Exchanges)
		BT Group plc
		Civil Aviation Authority
Andrew	Smith	Clinical Commissioning Services
Richard	Wiles	Head of Commissioning – Prevention and Wellbeing, Richmond and Wandsworth Councils
		Coal Authority
		Croydon Council
		Department for Levelling Up, Housing & Communities - Planning Casework Team
		Department for Levelling Up, Housing & Communities - Development Plans Team
		Department for Business, Enterprise & Regulatory Reform
Phoebe	Juggins	Department for Education (DfE)
		EDF Energy
		Elmbridge Borough Council
		Historic England
Katie	Parsons	Historic England
		Greater London Archaeology Advisory Service (GLAAS)
		Environment Agency
Paul	Stewart	Environment Agency
		Environment Agency Estates Department
		Environment Agency
James	Togher	Sustainable Places Team Leader, Kent and South London Environment Agency
		E.ON Energy
Steve	Staines	Friends, Families and Traveller and Traveller Law Reform Project
		GLA - Planning Admin
		GLA - London Plan Team
Hermine	Sanson	Greater London Authority
Celeste	Giusti	Greater London Authority
Andrew	Payne	Greater London Authority
		Health & Safety Executive
		Highways England Company Limited
		Highways England
Andree	Gregory	Highways England
Teresa	Gonet	Highways England
		GLA Housing and Land Directorate
		London Ambulance Service
		London Borough of Hammersmith and Fulham
David	Gawthorpe	London Borough of Hammersmith and Fulham
Danalee	Edmund	London Borough of Hounslow
		London Borough of Hounslow

		London Borough of Wandsworth
Claire	Morison	London Fire Brigade - Drivers Jonas LLP
		London Fire and Emergency Planning Authority
Mel	Barlow-Graham	London Fire and Emergency Planning Authority
Ilinca	Diaconescu	London Gypsy and Traveller Unit
Tonia	Parsons	London Mental Health Trust
Peter	Spring	London United Busways
Helen	Monger	London Parks and Gardens Trust
Elisabeth	Chapple	Metropolitan Police
Rob	Applegarth	Metropolitan Police
		Metropolitan Police Service
Damien	Holdstock	Amec Foster Wheeler (on behalf of National Grid)
Matt	Verlander	Avison Young on behalf of National Grid
Phil	Edwards	National Grid Property
Spencer	Jefferies	National Grid
Matt	Verlander	Avison Young on behalf of National Gas Transmission
Steve	Carter	Cadent Gas Ltd
Piotr	Behnke	Adviser, Sustainable Development, Thames Team Natural England
		Natural England
		NHS London Healthy Urban Development Unit
Mary	Manuel	NHS London Healthy Urban Development Unit
		Hounslow and Richmond Community Health (HRCH)
		Your Health Care
		Your Health Care
Kathryn	Magson	NHS Richmond Clinical Commissioning Group
Sarah	Blow	NHS Richmond Clinical Commissioning Group
Tonia	Michaelides	NHS Kingston Clinical Commissioning Group
Kath	Cawley	NHS South West London Clinical Commissioning Group (CCG)
Anna	Webster	NHS South West London Clinical Commissioning Group (CCG)
Liz	Ayres	NHS South West London Clinical Commissioning Group (CCG)
Martin	Ellis	NHS South West London Clinical Commissioning Group (CCG)
Ben	Homer	NHS England
William	Cunningham-Davis	NHS England
		NHS Property Services Ltd
Rebecca	Marwood	NHS Property Services Ltd
		Network Rail
		North London Waste Plan (NLWP)
		Npower
Anneli	Harrison	Office of Rail Regulation
		Planning Inspectorate
		The Planning Inspectorate
		Public Health Lead, London Borough of Richmond
Lucy	Owen	Port of London Authority (PLA)
Michael	Atkins	Port of London Authority (PLA)
		The Royal Borough of Kingston upon Thames
		Runnymede Borough Council
		Scottish and Southern Energy plc.

		Spelthorne Borough Council
		Spelthorne Borough Council
Howa	Sim	South West London & Springfield University Hospital
		SW London & St George's MH Trust (Headquarters)
		South West London & St George's Mental Health NHS Trust
		Sport England
		Sport England
Margaret	Blackburn	Royal Parks Estates
Paul	Richards	The Royal Parks
Rose	Freeman	The Theatres Trust
Ross	Anthony	Theatres Trust
Phil	Dominey	South West Trains
Katharine	Harrison	Surrey County Council
Ben	Addy	Sustrans
		Sustrans
Peter	Mercer	The National Federation of Gypsy Liaison Groups (NFGLG)
Audrey	Bowerman	Transport for London
		Spatial Planning, Transport for London
Danny	Calver	Transport for London
		Transport for London
Abi	Gannon	Transport for London
Abi	Gannon	Transport for London
		Transport for London
Laura	Stritch	TfL Planning
		TfL London Streets
Shahina	Inayathusein	LU Infrastructure Protection
		West London Mental Health NHS Trust (Headquarters)
Michael	Harbour	West London Mental Health NHS Trust
Sarah	Ellis	West London Waste
Roger	St Paul	West London Waste
Other national / regional organisations		
Alice	Roberts	CPRE London
John	Sadler	CPRE London
Ian	Runeckles	Education Funding Agency
Samantha	Powell	Education Funding Agency
Sarah	Thornton	Fields In Trust
Natalie	Chapman	Freight Transport Association Ltd
Mamun	Madaser	Habinteg Housing Association
James	Stevens	Home Builders Federation Ltd
		London Enterprise Panel
		London Economic Action Partnership (LEAP)
		Marine Management Organisation
		Mineral Products Association
		National Car Parks Ltd (NCP)
		Road Haulage Association
Jonathan	Hampson	Zipcar
Oliver	Newham	The Woodland Trust
Owen	Pugh	The Woodland Trust
Bridget	Fox	The Woodland Trust

Caseworker		Twentieth Century Society
Steven	Tabbitt	National Trails Office
		Vodafone and O2
Alex	Towers	BT
Jane	Evans	Three
Residents Associations and Amenity Groups etc		
Ralph William (Ben)	Mackworth-Praed	Barnes Community Association
Emma	Robinson	
Brant	Long	Barnes Hospital Neighbours
David	Stott	Barn Elms Sports Trust
David	Bird	Barons Residents Association
Dianne	Stilwell	Blagdon House Estate Management Company Ltd
John	Watson	Cole Park Residents Association
John	Waxman	Crane Valley Partnership
Helen	Montgomery-Smith	Eel Pie Island Association
		FORCE
Rob	Gray	Friends of the River Crane Environment
Gary	Backler	Friends of the River Crane Environment (FORCE)
Ben	Mackworth-Praed	Friends of Barnes Common
Owen	Jones	Friends of Bushy & Home Parks
Andrea	McCulloch	Friends of Cambridge Gardens
Jon	Rowles	Friends of Heathfield Recreation Ground and Environs
		Friends of Murray Park
		Friends of North Sheen Recreation Ground
Peter	Willan	Old Deer Park Working Group
Peter	Willan	Friends of Richmond Green
Vivien	Harris	Friends of Richmond Green
Richard	Polson	Friends of Richmond Park
Max	Lankester	Friends of Richmond Park
Paula	White	Friends of the Earth - Richmond & Twickenham
Simon	Tompsett	Friends of the Earth - Richmond & Twickenham
David	Trigg	Friends of Twickenham Green
		Friends of Whitton Library
Andrew	Grimshaw	Foundation and Friends of Royal Botanic Gardens
		Get Madd
Peggy	Curtis	Ham Amenities Group - now Ham and Petersham Residents' Association
		Ham and Petersham Neighbourhood Forum
		Ham and Petersham Neighbourhood Forum
Anne	Powell	Ham and Petersham Association
Charles	Doe	Ham and Petersham Association
Geoff	Bond	Ham and Petersham Association
Charles	Doe	Ham and Petersham Association
Brian	Willman	Ham & Petersham Neighbourhood Forum
Jan	Gare	Ham Library Friends Group
		Hampton Hill Association
Tony	Marks	The Hampton Society
Sylvia	Bridge Le Cluse	The Hampton Society
Iacopo	Sassi	The Hampton Society
William	Redfern	The Hampton Society

		Hampton Wick Association
		Ham Riverside Lands Ltd
		Ham United Group
Joseph	Noble	Kew and Ham Sports Association
David	Polya	Kew Community Trust
		Kew Neighbourhood Association
Roger	Mason	Kew Residents' Association
Wendy	Crammond	Kew Residents' Association
		Kew Society
Caroline	Brock	Kew Society
Michael	Glazebrook	The Kew Society Village Market
Geoff	Bond	Martingales Close Residents Association
Mark	Elliott	Morley and Alexandra Roads Residents Association
Francine	Bates	Mortlake Brewery Community Group
Peter	Eaton	Mortlake Brewery Community Group
Tim	Catchpole	Planning Representative, Mortlake Brewery Community Group
Kate	Woodhouse	Mortlake Community Association
Mireille	Stanton	Mortlake with East Sheen Society
		Mortlake with East Sheen Society
Tim	Catchpole	Chair, Mortlake with East Sheen Society
Shaun	Laplough	Past Chair Mortlake with East Sheen Society
Jill	Hamer	North Barnes Residents' Association
		Prospect of Richmond (Peter Willan, Paul Velluet and Laurence Bain on behalf of)
A	Robson	Queen's Road Estate Resident Community Association
Johanna	Eschbach	RiBRA (Richmond Bridge Residents Association)
Patricia	Spaight	Richmond Society
Louise	Fluker	Richmond Society
Nuggy	Lianos	Richmond Society
Charles	Pineles	Richmond Society
Hilary	Pereira	River Thames Society
David	Herring	Sheen Conservation Group
Marilyn	Hawkins	St Margarets Estate Residents' Association
Mike	Allsop	Strawberry Hill Residents' Association
David	Cornwell	Strawberry Hill Residents' Association
		Teddington Society
		Teddington Society
James	Sinclair	Teddington Society
Geoff	Howland	Teddington Society
Andy	Karski	Teddington Society Planning Group
Graeme	Fraser-Watson	Teddington Society Planning Group
Mark	Jopling	on behalf of The Teddington Society and the Friends of Udney Park Playing Fields
David	Shaw	The Alberts Community Association
Colin	Hines	Twickenham Park Residents Association
Douglas	Orchard	Twickenham Society
John	Ormsby	West London River Group
Martin	Peace	Whitton Community Association / Whitton Community Centre and Social Club
Martin	Peace	Whitton Community Association

Yvonne	Hewitt	York House Society
Camilla	Panufnik	York House Society
Other Local Groups or Organisations		
		The Access Specialist Day Centre
		Age UK Richmond upon Thames
		Age UK Whitton Social Centre
		Borough of Twickenham Local History Society
Robert	Gordon	Campaign for Real Ale
Andrew	Whitehead	CIS and HHJS Federation
		Community Police Partnership
Betty	Hopkins	Crane Community Centre
		Disability Action & Advice Centre
		Multicultural Richmond
		Environment Trust for Richmond upon Thames
Paul	Velluet	Garrick's Temple to Shakespeare Trust
		Groundwork
David	White	Hampton Fuel Allotments Charity
Robert	Leadbetter	Hampton and Kempton Waterworks Railway
Clare	Snell	1st Hampton Sea Scouts
Deborah	Lightfood	Independent LSCB Chair (Safeguarding Children)
Alec	Lever	Richmond Labour Party
Eugene	Dreyer	Langham House Estate Maintenance Company Ltd.
	Alexandra Robb	London Wildlife Trust Crane Park Project
Alison	McIntosh	Lynde House Care Home
		Marble Hill Society
Lionel	Beer	Metropolitan Water Board Railway Society
		Metropolitan Police - Design Out Crime Office/South West Richmond and Hounslow Borough
Michael	Frazer	Probus Club of Twickenham
Geoff	Adams	Putney Town Rowing Club
Philip	Briggs	Richmond Bat Species Action Plan Steering Group
James	Page	Richmond and Twickenham Green Party
Anne	Newton	Richmond Chamber of Commerce
Juliet	Ames-Lewis	The Richmond Charities
Heather	Mathew	Richmond Council for Voluntary Service (RCVS)
Jonathan	Rowland	Richmond Cycling Campaign
James	Armstrong	Richmond Cycling Campaign (RCC)
Martin	Davis	Richmond Environment Trust
Geoff	Noble	Richmond Environment Trust
Jabeen	Thantrey	Richmond Ethnic Womens Association
Tim	Lennon	Richmond Cycling Campaign
Nick	Tittle	Richmond Cycling Campaign
Paul	Luton	CTC (National Cyclist Organisations)
		Richmond Cycling Campaign
		Richmond Music Trust
		Richmond Parish Lands Charity
David	Sharpe	Richmond Ramblers
		Richmond School Sport Partnership
		Richmond upon Thames Council for Voluntary Service
Kathryn	Williamson	RCVS
Jill	Fielder	Richmond upon Thames Scouts

Joan	Senior	SCAMPS
Jill	Paterson	SCAMPS
Chris	Dawe	SCAMPS
Kate		SCAMPS
Krystyna	Kujawska	SCAMPS
James	Alexander	Social Enterprise Richmond
Mike	Priaulx	Swifts Local Network: Swifts & Planning Group
Colin	Cooper	Habitats & Heritage
Vicky	Phillips	Habitats & Heritage
Andy	Sutch	Sport Richmond
		St Johns Ambulance Brigade Twickenham & Whitton
Simon	Cartmell	Teddington Community Sports Ground CIC
		Teddington Community Sports Ground CIC
Jason	Debney	Thames Landscape Strategy
		Thames Landscape Strategy
Ruth	Hatton	Thames Strategy Kew-Chelsea
		The Twickenham Museum
Steve	Burchell	Thistleworth Marine Ltd
John	Evans	Whitton and Heathfield Police Liaison Group
Gareth	Elliot	Whitton Park Sports Association Community Interest Company
Mandy	Smith	Whitton Youth Zone
David	Lemon	Youth Enterprises
Individuals		
John	Abbott	
David	Abel	
Phillip	Ackerley	
Graham	Henderson	
Chris	Ackley	
Geoff	Acton	
R J	Adams	
Susan	Adams	
Lesley	Adamson	
Zarrin	Aga	
Carol & Robin	Ager	
M	Ainscouch	
Karen	Ainsworth	
David & Felicity	Aitchison	
Louise	Alder	
M	Alderson	
S	Aldridge	
Linda	Alexander	
Margo	Alford	
Matt	Allchurch	
Kathy	Allen	
Malcolm	Alsop	
Susannah	Amoore	
D	Anderson	
Ian	Anderson	
John	Anderson	

Catherine Thomas and Valentin	Andreev	
Charlotte	Andrew	
	Angell-Wells	
Clarissa Louise	Angus	
Angela	Appleby	
Ester	Arana	
	Archer	
J	Armstrong	
John	Arrowsmith	
Ken and Lynne	Atkinson	
Siobhan	Atkin	
Anthony	Atkinson	
Carole	Atkinson	
Keith	Atkinson	Member FUPPF
M	Austin	
Anxhela	Avdullari	
Elisabeth	Ayling	
F	Bacchus	
Sarah	Bachelor	
Nick	Bagge	
L	Bailey	
Lynne	Bailey	
SJ	Bailey	
Pamela	Bailes	
Philip	Bailes	
N'Yasha	Bailey	
Laurence	Bain	
Christine	Baines	
Angela	Baker	
Christopher & Tamsin	Baker & Osborn	
Helen	Baker	
Peter	Baker	
	Baker	
Bekir	Balkandali	
Anne	Ball	
Sarah	Ball	
Stephen	Ball	
Frank	Bandura	
Michael	Bangham	
Claire	Banks	
Granville	Banks	
Helen	Bantock	
Liz	Baran	
Catherine	Barker	
Paul	Barker	
Tim	Barker	
Andrew	Barnard	
Kathleen	Barnes	
Philip	Barnes	

Sandra	Barnes	
Adrian	Barnett	
Angela	Barnwell	
Eileen	Barrie	
S	Barshall	
A	Barter	
James	Bartholomeusz	
Irina	Barton	
Irina	Barton	
R	Bashliev	
Pamela	Bate	
Paulette	Bates	
Richard	Bateson	
Stephen	Baughan	
M	Baumann	c/o Christian Leigh, Leigh & Glennie Ltd
Coral	Baxter	
S	Baxter	
Jasmine	Bayley	
Thomas	Bayley	
Peter	Beardow	
Margaret & Richard	Beasley	
Tristram	Beasley-Suffolk	
JF	Beattie	
Robert	Bebington	
B	Beck	
Glynis	Becker	
Hilary	Beedham	
Sally	Beeson	
John	Bell	Friends of Twickenham Green
Julian	Bell	
Kathleen. P	Bell	
Louise and Colin	Bell	
Ed	Bellamy	
Chris	Bemand	
Frances	Bennett	
S	Bennett	
Lester	Berry	
Cicilia	Beverly	
Erin	Bibby	
Janina	Bieberstein	
Cathy	Bird	
Bernadette	Bisdee	
R	Binns	
John	Blackwall	
Niall	Blair	
Tim	Blair	
Robert	Blakebrough	
Doreen	Bland	
Christopher	Bligh	
C	Blewitt	

Lauren	Bloch	
Amanda & Andy	Bodley	
Matthew	Bolton	
Richard	Bolton	
Geoff	Bond	
Jane	Bond	
Su	Bonfanti	
M	Bogod	
Marian	Bontempo	Asgill Lodge Action Group
Kate	Boswell	
A	Bowen	
Charlotte	Bowen	
Graham	Bowers	
Susan	Boyd	
Sally and James	Boyle	
Svetlana	Braddell	
Antoinette	Brady	
Jane	Braham	
Adam J	Brand	
D	Brand	
Mark	Brand	
P A	Brand	
David Paul John	Brewin	
Elaine	Brewis	
Eric	Bridgewater	
Tony	Briggs	
Victoria	Brittain	
Caroline	Britton	
Peter	Britton	
Eleanor	Broad	
Jim	Brockbank	
Alan	Brocklehurst	
C	Brooks	
Stephanie	Brooksbank	
Maurice	Broughton	
C.A.	Brown	
Campbell	Brown	
D F	Brown	
David	Brown	
Denis	Brown	
Georgina	Brown	
Jasmine	Brown	
Susan	Brown	
Paul	Browne	
Pamela	Bryant	Chairman Patient Participation Group
A.C.	Bryer	
Mervyn	Bryn-Jones	
John	Buckingham	
Julia	Buckley	
Jeanette	Buncher	

Nan	Bunn	
Nicola	Burbidge	
Michael	Buckley	
Richard	Burfoot	
Daniel & Sabina	Burke	
Noel	Burke	
Jennifer	Burns	
Jon	Burrell	
P.	Burrows-Smith	
Ian	Butcher	
Christine	Butler	
Michael	Butlin	
MA & JA	Byrne	
Lira	Cabatbat	
F	Cahill	
Jeremy & Harriet	Calvert	
Alison	Campbell	
Russell	Campbell	
Sara	Campin	
C	Canham	
Jean	Carlin	
Nicholas	Carpenter	
David & Virginia	Carr	
Diana	Carr	
M	Carroll	
Susan	Carson	
Simon	Cartmell	
Alan	Cartwright	Architect
Nigel R	Cartwright	
Bec	Carty	
Maria	Casey	
Matthew	Casson	
Mary	Casteldine	
Michael	Castlelton	
Judith	Catto	
Angela	Cavill	
Michael	Chaffe	
Erika	Chernavskaya	
Rati	Chihambakwe	
Denis and Mary	Chapman	
Howard	Chappell	
Ronald	Chappell	
Lisa	Charles	
Anne	Chatterton	
Kerry	Chauhan	
Vin	Chauhan	
Amit	Chauphuri	
Steven	Cheah	
Patricia	Cherry	
Cherry	Chesire	

David	Chick	
Joanna	Childs	
M	Childs	
Peter	Chivers	
Jayshree	Chohan	
Tina	Christison	
Karen	Chuck	
Jackie	Clare	
H	Clark	
Iain	Clark	
Ruth	Clark	
M J	Clarke	
N	Clarke	
Peter	Clarke	
Rob	Clarke	
David	Clay	
Elizabeth	Clegg	
Jane	Cliff	
John	Clinch	
Henry	Clive	
Colin	Clode	
David	Cloke	
Miranda	Cnattivingivs	
Carol	Cocks	
Kathleen	Cocks	
Patrick Henry	Cocks	
Susan	Coelho	
Judie	Cole	
Louise	Cole	
Louise	Cole	
Lucille M	Cole	
Michael	Cole	
Sue	Cole	
Danielle	Coleman	
John	Coleman	
M	Coleman	
Robert	Coleman	
T.R.	Coleman	
Margaret	Collenette	
Andy	Collier	
A	Collins	
Diana	Collins	
Jan	Collins	
Peter	Collins	
Jacky	Colliss Harvey	
Jeff	Collius	
William	Comery	
Sally	Comfort	
Melissa	Compton-Edwards	
Richard	Compton	

Rosemary	Connellan	Member: Teddington Society
A.S.	Connolly	
Rose	Constantine	
Anne	Coogan	
Iris	Cook	
Cythare	Cooper	
Eileen	Cooper	
Laura	Cooper	
Christopher	Corfield	
H	Cornforth	
Ann	Cornick	
H	Cory	
Helen	Coterill	
	Coulton	
B.	Costin	
Marcia	Cotton	
Jean	Cousens	
Rod	Cowan	
Elisabeth	Cowie	
Phillip K	Cox	
G	Craig	
Christine	Craik	
Douglas R	Craik	
J	Craik	
S.D.	Cramond	
George	Cranston	
Thomas	Cribb	
Paul	Cripps	
Stephen	Croft	
Catriona	Crombie	
Geraldine	Crook	
Alan&Diana	Croot	
David	Cross	
Michael	Cross	
Tim	Crowther	
R G	Cummings	
Edward	Cummings	
Robert Philip	Cunliffe	
P	Curnock	
John	Curtis	
Roger	Cutler	
Peter	Danckwerts	
David	Dandridge	
R	Danks	
Paul	Dare	
Philip	Darker-Smith	
Ashley	Davies	
C	Davies	
Elaine	Davies	
Nicole	Davies	

Tony	Davies	
W	Davies	
G	Davis	
Helen	Davison	
Margaret Judith	Davison	
Marrin	Dawson	
Martin	Dawson	
S	Dawson	
Malcolm	Day	
Martyn	Day	
Mike	Day	
Kevin	De La Noy	
Jeanette Christina	Dean	
Peter John	Dean	
Paul	Deane-Williams	
John	Deards	
David	Deaton	
John & June	Demont	Members: Teddington Business Community and Teddington Society
A.M.	Dempsey	
Dawn	Devaney	
Diana	Devlin	
Alison	de Lord	
Edward & Emma	de Waal	
C	Dewhurst	
Prehlad	Dhall	
Edward	Davies	
Sarah	Dietz	
J	Dilley	
Adam & Fiona	Dixon	
Mel	Dixon	
Emma	Dobson	
Charles and Gail	Doe	
Jean	Doherty	
Laurent	Doliveux	
Brian	Dolton	
J K	Donald	
John	Doran	
Carolyn	Doughty	
Matthew	Doughty	
Richard	Dragun	
Eleanor	Dowsing	
Colin	Draper	
Pauline	Droop	
Mr & Mrs S	Drudge	
R.A.	Drummond	
Linda	Duberleu	
Susan	Duff	
Tom	Dunbar	
Emma	Durnford	

Corinna	Durocher	
Leslie	Dyos	
Sally	Dyos	
A	Dyson	
Peter	Eaton	
Kate	Eberwein	
Caroline	Edelin	
Paul	Edelin	
Greg	Edelston	
Paul	Edey	
Philippa	Edmunds	Member Pools on the Park User Group
Barry	Edwards	
Jamie	Edwards	
Margaret	Edwards	
Melissa	Edwards	
Tracey	Edwards	
Isabel	Elder	
Eva	Eldridge	
Martin	Elengorn	
Kerry	Eley	
Marian	Elliot	
Mark	Elliott	
D M	Elliott	
Albert	Ellis	
	Elwine	
Mark	Emmett	
Bilge	Erengul	
Kerem	Eryavuz	
Emily	Etherton	
P M	Etter	
Anthony J	Evans	
Sylvia Margaret	Everett	
Arndt	Faatz	
Renata	Fairbanks	
D	Fairley	
T & S	Farnsworth	
David	Farrant	
Jeanette	Farrell	
Jennifer	Farrell	
Aiden	Farrelly	
	Farries	
Jamie	Farrow	
Michael	Fasosin	
Frances	Feehan	
Graham	Ferrier	
John	Fevyer	
Joanna	Fiddian	
David	Field	
Roger	Field	
R N	Field	

John	Finnerty	
Alison	Fish	
Leslie	Fisher	
Rosie	Fisher	
Russell	Fisher	
K	Fitzgerald	
Joseph	Fitzgibbon	
Sheila	Fitzgibbon	
Kevin	Flanagan	
R	Fleming	
D	Fletcher	
Eileen	Folan	
John	Foley	
W	Folkard	
Daniela	Folkes	
Stephen	Foot	
Eileen H.M	Ford	
Sue	Ford	
Alison	Fordy	
Laura and Nick	Forrest	
Lesley	Forster	
Alan	Foster	
M	Fowsela	
Peter	Francis	
Maj	Franklin	
M H De	Freitas	
Andree	Frieze	
K	Frost	
Carl	Fry	
Christine	Fry	
Barbara	Fryatt	
K	Fynn	
Andre	Gal	
Beryl	Gale	
Rupert, Rachel & Bobby	Gale	
Rogan	Gale-Brown	
Marie	Gallaher	
Jacqui	Gallagher	
Fabio	Galvano	
Angus	Gardner	
Florin	Garland	
Sarah	Garrett	
J	Gartland	
Molly	Gartland	
Richard	Geary	
Elizabeth	George	
Richard	Geary	
Mark	Gee	
J A	Geffen	

Claire	Geller	
Arthur	Gelling	
Nancy	George	
J. O.	Gibson	
Joan	Gibson	
Judy	Giddings	
Charles	Gilby	
Freda	Gilby	
G	Gilby	
Tim	Gilby	
Jeremy	Gill	
Linda	Gill	
N.J.	Gill	
Mary	Gillingham	
Robert	Gingell	
Molly	Gittens	
Luigi	Giucca	
Jonathan	Glencross	
Jo	Glynn	
Susan	Goddard	
Timothy E	Godfray	
Mike	Goldsmith	
Hilary and Chris	Gooch	
Judith	Good	
Debbie	Gooday	
R	Goodgame	
J.S.R.	Goodlad	
Tom	Goulbourn	
Jennie	Gower-Smith	
Colin	Graham	
Rosalind	Graham Hunt	
A	Gray	
John	Gray	
K V	Gray	
Mary	Gray	
Colin	Greasby	
D.P	Green	
Graham	Green	
Solomon	Green	
S.J.	Green	
Sadie	Green	
A R	Greenway	
M	Grey	
William	Griffin	
Charles	Griffiths	
Zachary	Grimm	
Nicholas	Grundy	Park Road Surgery
Peter	Gullick	
R G	Gummings	
G	Hadden	

Gary	Hagreen	
Katarina	Hagstrom	
	Haigh	
Barbara	Haigh	
Cherry	Haigh	
Rob	Haines	
Andy	Hale	
Jean	Hall	
Jerry	Hall	
L	Hall	
Trevor	Hall	
Melissa	Hallan	
Ann	Halliday	
Pete	Halsall	
	Hambleton	
Sue	Hamilton-Miller	Twickenham Society
Jeremy	Hamilton-Miller	
Freda	Hammerton	
Richard	Hammons	
Paul	Hampartsoumian	
	Hampson	
Max	Hampton	
Lynda	Hance	
Julie	Hanna	
Kalpana	Hannapaneni	
Lea	Hanrahan	
Harriett	Hardiment	
S	Harding	
Paul	Hargraves	
Trish	Harle	
	Harrington	
Tim	Harrington	
	Harris	
Jane	Harrison	
Rosemary	Harrison	
Margaret	Harrop	
Claude	Harry	
Gareth	Harper	
Venetia & John	Harper	
Joan	Hart	
Unity	Harvey	
Richard	Hassal	
Rebecca	Hastings	
Barrie	Hatch	
Michelle	Hatton-Smith	
Andy	Haunton	
Tom	Hautot	
Bette	Hawell	
Alison	Hawkins	
Malcolm	Hay	

David	Hayne	
Anne	Haywood	
Colin	Hazelwood	
David	Head	
B	Heads	
L	Hearn	
Katherine	Heath	
Justine	Hebert	
B	Heeley	
Peter	Heighes	
Anna	Hemming	
	Henderson	
Dan	Henderson	CoverCoaches
Dan	Henderson	
James and Nicola	Henderson	
	Herring	
Fred	Herron	
Yvonne	Hewett	
Ann	Hewitt	Mortlake Brewery Community Group
Joan	Hewson	
Janet	Higbee	
Julie	Hill	
Martin	Hill	
Nick	Hill	
Kelly	Hill	
	Hilton	
Trish	Hindley	
Margaret S	Hine	
Terence	Hirst	
Suzanne	Hobbs	
M Pahela	Hodder	
David	Hodgetts	
Tim	Hodgson	
Georg	Hoefler	
Brian	Holder	
Walter & Fiona	Holland	
John	Holmes	
Elizabeth	Honer	
Stephen	Honeybourne	
Roger	Hoodless	
Richard	Hooker	
Yvonne	Hooker	
Linda	Hooper	
Peter	Hope	
Emma	Hopson	
	Horton	
Romayne	Hortop	
Alison	Horwood	
Geoffrey-Jose	Hounson	
Kenneth	Howe	

	Hudson	
Janet	Hughes	
Rachel	Hughes	
Liz & Tim	Hughes	
Jonathan, Sarah & Alex	Hughes	
Sara	Hunt	
Amanda	Hunt	
Ann	Hunter	
T. A.	Hunter	
Thomas	Hunter	
R & P	Husow	
Penny	Hutson	
Hester	Huttenbach	
Audrey	Hutton	
Keith	Hutton	
Martyn	Hutton	
R	Hutton	
J.M.	Hyde	
Katie	Hyson	
Zoe	Ide	
Efosa	Idehen	
Dean and Lisa	Illis	
Madeleine	Inglehearn	
Janet	Ingram	
Linda	Ingram	
Edward	Inions	
Mary	Ironmonger	
Valerie	Irvin	
Christina	Isis	
Calvin	Isaac	
Sandra	Isaac	
G	Isup	
Irene	Iwunze	
Dominique	Jabbour	
Adrienne	Jack	
Felicity	Jackson	
J	Jackson	
Jill	Jackson	
Peggy	Jackson	
Harry	Jacobs	
Robin	Jaffray	
Maria	James	
Joanna	Jamieson	
	Jeffery	
Helene	Jelman	
Myrna	Jelman	
John	Jenkins	
Caryn	Jenner	
Anthony	Jenni	

Michael	Jennings	
Alison	Jennings	
P	Jennings	
Jane	Jewell	
Kavita	Jindal	
Benjamin	John	
N Maureen	John	
S	John	
D M	Johnson	
Gemma	Johnson	
Martin & Elizabeth	Johnson	
Murray	Johnson	
Michael	Johnston	
V	Johnson	
Alistair	Johnston	
L G S	Johnstone	
Denise	July	
Barbara	Egan	
Mary	Egan	
Derek	Jones	
Graham	Jones	
J	Jones	
Paul	Jones	
R	Jones	
Ian	Jones-Healey	
Mark	Jopling	
Keith	Jordan	
Patricia	Julve	
Sam	Kamleh	
Sri Lakshmi	Katragunta	
Timothy	Kaye	
Rod	Kebble	
Susan	Keenes	
Mike	Keete	
Gavin	Kelly	
Elizabeth, Seymour and Joshua	Kelly	
Graham	Kench	
Anna	Kendall	
Pam	Kent	
Julia	Kernick MBE	
Manjit	Khosla	
Sue	Kidger	
Steve	Killi	
Andrew	King	
Jessica	King	
Martyn	Kingsford OBE TD	
Vera	Kirikova	
Karen L	Kirkham	
Martin	Kirrage	

Gemma	Kitson	
	Kneeshaw	
	Knight	
Joe	Knight	
Richard	Knight	
Frances	Krans	
Krystyna	Kujawska	
Rick	Kumar	
Wendy & James	Kyrle-Pope	
Vicky	Lack	
Sara	Lalenia	
Sirvosh	Lalenia	Medco Pharmacy
Juliet	Lally	
Annabel	Lamb	
Patricia	Lambkin	
A S	Lamplugh	
J	Lang	
M	Langford	
Anthony	Langridge	
J	Langrish	
Bing	Langston	
Paul	Lapham	
R	Larronicu	
M	Lascarides	
Andrew	Latham	
Chris	Lawes	
Mark	Lawson	
	Leach	
Beverley	Leach	
Joy	Lee	
Katie	Lee	
	Leicester	
Maureen	Lanbourne	
Robin	Legard	
Andrea	Legrand	
Dennis	Leigh	
V	Lennuyeux	
Duncan	Leopold	
Timothy	Lester	
Sioney Roy	Letton	
Carey	Leuw	
Kate	Le Vesconte	
Mary-Louise	Le Vesconte	
Christopher	Lewis	
Marie	Lewis	
Jo	Liddell	
Sylvia	Liffen	
David	Linnette	
Victoria	Little	
Arlene	Livingstone	

Patty	Lloyd	
Linda	Loader	
Geraldine	Locke	
Jacobus	Lombard	
Claire	Longstaff	
George	Longstaff	
Derek	Lonsdale	
Paul	Lonsdale	
Christopher	Loughton	
Margaret	Loughton	
Alexander Serge	Lourie	
Jane	Lovell	
Judith	Lovelace	
M	Lowe	
Daniel	Lowe	QPR Community Coach QPR FC
Dave	Loweth	
Hannah	Lukacs	
Paul	Luton	Cycling UK
Hilda Patricia	Lyon	
Stephen	Macklow-Smith	
Carla	Madureira	
Katy	Makepeace-Gray	
Jo	Mallabar	
Paul	Mallon	Chairman Barnes Eagles Football Club
Carrie	Manly	
Alfredo	Marcantonio	
Anthony	Marks	
Christopher	Marlow	Founder Revolution Tennis
David	Marlow	
P E	Marlow	
Janet	Marriott	
P M	Marshall	
V	Marshall	
Johann	Martin	
Keith	Martin	Member - Barnes Community Association
L E	Martin	
Peter	Martin	
Robert	Martin	
C	Marx	
Chris	Mason	
J M	Mason	
Justin	Mason	
Marjorie Jean	Mason	
Kate	Massey	
Kathleen	Massey	
Michael	Massey	
Paul	Massey	
Danny	Masting	
Roger	Mathias	
Tania	Mathias	

Vivienne	Mathias	
David	Mattes	
A.	Matthews	
Anne	Maxwell-Jackson	
	May	
Andrew	Maywood	
Charlotte	McCafferty	
E E	McClelland	
Elizabeth	Mccormack	
Francis	McCormack	
Gerry	McCarthy	
John	McCarthy	
Vince	McCaughey	
Stella	Mccusker	
Mike	McCutcheon	
Fiona	McDaniel	
Ron	McEwen	
Winifred	McGee	
Anna	McGeoghegan	
Pam	Mcglade	
Nicola	McHugh	
Francis	McInerny	
Francis	McInerny	Heatham Alliance
M	McKerrell	
Ian	McKinnon	
Kevin	McMahon	
A	McMarlow	
B J	McNeil	
Russell	McPherson	
Dick	McSweeney	
Shirley	Meaker	
Hugh	Mead	
Sarah	Meagher	
Kathy	Meek	
H	Memory	
Moya	Meredith Smith	
J	Merricks	
Dulce	Merritt	
Janice	Merritt	
M J	Metcalf	
Ian	Micklewright	
Wendy	Micklewright	
Ursula	Midgley	
Andy	Millbank	
Jane	Miller	
Ian	Millington	
Max	Millington	
M. Ann	Mills	
David	Mills	
John	Miln	

M	Milton	
Peter	Milton	
M	Milukas	
Tom	Minns	
E	Mirzoeff	
Arlene	Mitcham	
Ruth	Mitchell	
Rob	Mitchener	
Tricia	Mole	
Susan	Money	
Patrick	Mongan	
Martin	Monteiro	
M F	Moran	
Helen	Montgomery-Smith	Eel Pie Island Association
JW	Morgan	
Laura	Morgan	
S	Morgan	
Mike	Morris	
Jane and Roy	Morrison	
Gillian	Morrow	
Anne	Morozgalska	
William	Mortimer	
Lawrence	Moss	
Janet	Mothersill	
P	Moulden	
R	Mount	
Victoria	Mowat	
Henrike	Mueller	
Conor	Mulhern	
Adrian	Mullen	
Edwin	Mullins	
Maia	Mukerjee	
Dave	Munby	
P	Mundy	
A	Myers	
Anil Kumar	Namburi	
Katja	Nartey	
David	Natas	Architect and local resident
Mark	Neal	
Gavin	Neath	
T & M	Neill	
Mary	Nesbitt	
John	Newham	
Mark	Newham	
Sharon	Newman	
Margaret	Nicholson	
H	Nicol	
William	Nicol-Gent	
Edward	Nirzoeff	
Helen	Noble	

Karin	Noble	
Stuart	Noble	
Sarah	Nockles	
Dale & Juliet	Nolan	
Ray	Norbury	
Andrew	Norman	
Susan M	Norgan	
Lynda	Norman	
Wendy	Norman	
Wendy	Norman	
Jolyon	Nott	Jolly Horn Creative
Rebekah	Nott	
T	Nowell	
Claire	Novakovic	
Una	O'Brien	
John	O'Brien	
Clair	O'Brien-White	
Clare	O' Riordan	
Charles	Oakden	
Anthony	Oakley	
R A	Odell	
Roger	Offord	
Gbadebo	Ogunlami	
Jo	O'Hagan	
Zohre	Omidyegrneh	
John	O'Neill	
Hannah	Oneill	
Douglas	Orchard	Twickenham Society
Denis	O'Regan	
Nicola	O'Regan	
Paul & Karen	Ormesher & Lim	
Robert	Orr Ewing	
Jenny	Orton	
Nuala	Orton	
Alison	Osborne	
Anthony	Osoba	
Jen	Osorio	
James	Ostrowski	
Bill	O'Reilly	
Chris	O'Rourke	
Adele	Ottinger	
E.J.	Otty	
Neville	Otty	
J.E.	Ould	
George	Overton	
B	Owen	
Diana	Owen	
Mary	Page	
Anthony	Paish	
Natalya	Palit	

John	Pallet	
	Palmer	
A F	Palmer	
Christine	Palmer	
N R	Palmer	
Sohinder	Panesar	
	Parfitt	
David	Parish	
Margaret	Parker	
Alison	Parkes	
Judith	Parkinson	
Catherine	Parry-Wingfield	
		Staines Town Football Club Ltd
Jessica	Parsonson	
Anne	Partington-Omar	
Simon	Passmore	
Bhanu	Patel	
	Patel	
Jill	Paterson	
James	Patterson	
Antonia	Payne	
K	Peachey	
H R	Pearce	
G	Pearn	
Peter	Payan	
Stephanie	Pemberton	
	Pendrich	
D M	Penton	
John	Perry	
John	Perry	
Julie	Perry	
Michael and Jackie	Perry	
Shaun	Perry	
Michelle	Petersen	
Linda	Pettitt	
Michael & Clare	Phelps	
Jane	Phillips	
Michael	Phillips	
P.J.	Phillips	
Victoria	Phillips	
David	Pickering	
Nicki	Pierce	
Pauline	Pike	
Goncalo	Pinto	Football Coach QPR FC
Mary	Pitteway	
Stephen	Pope	
Howard	Potter	
Angela	Poulter	
D & J	Poulter	
Bernard	Power	

	@PP'	
Gerald	Pratt	
John & Sandra	Preston	
Martha	Preston	
Jonathan	Price	
Joy	Price	
Paul Hart	Prieto	
C.G.T	Prince	
Nikos	Prokopiou	
Deborah	Provis	
David	Pugh	
S. C.	Pugh	
Graham	Putts	
Phoebe	Quayle	
Helen	Quinn	
Magda	Rabenda	
S	Rajan	
L	Ralph	
Ross W	Randall	
Keith	Rankin	
Stephen	Rankin	
Paul	Rawkins	
Carol	Rawlings	
David & Karen	Rawson	
V.M.	Rayment	
Teresa	Read	
Simon	Redding	
Jonathan	Reding	
C	Reece	
Peter J	Rees	
Olive	Reeves	
Leah	Regel	
Mary	Regigiano	
Margaret	Regnaud	
John	Reilly	
Christopher	Reilly	
Lena	Renlund	
Richard	Renton	
John & Gwen	Reekie	
Linda	Rees	
Noel	Reeve	
John	Repsch	
Nicholas	Rettie	
G	Rhoades-Brown	
Carolyn	Rhodes	
N	Richards	
Teresa	Richardson	
Audrey	Rigge	
Steve	Rigge	
P G	Rigge	

Dawn	Roads	Sharpe Refinery Service (Hydro-Carbons) Ltd
Glen	Robert	
Brian	Roberts	
G & J	Roberts	
Nigel	Roberts	
Simon	Roberts	
A D	Robertson	
A.J & A. M	Robins	
Sheila Jean	Robinson	
W.O.	Robledo	
E W	Robottom-Leppink	
Eanesy	Rodd	
Jeremy	Rodell	
Andrew	Roe	
Gilda	Rogner	
Lizabeth	Rohovit	
Philip	Robin	
Pam & Geoff	Rollason	
Amanda	Root	
David	Rose	
Sam	Rosenthal	
Catherine	Rostron	
S.	Rothgoode	
Laura	Rowan	
F A	Rowbotham	
Gerald	Rowe	
Suzie	Rowe	
P	Rowland	
Adam	Rowlands	
Jon	Rowles	
Trevor	Rowntree	
Trevor	Rowntree	
	Rudland	
Marcin	Rusiecki	
Judith	Rutherford	
Hap & Jerilynn	Russell	
Mary	Russell	
Stephen	Russell	
S A	Sampson	
M.	Sandeman-Prior	
Paul	Sanders	
Graham	Sanderson	
Ella	Sanders Smith	
Ann	Sandford	
Stephanie	Saul	
W.	Savage	
B	Sayre	
A	Scarlett	
Britta	Scharf	
Paul	Schofield	

Hannah	Scullion	
A	Sedgwick	
Phoebe R	Seilin	
John	Semple	
Sanjay	Sen	
Sally	Serkovich	
Theodore	Serkovich	
Alice	Shackleton	
M	Shaer	
Hashan	Sharif	
	Sharman	
Pat	Shaw	
L	Shepherd-Good	
Avinash & Ewa	Shah	
	Shanks	
Samantha	Shailer	
Rose	Sharp	
Eliza	Shaw	
Gloria	Shearer	
John	Sheppard	
Terry Peter	Sheppick	
John Richard	Sheridan	
R & S	Sherwood & Sainty	
Tony	Shoebridge	
Frank	Siebert	
Christopher	Simmons	
Marcus	Simmons	
Claire	Simpson	
Philip	Simpson	
Margaret	Simpson	
Graham	Sims	
M A A	Sinclair	
Robin	Sinclair	
Namrita	Singh	
Ruth	Skilkeller	
Karen	Skipper	
	Skipper	
Emma	Slessenger	
Karl	Sloan	
Pamela	Sloan	
Felicity	Smart	
Alan	Smith	
Jeff	Smith	
Mary	Smith	
Michelle	Smith	
Anna	Smith	
Dennis B.	Smith	
Graham FW	Smith	
Howard	Smith	
Joyce	Smith	

Karl	Smith	
M	Smith	
Matthew	Smith	
Peter	Smith	
Robert	Smith	
Stella	Smith	
Tove	Smith	
Wendy	Smith	
Jeremy	Smithers	
Bartle	Smith Smudge	
Clare	Snowdon	
Jack H	Sogan	
Lucy	Soleri	
Olivier	Somenzi	
Joanne	Sowells	
David	Sox	
Carol	Spekes	
Melanie	Spencer	3rd Teddington Scout Group
P A	Spielman	
Martyn	Spong	Academy Director Kingston College
Andrew	Sprey	
P	Squire	
Philip	Squire	
Tamsin	Sridmara	
	Stafford/ Patten	
Elizabeth	Staines	
Eleanor	Stanier	
Roger	Stanley	
Sheila	Stanley	
Raymond	Stead	
Brenda	Stenhouse	
Susan	Stevens	
Caroline	Stack	
Andrew	Stancer	
Robert	Steer	
C	Stephens	
Patricia	Stephens	
Mary	Stephens	
Jamie	Stewart-Liddon	
Dominic	Stockford	
Geoffrey	Stone	
M	Stone	
Emma	Story	
	Strobel	
P	Stubbing	
Larissa	Suchecka	
Leslie	Sullivan	
Catherine	Sumpter	
Danis	Suphi	
Andy	Sutch	

Anthony	Swan	
Jane	Sweetman	
Mark	Szutenberg	
Carole	Tait	
Jeff	Talbot	
Graeme	Tallantire	
Saime	Tanzi	
Rebecca	Taplin	
Jane	Tarbuck	
Andy	Taylor	
David	Taylor	
David	Taylor	
Denise	Taylor	
Lisa	Taylor	
M C	Taylor	
Winston	Taylor	
Dianne	Tempest	
	Templeman	
Shelley	Templeman	
John Dennis	Terry	
Stephen & Margaret	Tester	
	Thakrar	
Sebastien	Thelu	
Timothy Michael	Thomas	
G	Thompson	
Liz	Thompson	
Alison	Thomson	
Mary	Thorp	
Celia	Till	
Brian	Timbrell	Director/Trustee FiSH Neighbourhood Care
Charles	Titcombe	
Margaret	Tobback	
Chris	Toop	
C Y	Toop	
Gordon	Torp-Peterson	Kew Residents Association and Resident
Michael	Tothill	
James	Tovey	
Alistair	Trotman	
R I	Trudgett	
Kwun Teng	Tsang	
Philip	Tucker	
Charlotte	Tudor	
James	Tullo	
Neroli	Tullo	
Richard	Turk	
Marie	Turkheim	
G	Turnor	
Anthony	Tyrer	
Neill	Tughan	
Sarah & Mike	Turnbull	

Peter	Udell	
Colin	Umney	
Denise	Umney	
Martin	Valler	
Lucinda	Vanderhart	
Adriadne	Van de Ven	
Charlotte	Vang Gregersen	
Teresa	Vanneck-Surplice	
Joyce	Veasey	
Paul	Velluet	
Margaret	Venables	
Judge	Vera	
Caroline	Vimont	
Peter	Vincent	
M	Vinograd	
Dinesh	Vitharanage	
R	Vyas	
Chris	Cann	
John	Wade	
Natasha	Waithe	
David	Walch	
Maura	Wall	
William & Charlotte	Wall	
Andrew	Wallace	
Dilys	Walker	
Maria	Walker	
	Walker	
Bill	Walters	
Ian	Walton	
Ken	Ward	
Louise	Ware	
R	Ware	
Jennie	Waring	
Doreen	Warner	
Kate	Warren	
Richard	Warren	
Alana	Washington	
Liz	Waters	
N I C	Waters	
John	Watson	
Loretta	Watson	
Jonathan	Wax	
John	Webb	
Stephen	Webb	
Andrew	Weeks	
Leslie	Welch	
Moira	Welch	
Paul	Wenham	Member: Whitton Business Association
RJ	Wesley	
Victor & Lesley	West	

T.J.M	Weston	
Rodger	Wheeler	
Eve	Whitby	
Nicola	Whitby	
Frank	White	
Michael	Whitham	
Wendy	Whitham	
Jane	Whitworth	
John	Watson	
Andrew	Whitehead	
John	Whittall	
Chris	Whittome	
Phillip	Wilkins	
Tracy	Wilkins	
Anthea & Philip	Wilkinson	
Michael	Wilkinson	
Bryan	Williams	
C	Williams	
J	Williams	
Janet	Williams	
Michele	Williams	
R E	Williams	
Rik	Williams	
Simon	Williams	
Susan	Williams	
A.M.S	Wilson	
Roger	Wilson	Roger Wilson Consulting LLP
T	Wilson	
Neil	Wilton	
Simon	Wojtowicz	Hurlington Capital Ltd
David	Wood	
Elizabeth	Wood	
Martin	Wood	
Patrick	Wood	
Susan	Woodbridge	
David	Woodcock	
Geoff	Woodhouse	
Bryan	Woodriff	
Maria	Woodroffe Seale	
Margaret	Woolmore	
Mark	Worledge	
Terence	Worster	
Sandra	Worth	
Caroline	Wren	
Chrissie	Wrench	
P	Wynn	
David and Patricia	Yates	
Lorna	Yates	
Mark	Yates	
Kazuz	Yoshikawa	

George	Young	
M	Young	
R	Young	
Hastaran	Zamanpour	
Vivien	Zyms	
T	Pierson	
Landowners including schools		
Faisal	Aziz	
Tim	Burrow	A2Dominion
		Amida Club
Adrian	Corke	Bishop Perrin CE Primary School
		BNP Paribas Real Estate (on behalf of Royal Mail Group Ltd)
		Chase Bridge Primary School
Lindsay	Brodin	Collis School
Laura	Whateley	Darell Primary School
Mat	Goad	David Lloyd (Hampton)
		David Lloyd (Hampton)
Ian	Anderson	Lichfields on behalf of David Lloyd Leisure Ltd (David Lloyd)
Louise	Spalding	Defence Infrastructure Organisation (DIO)
Nigel	Spears	Diocese of Westminster
		English Heritage
		Fulwell Golf Club
Ben	Leek	GOLDCREST LAND PLC
		Ham & Petersham RifleClub
Steve	Hawkes	Hamilton Motor Factors Ltd
		Hampton and Petersham Football Club
Kevin	Knibbs	Hampton School
Nick	Hornsey	Hampton & Richmond Football Club
	Houston-Boswell	Hampton Court House
John	Barnes	Hampton Court Palace
Gerald	Knight	Harlequins
		Harlequin Football Club Ltd
Henry	Cox	Harlequin FC
Richard	Ward	DP9 Ltd on behalf of Harlequin Football Club Limited
Vincent	Gabbe	VRG Planning on behalf of Harlequin Football Club Limited
		Harrodian School
		Haymarket Media Group
		Heathfield Children's Centre
Debbie	Warner	Heathfield Children's Centre
Paul	Clayton	Heathfield Junior School
	Ms B Underwood	Heathfield Nursery and Infant School
Mark	Connell	Sphere25 on behalf of Hill Residential
Sue	Whittaker	Historic Royal Palaces
		Historic Royal Palaces
		Kerswell Hall
		Kew College
Richard	Deverell	Kew Gardens
Melanie	Gurney	The Planning Lab, on behalf of the Royal Botanic Gardens

Lindsay	Egner	The Planning Lab, on behalf of the Royal Botanic Gardens
Rachel	Purdon	Royal Botanic Gardens
Georgina	Darroch	Royal Botanic Gardens
Paul	Denton	Royal Botanic Gardens
Seena	Mistry	Royal Botanic Gardens
Ciara	O'Sullivan	Royal Botanic Gardens
Jem	Peck	Kew Green Prep School
Michael	Dillon	Kew Riverside Primary School
Mark	Turner	King's House School
Heather	Hanbury	Lady Eleanor Holles School
		Lensbury Club
		London Borough of Hammersmith & Fulham
		London Borough of Hounslow
Efua	Dadze-Arthur	London Diocesan Fund
Alison	Smith	DP9 Ltd
Charlotte	Orrell	DP9 Ltd on behalf of London Square Developments
		London Welsh R.F.C
		London Welsh RFU
		London Wetland Centre
		London Wildlife Trust
		Nelson Primary School
		Newland House School
Matthew	Parish	NHS Property Services
Nicholas	Grundy	Partner, Park Road Surgery
Emma	Nicholls	Park Road Surgery
		Chairman, The Hearsam Collection
		Petersham Nurseries
George	Voss	WSP on behalf of Petersham Nurseries Ltd
Robert	Cook	Radnor House
Christina	Conroy	Richmond Adult and Community College
Tony	Hallett	Chairman of Richmond Athletic Association
Jimmy	Wallace	Richmond Athletic Association
		DP9 on behalf of Richmond Athletic Association
Dean	Sutcliffe	RFU
Chris	Donnelly	RFU
Mark	Lynch	RFU
David	Done	Richmond Housing Partnership
Rob	Cummins	Richmond Housing Partnership
Sadie	Wykeham	Roberts & Wykeham Films Ltd
		Roundlistic Limited
		Royal Botanic Gardens Kew
		Royal Mail Group
Ugne	Staskauskiate	Cushman & Wakefield on behalf of Royal Mail Group
		Royal Mid-Surrey Golf Club
		Kneller Hall
		Royal Parks
Darren	Woodward	Royal Parks
Theresa	Oddelm	Royal Parks
		Rugby Football Union (RFU)
		Sainsbury's

Anna	Stott	WSP on behalf of Sainsbury's
Sophie	Hockin	WSP on behalf of Sharpe Refinery Service Limited
Anna	Russell-Smith	Montagu Evans on behalf of South West London and St George's Mental Health NHS Trust
David	Ansell	Richmond upon Thames College
Henry	Courtier	Pegasus Group on behalf of Sheen Lane Developments
Paul	Mundy-Castle	Shene School
Joanne	Merritt	Stanley Primary School
		St Catherine's Catholic School
Carmel	Moreland	St Edmund's Catholic Primary School
Frances	Soiza	St Edmund of Canterbury Church
		St Mary's University College
Chris	Paget	St Mary's University
Gavin	Hindley	St Mary's University
Maxine	Shaw	St Paul's Juniors
Hugh	Muirhead	St Paul's School
David	Cloake	St. Philip & James Church
Kate	Woodhouse	St Mary's Mortlake Church
		Southwark Diocesan Board of Education
		Strawberry Hill Golf Club
		Surrey County Council
Ian	Thompson	Teddington Tennis Grounds Ltd
Francesca	Jordan	Thames Valley Housing
Marie-Luise	Balkenhol	The German School
		The Mall School
Bill	Goldup	The National Archives
Katie	Bentham	The Queen's CE Primary School
Carmelle	Bell	Thames Water Property
Christopher	Collof	Thames Water Utilities Ltd
		The Crown Estate
		The Lady Eleanor Holles School
		The National Trust - London and South East
Lisa	Lamb	The National Trust - London and South East
Katy	Wiseman	The National Trust - London and South East Region
J G	Mitchell	The Royal Ballet School
A L	Loof	The Swedish School
		Trafalgar Infants School
Nick	Jones	Twickenham Academy
		Twickenham Park Golf Centre
M.D.	Malam	Twickenham Preparatory School
		Twickenham Rifle Club
Keith	Mower	Twickenham Rifle Club
		Twickenham United Reform Church
Sam	Twiston Davies	Tyton Properties Ltd
		Wildfowl and Wetlands Trust
Richard	Steer	Richard Steer & Co.
		Unicorn School
		Waitrose
		Wellington Holdings
Gordon	Hindmarch	Whitton Baptist Church

D	Rampley	Whitton School Association
Kim	Hawkins	Wingold Ltd
Developers/Agents including those who submit planning applications		
		3Fox International Ltd
		3S Architects LLP
Alistair	Grills	Alistair Grills Associates
		AMG Planning
		Andraos Associates
Andrew	Catto	Andrew Catto Architects
		Anglian Home Improvements
		Angus Brown Architects
Hugo	Tugman	Architect Your Home
		Architect Your Home
		Architecture WK Ltd
		Attic Conversions
		Bancil Partnership
		B Berlemont
Joe	Day	Bellway Homes Limited (South London)
Bob	Trimble	Bob Trimble Architects
		Building Plans
		C D Martin
R G	Young	C. G. & W. Young Ltd
		C M Martin
		Carter Fielding Ltd
		Charles Doe Architects
Barry	Kitcherside	CHART PLAN LTD
		Chris Lawes (Architect)
		Clive Chapman Architects
		Courtleas Consulting Ltd
		Cunnane Town Planning
		David Lock Associates
		David Clarke Associates
		Derek Plummer
		Double H Loft Conversions
Murray	Smith	Dunphys Chartered Surveyor on behalf of St. Clare Business Park
		Englishhaus Ltd
Raj	Patel	FDR Architects
		Fine Line Designs Ltd
Faye	Wright	Forward Planning + Development on behalf of BMO Real Estate
William	Luck	George Wimpey West London Ltd
		GPS Architects
		RAA Architects
		Graham Hatt Associates
John	Carter	Hawks Meadow Properties Ltd
		HTA Design LLP
		HTP Architecture Llp
		Hazan Smith Partners
		Ian Finlay and Associates
		IID Architects

		Indigo Planning
Peter	Dowling	Indigo Planning OBO Sainsbury's Supermarkets Ltd
George	Burgess	Indigo Planning OBO Beechcroft Developments Ltd.
Cathryn	Smith	WSP Planning
		Indigo Planning Limited on behalf of Ashill Land Limited
Nicola	Dawe	Indigo Planning on behalf of Arlington Works incl Sharpe Refinery Service
Phil	Villars	Indigo Planning Limited on behalf of Shepherd Enterprises Limited
Phil	Villars	WSP
James	Doddrell	James Doddrell Architects
		JWP Project Management
		John Bennett
		John Phillips
		John Rawlins
		John Rich Architects Ltd
Athena	Young	John Rich Architects Ltd
		Johnston And Mather
Nicholas	Pryor	The JTS Partnership LLP
		Judy Giddings
Katharine	Woods	KMW Developments
		Lawford Associates
Philip	Allin	Boyer Planning
		Boyer Planning
		Boyer Planning
		Loft Rooms.Co.Uk Ltd
Claire	Tyne	MAA Architects
		Malcolm Watton
		Martin Butler Partnership LTD
John	Matuszewski	Martin Grant Homes
Richard	Woolf	McDaniel Woolf Architects
		Michael Jones Architects
		Montagu Evans LLP
Sam	Stackhouse	Montagu Evans LLP
Tom	Pemberton	Montagu Evans LLP
		Mr G P Browne
		Mr M. Vierke
		Mr P D Knight
		Mr Shiraz Riaz - Everest LTD
		Mr Tim Houlihan
		Ms Grainne O'Keefe
		Norman Ullathorne
		Patel Taylor Architects
		Paul Brookes Architects
		Paulley Architects
		Redmond Ivie Architects
Andrew	Munton	Reside Developments Ltd
		Richard Ewen Architects
		Richmond Architectural
		RPS Group PLC
		S. F. Scaffardi

		Shaw and Company Chartered Surveyors
		Simon Merrony Architects
		Stephen Reyburn Architects
		Tegwynne Goldthorpe
		Terence Kearney Architects
		Tesni Properties Limited
Laura	Moore	Thakeham
		The Louis De Soissons Partnership
		Think Design
		Top Flight Loft Conversions
		Tuffin Ferraby Taylor
		Tugman Architects
Paul	Velluet	Chartered Architect on behalf of Old Deer Park Working Group
		Wallace Wheating
Commercial agents		
Brian	Madge	Brian Madge Ltd
Richard	Eves	Eves Commercial
Andrew	Weeks	Featherstone Leigh Commercial
Simon	Levene	Levene Chartered Surveyors
Michael	Donaldson	Marquis & Co
		Martin Campbell
Dominique	Arthur	Martin Campbell
Niall	Christian	Michael Rogers LLP
		Michael Rogers LLP
Mike	Martin	Milestone Commercial
Jay	Stallard	Milestone & Collis
Antony	Robson	Milestone & Collis - Professional Services
Charles	Tapson	Property Facets Ltd
Sharon	Bastion	Sneller Commercial
Kimberley	Lucas	Sneller Commercial
Consultants - Planning, Sustainability, Legal firms etc.		
David	Armstrong	Armstrong Planning
David	Alabi	AATP
Louise	Hatchett	Adams Hendry Consulting Ltd.
		Alexander Reece Thomson
Alistair	Grills	Alistair Grills Associates
Bree	Day	Architech
		Arcus Consultancy Services Ltd
Geoff	Armstrong	Armstrong Rigg Planning
Lynsey	Rigg	Armstrong Rigg Planning
Kelvin	Sutherland	Authentic Estates
Nick	Alston	Avison Young on behalf of St George Plc and Marks & Spencer
Rachel	Crick	Avison Young
		Avison Young
Mark	Knibbs	Avison Young
Laura	Jenkinson	Avison Young
Anna	Harrhy	Avison Young
		Avison Young
Daniel	Osborne	Barton Willmore on behalf of the Quantum Group

Greg	Pitt	Barton Wilmore on behalf of UK Pacific Hampton Station LLP
Paul	Newton	Barton Willmore on behalf of Quantum Group
Hannah	Leary	Barton Willmore
		Berkeley Group
Matt	Richards	Bidwells
Jo	Davis	GVA
Derek	Ching	Boyes Turner Solicitors
Anthony	Lee	BNP Paribas Real Estate
Alex	Willis	BNP Paribas Real Estate UK
		BNP Paribas Real Estate UK
James	Holmes	Aitchison Raffety
		Broadway Malyan
		Broadway Malyan
		Brooke Smith Planning
		Brooke Smith Planning on behalf of Ancient Order of Forester's Friendly Society
John	Miles	
Jonathan	Stobbart	CBRE on behalf of Laboratory of the Government Chemist
James	Sheppard	CBRE on behalf of CBREGI
James	Sheppard	CBRE OBO LGC Ltd.
Hannah	Blunstone	CBRE on behalf of Rugby Football Union (RFU)
Olivia	Russell	CBRE
Ziyad	Thomas	Planning Issues on behalf of Churchill Retirement Living and McCarthy Stone Retirement Lifestyles
		Colliers International on behalf of Greggs PLC
		Colliers on behalf of Greggs Plc
	Leek	Goldcrest Land
Karrie	Church	RPS Group
		RPS Group
Tarun	Cheema	Centro Planning Consultancy
		Cunnane Town Planning
		Cushman & Wakefield
		Dalton Warner Davis LLP
Emma	Penson	Dalton Warner Davis LLP - on behalf of Dukes Education and Radnor House School Limited
David	Clarke	David Clarke Associates
DE & J Levy LLP		DE & J Levy LLP on behalf of Mr Gerald Green
Nathan	Hiles	Deloitte LLP
R	Raftery	Metro Bank PLC
Laura	Ross	DevPlan
Sati	Panesar	DHA Planning & Development on behalf of Francis H Newman (Shipyards) Limited
Mark	Bewsey	DHA Planning
Alistair	Patterson	planinfo Research Team
Neil	Osborn	DLP
Frances	Young	DLP
Ian	Fergusson	Dominvs Group
		DPP
Philippa	Edwards	DP9
Olivia	Willsher	DP9 Ltd
Marlon	Deam	DP9 Ltd

Jake	Geczy	DP9 Ltd
		DP9
		Cushman & Wakefield
Edward	Landor	eLANDORassociates
		Elementa
Catherine	White	First Plan
Mike	Mills	FirstPlan Ltd OBO Maxicorp Ltd
		First Plan
Tim	Humphries	FirstPlan
Gary	Brook	Gerald Eve LLP
Charlotte	Gorst	Gerald Eve LLP
Peter	Dines	Gerald Eve
Neil	Henderson	Gerald Eve for Reselton Properties Ltd.
Kevin	Watson	Gerald Eve
Harry	Spawton	OBO Penney Limited
		Avison Young
Tim	Sturgess	GVA Grimley Ltd OBO Lady Eleanor Holles School
Rebecca	Bilfinger	GVA on behalf of Lady Eleanor Holles School
Laura	Jewell	Avison Young
		HGH Consulting
		Hoare Lea Sustainability
		Hodkinson
Norma Jean	Worden-Rogers	Indigo Planning
James	Lloyd	James Lloyd Associates Ltd
		Jones Lang LaSalle
Kevin	Scott	Solve Planning (on behalf of Port Hampton Estates Limited)
Kevin	Scott	Kevin Scott Consultancy on behalf of Platts Eyott (Port Hampton Estates Ltd)
Emma	Gill	Knight Frank
Vincent	Gabbe	Knight Frank on behalf of Metropolitan Police Service
Mary-Jane	O'Neill	Lambert Smith Hampton
		Lambert Smith Hampton
Graeme	Thorpe	Leith Planning Limited
David	Maddox	Maddox & Associates
		Marrons Planning
Simon	Marshall	Marston Properties Ltd
Nadia	Hepburn	Montagu Land Ltd
		My Neighbourhood Plan
James	Fennell	Nathaniel Lichfield & Partners on behalf of Harrodian School
Helena	Taylor	Lichfields on behalf of The Harrodian School
Julie	Williams	Nathaniel Litchfield & Partners
Pauline	Roberts	Lichfields on behalf of West London Mental Health NHS Trust
Neil	Goldsmith	Nathaniel Lichfield & Partners on behalf of St Mary's University
Katie	Brown	Nathaniel Lichfield & Partners on behalf of St Mary Unviersity
Tor	Barrett-Mudhoo	Nathaniel Lichfield & Partners on behalf of the West London Mental Health NHS Trust
		Lichfields

Simon	Slatford	Lichfields
Judith	Livesey	NLP Planning on behalf of St Paul's School
Meghan	Allen	NTR Planning Ltd
Catherine	Ramsden	Useful
Adam	Leadercramer	On-side Law
Benjamin	Elsdon	Paper Project architecture + design
Paul	Dickinson	Paul Dickinson Associates
		Peacock and Smith
Abbie	Clark	Plainview Planning Ltd
		Planning Potential Ltd
Sally	Arnold	Planning Potential Ltd obo Paddy Power
		Planning Potential Ltd
		Planning Potential Ltd
Sam	Elliott	Planning Potential Ltd
		Progress Planning
Stephanie	Weeks	Carter Jonas
Hannah	Wallis	Carter Jonas
Sam	Hobson	Quantum Group
Charlotte	Williams	Quod
Ben	Ford	Quod
Adam	Cornish	Quod OBO Travis Perkins Plc
		Carter Jonas
Chloe	Brown	Carter Jonas
Mike	Anderson	Planware Ltd
Benjamin	Fox	Planware Ltd obo McDonald's Restaurants LTD
Erik	Peterson	Poole Consultants Ltd
		PowerHaus Consultancy
Harriett	Young	Powerhaus Consultancy
Vicky	Thomas	Quod (on behalf of Berkely Group)
		Rapleys LLP
Jason	Lowes	Rapleys LLP
Angus	Irvine	Rapleys LLP
Katie	Adderly	Renewables UK
Gemma	Grimes	Renewables UK
		RES
Darren	Carroll	Richard Coleman City Designer
Daniella	Marrocco	ROK Planning on behalf of Shurgard UK Ltd
Ian	Barnett	Romans Land and Development
		RPS (on behalf of Costco Wholesale)
Richard	Boother	RPS (on behalf of Mr and Mrs Oxley)
Nicholas	Hayward	RPS Group (on behalf of RFU)
Karrie	Church	RPS on behalf of richmond college
Jake	Tubb	RPS on behalf of richmond college
Richard	Lemon	SAV Group
Catherine	Mason	Savills OBO Thames Water Authority
Chloe	Powell	Savills
James	Yeoman	Savills (L&P) Limited
Tom	Faber	Savills
Jake	Ash	Savills
		Thames Water Property

Neil	Rowley	Savills obo Thames Water (sites)
Hannah	Millman	SF Planning
James	Shelton	Shelton Hawkins Architects
Rob	Shrimplin	Shrimplin Planning & Development on behalf of CLS Holdings
Nick	Jenkins MRICS	Smith Jenkins
Malcolm	McClellan	SRE
		SRE Ltd
Mark	McGovern	SSA Planning Limited
Steve	Simms	SSA on behalf of Kentucky Fried Chicken (Great Britain) Limited
		St George Plc
James	Hadden	Stiles Harold Williams Partnership LLP
		Stiles Harold Williams Partnership LLP
David	Gilchrist	St James Group Ltd
Simon	Lewis	St James Group Ltd
Jess	Duncan	St James Group Ltd
John	Cutler	Strutt and Parker
Tracy Ann	Scanlan	Tetlow King
Joseph	McDonald	Tetlow King Planning
		Tetlow King Planning
		Terence O'Rourke
Nicola	Gooch	Thomas Eggar LLP on behalf of Asda Stores
		Troy Planning + Design
Sid	Hadjoannou	Turley Associates
		Turley Associates
		Turley Associates
Alex	Christopher	Turley Associates for British Land
Richard	Brookes	Turley Associates on behalf of Holt Construction Ltd
Lauren	Weimar	Bidwells LLP
Chris	Pattison	Bidwells LLP
Chris	Winch	UK Power Networks
Sophie	Matthews	Walsingham Planning
Gavin	Cooper	Walsingham Planning
Stephen	Brooker	Walsingham Planning on behalf of Whitbread Plc
Thomas	Rumble	Woolf Bond Planning
Michael	Wellock	Kirkwells
		Framptons
		GL Hearn
Christopher	Tennant	GL Hearn
Retail and business associations		
Andrew	Wilson	Barnes Traders Association
Bruce	Lyons	Church Street Association
Perminder	Tamana	East Twickenham
Pauline	Lee	Friars Stile Road Traders network
Paul	Cummins	Friars Stile Road Traders network
		Ham and North Kingston Community Investors (CIC)
Isolde	O'Kane	Hampton Hill Business Association
Caroline	Badgery	Hampton Village Traders Association
Sharon	Bastion	Hampton Wick Association
Roland	Goslett	Kew Traders Association

Mia	Wood	Kew Traders Network
Sara	Novakovic	Kew Station Parade
Jessica	Lloyd	Kew Traders Network
		Richmond BID
Jackie	Upton	Sheen Traders Network
Adam	Tocock	St Margerets Traders Association
Stephen	Gardiner	St Margerets Traders Association
Mark	Martin	Teddington Business Community
Annie	Moore	Teddington Business Community
Alison	Davey	Teddington Business Community
		Teddington Business Community
Bhavna	Patel	Teddington Traders Network
John	Austin	Twickenham Town Centre Board
Natasha	Heaphy	Twickenham BID
Graeme	Wood	Whitton Business Association
Graeme	Wood	Whitton Business Association
Bridget	Clements	Whitton Business Association
		Whitton Network

Environment and Community Services
Andrea Kitzberger-Smith
Planning Policy and Design Team Manager
Phone: 020 8891 1411
Email: LocalPlan@richmond.gov.uk

24 February 2020

[Enter 1st line of name and address here]
[Enter 2nd line of name and address here]
[Enter 3rd line of name and address here]
[Enter 4th line of name and address here]
[Enter 5th line of name and address here]

Dear Consultee,

**London Borough of Richmond upon Thames – Local Plan Direction of Travel
consultation and Call for Sites – 24 February to 22 March 2020**

We are developing a new Local Plan, which is the key planning document for the borough. It will set out policies and guidance to plan and manage future growth and development in the borough over a 15-year period. Once adopted, the Plan will supersede the existing Local Plan (2018) and the Twickenham Area Action Plan (2013). It will be the main document against which planning applications are assessed.

Why do we need a new Plan

While elements of the 2018 Local Plan are still relevant, the Council has declared a climate emergency last summer, and planning policies need to reflect and actively address this issue. The borough is also facing increased housing targets, and the population is changing, so there is a need to plan for new homes together with the necessary infrastructure to support growing communities. In addition, there have been changes to national planning policies and guidance that the Local Plan must reflect.

What is a Direction of Travel

The Direction of Travel document is the first stage in the engagement process with residents, business and other stakeholders on what our vision for growth and future development should be. The borough is facing a number of key challenges, opportunities and critical planning issues. This document sets out what we think they are, and how they could be included in a new Local Plan.

This is an additional stage of consultation that is not prescribed by legislation. We want to hear your views as to how the borough should accommodate growth and plan for new development. Please tell us if you agree, or if we have missed any opportunities or issues you think need to be addressed in the new Plan. We have included a number of questions throughout the Direction of Travel document, which we hope will help you in responding.

Alongside the Direction of Travel, there is a 'call for sites' consultation, the purpose of which is to identify what land may become available during the Local Plan period. In addition, the Council is also seeking comments on the revised Sustainability Appraisal Scoping Report.

Where to view the documents and how to respond by 22 March 2020

The documents can be viewed as follows:

- Read the consultation material online at:
www.richmond.gov.uk/new_local_plan_direction_of_travel_engagement
- View the consultation material at the Civic Centre, 44 York Street, Twickenham, TW1 3BZ and in the Borough's main libraries

Please contact us should you have problems accessing or printing the documents.

You can respond, to some or all of the questions, by:

- Completing the **online questionnaire** at
<https://haveyoursay.citizenspace.com/richmondecsl/local-plan-20>
- **email** to **LocalPlan@richmond.gov.uk** or
- **post** to Policy and Design, LB Richmond upon Thames, Civic Centre, 44 York Street, Twickenham, TW1 3BZ

We would prefer all comments to be made electronically. Please note that the **deadline for comments is Sunday 22 March 2020**, and responses will not be treated as confidential.

What happens next

There will be further engagement opportunities to inform and shape the new Local Plan later in 2020. Next year, there will be statutory consultations on draft versions of the Plan, and, following an independent examination in public, the Local Plan is anticipated to be adopted in 2024.

Update on legal challenges of Local Plan (2018)

Mr Paul Griffiths BSc (Hons) BArch IHBC, a Planning Inspector appointed by the Secretary of State, has issued his report with respect to (1) Other Open Land of Townscape Importance at St Michael's Convent, Ham Common; and (2) the Local Green Space designation at Udney Park Playing Fields, Teddington. The Council has published the Inspector's report on 12 February 2020, which is available on the Council's webpage www.richmond.gov.uk/local_plan_examination#legal

The Inspector concluded that the disputed section of the garden at St Michael's Convent should be included as Other Open Land of Townscape Importance, and that Udney Park Playing Fields does warrant the Local Green Space designation. The report on the outcomes of the redetermination and the adoption of the Plan in respect of the above two matters only will be considered at a meeting of Full Council on 3 March 2020.

You have received this notification as you have previously engaged with the Richmond Planning Policy and Design team or we have identified you as a stakeholder. The General Data Protection Regulation (GDPR) is a set of European Union (EU) regulations which came into force on 25 May 2018. The Council is committed to ensuring that personal data is processed in line with the GDPR data protection principles including keeping data secure, and that it will not be shared with any other organisation. The Council's Privacy Notice is published on the webpage www.richmond.gov.uk/data_protection. We hope that you or your organisation will continue to take an interest in, and contribute to, future planning policy and design policy. If you'd like to continue hearing from us, then you do not need to do anything to respond to this. If, however, you would prefer not to receive notifications regarding planning policy and design matters from us, then please notify us, preferably by email to LocalPlan@richmond.gov.uk.

Yours faithfully

Andrea Kitzberger-Smith
Planning Policy and Design Team Manager

Appendix 2B to the Statement of Consultation: Direction of Travel - details on the website

Customer notice

We are currently experiencing issues with the Richmond Account. We apologise for any inconvenience this may cause.

New Local Plan Direction of Travel engagement

We are now starting to prepare a new Local Plan for Richmond borough which will replace the current Local Plan and Twickenham Area Action Plan. This page is for the first stage of early engagement seeking your views.

About the new Local Plan

The Local Plan is the key planning document for the borough. It sets out policies and guidance to shape our places, plan and manage growth and guide development across the borough over a 15-year period.

We will use the Local Plan to guide our decisions on the location, amount and type of development the borough needs to accommodate growth. It will also set out which places will be protected, and which places will change. Ultimately, the Local Plan is the main document against which planning applications are assessed.

In the last two years there have been changes to national planning policy and the new London Plan is in its final stages before adoption and will affect housing targets. The Council has adopted a Climate Emergency Strategy with a range of actions some of which have a direct bearing on Local Plan policies, as will other changes to the environment and economy.

About this consultation from Monday 24 February to Sunday 22 March 2020


The Direction of Travel document is the first stage in the engagement process with residents, business and other stakeholders on what our vision for growth and future development should be.

The borough is facing a number of key challenges, opportunities and critical planning issues. This document sets out what we think they are, and how they could be included in a new Local Plan.

This is an additional stage of consultation that is not prescribed by legislation. We want to hear your views on how the borough should accommodate growth and plan for new development. Please tell us if you agree, or if we have missed any opportunities or issues you think need to be addressed in the new Plan. We have included a number of questions throughout the Direction of Travel document, which we hope will help you in responding.

Alongside the Direction of Travel, there is a 'call for sites' consultation, to identify what land may become available during the Local Plan period. The Council is also seeking comments on the revised Sustainability Appraisal Scoping Report.

Direction of Travel Consultation

View the [Direction of Travel consultation](#). You can also read a [summary leaflet](#)  (pdf, 1.1 MB) first.

Paper documents are also available to view at all [borough libraries](#) and at the [Civic Centre in Twickenham](#).

You can respond, to some or all of the questions, by 22 March 2020:

Completing the [online questionnaire](#)

Email to LocalPlan@richmond.gov.uk or

Post to Policy and Design, LB Richmond upon Thames, Civic Centre, 44 York Street, Twickenham, TW1 3BZ

We would prefer all comments to be made electronically, ideally through the online questionnaire. Please note that the deadline for comments is Sunday 22 March 2020, and responses will not be treated as confidential.

Call for Sites

The Council is required by Government to issue a call for sites and broad locations for development as part of the preparation of the new Local Plan. This is to identify as many potential opportunities as possible, aimed at as wide an audience as possible so that those not normally involved in property development have the opportunity to contribute.

This is happening alongside the Direction of Travel consultation, so we will have a better understanding, at this early stage in preparing the Plan, what land may become available during the Local Plan period and an understanding of deliverability.

Please note that the 'call for sites' exercise does not mean the Council will have to allocate the suggested sites for development, but the Council will be able to assess from a potentially large number of sites their suitability, availability and deliverability.

You (individuals, landowners, developers, businesses, local groups) are invited to put forward sites for consideration. The information you need to submit is set out within the Direction of Travel Consultation (as detailed above), or these can be submitted separately by:

Completing [the online questionnaire](#)

Email: LocalPlan@richmond.gov.uk

Post: Policy and Design, LB Richmond upon Thames, Civic Centre, 44 York Street, Twickenham, TW1 3BZ

Draft Sustainability Appraisal Scoping Report

The purpose of Sustainability Appraisal is to consider the likely social, environmental and economic impacts of the emerging plan, it also incorporates the requirements of the Strategic Environmental Assessment (SEA). As part of the preparation of a new Local Plan, the Council has reviewed and updated its draft Sustainability Appraisal Scoping Report (February 2020), which identifies the scope and level of detail of the information to be included in the Sustainability Appraisal.

The Council is seeking views on the draft report from the three statutory consultees with environmental responsibilities in England (Historic England, Natural England, and the Environment Agency). Other relevant stakeholders with a sustainability remit or a local interest are also able to review the report and submit representations.

View draft revised of the [Sustainability Appraisal Scoping Report](#)  (pdf, 2.7 MB)

After the consultation

There will be further engagement opportunities to inform and shape the new Local Plan later in 2020. The timetable for the preparation of the new Local Plan, including the further statutory consultations and stages towards adoption in 2024, are set out in the [Local Development Scheme](#).

A summary of the responses will be made available following the consultation period. These responses will be fully considered and taken into account when preparing the Plan.

Contact

Email: localplan@richmond.gov.uk

Updated: 24 February 2020

Public Notices

**LONDON BOROUGH OF RICHMOND UPON THAMES
DIRECTION OF TRAVEL AND CALL FOR SITES
FOR NEW RICHMOND LOCAL PLAN**

The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended)

Public Notice to invite comments on the Direction of Travel document for the new Local Plan, together with a call for sites consultation

Public consultation: 24 February to 22 March 2020

We are developing a new Local Plan, which is the key planning document for the borough. It will set out policies and guidance to plan and manage future growth and development in the borough over a 15-year period. Once adopted, the Plan will supersede the existing Local Plan (2018) and the Twickenham Area Action Plan (2013). It will be the main document against which planning applications are assessed.

Why do we need a new Plan?

While elements of the 2018 Local Plan are still relevant, the Council has declared a climate emergency last summer, and planning policies need to reflect and actively address this issue. The borough is also facing increased housing targets, set by the Mayor of London, and together with the rising population, there is a need to plan for new homes together with the necessary infrastructure to support growing communities. In addition, there have been changes to national planning policies and guidance that the Local Plan must reflect.

What is a Direction of Travel?

The Direction of Travel document is the first stage in the engagement process with residents, business and other stakeholders on what our vision for growth and future development should be. The borough is facing a number of key challenges, opportunities and critical planning issues. This

The document applies to the whole borough and has been prepared in accordance with the Planning and Compulsory Purchase Act 2004 (as amended) and Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended). Note the Area Action Plan (AAP) for Twickenham, which was adopted in 2013, will be superseded by this new Local Plan. However, the Ham and Petersham Neighbourhood Plan (2019) and the West London Waste Plan (2015) will remain as existing.

document sets out what we think they are, and how they could be included in a new Local Plan.

This is an additional stage of consultation that is not prescribed by legislation. We want to hear your views as to how the borough should accommodate growth and plan for new development. Please tell us if you agree, or if we have missed any opportunities or issues you think need to be addressed in the new Plan. We have included a number of questions throughout the Direction of Travel document, which we hope will help you in responding.

Alongside the Direction of Travel, there is a 'call for sites' consultation, the purpose of which is to identify what land may become available during the Local Plan period. In addition, the Council is also seeking comments on the revised Sustainability Appraisal Scoping Report.

Availability of consultation documents for inspection

- Read the consultation material online at: www.richmond.gov.uk/new_local_plan_direction_of_travel_engagement
- View the consultation material at the Civic Centre, 44 York Street, Twickenham, TW1 3BZ and in the Borough's main libraries

How to let us know your views

You can respond in the following ways by **22 March 2020**:

- By completing the **online questionnaire** at <https://haveyoursay.citizenspace.com/richmondccs/local-plan-20>
- By email to LocalPlan@richmond.gov.uk or
- By post to Planning Policy, LB Richmond upon Thames, Civic Centre, 44 York Street, Twickenham, TW1 3BZ

We would prefer all comments to be made electronically, ideally through the online questionnaire. Please note that the **deadline for comments is Sunday 22 March 2020**, and responses will not be treated as confidential.

What happens next?

There will be further engagement opportunities to inform and shape the new Local Plan later in 2020. Next year, there will be statutory consultations on draft versions of the Plan, and following an independent examination in public, the Local Plan is anticipated to be adopted in 2024.

Andrea Kitzberger-Smith
Planning Policy Manager

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Appendix 2D to the Statement of Consultation: Direction of Travel - Press release

Richmond residents and businesses invited to shape future of the borough

Release Date: 21 February 2020

Work has begun to prepare a new plan that outlines how future development will create the 'best for our borough'.

The Local Plan is the key planning document for the borough. It sets out the policies and guidance that shape our places, plan and manage growth and guide new development across the borough over a 15-year period.

The Council uses the Local Plan to guide decisions on the location, amount and type of development the borough needs to accommodate future growth. It also sets out which places will be protected and which places will change. Ultimately, the Local Plan is the main document against which planning applications are assessed.

The Council is in the very early stages of developing its new Plan. The views of residents, businesses, community groups and wider stakeholders are sought on the "Direction of Travel" for the new Local Plan. The Direction of Travel sets out the key challenges, opportunities and critical issues facing the borough.

Ten themes have been identified that will inform the new vision for growth in the borough. Responding to the climate emergency, the rising population and demands for new homes together with necessary infrastructure to support growth as well as delivering an affordable borough for all will be key priorities for the new Local Plan.

Over the next four weeks, from 24 February to 22 March, the Council is asking the local community, businesses and other stakeholders to help shape the new Local Plan by responding to the questions set out in the Direction of Travel. Views are sought on important areas such as town centre growth and changes in our high streets, ambitions around carbon emission reduction standards for new developments, encouraging the use of alternatives to the car, providing new affordable homes and much more.

Have your say

Cllr Martin Elengorn, Chair of the Environment, Sustainability, Culture and Sport Committee, said:

“In response to the accelerating pace of climate change and the rising population, we need to plan for our future.

“The Local Plan is effectively a blueprint for the borough’s future, covering everything, from where and how many new homes are needed so families can continue to live locally, to more schools and health provision to meet the needs of growing communities. It will also be key to shape the future of our high streets and town centres, in light of changes in shopping habits.

“Now is the time to help shape the future direction of growth and changes in the borough. The issues and challenges facing our borough will impact on the lives of everyone, whether you live or work here, so I hope that as many of you as possible will work with us. By planning for the future now, we can work towards a better borough for everyone.”

There will be further engagement opportunities to inform and shape the new Local Plan later in 2020. Next year, there will be statutory consultations on draft versions of the Plan, and following an independent examination in public, the Local Plan is anticipated to be adopted in 2024.



Consultation

Community Conversation

Notes for editors

If you are a journalist and would like further information about this press release, contact [Elinor Firth](#) on 020 8487 5159.

Reference: P057/20

Updated: 25 February 2020

Appendix 2E to the Statement of Consultation: Direction of Travel - Councillor Comment Spot

Setting out our priorities for the development of the borough

Date: Tuesday 18 February 2019

Author: Councillor Martin Elengorn

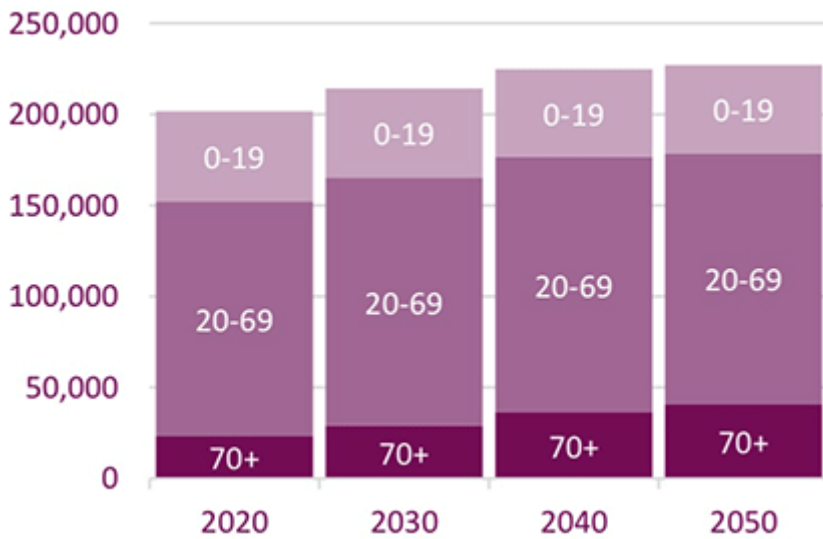
Title: Chair of Environment, Sustainability, Culture and Sport Committee



It is less than two years since the Council adopted the present Local Plan, (a strategy that sets out the priorities for the development of the borough, it is used for making decisions on planning applications). But since it was adopted much has happened. The Council now has a Climate Emergency Strategy with a range of actions some of which have a direct bearing on Local Plan policies. There has also been a revision of the National Planning Policy Framework and an emerging new London Plan with, amongst other things, increased housing targets, within which the achievement of the desired proportion of affordable accommodation remains elusive. Another major issue is that, although our town centres have so far proved more resilient than most to changes in shopping habits, we need to consider whether greater policy flexibility is desirable.

So, we are working towards the next Local Plan and, as a first stage, we are carrying out a consultation based on a Direction of Travel document.

Among the most important contexts are Borough population projections which show considerable growth, particularly among the over 70s.



Projected population growth in Richmond

We also have to think about those commuting both out of and into the borough.



Commuter movement in and out of the borough

So, these are just a very few of the questions we will be asking:

Which areas of the borough could take most growth, for example based on proximity to town centres and stations?

How ambitious should we be in requiring zero carbon standards for all developments?

Should Richmond and Twickenham be the appropriate locations for the majority of any new retail floorspace?

Should Café culture and the night time economy be encouraged. Should we be more flexible about change of use from retail to eating out? If so, where?

Is there more scope for further community uses in centres, potentially even in key retail areas?

Would housing (including residential on upper floors) work if located next to other (potentially noisy or smelly) uses in centres?

Should the amount of designated key shopping frontages be reduced and/or should secondary shopping frontages (where some change of use is already allowed) also be reduced or de-designated altogether?

Should we continue to protect local top-up shopping facilities?

How long should shops be marketed before a change of use is allowed if the proposal is contrary to policy?

What priority should we give to employment uses over residential amenity, if at all?

Are there any sites that should be designated as 'Local Green Space'?

Should we develop our own borough-wide design guide?

Should the Council actively pursue alternative uses (such as for much needed affordable housing) on its existing car parks?

There are many questions on which we're seeking your views. Our consultation on the Direction of Travel for the next Local Plan will be launching shortly. So, watch this space for more information. Remember to [sign up for our new Climate Change newsletter](#), which will include more information about what we are doing and what you could do to reduce our borough's carbon footprint.

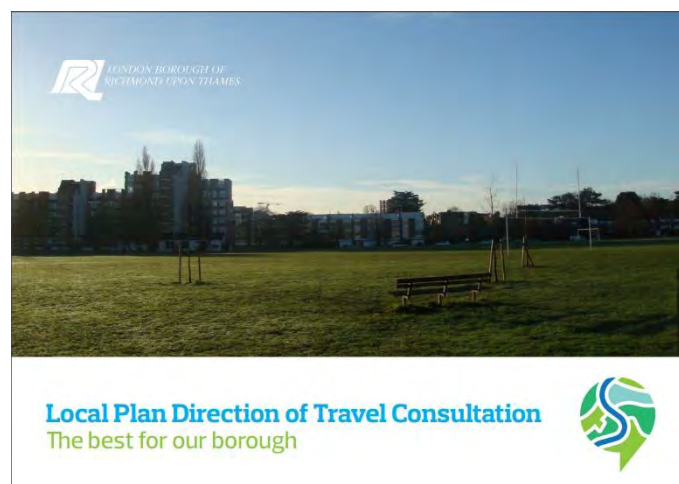
Updated: 18 February 2020



Local Plan Direction of Travel Consultation Responses

Planning

30 November 2020



About the consultation

The consultation was undertaken Monday 24 February to Sunday 22 March 2020.

The consultation on the [Direction of Travel](#) was accompanied by a [summary leaflet](#), and responses could be submitted through an online questionnaire, by email or post. There was also a Call for Sites (with a separate questionnaire) and statutory bodies were consulted on the Sustainability Appraisal Scoping Report which was also available for comment.

The consultation was extended to Sunday 5 April 2020 (as the Mayoral and London Assembly elections were postponed there was no purdah period, and due to the implications of COVID-19).

About the respondents

Comments were received from 88 respondents, some responded to more than one of the documents - comprising 71 on the Direction of Travel, 33 to the Call for Sites, and 4 to the Scoping Report. Respondents included a range of residents and amenity groups, landowners, organisations and statutory consultees. The list of all respondents (as received and not alphabetically ordered or in any other order of priority) is as follows:

Respondent reference no.	Name / Organisation	Responded to		
		Direction of Travel	Call for Sites	Sustainability Appraisal Scoping Report
1.	David Mattes	X		
2.	CBRE on behalf of LGC Ltd, Teddington	X	X	
3.	Katie Parsons, Historic England	X	X	X
4.	Lambert Smith Hampton on behalf Metropolitan Police Service	X		
5.	Helen Monger, London Parks & Gardens Trust	X		
6.	Marine Management Organisation	X		
7.	Michael P Martin, Milestone Commercial	X		
8.	Sharon Jenkins, Natural England	X	X	
9.	Shirley Meaker	X		
10.	Stuart Morgans, Sport England	X		
11.	Surrey County Council	X	X	
12.	Tim Lester	X		
13.	Heather Archer, Highways England	X	X	X
14.	Mayor of London	X		
15.	Transport for London (TfL)	X		
16.	Avison Young on behalf of National Grid	X		
17.	Hannah Bridges, Spelthorne Borough Council	X		X

Respondent reference no.	Name / Organisation	Responded to		
		Direction of Travel	Call for Sites	Sustainability Appraisal Scoping Report
18.	Phoebe Juggins, Department for Education	X		
19.	DP9 Ltd on behalf of London Square Developments	X	X	X
20.	Gary Backler, Friends of the River Crane Environment (FORCE) (and supported by Crane Valley Partnership)	X		
21.	Lucy Wakelin, Transport for London (TfL) Commercial Development	X	X	
22.	Jimmy Wallace, Richmond Athletic Association	X	X	
23.	Peter Willan & Paul Velluet on behalf of Old Deer Park Working Group	X		
24.	Paul Velluet	X	X	
25.	Phoebe Quayle	X		
26.	Hannah Lukacs		X	
27.	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	X		
28.	Alice Shackleton on behalf of The Kew Society	X		
29.	Richmond Cycling Campaign	X		
30.	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	X		
31.	Tim Catchpole on behalf of the Mortlake with East Sheen Society	X	X	
32.	Mark Jopling on behalf of Udney Park Playing Fields Trust	X		
33.	Tim Catchpole on behalf of the Mortlake Brewery Community Group	X	X	
34.	DP9 Ltd on behalf of Harlequin Football Club Limited	X	X	
35.	Alice Roberts, CPRE London	X	X	
36.	Rebecca Marwood, NHS Property Services Ltd	X		
37.	John Waxman, Crane Valley Partnership	X		
38.	Justine Langford on behalf of Ham and Petersham Neighbourhood Forum	X		
39.	Solomon Green	X		
40.	Jamie Edwards	X		
41.	Anthony Swan	X		
42.	Jeremy Gill	X		
43.	Paul Hart Prieto	X		
44.	Roger Cutler	X		
45.	Sally Beeson	X		
46.	Joan Gibson	X	X	
47.	Trevor Rowntree	X		
48.	Roger Wilson on behalf of Roger Wilson Consulting LLP	X		
49.	Margaret Edwards	X		
50.	John O'Brien	X		
51.	Su Bonfanti	X		
52.	Winston W Taylor	X		
53.	Richard Woolf on behalf of McDaniel Woolf Architects	X		
54.	Paul Luton	X		
55.	Jon Rowles	X	X	
56.	Rob Kennedy, Environment Agency	X		
57.	Tom Clarke, Theatres Trust	X		
58.	Michael Atkins, The Port of London Authority	X		

Respondent reference no.	Name / Organisation	Responded to		
		Direction of Travel	Call for Sites	Sustainability Appraisal Scoping Report
59.	Paul Massey	X		
60.	Kingsley Izundu, Royal Borough of Kingston upon Thames	X		
61.	Tom Minns	X		
62.	Kathleen Massey	X		
63.	Carol Rawlings	X		
64.	Johanna Eschbach on behalf of RiBRA (Richmond Bridge Residents Association)	X		
65.	SSA Planning Limited on behalf of Kentucky Fried Chicken (Great Britain) Limited	X		
66.	Robert Philip Cunliffe	X		
67.	William Mortimer	X		
68.	Mark Jopling	X		
69.	Geoff Bond on behalf of Ham & Petersham Association	X		
70.	Melissa Compton-Edwards	X		
71.	Patrick Wood	X		
72.	Andrew Weeks		X	
73.	Pegasus Group on behalf of Sheen Lane Developments		X	
74.	Savills on behalf of Thames Water		X	
75.	David Taylor		X	
76.	Henry Clive		X	
77.	Jennifer Farrell		X	
78.	Graham Green		X	
79.	Max Hampton		X	
80.	Lira Cabatbat		X	
81.	Dawn Roads		X	
82.	Campbell Brown		X	
83.	Chris O'Rourke		X	
84.	Natasha Waithe		X	
85.	Malcolm Hay		X	
86.	Hester Huttenbach		X	
87.	Clarissa Louise Angus		X	
88.	Defence Infrastructure Organisation on behalf of the Ministry of Defence		X	

Summary of main issues raised

Officers have produced a summary of the main issues raised for each question/area of comment as set out in this document, and an overall summary at the end of each section/topic. As responses could be made via an online questionnaire and/or by email, these have been collated and cross referenced as appropriate, reflecting the order of the questionnaire format on the Direction of Travel and then separately the responses to the Call for Sites. There are schedules of all comments in full and appendices with any supporting documents submitted which are published separately for each consultation:

- Schedule of Direction of Travel All Responses Received
- Schedule of Direction of Travel All Responses Received - Appendices
- Schedule of Call for Sites All Responses Received
- Schedule of Call for Sites All Responses Received - Appendices
- Schedule of Sustainability Appraisal All Responses Received.

Summary of main issues raised

Direction of Travel

Introduction

- The Mayor of London notes all development plan documents in London must be in general conformity with the London Plan, and publication of the final version of the new London Plan is anticipated in the summer when it will form part of Richmond's development plan. Welcomes the ten themes identified and the new challenges, changing priorities and key shifts intends to address. Welcomes early thinking and recognises important to address housing delivery and ensuring the demand for other land uses can be met.
- Some respondents supported the need for a new Plan, although others raised queries. A respondent felt the explanation of what a local plan is not clearly explained, referring to Government guidance to address housing needs, economic, social and environmental priorities. A respondent felt local residents views are regarded as not important. A respondent felt it was too generalised, and could not find the local plan. A respondent felt the document was not in an accessible format to share with the community, therefore interest to respond to the consultation was low. A respondent did not have time to give detailed replies to all the questions. RB Kingston suggested it was drafted in a positive user-friendly way. A respondent supported setting stretching standards and targets to push developers, although a respondent felt pursuing policies to show environmental awareness is a waste of resources. A respondent felt the plan needs to be flexible to accommodate changes, take a strategic 10 year view, with parts evolving as trends and legislation evolves i.e. concentrate on the parts that do require updating.
- Some respondents supported the climate emergency and sustainability, although a respondent felt the implementation date was too far away for an emergency; a respondent felt other priorities are more important. Some respondents supported the focus on population growth, but a respondent felt there is overpopulation. A respondent felt it did not mention how the level of traffic gridlock will be reduced, exacerbated by the closure to traffic of Hammersmith Bridge, and at black spots. A respondent felt air quality was not given the prominence it deserves. A respondent felt it is incorrect to state the borough is prosperous, safe and healthy, as in many areas there is relative deprivation and a marked variance in health outcomes. A respondent felt it did not address Disaster Management e.g. the major risk of flooding. A respondent suggested exploration of the Slough and Heathrow Travel to Work Area, as cause of congestion and pollution. A respondent felt parking facilities should not be removed, particularly from Twickenham Embankment, as shops, pubs, clubs and restaurants depend on customers being able to park nearby.
- A number of respondents (who made comments later on in the consultation period) commented on uncertainty due to Covid-19, and potential implications for residents, visitors, businesses and employees.
- Many respondents have made set out general introductory information, such as about their association/group or about a particular site if they are a landowner or developer.
- DP9 on behalf of London Square Developments supported the reasons why a new Local Plan is needed, suggesting the former Greggs Bakery site (see also Call for Sites) is not sustainably located for large-scale employment use and will deliver 116 new homes, noting the relevance of viability and this must be considered in preparing policies which seek to protect certain uses.
- Richmond Athletic Association set out they are continuing to investigate how they can improve the existing facilities at the ground to meet increasing demand from the local community and secure the future of rugby on the site, and are in the early stages of developing a revised masterplan (see also Call for Sites). Support for the vision and themes identified, suggesting the objective to protect and improve the borough's Heritage, Culture,

Green infrastructure and open land should also recognise the requirement to make best use of existing resources to ensure these can be enhanced to better meet residents' needs.

- Old Deer Park (ODP) Working Group question whether the adoption of the Climate Emergency Strategy necessitates a new strategic vision and a new place-making strategy, and whether the growth in population and anticipated housing target, and other Government changes, are justification for preparing a new Local Plan so soon after the adoption of the current Plan. Welcome the opportunity of putting forward issues relating to the care, conservation, development and management of the ODP for consideration, primarily relating to the failure of the Council and the Inspector to consider and respond to unresolved designations relating to ODP in the 2018 Local Plan and SPD. This position was also made by an individual, Prospect of Richmond and the Kew Society. Prospect of Richmond (and their comments supported by Friends of Richmond Green) also felt the approach seems to promote growth while putting at risk the quality of the environment, and with growth a balance is important e.g. in central Richmond the mix of retail, office and residential use. They acknowledge little evidence at this stage, but suggest evidence aware of don't believe supports proposals to dilute current planning policies. Their focus on the heart of Richmond (including Conservation Areas for Central Richmond, Richmond Green and the Riverside) as having valuable diversity, and it is essential the characteristics are maintained to sustain the character, quality and historic significance. The Kew Society also questioned whether the new vision would be a fundamental change to planning policy, and it should not be a question of either protection or something "you want" e.g. whether shortage of affordable housing could override designation of protected open lands that would be lost gone forever, and long evolved and tested planning policy and practice would be destroyed.
- Richmond Cycling Campaign welcome the increased focus on supporting non-car travel modes, and wider sustainability issues. Ask the plan must start from the assumption that the private car should not be designed into the borough, need a robust plan to make sure every person, everywhere, can make safe, low- or no- carbon transport decisions - to support a range of crucial policy imperatives including keeping people active, reducing borough carbon emissions, prioritisation of public transport, and maximising space available for people, and paint this vision in 20 years. Key challenge is the dependence on cars.

Does this document raise any specific equality impacts which would affect particular groups or communities of people in Richmond?

- A number of respondents said no, but a number of individuals mentioned their own specific issues, such as older people or related to how access to transport affects different groups. The comments raised by individual respondents were:
 - Parking standards – number of spaces could impact certain protected groups, some of whom are less likely to drive, and developments with poor public transport accessibility can have a negative impact on quality of life.
 - Communities on the west of the borough are more likely to be commuting to work in the Slough & Heathrow Travel To Work Area than those in the east, and question if there is a need for better public transport to those areas e.g. extend proposed West London Orbital Railway to Twickenham - drill down into these TTWA statistics.
 - Focus on climate change detracts resources from other more essential areas e.g. state of roads, empty shops, litter, crime.
 - Stakeholders referred to are not identified.
 - Anyone who understands scientific issues, also anyone suffering from any of the serious environmental issues specific to the borough e.g. rising anti-social behaviour in less affluent parts of the borough.

- Car drivers and pedestrians are disadvantaged while cyclists benefit above everyone else. A lack of equality in road and pavement use.
- Young and old have specific needs and should be given priority. Protecting air quality – reducing pollution, protecting green spaces, cultural centres and beautiful buildings, are vital for health and well-being of all.
- Reliance on cars/vehicles adversely affects less wealthy and socially excluded groups and causes lack of social cohesion.
- Needs of older people probably underrepresented e.g. in relation to housing needs.
- Traveller community – need to be considered as indicated in Housing section.
- Introduction is fair and reasonable.
- Many disadvantaged groups (BAME, Disabled) have fewer employment opportunities and less likely to get jobs in central London accessible by public transport - parking restrictions proposed likely to restrict their employment opportunities more.
- Make clear if document is available in other formats or languages.
- Essential built environment is adapted to frail and disabled e.g. public space more user-friendly for range of users e.g. people with buggies.
- Disappointed consultation about Mortlake Brewery site that the Council has failed to understand issues of ramming so many dwellings and school into area where movement is constrained between river and railway. Suggestions of extended catamaran service using Thames have been ignored.



Scale of the challenge, opportunities and setting the Direction of Travel

What challenges do you think Richmond borough faces now and in the future?

- The majority of respondents mentioned challenges that were already covered in the Direction of Travel consultation document, or felt the key challenges were articulated. These included references to the climate emergency, air quality, protecting/managing all green spaces, sustainable development, ageing population, encouraging appropriate development on brownfield and change of use, and affordable housing. Some referred to the need to change behaviours e.g. over cars.
- Some respondents commented that the rising population will add pressure to a range of services/facilities, a burden on the already congested area and local infrastructure. Some respondents felt the borough should not be a wealthy dormitory, but remain somewhere a range of people can live and work. Some referred to recognising the diversity of the borough, and protecting the character, special heritage and areas of historic interest. A number linked this with housing densities, not a one size fits all approach, the challenges of accommodating development, and the pressures to build on land including small pockets and Green Belt. A respondent felt the concept of hyper-local plans -and specific Village Plans where they remain useful - should be used and built upon. A respondent felt there must be a

strong approach on green space to direct developers to where the Plan supports development. Some respondents referred to the quality of new homes. Some specific sites mentioned – Stag Brewery, Udney Park Playing Fields.

- A number of respondents mentioned travel, traffic and parking issues. Richmond Cycling Campaign raised concerns if the borough fails to design and build sustainable transport options (reducing car dependency) we will live in an area blighted by more congestion, and resulting risks of pollution, road danger, severance and inactivity. Ham & Petersham Neighbourhood Forum referred to the Government's plan for decarbonising streets and achieving 'Vision Zero' road safety targets. A respondent raised how to cater for orbital traffic. Some referred to specific areas e.g. Ham, traffic between Kingston and Richmond, gridlock at critical junctions, 20mph, and issues e.g. commuter parking, more protected cycle lanes, support for Crossrail. Some referred to the electric economy, electric buses, electric charging points.
- A number of respondents mentioned declining/supporting centres, shops and businesses. A respondent felt there was a lack of street markets, which makes it more difficult to start up a business. A respondent said encourage low cost premises for pop up shops and micro businesses. A respondent felt business rates are too high and have driven out small business, charity shops compete with small shopkeepers, and a detrimental increase in fast food outlets, nail bars, hairdressers, tanning salons and empty shops. A respondent referred to less spending and online shopping trend. A respondent felt opportunities for employment decreasing due to loss of office space and pressure on industrial space, and firms relocating from the Slough and Heathrow Travel to Work Area to avoid curbs on car parking and congestion charging means jobs are now located in areas with poor public transport accessibility. Some respondents mentioned shortages of staff in health, care, hospitality etc. and a respondent mentioned ensuring students have business skills. A respondent mentioned supporting high speed internet.
- A number of respondents mentioned funding/investment/resources, the context of budget constraints. A respondent felt should focus on improving the quality of infrastructure for existing residents, not the climate emergency.
- Some respondents also referred to aviation and Heathrow. A respondent referred to poor air quality from aircraft and road traffic generated by the airport. A respondent referred to threat of a third runway.
- Some respondents mentioned Covid-19. A respondent felt the population forecasting, especially by age range, out of date and inaccurate, which is important as underpins the assumptions driving decisions and expenditure – suggest a pause and rethink/replan in a few years time. A respondent noted possibility of reoccurring and new pandemics. A respondent felt many shops might not reopen.
- Some individual respondents raised specific issues, including rough sleeping, crime and policing, water pollution, roadworks. A respondent said a serious rise in the use of class A drugs and the damaging effect on communities. A respondent felt more active policing of petty crime. A respondent felt the Council wasted money e.g. throwing out the plan for Twickenham Embankment, on cycle lanes/routes, and a shortage of money put into medical and social care.

How might our role in London change in the future?

- Some respondents identified the borough's green spaces and Arcadian landscapes as important, a green lung of London for recreation, attracting visitors e.g. Richmond Park, Richmond riverside, which must continue. A respondent noted the historic role as mediator between inner and outer London, and felt as this role will change more accessibility and management of the open spaces/landscapes is crucial.

- Some respondents commented on leadership. The Ham & Petersham Neighbourhood Forum response said by leading to address the challenges with visionary, evidence based policies and implementation – effective leadership with consultation to agree ways to achieve the necessary changes, representing quiet voices and hard to reach groups e.g. children. RB Kingston felt given the priority given to the climate emergency, the role would change in the approaches and actions to minimise environmental impact, in terms of cutting carbon emissions, waste and pollution - necessitating a new strategy vision and place making strategy, and clear and stringent policy for new developments. A respondent said be a role model for other Boroughs and the GLA. A respondent suggested action across London on key infrastructure e.g. coordinated approach to repair of Hammersmith Bridge, challenging rail operators who provide substandard services, to reduce homelessness and rough sleeping in combination with services related to drugs/alcohol. A respondent felt should become a world leader in ecology and ecology-technology hub for London. A respondent felt depends on future legislation affecting responsibility of Councils and Mayor of London, but would like to see a joined-up approach e.g. safe, connected pedestrian and cycle routes, Clean Air Zones including TfL controlled roads and London-wide mandatory car free/car lite developments regardless of PTAL - guiding principle apply to all developments is whether easily reachable without a car, as Government acknowledge public transport and active travel will be the natural first choice for daily activities, using cars less.
- Some respondents identified made positive comments on future opportunities. A respondent noted encourage NPL and start up businesses, encourage schools and St Mary's University. A respondent noted as working from/at home becomes more realistic for more people, could become a place where more SMEs flourish. A respondent felt public transport links need to be frequent and reliable. A respondent seeing a decline in retail businesses, encourage new retail in Richmond's centre to ensure its popularity continues.
- Some respondents felt it might not change, not at all etc.
- Some respondents raised concerns. A respondent said stop worrying about virtue signalling projects and focus on the basics. A respondent felt we are not relevant to the rest of London. A respondent felt likely to become less important. A respondent felt mounting pressure to build cheaper, smaller flats/houses and green spaces may come under pressure to be built upon. A respondent felt in danger of becoming a no go area for young families and poorer people. A respondent felt the Government may give the Mayor rent controls and may need to react to new Mayor's priorities. A respondent felt will become a dormitory town due to accelerating loss of office space. A respondent felt without major changes, will continue to attract wealthiest and make housing for middle and lower income workers difficult – expand social housing to address this, and implement new low emissions and private vehicle restrictions to lower carbon footprint. A respondent said yet to see information about plan to recover from disaster scenarios e.g. flooding, and formalise/extend the reliance on local people to respond to needs of elderly and infirm resulting from Covid-19 lockdown for future catastrophic situations.
- A respondent felt over the past 20 years moved from suburban to urban and likely to continue, used to be on fringe but boundary moved to M25 (or beyond) and dense urban belt inhabitants travel through to work in central London.

What do you think should be our priorities in the new vision?

- A number of respondents raised priorities that were already covered in the Direction of Travel consultation document, or felt the key priorities were articulated. These included references to climate change and sustainability, air quality, affordable housing, active travel, and the focus on brownfield sites and making efficient use of land, and specific groups both young and old people. A respondent referred to Government guidance to address housing needs, economic, social and environmental priorities.

- A number of respondents commented on sustainable travel - promoting walking, public transport and cycling, reducing car use and need to travel. Richmond Cycling Campaign raised embedding new transport hierarchy, and working in partnership with other authorities to deliver sustainable transport options e.g. liveable neighbourhoods bid. Ham & Petersham Neighbourhood Forum referred to the Government's plan for decarbonising streets, creating cohesive and inclusive self-sustainable communities and to achieve Vision Zero for safe active travel. A respondent felt need to incentivise travel by foot, bike and public transport for local journeys. A respondent suggested a rating system that takes account of active travel as well as public transport provision. Some respondents suggested reducing parking, a respondent suggested more parking. Some comments related to encouraging electric transport, quality of roads.
- A number of respondents commented about green infrastructure, including protecting heritage, open land and biodiversity, including no development on Green Belt, MOL. A respondent felt need to identify green chains and wildlife corridors better. A respondent suggested more re-wilding to protect wildlife, responsibility as a lung for London. A respondent felt Richmond should be a global leader, and lead London as the world's first National Park City. A respondent felt opportunities at certain locations for land currently designated as green and open land to be better utilised to meet growth needs and this can be achieved without causing any harm or detrimental impact upon the availability of meaningful green and open spaces.
- A number of respondents commented on the economy, helping business to grow, sustainable jobs. A respondent felt the existing protection of employment land will not allow to meet increasing housing delivery targets, and should consider brownfield employment land unviable for continued use for housing. A respondent felt the borough has responsibility to be one of leading boroughs for the new sustainable economy, accelerated post covid-19. A respondent felt people do not realise how much employment there is in the borough or that the Plan needs to protect land for employment purposes.
- Some comments related to character and design. The Ham & Petersham Neighbourhood Forum refer to the Mayor of London's Good Growth by Design. A respondent felt it was not important to have individual policies/strategies for different parts of the borough, like the Village Plans, as took resources and have not delivered, but want emphasis to be different in different places. A respondent suggested need a realistic expectations of residents for places of habitation to evolve, and acknowledge 'matching what exists' as the only architectural responses isn't the viable choice. A respondent suggested protecting character of Conservation Areas. A respondent raised maintaining and enhancing character, and not ugly 'bog-standard' designs.
- A respondent felt need to state clear objective to improve people's quality of life.
- The PLA consider the vision must include references to the boroughs various waterways, including the Thames, and the role can play in combating climate change.
- A respondent felt vision should outline the most appropriate locations for new homes within or in close proximity to the designated town centres and public transport, including land either within or adjacent to existing built up residential areas where infrastructure such as good road access already exists – in particular suggest Richmond town centre and its surrounding residential hinterland is an appropriate location for further infill development and limited intensification / extension of existing established residential areas.
- Some respondents commented on the balance, or order, of priorities. There were comments on taking action and meeting climate change targets. Friends of the River Crane Environment (FORCE) raise concern that, even though the Council has adopted a Climate Emergency Strategy, there is a fundamental imbalance - the emphasis is on construction and development in the borough, with less emphasis on the need to improve investment, management and operation of the borough's green assets, and on investment in

pedestrian/cycleways to reduce road traffic, to mitigate the climate emergency. A respondent felt ordering the climate emergency before housing is likely to cause conflict with the Government Inspector. A respondent felt the ten objectives were right but overly ambitious, and would like to know which three will be the focus and for investment – some seem out of reach, key priorities – tackle air pollution, address traffic congestions/lack of residents parking, reinvigorate High Streets and protect the Conservation Areas. Some respondents supported housing, but others suggested a reduction of population to solve the housing crisis, focus should be on looking after communities, and avoid sacrificing to greedy property developers who put nothing back into local communities.

- Other priorities mentioned included Heathrow, rough sleeping, infrastructure e.g. health, schools, policing, street cleaning, roadworks.
- Some respondent felts the approach to preparing a new vision and Local Plan might lead to the unravelling of many existing and sound planning policies and designations, and questions (such as if there are parts of the borough to accommodate growth or encourage intensification) suggests well tried and tested protective policies could be set aside in favour of short-term economic and other objectives.
- Some respondents raised the use of technology in engagement and solutions e.g. Fix My Street app, post Covid-19 and continuation of cash economy.

Have we covered all the key issues and overarching challenges facing the borough in the ten themes above or is there anything missing?

Of respondents who answered the question: 14 said yes, 14 said no and 4 said don't know [6 did not answer the question]

- Individual respondents identified different specific issues that were missing, there was not general support for a specific topic or issue. The areas raised by each respondent included:
 - there has not been enough co-operation with Kingston and Hounslow Councils as they need to meet some of our unmet housing requirements and both have 'opportunity areas' next to the borough; this needs to be set out by the Council in accordance with the NPPF. Benefits to extra density, such as better shops, more night life, cultural institutions, and opportunities for business – provide jobs for a percentage of new residents.
 - there should first be scientific investigation whether the borough is a net producer of CO2, if so then priority should be given to planting/maintaining more street trees.
 - the Council needs to build social housing, and all contracts/changes work across cross borders (unlike current bike hire contracts).
 - introduce a quality of life / happiness measure for the borough to see the impact on people's overall feeling of well being.
 - a willingness to change minds e.g. policies on vehicle use and pollution ignore the cost of scrapping old vehicles.
 - over population.
 - need for specialist housing for older people and every home to be a lifetime home.
 - no children approaching secondary school age in North Kew have automatic access to any secondary school in the borough.
 - new bridge crossing opportunities (refer to WSP bridge feasibility report).
 - the housing market for people needing housing benefit isn't based upon the borough boundary but Broad Market Rent Areas – taking into account BMRA much of the 'shortage' disappears. Need to deal explicitly with an ageing population.
 - Port of London Authority consider the theme on increasing biodiversity must refer to green and blue spaces, recognising the importance of the River Thames as a key asset.

- increase the wellbeing of residents through addressing significant disruptions (noise pollution, traffic, air traffic) and refer to specific guidelines from WHO. Tackle increase in crime.
- cross-referencing the Disaster Management Plan.
- making our Village High Streets thrive, support independent traders, as people will switch to smaller more ethically sourced products over life of Plan. Is the space re-allocation radical enough?
- Importance of preserving Conservation Areas.
- A number of respondents did not have anything further to add, or did not know the details, or referred to responses in their previous questions. A respondent felt the Direction of Travel focused on too many things, which dilute resources, and should focus on three that will transform residents' lives.

In addition to our existing approaches of directing larger scale development to the borough's town centres, and expecting the majority of development on brownfield sites, where should we direct new growth in the borough?

- Many respondents supported the approaches towards town centres and on brownfield sites.
- Areas to direct new growth to were: flats in areas within walking distance of the new Crossrail 2 stations, near stations, atop car parks at retail parks or in place of retail parks, areas with high PTAL, Ham, reordering redundant retail spaces, inefficient supermarkets and out of town shops with large amounts of surface parking and low storeys e.g. Sainsburys at North Sheen, Sainsburys St Clares, Hampton and Tesco Twickenham (rebuild as multi storey with food retail on ground floor), underused sites with redevelopment potential or where opportunities for housing densification or intensification and or mixed use incorporating housing is possible, car parks around Twickenham Station (like Wembley, retaining parking and developing over), over Richmond Station (like at Twickenham Station). A response noted to await the suggestions to the Call for Sites. A respondent suggested need for a brief for sites such as Sainsburys at Hampton St Clares, Homebase in Hanworth, surface car parks at Twickenham Stadium, Kew Retail Park etc.
- The Mayor of London response also noted the approach directing office development to town centres (*see Increasing jobs and helping business to grow*). A respondent noted Covid-19 will further switch food distribution to on-line, so "superstores" will continue to decline.
- A number of responses linked the issue to public transport accessibility. Richmond Cycling Campaign stress all new developments should be car free, if PTAL is too low then the solution is to improve PTAL, and suggestion of an Active Travel Availability Level would compensate for a lower PTAL e.g. Stag Brewery – enough road space if prioritise active travel and public transport. The Ham & Petersham Neighbourhood Forum suggested major development should be in locations that with high PTAL and enabled to reduce car dependency. A respondent suggested small-zone CPZs should be introduced borough-wide to discourage commuter parking and unnecessary short trips within borough by car and prevent displacement parking by residents in new car-free/car-lite developments, and felt new housing should cater for those who cannot or do not want to live with a car and reduce car trips e.g. car club parking only, sustainable transport hubs.
- Some respondents felt there was nowhere else, or could not advise, with individuals commenting that it would alter the character of the borough and the focus should be on existing businesses and the quality of existing residents' lives, and brownfield sites should be exhausted first. A respondent felt existing policies did not direct development and decisions should be made on a case by case basis, particularly with the uncertainty caused by Brexit on economic, social and demographic conditions. A respondent felt growth plans should be deferred as a minimum by 5 years. A respondent suggested more car parking for shoppers/pubs/restaurant users and for large developments more electric charging points,

as well as more places for young adults and more sports facilities. A respondent felt there is no excuse for building on green sites and making the climate emergency worse. A respondent felt opportunities to build housing on brownfield sites has been lost (e.g. Wickes, new school and Lidl in East Twickenham) and sites that could have met the needs of ageing population (e.g. Brewery Lane, over Twickenham Station, Richmond Police Station). A respondent felt the borough needs to play its part to clean up the environment e.g. how hydrogen fuels will be delivered. A respondent felt the “majority” is not enough and encourages speculative planning.

Should we continue to protect our green and open spaces from inappropriate development, or are there parts of the borough that could assist in accommodating growth?

Of respondents who answered the question: 29 considered that we should continue to protect our green and open spaces from inappropriate development, 3 considered that there are there parts of the borough that could assist in accommodating growth [6 did not answer the question]

- Many responses strongly supported the principle of protecting green and open spaces, as a valuable resource for residents and visitors and future generations. A respondent noted the wording of the question implied these spaces could assist in accommodating growth, and other parts of the borough must be identified. Richmond Cycling Campaign would like to see green spaces supporting active travel, there are opportunities to improve walking and cycling routes around and through the green spaces. The Department for Education referred to their comments on protecting open space and playing fields in line with the NPPF. A respondent noted inaccessible green land is valued for wildlife and biodiversity, and due to the climate emergency should be given the highest protection. A respondent supported protecting green space even if not regarded as high quality, as important to prevent unconstrained sprawl, although if relatively low quality and otherwise suitable for development, e.g. good transport links, could be released. A respondent felt we should have a 'grown up' conversation about Metropolitan Open Land and Conservation Area designation. A respondent linked green space provision to reducing demand on public health services e.g. Mortlake Brewery loss of community sports field and for pupils no green field playing area. A respondent noted London is the world's first National Park City. A respondent felt protecting the spaces is so important due to the climate emergency and vital for physical and mental health as demonstrated by the Covid-19 crisis. A respondent felt 'inappropriate' is too low a threshold which encourages challenges in planning, and should be 'all', as need stronger disincentives for speculative building, noting compulsory purchase order legislation is sufficient for genuine public need for building on green space e.g. infill in hospital grounds.
- Parts of the borough that could assist in accommodating growth mentioned were: large out of town retail centres and supermarkets, Fulwell Bus Station (redevelop with air-rights above, and land to increase the linkage between Fulwell Golf Course and Strawberry Hill Golf Course), Udney Park, Twickenham Embankment (restore lost car parking), Teddington High Street Telephone Exchange, Teddington Police Station, and areas by proposed new Crossrail 2 stations. A respondent felt if Ham/Petersham was better served by public transport there might be areas where increases in density and use of small plots would be viable.
- A respondent felt we don't need more people and quality of life has been dropping over the last years. A respondent perceived central Richmond, East Sheen, Mortlake, Kew and Barnes has not borne the brunt of housing (or affordable) development in recent years and development should be spread evenly over the borough.

Which areas of the borough do you think are capable of taking more growth than others, for example based on their proximity to town centres and stations?

- Areas mentioned: atop car parks at retail parks or in place of retail parks, at large food supermarkets and DIY superstores, at and near town centres and stations, extend Richmond Station like Twickenham Station, House of Fraser in Richmond, Ham, Whitton, and West Hampton.
- Areas mentioned as not capable of taking more growth: central Richmond, around Richmond Park, Ham and Petersham, East Twickenham.
- A respondent noted the frequency of services at stations is important. Some respondents referred to Crossrail 2. A respondent said town centres need more attention paid to the effects on wellbeing and service provision. A respondent suggested House of Fraser in Richmond for extra care housing for older people as close to facilities and would boost demand in local shops, cafes etc. A respondent suggested a catamaran service on the Thames, with space required for car parking allocated to innovative industries (e.g. vegetable growing in underground tunnels in Waterloo). A respondent suggested “Big Box” retail is becoming irrelevant and will disappear by 2030.
- Some respondents suggested none, and others referred to their responses to the previous questions.

Which areas of the borough may be suitable for more infill development and intensification?

- The following were mentioned: town centres (including Twickenham and Richmond), main road corridors, Richmond, empty shops, Mortlake Riverside, sites within 800m of train stations and town centres and Richmond Station.
- A respondent commented how large sites for infill and intensification can be allowed without building on gardens, in areas constrained by roads, railways and the river. A respondent felt there may be a need for a full land-use opportunity survey to identify underutilised land. A respondent commented on the need for a plan approached response, with the exception of ‘key’ Conservation Areas. A respondent felt the Council was the impediment to schemes coming forward and should identify sites and consult on what could be reasonably accommodated.
- Some respondents did not suggest any areas, some suggested none, or not in their area, and others referred to their responses to the previous questions.

Are there parts of the borough that could be transformed through larger scale development and encouraging intensification (for example redevelopment of existing single dwellings to blocks of flats)?

- The following areas were mentioned: parts of Richmond and Twickenham town centres, main road corridors, Richmond Station, Council owned buildings and car parks e.g. Whitton Community Centre and Old Deer car park, over railway stations, Ham, Ham Close, Whitton and West Hampton, Council housing estates, “Big Box” retail.
- A respondent felt with the number of empty shops in Richmond town centre may be reaching the point at which move towards mixed housing/retail is plausible.
- A respondent suggested where ownership is fragmented using compulsory purchase powers.
- A respondent felt this suggests the Council would be open to inappropriate development, in an urban rather than suburban setting – a short term view potentially destroying special “green” characteristics of the borough.
- A respondent noted most redevelopment would need to involve more than one dwelling to create an acceptable outcome, and that the majority of single dwellings in large plots have heritage value. A respondent felt the challenge is the impact on the character of an area, subdivision of large houses into flats increases density without an impact on appearance,

and an alternative form of intensification is home sharing / intergenerational living where couples/single people provide accommodation in their homes to others, sometimes in exchange for support/company/transport.

- Some respondents did not suggest any areas or suggested there might be parts of the borough but did not identify them. A respondent felt we do not need more people, due to pressures on parking, school places. A respondent said not in East Twickenham. Some respondents referred to their responses in the previous questions. A respondent felt this would be for the worse, opposing flats. A respondent questioned whether it is desirable. A respondent felt high rise developments in the 1940/50s e.g. at Roehampton led to isolation and vandalism, and developments should be no more than 4 storeys with green areas and proper management. A respondent noted the Covid-19 pandemic should teach us that intensification is to be shunned.

Would you like to see individual policies and strategies for each of the different parts of the borough (such as Twickenham, Kew, Barnes, Hampton and Hampton Hill etc.) and if yes, how could they vary? Of respondents who answered the question: 19 said yes, 3 said no and 9 said don't know [7 did not answer the question]

- Some respondents felt we already had an area based approaches, whereas some respondents thought there was a current 'one-size-fits-all' policy.
- Many respondents indicated some support for area based approaches. A respondent felt it was better to have a coordinated approach. A respondent was in favour of decentralisation, but also a borough identity. Some respondents noted these are useful for areas anticipated to undergo significant change and the need to base on the revised population growth (or shrinkage). A respondent noted the pros and cons of the approach. A respondent raised a need to remove the view that certain areas are entitled to protection where others are less valuable so can be built on intensely, as creates pockets of poor areas; should not have areas of privilege.
- Many respondents referred to the existing Village Plans. A respondent felt policies can vary based on those. A respondent felt area based strategies essential if those are discontinued. Others noted an area based approach can build on them.
- The Ham & Petersham Neighbourhood Forum response felt having developed area specific policies as a valuable way of identifying issues and objectives in a local area, and noted the need to cooperate across local areas and boroughs. A respondent also noted in reality people use services, travel and move home across the borough. A respondent said it is impossible to draw precise boundaries.
- Regarding how strategies could vary, most respondents noted how areas vary in their characteristics, historic interest and geography, and there would be differences and opportunities. Noting areas have distinct personalities which local people know well, and differences should be preserved. Respondents felt some areas are closer to being metropolitan centres e.g. Richmond, Twickenham and other places are more suburban commuter towns e.g. Teddington, Whitton – a suggestion to protect the quietness of Whitton and Hampton Hill as a part of their fundamental character. A respondent noted these should not just be about where housing is built, e.g. ask about protected cycle path routes. A respondent noted the different needs e.g. Richmond's flourishing traffic-free riverbank could never work in Twickenham with its working riverside. A respondent noted e.g. Hampton Hill and Ham more problems with crime and anti-social behaviour, Twickenham impacted by proximity of Rugby Ground and St Mary's. A respondent felt required for East Twickenham as an untapped opportunity, to develop the high street and make it practical for pedestrians and a better place to live, and to reinforce conservation area protection and develop heritage assets. A respondent felt they should focus on keeping communities and individual business thriving. A respondent felt these should be tailored to

retain the heritage of each area, such as defend the abundance of green spaces such as Barnes Common, The Wetlands, Leg of Mutton, Barnes Green with its pond, the Tow Path, and protect Mortlake as a historic site.

- A respondent commented on the lack of investment in Twickenham (roads, shop fronts, litter, lack of doctors appointments) and yet more people being crammed into the area, conversely Richmond centre not showing signs of wear, clean streets, so clearly investment is being made, and asked why this is. A respondent referred to the need to protect all green spaces. Other issues mentioned include the PLA consider the need for a specific policy on river corridors, need for a boroughwide approach to fly tipping.

Can you suggest any other ways we could accommodate future growth and new development, ensuring support for sustainable communities?

- Other ways suggested were: if service roads behind shopping parades/town centres adopted then converting maisonettes above shops into flats, opportunity areas and sites in the Ham & Petersham Neighbourhood Plan, building above offices in business parks, large shops, council owned buildings like community centres, building Council houses, footbridges (support second stage WSP report), developing office space into housing.
- Some respondents referred to changes due to the Covid-19 pandemic. A respondent noted office space will come through businesses closing. Some noted the increase of home working will continue. A respondent noted decline in historic manufacturing and will rely on technological innovation and specialist manufacturing alongside financial services elsewhere. Some respondents noted we should concentrate on developing green spaces and carbon free developments, leading a green economic revolution.
- Some respondents did not suggest any other ways. Some respondents answered no, there should be no more people, houses and stop talking about growth. A respondent referred to protecting local high street independent traders, business rates relief. A respondent referred to reducing business rates, improving road and pavement surfaces and more car-parking. A respondent referred to promoting walking, public transport and cycling, and stopping use of cars. A respondent suggested changing Broad Market Rent Areas. A respondent felt need to cooperate with Hounslow and Kingston Councils regarding office space and employment priorities. A respondent questioned on what premise growth planning is taking place e.g. anticipated increase in secondary school places at Mortlake shown to be wrong, and suggested research with universities to establish if competitive. Some respondents referred to their responses in the previous questions.

Overall officer comment on responses to 'Scale of the challenge, opportunities and setting the Direction of Travel'

The majority of responses mentioned the challenges and opportunities that the Council had set out in the Direction of Travel, with the most comments on the key areas like climate change, active travel, green infrastructure and the built environment. Some commented on the balance of priorities, whether these all could be achieved, with different views in both directions e.g. whether the borough is overpopulated or growth is an opportunity, whether there should be more or less parking. There was general support for the approaches towards town centres and on brownfield sites, with some support for developing area based approaches, and strong support for the principle of protecting green and open spaces. Many respondents raised particular priorities, issues or sites that are important to them, and some of these ideas and issues, including those that were not mentioned in the Direction of Travel, are beyond the remit of planning policy e.g. in relation to Heathrow, finance. Some responses did pick up the potential changes arising from the Covid-19 pandemic.



Responding to the climate emergency and taking action

Do you agree with the proposed policy directions? If you disagree with any of the policy directions, please tell us more.

Of respondents who answered the question: 18 said yes, 6 said no and 5 don't know [9 did not answer the question].

- Welcome and majority support for the recognition of the climate emergency
- Three people felt that there is no climate emergency in the UK
- Transport is the main source of greenhouse gas emissions and restricting car use is the best way to tackle it
- Others said stop demonising the car
- A quicker response to the emergency is required
- Not strong enough in protecting Biodiversity and Green Space.
- There appears to be a non-existent inspection regime for ensuring that things like green walls and roofs are correctly installed and maintained.
- The policies lack any proposals for managing and enhancing open spaces
- Concern over flood risk assessments and basement developments

How can we promote high quality sustainable development as part of a new Local Plan?

- Use the borough's waterways as part of the transportation of construction materials and waste to/from development sites.
- The cost of low carbon energy sources is too high.
- Insist on zero carbon for all developments, not just large scale.

How can we continue to set out a pathway to zero carbon?

- Planning and building refurbishments should meet strict criteria and be ENFORCED.
- Don't bother, it's impossible to achieve.
- Should plan to remove CO2 from the atmosphere.
- Discourage car travel/diesel vehicles: look to electric transportation
- Better roads that allow traffic to get through more quickly.
- Free public transport for all.
- Fight Heathrow expansion and build sustainably.
- More battery charging points provided quickly.
- Encourage the development and expansion of decentralised energy networks
- Encourage greater use of alternative energy.
- Several respondents set out various technical solutions (many were akin to those in the Sustainable Construction Checklist)

How ambitious shall we be in requiring zero carbon standards for all developments?

- Totally/ 100%/very ambitious
- Council should be using money to help existing residents become more energy efficient.

- Set out a clear path to zero carbon standards for all developments, subject to viability and effectively monitor their implementation.
- New builds will need to be treated differently to older property
- There were three dissenting voices who thought the ambition was a mistake.

Are there other planning means to mitigate and adapt to climate change that you want us to pursue?

- The globe is entering into a dangerous climate cooling phase.
- Stop concreting of front gardens & allow rainwater to escape/ removing tarmac verges and replacing them with grass.
- Go to Zero Carbon as soon as possible for the Council and for all residents, businesses and premises
- No expansion of Heathrow
- Review the Pedestrian and Cycle Bridge Feasibility Study of October 2018 and commission the next stage report.

Are there any other climate change and/or sustainability issues that you would like the new Local Plan to address?

Of respondents who answered the question: 17 said yes, 3 said no and 3 said don't know [15 did not answer the question]

- Need a spoke of cycle routes leading out of the town centres into their catchment areas.
- Explicitly include the sustainability “proximity principle” into the local plan, thereby leading to less need to travel
- More, and compulsory recycling
- As transport is the largest emitter of greenhouse gases, the borough should encourage car-free/car-lite development and advocate and enable a shift in travel behaviours to more sustainable modes of transport: walking, cycling and clean public transport.
- Make working from home easier/have adequate broadband in place
- Acknowledge the value to the environment of back gardens / back lands both as habitats and as wildlife corridors
- Need to make the various railway tracks SINC, this will also help prevent the loss of habitats caused by Network Rail selling land adjacent to railway tracks to neighbouring homeowners.

General comments

- Some believe the policies in the current Local Plan adequately cover climate change and air quality issues
- Many suggested solutions were transport based e.g. low carbon and electric vehicles.
- SuDS was identified as a possible solution for flood risk and ground water flooding
- One respondent identified the development of Ham as likely to increase pollution and lead to loss of green space

Overall officer comment on responses to ‘Responding to the climate emergency and taking action’
There was, in the main support for the policy direction. The majority of the solutions put forward related to transport and travel. Several comments reflected the desire for more management of green spaces, monitoring, stronger environmental protections and more urgent implementation of the actions, i.e. before 2024.



Delivering new homes and an affordable borough for all

Do you agree with the proposed policy directions? If you disagree with any of the policy directions, please tell us more.

Of respondents who answered the question: 10 said yes, 9 said no and 6 don't know [13 did not answer the question].

- The Mayor of London response emphasises the need to aim to exceed the new London Plan housing target, including for small sites, and beyond 2029 the proposed target should be based on a combination of the GLA SHLAA and local up to date evidence. Welcomes the intention to undertake a Local Housing Needs Assessment (which should be based on the government's standard method) including to understand tenures, housing for the elderly and the needs for different sizes of dwellings. Notes the Mayor will lead a London-wide Gypsy and Traveller accommodation needs assessment.
- The Spelthorne Borough Council response notes housing is a strategic and cross boundary issue. Every effort should be made to meet local housing needs within the borough and support use of up to date evidence to inform options. Richmond should look to Greater London to assist in meeting needs if unable to do so alone. Spelthorne estimate will only just be able to meet their standard method housing need figure, which is the starting point for determining the number of homes needed. Further Duty to Cooperate discussions will be held. Another respondent also highlights the need to co-operate with neighbouring authorities to meet unmet demand, suggesting potential for joint developments in the Kingston and Hounslow opportunity areas.
- Some respondents support delivering new homes (and more affordable homes), against the London Plan target (and a potentially higher emerging target) and the Government's objectives, and broad support for the overall Direction of Travel on housing. Support for making efficient use of land, promoting the consolidation and intensification of large underutilised sites or those unviable for continued use, brownfield sites, including site allocations and undertaking a boroughwide Urban Design Study. However, some respondents concerned that the housing targets are too high and we do not need more homes or people, as the borough is overpopulated. A respondent felt the character and heritage is important and would not wish to see increase in density or height above existing. A respondent was not in support of using existing MOL/Green Belt for new homes. It was noted the commitment to undertake a local housing needs assessment. A respondent felt the section did not set out a policy direction other than meeting the housing targets.
- Many comments noted the implications of growth and additional housing on other needs, particularly social infrastructure such as education facilities, transport, and there should be a commitment to increasing the delivery of green spaces and playspace in terms of the quantum and quality. Specifically FORCE also note the pressure of increasing building heights on views and vistas from open spaces and dark river corridors in the borough, and their opposition to development compromising this and suggest the absence of visual intrusion to all users of open space should be recognised as a public benefit. A respondent felt expanding schools would be an efficient use of infrastructure, rather than new facilities.

- Some respondents referred to specific sites and areas, including the need to ensure housing sites did not displace parking, and for an evidence base to assess the balance in central Richmond between residential, retail and office use, for area based policies to allow buildings to return to their original use outside the core area. A respondent suggested the Harlequin's site and the Twickenham Centre Depot site can make a significant contribution; a respondent put forward the Greggs site (see also Call for Sites). A respondent referred to the London Plan Good Growth by Design, so housing delivery should be sensitive to the local context and accessibility, such as in Ham & Petersham. A respondent felt small sites are an essential component but important development respects existing style.
- Some respondents referred to specific types of housing. A respondent suggested the gap in the middle needs to be addressed, and suggested discounted market sales and alms houses should be explored. TfL Commercial Development welcome the potential of Build to Rent. Some supported providing housing for single persons. A respondent supported specialist housing for older people such as extra care, to encourage people to move from under occupying large family homes there is a need for well-located accessible units with communal facilities. A respondent supported building for a range of household types. A respondent referred to removing the CIL difference between C2 / C3 to prevent incentive to developers to deliver tenures not based on social need.
- Some respondents referred to other priorities such as walking, public transport and cycling, and should not provide parking spaces, that growth plans need to be revised in line with more aggressive climate change models, and use of the river and emergency planning.

What do you think are priorities for the type and size of new dwellings?

- Some respondents supported a range of flat and house sizes, it was noted this creates a mixed community. There was support for flats as a priority but at the opposite end there was support for building small and large houses. It was noted to await the results of the housing needs assessment to be informed of the trends.
- Some respondents supported affordable housing needs (social housing, for rent and homeownership), and the tenure mix secured needed to be enforced, while others felt the focus should be beyond the needs on the housing register.
- It was recognised that the type and size was linked to whether suitable for young people, families etc. A respondent noted overcrowding with families living in small flats. A respondent felt young adults are struggling to access the housing market and are not on the housing register, which may be showing demand for family housing is more pronounced than it actually is. Some respondents noted the need for extra care, accessible homes.
- A respondent noted larger dwellings have always been a part of Richmond's history. A respondent noted in densely built areas for new neighbours to welcome new small sites it's important they respect the existing scale and style.
- A respondent noted there should be no new luxury dwellings of any size.
- Some respondents reiterated their view opposing any new dwellings and referred to other priorities such as transport, zero carbon, pre-fab buildings.

Could other forms of housing assist with meeting local needs?

Of respondents who answered the question: 12 said yes, 3 said no and 6 said don't know [17 did not answer the question]

- Some respondents identified the need for more student housing as well as supported housing for the homeless.
- Other types of homes mentioned included social housing, shared housing, Council houses, empty shops or unused buildings near town centres, alms-houses for older people, community-led housing and self- and custom-build.

- It was also noted where new developments are not possible that residential areas on main roads should be redeveloped. A suggestion for higher density new transportation hubs.
- A suggestion was made for a new form of housing; co-working, which would provide bedrooms for young adults to rent, communal working/living space and a garden area.
- It was noted to await the results of the housing needs assessment, and a respondent referred to their response to earlier questions.

Would you support housing delivery from small sites, if it is of good design and contributes to local infrastructure?

Of respondents who answered the question: 19 said yes, 4 said no and 2 don't know [13 did not answer the question]

- A respondent supported provided tall buildings are not sited on small sites, there should be a maximum limit on height and density.

What other ways could help deliver more affordable housing, in the right locations, given land values and property prices in the borough, and recognise the wider community benefits it brings?

- Overall strong support for prioritising affordable housing (including for rent) due to high property values and the lack of affordability, to provide an inclusive community, and above other contributions.
- The Mayor of London response welcomes the intention to seek 50% affordable housing and sets out the Local Plan should reflect the Threshold Approach (as set out in the London Plan) to limit those circumstances where viability evidence is required, by providing an incentive for developers to achieve the minimum level of affordable housing thereby avoiding scrutiny of viability. If setting a threshold higher than 35% this should be based on viability evidence.
- A respondent also supported a robust approach to understanding viability evidence, and the need for a pragmatic approach given competing interests such as delivering social infrastructure.
- There was support for making efficient use of land. It was suggested there is particular scope for sites owned by the Council and Richmond Housing Partnership to review land use, such as additional infill, residential above, and converting existing roofspace to provide new units. A respondent recognised this was linked to finance, and a respondent suggested this needed a 10 year strategy.
- A respondent noted the Plan should distinguish between brownfield and greenfield sites as greenfield land has lower associated development costs.
- A respondent noted models where a discount is maintained in perpetuity such as restrictions on staircasing, enable more recycling of affordable housing. A respondent suggested the Council start building new council homes directly or set up a property company. A respondent suggested changing Broad Market Rent Areas may enable people to access more housing options. A respondent suggested co-working/living schemes can offer an affordable option. A respondent referred to the Community Led Homes toolkit. A respondent suggested CPO of empty properties. A respondent supported meanwhile housing. A respondent supported prefabricated building. A respondent referred to removing the CIL difference between C2 / C3 to prevent incentive to developers to deliver tenures not based on social need.
- Some respondents suggested particular development sites to deliver affordable units.
- Some respondents referred to other priorities such as parking, overcrowding.

Overall officer comment on responses to 'Delivering new homes and an affordable borough for all'
 On overall housing delivery, there was support for the approach set out in the Direction of Travel, however while some respondents support delivering new homes there are others who feel targets

are too high and the borough is overpopulated. The impact of housing growth on infrastructure and facilities was noted.

There was a range of views on the priorities for the type and size of new dwellings, suggesting support for a range to provide for mixed and balancing communities, to be informed by the outputs of the Local Housing Needs Assessment. Some suggestions for other forms of housing to assist with meeting local needs were mentioned, including shared houses, student housing, self and custom build.

There was strong support for increasing affordable housing delivery, and ways to understand viability. Overall there were some ideas for making more efficient use of land, and some specific suggestions for how to increase delivery of affordable homes, however some of these are beyond the remit of the Local Plan.



Shaping and supporting our town and local centres as they adapt to changes in the way we shop

Do you agree with the proposed policy directions? If you disagree with any of the policy directions, please tell us more.

Of respondents who answered the question: 15 said yes, 3 said no and 5 don't know [15 did not answer the question]

- Strong support for town and local centres and proposed policy direction. Support for self-sustaining borough where shops and services are available locally.
- Some support for more flexibility for change of use (including housing) in peripheral parts of centres provided that loss of retail would not change the character of the local centre.
- Encourage redevelopment of out of centre developments.
- Support for sustainable transport to get to town centres and for pedestrianisation.
- Some support for protecting ancillary retail space and servicing.
- Promote mixed use development, encourage other businesses in underutilised shops.
- Approach should take into account the pandemic and impact of lockdown.

Do you agree with the spatial strategy proposed? Should major development be encouraged equally amongst the five town centres? Or should for example, Richmond and Twickenham be the appropriate location for the majority of any new retail floorspace?

Of respondents who answered the question: 12 said yes, 5 said no and 5 don't know [16 did not answer the question]

- Overall, strong support for the spatial strategy proposed and focus on the five town centres. All five centres need a good range of shops and services. RB Kingston felt that major development should be allocated as per the role and function of the centre in the hierarchy.
- Some felt that the larger centres of Richmond and Twickenham should accommodate major/most development. Whitton and Teddington mentioned as not having capacity to

accommodate it. However, several respondents considered that development should be spread more evenly across centres.

- Too much retail space, greater flexibility needed. Support for housing on edge of centres.
- Take into account impact of pandemic.
- Businesses should be encouraged anywhere and parking made available, but encourage near stations.
- No mention of retail parks

Does the existing hierarchy categorise borough centres correctly? Are there too many local centres and parades in this defined centre hierarchy? Local centres, neighbourhood centres and parades are relatively well spread across the borough. However, should we reduce the number of centres in the hierarchy, and/or reduce the amount of/or completely remove designated frontages in some, taking into account their role in meeting local need?

Of respondents who answered the question: 14 said yes, 7 said no and 3 don't know [14 did not answer the question]

- Overall, strong support for the existing hierarchy.
- The Mayor of London commented that the strategic approach should reflect the town centre network in the Intend to Publish London Plan including the night-time economy classifications¹.
- Encourage growth of/ support for local centres. Contributes to reducing need to travel and supports sustainable transport choices (as advocated by RB Kingston). Smaller centres and parades, such as Ham Parade are also important and help to maintain community cohesion.
- Allow flexibility to change uses (including to housing) where centres in decline and in more peripheral locations. Redevelop parade in Ham Street.
- A respondent felt that more areas should be designated as key retail in smaller centres like Whitton.
- A respondent felt the market should dictate where businesses go.

If the evidence supports a more flexible approach to retail policies what other uses should be encouraged?

- The Mayor of London suggests the approach should reflect the changing retail environment and general decline in retailing in the capital. Specifically, that the types of uses identified in the ITP London Plan as being acceptable in town centres, including office development, residential, social infrastructure, cultural uses and leisure uses, should be considered acceptable in borough town centres.
- Approach should await outcome of research.
- Some wished to discourage relaxing retail planning policies and reducing the importance of shopping frontage policies. Ensure no loss of retail since last review.
- Protection for Post Offices and shared bank services.
- Review decommissioned and redundant sites in centres and larger shed sites.
- Other uses to be encouraged include:
 - strong support for community uses such as youth clubs, new libraries and health and wellbeing businesses/gyms, specifically reinstatement of police station in Ham. RB Kingston supported the co-location of facilities.
 - cultural and social uses such as art galleries, performance spaces and permanent market pitches, as well as facilitating enjoyment of the Thames and environs (advocated by the PLA);

¹ Twickenham and Teddington are identified as having important areas of night time economy which are of local significance and Richmond is a more substantial area of regional or sub-regional significance.

- café culture and drinking establishments (supported by the Environment Agency)
- service uses such as physiotherapy, osteopaths, spas, beauty shops – rather than residences; and
- offices, including flexible and bookable office/work space and shared workspace
- uses which can co-locate.
- Discourage retail parks
- Continued engagement with commercial agents requested.

Café culture could be encouraged and/or the night time economy. Are there some centres where this would be preferable? Should we be flexible in terms of mixed A1/ A3 uses? Existing policy currently restricts further entertainment uses such as cafes and restaurants, drinking establishments and takeaways for specific frontages in parts of centres where there are overconcentrations of such uses– should it continue to do so? Are those areas still appropriate and should other areas be considered? If so, which ones?

- Many respondents felt there were too many cafes. Some did support café culture (the Environment Agency), especially if they could function as part of shared workspace.
- Concerns were raised that the relaxation of planning and licensing controls could lead to an increase in the negative impacts of the restaurant and bar sector including anti-social behaviour, smells and noise, particularly in relation to nearby residential property.

The borough could potentially lose around a third of its office stock as a result of the government's introduction of permitted development rights allowing change of use from office to residential. Uptake has already affected the availability of office stock in the borough and impacted negatively on the local economy. Should policies identify parts of town and local centres where offices could be encouraged to contribute towards increasing office provision?

- Offices should be encouraged, including flexible and bookable office/work space and shared workspace. Provision of less formal meeting spaces for homeworkers.
- Encourage flexibility for change of use between office and residential in town centres but not predominantly residential areas.

Is there more scope for further community uses in centres, potentially even in key retail areas?

See in list above.

- Strong support for a range of community uses including cultural and art facilities, health-related services and libraries etc

Would housing, including residential on upper floors, work if located next to other (potentially noisy or smelly) uses in centres? Where might a relaxed policy to encourage more housing apply? Should it, for example, apply in designated frontages?

- Mostly support, including RB Kingston, for more housing on upper floors in town centres, particularly for lone/small households.
- Support for housing on edge of centres, in more peripheral locations.
- There were opposing views on whether housing should be acceptable in in designated frontages.
- Prepare evidence to help to assess the balance in central Richmond between residential, retail and office use.
- Develop specific policies to return buildings to their original all residential use especially in non-core areas such as Hill Rise/Richmond Hill.
- Agent of change principle raised. New developments should not lead to bars and clubs being forced to close – unless the noise they are making is already unreasonable / illegal.

- Issues such as noise and smells can be controlled by the planning process, engineering and acoustic segregation. Some may wish to accept disturbance to live in a central location.
- Housing and offices should be separate.
- A respondent felt more housing not supported as insufficient infrastructure available.

In terms of developing centre strategies and visions, what should they include? How should these relate to local and wider transport accessibility? Your views in relation to specific centres are welcomed.

Strategies and vision:

- Connectivity, viability, place making and architectural delight.
- Support for sports facilities and reinstatement of ice rink.
- Research needed before approach can be justified - retail policy relaxed and controls relating to night-time and evening economy reduced.
- Abolish business rates to rejuvenate centres
- Provide more business space to discourage commuting to Central London.
- Investment in Heathside including Council support for re-opening of public house.
- In relation to Whitton town centre: redevelop telephone exchange to extend centre and provide extra shops and offices.
- East Twickenham: policies to be in accordance with Village Plan where still relevant, taking into account historic assets. Budget to be provided for high street improvement.

Transport accessibility:

- Support for pedestrianisation of town centres – they should be people-focused rather than car-centric.
- Review public transport, ensure coordination between different modes. Encourage pedestrianisation and remove onstreet parking in appropriate places.
- Each centre should have good quality and safe cycle routes planned and adequate cycle storage near all stations.
- Several respondents felt car parking was needed.
- Reduce journeys to school by car.
- Specifically consider Ham & Petersham which is most inaccessible in terms of transport.
- Developing Ham will decrease open space and lead to dangerous and polluting increase in road traffic.

Should the amount of key shopping frontages be reduced and/or should secondary shopping frontages (where some change of use is already allowed) also be reduced or removed altogether? Do we need to protect shopping in just the core areas which correspond with designated key shopping frontages? In the past a compact retail core was thought to foster comparison shopping (i.e. for those goods that people tend to go to several shops to compare products and prices before buying them, such as electrical household items, clothes and shoes).

- Most respondents objected to relaxation of retail policies and loss of control over change of use. Need for some shopping is recognised, especially for the more vulnerable. Support for local centres, including their community value, and current spread of shopping, with several respondents feeling that it was necessary to increase the spread to reduce travel. RB Kingston felt that the amount of designated frontage should not be reduced unless justified by market signals.

- Some support for more flexibility also:
 - Less important to have a retail core because comparing products carried out online.
 - Less retail and more community and business space needed.
 - A strategic approach to reducing retail should be employed rather than just letting it wither.
 - The market should decide how much shopping is needed.
 - Reduction in retail needed specifically in Ham Street/Ashburnham Road
- Further research needed to support an appropriate approach. Policy should be reviewed, but not taking a pre-determined view that the number of shops should be decreased.
- Need for high quality shop fronts.
- Some closures relate to landlords' decisions.
- Concern that deliveries from online shopping are increasing road use and that rationalisation and coordination of deliveries is needed.
- Continued engagement with commercial agents sought.

Should the 'key shopping area' relating to the operation of permitted development rights continue to be both key and secondary frontages?

Of respondents who answered the question: 6 said yes, 2 said no and 10 don't know [20 did not answer the question]

No clear view on this technical matter.

Is it appropriate to continue to protect local top up shopping facilities?

Of respondents who answered the question: 20 said yes, 1 said no and 5 don't know [12 did not answer the question]

Should this protection only extend to food shops and/or some selected types of businesses?

- Overwhelmingly, respondents felt that food shops should be protected, a view supported by RB Kingston and the Environment Agency. Some felt that protection should apply to all local shops to support the community and to reduce the need to travel.
- A respondent felt the market should decide.

Should we continue to provide additional protection for shops selling essential goods and Post Offices generally?

- With one exception, all respondents felt additional protection was still required, as they were important for the community, especially the elderly, those with small children and the disabled.
- A respondent felt that protection could be extended to specifically cover banks.

Is 400 metres an appropriate proxy for easy walking distance?

- The majority of respondents felt that 400 metres was still an appropriate proxy for easy walking distance. However, some felt the distance was too long, and others too short. Other distances suggested ranged from 300 metres to 800 metres.

Do we need to continue to protect pubs as strongly? Some pubs that do not have a food offer are struggling to stay open, despite their potential value to the community.

Of respondents who answered the question: 14 said yes, 8 said no and 3 don't know [13 did not answer the question]

- The majority of respondents supported the continued protection of pubs, mainly due to their community value. Related to this, several respondents felt that policies should seek to

enhance this community value, acting as social hubs and potentially to encourage the food offer.

- A small number felt that pubs were no longer needed due to changes in drinking habits and should be converted, including to residential. That the local community should be given the chance first to support the pub.
- A couple of respondents referred to landlords trying to circumvent marketing requirements to gain permission for change of use from pubs.

Are the locally set thresholds for impact and sequential tests still appropriate?

Of respondents who answered the question: 4 said yes, 3 said no and 13 don't know [18 did not answer the question]

- Thresholds which are set should be backed by evidence.
[there were other comments which did not relate to the issue]

How long should shops and pubs be marketed before a change of use is allowed if the proposal is contrary to policy?

- Opinion was divided on this issue. However, many felt that the marketing period was too long.
- The marketing period should differ between land uses. For example, a respondent suggested that for pubs, the period could be 5 years whereas for shops, suggestions ranged from 2 months to 3 years.
- The community should be consulted on what is the appropriate marketing period for their areas.

Should a policy be developed for redevelopment of existing retail parks/stores in less central locations?

Of respondents who answered the question: 15 said yes, 4 said no and 4 said don't know [15 did not answer the question]

- The vast majority of respondents were in favour of redevelopment.
- Many considered such sites as encouraging car use and being wasteful of space and capable of delivering housing and other land uses including office. Support for mixed use schemes.
- A respondent felt the market should decide and no policy is necessary, whilst another felt that a policy is needed to ensure proposals are appropriate in terms of height of buildings and provision of green space and social infrastructure.
- CPRE considered such sites are viable and much more sustainable alternatives to Green Belt.

Overall officer comment on responses to 'Shaping and supporting our town and local centres as they adapt to changes in the way we shop'

Respondents were generally in favour of the policy direction proposed. As indicated by previous consultations, the borough's centres are clearly valued. There is support for more flexibility in change of use, with a wide range of potential land uses suggested including housing, but also clear support for accessible local shops and services. Support also for the spatial strategy and hierarchy of centres and principle of meeting local needs in walking distance of residents' homes. Retail parks recognised as providing scope for redevelopment and making a more efficient use of land.

Respondents recognised that this is a time of change for centres. The need for robust research is highlighted to inform the approach taken, in particular, to take account of the impact of the pandemic on shopping patterns.



Increasing jobs and helping business to grow

Do you agree with the proposed policy directions? If you disagree with any of the policy directions, please tell us more.

Of respondents who answered the question: 17 said yes, 1 said no and 2 don't know [18 did not answer the question]

- General support for retaining employment uses in the borough, including large housing schemes also providing workspaces, or making a contribution to off-site workspaces.
- Need to ensure Richmond continues to be a place of employment and encourage shift towards less commuting.
- More focus should be on live-work settings.

Should we continue to protect our industrial-type uses?

Of respondents who answered the question: 17 said yes, 1 said no and 2 don't know [18 did not answer the question]

- The Mayor welcomes Richmond's intention to conduct an up to date Employment Land Review and carry out an industrial land audit.
- Embed the guidance on industrial intensification and co-location in Policy E4 and E7 of the London Plan into the Local plan
- The PLA supports the intention of the policy directions to establish the Agent of Change principle into policy
- There is a danger of misreading the market about industry use not being in demand and replacing it with distribution.
- continue to protect business premises but add new small low-cost premises instead of or as well as retail units at the bottom of flats.
- the (national) direction of travel is away from manufacture

Should we take a proactive approach and encourage intensification, or adopt a more locally distinctive policy in this regard that focuses less on introduction of residential on industrial sites, but that encourages further industrial / employment uses?

- Most said that industrial / employment uses should be encouraged and given priority over residential uses on site
- It is essential that Richmond continues to be a place of employment not just a dormitory; more local jobs will help us improve the environment, cut commuting and pollution.
- Richmond should adopt a more locally distinctive policy that focuses less on introduction of residential on industrial sites.
- One respondent stated that it would be a start if you weren't trying to reduce industrial use by making the Embankment traffic-free. No existing businesses can survive without collections & deliveries. Local trades-people will lose work because they can't park vans.
- A respondent said "No", you should build flats above business premises -more efficient land use, employees and customers on site

Should we continue to specify flexible small-scale units suitable to meet local business needs?

Of respondents who answered the question: 17 said yes, 1 said no and 1 don't know [19 did not answer the question]

- Limited responses to this question, although general agreement in yes/no question (see above).
- Three respondents referred to the importance of small-scale units to the borough, with one respondent commenting that the Council should “stop forcing them out of business”, and another stating that the proximity to Heathrow may mean larger sites are often used for freight and may not employ many people/provide lower quality jobs.
- Small-scale units could be provided at the bottom of flats instead of retail.

What priority should we give to employment uses over residential amenity if at all? For example a business park may be underutilised due to neighbours’ objections to potential transport impacts.

- Depends on the individual circumstances, case specific
- Employment uses should be given priority
- None, they can both be built at the same site
- focus on restricting the really disturbing activities, rather than shutting the whole site.
- Only one respondent said residential amenity should be given outright priority while others said it was a balancing act.
- DP9 on behalf of London Square Developments suggest the former Greggs Bakery site (see also Call for Sites) is not suitable for continued employment use, raising potential for harm to amenity of surrounding residents.

What type of sites, buildings and facilities are most needed to support the borough’s office occupiers, in particular its small and micro businesses, as well as those working remotely from their usual place of work?

- Support for low rents and shared spaces with flexible rental periods mentioned by four respondents (example given of The Space in Teddington). It was noted that current provision is often expensive and lower cost space could be provided in public buildings such as libraries and town halls. Noted impact of loss of small business space above shops on supply of office space (example given of Whitton).
- Other spaces suggested by respondents included existing vacant buildings, spaces above shops, historic buildings and decommissioned places of worship
- Different respondents stated car parking was required and was not required.
- Good broadband provision needed to support home working.
- Respondent from the Ham and Petersham Association commented that local small offices are not all centred on small number of locations.
- Flexible office space is key. Lesson from CV-19 is that we don't all need to herd into Central London 5 days per week -more flexible local office space would make a big difference to carbon footprint and quality of life. (This response was under question above but seems more appropriate here)

Should we encourage and protect river-related business?

Of respondents who answered the question: 17 said yes, 0 said no and 2 don't know [19 did not answer the question]

- General support for river-related businesses providing employment and contributing to the borough’s character.
- One commented that there was a lack of support for river-related businesses in the past.
- PLA welcome continued protection of river-dependent facilities, which is supported by the emerging London Plan and the PLA’s Thames Vision.

General comments

- Mayor of London refers to policy E1 of Intend to Publish London Plan which directs new office development to the borough’s town centres and notes that Richmond town centre is identified as being suitable for both speculative and mixed-use office development and Twickenham identified for having potential for mixed-use office development. The existing small office capacities in East Sheen and Teddington should be protected. Richmond should clearly differentiate its approach towards industrial and office development.
- For one developer, delivery of housing was seen to outweigh the need to protect inappropriate sites for continued employment use.
- Richmond is an attractive location to large and small-scale businesses and the encouragement of small businesses, start-ups and the like is important.

Overall officer comment on responses to ‘Increasing jobs and helping business to grow’
 There was support for retention of employment/industrial and for Richmond to adopt a more locally distinctive policy that focuses less on introduction of residential on industrial sites. More local jobs will help us improve the environment. However, for one interested party the delivery of housing should be a key priority in the new vision for the Local Plan.
 It is worth noting for this section, of the respondents answering the yes/no questions, most were in favour of the proposed policy approaches.



Protecting what is special and improving our areas (heritage, culture and open land)

Do you agree with the proposed policy directions? If you disagree with any of the policy directions, please tell us more.

Of respondents who answered the question: 20 said yes, 2 said no, 2 said don’t know and 1 agreed and disagreed [12 did not answer the question]

- Prospect of Richmond responded that current policies offer adequate protection for heritage, culture and open space – concern that Direction of Travel seems to relax controls that already exist. Support Direction of Travel in encouraging visitors and tourist. Help residents to maintain heritage and culture of central Richmond, the Riverside and the Green, for own benefit and for wider community and visitors.
- Disagreement that Village Plans should be discontinued as they enabled local people to contribute to how their town develops and encouraged a broader approach to heritage than fragmented conservation areas. May lead to other areas preparing own neighbourhood plans like Ham and Petersham.
- Another resident was concerned about potential watering down of existing policies.
- FORCE strongly supports objectives in relation to rivers, surrounding banks and open spaces and welcomes recognition of opportunities to improve poorer quality areas. Support improvement of under-utilised open spaces for public benefit rather than redeveloping them.

- CVP and Colne Valley Regional Park referred to the recent Colne and Crane Valleys Green Infrastructure Strategy which the revised Local Plan should make reference to and be aligned to.
- Other respondents referred to promoting walking, public transport and cycling and stopping use of cars and vehicles in the borough and doing more to protect the Victorian/Edwardian street scene that are not BTM.
- Ham and Petersham Association referred to need to control risk of increased urbanisation of conservation areas.

Heritage

Are our current policies strong enough to ensure the ongoing protection of the borough's historic assets?

Of respondents who answered the question: 5 said yes, 9 said no and 9 said don't know [15 did not answer the question]

- Historic England commented that current policies can be strengthened more to link conservation aims with other policies, including mitigating climate change, improving access and enjoyment and tacking flood risk, to ensure that the historic environment is an integral aspect to the plan.
- Historic England advocates design-led approach to growth based on character and understanding of local areas that could be informed by existing evidence sources (Characterisation of London's Historic Environment (LUC), London's Local Character and Density (Allies and Morrison) and London's Image and Identity – Revisiting London's Cherished Views).
- The London Parks and Gardens Trust (LPGT) contributed to the 2018 Local Plan and feel that the current policies have not had long enough to be applied/tested, and should therefore be carried forward. All new residential development must be in easy reach of well-designed open spaces and take care to avoid unintended consequences of development.
- Mayor of London welcomes the borough's recognition of the importance of Kew WHS and refers to Intend to Publish London Plan requirement for Heritage Impact Assessments for developments with potential to impact WHS and its setting.
- Friends of the River Crane Environment refer to borough's heritage also being found in historic industrial sites and watercourses, which should also be protected.
- General comments relating to protection of the historic environment, including avoiding unnecessary signage, managing visitor numbers, promoting walking and cycling over vehicle use.
- A number of respondents questioned adequacy of Conservation Area, Listed Building and Building of Townscape Merit (BTM), Non-designated heritage asset status in protecting the borough's historic assets.

Do you agree that we should actively identify opportunities for development and/or redevelopment where these can result in improvements to the character and appearance of existing conservation areas?

Of respondents who answered the question: 4 said yes, 18 said no and 0 said don't know [16 did not answer the question]

- This was generally felt to be inappropriate, particularly without adequate evidence to support the approach.
- Only two respondents felt that a proactive approach to identifying opportunities for development in conservation areas would be appropriate.

Culture

Are there other opportunities through planning to enhance the cultural offer and widen participation?

- Sport England commented that the New Local Plan should protect sports facilities and encourage new provision where appropriate and promotes Active Design principles.
- Support for increasing access to theatres and resisting their loss (including by Theatres' Trust) and support for historic music venues.
- Various areas were mentioned as requiring promotion in terms of their cultural offer.
 - Richmond Athletic Ground should be mentioned specifically as an attraction, bearing in mind its cultural offer.
 - Central Richmond, The Green and River (increased provision for the visual arts and performing arts in conjunction with education in the arts)
 - Old Deer Park
 - Royal Botanic Gardens, Kew
 - Udney Park Playing Fields
 - Reappraisal of historic assets in Ham & Petersham.
- Research needed to identify areas in cultural deficit and make provision.
- PLA supports Thames Policy Area and ensuring development along the River is appropriate.
- Better to give financial assistance to groups.

Green infrastructure and protecting our open land

Do you agree that the MOL and Green Belt boundary review should also incorporate a review of designated Other Open Land of Townscape Importance?

Of respondents who answered the question: 14 said yes, 5 said no and 2 don't know [17 did not answer the question]

- The Mayor is pleased that it is Richmond's intention to provide strong protection against inappropriate development in these areas in accordance with Policies G2 and G3 of the Intend to Publish London Plan
- oppose any de-designation of Green Belt and any development of Metropolitan Open Land which diminished the overall value, or potential value, of the open space network of the borough and did not, as a minimum, offer a compensating increase elsewhere in the borough
- Apprehension over the considerable risk of the potential de-designation of many, much valued open spaces of the Borough as an unintended consequence of a simplistic search for growth
- Concern that housing targets appear to be regarded as a legitimate test for the existence of "exceptional circumstances" & to legitimise the challenging of Green Belt/MOL boundaries on any future occasion
- Several including Spelthorne BC support the borough's intention to carry out a borough-wide review of Green Belt and Metropolitan Open Land
- Upgrade all LBRUT OOLTI designations to MOL
- Releasing and developing protected land is neither necessary nor desirable.
- agree with the borough's suggestion that there are potentially pockets of land that could benefit from a thorough assessment against the relevant policy criteria for designation.
- Seek a review of the obstacles and severance factors which prevent the physical joining up of current, near-adjacent open spaces of various designations into larger spaces

Are there any sites that you would like to be identified for designation as 'Local Green Space'?

- Stag Brewery Playing Fields
- Udney Park Playing Fields, Langham Road open space, River towpaths and open space leading down to the Thames

- Heathfield Recreation ground and its future extension should have the highest level of protection you can give it
- Crane Park and the Shot Tower
- Two respondents suggested Cambridge Gardens and Warren Gardens
- Westerly Ware, Pensford Field, North Sheen Rec, Raleigh Road rec.
- Ham Library garden
- Several other sites were nominated for POS, Village Green and pocket park status.

General comments (heritage, Green infrastructure and protecting our open land)

- Mayor of London refers to protection of strategic and local views, with an effective management process, noting 3 – D modelling as a valuable tool.
- No justification in seeking to amend, let alone dilute, the existing policies for the protection of local character, heritage assets, views and vistas, the Royal Botanic Gardens Kew WHS, MOL, trees, woodlands and landscape, social and community infrastructure, Public Open Space, & Allotments.

Overall officer comment on responses to ‘Protecting what is special and improving our areas (heritage, culture and open land)’

There appeared to be a fear that a review would automatically lead to a loss of Green Belt and MOL. The majority supported the protection of designated open spaces.

Respondents were in favour of continuing, and in some cases increasing, the level of protection afforded to heritage assets in the Local Plan. A policy approach of identifying potential sites for development within conservation areas was generally felt to be inappropriate.



Increasing biodiversity and the quality of our green spaces, and greening the borough

Do you agree with the proposed policy directions? If you disagree with any of the policy directions, please tell us more.

Of respondents who answered the question: 20 said yes, 1 said no and 2 said don’t know [15 did not answer the question]

- The majority supported the proposed policy directions. A respondent felt no change was required to existing policies.
- Greater protection needed for grass playing fields, and for green verges and for their reinstatement.
- Only build on the Borough’s many brown field sites.
- FORCE said the Local Plan should recognise the contribution that improvement to the borough’s river channels and wetlands can make to tackling the climate emergency. The “if possible” get-out (p42) should be removed. They welcome a review “identifying potential

new SINCs for designation” (p43). They also support the proposal to customise the Urban Greening Factor model to LBRuT-specific criteria. (p44).

- Support for the Council’s “implementing a biodiversity net gain imperative” for all developments
- All development should make a positive contribution and all development proposals should carry a mandatory requirement to “enhance green spaces and green features” including elsewhere in the borough if such enhancement proves undeliverable on the site of the development
- Green areas which are not accessible by the public must be regarded as important as those which are.
- Concern that the recent OSNIs should be reviewed having only very recently been added and vigorously examined.

Do you agree with our overall policy directions for protecting and enhancing our biodiversity as well as recognising the contribution that green infrastructure and urban greening make to tackling climate change?

Of respondents who answered the question: 20 said yes, 2 said no and 1 don’t know [14 did not answer the question]

- Build on brownfield land and protect greenfield and MOL. Should be much stronger on protecting green space and playing fields so resources are not wasted defending the Local Plan.
- Urban greening to be included in new developments and local town centres with the use of green walls and equivalent of CityTree.
- Stop use of cars and vehicles across the borough to help biodiversity.
- The Crane Valley Partnership said that the Local Plan must recognise that the River Crane, the Lower Duke of Northumberland’s River, the Whitton Brook and the open spaces along the river corridors are extremely valuable green infrastructure assets that need to be protected and enhanced so they can fully play their part in helping to mitigate the impacts of climate change.
- Need to recognise railway lines as habitat corridors and make them SINCs.

Do you agree that we should develop our own Urban Greening Factor model rather than relying on the generic London-wide model?

Of respondents who answered the question: 13 said yes, 2 said no and 5 don’t know [18 did not answer the question]

- Most respondents supported a local Urban Greening Factor (UGF) model which relates to the specific issues in this Borough.
- One respondent disagreed.
- Roof gardens and green walls should be developed.

Do you agree with the introduction of the biodiversity net gain requirement, and if so, do you have any suggestions on how this can be secured?

Of respondents who answered the question: 17 said yes, 2 said no and 4 don’t know [15 did not answer the question]

- Need to ensure green roofs are not over relied upon (they can turn out to be low value sedum mats) and that any wildlife corridors are wide, robust and with little light penetration.
- Need up-to-date survey information on much of the borough’s woodland and open spaces.
- One respondent felt that LBRuT are not to be trusted to protect the borough’s green land and that policies should be stronger.

General comments

- The Green and the Riverside are key MOL assets and must be protected from development
- There is pressure to commercialise the Riverside and this must be resisted.
- Policies in the current Local Plan cover biodiversity issues adequately and if further amplification is required, it could be dealt with by subsidiary planning tools.
- Suggestion to use on street parking spaces for tree planting.

Overall officer comment on responses to ‘Increasing biodiversity and the quality of our green spaces, and greening the borough’

There was backing for most of the policy directions. Respondents supported the protection of green spaces and many sought additional protections, better maintenance and enhancements. In general respondents agreed on a Local Urban Greening Factor and the Biodiversity Net Gain requirement.



Improving design, delivering beautiful buildings and high-quality places

Do you agree with the proposed policy directions? If you disagree with any of the policy directions, please tell us more.

Of respondents who answered the question: 17 said yes, 4 said no and 1 don't know [16 did not answer the question]

- There is a general support of the policy directions which one respondent noting that they are looking forward to reviewing the detailed policy wording when available.
- A respondent stated that Council's heritage policies value Victorian and earlier neighbourhoods over interwar neighbourhoods. There was concern the removal of the Whitton and Heathfield Village Plan will reduce the ability to protect the area from inappropriate development. Similarly, another respondent felt uncomfortable with the Richmond Borough Design Guide and its emphasis on history versus quality and favouring classic looking façades with the idea they more beautiful than others.
- There is a recommendation for tighter policy regarding Tall Buildings to protect the character of some town centres such as Richmond and out of town areas such as Manor Road.
- Other responses advised that Council should be prioritising other matters and that plans for Twickenham Riverside are not beautiful

How should the Urban Design Study identify areas for change and locations where tall buildings and/ or high density development may be appropriate?

- There were numerous responses which identified that tall buildings were not appropriate in the borough.
- Reasons provided about the lack of appropriateness included; the creation of wind tunnels at street level, they make it less attractive as a walking route and dangerous for less able people and they reduce access to sunshine and reduce daylight. It was also noted that

conservation areas should be excluded, areas with Grade II listed buildings and where a view may be obscured from a tall building.

- There was also particular concern regarding tall buildings in central Richmond.
- A respondent stated that this study should also identify areas not suitable for tall buildings.
- Other respondent noted the most important factor when considering tall buildings recognised that where tall buildings fit the local character of the wider area and the related infrastructure (transport, schools and healthcare) will not be overloaded.
- Another respondent identified areas suitable for tall buildings is above large supermarkets such as on Rugby Road, Hampton and business park buildings and town centres such as Twickenham.

Should design review be embedded as one of the policy tools to inform determination of planning applications, and what other tools may be useful to assess the design quality of proposed schemes?

Of respondents who answered the question: 20 said yes, 0 said no and 2 don't know [15 did not answer the question]

- Overall, there was strong support for the use of design reviews. However, alongside this support, many respondents would like the design review to have greater transparency and include community engagement as well as seeking the views of local amenity societies.
- Community engagement was mentioned as an additional tool and to be used earlier in the planning process.
- Other respondents noted that other tools should include environmental (e.g. heating), as well as examining the longevity and safety of the building. One respondent stated that new buildings should try and blend in with the local architectural style if there is any nearby
- One respondent advised that they did not know what a design review was but noted that Council views that the design and layout is the responsibility of the developer and as a result agreeing to nonoptimal plans.
- Other comments recognised the need to have more 'verified' images as some of the CGG images are misleading and there is a need for greater biodiversity and the greening of our towns through green walling, planted roofs and balconies

Should we develop our own borough-wide design guide to assist delivering high quality design, and what are the local areas' qualities and opportunities?

- There was strong support for the development of our own borough wide design guide. Nearly all responses affirmed approach although some with caveats.
- Where support was contingent, support was reliant on Council taking in the views of local residents, where it could be updated outside the local plan process or is able to reflect the distinctiveness of each town that makes up the borough.
- One respondent advised that they did not know the answer and wished for Council to decide if there is a need.
- Other responses noted that existing supplementary documents including the Village Planning Guidance, Conservation Area Statements and Design Quality Supplementary Guidance already fulfil this design guide/ or could be updated to create a design guide.
- Others noted that there should be specific guidance for riverside developments, that it should ensure adequate space for biodiversity and the ability to adapt these guidance's for particular areas (including leveraging shopfront traditions from Richmond Rd)

Do you have any views as to how the design and development of homes could address different lifestyles, abilities and stages of life, including an ageing population?

- A respondent noted that there is a requirement under the Equalities Act to allow equal access for all which requires building to undergo changes including lifts.

- Many respondents noted the need for developments to accommodate the different demographics and different groups within the Borough. Specifically, there was strong support for adaptive homes particularly for the elderly as to age to in place.
- A few responses also identified the need for more homes to accommodate the increasing single population
- It was also identified by a few respondents that environmental and noise pollution issues will likely increase over time and that housing design needs to consider this issue
- It was also identified that balconies should be required in all developments so that residents can grow plants and food.

General comments

- A few respondents discussed the potential impacts this policy may have on Richmond and the importance of maintaining high standards for this area and understanding a buildings ability to adapt to new uses and to comply with building regulations.

Overall officer comment on responses to ‘Improving design, delivering beautiful buildings and high-quality places’

Overall the responses received showed that respondents generally supported the future direction of how to improve design, deliver beautiful buildings and high-quality places. While many respondents do not particularly supportive of tall buildings, others recognised that the Borough will have this of development and suggested methods and considerations to develop a satisfactory tall building. From the responses received, it is evident that the community wishes to participate in shaping their borough and how buildings are designed to maintain the distinctiveness of the Borough but also to ensure residents safety and help improve biodiversity.



Reducing the need to travel and improving the choices for more sustainable travel

Do you agree with the proposed policy directions? If you disagree with any of the policy directions, please tell us more.

Of respondents who answered the question: 18 said yes, 8 said no and 1 don’t know [11 did not answer the question]

- Mixed response in favour and opposed to this question. A number of respondents noted the importance of vehicle transport to businesses and some residents who rely on road transport, such as elderly and disabled people.
- A number noted the negative impact of high levels of traffic congestion and felt that policies should aim to improve traffic flow in the borough, including addressing amount of through-commuting by cars (which requires coordination with neighbouring boroughs).
- Richmond Bridge Residents Association referred to the particular difficulty of cycling over Richmond Bridge and would welcome a study to consider the option of making the pavement on one side a shared cycle/pedestrian path with separation curb.

- Ham and Petersham Association stated that until PTAL in this area is improved measures to disincentivise car use will fall more heavily on those reliant on cars which tend to be older, less mobile people and young families.
- A number of respondents disagreed with the principle of CPZs, feeling that this made people pay for the use of the public realm, and encouraged more driving around to find parking spaces.
- Otherwise, general support for reducing car-dependence and a move to more sustainable modes of travel, promoting walking, public transport and cycling in the borough, as well as focus on car-lite developments.
- One resident suggested there be more focus on cycling lanes in the borough, including for longer distance commuter cycling, as well as better provision for local journeys.
- General support for electric vehicle use, including providing additional charging points.
- Highways England support policies that seek to reduce parking provision and encourage car-free or car-lite developments in the borough as these are likely to reduce the impacts of developments on the strategic road network (SRN).
- Richmond Cycling Campaign welcomes the recognition of active and sustainable travel options in the Direction of Travel and requests more detail be included about how this could be delivered. Requested to be contacted prior to submission of plan for examination.

What measures need to be put in place if the Council is to support car-free and car-lite development in areas with currently lower levels of access to public transport?

- Responses were split between respondents stating that all new developments should be car-free with no parking for private cars, and others disagreeing with this approach. Of those who were supportive of car-free and car-lite development, it was felt that this type of development could benefit younger and older people who did not want to own a car as well as those on lower incomes, as most housing in Richmond borough already has car parking,
- Improvements to public transport was a frequent response to this question. Measures referred to tended to be focused on bus provision and included:
 - support for more bus lanes;
 - Lower fares;
 - Intelligent public transport routing;
 - increased bus frequency;
 - integration between bus and train timetables;
 - reduced road congestion caused by road works making bus times unreliable;
 - clean services;
 - introducing bus lanes where possible;
 - reintroduction of trolley buses (being quieter and smoother than buses and less polluting); and
 - prioritising of buses over private vehicles on roads, including where cars can be parked.
 - 100% EV buses by 2030.
- Cycling infrastructure improvements were frequently mentioned and included:
 - support for segregated cycle lanes and dedicated cycle routes;
 - Safe borough cycling network;
 - further traffic calming measures to increase safety;
 - more cycle parking facilities including secure parking near public transport.
- Improvements to benefit pedestrians were mentioned by a number of respondents, including better connectivity through new foot and cycle bridges, good accessibility to social and cultural facilities and banning cars from narrow roads in particular (such as Church Street) and town centres and good design to reduce conflict between pedestrians and cyclists.

- Electric vehicle charging was supported by a number of respondents, including more charging points for electric cars. A small number of respondents felt that lower emission cars should be encouraged rather than car lite/car free development.
- A respondent was concerned that cars would still be needed for larger purchases, and that if people did more online shopping it would negatively impact on town centres and employment levels.
- TfL Commercial Development strongly agree that car-free developments should be supported, and that development in locations with high existing or planned public transport accessibility should be optimised in link with the Intend to Publish London Plan policy H1.
- Ham and Petersham Association were supportive of improvements to public transport and providing electric vehicle charging points but wanted to avoid a reduction in space for cars and opposed the closing of Richmond Park to traffic.

What additional facilities does the borough need to support greater levels of walking and cycling?

- Encouragement of more young people to cycle to school through measures to improve safety - suggested cycling proficiency classes, 20 MPH speed limit (Cycling UK may be able to advise)
- Improve poor quality of some cycle paths across the borough.
- TfL suggested securing sufficient quantities of good-quality cycle parking will enable more people to cycle. Support Council's aim to go further than the London Plan cycle parking standards given high levels of cycling in the borough. Developer contributions could be used to improve routes in areas less permeable by cycle alongside strategic and local routes. TfL welcome recognition of importance of bus networks within the borough and will continue to work the Council to understand how this can be improved protected and funded.
- FORCE support improvements for cyclists and pedestrians, seeking a borough-wide review of severance factors preventing the physical joining up of near-adjacent spaces into larger spaces, for example land ownership. Suggest Council needs to work alongside other boroughs and agencies such as Crane Valley Partnership and Thames Landscape Strategy to consider active travel at a sub-regional level. Recommend adoption of the Colne and Colne Valley Green Infrastructure Strategy by the borough.
- Measures recommended by respondents to improve walking and cycling routes included:
 - Secure cycle parking near stations, in town centres and all new housing units;
 - Review of all existing cycle lanes including those on main roads;
 - Prioritise pedestrians and cyclists over vehicles, including traffic calming measures;
 - Identification and better maintenance of main walking routes to match standards on main roads;
 - More protected/segregated cycle lanes;
 - Filling potholes which can cause damage to bikes;
 - Cycle rental schemes;
 - Focus on improvements in lower cycling areas of the borough;
 - Improvements to Richmond Bridge for cycling;
 - Improve cycle paths in Richmond Park if vehicle use is to continue;
 - Improve crossing points to requirements of Equalities Act;
 - Maintain vegetation on bridges better to prevent encroachment on footpath;
 - Benches on walking routes;
 - A number of comments specifying improvements to cycling and walking routes in Heathfield and Whitton;
 - Dedicated safe cycling route from Ham to Richmond (24 hours);
 - Reduce parking spaces in town centres except for elderly and disabled;
 - Improve all pavements;
 - Prevention of cycling and scooter use on pavements (including prosecution);

- Separation of walkers and cyclists in some circumstances where there is overcrowding (e.g. towpath)
- Encouragement by parents and schools for children to walk more;
- Reduce pavement clutter;
- Safe crossings on main roads;
- Better bus/public transport services
- Port of London Authority considered that Local Plan should include requirement for developments in close proximity to the River Thames to maintain and improve existing access to the riverside, or provide new access to the riverside and Thames Path, in line with existing Local Plan policy LP 18 (River Corridors).
- Ham and Petersham Association commented on the importance of local facilities in reducing vehicle use.
- Support for Richmond Cycling Campaign’s objectives (including low traffic neighbourhoods, cycle hangars, pedestrian priority crossing points, safe cycle lanes and schemes to reduce and coordinate deliveries in town centres).

If the availability of parking in the borough’s town centres was less than it is now, would it encourage you to walk, cycle or use public transport more?

Of respondents who answered the question: 9 said yes, 14 said no and 3 don’t know [12 did not answer the question]

- Mayor of London supports borough intention to apply Intend to Publish London Plan residential parking standards, including those for areas with low PTALs, alongside exploring potential for increasing levels of public transport and cycling infrastructure and active travel. Borough should however note Secretary of State’s Directions on the Intend to Publish car parking standards.
- TfL referred to importance of restricting car parking in new developments (car lite and car free developments) in achieving wider sustainability goals.
- Richmond Bridge Residents Association agree some reduction in town centre parking might encourage more non-car trips, suggesting existing car park areas could be more intensively used. Don’t support changing parking standards in low PTAL areas of the borough, ahead of improvements in access to public transport and where parking is reduced, resident parking should be prioritised.
- Suggestion from Prospect of Richmond that only residents parking and cycles should be able to access Richmond town centre.
- Appropriate levels of parking should be assessed as part of planning applications and policies should be set locally (as opposed to London-wide by GLA and TfL).
- Richmond Cycling Campaign suggested study of parking on public land in the borough to inform potential release of land for other uses.
- In general, there was limited support for reducing current levels of town centre parking. Respondents commented that this would discourage town centre visits, and therefore spending would be done elsewhere.
- A number of respondents commented that they already used public transport to access town centres unless they required the car, for example for large purchases.
- A small number of respondents stated that reducing parking availability in town centres may encourage a shift to more sustainable forms of transport, but suggested this goal could also be achieved through changing parking charging structures to discourage long-term parking.

Should the Council actively pursue alternative uses (such as for much needed affordable housing, employment space and/or social and community infrastructure uses) on its existing car parks in town centres?

Of respondents who answered the question: 16 said yes, 11 said no and 2 don't know [9 did not answer the question]

- There was a mixed response in favour and against reducing the levels of town centre parking.
- General support for redevelopment of existing surface and multi-storey car parks to provide parking (possibly underground) alongside other uses including housing, to make more efficient use of space.

General comments

- Prospect of Richmond referred to likelihood that there will be a limited reduction in emissions from vehicles over the plan period. There will therefore be a need for planning to address growth in electric vehicle use – electric charging of cars at scale – and a modal shift to public transport. Residents and visitors with zero emission vehicles should not be inconvenienced by any reduction in visitor and resident car parking capacity.

Overall officer comment on responses to 'Reducing the need to travel and improving the choices for more sustainable travel'

There were very mixed views on whether borough should aim to reduce car ownership in the borough by seeking more car-free/car-lite development. This was strongly supported by some respondents, whilst others saw the benefit of car ownership for residents, particularly those who were less able to rely on other modes of transport such as the elderly, disabled and young families. There was support for improving traffic flow on congested roads, particularly linked to through-commuting, but not necessarily by reducing levels of car ownership.

Bus travel was highlighted many times as being very important to residents in the borough, reflecting the relatively low accessibility to railway stations. A number of measures were suggested to improve the experience of bus travel within the borough. Cycling was highlighted as being very important to respondents and a number of measures were suggested to improve facilities for cycling, as well as the number of people choosing cycling as a means of transport.

Whilst a reduction in town centre parking was not generally supported, there was general support for the principle of redeveloping car park sites to provide parking alongside other uses and make more efficient use of space.



Securing new social and community infrastructure to support a growing population

Do you agree with the proposed policy directions? If you disagree with any of the policy directions, please tell us more.

Of respondents who answered the question: 20 said yes, 2 said no and 3 don't know [13 did not answer the question]

- The majority of respondents supported the policy directions. Of those that elaborated on their answer, the focus was on improving existing community facilities and promoting walking, public transport and cycling to decrease car use across the borough.
- One respondent noted that the 'sequential test' process needs to be written down in order to ensure Council officers are not writing the test as they receive planning applications.

Is there a need for a particular type of community facility in your local area?

- Many respondents identified the need to upgrade/refurbish/ enhance existing facilities to protect their future use as well as the ability expand for other community uses such as nurseries, spaces for older people/ elderly and more recreation/ sport uses. Heathfield Recreation Ground was identified by two respondents as a site for refurbishment and another recognised the importance of ETNA as community facility.
- A respondent advised that Mortlake needs a health centre and another has stated an additional Public House would be an effect community facility.
- A respondent recommended that Council jeep the Playing Pitch up to date with regular stakeholder consultation to future proof these groups post COVID-19.
- Ellery Hall has been identified by respondents as a site which should be retained. Similarly, a respondent believes that Council takes too long to make a decision such as Ellery Hall and this indecision serves no one
- There were a few respondents which didn't believe their area required any other facilities/ was already well served.
- The protection and expansion of river related sports and recreation facilities was another recommendation from one respondent.
- Metropolitan Police Service have identified the need for a car pound in the Borough.
- The NHS Property Services have advised that currently assessing vacant or underused space across their portfolio to identify space that could be repurposed for the provision of clinical beds in light of COVID-19.

What is the best way to provide enough school places for our growing population?

- There were mixed responses regarding the best way to provide enough school places for our growing population. While some suggested investing in new schools, upgrading existing, others felt that there is an overprovision of school spaces.
- Many of the respondents who supported new schools recommended that catchment areas are used and to reserve the site through the Local Plan process.
- A respondent noted that the private provision of schools should be expanded by providing free school places for children.
- Other respondents thought Council could better utilise existing schools site either by upgrading them or allow development in areas where there is sufficient school places available
- DfE discussed the various legislation regarding school provision and recommended that the site allocation tool is useful policy to ensure and safeguard school sites. They also recommended that Council continually monitors the position with regards to pupil places and school delivery and ensuring the Infrastructure Delivery Plan is up to date.

Should we encourage more community uses in borough centres? Should they be encouraged as part of larger or mixed use developments?

Of respondents who answered the question: 19 said yes, 1 said no and 2 don't know [16 did not answer the question]

- There was strong support for more community uses in the borough

- The respondents mentioned that;
 - it should be encouraged everywhere,
 - should not be at the expense of retail, and
 - should be a community use for the whole community and not a subsection.

Should there be increased public access to school facilities?

Of respondents who answered the question: 17 said yes, 2 said no and 3 don't know [16 did not answer the question]

- Most respondents supported public access to school facilities including for evening classes and sporting facilities. Multiple responses noted that there is a need for a community access agreement with schools to ensure the facilities could continue to be used and to meet future demand. A one noted that this school include independent schools.
- Others noted that currently there is adequate access to school facilities. A respondent clarified that increased public use of school facilities could compromise security and safety of the children attend that school.
- Others only support the increased use if it doesn't generate more disruptions for nearby residents or if staff will be provided to allow public access after as schools themselves are unable to afford this expense.
- Less positive responses included the expenditure associated with increased public access and that it may unrealistic to gain more public access schools due to bureaucracy

General comments

- A respondent recommended that the K5 to Grey Court School should be extended.
- The Mayor of London supported the intended approach and themes regarding new social and community infrastructure, creating safe, healthy and inclusive communities as they are closely aligned with the Mayor's Good Growth Objective GG1, Building strong and inclusive communities.
- The Metropolitan Police Service (MPS) were pleased that the DoT referenced 'policing and other criminal justice or community safety facilities' as social infrastructure within the adopted Local Plan. As noted in their recent submission to the Richmond Planning Obligations SPD Consultation, the MPS are seeking to secure S106/CIL from development due to the impacts on crime.
- Department for Education noted that where additional need for school places which are generated by housing growth, the Infrastructure Delivery Statement should identify the anticipated CIL and Section 106 funding towards this infrastructure. They advised that Local authorities sometimes experienced challenges in funding schools via Section 106 planning obligations due to limitations on the pooling of developer contributions for the same item or type of infrastructure. However, the revised CIL Regulations remove this constraint, allowing unlimited pooling of developer contributions from planning obligations and the use of both Section 106 funding and CIL for the same item of infrastructure. They also request a reference within the Local Plan's policies or supporting text to explain that developer contributions may be secured retrospectively, when it has been necessary to forward fund infrastructure projects in advance of anticipated housing growth.

Overall officer comment on responses to 'Securing new social and community infrastructure to support a growing population'

Overall, there was a general acceptance of the approach taken to secure new social and community infrastructure. Respondents seem particularly supportive of upgrading existing facilities, although some recognised the need for new facilities. Maintaining existing access to schools/ increasing access for other uses by the public was generally accepted. There is a divide however, regarding the need for school places although it was evident that there is a view that Council will need to carefully

consider the demographics of the borough and encourage development where there are sufficient vacancies in schools.



Creating safe, healthy and inclusive communities

Do you agree with the proposed policy directions? If you disagree with any of the policy directions, please tell us more.

Of respondents who answered the question: 15 said yes, 4 said no and 3 don't know [16 did not answer the question]

- FORCE welcomes the inclusion of theme in the Direction of Travel, but believe that greater emphasis should be placed on the importance of borough's open and wild spaces in promoting physical and mental health, than aspects such as Healthy Streets, fast food outlets, sports and health facilities.
- Crane Valley Partnership want the Local Plan to recognise health benefits of convenient access to Borough-wide network of connected high quality open spaces.
- Need to understand underlying causes of variations in health of residents - including diet and lifestyle factors, quality of housing, mental health impacts of noise.
- Ensure Public Health is consultee on Local Plan.
- Two respondents referred to increasing walking, including recreational walking to improve health and stopping cars and vehicles across the borough.

Should it be easier to change use from other land uses to community uses?

Of respondents who answered the question: 9 said yes, 2 said no and 7 don't know [20 did not answer the question]

- Limited number of responses to this question, but general support depending on the need/circumstances. Change of use of buildings was supported, but not green space unless related to the functional use of the green space. Change of use to a school was considered to be controversial by one resident due to pollution impacts.
- A respondent felt that accommodating a community use should not be to the detriment of providing another facility (i.e. a retail unit) if it didn't provide much community value. Another felt change of use of an unused retail unit would be acceptable.

Should policy strongly resist more takeaways in areas in proximity to schools?

Of respondents who answered the question: 15 said yes, 2 said no and 2 don't know [19 did not answer the question]

- Majority support resisting more takeaways, particularly in areas with high levels of obesity. Consider further control of advertising.
- Free school meals suggested.
- SSA Planning representing KFC felt that the existing policy was not targeted enough, that unhealthy food could be purchased from a range of use classes not just takeaways.

- A respondent felt these restrictions are not appropriate in a democracy.

Do you have any other suggestions on how planning can promote or contribute to creating places and an environment that is conducive to weight loss and active lifestyles?

- Sport England advocate the protection of existing sports facilities and support new provision where needed.
- Department for Education comment that assessments for proposals affecting existing open space, sports and recreational buildings and land should comply with the NPPF. Advice offered on content of forthcoming evidence base.
- Several respondents felt that promotion of walking, cycling and public transport and restricting car use was key.
- Support for protection of open space, dual use of school facilities, outdoor gyms, play grounds and playing fields.
- A respondent felt that monies should not be spent on promoting healthy lifestyles, but rather on meeting basic care needs.
- A respondent felt that delivering adequate housing with sustainable access to jobs and facilities, including open space and recreation, is the key means by which planning can promote health.

Are there other opportunities through planning to promote healthy lifestyles?

- Responses reflect the view that planning on its own cannot result in healthy lifestyles. Education to enable individuals to make good lifestyle choices is considered very important.
- Suggestions made included:
 - Improve active travel and public transport and reduce car use.
 - Provide access to greenspaces, in addition to the Royal Parks and protect areas used for recreation.
 - Provide sporting facilities, specifically swimming pools and an ice rink
 - Encourage schools, employers and retailers to provide opportunities for good food choices.
 - Ensure new developments are permeable and link up
 - Restrict food and drink uses based on lack of viability in areas of deprivation.
- Support for Public Health England Guidance.

How can we ensure convenient and welcoming development with no disabling barriers, providing independent access without additional undue effort, separation or special treatment?

- Several respondents felt that the separation of walking and cycling, promotion of public transport and reduction in car use was important.
- Importance of good design.
- Liaison with the disadvantaged.
- The PLA commented that there must be continuing reference for riverside developments to provide riparian life-saving equipment where required.

General comments

- The Council should continue to oppose expansion of Heathrow and increase in flights.

Overall officer comment on responses to 'Creating safe, healthy and inclusive communities'

There was general support for the initiatives proposed however, many respondents acknowledged that planning alone cannot resolve many of these concerns discussed and that there shouldn't just be a focus on fast food outlets.

Could consider a shift in the emphasis of the Local Plan policies to the important role of open and green spaces, as opposed to focusing on more urban and indoor facilities (fast food outlets, sports and health facilities) in encouraging healthy lifestyles.

Call for Sites

Sites suggested and potential use (nature of site promoter)

- LGC Queens Road, Teddington for a mix of employment and residential uses (put forward on behalf of landowner LGC Teddington)
- Greggs Bakery, Twickenham for residential use (put forward by London Square Developments)
- Greggs Bakery was also submitted by other residents who either support a residential or wished to submit their objection to its inclusion to the Call for Sites list.
[For context: London Square Developments sent letters to residents in the area notifying them about the Council's Call for Sites and encouraging them to provide feedback on the type of development they would like to see on the site]
- Twickenham Bus Stand, Station Yard for residential use and the Fulwell Bus Garage for continued bus usage alongside residential use (put forward by TfL Commercial Development). CPRE also suggested the site around the Fulwell Bus Garage.
- Maintaining the current Site Allocation for Richmond Athletic Ground and amending to reflect redevelopment aspirations including enabling residential use (put forward by Richmond Athletic Association)
- Whitton Community Centre and car park for residential use (put forward by a resident)
- Anywhere there is a large supermarket and car park or business park locations could include carparks at Sainsburys or MacDonald's for retail, leisure, office, warehousing and housing (put forward by a resident)
- Old Deer Car Park, Richmond (and many other council car parks) for residential and office use (put forward by a resident). Similarly, CPRE suggested that the carpark for Sainsburys in Hampton to be converted to green space and a low-rise retail unit.
- Harlequin Football Club for a mixed residential, commercial, retail, community uses as well as the new sports stadium (linked with the and the adjacent Twickenham Central Depot site) (put forward by Harlequin Football Club)
- CPRE suggested other sites including Lower Teddington Road, Stanton Avenue, Homebase North Sheen, North Sheen near the station where there are garages and a surface car parks which could be better utilised for car free developments. They also identified Kew Retail Park and the Oldfield Road light industrial site for more intensified use including commercial and residential.
- Arlington Works, Twickenham for a mixed use of residential and commercial/industrial/office (put forward by landowner)
- Land at the back of 102 Sheen Road and adjacent to 2 Sheen Park, Richmond (put forward by a resident)
- The extended rear gardens of no's 271/273 Hanworth Road, Hampton for residential use (put forward by two residents)
- Green spaces for leisure (put forward by a resident)
- Kneller Hall, Kneller Road Twickenham referring to the current Site Allocation, for a mix of uses including residential (put forward by the Defence Infrastructure Organisation on behalf of the landowner the MoD)
- The existing Stag Brewery site allocation to be varied to reconsider the consolidation of the existing secondary schools in the area. To facilitate this a site allocation should be provided to Mortlake Station, Richmond Park Academy and Christs School (put forward by Mortlake Brewery Community Group)

- Bridge Farm Nursery, Hospital Bridge Road, Whitton for the relocation of the Bishop Perrin School or affordable housing for older people (put forward by a resident)
- St Margaret’s Business Centre for residential use (put forward by Sheen Lane Developments)
- Land to the west of Stain Hill West Reservoir, Hampton Water Treatment Works and Hydes Field, land north of Hampton Water Treatment Works, Upper Sunbury Road for residential or mixed use development (put forward by Thames Water)
- Former Thames Water operational land adjacent to West of Sunnyside Reservoir, Lower Hampton Road, Hampton for residential use (put forward by the landowner and another resident)
- The current Site Allocation SA 19 Richmond Station should be redrafted to ensure development will adequately recognise the architectural and historic interest of the site (put forward by a local resident) , given the failure of the Council and the Inspector to properly or adequately consider and respond to such issues put forward during the preparation of the 2018 Local Plan in respect of SA 19. CPRE also suggested this site as car parking at Richmond Station could be replaced with commercial and/or retail development
- The Mortlake with East Sheen Society has advised the need to review the existing Site Allocations including Stag Brewery as well removing SA25 Mortlake and Barnes Delivery Office. Furthermore, it was advised that comprehensive redevelopment still required, and that detailed planning is still required for SA27 Telephone Exchange and 172-176 Upper Richmond Road West. Mortlake Station, Richmond Park Academy and Christ’s School should also be included as Site Allocations.
- *[Also note other types of sites and specific sites were generally mentioned under ‘Scale of the challenge, opportunities and setting the Direction of Travel’.]*
- *[Also note Udney Park Playing Fields (mentioned by residents and local group) some respondents supported for Local Green Space designation and some respondents supported development, including in comments under ‘Scale of the challenge, opportunities and setting the Direction of Travel’ and ‘Protecting what is special and improving our areas’.]*

We would like to know whether there are any barriers to delivery, such as infrastructure constraints? And if yes, do these affect any particular or common types of development, such as small sites?

Of respondents who answered the question: 10 said yes, said 1 no and 3 don’t know [22 did not answer the question]

- Most respondents did not specify or know of any barriers to development.
- One respondent noted that the proposal would involve shared access with a high school which may result in safety concerns.
- Another identified that flooding may be a constraint as the site is located in Flood Zone 2 and that the site contained significant trees
- A respondent has stated that Council is claiming that site is Green Belt land
- A respondent has stated there is involvement of multiple land owners
- Another resident noted that the current use of the site would need to be relocated (however it could be relocated to the adjacent school site)
- There is a potential need to upgrade services including sewerage and electricity grids to accommodate growth.

General comments

- Historic England emphasis on considering the historic environment early in site assessments.
- A resident mentioned that Council should consider underground carparking to free up land for redevelopment.
- Most respondents advised that the land is available now or available subject to planning permission.

- There were references made by numerous respondents about car lite developments to help facilitate potential development.
- *[Also note DfE emphasis on clarifying requirements for the delivery of new schools through site allocations in response under ‘Securing new social and community infrastructure to support a growing population’]*

Overall officer comment on responses to ‘Call for Sites’

- There were various locations throughout the Borough which residents, landholders and business believe warrant a site allocation.
- Predominately it was suggested that these sites should be residential although some have suggested a mixed use on the site.
- The scale development proposed was mixed with some suggesting two new residential dwellings to hundreds of flats.
- It is evident that the Stag Brewery site while has received some support from the developers and community members, there is much community objection to the proposed development on site.

Other general comments (not related to specific consultation questions)

- TfL set out general context on their comments, made from their role as a transport operator and highway authority, and referred to the advanced stage of the draft London Plan in responding to consultations.
- Details provided on the National Grid electricity transmission system, identifying the assets which pass through the borough – routes of two 275Kv underground cable.
- Spelthorne Borough Council note additional demand on local infrastructure and transport expected given scale of development planned, and welcome further engagement, along with Surrey County Council who recently produced transport modelling for Spelthorne’s Preferred Options Local Plan.
- The Marine Management Organisation (MMO) set out general details on their responsibilities for marine licensing, marine planning (including the draft South East Inshore marine plan), and minerals and waste plans and local aggregate assessments, which may need to be referred to in planning documents.
- The Old Deer Park (ODP) Working Group urge an update to the 2015 Policies Map to show amendments/additions to boundaries and site-specific Allocations adopted since then including adjustments to the boundaries of designated MOL and Public Open Space in ODP, potential adjustments to the boundary of the Historic Registered Park, the boundary of the area covered by the ODP SPD and the boundary of the ODP Conservation Area, to remedy significant and long-established anomalies. Also requests to review the substantially deficient/defective draft Pools-on-the-Park, Richmond Statement of Significance for SA 22.
- Friends of Richmond Green indicated they support the comments made by Prospect for Richmond.
- Udney Park Playing Fields Trust encouraged the Council to be bold, defend and uphold the Local Plan protection of UPPF. Urge the Council to resolve the future of UPPF as a long term sustainable self-funded community facility.
- Some statutory consultees made no comments – Natural England and Surrey County Council.

Consultation from 24 February until 5 April 2020

Published by LBRuT November 2020

Please note, the responses below are exactly as received from the respondents and have not been edited by the Council.

They are not alphabetically ordered or in any other order of priority.

The schedule shows where any personal information within responses relating to contact details, particularly full address data, has been removed stating e.g. *[personal details removed for data protection]* or shown as black rectangles in the appendices.

Appendices have been made available separately where due to the length or nature of responses they could not be captured within the main Schedule. The officer references added are shown in the Schedule as *[See Appendix....]*

Respondent reference no.	Name / Organisation
1.	David Mattes
2.	CBRE on behalf of LGC Ltd, Teddington
3.	Katie Parsons, Historic England
4.	Lambert Smith Hampton on behalf Metropolitan Police Service
5.	Helen Monger, London Parks & Gardens Trust
6.	Marine Management Organisation
7.	Michael P Martin, Milestone Commercial
8.	Sharon Jenkins, Natural England
9.	Shirley Meaker
10.	Stuart Morgans, Sport England
11.	Surrey County Council
12.	Tim Lester
13.	Heather Archer, Highways England
14.	Mayor of London
15.	Transport for London (TfL)
16.	Avison Young on behalf of National Grid
17.	Hannah Bridges, Spelthorne Borough Council
18.	Phoebe Juggins, Department for Education
19.	DP9 Ltd on behalf of London Square Developments

Respondent reference no.	Name / Organisation
20.	Gary Backler, Friends of the River Crane Environment (FORCE) (and supported by Crane Valley Partnership)
21.	Lucy Wakelin, Transport for London (TfL) Commercial Development
22.	Jimmy Wallace, Richmond Athletic Association
23.	Peter Willan & Paul Velluet on behalf of Old Deer Park Working Group
24.	Paul Velluet
25.	Phoebe Quayle
26.	Hannah Lukacs
27.	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)
28.	Alice Shackleton on behalf of The Kew Society
29.	Richmond Cycling Campaign
30.	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs
31.	Tim Catchpole on behalf of the Mortlake with East Sheen Society
32.	Mark Jopling on behalf of Udney Park Playing Fields Trust

Respondent reference no.	Name / Organisation
33.	Tim Catchpole on behalf of the Mortlake Brewery Community Group
34.	DP9 Ltd on behalf of Harlequin Football Club Limited
35.	Alice Roberts, CPRE London
36.	Rebecca Marwood, NHS Property Services Ltd
37.	John Waxman, Crane Valley Partnership
38.	Justine Langford on behalf of Ham and Petersham Neighbourhood Forum
39.	Solomon Green
40.	Jamie Edwards
41.	Anthony Swan
42.	Jeremy Gill
43.	Paul Hart Prieto
44.	Roger Cutler
45.	Sally Beeson
46.	Joan Gibson
47.	Trevor Rowntree
48.	Roger Wilson on behalf of Roger Wilson Consulting LLP
49.	Margaret Edwards
50.	John O'Brien
51.	Su Bonfanti
52.	Winston W Taylor
53.	Richard Woolf on behalf of McDaniel Woolf Architects
54.	Paul Luton
55.	Jon Rowles
56.	Rob Kennedy, Environment Agency
57.	Tom Clarke, Theatres Trust
58.	Michael Atkins, The Port of London Authority
59.	Paul Massey
60.	Kingsley Izundu, Royal Borough of Kingston upon Thames
61.	Tom Minns

Respondent reference no.	Name / Organisation
62.	Kathleen Massey
63.	Carol Rawlings
64.	Johanna Eschbach on behalf of RiBRA (Richmond Bridge Residents Association)
65.	SSA Planning Limited on behalf of Kentucky Fried Chicken (Great Britain) Limited
66.	Robert Philip Cunliffe
67.	William Mortimer
68.	Mark Jopling
69.	Geoff Bond on behalf of Ham & Petersham Association
70.	Melissa Compton-Edwards
71.	Patrick Wood

Table 1: All respondents to the engagement

Detailed comments as received:

Respondent reference no.	Name / Organisation	Detailed comments
Introduction		
Comments about the Introduction		
14	Mayor of London	<p>As you are aware, all Development Plan Documents in London must be in general conformity with the London Plan under section 24 (1)(b) of the Planning and Compulsory Purchase Act 2004. The Mayor has afforded me delegated authority to make detailed comments which are set out below. Transport for London (TfL) has provided comments, which I endorse, and are attached at Annex 1. [See respondent number 15 for TfL comments]</p> <p>The Mayor is pleased to have the opportunity to comment on this early, non-statutory consultation to inform the development of Richmond's new Local Plan. This letter provides advice and sets out where Richmond should alter its proposed approach to be more in line with the Intend to Publish London Plan.</p> <p>The draft new London Plan</p> <p>As you know, the Mayor published his draft new London Plan for consultation on 1st December 2017. The Panel's report, including recommendations, was issued to the Mayor on the 8th October 2019 and the Intend to Publish London Plan was published on 17th December 2019. The Mayor has received the response from the Secretary of State to his Intend to Publish London Plan and is considering his response. In due time, my officers will be happy to discuss any implications for Richmond's Local Plan.</p> <p>Publication of the final version of the new London Plan is anticipated in the Summer, at which point it will form part of Richmond's Development Plan and contain the most up-to-date policies.</p> <p>Richmond's new Local Plan will be required to be in general conformity with the new London Plan. The Intend to Publish London Plan and its evidence base are material considerations in planning decisions.</p> <p>General</p> <p>The Mayor recognises that this is a non-statutory consultation and is a pre-cursor to the formal Regulation 18 draft of the Local Plan which is to follow. The ten themes identified early in the Direction of Travel document are welcome and give an indication of what the strategic priorities and ambitions are for the forthcoming Local Plan. It has only been two years since the adoption of Richmond's most recent Local Plan and since then there have been many new challenges, changing priorities and key shifts in the evolving planning landscape which Richmond intends to address. The Mayor welcomes Richmond's early thinking and work on a new Local Plan and recognises this is important to address housing delivery and ensuring the demand for other land uses can be met.</p>
19	DP9 Ltd on behalf of London Square Developments	<p>Comments on the Direction of Travel Document</p> <p>We consider the Local Plan Direction of Travel Consultation document to be an important and positive first stage in determining the borough's vision for growth and future development. It rightly identifies that much has changed since adoption of the latest Local Plan in 2018, particularly in terms of increased housing delivery targets. We provide our comments on the proposed direction of travel below, including opportunities to meet stated objectives.</p> <p>Why do we need a new Local Plan? – p.4</p> <p>Reason 1</p> <p>We support Richmond's actions to tackle the climate emergency and supports planning policy that will minimise carbon emissions, waste and pollution. Environmental impacts arising from pollution is particularly relevant to the subject Site. Its current industrial use has the potential to generate high levels of commercial vehicle traffic and therefore significant air quality impacts to surrounding residential uses. As part of the approach to tackling pollution, consideration must be given to protecting established residential communities from poor air quality.</p> <p>Reason 2</p>

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		<p>We support the provision of infrastructure that will ensure better connectivity and encourage sustainable modes of transport. As part of this approach, development must be directed to appropriate locations. In the case of the subject Site, it is not sustainably located for large-scale employment use, particularly in light of its poor access via residential roads.</p> <p>Reason 3 We support Richmond’s consideration of how it will meet the new increased housing targets proposed in the draft London Plan. We consider that the Site should be assessed for this purpose, particularly in light of the proposal which seek to deliver 116 new homes including circa 57 units of affordable housing (49% of units).</p> <p>Reason 4 We support Richmond’s approach to ensuring alignment with the latest national planning policies, guidance and legislation.</p> <p>What do we already know? – p. 6 The consideration of viability through the plan-making process, and whether policies will stop development coming forward, is supported. This is particularly relevant to the sites, such as the subject Site, where restrictive policies may halt otherwise appropriate development from coming forward. Viability and market signals must also be considered in the preparation of policies which seek to protect certain uses. In the case of the subject site, its employment use is protected by adopted policy despite it having been demonstrated that the redevelopment of the Site for similar employment generating uses would be an unviable prospect. Without this approach, sites around the borough are at risk of long-term vacancy. This approach also presents a missed opportunity to redevelop brownfield sites to meet housing need.</p>
22	Jimmy Wallace, Richmond Athletic Association	<p>To provide a brief background, RAA was incorporated in 1886 and is responsible for managing the Richmond Athletic Ground, which is located within the Old Deer Park, and has been used for hosting sporting activities ever since. The ground is home to two of the most recognised rugby clubs in the country (Richmond Rugby & London Scottish) and is used by hundreds of men, women, youth and mini rugby players for matches and training purposes throughout the season.</p> <p>In addition to the several thousand members of the two Rugby Clubs, RAA hosts a number of Rugby 7s tournaments such as the Lloyds Insurance 7s, Surveyors 7s, Law Society 7s, Middlesex 7s Festival and Summer Social. In addition, it has strong connections with the local business community and also provides facilities for the adjacent Falcons Boys School. Given the level of current usage and demand experienced by RAA, together with the condition and age of the existing facilities, it is evident that significant improvements are required if this vital facility for the local community is to continue to sustain itself and thrive. Whilst the facility is heavily used and makes a vital contribution to local health and well-being, it does not generate any surplus income that could be used to meaningfully invest in the provision of the significant enhancements that are needed to maintain this contribution. As such, it is clear that other funding solutions must be considered to deliver the required investment and uplift that the facilities require.</p> <p>In 2017, Richmond Rugby established a full-time Community Department which now provides rugby and sports coaching in over 20 primary and secondary schools, primarily in the state sector, in the borough of Richmond and further afield into west London. In addition, the Community Department formed a partnership the following year with HM Young Offenders Institution in Feltham to provide rugby coaching to juvenile offenders aged between 15 and 18, and this on-going programme was the first-ever outside sports project to be offered for this age group at the institution. More recently, the Community Department has been offered a sizeable grant from the Met Police to provide sports coaching as an after-school activity to 10-11 year olds in partnership with the MCC Foundation.</p> <p>With this in mind, the RAA is continuing to investigate how they can improve the existing facilities at the ground in order to meet the increasing demand from the local community and secure the future of rugby (and other sports and community uses) on the site. In recent years, discussions regarding potential redevelopment proposals have been undertaken with LBRuT along with meetings with local community groups and the feedback received has been positive. Accordingly, the RAA is currently in the early stages of developing a revised masterplan for the Athletic Ground involving improved facilities including enhanced sport facilities and proposals for better public access and enabling uses to fund the delivery of the proposed development. The RAA anticipates resuming pre-planning discussions with LBRuT, the Greater London Authority (GLA) and other key stakeholders in the short term.</p> <p>In the context of its redevelopment aspirations, the RAA has previously engaged in a number of LBRuT’s planning consultation exercises, including in relation to the adopted Local Plan, and more recently, consultation on the draft Planning Obligations SPD and draft Transport SPD.</p>

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		<p>The consultation process provides a positive opportunity to continue to discuss and align the aspirations of the RAA, LBRuT and the local community in local plan making policies to assist in the delivery of improved sports facilities as well as enhanced public access to these facilities.</p> <p>We support the statement on p. 12 that the vision and new Local Plan will be written positively and the acknowledgement that the borough will need to change to accommodate future growth. Ten themes are then identified and will inform the emerging vision for growth. We are supportive of these themes as the starting point for the preparation of the vision. This includes an objective to protect and improve the borough’s Heritage, Culture, Green infrastructure and open land. We think this should also recognise the requirement to make best use of resources such as existing open land (e.g. playing fields) to ensure that these can be enhanced to better meet the needs of residents.</p> <p>See also general comments on the Vision as below.</p>
23	Paul Velluet & Peter Willan on behalf of Old Deer Park Working Group	<p>1.1 The Old Deer Park Working Group (the Group) comprises representatives of The Richmond Society, The Kew Society, The Friends of Richmond Green, The Friends of Old Deer Park and The St Margaret’s Estate Residents Association. This submission represents the joint response from the Group.</p> <p>1.2 The Group was formed in 2012 in recognition of the particular ecological, historical and recreational importance of the Old Deer Park and has since then worked for encouraging and securing the preparation of a coherent strategy for the effective conservation, development and management of the Park. In June, 2012, the Group published its report: <i>The Old Deer Park, Richmond - Re-connecting the Town to its local park - Realising an under-recognised parkland asset – A framework for conservation and enhancement</i>. Since then, it has made a number of submissions to the Council on related issues. In this connection and importantly, the Group worked collaboratively with the Council and its consultants on the preparation of the <i>Old Deer Park Supplementary Planning Document</i> (as published in March, 2018). The Group has also worked, and continues to work, collaboratively with the Council on the planning and implementation of projects for the enhancement of the Park, including the recently completed, award-winning scheme for improvements at and adjacent to the Park Lane entrance to the Old Deer Park Car-park.</p> <p>1.3 The Old Deer Park Working Group notes that the present consultation follows the formal adoption of the <i>Richmond-upon-Thames Local Plan</i> in July, 2018, in which it is stated (at paragraph 1.1.1) that the Plan sets out the Council’s policies and guidance for the developments of the Borough for the next fifteen years (i.e. until July, 2033) and identifies where the main developments will take place, and how places within the Borough will change, or be protected from change, over that period. Importantly, too, the Council has only just published (on 12th March) a notification regarding boundary adjustments to the still yet to be published <i>Polices Map</i> attached to the present <i>Local Plan</i>.</p> <p>1.4 In this connection, the Group notes the statement in Appendix 3 of the consultation document that the Council anticipates the new <i>Local Plan</i> being adopted in 2024 at which point it will supersede the existing <i>Local Plan</i> of 2018.</p> <p>1.5 The Group notes that the Council’s has put forward four reasons for preparing a new <i>Local Plan</i> (<i>Local Plan Direction of Travel Consultation</i>, page 4) so soon after the adoption of the present <i>Local Plan</i>. Whilst the Group recognises the importance of the four cited reasons and that they should be reflected in adopted planning policy, it would question whether the Council having adopted a <i>Climate Emergency Strategy, 2020-2024</i> in January this year actually ‘necessitates a new strategic vision for the future of the Borough and a new-place-making strategy for how this will be achieved’, rather than simply building upon the existing <i>Local Plan</i> – only very recently adopted in its entirety.</p> <p>1.6 Similarly, the Group questions whether growth in population in the Borough and related matters justify the preparation of an entirely new <i>Local Plan</i> so soon after the adoption of the present <i>Plan</i>.</p> <p>1.7 Similarly too, the Group questions whether the anticipated housing target for the Borough set out in the still yet to be formally adopted draft <i>London Plan</i> of 2019 necessitates the preparation of an entirely new <i>Local Plan</i>.</p> <p>1.8 Finally, the Group seeks clarification of the significant changes which the Council alleges have been made by Central Government to planning legislation, policy and guidance since July, 2018 (and the anticipated changes), which are put forward as further justification for preparing an entirely new <i>Local Plan</i>.</p> <p>1.11 Without necessarily accepting or rejecting the factors that the Council has put forward in justifying the preparation of a wholly new <i>Local Plan</i>, the Group welcomes the opportunity of putting forward a number of issues relating to the care, conservation, development and management of the Old Deer Park for consideration in the preparation of a new <i>Local Plan</i> in response to the Council’s invitation. These primarily relate to the failure of the Council and the</p>

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		<p>Inspector to properly or adequately consider and respond to significant and long unresolved designations relating to the Old Deer Park put forward by the Group in the consultations and submissions leading to the adoption of the <i>Richmond-upon-Thames Local Plan</i> in July, 2018 (and in the consultations leading to the adoption of the <i>Old Deer Park Supplementary Planning Document</i> in March, 2018. The preparation of a new <i>Local Plan</i> provides the opportunity to review and resolve these particular anomalies and omissions.</p>
24	Paul Velluet	<p>1.1 The comments below are submitted in an entirely independent capacity based on long familiarity with planning and development issues in the Borough and direct involvement as a Borough resident in the Council’s plan-making process and in the interpretation and application of the Council’s planning policies and guidance for over forty years. My professional experience as an architect - working in both private practice and the public sector specialising in building conservation and development in historic areas - has been complemented by serving in past years on the Council’s former Conservation Areas Advisory Committee, by serving for four years as Chairman of The Richmond Society and fifteen years as Chair of its Conservation, Development and Planning Sub- Committee, by serving for ten years as Regional Architect and Assistant Regional Director of English Heritage, London Region, and by serving on the RIBA’s Planning Group and Awards Group and on The Thames Landscape Strategy Panel of the former Royal Fine Art Commission.</p> <p>1.2 I note that the present consultation follows the formal adoption of the <i>Richmond- upon-Thames Local Plan</i> in July, 2018, in which it is stated (at paragraph 1.1.1) that the Plan sets out the Council’s policies and guidance for the developments of the Borough for the next fifteen years (i.e. until July, 2033) and identifies where the main developments will take place, and how places within the Borough will change, or be protected from change, over that period. Importantly, too, the Council has only just published (on 12th March) a notification regarding boundary adjustments to the still yet to be published <i>Policies Map</i> attached to the <i>Local Plan</i>.</p> <p>1.3 In this connection, I note the statement in Appendix 3 of the consultation document that the Council anticipates the new <i>Local Plan</i> being adopted in 2024 at which point it will supersede the existing <i>Local Plan</i> of 2018.</p> <p>1.4 I note that the Council’s has put forward four reasons for preparing a new <i>Local Plan</i> (<i>Local Plan Direction of Travel Consultation</i>, page 4) so soon after the adoption of the present <i>Local Plan</i>. Whilst I recognise the importance of the four cited reasons and that they should be reflected in adopted planning policy, I would question whether the Council - having only adopted a <i>Climate Emergency Strategy, 2020-2024</i> in January this year - actually ‘necessitates a new strategic vision for the future of the Borough and a new-place-making strategy for how this will be achieved’, rather than simply building upon the existing <i>Local Plan</i> – only very recently adopted in its entirety.</p> <p>1.5 Similarly, I would question whether growth in population in the Borough and related matters justify the preparation of an entirely new <i>Local Plan</i> so soon after the adoption of the present <i>Plan</i>.</p> <p>1.6 Similarly too, I would question whether the anticipated housing target for the Borough set out in the still yet to be formally adopted draft <i>London Plan</i> of 2019 necessitates the preparation of an entirely new <i>Local Plan</i>.</p> <p>1.7 Finally, I would value clarification of the significant changes which the Council alleges have been made by Central Government to planning legislation, policy and guidance since July, 2018 (and the anticipated changes), which are put forward as further justification for preparing an entirely new <i>Local Plan</i>.</p> <p>1.9 The posing of such questions, clearly suggests that the present Administration is open to being persuaded to set aside well tried and tested protective policies in favour of purely short-term economic and other objectives.</p> <p>1.10 Without necessarily accepting or rejecting the factors that the Council has put forward in justifying the preparation of a wholly new <i>Local Plan</i>, I welcome the opportunity of putting forward a number of issues relating to the future of Richmond Station for consideration in the preparation of a new <i>Local Plan</i> in response to the Council’s invitation. These primarily relate to the failure of the Council and the Inspector to properly or adequately consider and respond to significant and long unresolved issues which I put forward in the consultations and submissions leading to the adoption of the <i>Richmond-upon-Thames Local Plan</i> in July, 2018. The preparation of a new <i>Local Plan</i> provides the opportunity to review and resolve these particular anomalies and omissions.</p> <p>1.11 However, I remain apprehensive that the stated commitment to carrying out a review of existing Green Belt, Metropolitan Open Land and Other Open Land of Townscape Importance (‘to fully inform our spatial strategy and approach to growth and development in the Borough’) to which reference is made on page 39 of the consultation document, and reflected in Questions 11 to 17 of the questionnaire, raises the considerable risk the potential de-designation of many, much valued open spaces of the Borough as an unintended consequence of a simplistic search for growth.</p>

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27	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond	<p>1. The consultation cites four reasons for early revision to the Local Plan adopted in 2018:</p> <ol style="list-style-type: none"> a. Climate Change Emergency and Air Quality Action b. Population Growth c. New London Plan d. Changes to National Planning Policies <p>2. We do not believe the Local Plan Direction of Travel document provides sufficient evidence to demonstrate the current Local Plan is not fit for purpose today or over the next 10 years in meeting growth, social, economic and environmental objectives. It was only adopted in July, 2018, and in its entirety in March, 2020. The case has not been made that the direction of travel or the objectives themselves have changed sufficiently to warrant a new Local Plan.</p> <p>3. Circumstances and choices as to how best to meet the objectives change all the time. But we are not convinced that the recently adopted Local Plan 2018 is sufficiently deficient in dealing efficiently and effectively with the four cited topics to justify a new Local Plan. There are subsidiary tools, such as the preparation and adoption of Supplementary Planning Documents, that we believe could remedy the changing economic, social and environment challenges through the life of the existing Local Plan, whose term was predicted in only very recent years. There are ways of dealing with new legislation or new Government policy that may otherwise conflict with adopted Local Plan policies. The four cited topics are not new by any means and surely would have been anticipated when the Council was preparing the current Local Plan. We are concerned that no sooner is the proposed new Local Plan adopted in 2024 that another will then be deemed necessary and that the 15-year lifetime of such plans in reality is more like 5 years. This hardly provides stability for the implementation of planning policies and instead creates uncertainty and opportunism.</p> <p>4. Preparing a new Local Plan in order to keep up to date (the reason given for the new Local Plan) suggests that a new Local Plan could itself be out of date should the current corona virus epidemic continue for any length of time. We suggest that under the current circumstances consideration be given to the Direction of Travel process being deferred.</p> <p>5. For the avoidance of doubt we are not saying the four topics cited above are not important - they are, and we endorse the Council's concern that they be recognised in planning policy.</p> <p>6. We note that the proposed new plan focusses on growth, and we are not aware growth predictions for the Borough of Richmond-upon-Thames have changed significantly from those incorporated in the current Local Plan. The chart on page 7 of the Direction of Travel document projects the population of the borough increasing from around 202,000 in 2020 to 215,000 in 2030 or 6.4% over ten years. What is changing is awareness of the environmental issues facing us from global to local level and hence the need to focus increasingly on growth being sustainable and the possibility of limiting or even discouraging any growth. But the Direction of Travel document seems to be seeking increased flexibility to facilitate growth by loosening the constraints that the current Local Plan rightly provides to protect the environment. If anything, the Direction of Travel document seems to promote growth while putting at risk the quality of the environment. In our view the protection of the environment should be a key objective and not the poor cousin of growth and treated as one of several constraints to growth. The precautionary principle is essential under the circumstances.</p> <p>7. We refer to growth in the previous paragraph as overall growth reflected by population. But within the societal mix there are naturally some elements growing and others waning. It is important to maintain a balance. For example, in Central Richmond the mix of retail, office and residential use is an important balance that changes over time.</p> <p>8. We believe evidence is essential when formulating planning policy and we welcome the Council's references to the gathering of specific evidence that is needed. The Direction of Travel document is lite on evidence and that is not unexpected at the early stages of preparing a new Local Plan. What evidence we are aware of we do not believe supports proposals to dilute current planning policies. The absence of new evidence means we are not able to draw definitive conclusions on proposed new policies or significant revisions to existing policies and we ask that this be taken into account when considering our response.</p>

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		<p>Response to the Specific Themes in the Direction of Travel document</p> <p>9. Our response here focusses on the heart of Richmond but we realise the Direction of Travel document covers other areas of the Borough necessitating consideration in the preparation of a new Local Plan. We believe it is essential when considering planning for Richmond that Richmond Green and the Riverside are included in the spatial scope. Together we refer to these as Richmond comprising the Conservation Areas for Central Richmond and Richmond Green and relevant parts of the Conservation Area for the Riverside. The use, character and value of the three components of Richmond are very different but it is this diversity, side by side in a relatively small area, that is so valuable. The whole is greater than the sum of the parts.</p> <p>10. We suggest the need is to ensure Central Richmond is attractive for residents, visitors, businesses and employees. The Riverside and the Green add value directly for residents and visitors and indirectly for businesses and employees. It is essential that the different characteristics of the three areas are maintained, not only to provide Richmond with a viable future which is differentiated from other competing towns but to sustain the character, quality and historic significance of the Riverside and the Green for future generations.</p> <p>11. As we write, the corona virus epidemic is entering a severe phase - necessitating a lock-down from which some businesses will not survive and others will be materially changed. Meanwhile, the impact on retail of internet shopping continues. The way of life for residents, visitors, businesses and employees will probably change significantly over the next few years and probably over the long term. The extent of change and its direction is impossible to predict reliably at this moment. The Direction of Travel document suggests policy options. We explained in our response to the introduction why we are concerned at attempting to prepare a new Local Plan at this time. In addition, the uncertainty and shortage of evidence by which to judge the options presents a particular difficulty for us in responding to the consultation. We are concerned that under these circumstances our comments can only be tentative but that this then leaves wide open scope for interpretation by the Council that we might not share. In saying this we are not intending disrespect of the Council in any way.</p> <p>12. Given the inevitable tentative nature of our response under the current circumstances, we should make it clear that we may wish to make changes to our responses.</p> <p>13. In one way or another all the themes in the Direction of Travel document are relevant for Richmond. We discuss each of them in turn. <i>[Responses are set out in the relevant sections in this table.]</i></p>
28	Alice Shackleton on behalf of The Kew Society	<p>1. The Kew Society ("TKS") represents some 800 residents of Kew. As an amenity society it is established for the public benefit and its objectives are to promote high standards of planning and architecture in Kew, to educate the public about the locality, to preserve and enhance the beauty of Kew and its village and to extend and preserve public amenities in the domain.</p> <p>2. The Council is setting in motion the process to create a new Local Plan, intended to be adopted in 2024.</p> <p>3. The Kew Society questions the need for a new Local Plan for the following reasons. The Council, in our view, has not yet made the case in this consultation document.</p> <p>4. The existing Local Plan was adopted only in July 2018 after extensive consultation and a public examination. This was a very detailed and rigorous process, in which the Inspector carrying out the public examination made few substantive amendments, an implied recognition of the quality in planning terms of the draft.</p> <p>5. The Local Plan must be in general conformity to the London Plan and the National Planning Policy Framework. Accordingly, it must be under constant review and is subject to alteration, just as the London Plan must conform to National Planning Policy Framework. This is a continuing process which is undertaken at local and London level. There is no requirement for a completely new Local Plan when changes in national or London planning policy, decisions of the courts or circumstances occur. Indeed, the Mayor of London's comments on the draft London Plan process and background set this out clearly on his website. <i>Alteration</i> meets such needs.</p> <p>6. The consultation document does not, in our view, justify the creation of an entirely new Local Plan, particularly so soon after the adoption of the July 2018 Local Plan, which was to cover the next 15 years. Clearly it is envisaged by the fact that the Local Plan is intended to cover 15 years that there will be necessary alterations – not an entirely new Local Plan. The consultation document does not explain why a new Local Plan is needed for the reasons given by the Council (Climate Emergency Strategy, projected growth in population, housing targets increased by the draft London Plan – but now at a more realistic level, changes to legislation). Why can the adopted Local Plan not deal with these?</p>

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		<p>7. The adopted Local Plan, supplemented and supported by SPDs, Conservation Area statements, Village Character areas, is the result of rigorous policy making and a wealth of expertise and long experience. We would welcome information on what the Council considers will be dealt with in a new Local Plan that could not be accommodated in this adopted Local Plan.</p> <p>8. The Council has decided on a new “vision” to inform the new Local Plan. It says “the new vision and new Local Plan will be written positively, and it will be about what you want to see rather than what you don’t” (p.12 Local Plan Direction of Travel Consultation document). What does this mean? It is not clear what it means, certainly in planning terms. If this is intended to be a fundamental change to how the Council sees the planning policy, then is this a direction of travel we would want to take?</p> <p>9. The adopted Local Plan (as all such plans) deals with protection as well as positive planning aspects of development as It must do if only to conform to strategic matters in national and London planning policy. It is not (or should not be) a question of <i>either</i> protection <i>or</i> something “you want”. Planning policy includes all aspects.</p> <p>10. The Council’s questionnaire contains questions that raise alarming possibilities : could “what you want” mean current important matters (such as shortage of affordable housing) be used to override designation of protected open lands ? These lands should, in our view, be held by the present owners as trustees for future generations. Once gone for current short-term needs and perceived needs, they are gone forever.</p> <p>11. How does this new “vision” relate to the Climate Emergency Strategy in planning terms, in ways that the adopted Local Plan does not? Again, “what you want” could well translate into something that destroys not only long evolved and tested planning policy and practice but also some protected open space which should be held for future persons.</p>
29	Richmond Cycling Campaign	<p>This is the group response from Richmond Cycling Campaign, the local branch of London Cycling Campaign, and it has been arrived at with feedback from members locally as well as from LCC head office.</p> <p>Summary In overall summary, we welcome both this consultation and this new plan. The increased focus on supporting non-car travel modes is welcome, as is the focus on wider sustainability issues.</p> <p>However, our general ‘ask’ is that these provisions are significantly strengthened in this and later revisions: if this is a plan to be used as a baseline for the next 10-20 years, it must start from the assumption that the private car should not be designed into our borough as the right way to move around, whether it is electric or not. Rather, we should ensure that the borough emerges from this exercise with a clear, robust plan to make sure that every person, everywhere in the borough, can honestly and safely make transport decisions which are low- or no-carbon, and which feel and are safe. Every time we mention or look at transport, new developments, visitors, etc., we should ask “how can people get there without a car?”</p> <p>We ask this not purely because of our general interest in walking and cycling, but because taking this approach supports a range of other crucial policy imperatives, including keeping people active, reducing borough carbon emissions, prioritisation of public transport, and maximising space available for people.</p> <p>P9: ‘what should the borough look like in 15-20 years’ time? In the next 20 years the borough should be a place where roads look people friendly rather than like car parks as people drive cars for exceptional journeys, if at all. A place where people move to and think “I don’t need a car”. A place where air quality in our town centres and schools is as good as the air in our parks. A place where children actively choose to cycle to school from year 4 or 5 in primary. A place where businesses and local Government have worked together to make our borough a beacon of community, supported by removing the barriers that many main roads form. A place where deliveries are by cargo bike or other emissions-free methods, and are consolidated and organised to maximise efficiency.</p> <p>P13: “What do you think? What challenges do we face? The key challenge that is faced in anything to do with transport is the utter dependence that many people feel they have on their cars. Our challenge will be creating a culture of walking and cycling for normal trips in the face of determined opposition that does not recognise the unfair dependence on car culture and how it dominates our entire streetscape.</p>
30	Jon Rowles on behalf of Friends of Heathfield	<p>The explanation of what a local plan is not clearly explained. We feel there is a better explanation here https://www.gov.uk/guidance/local-plans “Local plans are prepared by the Local Planning Authority (LPA), usually the Council or the national park authority for the area.</p>

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	Recreation Ground and Environs	<i>The National Planning Policy Framework (NPPF) states that the planning system should be genuinely plan-led. Succinct and up-to-date plans should provide a positive vision for the future of each area and a framework for addressing housing needs and other economic, social and environmental priorities.</i> The workforce population chart; there needs to be an exploration of the Slough and Heathrow Travel to Work Area - as this is the cause of a great amount of congestion and pollution in our borough.
40	Jamie Edwards	I don't believe the so called 'Climate Emergency' is a topic Richmond should prioritise. The UK has the best green credentials in Europe and the UK only contributes 1% of Global Co2 emissions. There are other priorities in the Borough more important. School Funding. The roads are full of potholes and there is overpopulation, with no clear strategy about providing more GP appointments or infrastructure.
42	Jeremy Gill	It seems your chief aim is to point up at every opportunity how wrong the government are about just about everything and how useless they are to anyone but the people they care about, their business associates. We do know that and we don't need you to keep reminding us, we're not stupid. Nor do we need you to keep pursuing policies designed to show how environmentally aware you are. In my opinion your slavish devotion to setting grand targets and keeping to them to the detriment of other areas of responsibility is a waste of scant resources and robs the people of this borough of a local authority capable of thinking on its feet. When public opinion on these issues reaches a tipping point whatever government of the day will suddenly develop a desire to create policy capable of satisfying this change. You frittering away money and energy by attempting to tackle these issues in relative isolation.
44	Roger Cutler	Ensure that, in planning for growth, it is essential that you do not remove any parking facilities - particularly Twickenham Embankment. You will kill off local shops, pubs, clubs & restaurants in the centre of Twickenham who depend on the ability of their customers to park nearby. Otherwise shoppers will just go elsewhere. The killer of any high street is high council tax & lack of parking spaces.
45	Sally Beeson	I very much appreciate the Council's plans for a sustainable and green Borough and the pressures on it to build on every square inch, but I feel very strongly that local residents' views always seem to be regarded as not important, when a decision made from a non elected official who isn't local, takes precedence. Decisions taken locally by local people ought to outweigh any others, which is why I think local voters feel that their voices aren't heard anyway, so think well, why bother.
49	Margaret Edwards	It makes sense to have this plan
50	John O'Brien	It does not mention how we will reduce the level of traffic gridlock which is experienced every working day. This has been exacerbated by the closure to traffic of Hammersmith Bridge. There are at least a dozen traffic grid lock black spots in the borough and nothing is being done to deal with them.
51	Su Bonfanti	I support the need to revise the Local Plan to respond to policy changes and I especially support the intention to set stretching standards and targets that will push developers big and small not to settle for 'just good enough'. You need to do this now or it will be too late to tackle climate change, pollution and the piecemeal degradation of the built environment.
52	Winston W Taylor	It raises enough questions on its own . I dont have time to give detailed replies to the questions. It would take several thousand words. One initial comment on the document as a whole. Air quality is not mentioned in the list of issues until issue 10. I recognise that it appears in some of the discussions on other issues but I dont think it is given the prominence it deserves.
53	Richard Woolf on behalf of McDaniel Woolf Architects	I'm strongly in favour of your focus on population growth, which drives all other factors governing our built environment.
54	Paul Luton	Clearly if the council has declared a climate emergency dealing with carbon footprint is the main issue.
55	Jon Rowles	"The borough is prosperous, safe and healthy" This is incorrect -in many areas there is relative deprivation, which a marked variance in health outcomes. The council stating this 'rose-tinted view' makes it much harder for local groups to obtain grants to address the very real needs in some communities like Ham, Heathfield and Hampton North.
60	Kingsley Izundu, The Royal Borough of Kingston upon Thames	Thank you for consulting the Royal Borough of Kingston upon Thames on The London Borough of Richmond Upon Thames Local Plan Direction of Travel Consultation and giving it the opportunity to comment on it. The text explaining what a Local Plan is and why Richmond Borough Council wants to hear from its residents, businesses, stakeholders is drafted in a positive user-friendly way, and this would encourage consultees to respond to the consultation questions.
63	Carol Rawlings	It doesn't say anything specific. Too generalised. Questions and comments should come after reading the local plan. However, I can't find the local plan! A clear link is needed.

Respondent reference no.	Name / Organisation	Detailed comments
64	Johanna Eschbach on behalf of Richmond Bridge Residents Association	<p>We support the need to revise the Local Plan to respond to policy changes and especially to set stretching standards and targets that will push developers big and small not to settle for 'just good enough'.</p> <ul style="list-style-type: none"> · However given the implementation date for this new Local Plan is planned for 2024, we feel it contradicts the emergency aspect of Climate Change and therefore cannot be a substitute for emergency action (ie over the next 18 months) that is critical in the borough. There needs to be new, significant policies in place before 2024. · Also, since "The Government is constantly changing planning policy, guidance and legislation" we need a plan that can be flexible enough to accommodate these changes as they appear without the need to rewrite everything again from scratch which is not a good use of the borough's resources. The base of a Local Plan should be strategic and include a 10 yr view of what the borough should be aiming for (regardless changes in political party managing the borough!) with only specific parts of this plan evolving as trends and legislation evolves (e.g. protecting conservation areas and improving high streets won't change, we need to concentrate on the parts of the plan that do require updating). · We support the council's aim to share this plan with the community for feedback. However, if the council genuinely wishes to have representative and meaningful feedback from the Community it needs to reconsider how the document is written as it is not at all accessible in its current form (way too long for anyone to read, doesn't concentrate on the key points and main changes enough, etc.). It is not the right format to share with the community at all and we have therefore found that the interest to respond to this consultation was very low.
66	Robert Philip Cunliffe	Good, clear and well written
67	William Mortimer	The document raises the issue of climate change but nowhere explains what is being done about Disaster Management. I have raised this point before especially as flooding is a major risk (witness the wretched plight of the Midlands and North this year). I have sent you before a summary of the action I believe to be necessary and included therein are the physical entities needed in the SW13 area to enable the community to be protected.
68 (a)	Mark Jopling	Will need to change to reflect the long term impact of CV-19
68 (b)	Mark Jopling	Will need to reflect changes as a result on CV-19
Does this document raise any specific equality impacts which would affect particular groups or communities of people in Richmond?		
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	<p>Parking Standards; the number of parking spaces at new developments could impact certain protected groups without careful management. Certain groups are less likely to drive – and developments with poor public transport accessibility can have a negative impact on their quality of life. We suggest that communities on the west of the borough are more likely to be commuting to work in the Slough & Heathrow TTWA than those in the east. Is there a need for better public transport to these areas? Should the proposed West London Orbital Railway be extended to Twickenham?</p>
31	Tim Catchpole on behalf of Mortlake with East Sheen Society (MESS)	No
39	Solomon Green	No
40	Jamie Edwards	Focusing on Climate change as a Top priority, detracts resources from other more essential areas that need huge improvement. Like the state of our roads. Empty shops. Litter. Crime etc.
41	Anthony Swan	Intro says "stakeholders". Unless these are identified thane cannot know if any area is being excluded. Maybe this level of detail comes later.
42	Jeremy Gill	Yes, anyone who understands scientific issues. Also anyone suffering from any of the serious environmental issues specific to the borough, such as the rising tide of anti-social behaviour in less affluent parts of the borough which the council are unwilling to acknowledge as they do not involve prestigious infrastructure projects.
43	Paul Hart Prieto	none
44	Roger Cutler	Car drivers & pedestrians are disadvantaged while cyclists benefit above everyone else. There is a lack of equality in road & pavement use.
54	Sally Beeson	<p>I think that the young and old have specific needs and should be given priority. Protecting our air quality - reducing pollution by over building and protecting our important green spaces, cultural centres and beautiful buildings, are vital for the health and well being of us all. Our Borough is stunning, let's keep it that way.</p>

Respondent reference no.	Name / Organisation	Detailed comments
48	Roger Wilson on behalf of Roger Wilson Consulting LLP	Reliance on cars and vehicles adversely affects less wealthy and socially excluded groups, and causes lack of social cohesion
49	Margaret Edwards	Currently the needs of older people are probably underrepresented for example in relation to housing needs
52	Winston W Taylor	Yes. The traveller community is mentioned. And they need to be considered as indicated in the Housing section.
53	Richard Woolf on behalf of McDaniel Woolf Architects	No. The introduction is fair and reasonable.
55	Jon Rowles	Many disadvantaged groups (BAME, Disabled) have fewer employment opportunities - and mean they are less likely to get jobs in central London which they can access by public transport. The parking restrictions proposed are likely to reduce their employment opportunities more than groups who don't have the disadvantage. A Large number of people in the west of the borough work in the Slough & Heathrow TTWA - and the council should drill down these TTWA statistics more.
60	Kingsley Izundu, The Royal Borough of Kingston upon Thames	It would be helpful if it is made clear that this document is available in other formats to help people with impaired sight or whose mother tongue is not English Language to give them confidence that the invitation to comment on the consultation document is inclusive.
63	Carol Rawlings	Cannot comment until I have read the local plan in its entirety.
64	Johanna Eschbach on behalf of Richmond Bridge Residents Association	The increasing numbers of older people makes it essential that the built environment is adapted to frail and disabled people. Meeting their needs is likely to make eg the public space more user-friendly for a range of users, eg people with buggies.
66	Robert Philip Cunliffe	No
67	William Mortimer	In particular you ask for strategic sites to be identified. I have been very disappointed in consultation about the Mortlake Brewery site that the Council has failed to understand the issues of ramming so many dwellings and a major school project into an area where movement is constrained between river and railway. If you are serious about getting people to use more public transport why have suggestions of an extended catamaran service using the historic Thames highway been ignored?
Scale of the challenge, opportunities and setting the Direction of Travel		
What challenges do you think Richmond borough faces now and in the future?		
29	Richmond Cycling Campaign	<p>We think the rising population in the borough will add pressure to a wide range of services. Specifically we are concerned that if the borough fails to immediately design and build sustainable transport options, we will live in an area blighted by even more congestion, along with the resulting risks of pollution, road danger, severance and inactivity.</p> <p>See also comments in section on Introduction (included below to assist reviewer)</p> <p><i>P13: "What do you think? What challenges do we face?"</i></p> <p><i>The key challenge that is faced in anything to do with transport is the utter dependence that many people feel they have on their cars. Our challenge will be creating a culture of walking and cycling for normal trips in the face of determined opposition that does not recognise the unfair dependence on car culture and how it dominates our entire streetscape.</i></p>
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	<ol style="list-style-type: none"> (1) building quality new homes to meet the population growth (2) Ensuring the new development is sustainable and the principle of proximity is fully embedded into plan making (3) increasing local infrastructure to meet the needs of the additional population (4) addressing poor local air quality (5) ensuring that we don't add to the global environmental problems (6) Ensuring that the borough does not just work for the wealthy, and that we provide more routes out of poverty, and enable people to advance and build a secure future for themselves and their families.

Respondent reference no.	Name / Organisation	Detailed comments
28	Alice Shackleton on behalf of The Kew Society	The challenge of accommodating protection of protected open lands and heritage assets with satisfying perceived strategic needs relating to climate change, environmental protections, housing need and population and protection of business and facilitating new forms of business activity (with re-examination of high street).
31	Tim Catchpole on behalf of MESS	In addition to the challenges mentioned there are the issues of how best to provide more affordable housing and how best to cater for orbital traffic.
38	Justine Langford on behalf of Ham and Petersham Neighbourhood Forum	<ul style="list-style-type: none"> • Achieving local and national climate change targets and decarbonising streets² • Addressing declining / changing town centres and neighbourhood centres • Achieving housing targets with high-quality, contextual, well designed and affordable development • Achieving 'Vision Zero' road safety targets. <p>Reference ² Department of Transport, UK Government (2020) Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/867242/decarbonising-transport-setting-the-challenge.pdf (Accessed: 29 March 2020).</p>
39	Solomon Green	Business rates are too high and have driven out many small businesses. This trend has been aggravated by the concessions enjoyed by charity shops. It is noticeable that a number of these now buy in and sell new goods as well as donated items. Consequently as well as enjoying favorable rates and using volunteer shop assistants they compete directly with small shopkeepers, helping to drive more out of business. Hence the detrimental increase in fast food outlets, nail bars, hair dressers, tanning salons and empty shops in the borough.
40	Jamie Edwards	Infrastructure to support existing Council Tax payers. Not focusing on so called 'Climate Emergenies'. Improving the quality of existing infrastructure for existing residents should be the number 1 priority. Roads are too busy - Not because of cars per se, but over population and building hundreds of new homes, for example Twickenham station. With no parking spots for new residents who will flood already surrounding very busy residential streets.
41	Anthony Swan	Supporting older people. Sheltered accommodation as proposed in the Udney park site would be welcomed - along with modern doctors surgery. Sports facilities in Udney Park very important to local clubs. Recycling being done and organised clearly. High street is changing. Encourage low cost premises for pop up shops and micro businesses. Local schools to engage more with the business world so that students end up with the skills businesses need. More and protected cycle lanes. Share some pavements if necessary. The Borough is very full as regards housing. Council talk about low cost workers accommodation but little actually seems to happen . Support for cross rail so local access can be sure and speedy to central London. Boris is likely to stop Heathrow expansion because the country cannot afford that and High speed rail. Demand for electric cars must be supported by charging points. Clubs and things for Youth to do in evenings must be supported. Raise Policing to stop county lines, drugs and weapons on the streets. Open Kingston police station again. Too many dangerous blue lights heading from Twickenham/Teddington. Use convicted offenders in a useful way to improve environment, plant trees. Stop Thames Water polluting eg River Crane. Encourage new Twickenham Riverside to work well. More electric buses - or even hydrogen. Support high speed internet coms green boxes Road works. Bang heads so Thames Water does communicate with Electric and Gas to minimise hole digging. ... and lots more
42	Jeremy Gill	A serious rise in the use of class A drugs and the truly damaging effect this is having on communities.
44	Roger Cutler	Rough sleepers. Excess wastage of money by the council. Therewas a perfectly good plan in place for the development of Twickenham Embankment & it has been thrown out & the money wasted. Shortage of money put into medical & social care. Money wasted on cycle lanes/routes when most cyclists just cycle on the

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		pavement endangering pedestrians. Lack of parking in the Borough causes more pollution as people drive in search & idle.
54	Sally Beeson	Pressure to build on every small spare piece of land, which brings more cars, creates pollution, noise, overcrowding of schools, doctors surgeries and amenities generally - a burden on our already congested area. The threat of a third runway still hangs over us all.
47	Trevor Rowntree	Over population. I think the issues we are facing are mostly caused by over population. There are too many people in this borough and not enough facilities.
48	Roger Wilson on behalf of Roger Wilson Consulting LLP	Stopping reliance on cars and vehicles that is causing air pollution that's killing around 9,000 a year across London, helping cause climate change that will flood London, causing ill health through lack of exercise, and causing lack social of social cohesion.
49	Margaret Edwards	Congestion and pollution caused by car usage, climate change causing floods and droughts, government wish to make local authorities totally self financing, ageing of the population and shortage of people to provide services in health, care, hospitality and trades such as building, especially after Brexit and in light of high housing costs.
50	John O'Brien	More active policing of petty crime - car theft, burglary, fly tipping. Reducing the need to travel is OK but you have to address the terrible problems of traffic grid lock by proving critical junctions (e.g Upper Richmond Road turn left to A205 - change traffic light settings; Mill hill road junction with Rocks lane - widen road by 2 feet to allow 2 lanes) AND the 20 mph speed limit on Kew Road is pure folly.
51	Su Bonfanti	How to remain somewhere a range of people can live and work, not just a rich white person's dormitory.
52	Winston W Taylor	Climate change Affordable housing Air Quality Changing behaviours over cars Maintaining Green spaces Supporting High Streets
53	Richard Woolf on behalf of McDaniel Woolf Architects	Development densities, housing specifically. Management and conservation of woodland and open spaces. Switch to the electric economy and sustainable transport.
55	Jon Rowles	- The poor financial settlement from the Government which means Richmond residents are subsidising other local authorities. - Opportunities for employment are decreasing due to loss of office space. - Pressure on industrial space - as the Heathrow supply chain can outbid local firms - Poor air quality from aviation - both directly from aircraft and road traffic generated by the airport. - Firms relocating the Slough and Heathrow Travel to Work Area to 'beat' the Mayor of London's curbs on car parking and congestion charging means that many jobs are now located in areas with poor public transport - Recovering from the Corona pandemic - we could see many shops not reopening. - There is a lack of street markets in many towns due to opposition from traders and the imposition of rules where a market stall isn't allowed to compete with an existing shop. This makes it more difficult for people to start up a business.
56	Rob Kennedy, Environment Agency	There are challenges around housing, climate change and car parking and car usage in the borough.
60	Kingsley Izundu, The Royal Borough of Kingston upon Thames	The key challenges which the London Borough of Richmond Upon Thames faces now and in the future are well articulated and clearly set out on pages 8, 9, 10, 11, and 12 of the consultation document.
62	Kathleen Massey	Protecting the special heritage of Richmond is key whilst there appears to be pressure on the council to build additional homes. It is important that areas of historic interest are not spoilt by inappropriate building eg around the historic houses and buildings of Petersham and Ham Common which need to be protected and

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		<p>preserved.</p> <p>Ham is restricted by being based around a single busy road between Richmond and Kingston. Traffic issues need to be carefully considered to avoid gridlock in rush hour and delays for buses when Richmond park is closed. The rapid increase in commuter parking in recent years has added to the problem causing further traffic issues around Ham Common and in residential roads with increased weaving in and out of parked vehicles causing risks for pedestrians and problems for delivery vans, lorries and larger vehicles.</p>
63	Carol Rawlings	Traffic problems throughout the borough and especially between Kingston and Richmond. Driving through the park is bad for wildlife; along the Richmond Road through Petersham is impossible when the park is closed and produces high levels of pollution. Unless private vehicles are restricted (e.g. to local residents) or banned, it is difficult to see how to improve this. Perhaps encourage bus travel with free passes for residents?
64	Johanna Eschbach on behalf of Richmond Bridge Residents Association	<p>We support the vision for the borough, in particular maintaining it as somewhere people can live and work, not just a wealthy dormitory. We acknowledge the need to accommodate the necessary growth in housing and employment infrastructure.</p> <p>While a borough-wide plan is important, the diversity of the borough must be recognised.</p> <p>Local communities put significant effort into responding to the previous administration's development of Village Plans. Rather than being ignored, the concept of hyper-local plans -and specific Village Plans where they remain useful - should be used and built upon, either in their current form or re-badged if needed to achieve political acceptability.</p>
66	Robert Philip Cunliffe	COVID-19 This poses immediate and clear challenges to the current Population Forecasting, most especially the age range forecasting. At best they are out of date, at worst they are wildly inaccurate. There needs to be a plan in place to assess and propose an alternative structure of the graphs. This is important as it underpins many of the assumptions driving the decisions and the expenditure. It may even suggest that a "pause" and a rethink / replan in a years time may be far more useful, far more targetted correctly, and far more likely to be affordable.
67	William Mortimer	<p>Top of my list is to preserve the character of the historic areas in the Borough. The one-size-fits-all approach from the Mayor of London in terms of housing density and proportion of 'Affordable Housing' to date is disgraceful. A few Councillors are reported to have visited the Mortlake area on a Saturday morning to assess traffic conditions pertaining to the Brewery site for themselves. How wrong they were to assume this time is typical of traffic flows in the working week. A study funded by Love Mortlake was not even taken into account at the public hearing. Councillors need to remember that their purpose is to serve the public and to give due importance to the alternative plan for the Brewery site submitted by Love Mortlake. It shows the Council's estimation of demand for a secondary school for 1200 pupils is inaccurate.</p> <p>I think it fair to conclude that the high-handed expectations of the London Mayor and the Council's determination to go ahead with Developer's plans for Mortlake Brewery, ignoring both actual traffic load and genuine senior schooling requirements, to be a travesty of justice for local people. Based on the judgement exhibited on this very important planning activity how can the ordinary citizen have confidence in the quality of the Local Plan?</p>
68 (a)	Mark Jopling	I support that climate change, biodiversity and green space features so strongly. There must be a really strong Plan that makes investing on urban green space not just "highly speculative" (ie) unlikely to succeed but worth the risk, rather the Council should take a firm stance on using all devices possible to divert developers to where the Plan supports development.
68 (b)	Mark Jopling	Protect all green space and encourage appropriate development on brown-field and change of use
69	Geoff Bond on behalf of Ham and Petersham Association	How do we make sure key elements of the borough that make it special are not lost for ever. Key here are two things; the small pockets of green space that provide key parts of green corridors and local sites of nature importance, secondly, the conservation areas and their unique characters need to be carefully protected. Lose either of the these two things and the area will change for the worse for ever.
70	Melissa Compton-Edwards	<p>Climate Emergency (including flooding risks, heatwaves and water shortages);</p> <p>Population growth, leading to pressure to build on greenbelt land to meet housing targets, increased traffic congestion and resulting greenhouse gas emissions and air pollution;</p> <p>Collapse of high-street outlets due to economic crises, cost of living purse-tightening by households, and online shopping trend;</p> <p>Possibility of reoccurring and new pandemics;</p> <p>Cost of supporting an ageing population and staff shortages in social care provision etc;</p> <p>Council budgetary constraints;</p>

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		Challenge of persuading residents to make the behaviour changes that will be necessary to tackle the Climate Emergency and air pollution public health crisis. As the Richmond Cycling Campaign notes: "The key challenge that is faced in anything to do with transport is the utter dependence that many people feel they have on their cars. Our challenge will be creating a culture of walking and cycling for normal trips in the face of determined opposition that does not recognise the unfair dependence on car culture and how it dominates our entire streetscape."
How might our role in London change in the future?		
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	Over the past twenty years we have moved from being very suburban area to one that is becoming more urban and this change is likely to continue. We used to be on the fringe of London, but effectively the boundary of what is functionally 'London' has moved to the M25 (if not beyond). This means that we have a dense urban belt, who's inhabitants have to travel through our borough if they work in central London.
31	Tim Catchpole on behalf of MESS	Hopefully it might not change.
38	Justine Langford on behalf of Ham and Petersham Neighbourhood Forum	By leading to address the challenges above with visionary, evidence based policies and implementation. Combining effective leadership with a non-confrontational, evidence led consultation process, to agree ways to achieve the necessary changes. The process fully represents residents including the quiet voices and hard to reach groups such as children.
39	Solomon Green	Hopefully not at all since the borough is one of the great lungs of the capital and a huge magnet for visitors.
40	Jamie Edwards	Stop worrying about virtue signalling projects (which seems to be a Group think phenomenon across Boroughs).... and focus on the basics.
41	Anthony Swan	Our role has been described as a green lung of London. In the future continue and improve on this. Encourage NPL and start up businesses. Encourage the schools especially at A level. Encourage St Marys ie Surrey Uni.
42	Jeremy Gill	We don't seem terribly relevant to the rest of London - because we aren't.
44	Roger Cutler	Likely to become less & less important.
54	Sally Beeson	I think you will have mounting pressure to build cheaper, smaller flats/houses and our precious green spaces may come under huge pressure to be built upon.
48	Roger Wilson on behalf of Roger Wilson Consulting LLP	Be a role model for other Boroughs and the GLA
49	Margaret Edwards	Not clear to me but perhaps action across London on key infrastructure, for example coordinated approach to repair of Hammersmith Bridge, challenging rail operators who provide substandard services, cross London plans to reduce homelessness and rough sleeping in combination with services related to drugs/alcohol.
50	John O'Brien	In danger of becoming a no go area for young families and poorer people.
51	Su Bonfanti	As working from/at home becomes more realistic for more people, Richmond could become a place where even more SMEs flourish.
52	Winston W Taylor	The current Mayor's abortive reelection campaign stressed Housing and rent control as his main issues. The Mayor does not yet have the power to impose rent controls but the Council will need to plan for it in case the Government give him the power. We may need to adjust Housing targets - if Mayor Khan is reelected. Otherwise, react to new Mayor's priorities.
53	Richard Woolf on behalf of McDaniel Woolf Architects	Richmond has the historic role as mediator between inner and greater London. It is fortunate, through historic legacy, in possessing some of the greatest open spaces and Arcadian Landscapes in the Capital. This role will change, more accessibility and management of these spaces is crucial.
55	Jon Rowles	- We will be less on the fringe of London due to a large amount of housebuilding taking place in the home counties just outside the formal administrative boundary of London - There is a danger we will become a dormitory town due to the accelerating loss of office space
60	Kingsley Izundu, The Royal Borough of Kingston upon Thames	Given the Council's declaration of a climate emergency and its commitment to taking robust action to tackle the local and global threat of climate change, the role of the borough in the future in London would change in both the approaches and actions it takes to minimise the borough's environmental impact, in terms of cutting carbon emissions, waste and pollution. This would necessitate adoption of a new strategic vision for the future of the borough as well as a new place making strategy

Respondent reference no.	Name / Organisation	Detailed comments
		for how to achieve this. The Council would have to set out clear and stringent environmental planning policy in its Local Plan which new developments will be required to meet.
62	Kathleen Massey	Richmond is a centre for 'open air' tourism, with Richmond Park and the popular areas of Richmond riverside. The open areas must continue to be well maintained to remain attractive to visitors. Public transport links need to be frequent and reliable. We are seeing a decline of the retail businesses in Richmond to our detriment. New retail outlets in Richmond's centre need to be encouraged to ensure its popularity as a shopping centre continues.
63	Carol Rawlings	Without major changes, Richmond will continue to attract the wealthiest people and make housing for middle and lower income bracket workers even more difficult. We should expand social housing to address this and we could implement new low emissions and private vehicle restrictions which would lower our carbon footprint.
67	William Mortimer	Our area is blessed with green space and provides a lung for the city as well as recreational activity. The presence of trees is calming and so they are also a resource to ease the fears of older residence as they feel more and more overtaken by the march of technology. Preserving our recreational areas is vital. I have yet to see any information about the plan to recover from disaster scenarios and both the experience of flooding in the Midlands this winter and the reliance on local people to respond to needs of the elderly and infirm resulting from Covid-19 lock down needs to be formalized - and extended as necessary - for future catastrophic situations where the standard provisions of all public services (not just the NHS) are overwhelmed.
68 (a)	Mark Jopling	How can Richmond, home of Sir David Attenborough, become a world leader in ecological standards, biodiversity protection and innovation?
68 (b)	Mark Jopling	Richmond should lead the new economy - ecology and ecology-technology hub for London
69	Geoff Bond on behalf of Ham and Petersham Association	We need to perform a key role as a green area with a lower level of emissions and more green space.
70	Melissa Compton-Edwards	Depends very much on the Government's approach in terms of how future national legislation affects the responsibilities of London Councils and also which Mayor is elected in 2021. I'd like to see a more joined-up approach to planning across London's Councils. We desperately need safe protected, connected pedestrian and cycle routes throughout London, Clean Air Zones which include @TfL-controlled roads and London-wide mandatory car-free/car-lite new developments, regardless of PTAL rating. If a site is too polluted to be safe for a new development and/or the PTAL rating is too low, then air pollution reduction and/or improved sustainable transport provision should be required before the development is permitted to go ahead. The guiding principle the Council should apply to all developments, whether retail, a visitor attraction, a school or a new housing development, should be "is this easily reachable without a car?". As Secretary of State for Transport, Grant Shapps, has acknowledged in the foreword to the DfT's Decarbonising Transport consultation on developing a plan for a net zero transport system, "public transport and active travel will be the natural first choice for our daily activities" and that "we will use our cars less and be able to rely on a convenient, cost-effective and coherent public transport network". We also need to be able to travel safely and easily by walking and cycling and planning policy must enable this.
What do you think should be our priorities in the new vision?		
19	DP9 Ltd on behalf of London Square Developments	How do we develop a new vision for the new Local Plan? – p. 12 We support the focus of development on brownfield sites as well as consideration of additional means to accommodate growth beyond existing approaches. It is our consideration that the existing approach to protection of employment land will not allow Richmond to meet its increasing housing delivery targets. Brownfield employment land that is unviable for continued use, including the subject Site, should be considered for this purpose.
20	Gary Backler, Friends of the River Crane Environment.	This response to the London Borough of Richmond upon Thames Local Plan Direction of Travel consultation has been prepared by Friends of the River Crane Environment. FORCE is a registered charity, set up in 2003 and with over 600 members, most of whom reside in LBRuT. More information on FORCE can be found at www.force.org.uk The Objects of the Charity are to protect and enhance the corridors of the River Crane and Duke of Northumberland's River for the benefit of wildlife and local people. This response is prepared in relation to these Objects. FORCE will continue to engage with LB Richmond in the development of this important policy document and we anticipate that our views and opinions will evolve as we see more details and discuss these with the appropriate officers.

Respondent reference no.	Name / Organisation	Detailed comments
		Overall, FORCE is concerned that, even though one of the principal drivers for this consultation is the fact that LBRuT has adopted a Climate Emergency Strategy, the emphasis of the Direction of Travel is very much on construction and development in the borough. The document repeatedly emphasises the “needs to accommodate future growth” and “there is not an option to do nothing” (p9, p12). The Plan puts much less emphasis on the need to improve investment, management and operation of the borough’s green assets, and on investment in pedestrian/cycleways to divert and reduce road traffic to mitigate the climate emergency. This is despite the explicit recognition that the borough provides “a green lung for southwest London” (p9). This fundamental imbalance in emphasis needs to be redressed in the new Local Plan.
22	Jimmy Wallace, Richmond Athletic Association	<p>The vision will also be based on an objective to reduce the need to travel and improve the choices for more sustainable travel whilst also including the objective to deliver the new homes the borough needs. We think the vision should firmly outline that the most appropriate locations for new homes are both within and adjoining the existing main town centres such as Richmond and this will ensure that the best use can be made of sustainable forms of transport for new homes. The vision and spatial strategy should be clear that new housing should be targeted towards existing brownfield and underutilised sites that are either within or in close proximity to the designated town centres and public transport. This should include land either within or adjacent to existing built up residential areas where infrastructure such as good road access already exists.</p> <p>It should also be made clear that this could include opportunities to provide for infill residential development where opportunities arise close to existing residential concentrations where essential infrastructure such as good access may already exist. In particular, we suggest that Richmond town centre and its surrounding residential hinterland is an appropriate location for further infill development and limited intensification / extension of existing established residential areas.</p> <p>Whilst the broad spatial strategy of protecting green and open spaces from inappropriate development is recognised, and as we will elaborate upon further later in this letter, we believe there are opportunities at certain locations for land currently designated as green and open land to be better utilised to meet the borough’s specific growth needs and that this can be achieved without causing any harm or detrimental impact upon the availability of meaningful green and open spaces.</p>
23	Paul Velluet & Peter Willan on behalf of Old Deer Park Working Group	<p>1.9 The Group would very much appreciate detailed clarification of the specifically planning grounds for the Council’s decision to prepare a new <i>Vision</i> and an entirely new <i>Local Plan</i>. Given the simplistic statement that ‘the new vision and new <i>Local Plan</i> will be written positively, and it (sic) will be about what you want to see rather than what you don’t’ (<i>Local Plan Direction of Travel Consultation</i>, page 12), the Group fears that such an approach might well lead to the unintended consequence of unravelling many existing and entirely sound planning policies and designations which have taken years to evolve. This risk is explicitly reflected in two of the questions posed on page 13 of the consultation document and at Questions 12 and 15 in the questionnaire:</p> <p>‘Should we continue to protect our green and open spaces from inappropriate development, or are there parts of the Borough that could assist in accommodating growth?’ And</p> <p>‘Are there parts of the Borough that could be transformed through larger scale development and encouraging intensification (for example redevelopment of existing single dwellings to blocks of flats)?’</p> <p>1.10 The posing of such questions, clearly suggests that the present Administration is open to being persuaded to set aside well tried and tested protective policies in favour of purely short-term economic and other objectives.</p>
24	Paul Velluet	<p>I would very much appreciate detailed clarification of the specifically planning grounds for the Council’s decision to prepare a new <i>Vision</i> and <i>Local Plan</i>. Given the simplistic statement that ‘the new vision and new <i>Local Plan</i> will be written positively, and it (sic) will be about what you want to see rather than what you don’t’ (<i>Local Plan Direction of Travel Consultation</i>, page 12), I fear that such an approach might well lead to the unintended consequence of unravelling many existing and entirely sound planning policies and designations which have taken years to evolve. This risk is explicitly reflected in two of the questions posed on page 13 of the consultation document and at Questions 12 and 15 in the questionnaire.</p> <p>‘Should we continue to protect our green and open spaces from inappropriate development, or are there parts of the Borough that could assist in accommodating growth?’ And</p> <p>‘Are there parts of the Borough that could be transformed through larger scale development and encouraging intensification (for example redevelopment of existing single dwellings to blocks of flats)?’</p>
25	Phoebe Quayle	See comments on the vision as below.

Respondent reference no.	Name / Organisation	Detailed comments
29	Richmond Cycling Campaign	We believe the council should focus on sustainability, and the embedding of its new transport hierarchy in all its work. As part of London, the borough should also focus on how delivering sustainable transport options requires partnership with other authorities. (The recent Liveable Neighbourhoods bid with Kingston is a good example of this.)
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	The Government wants LPAs to address; housing needs, economic, social and environmental priorities.” We feel you should follow this framework.
31	Tim Catchpole on behalf of MESS	Action v climate change and the provision of more affordable housing.
32	Mark Jopling on behalf of UPPFT	Overall the Trust welcomes the "Direction of Travel" consultation document, which gives such high priority to climate change and green infrastructure. Richmond, as a green and affluent Borough, has responsibility to be one of the leading Boroughs for the new sustainable economy, accelerated by the aftermath of CV-19, that will emerge in this new decade. As the home of Sir David Attenborough, the most influential ecologist of this Century, Richmond should be a global leader in building a sustainable community that protects biodiversity and green space. Richmond can lead London, the worlds first National Park City. Be bold.
38	Justine Langford on behalf of Ham and Petersham Neighbourhood Forum	<ul style="list-style-type: none"> • Meeting climate change targets, and decarbonising streets (transport is the highest source of carbon emissions at 27%³). • Creating successful, attractive and vibrant, people and family friendly town centres and neighbourhood centres and cohesive, inclusive self-sustainable communities (20 minute neighbourhoods ⁴ & ⁵) • Implementing 'Good Growth by Design'⁶ development and protecting heritage and green spaces. • Implementing changes through policy, design, education, procurement and enforcement to achieve Vision Zero to make the borough attractive and safe for sustainable and active travelling. <p>References: ³ London Borough of Richmond upon Thames Climate Change and Sustainability Strategy (2019) Available at: https://www.richmond.gov.uk/media/17648/climate_change_and_sustainability_strategy_2019_2024.pdf (Accessed: 29 March 2020). ⁴ Victoria State Government (2020) 20-minute neighbourhoods. Available at: https://www.planning.vic.gov.au/policy-and-strategy/planning-for-melbourne/plan-melbourne/20-minute-neighbourhoods (Accessed: 29 March 2020) ⁵ Sustrans (2019) Sustrans Manifesto for UK Government. Available at: https://www.sustrans.org.uk/media/5211/sustransmanifestoukgovernment.pdf (Accessed 29 March 2020). ⁶ The Mayor of London (2019) <i>London Plan</i> Available at: https://www.london.gov.uk/what-we-do/regeneration/advice-and-guidance/about-good-growth-design (Accessed 29 March 2020).</p>
39	Solomon Green	Protecting Heritage and open land. Current population should ensure that Culture will remain and develop without the need for any Council interference, except for the protection offered by strict planning regulations. Delivering more affordable homes. Helping business to grow.
40	Jamie Edwards	Basic infrastructure. Quality of Roads. Street cleaning. Quality of open spaces for families. More doctors appointments. More dental appointments. More Police on our streets.
41	Anthony Swan	Environment, especially Economy, Schools, Transport, Policing, Older people, Hospitals. There comes a time with housing where you have to say we are full up. Don't just rely on charities to give every rough sleeper a choice to sleep under cover.
42	Jeremy Gill	Stop wasting time and energy on attention seeking grandiose visions and instead concentrate on what we pay you for, which is to look after our communities in meaningful ways, like protecting our people from anti-social behavior.
44	Roger Cutler	More parking. Using the previous administration's plan for Twickenham Embankment rather than waste more money. Provide more medical & social care as a priority with the money saved. House rough sleepers. Eradicate drug use in the schools.

Respondent reference no.	Name / Organisation	Detailed comments
54	Sally Beeson	Trying to keep our borough as safe, green and beautiful as it can be without sacrificing it to greedy property developers who put nothing back into our local communities.
46 (a)	Joan Gibson	Biodiversity and reducing to a minus fig our emissions
47	Trevor Rowntree	Reduction of population to solve the housing crisis in this area.
48	Roger Wilson on behalf of Roger Wilson Consulting LLP	Promote walking, public transport and cycling. Stop use of cars and vehicles across the Borough.
49	Margaret Edwards	Sustainable development, increase in affordable housing, improving air quality (possibly controls on wood burners, incentives to move away from diesel powered vehicles), challenging extension of Heathrow and increase in flights, incentivising travel by foot, bike and public transport (especially for journeys to school and local commutes)
50	John O'Brien	Encourage greater citizen involvement using new technology to the full e.g. the app Fix My Street allows everybody to bring problems to the attention of the council including specific location and a picture if relevant. Council should have a policy of updating these issues and logging when they have been addressed/fixed.
51	Su Bonfanti	I very much support the need to accommodate the necessary growth in housing and employment infrastructure. I think many people don't realise how much employment there is in the borough or that the Local Plan needs to protect land for employment purposes. I don't think it's important to have individual policies/strategies for different parts of borough. This has been done once in recent years by a previous administration, to produce Village Plans. And frankly, for East Twickenham, I think the process took a lot of resource, including in the community, and has delivered next to nothing. But clearly I would want the emphasis to be different in different places depending on the current state of play.
52	Winston W Taylor	1. Climate change obviously 2. Housing 3. Air quality 4. Reducing parking
53	Richard Woolf on behalf of McDaniel Woolf Architects	A realistic expectation of residents need to develop an evolve their places of habitation and an acknowledgement that ' matching what exists ' as the only architectural response isn't the viable choice for the 21st Century .
54	Paul Luton	Action on climate change should inform all aspects.
55	Jon Rowles	Need to think about the ordering of priorities - as Climate Emergency becoming before housing is likely to cause conflict with the Government Inspector. - Need to identify green chains and wildlife corridors better - need to state clearly your objective is to improve people's quality of life (this is mentioned time and again in Government Documents of Sustainable Development).
58	Michael Atkins, Port of London Authority	The PLA considers that the vision for the new Local Plan must include reference to the boroughs various waterways, including the River Thames, and the role that these can play in combating climate change through increased use and enjoyment of these areas.
59	Paul Massey	Protection of OOLTI and heritage sites
60	Kingsley Izundu, The Royal Borough of Kingston upon Thames	Richmond's priorities in the new vision are clearly set out in the 10 themes listed on page 12 of the consultation document.
62	Kathleen Massey	Preservation of our historic locations and buildings. Richmond Park to be maintained to the highest standard. Traffic issues throughout the borough should be much better managed and road works properly coordinated to avoid the regular disruption they cause, especially on the single road through Ham that links Richmond to Kingston.
63	Carol Rawlings	1. More re-wilding to protect wild life throughout the borough and reduce pollution and our carbon footprint. We have a responsibility as a lung for London. 2. Reduce vehicle use to a minimum and encourage electric transport.
64	Johanna Eschbach on behalf of Richmond	The 10 objectives of the Council seem right but overly ambitious (can we really deliver all of this in a meaningful way?). We would like to know what top 3 objectives will be the focus and where the focus of the investment will be. Some of these objectives – although very noble – seem a bit out of reach: “an affordable borough for

Respondent reference no.	Name / Organisation	Detailed comments
	Bridge Residents Association	all", "reducing the need to travel" or very unspecific "respond to climate emergency". By looking at a bit of everything, there's a doubt we can deliver anything in an ambitious way. Key priorities as per feedback from our members: 1. Tackle air pollution 2. Address traffic congestion and lack of parking for residents 3. Reinvigorate high streets and protect the Conservation areas
66	Robert Philip Cunliffe	Young people, Law and Order, sustainable jobs
67	William Mortimer	Preparing for a society which is more and more influenced by the rise of the Internet and robotic solutions in manufacturing, service industries and also charitable bodies providing local care solutions. Ways are needed to keep the whole spectrum of local people physically and mentally stimulated as well as safe from scammers. A well-balanced society relies on maintaining physical and mental health as well as benefiting from the undoubted positives of a linked up technological world. Our economic recovery will depend on a capability to continue to deliver the local government services and to prime independent businesses to get the economy going again when the virus has been defeated. To give a critical example today, banks must be required to provide vestigial cash services for disabled or elderly people without any educational or vocational experience of digital banking. It is vital to the well-being of elderly and infirm citizens that they be able to continue life in a cash economy. Government centrally and locally has not been supportive of efforts made by local people to require the banks to maintain a service. As a result the predicted isolation of a whole raft of our society is to be seen. The current provisions for people put out of work by the Covid-19 virus is huge and we must anticipate a period of time in which the government will be obliged to reduce National Debt.
68 (a)	Mark Jopling	Climate change, biodiversity, green space. There is no Planet B.
68 (b)	Mark Jopling	World-leading green sustainable society, if not here where else ?
69	Geoff Bond on behalf of Ham and Petersham Association	Protecting green spaces and the character of conservation areas
70	Melissa Compton-Edwards	- Ensuring that Green Belt and MOL sites are NOT allocated for development. - Ensuring that all development is low-carbon and car-free/car-lite and that PTAL rating is NOT used as an excuse to permit developments with private car-parking. - Developing a rating(s) system that takes account of active travel provision as well as public transport provision. -Ensuring that development is NOT permitted in areas with illegal levels of air pollution. - Maintaining and enhancing the character of the borough (which includes not approving ugly 'bog-standard' 'could be anywhere' brick lump designs like I very much fear the design for the secondary school will be on the Mortlake Brewery site). I share the Richmond Cycling Campaign's view that LBRUT's new vision should focus on sustainability, and the embedding of its new transport hierarchy in all its work. As part of London, the borough should also focus on how delivering sustainable transport options requires partnership with other authorities.
Have we covered all the key issues and overarching challenges facing the borough in the ten themes above or is there anything missing?		
Of respondents who answered the question: 14 said yes, 14 said no and 4 said don't know [6 did not answer the question]		
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	We do not feel there has been enough co-operation with Kingston Upon Thames and Hounslow Councils – as they need to meet some of our unmet housing requirements – and we note they both have 'opportunity areas' next to our borough. The NPPF 35a States local plans have to be... "Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development." We feel the council need to set out what, if any, unmet needs neighbouring councils have agreed to meet. There are benefits of extra density, such as better shops, more night life, cultural institutions and better opportunities for businesses. Need to provide jobs for a percentage of the new residents – otherwise there will be extra strain on public transport and roads.

Respondent reference no.	Name / Organisation	Detailed comments
31	Tim Catchpole on behalf of MESS	Nothing missing.
38	Justine Langford on behalf of Ham and Petersham Neighbourhood Forum	As above.
39	Solomon Green	Before this Borough gets too excited by the wildly exaggerated "climate crisis", a thorough scientific investigation should be undertaken as to whether this borough is a net producer of CO2. If it is then priority should be given to planting even more street trees. and nursing them for the first few years. Too many die in the first five years after planting because they are not properly maintained.
40	Jamie Edwards	You should introduce a quality of life / happiness measure for the borough so we can see the impact of your efforts on people's overall feeling of well being. You're also focusing on doing too many things. Having 10 areas of focus will dilute resources, brain power and funding. Pick 3 that will really transform residents lives, and focus on those 3 relentlessly.
41	Anthony Swan	Don't know if anything missed without knowing the detail
42	Jeremy Gill	Willingness to change your minds about anything. For instance, your policies about vehicle use and pollution ignore the massive energy cost of scrapping old vehicles before they are worn out and manufacturing new ones. The damage has already been done - they were built. The least damaging thing to do with old vehicles is to use them until they fall apart. This energy cost is borne by the whole world, not just Richmond.
44	Roger Cutler	Everything I mention in question 8.
46 (a)	Joan Gibson	Council needs to build social housing. All contracts and changes need to work cross borders (unlike the current bike hire contracts).
47	Trevor Rowntree	Over population
49	Margaret Edwards	Given housing shortage and rising ageing population the needs for specialist housing for older people and every home to be a lifetime home in new housing developments seem to have been omitted.
50	John O'Brien	I've done that above. I also note that no children approaching secondary school age in North Kew have automatic access to any of the Secondary schools in the borough - surely Christ's is the obvious one.
52	Winston W Taylor	None - at the moment.
53	Richard Woolf on behalf of McDaniel Woolf Architects	New bridge crossing opportunities. Please refer to your WSP Report of October 2018. <i>[A copy of the WSP Report was provided, which is available at https://www.richmond.gov.uk/media/16409/thames_bridge_feasibility_summary.pdf]</i>
55	Jon Rowles	- The housing market for people needing Housing Benefit isn't based upon the Borough boundary but the Broad Market Rent Areas (BMRA) and this needs to be explained in the Local Plan with the boundaries shown. The Government expects people to be mobile and find housing within the BMRA - but this document seems to be taking a different approach. If you take into account BMRA much of the 'shortage' disappears. Need to deal more explicitly with an ageing population
58	Michael Atkins, Port of London Authority	From the ten themes that have been identified that will inform the new vision for growth in the borough the PLA consider that the them on increasing biodiversity must refer to green and blue spaces rather than just green, to recognise the importance of blue spaces in the borough including the River Thames, particularly as the London Borough of Richmond Upon Thames is the only borough that spans across both sides of the Thames and serves as a key asset for the borough.
60	Kingsley Izundu, The Royal Borough of Kingston upon Thames	Nothing is missing.
63	Carol Rawlings	These questions should come after the local plan. I can't find a link to the plan so can't actually read it.
64	Johanna Eschbach on behalf of Richmond	What is missing: - Increasing the wellbeing of residents through addressing significant disruptions (noise pollution, traffic, air traffic, etc.). To define this further, the Council should

Respondent reference no.	Name / Organisation	Detailed comments
	Bridge Residents Association	refer to specific guidance and guidelines from the WHO. This is critical for physical and mental health of residents - Tackling an increasing level of crime
66	Robert Philip Cunliffe	already included in my responses above
67	William Mortimer	Until the Local Plan provides cross-referencing to the Disaster Management Plan the effort is incomplete. The flooding experience in the Midlands this winter could equally well happen here and hence the Local Plan must fit with the Environmental Agency Plan, the provisions of the Lifeboat Service, the Port of London Authority, police and military.
68 (a)	Mark Jopling	Real focus on making our Village High Streets thrive . Support independent traders, there will be a change in consumer behaviour over the life of this local plan, many people, especially in affluent Boroughs will switch to smaller more ethically sourced products and produce. Big box retail is in decline, Smaller supermarkets will survive, the 2 new Lidl's fill a gap in the local market.
68 (b)	Mark Jopling	Is the space re-allocation radical enough ?
69	Geoff Bond on behalf of Ham and Petersham Association	The importance of preserving conservation areas, OOLTIs and OSNIs
(11) In addition to our existing approaches of directing larger scale development to the borough's town centres, and expecting the majority of development on brownfield sites, where should we direct new growth in the borough?		
14	Mayor of London	See also comments in Section "Increasing jobs and helping business to grow" relating to the location of office development.
29	Richmond Cycling Campaign	We can't comment directly on site choice, but we would stress that all new developments ought to be car free. If PTAL is too low for it to be considered car-free, then the solution for this is to improve PTAL, and not to simply dedicate expensive public space to car parking and driving. The suggestion has been made of an Active Travel Availability Level a good value of which would compensate for a lower PTAL. The Stag Brewery development is an excellent example of this - there's enough road space in the area for a development of this size only if we provide for and prioritise active travel and public transport.
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	To areas close to the new Crossrail 2 scheme are suitable for flat building if they are within walking distance of the new stations The National Infrastructure Commission in their report Transport for a world city state on page 13 "Crossrail 2 will need to have buy-in from the GLA and London boroughs along the route as well as counties and boroughs outside of London which benefit from the new line. All parties will need to ensure the housing unlocked by Crossrail 2 is sustainable and meets the needs of Londoners and those in commuter regions around London." With four new Crossrail stations; how many housing units do their business case pencil in for LBRUT? [See Appendix for map]
31	Tim Catchpole on behalf of MESS	Near railway stations and atop car parks, notably at retail parks, or indeed in place of retail parks
38	Justine Langford on behalf of Ham and Petersham Neighbourhood Forum	Major development should be in locations that with high PTAL and enabled to reduce car dependency.
39	Solomon Green	Nowhere, because to do so would alter the whole character of the Borough. The problem should only be addressed when the existing brownfield sites have been exhausted. This should take at least fifteen years.
40	Jamie Edwards	You should focus on supporting existing business. And quality of existing residents lives. Not bringing in new retail / floor space, or bringing in more people.
41	Anthony Swan	If by growth you mean building then there are lots of places where NOT to build. Personally I don't know anywhere that would be a likely building target. The likely target of Teddington studios has not worked well has it... Just as major investments are being made at Pinewood etc.
42	Jeremy Gill	Since we have left Europe the economic, social and demographic conditions upon which any current plan can be predicated are liable to changes impossible to predict at this time. You're not very good at directing development, so don't. Instead of having a policy and slavishly following it, try making decisions on a case by case basis. You overstate the influence that policy has on development, which happens more by accident than you would be comfortable admitting. I recommend the council not try to direct development by having a policy. It will be rendered obsolete by events before you've even decided what it is.

Respondent reference no.	Name / Organisation	Detailed comments
44	Roger Cutler	More car parks for shoppers & pub & restaurant users. More & larger scale developments need more parking with more electric charging points for a greener car future. More places for young adults to spend time. Might stop all the anti-social behaviour. More sports facilities.
54	Sally Beeson	I agree that brownfield sites could be built upon as well as town centres. After that i totally reject the idea that more building would enhance any of our lives for the better.
46 (a)	Joan Gibson	You should have 100% of development on brown field sites. There is no excuse for building on green sites and making the climate emergency worse.
47	Trevor Rowntree	Development should be concentrated on facilities for the residents rather than any more housing developments.
49	Margaret Edwards	Several opportunities to develop housing on brownfield sites have been lost (Wickes site, site where new school and Lidl being built in East Twickenham), already plus development of standard family housing or flats on brownfield sites that could have met the needs of ageing population (Brewery Lane, and over Twickenham station, Richmond police station). Developments outside town centres only work if transport links are good.
50	John O'Brien	Ham
52	Winston W Taylor	We have if I remember correctly about 6 years of building land. Lets see what the suggestions are to the request for land for building.
53	Richard Woolf on behalf of McDaniel Woolf Architects	Reordering of our redundant retail spaces.
55	Jon Rowles	Many of the supermarkets and out of town shops are hugely space inefficient with large amounts of surface parking and only one or two stories. Need to include brief for sites such as the large Sainsbury's in Hampton St Clares, Homebase in Hanworth, surface car parks at Twickenham Stadium, Kew Retail Park etc.
60	Kingsley Izundu, The Royal Borough of Kingston upon Thames	New growth could be directed to underused sites with redevelopment potential or where opportunities for housing densification or intensification and or mixed use incorporating housing is possible (e.g. car parks sites), particularly within town and local centres or edges of these sites.
63	Carol Rawlings	I can't find the plan so can't comment.
66	Robert Philip Cunliffe	I would urge extreme caution on any "growth" plans - at best as a minimum defer by 5 years
67	William Mortimer	It is not possible for me to advise you where the 'brownfield' sites in the Borough are located but I do support the intention of the Council to safeguard the urban green spaces. IT is vitally important that the Borough plays its part in the efforts to clean up the environment by 2050 at the latest. We need to see how fuels like hydrogen are to be delivered so that the only waste product of a motor engine or a home heating boiler will be satisfied and the sooner the better.
68 (a)	Mark Jopling	"Majority" is not enough, it encourages the speculator to "take on" the Council. The speculator can afford the most expensive advisors and barristers to drain Council resources and smash the Local Plan. All development should be focused on existing areas that are not Green. There are many locations that could be sensitively developed, using Twickenham Station scheme and the Lidl/School as a benchmark The car parks around Twickenham stadium are used a few times a year. They could have significant developments over them, with parking retained. (Wembley Stadium has created a whole community around it as a benchmark) Sainsbury at North Sheen, Sainsbury St Clares, Hampton and Tesco Twickenham could be rebuilt as multi-storey developments with food retail on the ground floor. CV-19 will further switch food distribution to on-line, these "superstores" will continue to decline. The Twickenham Station scheme could be a benchmark, develop the space above Richmond station including the multi-storey car park, would be major source of new housing located by transport hub
68 (b)	Mark Jopling	Redevelop Richmond Station using the template from Twickenham Station, including the multi-storey car park. Big-box retail is dying and massively space inefficient. Remodel the large supermarkets and DIY sheds into multi-purpose developments: 1) Tesco Twickenham 2) Build over the vast RFU car parks - see Wembley Stadium surroundings for what is possible 3) Sainsbury and Homebase North Sheen 4) Sainsbury Hampton St Clares

Respondent reference no.	Name / Organisation	Detailed comments
69	Geoff Bond on behalf of Ham and Petersham Association	These these two focus areas are all you need.
70	Melissa Compton-Edwards	As suggested by CPRE London, surface and multi-storey car parks could be redeveloped to make more efficient use of space and discourage car trips. All new developments ought to be car-free or car-lite. If the PTAL is too low for the development to be considered car-free, then the solution for this is to improve PTAL, and not to simply dedicate expensive public space to car parking and driving. Small-zone CPZs should also be introduced borough-wide to discourage commuter parking and unnecessary short trips within borough by car and prevent displacement parking by residents in new car-free/car-lite developments. The suggestion has been made of an Active Travel Availability Level, a good value of which would compensate for a lower PTAL. Mortlake's Stag Brewery is an example of a development which should be a car-free development, or car-lite (where the only provision is for disabled parking, deliveries and car club parking). Since most housing in Richmond has car parking available, there is no need for new housing to cater for private car-parking. Many residents cannot or do not want to live with a car, particularly older and young people, and those on low incomes. New housing should cater for these people and, in doing so, also reduce car trips in the borough. New developments can have car club parking only and sustainable transport hubs with cycle parking, delivery hubs etc.
<p>(12) Should we continue to protect our green and open spaces from inappropriate development, or are there parts of the borough that could assist in accommodating growth? - If you think there are there parts of the borough that could assist in accommodating growth, please tell us more.</p> <p>Of respondents who answered the question: 29 considered that we should continue to protect our green and open spaces from inappropriate development 3 considered that there are there parts of the borough that could assist in accommodating growth [6 did not answer the question]</p>		
18	Phoebe Juggins, Department for Education	See also comments on the open space and playing fields.
28	Alice Shackleton on behalf of The Kew Society	This comment relates to the first option above [<i>Continue to protect our green and open spaces from inappropriate development</i>]: <ul style="list-style-type: none"> • An implication of the wording of this question is that our protected green and open spaces could become available to assist in accommodating growth? Why else, posit the question in this way? • Yes, we must continue to protect our green and open spaces from inappropriate development. • There may be other parts of the borough that could assist in accommodating growth – these must be identified
29	Richmond Cycling Campaign	As a general principle, we must protect these spaces. However, we'd also like to see our green spaces supporting active travel appropriately, and there are clear opportunities to improve walking and cycling routes around and through our green spaces.
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	The most obvious ones are the large out of town retail centres and large supermarkets. Fulwell Bus Station could also be redeveloped to produce and air-rights development above the bus depot. This could include some land set aside to increase the linkage between link Fulwell Golf Course and Strawberry Hill Golf Courses.
31	Tim Catchpole on behalf of MESS	We should certainly continue to protect our green and open spaces.
38	Justine Langford on behalf of Ham and Petersham Neighbourhood Forum	Green spaces should be protected as a valuable resource for residents and visitors.
40	Jamie Edwards	No. We don't need more people. Quality of life has been dropping in the borough over the last years. Cramming more people in won't help.
41	Anthony Swan	Udney Park
44	Roger Cutler	Twickenham Embankment. Restore the lost parking.

Respondent reference no.	Name / Organisation	Detailed comments
54	Sally Beeson	Telephone exchange on Teddington High Street Teddington Police Station
46 (a)	Joan Gibson	You appear to see inaccessible green land as inferior to green spaces with lots of visitors. So are justifying you can build on inaccessible green land. This is not true for wildlife and biodiversity - dark, undisturbed green land is much better in this instance and as this is all about climate emergency you should afford these sites the highest protection.
49	Margaret Edwards	If Ham/Petersham was better served by public transport there might be areas there where increases in density and use of small plots would be viable.
51	Su Bonfanti	I support keeping most green space protected even if some of it would not generally be regarded as high quality. Preventing unconstrained sprawl is as important as it ever was. However, I do think it is in principle possible to identify areas which are of relatively low quality and otherwise suitable for development, e.g. because they have good transport links, which could be released.
52	Winston W Taylor	My perception is that central Richmond, East Sheen, Mortlake, Kew and Barnes has not borne the brunt of housing development in recent years - and certainly not affordable housing. I am quite prepared to be shown that I am wrong about this but I think the policy should be to spread development including affordable housing evenly throughout the borough.
53	Richard Woolf on behalf of McDaniel Woolf Architects	We should have a 'grown up' conversation about Metropolitan Open Land within the borough and Conservation Area designation.
55	Jon Rowles	If areas are to be released they should be by the proposed new Crossrail 2 stations
67	William Mortimer	Please rephrase the second bullet point. It makes no sense. But in any case we must hang on to green space for the recreational use of our citizens or once again the mental health of the community will suffer. The Council should be putting funds in the direction of persuading old and young of every ethnic origin to use our green spaces more in an attempt to reduce future growing demand on public health services. As example, if the Council adhere's to its unsubstantiated claim that a senior school at Mortlake Brewery is necessary the community loses a sports field and the pupils have no obvious recourse to green field playing area for football, cricket, hockey and rounders.
68 (a)	Mark Jopling	This is 2020 - if we lose any more green space future generations will ask "what on Earth were you thinking of?" London is the World's first National Park City, it is essential to protect the green space we have left "Inappropriate" is too low a threshold, it encourages speculators to challenge the Council in Planning disputes, causing a huge drain of public resources. This should be "All". The CPO legislation is sufficient that if there is genuine important public need for building on green space it can still go ahead (eg infill building on hospital grounds).
68 (b)	Mark Jopling	Stronger disincentives for speculative attempts to smash the Local Plan by building on Green Space. Council must be very strong from the start of any attempts to build on protected space for excess profit margins that waste huge public resources fighting off speculators who can afford Londons most expensive consultants and Barristers.
70	Melissa Compton-Edwards	So, so important to protect our green and open spaces from inappropriate development in this time of Climate Emergency and mass extinction of wildlife. Once they are gone, we'll never get them back, and as the Covid-19 crisis is demonstrating, they are vital for our physical and mental health. I support Richmond Cycling Campaign's desire to see our green spaces supporting active travel appropriately, and there are clear opportunities to improve walking and cycling routes around and through our green spaces.
(13) Which areas of the borough do you think are capable of taking more growth than others, for example based on their proximity to town centres and stations? [Please note Questions 11 & 12 referred to by some respondents are those directly preceding this question.]		
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	It is not just a question of proximity to stations but also the frequency of services. When London Underground took over some National Rail Routes and created a metro style service, this prompted developers to build thousands of new flats along the route. This experience should also serve as a warning to the council – have you looked at the impact Cross Rail 2 will have on housebuilding and subsequent demand on public services such as school places and GP practices?
31	Tim Catchpole on behalf of MESS	As mentioned in answer to Q12 above, i.e. atop carpark at retail parks or indeed in place of retail parks. [Additional comment in response by email]: Retail parks (in addition to near town centres and stations)

Respondent reference no.	Name / Organisation	Detailed comments
38	Justine Langford on behalf of Ham and Petersham Neighbourhood Forum	As above.
39	Solomon Green	See answers to 11 and 12
40	Jamie Edwards	None.
41	Anthony Swan	No idea
42	Jeremy Gill	Our town centres need more attention paid to the effects on general well being and service provision during the current economic conditions, you could direct some energy into practical regeneration on specific areas in need and not borough-wide.
44	Roger Cutler	Richmond Station . Extend like Twickenham Station.
54	Sally Beeson	Yes, near to town centres and stations
46 (a)	Joan Gibson	All - see my list of possible sites
47	Trevor Rowntree	None
49	Margaret Edwards	In Richmond Town Centre I would predict that House of Fraser store will close - an ideal location for extra care housing for older people as all facilities close by and would boost demand in local shops, cafes etc. Could housing be built on top of Richmond station?
52	Winston W Taylor	See 12.
53	Richard Woolf on behalf of McDaniel Woolf Architects	Ham , Whitton and West Hampton
55	Jon Rowles	Most railway stations are already over capacity - so this will point to developments having to take place by the new Crossrail 2 Stations
60	Kingsley Izundu, The Royal Borough of Kingston upon Thames	See our response to question 11.
62	Kathleen Massey	Not central Richmond nor around Richmond Park. Not Ham and Petersham
63	Carol Rawlings	Twickenham
64	Johanna Eschbach on behalf of Richmond Bridge Residents Association	Not in East Twickenham
67	William Mortimer	My suggestion of a catamaran service on the Thames travelling right up to Richmond would have included landing points such as Barnes Bridge and Mortlake Brewery. This would provide an alternative to road traffic and then maybe the space required for cars to be parked could instead be allocated to innovative industries (e.g. the vegetable growing enterprise occupying unused portions of London underground tunnels in the Waterloo area.
68 (a)	Mark Jopling	See 11. Comprehensive redevelopment of large food supermarkets and DIY superstores. "Big Box" retail is becoming irrelevant and will almost disappear by 2030.
68 (b)	Mark Jopling	Per 11; Richmond Station and Big box retail.
Which areas of the borough may be suitable for more infill development and intensification?		
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	Town Centres could accommodate a lot of development as there are often large service yards and back areas that are poorly utilised. However, it is important that adequate servicing space is retained.
31	Tim Catchpole on behalf of MESS	Main road corridors?

Respondent reference no.	Name / Organisation	Detailed comments
38	Justine Langford on behalf of Ham and Petersham Neighbourhood Forum	As above
39	Solomon Green	See answers to 11 and 12
40	Jamie Edwards	None.
41	Anthony Swan	No idea
42	Jeremy Gill	None
44	Roger Cutler	Richmond.
54	Sally Beeson	Empty shops
46 (a)	Joan Gibson	All - see my list of possible sites
47	Trevor Rowntree	None
49	Margaret Edwards	See 12 above
50	John O'Brien	Mortlake riverside
51	Su Bonfanti	East Twickenham, where I live, is so constrained by roads, railways and the river that only infill and minor intensification is really possible. The Ryde House/Lidl/School site is by far the largest here and that's nearing completion. What I don't have a clear grip on is just how infill and intensification can be allowed without becoming a 'building on gardens' free for all.
52	Winston W Taylor	Await suggestions but 12 above is also relevant here.
53	Richard Woolf on behalf of McDaniel Woolf Architects	We should consider a plan approached response. With the exception of our ' key ' Conservation Areas.
55	Jon Rowles	There is still a lot of underutilised land in Twickenham and Richmond town centres - there may be a need for a full land-use opportunity survey to take place.
60	Kingsley Izundu, The Royal Borough of Kingston upon Thames	Small opportunity sites, underdeveloped/under-utilized, sites within 800 metres of train stations and town centres, subject to constraints.
63	Carol Rawlings	None. Climate change should be the primary consideration. We need all the green space we have in the borough.
64	Johanna Eschbach on behalf of Richmond Bridge Residents Association	Not in East Twickenham
67	William Mortimer	Not an easy request of people who know only the locations adjacent to their homes. I have supported change at the Barnes Hospital site and the proposals of the Love Mortlake group at Mortlake Brewery. The sad thing is that the impediment to these schemes would appear to be the Council. Why not identify sites that the Council has in mind and then consult on what could be reasonably be accommodated?
68 (a)	Mark Jopling	Development over Richmond Station similar though larger to the current scheme over Twickenham station. Massive area of dead space if extended to include the multi-storey car park.
68 (b)	Mark Jopling	Per 11
Are there parts of the borough that could be transformed through larger scale development and encouraging intensification (for example redevelopment of existing single dwellings to blocks of flats)?		
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	Parts of Twickenham and Richmond Town Centres. However, the block has often been fragmented ownership so the council may need to be more willing to use compulsory purchase powers.

Respondent reference no.	Name / Organisation	Detailed comments
28	Alice Shackleton on behalf of The Kew Society	This suggests that the Council would be open to development that would be inappropriate in the borough and more appropriate in an urban rather than suburban setting. Is this taking a short-term view? One that would potentially destroy special "green" characteristics of the borough and/or cause irreparable harm to its heritage assets for what may well be short-term aims. We would expect there to be very few if any areas of the borough now suitable for such development but would be open to considering suggestions.
31	Tim Catchpole on behalf of MESS	Main road corridors?
39	Solomon Green	See answers to 11 and 12
40	Jamie Edwards	NO! NO! NO! We don't need more people. You can't find parking in our own streets already. Getting school places is a nightmare already. We don't need more people.
41	Anthony Swan	No idea
42	Jeremy Gill	Only for the worse. Blocks of flats are a horrible way to live, believe me.
44	Roger Cutler	Richmond Station.
54	Sally Beeson	Maybe
46 (a)	Joan Gibson	Yes - all council owned buildings and car parks like Whitton Community centre and Old Deer carpark - see my list of possible sites.
47	Trevor Rowntree	No
49	Margaret Edwards	The challenge in this is the impact on the character of an area, where large blocks dwarf houses. The subdivision of large houses into flats is quite common in the borough and this increases density without an impact on appearance. An alternative form of intensification is the development of home sharing and intergenerational living where couple/single people provide accommodation in their homes to other, sometimes in exchange for support/company/transport.
50	John O'Brien	Build over railway stations
51	Su Bonfanti	The number of empty shops in Richmond Town Centre raise the question of whether we reaching the point at which a move towards mixed housing/retail, more like an 18th century high street, is plausible.
52	Winston W Taylor	Almost certainly. The question is whether it is desirable. My view is that every case depends on its merits.
53	Richard Woolf on behalf of McDaniel Woolf Architects	Ham . Ham Close. Whitton and West Hampton... specifically.
55	Jon Rowles	Most redevelopment would need to involve more than one dwelling being redeveloped to create an acceptable outcome. The majority of the single dwellings sitting on a large plot of land have a lot of heritage value.
60	Kingsley Izundu, The Royal Borough of Kingston upon Thames	Parts of the borough that could be transformed are Council Housing Estates sites as they offer scope for larger scale regeneration/ redevelopment involving housing intensification.
63	Carol Rawlings	The covid 19 pandemic should teach us that intensification is to be shunned. Civilisation is fragile.
64	Johanna Eschbach on behalf of Richmond Bridge Residents Association	Not in East Twickenham
67	William Mortimer	Be careful when you speak of 'blocks of flats'. The developments of high-rise buildings in the 1940/1950, for example at Roehampton led to isolation and vandalism. The best such developments are no more than four storeys high and there are convenient, safe green areas for play and recreation. Such complexes still need a concierge function to ensure that they are properly maintained and secure.
68 (a)	Mark Jopling	See 11. Complete re-think of space dedicated to "Big Box" retail.
Would you like to see individual policies and strategies for each of the different parts of the borough (such as Twickenham, Kew, Barnes, Hampton and Hampton Hill etc)?		
Of respondents who answered the question: 19 said yes, 3 said no and 9 said don't know		

Respondent reference no.	Name / Organisation	Detailed comments
[7 did not answer the question]		
Would you like to see individual policies and strategies for each of the different parts of the borough (such as Twickenham, Kew, Barnes, Hampton and Hampton Hill etc)? - If yes, how could they vary?		
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	This is essential if the council discontinue village planning documents. <i>If yes, how could they vary?</i> Some areas are closer to being metropolitan centres such as Richmond and Twickenham, whilst other places are more suburban commuter towns such as Teddington and Whitton. The quietness of Whitton and Hampton Hill etc, is part of their fundamental character that should be protected.
28	Alice Shackleton on behalf of The Kew Society	As different areas vary in their characteristics, yes we would like to see individual strategies. These already exist, however, in the Village Plans with their Character Areas, as well as Conservation Areas. The question does rather suggest that the Council would be open to altering or losing the carefully developed protections in local planning policy for areas and heritage assets – why would this even be open to consideration? <i>[If yes how could they vary?]</i> Refer to existing Village Plans, Conservation Area statements and SPDs.
31	Tim Catchpole on behalf of MESS	Policies can vary based on the Village Plans produced by the Council in 2016
38	Justine Langford on behalf of Ham and Petersham Neighbourhood Forum	Having developed area specific policies for our community through Neighbourhood Planning, we see this as a valuable way of identifying particular issues and objectives in a local area. However, projects need to be coordinated across local areas and boroughs. We encourage inter-borough cooperation as has been achieved between HPNF and North Kingston Neighbourhood Forum (NKNF) and LBRuT and RBK in the development of the Liveable Neighbourhood bid.
40	Jamie Edwards	I live in Twickenham and the lack of investment in our area is clear. Roads are looking run down. Pot holes everywhere. Shop fronts shabby. Rubbish littering the streets. No Doctors appointments available - yet more people are being rammed into the area via new BIG SCALE residential developments (Over station). Conversely, I don't see Richmonds centre showing any signs of wear at all and the streets are always clean. Clearly investment is being made in Richmond then centre, but not Twickenham. Why is this?
41	Anthony Swan	Lots would be similar but there would be individual unique differences and opportunities. eg ask about where protected cycle paths might go. Instead of just wjere houses might be built.
42	Jeremy Gill	By being different, don't be so lazy. One size does not fit all.
44	Roger Cutler	They have very different needs and operate differently. One size never fits all. Richmond has a flourishing traffic-free riverbank. This could never work in Twickenham with its working riverside.
54	Sally Beeson	Each area has its own distinct personality which local people know well.
46 (a)	Joan Gibson	We need to remove the view that certain areas are entitled to protection where others are less valuable so can be built on intensely. This just creates pockets of poor areas which are unpleasant to live in. Time to stop thinking Richmond should have areas of privilege.
48	Roger Wilson on behalf of Roger Wilson Consulting LLP	Dependent on the geography of each area / ward
49	Margaret Edwards	Pros and cons to this approach. I can see for example that Hampton Hill and Ham has more problems with crime and anti-social behaviour than neighbouring areas, that Twickenham is impacted by proximity of Rugby Ground and St Mary's (positive and negative) etc. so might justify area specific plans. However the risk of separate policies is that in reality people use services, travel and move home across the borough. For example Im sure that fly tipping is more of a problem in some areas than others but a borough wide approach would be needed to avoid problems simply being shifted.
51	Su Bonfanti	The key thing is to preserve differences in character, which includes accepting that some places are more 'ordinary' than others, e.g. East Twickenham is more village-y than Richmond, but it's also not got and in my view shouldn't aim for a Jo Malone or an Anthropologie.
52	Winston W Taylor	Not sure although I tend to Yes. I am in favour of decentralisation but am also in favour of a borough identity. Contradictory? Yes. But there must be a balance here.
53	Richard Woolf on behalf of McDaniel Woolf Architects	I think we already have area based strategies

Respondent reference no.	Name / Organisation	Detailed comments
54	Paul Luton	Better to have a coordinated approach. It is impossible to draw precise boundaries.
55	Jon Rowles	Some areas are more suburban such as Whitton, whilst Richmond is more metropolitan.
58	Michael Atkins, Port of London Authority	It may be useful to have specific policies for areas anticipated to undergo significant change through future growth. The PLA considers that there must continue to be specific policies with regard to the boroughs river corridors, currently included in policy LP 18 (River Corridors).
62	Kathleen Massey	By careful consideration of the areas of historic interest in each part of the borough
63	Carol Rawlings	Depending on the individual character of each part of the borough and the need to protect all its green spaces.
64	Johanna Eschbach on behalf of Richmond Bridge Residents Association	Individual policy and strategy required for East Twickenham which represents an untapped opportunity in the borough. - Need strategy to develop the high street and make it more practical for pedestrians and a better place to live for residents. - Need specific policies to reinforce conservation area protection and develop heritage assets of the street The borough needs to build on the Village Plans.
66	Robert Philip Cunliffe	Must be fact based on assessment of the revised population growth (or shrinkage)
67	William Mortimer	There would thereby be an appreciation of the geographical, demographic and historical attributes of each area and, instead of the current 'one-size-fits-all' policy the developments would be tailored so as to retain the heritage of each area. Remember that Hamstead's abundance of green areas was the result of lengthy and historic battles with land owners. The Heath now provides a recreational lung for surrounding communities. By the same good fortune Barnes has the virtue of its Common, The Wetlands, Leg of Mutton, the Green with its Pond and the verdant Tow Path for Londoners to enjoy. These must be defended for future generations. It is also why Mortlake must be given protection as an historic site. William the Conqueror marched from Hastings to Southwark and thence to Mortlake immediately following his success against Harold before turning south to Guildford to cement the invasion. The announcement in the Evening Standard following the unacceptable Council decisions on development of the site seems to think the history of the area started with the brewery. Either a lazy reporter or one who has been misled would you think? What ignorance of the site if this very impression has been underlying decisions by the Council or the Developer.
68 (a)	Mark Jopling	Focused on keeping communities and independent business thriving.
Can you suggest any other ways we could accommodate future growth and new development, ensuring support for sustainable communities?		
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	Much of the existing growth hasn't been properly accommodated, so there is also a 'catch up' requirement. Future growth would be better accommodated if the service roads behind shopping parades / town centres were adopted. A large number of units are being created by converting maisonettes about shops into four or five single bedroom flats – but roads have not been adequately upgraded. Often badly lit, large numbers of potholes, and no proper bin storage. [See photo in Appendix] Result of lack of bin storage for new flats; squalor. Location: Bridge Way entrance to service road to Whitton High Street
31	Tim Catchpole on behalf of MESS	No
38	Justine Langford on behalf of Ham and Petersham Neighbourhood Forum	The HPNP ⁷ identifies 'Opportunity Areas' and sites. Reference: ⁷ The Ham and Petersham Neighbourhood Forum (2019), The Ham and Petersham Neighbourhood Plan Available at: https://www.richmond.gov.uk/media/16749/hpn_plan_2018_to_2033_january_2019.pdf (Accessed 29 March 2020).
39	Solomon Green	There are many ways but only if the Council is prepared to sacrifice some of the current Heritage, Culture and open land which makes the Borough so attractive to overseas tourists, visitors from other parts of Britain and residents of London.
40	Jamie Edwards	NO. No more people please.

Respondent reference no.	Name / Organisation	Detailed comments
41	Anthony Swan	Yes. But NOT building houses
42	Jeremy Gill	Yes, stop talking about growth. it's not going to happen in any way that you could meaningfully plan for. You do us all an injustice by stating so.
44	Roger Cutler	Only by reducing Business rates, improving road & pavement surfaces & putting in more car-parking.
46 (a)	Joan Gibson	By building above offices in business parks, car parks, large shops like Tesco Rugby Road, council owned buildings like community centres - the list is actually endless and can more than swamp the small amount of housing you need to build each year (and all on brown field sites which you can add greenery).
48	Roger Wilson on behalf of Roger Wilson Consulting LLP	Promote walking, public transport and cycling. Stop use of cars and vehicles across the Borough.
49	Margaret Edwards	see 15 above
50	John O'Brien	Build council houses
52	Winston W Taylor	Not enough time to think this through.
53	Richard Woolf on behalf of McDaniel Woolf Architects	Footbridges are the way forward... please support the second stage WSP report.
55	Jon Rowles	- Need to consider the Broad Market Rent Areas, and what impact there would be if they changed. - Need to cooperate with Hounslow and Kingston Upon Thames Councils regarding office space and employment priorities.
60	Kingsley Izundu, The Royal Borough of Kingston upon Thames	See our earlier responses.
61	Tom Minns	Developing office space into housing. This space will come through Covid 19 closing businesses and the increase of working from home that will carry on post crisis.
63	Carol Rawlings	Given the fragility of human life and civilisation, we should concentrate on developing green spaces and any development projects need to be carbon free.
67	William Mortimer	On what premise is growth planning taking place? The anticipated increase in demand for secondary school places has been shown to be wrong at Mortlake. As a result of corona virus we see the country will switch more and more to working from home via the Internet and 5G telephones. Manufacturing in our area which once thrived is now a vestige of former years. Our demography results from an inrush of highly educated and highly paid entrepreneurs operating in a worldwide market place. Making things in the UK will rely on technological innovation and specialist manufacturing more typical of the University Cities like Cambridge and this will happen alongside successful financial services offered in the City of London. If the Council fails to describe its own prescription for a growing 'New Age' vision for this Borough it is difficult to comment usefully on the question raised. Perhaps some research on this topic should already have taken place with the Universities in our area. Are they truly competitive? Is there a need that could be satisfied in co-operation with the Central London Universities?
68 (a)	Mark Jopling	Richmond to become a Borough the leads the green economic revolution,
68 (b)	Mark Jopling	Protect local High Street independent traders, Business Rate reliefs etc
Responding to the climate emergency and taking action		
Do you agree with the proposed policy directions?		
Of respondents who answered the question: 18 said yes, 6 said no and 5 don't know [9 did not answer the question]		
14	Mayor of London	The Mayor welcomes the elevation of the importance of tackling climate change across the borough, making it the very first key objective in the Direction of Travel document. This approach is in line with the Mayor's Good Growth Objective GG6 and his aim that London be a zero-carbon city by 2050. Further policies on addressing Climate Change can be found in Chapters 8 and 9 of the Intend to Publish London Plan.
15	Transport for London	See comments in General section.

Respondent reference no.	Name / Organisation	Detailed comments
		We welcome the Council's commitment to addressing the climate emergency and housing crisis and its recognition of the importance of transport in achieving this, as well as tackling other health and environmental challenges. We strongly support the Council prioritisation of the needs of sustainable travel users, which will help to discourage the use of private vehicles and improve air quality. This will also help achieve the borough's ambition of making walking, cycling and public transport the modes of choice when travelling to and from new developments.
20	Gary Backler, Friends of the River Crane Environment.	We are disappointed that this is couched entirely in terms of development, and those aspects of development that can be tailored to the climate emergency. A balanced response to the climate emergency would recognise an equally or more important role of managing and improving green spaces, river and riparian courses, wetlands and sustainable drainage systems. "Maintaining and enhancing the green infrastructure network" is just a single bullet well down a list of planning policies to "develop in a way that respects environmental limits" (pp15-16). The policies lack any proposals for enhancing open spaces that are of equivalent specificity and detail to those for green roofs and smart meters, for example. "What do we have to do?" (p17) is focused much more on how to "deliver high quality sustainable development" than on how to improve green infrastructure to promote the low-carbon society.
22	Jimmy Wallace, Richmond Athletic Association	We broadly welcome and support the proposed approach to developing appropriate planning policies to tackle the climate change emergency. On p.17 a series of 'policy directions' are discussed and to provide a co-ordinated approach with the borough's overall vision and spatial strategy, it would be worth ensuring that the specific climate change policies make it clear that direct most development and growth in the borough to the most sustainable locations in transport and access terms can assist in helping to tackle the climate emergency.
27	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond	Responding to the climate emergency and taking action 15. We broadly support the Council's Climate Change Emergency Strategy approved in January 2020 and the Council's Air Quality Action Plan and in particular actions to reduce the high levels of NOX and particulates in Central Richmond in view of the substantial harm to the health of residents, visitors and employees and particularly the vulnerable. 16. We note from the DfT's current consultation on Transport De-carbonisation that in 2016 Transport represented 26% of carbon emissions, energy supply 23%, Business 18% and residential 15%. We also refer below in the transport theme to carbon and air pollution in Central Richmond. 17. We support research into decentralised energy opportunities recognising that Central Richmond might be a candidate for early consideration. 18. Buildings around the Green, because of their age and listing, are difficult to insulate and install new technologies for heating and generating power. 19. We broadly support initiatives on the circular economy and note the negative impact on the environment in Central Richmond, the Riverside and the Green from refuse on the streets, the open spaces and in the river Thames itself. 20. We support recognition of the potential impact of climate change on tides and flooding and the potential impact on the Riverside. 21. We believe the policies in the current Local Plan covers climate change and air quality issues adequately and if further amplification is required we would suggest that it could dealt with by subsidiary planning tools.
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	We broadly support them. However, the existing policies are often not carried out in practice because so many developers claim extenuating circumstance. There is also appears a non-existent inspection regime for ensuring that things like green walls and roofs are maintained. The council needs to have a policy on this put in conditions in planning applications for access to periodically inspect them. For example, the green wall at Twickenham School Sports Hall is much smaller than its supposed to be, and the green wall on the RFU energy centre on the MOL next to the Duke of Northumberland's River has no plants on its green wall.
35	Alice Roberts, CPRE London	The Local Plan must draw critical links to transport targets, and air quality and climate emergency action plans As transport is the largest emitter of Greenhouse Gas emissions the borough should encourage car-free/'lite' development as well as advocating a shift in travel behaviours to more sustainable modes of transport. The Local Plan should directly reference the borough's targets: <ul style="list-style-type: none"> • To reduce car trips from 41% of all trips to 25% of all trips • To increase the number of Richmond residents doing at least the 20 minutes of active travel they need to stay healthy each day, from 36% to 70% • For 72% of the population to be 400m from the strategic cycle network (have access to a safe and pleasant cycle network) • To reduce the number of people killed or seriously injured on Richmond's roads from around 70 per year to zero

Respondent reference no.	Name / Organisation	Detailed comments
		<ul style="list-style-type: none"> Additionally, to reduce car ownership, traffic volumes and air pollution, and to improve bus times, and for more people to be using public transport (targets in TfL's LIP3).
38	Justine Langford on behalf of Ham and Petersham Neighbourhood Forum	<p>Achieving high standards of sustainability and addressing climate change is supported in HPNP (section 8) Transport comprises the largest source of carbon emissions at 27% and 40% of trips are under 2 miles. New development should address this significant contributor to climate change:</p> <ul style="list-style-type: none"> Be located near to good public transport and/or improve public transport. Enable new residents to travel sustainably and by active travel through the provision of attractive, direct and safe infrastructure for walking and cycling to local town centres and transport hubs as part of the development. Reduce car parking and increase convenient and secure bike parking and provision of cargo bike and car share schemes. <p>Residential energy use comprises 15% of carbon emissions³. The plans acknowledges higher standards in new development, but with most of housing stock existing and in conservation areas and/or heritage status, the plan should support for future proofing existing housing stock including that of heritage status. Reference: ³ London Borough of Richmond upon Thames Climate Change and Sustainability Strategy (2019) Available at: https://www.richmond.gov.uk/media/17738/climate_change_and_sustainability_strategy_2019_2024.pdf (Accessed: 29 March 2020).</p>
39	Solomon Green	There is no climate change emergency. CO2 is a greenhouse gas but only the third most potent out of at least twelve in our atmosphere. Out of 90 IPCC approved CMIP5 climate models, the forecasts of only one, a Russian model comes close to replicating the observed increase in global warming. All the others have produced forecasts that were way above acceptable margins of error. This part of the plan smacks of panic.
40	Jamie Edwards	There is no climate emergency in the UK. It's china, the US, Russia and India that produce all the pollution. We contribute 1% of Global Co2. You have other priorities
41	Anthony Swan	I have not read the Climate Emergency Strategy doc of 2020. I agree key Issues.
42	Jeremy Gill	You don't have direction. The above is just box-ticking. You covered your arses, well done.
46 (a)	Joan Gibson	I am concerned about the speed of response to the climate emergency. An emergency needs quick / immediate action. The timetable for this addendum suggests you will not take action until 2024 at the earliest. A quicker response is needed with adoption in 2020.
48	Roger Wilson on behalf of Roger Wilson Consulting LLP	We should: promote walking, public transport and cycling, and stop use of cars and vehicles across the Borough.
55	Jon Rowles	Jumps straight into zero carbon - need more of an introduction and how to avoid past mistakes such as diesel cars better due to less CO2 despite the increase in other pollutants.
61	Tom Minns	Cars are not necessarily the work of satan that you present them as.
63	Carol Rawlings	Development of Ham goes against the policy directions as it is far from any town centre.
64	Johanna Eschbach on behalf of Richmond Bridge Residents Association	We support zero carbon standards for all development not just large schemes; we are conscious that much development in Richmond is technically not large scale, but it may still have significant impact locally, e.g. the redevelopment of Ryde House in East Twickenham for a supermarket and school. In assessing any significant development, its wider impact on the borough's carbon footprint, both directly and indirectly - through traffic generation for example - must be considered. - We are concerned that current practice on Flood Risk Assessments is inadequate: they are entirely tick box documents which always conclude that a new development, even with a basement, will not increase flood risk to other properties. Water has to go somewhere, and cumulative small scale developments seem likely to undermine the overall direction. Is it possible to provide more information on practical proven solutions, eg for small scale sustainable urban drainage, and to insist on them for all proposals? 4 We support the council's focus on concrete action to improve air quality, and contributing to the global effort to address climate change, but are unsure whether the current policies will lead to sufficient action.
66	Robert Philip Cunliffe	Directions yes, however the ambition of speed of achieving them is FAR to slow
67	William Mortimer	Within the limitations described in earlier answers

Respondent reference no.	Name / Organisation	Detailed comments
68 (b)	Mark Jopling	Yes though not strong enough in presumption of protecting Biodiversity and Green Space. Richmond can best honour Sir David Attenborough by committing to leading London on green Policy, as part of "National Park City"
How can we promote high quality sustainable development as part of a new Local Plan?		
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	Need to show homeowners and developers how it can be done more economically as an intrinsic part of the design rather than a last-minute add-on. Smaller developers and homeowners are less likely to have the ability to cost control and can be at the mercy of architects creating an expensive bespoke scheme – and this often results in the environmental aspects being sacrificed. When allowing new housing to be built you must ensure that you can provide the school places locally – otherwise there is a massive environmental impact of having to accommodate the pupils in an out of area school. This recently occurred with Turing House School development in Whitton, but where most of the pupils will come from a catchment area based in Teddington. A key principle in sustainable development is proximity, and this needs to be made clearer in the new local plan.
28	Alice Shackleton on behalf of The Kew Society	This is already dealt with in the adopted Local Plan and appropriate SPDs and insofar as the draft London Plan would create new or more rigorous requirements, the adopted Local Plan can be altered to conform.
31	Tim Catchpole on behalf of MESS	Ensure less hard surfacing and protect soft ground for soakaways.
39	Solomon Green	Employ experts (from) both sides of any argument to analyse and criticise all suggestions, so as to lessen the chance of getting it wrong.
40	Jamie Edwards	It's a false flag. A vanity project. There are other priorities.
41	Anthony Swan	Thermal and Energy criteria could be defined and enforced by Planning and Building Control
42	Jeremy Gill	You can't. It will either happen or it won't. What you need to is manage it as it happens.
43	Paul Hart Prieto	One challenge for the resident is that the cost of low carbon energy sources is too high. One example is the need to change a heating system on a residential property. to install a new Gas boiler costs 3 to 8 thousand pounds. for an Airsource Heat pump its 11 to 20 thousand pounds. Even with RHI returns over 7 years the initial and upfront cost makes low carbon heating (as the grid changes its mix) is still a barrier for the home owner. More could be done to incentivise as well as plans for communal based heating conversion for residents i.e. shared ground source heatpump on a street. certified richmond installer with an economy of scale on purchase of equipment etc.
44	Roger Cutler	More car-parking so people don't have to drive around searching for spaces. Many, many more battery charging oints for all the battery cars to come. Re-institute dredging to reduce flooding. Ensure no developments in flood areas such as the embankment in Twickenham. Use better planners & developers not the cheapest.
54	Sally Beeson	Use building companies which use methods which chime with the Council's views
46 (a)	Joan Gibson	I feel you are starting from the wrong assumption when you say LBRuT already requires high standards of sustainable design and construction. The reality is this is just not the case and you accept the minimum standards outlined in the NFFP and London Plan. See THS, and Lidl developments in the Twickenham area. Your interpretation of carbon neutral is incorrect. THS is being built on a green field site – fully supported by LBRuT planning. The development will increase carbon emissions, but LBRuT have accepted very little green roof, biomass boilers and BREAM Good rather than excellent. This will all result in a development which will increase carbon emissions. If you believe this is a working practice where you require higher standards of sustainable design and construction then any change to the Local Plan will fail due to your low expectations. So you need to change your view of what LB RuT delivers now and have a target of delivering more than zero carbon developments.
48	Roger Wilson on behalf of Roger Wilson Consulting LLP	Promote walking, public transport and cycling. Stop use of cars and vehicles across the Borough.
49	Margaret Edwards	Introduction of area wide heat/hot water systems - not sure how this is done in practice but in blocks of flats this can maximise space in each flat and reduce costs and greenhouse gases. Similarly use of ground source heat pumps in new developments and solar power.
50	John O'Brien	Build council houses - you set the standard and then deliver it.

Respondent reference no.	Name / Organisation	Detailed comments
51	Su Bonfanti	I support the general policy direction. I support zero carbon standards for all development not just large schemes; I know that much development in Richmond is technically not large scale, but it may still have significant impact locally, e.g. the redevelopment of Ryde House in East Twickenham for a supermarket and school.
52	Winston W Taylor	Engagement with the industry
62	Richard Woolf on behalf of McDaniel Woolf Architects	Work with Transport for London and the Port of London Authority on our key resource , the river.
54	Paul Luton	Needs to be integrated with the transport section that has been hived off below.
55	Jon Rowles	As the plan is supposed to be medium-term - there needs to be a mechanism so that standards are improved over time.
58	Michael Atkins, Port of London Authority	Ensure that as part of the construction stage of developments, full consideration is given to the use of the boroughs waterways as part of the transportation of construction materials and waste to/from development sites, either directly or via the supply chain.
60	Kingsley Izundu, The Royal Borough of Kingston upon Thames	Adopt planning policy approaches requiring large scale developments to be zero carbon and setting out a clear path to zero carbon standards for all types of developments.
63	Carol Rawlings	Encourage and help residents and commercial businesses with the installation of heat pumps, solar panels and other sustainable sources of heating. Take a lead in this with regard to council properties. Encourage cycling and walking by separating them from each other and from vehicle transport.
64	Johanna Eschbach on behalf of Richmond Bridge Residents Association	- By not encouraging car traffic to the area and creating car parking in busy roads! - Having a sustainable travel plan
67	William Mortimer	Without a study using the experience of industries and universities setting forth the basis for the growth plan it is simply pie-in-the-sky to be asking this of the individual citizen.
68 (a)	Mark Jopling	Stricter penalties and disincentives for trying to develop protected space
68 (b)	Mark Jopling	Be more creative with the existing developed footprint
How can we continue to set out a pathway to zero carbon?		
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	Many houses in Richmond borough are installing air conditioning – thus thought needs to be given to how houses under the flight path can be cooled at night without having to resort to power hungry air conditioning School travel patterns have to be considered – may need extra developer contributions to secure sites for new schools otherwise we will lose more green space. Large event venues like Hampton Court Palace (which hosts flower shows and concerts) and Twickenham Stadium attract huge numbers of spectators who arrive by car. There is a need to reduce this – as they have a large CO2 footprint and can reduce local residents' quality of life if roads become gridlocked.
31	Tim Catchpole on behalf of MESS	Encourage greater use of alternative energy. Discourage car travel, particularly for shopping.
39	Solomon Green	Not to bother Carbon is one of the two most essential elements for all human and plant life..
40	Jamie Edwards	Impossible to achieve. The volume of Electricity required to go Carbon Zero in the UK by 2035 would require 26 Nuclear Power stations.It's a pipe dream.
41	Anthony Swan	Planning and building refurbishments should meet strict criteria and be ENFORED. Just like the eg Fire Regs
42	Jeremy Gill	Try turning a few lights off in your buildings that blaze away all night. Use less energy in other ways. You're setting out ways to use huge amounts of energy by doing away with things that are still good for purpose. A well constructed building that uses a lot of energy in the making is less wasteful than a poorly constructed low carbon structure that falls apart after forty years.
43	Paul Hart Prieto	Schemes to share new, low carbon heating across residential properties, replant larger woodlands in bushy park and richmond park, mandate all new builds have solar and wind, use waterways to generate heat and electric for the borough,

Respondent reference no.	Name / Organisation	Detailed comments
		<p>generate an economy of scale for residents with shared purchasing power of greener alternatives Autonomous "uber style" low carbon vehicles for the public to use. Hydrogen based public transport with intelligent routing based on demand etc.</p>
44	Roger Cutler	<p>Massively more battery charging points provided quickly. In the next 5-10 years the earth will cool anyway as it's orbit around the sun takes it further away. Better roads that allow traffic to get through more quickly. Widen roads & reduce cycle lanes. Cyclists don't use them. They cycle illegally, & dangerously, on the pavements. More car parking to get cars stationary so they don't pollute.</p>
45	Sally Beeson	<p>Fight Heathrow expansion and build sustainably Penalise parents who drive to local primary schools when their children only live ten minutes away by foot at most</p>
46 (a)	Joan Gibson	<p>Creating Carbon neutral developments is also not enough. If the world keeps emitting the same amount of CO2 as it currently does world temperatures will rise more than 1.5degrees. We have to plan to remove CO2 from the atmosphere. This is the target you should have. With the target to remove CO2 from the atmosphere new developments need to have: Rain water harvesting for toilets The highest level of lagging possible Double glazing Electric boilers, ovens and appliances to take advantage of expanding levels of "clean" electricity Lights that automatically turn off Appliance switches that shutdown so the appliance is not left on standby 30% tree canopy and lots of hedges / grass / flowers (all native species). Keep the lawn area to a minimum as it consumes a huge amount of carbon via lawn mowers, feeds etc. etc. All hard landscaping / paving to be porous so rainwater will drain away All rain water runoff to go into soakaways Shower and bath water collection for watering the garden Routes for wildlife Bird habitats / boxes Insect walls All boundary fencing made up of hedges Full green roofs Wind and solar power capture Cooling towers Car free designs and marketing Separate walking and cycling access Cycling hubs Secure cycle storage Heat sinks Ground / air heat pumps Build must have zero defects as this reduces efficiency of lagging etc. Future proofing must be built in to reduce the cost of maintenance – so easy access to such things as boilers, electricity supply, pipes etc. Signs for anti-idling Signs to encourage active travel Waste management during construction and when occupied –</p>

Respondent reference no.	Name / Organisation	Detailed comments
48	Roger Wilson on behalf of Roger Wilson Consulting LLP	Promote walking, public transport and cycling. Stop use of cars and vehicles across the Borough.
49	Margaret Edwards	Not sure that it is feasible to do local things re domestic heating and hot water in existing homes as too costly to subsidise and unlikely that people will swap. Council could circulate info re links to websites re efficient boilers etc in the Council Tax bills.
52	Winston W Taylor	Again engagement with the industry. They have to know what we expect
53	Richard Woolf on behalf of McDaniel Woolf Architects	Keep stressing the need for sustainable transportation.
54	Paul Luton	Requiring the highest available standards for all new developments and promoting the improvements to existing housing stock.
56	Rob Kennedy, Environment Agency	Ban diesel lorries and buses from the borough, look at electric versions of both.
60	Kingsley Izundu, The Royal Borough of Kingston upon Thames	Encourage the development and expansion of decentralised energy networks and the re-use or recycling of used materials for as long as possible. Effective community engagement which encourages everyone to play their role in reducing consumption and greenhouse gases. The need to deliver high quality sustainable development should be maintained as a high priority for the borough.
61	Tom Minns	Free public transport for all. It would reduce car usage considerably as it has done with the senior citizen freedom pass. It really is a mind changer
63	Carol Rawlings	As above plus tree planting, wild flower and meadow cultivation, discourage private transport. Make Richmond town centre car-free? Close Richmond Park to traffic apart from between Kingston and Richmond. New buildings must be zero carbon and old buildings adapted to make them as near zero carbon as possible. Grants for solar panels and heat pumps. Free disposal of gas boilers.
66	Robert Philip Cunliffe	engage Imperial College to advise
67	William Mortimer	Alternative energy evaluation Must include hydrogen, heat pumps using sub-subterranean energy and mini cold-reactor nuclear technology. These have all been mooted in the engineering journals for years as well as wave and wind power and yet we need to understand storage solutions of electrical power and delivery of hydrogen gas will be possible before considering the feasibility of convert home boilers or building suitable cars.
68 (a)	Mark Jopling	Improved adoption of electric transportation Dedicated cycle routes
68 (b)	Mark Jopling	More EV charging and car-sharing infrastructure More dedicated cycle routes
How ambitious shall we be in requiring zero carbon standards for all developments?		
27	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond	14. We support zero carbon initiatives for all developments. We note the Appeal Court's recent decision concerning the inadequate account of the Paris Agreement in the Airports National Policy Statement 2018, and we observe that development policy more widely may have to pay closer attention to national commitments on climate change.
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	We recommend having a mechanism so that standards can be increased as they become more affordable / widespread.
28	Alice Shackleton on behalf of The Kew Society	This would require zero carbon for major and non-major developments. That is an aim to be welcomed but consideration must be given to the reality of economic viability of compliance, for, say, work done to period properties/homes.
31	Tim Catchpole on behalf of MESS	We should aim for zero carbon by 2030 not 2050.

Respondent reference no.	Name / Organisation	Detailed comments
39	Solomon Green	Not ambitious just mistaken.
40	Jamie Edwards	You shouldn't. Quite frankly we don't need new developments or people. You should be using money to help existing residents become more energy efficient. We don't always need to obsess about GROWTH. Improving productivity of existing assets will make a bigger difference.
41	Anthony Swan	Totally ambitious and supportive at planning stage.
42	Jeremy Gill	Not very. Get value for your energy spend.
43	Paul Hart Prieto	Zero or negative mandates on new build Pragmatic cost based mandates on existing builds and council support for improvements
44	Roger Cutler	100%
45	Sally Beeson	Totally please, as there always has been a compromise halfway down the line I'm sure!
46 (a)	Joan Gibson	This is not ambitious enough you should require a net reduction in carbon emissions for the area - this is achievable.
48	Roger Wilson on behalf of Roger Wilson Consulting LLP	Very - else London will flood in my childrens' lifetimes
49	Margaret Edwards	It should be possible for developers to achieve this so stick with it as a requirement.
52	Winston W Taylor	This is non negotiable if we are to meet the challenging targets.
53	Richard Woolf on behalf of McDaniel Woolf Architects	You should temper best option solutions at the time , against the perfection of a zero carbon community.
54	Paul Luton	The council has declared an emergency so as far as possible.
60	Kingsley Izundu, The Royal Borough of Kingston upon Thames	Set out a clear path to zero carbon standards for all developments, subject to viability and effectively monitor their implementation.
61	Tom Minns	Keep it in mind but don't get single issue fixated. It will be more effective if you can take people with you rather than imposing restrictions which people will fight.
63	Carol Rawlings	All developments should be required to be zero carbon and should be inspected for this on completion and at set periods after they are in use. Failure to comply should result in the maximum penalties possible, including demolition.
64	Johanna Eschbach on behalf of Richmond Bridge Residents Association	As ambitious as we can but still be realistic (give factual evidence why low zero carbon standards are possible)
66	Robert Philip Cunliffe	not "ambitious", but rather 100% "dedicated" to achieving zero carbon, or even better standards. Show some real leadership
67	William Mortimer	Be as ambitious as you possibly can be because the country will need elbow room to keep our farmers producing the food we need without having to ship in cargoes by air and sea at vast cost and at the mercy of overseas powers. We should all eat less and this too would improve health as a look at WWII diets and health will surely confirm.
68 (a)	Mark Jopling	New builds will need to be different to conversion of older property. Program to improve efficiency of the Victorian housing stock
68 (b)	Mark Jopling	very on new builds Separate scheme to insulate Victorian Housing stock
70	Melissa Compton-Edwards	Very ambitious.

Are there other planning means to mitigate and adapt to climate change that you want us to pursue?

Of respondents who answered the question:

Respondent reference no.	Name / Organisation	Detailed comments
17 said yes, 3 said no and 3 said don't know [15 did not answer the question]		
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	Need to deal with "soil sealing" and degradation. Please see this webpage for details of this issue and how it can be reduced https://www.recare-hub.eu/soil-threats/sealing Need to look at removing tarmac verges and replacing them with grass. maybe stipulate that a new tree has to be planted for each new housing unit – on or off site.
31	Tim Catchpole on behalf of MESS	See above
39	Solomon Green	Yes delay all action for another thirty years to confirm whether the globe is still continuing to warm or whether as the consensus of climate scientists were forecasting as late as the 1970s we were entering into a dangerous climate cooling phase.
40	Jamie Edwards	It's not the top priority
41	Anthony Swan	Solar energy. Turbines at Teddington Lock. Wind turbines.
43	Paul Hart Prieto	Autonomous "uber style" low carbon vehicles for the public to use. Hydrogen based public transport with intelligent routing based on demand Schemes to share new, low carbon heating across residential properties, replant larger woodlands in bushy park and richmond park, mandate all new builds have solar and wind, use waterways to generate heat and electric for the borough, generate an economy of scale for residents with shared purchasing power of greener alternatives etc.
44	Roger Cutler	Stop concreting of front gardens & re-allow rain water to escape.
45	Sally Beeson	I wish that Local Councils weren't overruled by unelected so called experts on local planning issues. The law needs to change to protect our environment from over building, building on protected green spaces and school playgrounds.
46 (a)	Joan Gibson	Further to this LBRuT can run a campaign to get current households to switch lights off, and appliances from standby. No cost to the household and it drastically reduces energy consumption so reducing our impact on the environment whilst saving us money.
48	Roger Wilson on behalf of Roger Wilson Consulting LLP	Zero carbon as soon as possible for the Council and for all residents, businesses and premises in the Borough. Many benefits economically, for the climate, and socially.
49	Margaret Edwards	When we did major work on a property it was difficult to access information or support on recycling building materials - it was too time consuming to arrange for either us or our builder. I dont know what happens to the contents of most skips but I expect they end up in landfill. Given the amount of renovation underway in the borough this is an area where there needs to be information provided (perhaps at time of planning application etc) and perhaps an incentive to recycle.
50	John O'Brien	Greater use of and encouragement to use solar panels. Emerging technologies can allow tarmac road surfaces to generate power, allow footfall in public spaces to generate power, allow heat pumps to extract power from rivers and we have a big one in the borough. Offer free parking and other advantages to all fully electric vehicles.
52	Winston W Taylor	Not enough time to consider this. It would involve a lot of reading from previous consultations to answer this properly.
53	Richard Woolf on behalf of McDaniel Woolf Architects	Review the WSP Pedestrian and Cycle Bridge Feasibility Study of October 2018 and commission the next stage report. [A copy of the WSP Report was provided, which is available at https://www.richmond.gov.uk/media/16409/thames_bridge_feasibility_summary.pdf]
58	Michael Atkins, Port of London Authority	There must continue to be full support within any future Local Plan for the encouragement of the use of the River Thames for passenger and freight transport through the protection of, improvement to, and provision of new relevant infrastructure including wharves, slipways and piers. In addition, the PLA considers that there must be support must be given to the potential use of existing piers and structures as part of the delivery of small scale

Respondent reference no.	Name / Organisation	Detailed comments
		freight and 'last mile' delivery as well as for the maximisation of use for passengers over the timescales of the Local Plan. This will help to achieve the Borough's sustainable travel goals with regard to improving air quality and decreasing road congestion for local communities.
61	Tom Minns	Expand assistance for apartment blocks to install EV points. They really are the low hanging fruit as you can encourage the move to full electric cars in large numbers.
62	Kathleen Massey	Not Answered
63	Carol Rawlings	No expansion of Heathrow airport. All public and private transport to become carbon neutral. Penalties for non-recycling (as Japan has had for decades). Use of transparent bags where possible so that inappropriate disposal of recyclable items can be easily identified. Food composting to be made obligatory (some flats still don't have the facility to do this).
66	Robert Philip Cunliffe	Engage with the wider Climate change movements to investigate how harnessing with other London boroughs can yield both cost savings and more efficient use of resources
67	William Mortimer	What I understand is that the Council does have a Disaster Management Plan and it is vital to see the Flood Risk elements of this to know whether there is a coherent approach enabling local communities to handle some of the obvious needs. I have previously provided a document suggesting the bare bones of a plan in event of flood or indeed any disaster that renders key local infrastructure useless and the immediate needs for evacuating people from the area. There are two key locations to support the infrastructure for such emergency management by a local team. These are, firstly, the third railway track over the river at Barnes Bridge. The river here was formerly the docking point for the River Police and hence is suitable for the inter-connection of supplies coming by water to the land-based teams working in the area. The second is the building formerly housing the manual signalling activity and point management for the railway lines from Waterloo to Richmond and the loop line via Hounslow . I will send you, upon request, the document I previously provided to LBRuT, which also suggests the sort of materials to be stored on Barnes Bridge in order to support the sustenance and evacuation of local people. The land owned by the railway company where the lines split at Vine Road may also be useful for other Council developments.
Are there any other climate change and/or sustainability issues that you would like the new Local Plan to address?		
29	Richmond Cycling Campaign	P14-17 talks about the climate emergency. We welcome many of the steps proposed here, especially the sustainable urban drainage programme, which has had such beautiful results elsewhere in the country. While transport is covered elsewhere in the paper, we think more needs to be made of it in this section. Transportation produces 1/3rd of emissions, yet is not covered in detail here. We would like to see commitments, in this context: <ol style="list-style-type: none"> 1. For everyone new home and office to have safe and secure bicycle parking for all residents and visitors 2. For every home, office or place of interest to be immediately accessible to local people by walking and cycling. This means the borough needs a dense 'mesh' of cyclable routes never more than 200m from each other. 3. A requirement on all deliveries in the area to be managed by consolidation hubs, ensuring that 'last mile' fulfilment is never by motor transport unless specific factors make this impossible. 4. Removal of all council subsidies for driving - whether this is parking, driving, or the wide range of other activities the council has to undertake because of the damage caused to our built environment by motor vehicles. Additionally, we'd also like this section to either include or potentially commission research to look at the carbon benefit of the different ways of moving transport choices to walking and cycling over driving.
30	Jon Rowles on behalf of Friends of Heathfield	Need to explicitly include the sustainability "proximity principle" into the local plan Loss of front gardens – new housing units could have legal agreements to stop gardens being lost to hard standing.

Respondent reference no.	Name / Organisation	Detailed comments
	Recreation Ground and Environs	Current guidelines for home extensions encourage traditional pitched roofs – however, could some of these be substituted for green / brown roofs in certain circumstances, such as the back portion. Environmental value of back gardens / back lands both as a habit and as a wildlife corridor is under appreciated. Need to record wildlife corridors and make the various railway tracks SINC's, this will also help prevent the loss of habitats caused by Network Rail selling land adjacent to railway tracks to neighbouring homeowners. Need a spoke of cycle routes leading out of the town centres into their catchment areas. In the past the focus of cycle lanes has been the longer-distance routes linking up towns rather than encouraging people to switch from the car for short journeys within their own town.
31	Tim Catchpole on behalf of MESS	See above
39	Solomon Green	Prepare for the possibility that, as more than 30,000 scientists (including some climate scientists) believe, the so-called consensus is wrong.
40	Jamie Edwards	NO> See above. Utterly mad to make this a top priority.
41	Anthony Swan	Educate and coordinate peoples understanding of what can be recycled, which bin to put it in and what to do with anything that "Can't" be recycled.
42	Jeremy Gill	No
43	Paul Hart Prieto	Look into ground water level management to reduce risk of ground water flooding.
44	Roger Cutler	More re-cycling & less in landfill.
47	Trevor Rowntree	I think that recycling should be compulsory and I am in favour of fines for households/business that do not recycle. Also fly tipping should be fully investigated and punished.
49	Margaret Edwards	All households that put out food and/or garden waste on regular basis should have free compost delivered twice a year. The system for collecting very small free bags of compost did not work - lots of people came by car assuming large bags and so not very sustainable.
51	Su Bonfanti	I am concerned that current practice on Flood Risk Assessments is inadequate: I've looked at a few applications for small scale local development and those are entirely tick box documents which always conclude that a new development, even with a basement, will not increase flood risk to other properties. Water has to go somewhere, and cumulative small scale developments seem likely to undermine the overall direction. Is it possible to provide more information on practical proven solutions, eg for small scale sustainable urban drainage, and to insist on them for all proposals?
52	Winston W Taylor	Again, not enough time.
53	Richard Woolf on behalf of McDaniel Woolf Architects	Possible central combined heat and power plants.
55	Jon Rowles	Many of the new housing units may be zero carbon - but if facilities needed to support them are not close at hand this can create far more carbon - things like food shops, schools etc and all create a lot of journeys.
58	Michael Atkins, Port of London Authority	The PLA recently published its Air Quality Strategy (2018) and is currently developing an update to this in line with government guidance. This strategy, which includes a five year action plan, covering the period 2018 - 2022 must form part of the evidence base as part of the development of the Local Plan.
60	Kingsley Izundu, The Royal Borough of Kingston upon Thames	None
63	Carol Rawlings	The development plan for Ham should be re-addressed as it would double private car use on very narrow roads, some with 90 degree bends which are already dangerous. It would also lead to pollution issues, and increased incidents of accidents. It would decrease the amount of open space as current green areas around blocks of flats would disappear and the character of Ham Village Green would become urbanised.
64	Johanna Eschbach on behalf of Richmond Bridge Residents Association	Yes: how will we decrease environmental pollution outside of restrictions on new developments? How can we include new rules on developments that are in progress and get them to adapt now? If we only have policies in place for 2024 then it means significant developments over the next 5 years will be developed permanently with low standards in terms of sustainability and addressing climate change. It's an urgent issue that we need to tackle now.
66	Robert Philip Cunliffe	Yes - rising sea levels are a fact, not an imaginary threat. Plans to accommodate a MUCH higher rate of rising than previously planned for need to be explicit NOW

Respondent reference no.	Name / Organisation	Detailed comments
67	William Mortimer	Experience of the current Covid-19 epidemic simply underlines the need for reliable broadband communications and the Disaster Management Plan needs to consider how services will be sustained inf the terrestrial infrastructure has been compromised. Satellite communication offers enormous potential but is limited in the amount of traffic it can handle. there needs to be careful consideration of the services to be accorded priority and the existing infrastructure to be used.
68 (b)	Mark Jopling	Major "offload" multi-modal transport hub just SW of M3 Jn 1. Park and ride for cars coming into Richmond and beyond into Central London from private cars to public transport via SW Trains and Crossrail 2 onto the Shepperton Line.
69	Geoff Bond on behalf of Ham and Petersham Association	Make working from home easier.
70	Melissa Compton-Edwards	<p>As transport is the largest emitter of greenhouse gases, the borough should encourage car-free/car-lite development and advocate and enable a shift in travel behaviours to more sustainable modes of transport: walking, cycling and clean public transport. As per CPRE London's suggestions, the Local Plan should directly reference the borough's transport, air quality and climate emergency action plan targets:</p> <ul style="list-style-type: none"> "- To reduce car trips from 41% of all trips to 25% of all trips - To increase the number of Richmond residents doing at least the 20 minutes of active travel they need to stay healthy each day, from 36% to 70% - For 72% of the population to be 400m from the strategic cycle network (have access to a safe and pleasant cycle network) - To reduce the number of people killed or seriously injured on Richmond's roads from around 70 per year to zero - Additionally to reduce car ownership, traffic volumes and air pollution and to improve bus times, and for more people to be using public transport (targets in TFL's LIP3)." <p>Agree with Richmond Cycling Campaign that while transport is covered elsewhere in the paper, more needs to be made of it in this section. Would like to see commitments, in this context:</p> <ul style="list-style-type: none"> - For everyone new home and office to have safe and secure bicycle parking for all residents and visitors - For every home, office or place of interest to be immediately accessible to local people by walking and cycling. This means the borough needs a dense 'mesh' of cyclable routes never more than 200m from each other. - A requirement on all deliveries in the area to be managed by consolidation hubs, ensuring that 'last mile' fulfilment is never by motor transport unless specific factors make this impossible. - Removal of all council subsidies for driving and parking - because of the damage caused to our built environment by motor vehicles. <p>Additionally, I'd also like this section to either include or potentially commission research to look at the carbon benefit of the different ways of moving transport choices to walking and cycling over driving.</p>
Delivering new homes and an affordable borough for all		
Do you agree with the proposed policy directions?		
Of respondents who answered the question: 10 said yes, 9 said no and 6 don't know [13 did not answer the question]		
Do you agree with the proposed policy directions? - If you disagree with any of the policy directions please tell us more here:		
14	Mayor of London	<p>Housing</p> <p>The Mayor welcomes that Richmond recognises the borough's new housing target for the delivery of 4,110 new homes between 2019 and 2029, as set out in the Intend to Publish London Plan in Table 4.1. The Mayor would like Richmond to aim to exceed this target in line with his spatial strategy through greater delivery of housing from small sites to take account of the shortfall in meeting identified housing need across London. The borough's minimum small sites target for this period is 2,340 homes.</p> <p>With regards to the delivery of small sites, the Panel Report specifically states that the small sites target in the London Plan can be taken to amount to a reliable source of windfall sites which contributes to anticipated supply and so provides the compelling evidence in this respect as required by paragraph 70 of the National Planning Policy Framework of 2019.</p>

Respondent reference no.	Name / Organisation	Detailed comments
		<p>While Richmond's Local Plan needs to consider the National Planning Policy Framework 2019, the Planning Practice Guidance (Paragraph: 013 Reference ID: 2a-013-20190220) is clear that where a spatial development strategy has been prepared by the Mayor, it is for the relevant strategic policy-making authority to distribute the total housing requirement which is then arrived at across the plan area. Richmond's housing target is set out in the London Plan.</p> <p>Beyond 2029, the Plan's proposed housing target should be based on a combination of the figures taken from the SHLAA 2017, local up-to-date evidence of identified capacity and the small sites target, which should be rolled forward in accordance with paragraph 4.1.12 of the Intend to Publish London Plan.</p> <p>The Mayor welcomes Richmond's intention to undertake a Local Housing Needs Assessment but this would be based on the government's standard method. To be clear, Richmond should conduct a Strategic Housing Market Assessment in accordance with paragraph 4.10.5 of the Intend to Publish London Plan so that the borough has an understanding of housing needs in its area including tenures, housing for the elderly and the needs for different sizes of dwellings among others.</p> <p>The Mayor is pleased that Richmond will consider the needs of Gypsies and Travellers in its housing need assessment. Richmond should note that the Mayor intends to lead a London-wide Gypsy and Traveller accommodation needs assessment. It should also note the Secretary of State's Direction on Intend to Publish London Plan Policy H14.</p>
17	Hannah Bridges, Spelthorne Borough Council	<p>In respect of housing, we recognise that this is a strategic and cross boundary issue. Officers acknowledge that like Spelthorne, Richmond is a constrained borough and we face many similar constraints, however every effort should be made to meet its Local Housing Need within the borough boundaries and no stone should be left unturned in determining an appropriate strategy to guide the new Local Plan. We are supportive of the use of up to date evidence to inform the potential options.</p> <p>Richmond should also look to the wider Greater London area to assist meet its housing needs if it is unable to do so alone.</p> <p>Spelthorne Local Plan Officers at Spelthorne are currently in the process of reviewing the representations received to the Preferred Options consultation. We are also undertaking further site assessment work to firm up the site allocations and aim to maximise supply. Whilst Spelthorne intends to meet its housing needs within its Borough Boundaries, our estimates show that we will only just be able to meet our standard method housing need figure. In addition, Planning Practice Guidance sets out that Local Housing Need is a minimum starting point in determining the number of homes needed in an area. If it transpires that Spelthorne is unable to meet its own needs within the Borough, we will need to work with Duty to Cooperate partners in order to explore all options to meet our local housing needs.</p> <p>Following the completion of our further site assessment work we will reflect on our housing position to determine the next steps for our Local Plan, which in turn will inform our Duty to Cooperate discussions with all neighbouring authorities moving forward.</p> <p>Spelthorne Borough Council looks forward to continuing its engagement with LB Richmond through its Local Plan process. Officers in the Strategic Planning team are available to discuss any of the comments above should this be useful.</p> <p>Please note that this response is at officer level and as such, Spelthorne Borough Council reserves the right to raise any further issues during the preparation of the LB Richmond Local Plan if Members of the Council wish to do so.</p>
18	Phoebe Juggins, Department for Education	<p>4. DfE notes that significant growth in housing stock is expected in London Borough of Richmond upon Thames ('LBRuT'); the draft London Plan (2019) sets a housing target of at least 811 homes per annum (an increase from the current adopted London Plan target of 315 homes per annum), albeit the London Plan is likely subject to modification prior to adoption and the target has yet to be finalised. This likely growth requirement will place pressure on social infrastructure such as education facilities. The Local Plan will need to be 'positively prepared' to meet the objectively assessed development needs and infrastructure requirements.</p>
19	DP9 Ltd on behalf of London Square Developments	<p>See also comments by respondent in section on the economy.</p>
20	Gary Backler, Friends of the River Crane Environment.	<p>FORCE notes the strength of the commitment that "The new Local Plan must include policies that maximise delivery of new housing." A similar level of commitment should be given to increasing the delivery of green spaces that will match the increases in the residential population that the increased housing will bring. This document is silent on the need to provide open space in step with the provision of increased residential housing. It is also silent on the need to provide space for children in the</p>

Respondent reference no.	Name / Organisation	Detailed comments
		<p>new homes to play healthily and safely. We have already seen large-scale housing developments in the Crane valley with inadequate play facilities. These developments throw the burden of children’s play generated by the new developments onto existing public spaces, which have then become over-used and degraded.</p> <p>Both the quantum and quality of green spaces need to be increased in step with increased housing provision, to avoid increased wear, tear and degradation of existing green spaces, and to support the physical and mental health and wellbeing of the residents which the borough is seeking to accommodate. Moreover, the green spaces need to remain accessible to the public free of charges, in order to be genuinely inclusive and to address “equality impacts” of housing development in the borough (p8).</p> <p>FORCE notes the pressure to increase the height of residential buildings. We are committed to protecting the vista in the Borough’s open spaces: much of the mental health benefit of open space derives from the sense of tranquillity and escape from urban pressures that the open space provides. This tranquillity and escape is compromised by the visual intrusion of structures, including residential housing blocks that are visible from the open spaces, particularly during the winter months of leaf-drop. FORCE also believes that any “view premium” should be a public benefit, available, through the absence of visual intrusion, to all users of the open space, rather than a private benefit accruing to the property developer through the premium pricing of housing units that enjoy open-space or river views.</p> <p>Moreover, many of our open spaces provide “dark spaces” for wildlife, and form links in “dark corridors” which are a crucial element in the well-being and biodiversity of species in the Borough. These dark spaces risk being compromised by lighting and traffic from housing developments adjacent to them.</p> <p>Accordingly, FORCE will oppose any residential increase in the height of residential buildings that would be visible from the Borough’s open spaces, and in particular any residential development that compromised the vista and the darkness of the river corridors and open spaces in the Borough. We would expect the protection for these dark corridors to be a part of the plan.</p>
21	Lucy Wakelin, Transport for London Commercial Development	<p>Please note that our representations below are the views of the Transport for London Commercial Development (TfL CD) planning team in its capacity as a landowner in the borough only and are separate from any representations that may be made by TfL in its statutory role as the strategic transport authority for London. Our colleagues in TfL Spatial Planning have provided a separate response to this consultation in respect of TfL-wide operational and land-use planning / transport policy matters as part of their statutory duties.</p> <p>Delivering new homes and an affordable borough for all</p> <p>TfL CD broadly supports Richmond’s approach towards delivering new and affordable housing across the borough. TfL CD is committed to delivering 50% affordable housing (by habitable room) across its portfolio as instructed by the Mayor and look forward to working with the Council to achieve this on TfL owned sites. We also welcome the Councils acknowledgement of Build to Rent (BtR) as a new and innovative approach to development which can increase capacity and speed up housing delivery. TfL CD has a number of active BtR schemes across London looking to deliver significant residential-led development and we welcome the opportunity to explore the potential for this on TfL owned sites within Richmond.</p>
22	Jimmy Wallace, Richmond Athletic Association	<p>We broadly support the borough’s proposed approach to providing the homes that its residents require. We also welcome the borough’s intention to prepare a Local Plan that will be in accordance with the housing needs for Richmond as outlined in the emerging London Plan and also the acknowledgment of Government’s long term objective to deliver a higher housing target. We support the commitment to undertake a Local Housing Needs Assessment in 2020 / 2021 and the intention to meet a full range of housing needs and ‘to consider opportunities to make efficient use of every piece of land to maximise the delivery of new housing’. A series of policy directions for formulating the emerging housing policies are identified and we broadly support the suggested approach.</p>
27	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond	<p>We note the current London Plan target for the Borough is a minimum of 315 new homes per annum. The new London Plan is held up for adoption by a dispute between the London Mayor and Government on the target for new homes across London. The Borough outcome could be a minimum of 411 or as high as 811 new homes per year.</p> <p>We are not in support of existing Green Belt or MOL being used for new homes but we are not opposed in principle to adaptations or enhancements to existing buildings in parks and MOL.</p>

Respondent reference no.	Name / Organisation	Detailed comments
		<p>We note that Friars Lane Car-park, just off the Green, is identified by the current Local Plan as providing potential for housing. We would wish to comment should any proposal materialise (previous proposals have failed). We would wish to ensure that the Green is not expected to replace the lost car-parking capacity and that better use is made of other existing car-parks in Richmond in this eventuality.</p> <p>We would like to see Richmond car-parks (some under-utilised) reduce parking around the Green.</p> <p>We expect there to be increasing use of Central Richmond for residential use, especially above ground floor retail and other uses. Adaptation though may be difficult given the historic nature of many of the buildings. It may be worthwhile developing specific policies to return buildings to their original all residential use (with careful reference to historic photographs, etc.) especially in the non-core area such as Hill Rise/Richmond Hill where there is photographic evidence of how these buildings once looked as residences before shops were added in the 20th century. We urge there to be evidence prepared to help assess the balance in Central Richmond between residential, retail and office use.</p> <p>The character and heritage of the area concerned is important and we would not wish to see an increase in density of accommodation or any large-size development or increase above the height of existing buildings to provide new homes.</p> <p>We cannot be more precise without evidence of the number of homes needed and their allocation across the Borough.</p> <p>We believe the policies in the current Local Plan cover these issues adequately and if further amplification is required we would suggest that it could be dealt with by subsidiary planning tools.</p>
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	<p>Need to analyse the amount of latent demand better, for example how many houses sharers would prefer to rent one-bedroom flats?</p> <p>The council should be looking to see if some joint developments can be done in the Kingston and Hounslow opportunity areas so that people on the housing register can be accommodated more quickly. NPPF states that neighbouring authorities need to co-operate and met unmet demand if possible.</p> <p>Need to explore 'Discount Market Sales' – where a discount is given against the market rate, and this discount is passed onto all subsequent purchasers. These schemes also result in a more favourable mortgage interest rates compared to shared ownership.</p> <p>The 'gap in the middle' needs to be addressed – currently only the very well off or those on benefits can access secure housing.</p> <p>More alms-houses could be built so that affordable retirement flats are available in perpetuity.</p>
32	Mark Jopling on behalf of UPPFT	See also comments below
34	DP9 Ltd on behalf of Harlequin Football Club Limited	<p>3. Housing Need</p> <p>3.1 The Local Plan Direction of Travel Consultation document identifies housing delivery and meeting the housing targets set out in the London Plan as one the key reasons why a new Local Plan is required.</p> <p>3.2 The Intend to Publish version of the London Plan (December 2019) provided Richmond with a new housing target which was substantially higher than the target set out in the adopted London Plan. The ten-year delivery target for the period from 2019/20 to 2028/29 is 6,440 new homes, which equates to 644 units per annum. The Direction of Travel Consultation document states that 315 new homes per annum will be delivered in the borough between 2015 and 2025, which highlights a major shortfall.</p> <p>3.3 To compound this particular issue, publication of the Local Plan Direction of Travel Consultation has been followed by a letter from the Secretary of State for Housing, Communities and Local Government to the Mayor of London, directing him to make changes to the new draft London Plan before it can be adopted. A relevant extract from the letter states:</p> <p><i>"I had expected you to set the framework for a step change in housing delivery, paving the way for further increases given the next London Plan will need to assess housing need by using the Local Housing Need methodology. This has not materialised, as you have not taken the tough choices necessary to bring enough land into the system to build the homes needed."</i></p> <p>3.4 Taking account of the above, one can expect that housing targets for individual boroughs will further increase in the short term. Through the new local plan process, it is therefore imperative that the Council seeks to promote the consolidation and intensification of large underutilised sites in the borough and targets the least constrained sites for higher density development. It is our strong view that redevelopment of the Harlequin's site and the Twickenham Central Depot site can make a significant contribution to achieving these targets, whilst at the same time easing the pressure on other more sensitive parts of the borough.</p> <p>3.5 As suggested in the Direction of Travel consultation document, we support the undertaking of a borough wide Urban Design Study as a tool to help identify redevelopment opportunity sites and quantify the appropriate scale of development on individual sites.</p>

Respondent reference no.	Name / Organisation	Detailed comments
		[See respondent no. 34 in the Call for Sites Responses Schedule]
38	Justine Langford on behalf of Ham and Petersham Neighbourhood Forum	Housing delivery should follow London Plan Good Growth by Design 'This means new development should benefit everyone who lives here. As such, it should be sensitive to the local context. It should also be environmentally sustainable and physically accessible.' ⁶ This is particularly relevant in Ham and Petersham which has limited accessibility and low PTAL. Reference: ⁶ The Mayor of London (2019) <i>London Plan</i> Available at: https://www.london.gov.uk/what-we-do/regeneration/advice-and-guidance/about-good-growth-design (Accessed 29 March 2020).
40	Jamie Edwards	We don't need more people in the borough. London is overpopulated as it is. Getting on a train at Twickenham or Richmond in rush hour is nearly impossible. Why are we cramming more people into the borough?
41	Anthony Swan	Richmond borough will never be affordable. Reverse Thatcher policy and build / convert more Council houses for rent. Than rents can be selective and affordable. eg Nurses, new School teachers etc get cheap rate.
42	Jeremy Gill	Percentage of affordable homes in your target is too low. Also I do not agree with providing more homes for families. There is a lack of suitable housing for single person households who make up a far large percentage of the households in this country. Of the 27.6 million households in this country, 8 million are single person households. Families by their very nature benefit from the economies of scale inherent in multiple person households.
46 (a)	Joan Gibson	411 new homes a year is not a lot – considering you have Stagg Brewery, Twickenham Town centre and Kneller Hall sites on the books. I do think LBRuT is good at ensuring new housing delivers good room sizes, a good area to live in, with outdoor space and facilities for families. I support your objective of ensuring land is used efficiently and would like it extended to infrastructure i.e. it is much more efficient and environmentally friendly to expand schools rather than build completely new schools. Brown field sites are guaranteed and sports facilities already exist so you are not reducing biodiversity by creating carbon expensive grass mono-cultures for school sports.
47	Trevor Rowntree	I think the borough is over populated as it is and we cannot afford to build any new homes.
48	Roger Wilson on behalf of Roger Wilson Consulting LLP	We should promote walking, public transport and cycling, and stop use of cars and vehicles across the Borough. We should not provide parking spaces for new and renovated housing. We should heavily increase parking charges for residents and businesses.
49	Margaret Edwards	The need for specialist housing for older people, such as extra care has been ignored. Opportunities have been missed e.g. Brewery lane, Lidl developments in East Twick and on Wickes site, all ideal locations and all used for standard homes or shops. So called 'retirement housing' such as one on Twickenham Green have inaccessible bathrooms and no communal facilities. If people under occupying large homes can move to accessible well designed apartments then the former are freed up for families.
50	John O'Brien	Build council houses
52	Winston W Taylor	Broadly agree with the tenor of the document but I am not sure that this section sets out a real policy direction. The answers to the questions posed seem to me to give a policy direction. The paper does not give any direction - except to do what the Mayor of London says re Housing targets
55	Jon Rowles	The housing targets are too high and will result in a lot of inappropriate development.
64	Johanna Eschbach on behalf of Richmond Bridge Residents Association	We support the proposed policy directions. It is important for the borough and East Twickenham to offer a range of housing for a range of household types.. We support retaining 50% affordable target on all developments. Small sites are an essential component but especially important that development respects existing style. One person households should be included in addition to the suggested groups (they represent 29% of total households, and are likely to grow).
66	Robert Philip Cunliffe	Growth plans need to be revised in line with more aggressive climate change models; for both affordability and impact
67	William Mortimer	I regret I am out of time to think any further on these matters before the deadline for submission and they are not an area in which I have expertise. I have focused on the items needing further attention, namely: 1. the use of the river for its historic purpose of moving people and materials safely and reliably 2. the preparations that should be undertaken under local authority to ready every area for disasters of various kinds, e.g flooding, aircraft crashes and dirty bombs (viral or nuclear).

Respondent reference no.	Name / Organisation	Detailed comments
68 (a)	Mark Jopling	CIL payments for C2 and C3 should be same level to stop speculators trying to exploit arbitrary differences to maximise margins and avoid building genuine affordable housing to meet local needs.
What do you think are priorities for the type and size of new dwellings?		
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	The council need to be careful not to just concentrate on the needs of the housing register. Many young adults have problems accessing the housing market because of the low number of starter homes and studios are being built, as developers now favour the demands of buy-to-let landlords. Whilst most single people don't show up on the housing register – and this could result in demand for family housing being more pronounced that it actually is.
28	Alice Shackleton on behalf of The Kew Society	There must be a range of one – three bedroom flats as well as houses, so that young people, families and older residents are part of a mixed community that is alive. The current trend to blocks of small flats risks creating “ghetto” areas appealing to and aimed at younger residents who commute to work and have less involvement in the local community. Green space with the dwellings is a priority.
31	Tim Catchpole on behalf of MESS	We await results of the Housing Needs Assessment Study.
40	Jamie Edwards	no more please!
41	Anthony Swan	If we want families living here then you need more than one bedroom. Council and Housing trusts should concentrate on 1, 2, 3 bed flats to rent...maybe to sharers, The buyers of larger houses can look after themselves.
42	Jeremy Gill	Small homes in houses, not flats. Blocks of flats overload local infrastructure.
44	Roger Cutler	Flats.
45	Sally Beeson	As housing is costly in our borough, families are living in very small flats even though they may have several children - we're going backwards to Victorian overcrowding. I think there should therefore be fewer units built, but larger inside.
46 (a)	Joan Gibson	You have left Social housing building out of your list of building homes. This should be included as lack of social housing, high rents and insecurity around term of rent is making the rental market difficult, and leading to mental health issues and homelessness. This would also help your very low level of affordable housing – 17%. There are too many excuses as to why your affordable housing is so low – this needs to stop. You apparently cannot find sites for the housing, so giving what you have to self-build is surely a bad idea. I like your ideas of exploring modern pre-fab buildings.
47	Trevor Rowntree	No new dwellings.
48	Roger Wilson on behalf of Roger Wilson Consulting LLP	Promote walking, public transport and cycling. Stop use of cars and vehicles across the Borough.
49	Margaret Edwards	See above re extra care housing. Plus all new homes should be fully accessible, meeting at least M4 (2) with 40% meeting M4 (3) Building Regs.
51	Su Bonfanti	It is important for the borough and East Twickenham to offer a range of housing for a range of household types. Strongly support retaining 50% affordable target on all developments. Where I live in East Twickenham, the only site are small sites in already densely built areas. For neighbours to welcome such developments, it's especially important that they respects the existing scale and style. That need not prevent modern interpretations but they must be in the right place. Recently there was a proposal - rightly in my view rejected - to build a two bedroomed house with underground living area at the end of Alexandra Road. The idea was innovative and could work - in the right place. But the land currently occupied by two garages and a bit of parking in a network of late Victorian/Edwardian redbrick terraces is not the right place.
52	Winston W Taylor	I dont think anybody really knows the answer. The survey of Housing need is a major priority. I have a feeling that there is a need for 3/4 bed family houses as the developments in recent years seem to have been mainly of flats for singles and childless couples.
62	Richard Woolf on behalf of McDaniel Woolf Architects	Acknowledge that larger scale dwelling have always been a part of Richmonds history, as well as smaller more typical dwellings.
55	Jon Rowles	These seem to be based upon the housing register and not the broader needs of the entire population of the borough

Respondent reference no.	Name / Organisation	Detailed comments
56	Rob Kennedy, Environment Agency	2-3 bedroom flats and houses.
60	Kingsley Izundu, The Royal Borough of Kingston upon Thames	The priorities for the type and size of new dwellings are genuinely affordable family homes for rent and homeownership for working residents on low to middle income.
63	Carol Rawlings	No additional dwellings required as have already met the target. Any new ones should be social housing only, as there is a severe shortage. No new luxury dwellings of any size should be allowed.
64	Johanna Eschbach on behalf of Richmond Bridge Residents Association	This should be guided by facts and growing trends.
66	Robert Philip Cunliffe	Zero carbon footprint
68 (a)	Mark Jopling	Be strict with the tenure mix of affordable housing. Some developers driven by exploiting the different definitions of affordable housing and relying on Councils having a lack of resourcing for enforcement. Council must also have stricter enforcement of Planning Conditions and s106 agreements.
68 (b)	Mark Jopling	Proper tenure mix of affordable housing. Eliminate difference in CIL for C2 and C3 to stop speculators being incentivised to pretend to deliver a certain type of housing for which demand is limited. Greater enforcement of s106 and Planning Conditions so the community gets guaranteed delivery of what is committed in Planning Applications
Could other forms of housing assist with meeting local needs?		
Of respondents who answered the question: 12 said yes, 3 said no and 6 said don't know [17 did not answer the question]		
28	Alice Shackleton on behalf of The Kew Society	A relatively recent form of housing, co-working, is an imaginative concept that provides bedrooms for young adults to rent, having communal work/living space and garden space. That could provide affordable, well-designed living in the borough where such residents might struggle to buy. It could give them a transition time between, say, college, establishing their work and perhaps buying a property, thus fulfilling a need for somewhere affordable for people to live in this expensive borough.
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	If there were more student halls of residents built – it would free up many flats and houses the students now occupy. Need to give consideration of the needs of homeless people – we have very limited supported housing for homeless people. Maybe a need for accommodation on the YMCA hostel model to reduce the large sums paid for emergency bed and breakfast accommodation – as suggested in the 2012 DTZ Evidence Base for Tenancy Strategy (paragraph 127 and 140) https://www.richmond.gov.uk/media/11322/dtz_full_report.pdf The alms-houses model would mean we have a permanent supply of assisted housing for older people. It would also encourage more people to downsize which would free up more family sized units.
31	Tim Catchpole on behalf of MESS	We await results of the Housing Needs Assessment Study.
41	Anthony Swan	Council houses and to rent properties.
45	Sally Beeson	Empty shops or unused buildings near to the town centres.
46 (a)	Joan Gibson	Social Housing
49	Margaret Edwards	Home sharing between people with support needs and people with housing needs, land allocated for intergenerational housing with space , support for co-housing schemes - be a pioneering borough as only one other in whole of London.
50	John O'Brien	Council houses
52	Winston W Taylor	See 27.

Respondent reference no.	Name / Organisation	Detailed comments
62	Richard Woolf on behalf of McDaniel Woolf Architects	Higher density dwellings new transportations hubs.
55	Jon Rowles	<ul style="list-style-type: none"> - More student housing - in the form of halls of residence - could free up a lot of houses and flats in the borough. - Might be a need for supported housing for homeless people, young people having to move out of abusive homes. In the form of a YMCA hostel etc - more starter home being built rather than two double bedroom flats targeted at buy-2-let landlords. - Need to explore 'Discount Market Sales' – where a discount is given against the market rate, and this discount is passed onto all subsequent purchasers. These schemes also result in more favourable mortgage interest rates compared to shared ownership. -The 'gap in the middle' needs to be addressed – currently only the very well off or those on benefits can access secure housing.
60	Kingsley Izundu, The Royal Borough of Kingston upon Thames	Community-led housing and self- and custom-build. Offsite manufactured homes can also contribute to meeting local needs.
63	Carol Rawlings	Social housing; shared housing.
64	Johanna Eschbach on behalf of Richmond Bridge Residents Association	If new developments are not possible, areas to consider would be residential areas on main roads. Because of the high level of disturbance on these roads, these don't currently make the best permanent homes. However since there's an objective to reduce environmental pollution, these could be a future opportunity. Because of online shops, shops on high streets are becoming empty. If there's a clear policy to keep a minimum of quality shops, the empty sites could become residential.
Would you support housing delivery from small sites, if it is of good design and contributes to local infrastructure?		
Of respondents who answered the question: 19 said yes, 4 said no and 2 don't know [13 did not answer the question]		
28	Alice Shackleton on behalf of The Kew Society	Yes, as long as tall buildings are not sited on such small sites – there should be a maximum limit on height and density.
What other ways could help deliver more affordable housing, in the right locations, given land values and property prices in the borough, and recognise the wider community benefits it brings?		
14	Mayor of London	<p>Affordable Housing</p> <p>The Mayor welcomes Richmond's intention to seek 50% affordable housing from residential development. However, the Mayor has set out a Threshold Approach to affordable housing delivery in Policy H5 of the Intend to Publish London Plan and this should be reflected in Richmond's emerging Local Plan. The Threshold Approach seeks to limit those circumstances where viability evidence is required as part of residential planning proposals by providing the incentive for developers to achieve at least the minimum level of affordable housing to qualify for the Fast Track Route thereby avoiding scrutiny of viability at various stages of development. The Regulation 18 version of the Local Plan should be drafted in line with this approach.</p> <p>It is noted that the Inspector for Richmond's adopted Local Plan found that Richmond's Whole Plan Viability Assessment identified the potential for some sites in Richmond to realise proportions of affordable housing approaching 50%. Therefore, should Richmond wish to set a threshold higher than 35%, this should be evidenced through its viability evidence, including how the threshold will incentivise housing and affordable housing delivery.</p>
17	Hannah Bridges, Spelthorne Borough Council	Given the lack of affordability within the area affordable housing provision should be prioritised within the new Plan. The Local Plan should distinguish between brownfield and greenfield sites in determining its affordable housing provision given that greenfield land generally has lower associated development costs.
19	DP9 Ltd on behalf of London Square Developments	<p>Affordable housing – p. 20</p> <p>The Direction of Travel document acknowledges a shortfall in delivery of affordable housing. Richmond will need to consider further opportunities, including the Site, to deliver affordable housing. The Greggs application seeks to maximise the affordable housing provision and it is proposed to deliver circa 57 units as affordable</p>

Respondent reference no.	Name / Organisation	Detailed comments
		(49% of total units) on site. The former Greggs Bakery Site offers a unique opportunity to deliver a high proportion of affordable units on site including a mix of unit sizes and family homes.
22	Jimmy Wallace, Richmond Athletic Association	<p>The borough's initial assessment of its affordable housing requirements and the suggested policy directions to address these are acknowledged and broadly supported. However, in the spirit of positive planning as outlined in the overall approach to preparing the Local Plan, we do think that the borough should be seeking to develop policies that are taking a transparent and robust approach to <i>understanding</i> as opposed to <i>challenging</i> viability evidence to maximise delivery. In this regard, there is a requirement for the borough work collaboratively with all partners including the Mayor of London, housing associations, developers etc. to work towards delivering the best affordable housing outcomes in the context of a robust but pragmatic discussion around the overall viability of development projects and the many competing interests.</p> <p>In this regard, there may be cases (albeit rare) where a particular development is required to prioritise the delivery of other forms of social infrastructure (e.g. enhanced sports and community facilities) over-achieving the target percentage of affordable housing as identified in policy. Taking a pragmatic approach to such forms of development is likely to deliver the optimum outcome for the borough in terms of the delivery of both affordable housing and other forms of vital social and community infrastructure.</p>
27	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond	We recognise the need for affordable housing in the community given the high property-values and need to have an inclusive community. We encourage key worker accommodation and consideration being given to provision for police accommodation in Richmond given the need for policing of the evening economy and healthcare worker accommodation on account of a relatively high proportion of elderly residents in the area.
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	<p>There are models where the discount is maintained in perpetuity; discount Market dales, restriction on staircasing etc. Adopting these methods would see more recycling of affordable housing.</p> <p>Richmond Housing Partnerships (RHP) own a lot of blocks of flats built in the garden city style with pitches roofs. Though most of the flats have been sold on freehold, the roof spaces will still belong to RHP and could be converted into flats. The land by the side of the blocks of flats is likely to be under their control too – and there may be room room to build units there too.</p> <p>Some of the older London County Council style blocks of flats could have their roof space converted into new units. Such developments are common in the private sector and the council need to check to see if RHP still own these roof spaces.</p> <p>[See photo in Appendix]</p> <p>The council could also take a radical approach and start building new council housing directly or set up their own property company. Councils that have previous transferred their housing stock can set up a new Housing Revenue Account and this is easier now that Theresa May's Government abolished the debt cap. See https://www.socialhousing.co.uk/comment/comment/reopening-the-housing-revenue-account--is-it-actually-an-option-63624</p>
28	Alice Shackleton on behalf of The Kew Society	See answer to question above in relation to co-working.
31	Tim Catchpole on behalf of MESS	More priority should be given to affordable housing than to payment of CIL.
40	Jamie Edwards	What benefits? I only see problems with Parking. Overcrowding of swimming pools. Trains etc.
41	Anthony Swan	Renting by Council as above.
42	Jeremy Gill	Compulsory purchasing of properties empty for two years or more.
44	Roger Cutler	Better planning & consideration for surrounding residents.
46 (a)	Joan Gibson	Sites can be rebuilt to provide more efficient use – especially council owned sites. i.e. rebuild Whitton Community centre which is old and inefficient and have flats above it. Fixes the carbon footprint of the community centre whilst giving you some houses with access to infrastructure, green land and good transport links. Rebuild nursery on Whitton Corner in the same manner. Build flats over Sainsbury St. Clares, Homebase and McDonalds (both shops and carparks – carparks can be underground), build flats over Tesco Rugby Road (both shop and carpark), you can do the same with business parks The list is endless.
52	Winston W Taylor	I am not an expert on housing finance. I would need to talk to one to answer this

Respondent reference no.	Name / Organisation	Detailed comments
53	Richard Woolf on behalf of McDaniel Woolf Architects	Get Richmond Housing Partnership to review land use, intensification and replacement over a 10 year strategy.
55	Jon Rowles	If you managed to get the government to change the Broad Market Rent Areas - people on housing benefit may be able to access more housing options. There is also this toolkit from the Community Led Homes which has a variety of measures the council can take, including restricting 'staircasing' so the housing association can buy back more housing. http://clhtoolkit.org/housing/how-ensure-community-led-housing-schemes-are-genuinely-affordable-and-remain-so-perpetuity
56	Rob Kennedy, Environment Agency	The use of brown field sites for new housing.
60	Kingsley Izundu, The Royal Borough of Kingston upon Thames	Making efficient use of land whilst it is awaiting long-term development for meanwhile housing.
63	Carol Rawlings	Prefabricated building is cheap, quick to build, and can be carbon neutral. This is the commonest form of private housing in Japan.
General comments relating to this topic area		
32	Mark Jopling on behalf of UPPFT	The Trust makes the following comments on the "Direction of Travel": Eliminate delta in CIL between C2 and C3 to prevent developers being incentivized to deliver profit maximising tenures not based on social need.
Shaping and supporting our town and local centres as they adapt to changes in the way we shop		
Do you agree with the proposed policy directions?		
Of respondents who answered the question: 15 said yes, 3 said no and 5 don't know [15 did not answer the question]		
29	Richmond Cycling Campaign	P22-27 local town centres We want to support local town centres and all the things people choose to do there. However, they're invariably places of high pollution (like Richmond's George St.), and of high perceived danger for those walking and cycling. However, we think any long term vision for the borough needs to put people back into the town centres, and cars at the periphery. None of our town centres should be a place to 'drive through', nor should their space be so dominated by provision for motor vehicles. We think successful town centres are pedestrianised where at all possible, and they support frequent, smaller shopping journeys - and the borough, as part of this strategy, should be discouraging or closing 'out-of-town' style shopping centres built around large car parks.
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	The council needs to recognise the value of storage to retailers as it cuts down on frequent deliveries and enables the unit to appeal to a broader range of tenants. There is a value in units remaining as large as possible as hiving off parts for housing at the rear reduces the flexibility of the building and means it appeals to fewer potential tenants. Service yards are important too – those in good condition attract good tenants and enable efficient deliveries. When they are blocked by parked cars, or the service areas built over, deliveries then have to be made by from the main road and these result in extra delivery costs. If the they become squalid – with rubbish not bins not managed properly etc they can put off new tenants and this can affect the viability of town centres.
31	Tim Catchpole on behalf of MESS	Yes, but there is no mention of retail parks.
38	Justine Langford on behalf of Ham and Petersham Neighbourhood Forum	HPNF support the strategic aim to develop a self-sustaining borough where shops, services and employment are available locally and the contribution that this makes to community cohesion and reduction in travel. This aligns with Ham and Petersham Neighbourhood Plan (HPNP)2 objectives for Travel and Streets (section 4.1), Community Facilities (Section 5.1), Retail and Local Services (Section 6.1) and the Opportunities for Change section for Ham Parade (Policy O1) and St Richard's Square (Policy O2). This approach, also described as the '20 minute neighbourhood' is being developed and implemented by Melbourne city planning departments, Victoria, Australia ³ and is also in the latest Sustrans Manifesto ⁴ .

Respondent reference no.	Name / Organisation	Detailed comments
		<p>'Adapt to changes' suggests a reactive approach to change which could be complimented by a more proactive approach which aligns with the '20 minute neighbourhood'.</p> <ul style="list-style-type: none"> • Policy for neighbourhood centres should consider the use of local development orders relaxing use class controls so as to allow any street level use which includes an active frontage and does not involve conflict (following "Bad Neighbour" definition) • Policy for local/neighbourhood centres should encourage the upgrade of the pedestrian environment to include landscape, surfaces, access, cycle parking etc., in line with Healthy Streets objectives, as documented in HPNP proposals for Ham Parade and St Richards Square in the Opportunities for Change section for Ham Parade (Policy O1) and St Richard's Square (Policy O2). • Other thoughts include: <ul style="list-style-type: none"> ○ Support for local centres and local traders with a shared management support and accountancy, website design / graphic design package. ○ Supporting community shops / markets with zero rates and access to funding ○ Provision of (franchised?) delivery cargo bike scheme for local shops to residents ○ Improvement of infrastructure for sustainable transport to reach shopping areas. <p>References: ³ London Borough of Richmond upon Thames Climate Change and Sustainability Strategy (2019) Available at: https://www.richmond.gov.uk/media/17738/climate_change_and_sustainability_strategy_2019_2024.pdf (Accessed: 29 March 2020). ⁴ Victoria State Government (2020) 20-minute neighbourhoods. Available at: https://www.planning.vic.gov.au/policy-and-strategy/planning-for-melbourne/plan-melbourne/20-minute-neighbourhoods (Accessed: 29 March 2020)</p>
41	Anthony Swan	What is the Policy? Shaping and Supporting are just words without any proposed actions. Too many shops are charity outlets so should not count as commercial premises.
42	Jeremy Gill	Your policy does not appear to have any direction. The above document, as with most of what you present here is unreadable and meaningless. It conveys almost no tangible information about the subject it purports to cover.
44	Roger Cutler	Vacancy levels are still too high.
46 (a)	Joan Gibson	Agree with most of this – however would like to see business premises at the bottom of flats considered. i.e. Powdermill Lane new development has retail units at the bottom, but these shops are not used that much and ownership changes frequently. It would be better if it was business space attracting jobs into the area.
48	Roger Wilson on behalf of Roger Wilson Consulting LLP	We should promote walking, public transport and cycling, and stop use of cars and vehicles across the Borough.
52	Winston W Taylor	Broadly yes but..... I am sure it will be dealt with below
63	Carol Rawlings	I can't read the policy direction. Where is it? There is no link that I can use. Whatever the current direction may be, it needs to be on hold until the full effects of the current virus lockdown can be evaluated.
64	Johanna Eschbach on behalf of Richmond Bridge Residents Association	We think the hierarchy of centres is still useful and that think East Twickenham is correctly classed as a local centre, i.e. not suitable for the biggest stores or for the night-time economy, but intended to provide for largely local needs, including through specialist shops. We don't want to lose retail space, but we support flexibility of use to allow businesses to change how they work and to allow businesses to share space if they think their offerings are compatible. Similarly, it would be good to have more flexibility around conversion to housing. We would like to retain the feeling of a local centre but equally we don't want a permanent array of vacant shops. One approach would be for certain locations to be amenable to conversion eg at the ends of the run of shop frontage in East Twickenham, on the corner of Rosslyn Road or under Poplar Court, where the loss of retail would not change the character of the local centre.
66	Robert Philip Cunliffe	THIS REALLY NEEDS TO BE REWORKED WITH THE IMPACTS of COVID-19, as well as the now dramatic move away from the concept of a "shopping - based" view of urban centres, and the significant shift to web based delivery of good and services. A new model will suggest new business opportunities, in a sustainable way.
68 (a)	Mark Jopling	Per earlier answers - redevelop Big Box parks and space over transport hubs Protect our village High Streets
Do you agree with the spatial strategy proposed?		
Of respondents who answered the question: 12 said yes, 5 said no and 5 don't know		

Respondent reference no.	Name / Organisation	Detailed comments
[16 did not answer the question]		
22	Jimmy Wallace, Richmond Athletic Association	We support the borough's broad approach to its town centre and retail policies. We support the potential policy direction that would encourage more housing in centres to help meet housing need. However, we think that it should also be recognised that additional housing should also be supported in the residential hinterland locations that surround the borough's town centres such as Richmond. This would not alone increase housing supply but will also potentially continue to encourage further vitality on the edges of town centres where a growing residential population will require greater access to retail and other town centre uses.
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	The problem with the centre hierarchy is that Whitton and Teddington are closer to being small towns, whilst Twickenham and Richmond are larger almost touching metropolitan centres. It would be very difficult for Whitton to accommodate major development – other than the Telephone Exchange site that is unlikely to come to market. Catchment areas for each centre should be defined, as they don't necessarily follow ward boundaries (i.e. a large part of West Twickenham is part of St Augustine's Whitton Parish – and many residents there shop in Whitton and commute from Whitton Station).
28	Alice Shackleton on behalf of The Kew Society	Major developments of retail space should be located in Richmond and Twickenham rather than spread out amongst other centres. This allows a mix of size of development appropriate to each centre, including, of course, other shopping centres as presently designated.
31	Tim Catchpole on behalf of MESS	As above. Yes, but again there is no mention of retail parks.
39	Solomon Green	If traffic is to be reduced or kept to present levels it is desirable that major developments be spread more evenly.
40	Jamie Edwards	LOL. We don't need more retail floor space. Have you actually walked down Twickenham High street recently. Empty units and charity shops! Why on earth in a digital economy are you suggesting more retail space? Bonkers.
41	Anthony Swan	Developments or any sort should be encouraged anywhere an entrepreneur wants to be situated. eg if an office needs parking space then provide it as best possible. Major developments have already gone to Kingston. Richmond, Twickenham (apart Waitrose) and Teddington are the bars and coffee shop areas of the Borough. Encourage the river side with hire boats. Don't Tax new startups or existing businesses too heavily. Make parking available where possible. Encourage near stations.
42	Jeremy Gill	Obviously.....
44	Roger Cutler	Should be spread equally.
45	Sally Beeson	I think Twickenham has more space to play with, but as precedence has now been given to a high rise building at the station, I am worried that more could be built. Where I live in Teddington, I can't see where more development can come. Elleray Hall has already been designated a prime site.
46 (a)	Joan Gibson	You are providing too much retail space in general - retail is reducing. The space should be used for small flexible business, and community instead. Major development should be spread around all areas.
49	Margaret Edwards	All five town centres need good range of shops and services. Im not sure how sustainable this is as I note that Twickenham and Richmond have more empty shops in recent years and quite a few businesses that do not survive. Twickenham seems able to support thriving small shops - fruit/veg, bakers, butchers alongside Waitrose but large low cost supermarkets would be a threat to this.
52	Winston W Taylor	Teddington has plenty of retail floorspace. Not sure about the other town centres but the further work proposed should establish this. Dont think Twickenham needs any more retail floorspace - subject to the proposed riverside development - which could change everything
55	Jon Rowles	The majority of new floorspace should be directed towards Twickenham and Richmond as these are closer to metropolitan centres than any of the others. There would also be a benefit from these two towns having more floor space - in that more services/retail would be offered locally resulting in fewer trips to neighbouring Kingston or Hounslow.
60	Kingsley Izundu, The Royal Borough of Kingston upon Thames	Major development should not be encouraged equally amongst the five town centres. Rather the location of major development should take account of the role and position of the town centre in the town centre hierarchy network.
61	Tom Minns	Focus on Major centres
63	Carol Rawlings	I can't read the strategy as I have no link to it. Why am I being asked questions about things I cannot read about? Major developments must be kept on hold until the effects of the current crisis are fully known. It is absurd to propose a plan at this stage.

Respondent reference no.	Name / Organisation	Detailed comments
66	Robert Philip Cunliffe	see response to q32
<p>Does the existing hierarchy categorise borough centres correctly? Are there too many local centres and parades in this defined centre hierarchy? Local centres, neighbourhood centres and parades are relatively well spread across the borough. However, should we reduce the number of centres in the hierarchy, and/or reduce the amount of/or completely remove designated frontages in some, taking into account their role in meeting local need?</p>		
<p>Of respondents who answered the question: 14 said yes, 7 said no and 3 don't know [14 did not answer the question]</p>		
14	Mayor of London	Richmond's strategic approach to its town centres should take account of the town centre network guidance set out in Table A1.1 of the Intend to Publish London Plan which establishes individual centres' night-time economy classifications, commercial growth potential, residential growth potential and office guidelines classifications. In this regard, Twickenham and Teddington are identified as having important areas of night time economy which are of local significance and Richmond is a more substantial area of regional or sub-regional significance. This should be reflected in the approach taken in the forthcoming Local Plan.
27	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond	Fundamentally, we do not disagree with the London Plan's heirarchy of town centres.
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	We do not support changing the approach. We feel, however, that the council should produce a deficiency map, so that when sites come up for redevelopment, there is more leverage to insist that new facilities are provided.
28	Alice Shackleton on behalf of The Kew Society	<i>[Are there too many local centres and parades in this defined centre hierarchy? Local centres, neighbourhood centres and parades are relatively well spread across the borough. However, should we reduce the number of centres in the hierarchy, and/or reduce the amount of/or completely remove designated frontages in some, taking into account their role in meeting local need?]</i> No. The existing hierarchy provides protective measures for the smaller but locally useful areas.
31	Tim Catchpole on behalf of MESS	As above . Yes, but again there is no mention of retail parks.
41	Anthony Swan	If a business wants to trade then let it. It will only succeed if there is the demand. Pop up shops/businesses has already been mentioned and should be encouraged. Reducing centres means moving businesses on. Larger developments like Lidl should be encouraged because they are in the right place. Because there is a big enough footprint and useful parking. Morrisons tried in Teddington, failed, and moved on. Let economics answer the above questions so long as any development is appropriate for its area.
42	Jeremy Gill	Utterly meaningless. A disgraceful document.
44	Roger Cutler	Too many road closures as the result of parades & fairs.
45	Sally Beeson	If a parade of shops is in decline, then maybe its use could be changed to accommodate new building of fewer shops and flats
46 (a)	Joan Gibson	No change needed
47	Trevor Rowntree	I think the local centres are very important. I live near a local centre and feel very under catered for. More should be done to encourage the growth of local centres rather than town centres.
49	Margaret Edwards	Having lived in St Margarets and Kew I believe there is value in trying to sustain local parades to reduce the need to travel for everyday shopping. In Strawberry hill the parade is limited but has some useful stores/food outlets.
51	Su Bonfanti	I think the hierarchy of centres is still useful and that East Twickenham is correctly classed as a local centre, i.e. not suitable for the biggest stores or for the night-time economy, but intended to provide for largely local needs, including through specialist shops. Generally I think people here don't want to lose retail space, but I agree there should be flexibility of use to allow businesses to change how they work and to allow businesses to share space if they think their offerings are compatible. Similarly, it would be good to have more flexibility around conversion to housing. The question is how to retain the feeling of a local centre without ending up with a

Respondent reference no.	Name / Organisation	Detailed comments
		permanent array of vacant shops. One approach would be for certain locations to be amenable to conversion eg at the ends of the run of shop frontage in East Twickenham, on the corner of Rosslyn Road or under Poplar Court, where the loss of retail would not change the character of the local centre.
52	Winston W Taylor	Not sure. Again the further work may inform this.
55	Jon Rowles	If the council are not careful, we will only be left with coffee shops, nail bars and takeaways. In smaller town centres like Whitton we may need more areas designated as key retail, as it's not just about percentages but absolute numbers too.
60	Kingsley Izundu, The Royal Borough of Kingston upon Thames	As your local centres, neighbourhood centres and parades are relatively well spread across the borough they are significant in contributing to the borough's achievement of both sustainable development and reduction in carbon emission given that they enable local communities to access shopping facilities mostly by walking, cycling or public transport.
63	Carol Rawlings	The local parade in Ham Street was identified for improvement 24 years ago when I first moved into the borough but nothing has been done about it. At present it is an eyesore and there are retail spaces that have been unoccupied for years. This is a parade that needs redeveloping with a reduced number of shops.
66	Robert Philip Cunliffe	TAKE THIS OPPORTUNITY to have a radical rethink to come up with a minimum impact sustainable strategy
68 (a)	Mark Jopling	Each community should nurture its own High Street and local traders.
69	Geoff Bond on behalf of Ham and Petersham Association	You seem to have forgotten that Ham Parade is a critical centre. Ashburnham road is also important. Without these flourishing more car journeys will be made and the local community with diminish in cohesion and wellness.
If the evidence supports a more flexible approach to retail policies, what other uses should be encouraged? - Please give us your comments here:		
7	Michael P Martin, Milestone Commercial	Can I suggest a meeting with local commercial property specialists to discuss the evolution of the High Streets and the protections therein sought by the local plan. The commercial property agents are on the coalface of keeping the local parades busy against overwhelming market conditions and we feel it best to work in partnership with LBRUT to expand the knowledge base, in both directions, as the parades move ever further away from sustainability as traditional retail.
14	Mayor of London	Much of Richmond's intended approach towards the borough's commercial centres and hubs is based on traditional ways of managing town centre development. Richmond should take into account the changing nature of retailing and consumer behaviour. There has been a general decline in retailing across London with high street operators losing market share to online traders. The impacts of these changes have been considerable and many high-street operators are re-establishing themselves through new business models. To maintain vibrancy in London's town centres, the wide range of town centre uses identified in Intend to Publish London Plan SD6 should be considered acceptable in Richmond's town centres including office development, residential, social infrastructure, cultural uses and leisure uses.
27	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond	We cannot be precise about our views on the balance of uses in Central Richmond without the evidence the Council says it will be preparing. It seems highly probable that the current corona virus epidemic will have a major impact on retail, casual dining and the evening economy. Retail has been under stress for several years due to internet shopping and high rates and rents. The leisure sector has been increasingly under stress due to Equity Capital investors taking over of restaurant-chains and funding this with high levels of debt, discounting of meals, rising rents and staffing costs, thin profit margins and over capacity. Many already weak retail and leisure businesses will not survive. This raises major issues about commercial uses in Central Richmond in the future and the rate of economic recovery. Increasingly people may work from home or remotely and office use may decline. As discussed in the theme 'Protecting what is special', Richmond may best be served by focussing on its cultural and heritage assets including the Riverside and the Green. The Richmond Theatre and Orange Tree Theatre are already valuable assets. Perhaps increased provision for the visual arts and performing arts in conjunction with education in the arts could be a viable focus going forward. We are not in favour of relaxing the approach to retail planning policies and reducing the importance of the shopping-frontage policies, especially in George Street. We are not in favour of introducing large-footplate retail in Central Richmond. For example, major retail development at Richmond Station in our view is not acceptable and would put at risk the viability and vitality of existing retail activity in Central Richmond. We believe it essential that cumulative impact constraints should remain in both planning and licensing policy so as to avoid any increase in the anti-social behaviour, public nuisance and crime and disorder arising from alcohol consumption in Central Richmond, on the Riverside and on the Green.

Respondent reference no.	Name / Organisation	Detailed comments
		<p>We are most concerned at the prospect of any relaxation in the uses-classes, whereby planning control over restaurant and bar capacity is weakened. We are concerned at the possibility of permitted development rights being extended to the change-of-use of existing retail premises. We believe the marketing rule may become largely redundant but there should still be control over the future uses of Central Richmond.</p> <p>When making applications it is important that the applicant identifies all buildings within reasonably close proximity that are Listed or Buildings of Townscape Merit and the applicant should explain how the proposed development will not be detrimental to these buildings in respect of noise, pollution, etc.</p> <p>We continue to be concerned with the need for the Council to control noise from patrons of premises in the heart of Richmond, especially during the evening economy.</p> <p>We continue to be concerned with the need for the Council to control noise from extractors and other M+E plant supporting commercial premises in proximity to residential properties.</p> <p>We continue to be concerned with the need for the Council to control fumes and cooking-smells from commercial premises in proximity to residential properties. It is unclear how the Internet will effect retail activity in Richmond long-term, but clearly the changing market will need to be monitored and projections will need to be included in decision-making.</p> <p>We believe the policies in the current Local Plan cover these issues adequately and if further amplification is required we would suggest that it could be dealt with by subsidiary planning tools. We are concerned that the Direction of Travel document seems to suggest relaxation of existing controls that are essential to maintaining the health of Richmond.</p>
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	Cultural and social uses such as art galleries, performance spaces and permanent market pitches.
28	Alice Shackleton on behalf of The Kew Society	As retail shopping switches increasingly to online shopping (this may become even more prevalent after the Coronavirus experience) it would be beneficial and, we think, welcomed by residents, for service uses such as physiotherapy, osteopaths, spas, beauty shops and would keep the area as a living area visited by residents. It seems inevitable that high street retail shopping will go through an even more severe decline – better to replace shops with service uses, than turn them into residences where the community use will be lost.
31	Tim Catchpole on behalf of MESS	Discourage retail park development as it generates too much traffic.
39	Solomon Green	There should be flexibility between office and residential use granted in town centres but not in predominantly residential areas. While, at present, it pays landlords to switch from office to residential, it was within the last forty years that the Council were anxious to resist a demand from landlords to switch the other way.
40	Jamie Edwards	Community centres. Youth clubs. New Libraries. Health and well being businesses / Gyms
41	Anthony Swan	Which would we prefer in Twickenham... Poundland or a shared workspace café? One is tat the other is a nursery for self starters, micro businesses, clubs and business communication. So Yes to scope for community centres. Office business rates and rents should be more flexible and accommodating. Areas should exist for retaining offices but make them affordable. Cafes are fine as is late opening but a night time economy is not. Even Magaluf is being more responsible and the majority of Families living in the area would not want that distraction.
42	Jeremy Gill	Again, meaningless waste of people's time even to read this, let alone write it.
44	Roger Cutler	Too many cafes. More re4tail required.
45	Sally Beeson	I think that there are too many coffee shops/cafes in my area and that local offices and businesses are important, as they bring trade into the small shops which are struggling and into the local economy. If there is no local business then an area just becomes stagnant - we need shops, businesses and housing to make a thriving and forward looking local area - all of these things

Respondent reference no.	Name / Organisation	Detailed comments
46 (a)	Joan Gibson	We should continue providing protection for post office – and add in small shared bank premises (or something of the sort). You should pedestrianise the main town centres as this makes them more attractive and increases footfall.
52	Winston W Taylor	Community use - The Elleray Hall proposals are important here - but this is just off the main Teddington shopping centre. I think Teddington has sufficient cafes and restaurants.
53	Richard Woolf on behalf of McDaniel Woolf Architects	An honest review of decommissioned and redundant retail sites. Both high street and larger shed sites.
55	Jon Rowles	Quite a number of key shopping frontage units have been lost to non-retail. I would argue that you need to check the numbers lost since the last plan and 'top' up the number with new designations.
56	Rob Kennedy, Environment Agency	café culture and drinking establishments
58	Michael Atkins, Port of London Authority	The PLA's Vision for the Tidal Thames (The Thames Vision) (2016) includes the goal to see more people people coming to enjoy the Thames and its banks. As such the PLA would broadly support instances
60	Kingsley Izundu, The Royal Borough of Kingston upon Thames	All uses which can co-locate and uses which meet community needs.
63	Carol Rawlings	Reinstatement of the local police station in Ham.
66	Robert Philip Cunliffe	INSIST that "true" dwelling space provisions MUST be applied to concessions from old "re-purposed" office space - otherwise this is storing up even more problems for the next generation
68 (a)	Mark Jopling	Flexible office space is the future, CV-19 taught many jobs can be done productively from home or at least without travelling to central London
68 (b)	Mark Jopling	Get ahead of the decline Big Box retail and encourage our local High Streets. Richmond can be a model Borough, we have many advantages to be progressive.
70	Melissa Compton-Edwards	Post Covid-19, businesses and employees may take a more favourable view of home- working, which would be beneficial for the environment, resulting in less road congestion and air pollution. However, not everyone lives somewhere suitable for home working, and people can feel socially isolated working from home, so it would be desirable if residents' local high street offered drop-in or bookable communal work hubs with cafe facilities.
Would housing, including residential on upper floors, work if located next to other (potentially noisy or smelly) uses in centres work? Where might a relaxed policy to encourage more housing apply? Should it, for example, apply in designated frontages?		
22	Jimmy Wallace, Richmond Athletic Association	See comments above.
27	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond	<i>Comments as above re using upper floors for housing:</i> We expect there to be increasing use of Central Richmond for residential use, especially above ground floor retail and other uses. Adaptation though may be difficult given the historic nature of many of the buildings. It may be worthwhile developing specific policies to return buildings to their original all residential use (with careful reference to historic photographs, etc.) especially in the non-core area such as Hill Rise/Richmond Hill where there is photographic evidence of how these buildings once looked as residences before shops were added in the 20th century. We urge there to be evidence prepared to help assess the balance in Central Richmond between residential, retail and office use. See comments on controlling smells and noises above.
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	Agent of change principle is the issue here. New developments should lead to bars and clubs being forced to close – unless the noise they are making is already unreasonable / illegal. This could have a negative cultural impact.

Respondent reference no.	Name / Organisation	Detailed comments
31	Tim Catchpole on behalf of MESS	Yes, there could be more housing (apartments) in our town centres.
39	Solomon Green	Yes. Especially if it is aimed at single occupants.
40	Jamie Edwards	NO MORE PEOPLE NEEDED! It just creates even more pressure on failing infrastructure.
41	Anthony Swan	Housing would work anywhere depending on the rent etc costs. I would not want housing on designated frontages unless most of that frontage is failing.
42	Jeremy Gill	Housing in houses, offices in office buildings. It's not Shoreditch.
44	Roger Cutler	There should be a more relaxed policy on housing. Developers need to take more responsibility for what they sell.
45	Sally Beeson	Yes a good idea
46 (a)	Joan Gibson	Not sure fully what you are asking here, but flats should be above businesses as this is efficient land use and noise or smells dealt with in the design of the build.
49	Margaret Edwards	People do need to be able to open windows for ventilation so double glazing etc only works in Winter to block out noise (unless you have air conditioning and this is not sustainable) People might exchange some noise for handy location especially if there is access to green space close by - Richmond Green for example.
52	Winston W Taylor	Depends on the further work being done. In principle I have no objection.
53	Richard Woolf on behalf of McDaniel Woolf Architects	With over 50% of space above retail sites vacant, it's more an issue of fire engineering and acoustic segregation.
55	Jon Rowles	Agent of change principle is the issue here. New developments should lead to bars and clubs being forced to close – unless the noise they are making is already unreasonable / illegal. This could have a negative cultural impact.
56	Rob Kennedy, Environment Agency	It should apply in designated frontages.
60	Kingsley Izundu, The Royal Borough of Kingston upon Thames	Residential use of upper floors should be encouraged and maximised to increase housing supply and meet local housing needs especially for single persons or couples without children.
61	Tom Minns	Yes
63	Carol Rawlings	It might result in being more noise and disturbance by delivery lorries at night.
64	Johanna Eschbach on behalf of Richmond Bridge Residents Association	The effort of the government should be to make town centres less noisy (road resurfacing with special type of treatment, being careful with bins collection times, encouraging silent buses, etc.) and then yes to encourage more housing above shops. All residents should have minimum standards to live in which complies with WHO policies in terms of environmental pollution. Nobody should be asked to compromise on key standard of living (noise, etc.).
66	Robert Philip Cunliffe	Yes
68 (a)	Mark Jopling	As a last resort though local High Streets should be encouraged as trading and social hubs before being converted to residential.
68 (b)	Mark Jopling	Yes
In terms of developing centre strategies and visions, what should they include? How should these relate to local and wider transport accessibility? Your views in relation to specific centres are welcomed.		
27	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond	<p><i>Comments as above in other sections:</i></p> <p>We cannot be precise about our views on the balance of uses in Central Richmond without the evidence the Council says it will be preparing. It seems highly probable that the current corona virus epidemic will have a major impact on retail, casual dining and the evening economy. Retail has been under stress for several years due to internet shopping and high rates and rents. The leisure sector has been increasingly under stress due to Equity Capital investors taking over of restaurant-chains and funding this with high levels of debt, discounting of meals, rising rents and staffing costs, thin profit margins and over capacity. Many already weak retail and leisure businesses will not survive. This raises major issues about commercial uses in Central Richmond in the future and the rate of economic recovery. Increasingly people may work from home or remotely and office use may decline.</p> <p>As discussed in the theme 'Protecting what is special', Richmond may best be served by focussing on its cultural and heritage assets including the Riverside and the Green. The Richmond Theatre and Orange Tree Theatre are already valuable assets. Perhaps increased provision for the visual arts and performing arts in conjunction with education in the arts could be a viable focus going forward.</p>

Respondent reference no.	Name / Organisation	Detailed comments
		<p>We are not in favour of relaxing the approach to retail planning policies and reducing the importance of the shopping-frontage policies, especially in George Street.</p> <p>We are not in favour of introducing large-footplate retail in Central Richmond. For example, major retail development at Richmond Station in our view is not acceptable and would put at risk the viability and vitality of existing retail activity in Central Richmond.</p> <p>We believe it essential that cumulative impact constraints should remain in both planning and licensing policy so as to avoid any increase in the anti-social behaviour, public nuisance and crime and disorder arising from alcohol consumption in Central Richmond, on the Riverside and on the Green.</p> <p>We are most concerned at the prospect of any relaxation in the uses-classes, whereby planning control over restaurant and bar capacity is weakened. We are concerned at the possibility of permitted development rights being extended to the change-of-use of existing retail premises. We believe the marketing rule may become largely redundant but there should still be control over the future uses of Central Richmond.</p>
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	<p>Hounslow Council in their draft West of London Plan want to link up Hanworth with Whitton via a cycle route along the main roads. Each town centre should have good quality & safe cycle routes planned for the communities they serve.</p> <p>Need to provide secure cycle storage near all stations – for example the cycle storage at Whitton Station is open to all comers thus its targeted by thieves on a regular basis and this discourages commuters using a bike for the first leg of their journey.</p>
31	Tim Catchpole on behalf of MESS	They should include more local business space to discourage commuting to central London and make up for the loss of such space to housing that has occurred in recent years under 'permitted development' rights.
40	Jamie Edwards	Get rid of business rates in the Bourough. That would totally rejuvenate the high streets.
41	Anthony Swan	<p>A centre strategy should include an ICE RINK as was lost in Richmond. There are sites that would work.</p> <p>Support sports, golf clubs and gyms. I know the excellent staff at the Council do this already.. but more could be done.</p>
42	Jeremy Gill	Once again, blindingly obvious. Some shops, some roads leading to them.
44	Roger Cutler	Car parking. It is no good building or developing anywhere if people won't visit because they can't park a car.
45	Sally Beeson	I think there has to be a common sense approach here - some car parking is a must, not everyone can shop on foot all the time. If there is such difficulty parking as in Twickenham, I tend not to shop there. I shop on foot locally as much as I can.
46 (a)	Joan Gibson	<p>Need a full review of public transport. I regularly wait 25minutes+ for buses to Whitton when I see other frequent services go past me half empty. The Whitton bus then comes packed to the gills. If a driver is off sick (which it appears many are always on sick) then drivers need to be taken off more frequent services to ensure the less frequent ones are covered. Trains to Whitton although 4 an hour come grouped together so the net effect is, they arrive every half an hour. Bus timetables need to be linked to train timetables, so when you leave the train you can get a bus quickly. If there are road works buses, cycles and pedestrians need to be given their own route so the road works do not affect their timetables. Road works must be done in a more joined up manner. When the exit to the A316 at Hanworth was closed by TfL they routed the traffic through Whitton but refused to change the traffic light sequencing at the Whitton A316 junction to allow the traffic (which included buses) to disperse. Instead we had miles of traffic jams which again made public transport unreliable.</p> <p>Cars must be stopped from crowding pavements. In Church Street Twickenham even, a single pedestrian cannot walk along the pavement as the pavements have been made narrow due to car parking spots (cars often then park on the kerb). Cars do not even need to access this road – they can use the road next to York House. Ban the car on roads such as this and town centres.</p>
47	Trevor Rowntree	I live near Heathside (Powder Mill Lane) and I feel it needs investment. The Duke of York has been closed for a long time. This should be reopened by offering reduced rates to any chain willing to reopen it. The council should investigate some money in developing this area to make it more pleasant which would hopefully encourage better establishments to open shops in this area. A public house is a key part of a local centre.
49	Margaret Edwards	As crossing the river creates traffic it is desirable to have sufficient services and housing in each centre. The use of private cars to transport children to and from school needs to be reduced, possibly by incentives for parents or schools such as increased bus frequency at key times, time banking schemes that encourage volunteers to accompany small children on foot, bike or bus, car pooling.

Respondent reference no.	Name / Organisation	Detailed comments
52	Winston W Taylor	Not enough time to do the research to answer this.
53	Richard Woolf on behalf of McDaniel Woolf Architects	Connectivity , viability , place making and architectural delight.
55	Jon Rowles	- People who live at the top end of Heathfield Ward have no direct bus service to Whitton High Street and this cuts off a lot of elderly people from their community. - Need to develop cycle routes into Whitton Town Centre to encourage more of an active lifestyle. There is only one part-time cycle route near the high street, and that only operates early in the morning for Twickenham School pupils. - If the telephone exchange comes up for redevelopment - it should be used to extend the town centre and provide extra shops and offices.
63	Carol Rawlings	The development of Ham would lead to a change of character for the area, decreased open space and a dangerous and polluting increase in road traffic. The roads are narrow and choked by residential parking already. Even if basement parking lots were built into the plan, the increase in traffic would be unacceptable. There are blind corners in some roads that are already dangerous.
64	Johanna Eschbach on behalf of Richmond Bridge Residents Association	For East Twickenham, it's critical that they include the policies from the Village Plan that are still relevant and consider any development in context of the Conservation area and buildings of township merit. The approach needs to be holistic. The Local plan should also enable to unlock the right amount of budget to significantly improve high streets which are in the most need. East Twickenham is in dire need of improvement.
69	Geoff Bond on behalf of Ham and Petersham Association	They should look at all wards, but Ham and Petersham, the most inaccessible in terms of transport has been forgotten.
70	Melissa Compton-Edwards	I agree with Richmond Cycling Campaign that any long-term vision for the borough needs to make our town centres people rather than car-centric. None of our town centres should be a place to 'drive through', nor should their space be so dominated by provision for motor vehicles. I think successful town centres are pedestrianised where at all possible, and they support frequent, smaller shopping journeys - and the borough, as part of this strategy, should be discouraging or closing 'out-of-town' style shopping centres built around large car parks.
Should the amount of key shopping frontages be reduced and/or should secondary shopping frontages (where some change of use is already allowed) also be reduced or removed altogether? Do we need to protect shopping in just the core areas which correspond with designated key shopping frontages?		
7	Michael P Martin, Milestone Commercial	Please see comments above.
27	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond	<i>Comments as above in other sections:</i> We are not in favour of relaxing the approach to retail planning policies and reducing the importance of the shopping-frontage policies, especially in George Street. We are most concerned at the prospect of any relaxation in the uses-classes, whereby planning control over restaurant and bar capacity is weakened. We are concerned at the possibility of permitted development rights being extended to the change-of-use of existing retail premises. We believe the marketing rule may become largely redundant but there should still be control over the future uses of Central Richmond.
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	Need to fully review it – and not just take the predetermined view that it needs to be reduced. Indeed, many residents in Whitton want the percentage of retail units to increase in Whitton.
31	Tim Catchpole on behalf of MESS	Key shopping frontages and secondary shopping frontages should be retained.
39	Solomon Green	Core retail comparisons are probably less necessary as many, if not most, compare online.
40	Jamie Edwards	You should make it compulsory to have high quality, colour coded shop fronts that are kept in acceptable condition.
41	Anthony Swan	Some key frontages are important for maintaining the character of a shopping or High street. Some are not. Let economics mainly see which shops remain, move to a pop up shop somewhere, which should be encouraged.

Respondent reference no.	Name / Organisation	Detailed comments
42	Jeremy Gill	Do you mean that our High Streets should have some shops on them? Yes.
44	Roger Cutler	True competition should be allowed. Most importantly, retail units should be desirable & profitable places for people to work.
45	Sally Beeson	Two small and very successful shops in Teddington have recently closed, because: The landlord increased the rent and leasehold years Local people would go into one shop and buy online instead - thereby increasing van traffic many fold
46 (a)	Joan Gibson	The retail units at bottoms of flats need to be reduced and used for community and business space
49	Margaret Edwards	See 34 above.
52	Winston W Taylor	Again, further research is required to answer this. In general I think we ought to reflect demand from the most vulnerable and ensure the shops they depend upon are supported.
53	Richard Woolf on behalf of McDaniel Woolf Architects	We need to reduce retail and decommission it strategically , rather than just let it wither.
55	Jon Rowles	The main threat town centres face is the near-total loss of retail - and if anything we need more protections not less.
60	Kingsley Izundu, The Royal Borough of Kingston upon Thames	The amount of key shopping frontages should not be reduced and/or the secondary frontages reduced or removed altogether unless account is taken of market signals justifying their reduction. The amount of key shopping frontages define the extent of a town centre's important shops where the dominant retail facilities and footfall are concentrated. Core Shopping areas which correspond with designated key shopping frontages should be protected.
61	Tom Minns	Keep the spread we have. It reduces travel.
63	Carol Rawlings	The shopping parade in Ham Street/Ashburnham Road needs to be updated and the number of units decreased. At present it is an eyesore with several units unoccupied for years.
64	Johanna Eschbach on behalf of Richmond Bridge Residents Association	Shopping frontage should be maintained as much as possible to contribute to the livelihood of the neighborhood and key "retail needs" indispensable to the area should be identified and maintained.
66	Robert Philip Cunliffe	adopt a wider spread of convenience based shopping centres, and rationalise the delivery systems driven by the rapidly expanding use of internet based shopping, to avoid endless road use by competing internet companies.
68 (b)	Mark Jopling	As a last resort, thriving local High Streets are essential social hubs. The response to CV-19 has started to rebuild a stronger sense of community.
Should the 'key shopping area' relating to the operation of permitted development rights continue to be both key and secondary frontages?		
Of respondents who answered the question: 6 said yes, 2 said no and 10 don't know [20 did not answer the question]		
Is it appropriate to continue to protect local top-up shopping facilities?		
Of respondents who answered the question: 20 said yes, 1 said no and 5 don't know [12 did not answer the question]		
Is it appropriate to continue to protect local top-up shopping facilities? - Should this protection only extend to food shops and/or some selected types of businesses?		
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	<i>Should this protection only extend to food shops and/or some selected types of businesses?</i> They are extremely important to older people, who otherwise would only make it to the town centre once a week – or in some cases never get out of the house at all.
31	Tim Catchpole on behalf of MESS	Yes, in order to minimise travel.
41	Anthony Swan	I dont know what protection they get. Generally let economics decide.

Respondent reference no.	Name / Organisation	Detailed comments
42	Jeremy Gill	I don't know what you mean by that.
44	Roger Cutler	No
45	Sally Beeson	I think all small local shops need protecting
49	Margaret Edwards	Yes
52	Winston W Taylor	Not sure
55	Jon Rowles	No - we need to protect shops
56	Rob Kennedy, Environment Agency	Yes
60	Kingsley Izundu, The Royal Borough of Kingston upon Thames	This protection should extend to essential goods shops and post office facilities.
61	Tom Minns	Yes
63	Carol Rawlings	Yes
64	Johanna Eschbach on behalf of Richmond Bridge Residents Association	Food shop
66	Robert Philip Cunliffe	All
69	Geoff Bond on behalf of Ham and Petersham Association	This should be all shopping needs to make sure we have a thriving community.
Is it appropriate to continue to protect local top-up shopping facilities? - Is 400 metres an appropriate proxy for easy walking distance?		
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	Yes, but where possible it should be shorter – to take into account that people are living much longer than when the policy was originally brought in.
28	Alice Shackleton on behalf of The Kew Society	Yes
31	Tim Catchpole on behalf of MESS	For most it would be more like 800m
39	Solomon Green	It could be doubled without any loss.
41	Anthony Swan	No. But Yes for a fir oerson and when its not belying down with rain.
42	Jeremy Gill	Do you mean can most people walk 400 metres? Why not say so. Yes
44	Roger Cutler	Yes. It is usually much further.
45	Sally Beeson	Yes
46 (a)	Joan Gibson	Too close - Whitton has just had a KFC and Dominos open in the High Street which 3000 school children can access
49	Margaret Edwards	yes
52	Winston W Taylor	No. Too much. I can now do 400m easily but after a spell in hospital at the end of last year I could not do 100m for a couple of months.
55	Jon Rowles	EU policy research which suggests a 300m walk to basic services is more appropriate.
56	Rob Kennedy, Environment Agency	Yes

Respondent reference no.	Name / Organisation	Detailed comments
60	Kingsley Izundu, The Royal Borough of Kingston upon Thames	Yes
61	Tom Minns	Yes
63	Carol Rawlings	Yes
64	Johanna Eschbach on behalf of Richmond Bridge Residents Association	Yes
66	Robert Philip Cunliffe	no - 600 metres
69	Geoff Bond on behalf of Ham and Petersham Association	yes
Is it appropriate to continue to protect local top- up shopping facilities? - Should we continue to provide additional protection for shops selling essential goods and Post Offices generally?		
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	Yes we strongly support this. They provide great value to the community.
28	Alice Shackleton on behalf of The Kew Society	Yes
31	Tim Catchpole on behalf of MESS	Yes
39	Solomon Green	Yes
41	Anthony Swan	Yes
42	Jeremy Gill	Yes of course. Why wouldn't you?
44	Roger Cutler	Definitely. Ensure there are banks present.
45	Sally Beeson	Yes
46 (a)	Joan Gibson	Yes and extend to banks
49	Margaret Edwards	yes
52	Winston W Taylor	Yes
55	Jon Rowles	Yes - these are extremely valuable, esp for the elderly
56	Rob Kennedy, Environment Agency	Yes
60	Kingsley Izundu, The Royal Borough of Kingston upon Thames	Yes, because they support a sustainable and inclusive communities by making it possible for the elderly, women with children in pushchairs, people with disability and other families to meet top up shopping needs by Thewalking or cycling.
61	Tom Minns	Yes
63	Carol Rawlings	Yes
64	Johanna Eschbach on behalf of Richmond	Yes

Respondent reference no.	Name / Organisation	Detailed comments
	Bridge Residents Association	
66	Robert Philip Cunliffe	no
68 (a)	Mark Jopling	Yes
68 (b)	Mark Jopling	Yes
69	Geoff Bond on behalf of Ham and Petersham Association	yes
Do we need to continue to protect pubs as strongly?		
Of respondents who answered the question: 14 said yes, 8 said no and 3 don't know [13 did not answer the question]		
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	In the more suburban parts of the borough, such as Heathfield Ward there is now only one open pub and one community association bar which mean the majority of the population either have to catch a bus or a taxi to go out and socialise. This is probably prompting a number of our younger residents to move out of the area. The test shouldn't be – do they currently offer food – but could it be reasonably provided. Otherwise you are creating an easy way for a developer to move in and make windful profits at the cost of the local community.
31	Tim Catchpole on behalf of MESS	It is better that pubs should serve food as well as drink. The pubs that remain are now gastro pubs.
39	Solomon Green	I do not know of any that do not sell some form of food even if it is only crisps.
41	Anthony Swan	But give the local community the chance to take them over. If that doesnt happen allow change of use.
42	Jeremy Gill	There are too any pubs already. We don't need to support them.
44	Roger Cutler	Too many pubs are closing.
45	Sally Beeson	These pubs could be used as dwellings perhaps as more people drink at home
46 (a)	Joan Gibson	Difficult one - if pubs are struggling that do not offer food - they need to offer food (they are a private business). The Duke or York at the end of Powdermill Lane was very unpleasant and attracted bad behaviour and drug dealing. It is good that this is going. Well run popular pubs stay open.
47	Trevor Rowntree	My local pub has been closed for a long time. I now do not have a pub in easy walking distance. This served as a community centre and the area is worse off since it has closed. What is being done to encourage the re-opening of the Duke of York pub?
49	Margaret Edwards	Pubs need to find ways to be of value, as fewer people drink alcohol and dont want to pay high prices for soft drinks the pubs need to offer social activities, free space for community groups - if they do this they should be protected
52	Winston W Taylor	At the moment unscrutable pub companies deliberately run down pubs by raising rents and other means and then sell to developers giving evidence that the pub is not viable. Developers then purchase knowing that the Council will refuse planning for two years but then grant it.
53	Richard Woolf on behalf of McDaniel Woolf Architects	Stop the romantic nonsense of the ' happy boozer '.... the pub has seen its day. It was a 19th Century affectation
55	Jon Rowles	It has become common for developers to buy pubs and then refuse to let the out to try and get around the marketing requirements
60	Kingsley Izundu, The Royal Borough of Kingston upon Thames	They are community facilities where people meet to socialise.
63	Carol Rawlings	They are a valuable social gathering centre. Alternatively, require coffee shops to stay open.
68 (a)	Mark Jopling	Pubs to be encouraged to be more social hubs if the demand for their traditional product has declined in that neighbourhood
68 (b)	Mark Jopling	Pubs should be encouraged to think what their local community needs

Respondent reference no.	Name / Organisation	Detailed comments
69	Geoff Bond on behalf of Ham and Petersham Association	all pubs with and without food are struggling. Key is to remove the financial incentive to convert pubs to other uses
Are the locally set thresholds for impact and sequential tests still appropriate?		
Of respondents who answered the question: 4 said yes, 3 said no and 13 don't know [18 did not answer the question]		
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	The more pubs that are lost – the more important the remaining ones are.
46 (a)	Joan Gibson	I have no idea what these are - but find LBRuT planning accept and support developers results on sequential tests when they know they are incorrect - LBRuT know for THS Castell Hospital site is sequentially better than Bridge Farm, but still supported Bridge Farm site. What will LBRuT do to fix this.
49	Margaret Edwards	The doc is too long to look at all the detail
53	Richard Woolf on behalf of McDaniel Woolf Architects	Economic viability testing should end ... it's no longer fit for purpose.
60	Kingsley Izundu on behalf of The Royal Borough of Kingston upon Thames	The level of locally set threshold for impact and sequential tests should be backed by research evidence to justify it.
How long should shops and pubs be marketed before a change of use is allowed if the proposal is contrary to policy?		
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	Two years is too short as landlords, and some large chains are prepared to keep a site empty as change of use can result in an uplift of value in excess of two years loss rent.
39	Solomon Green	For shops a maximum of six months but only if the asking rent is not deliberately set too high as is the case when landlords wish to obtain permission for change of use. Otherwise, say, five years (or more)..
41	Anthony Swan	Ah.. these can be run down on purpose and marketed at unrealistic prices related to their now lower turnover. A realistic view should be taken , maybe audit and spot checks, to confirm any claim of hopeless business conditions. A value judgement re length of time may then be made. Also ask the locals...
42	Jeremy Gill	Do you mean how long they should be allowed to stay vacant? Why not say so. 6 months.
44	Roger Cutler	The least time possible.
45	Sally Beeson	No idea
46 (a)	Joan Gibson	4 months
47	Trevor Rowntree	As long as required. Investors seem to be able to purchase properties and market them for an inflated price to force a change of use. Shop/pub change of use should no longer be granted to ensure this is not allowed to continue. If the shop/pub is not sold then sales should be forced and incentives should be offered to encourage the current use rather than accepting change of use.
52	Winston W Taylor	This must depend on the facts of each case. But there should be a signal to developers that it will not be allowed as being contrary to policy. Sham reports showing that a premises is unviable with designated usage should be examined much more critically than in the past.
53	Richard Woolf on behalf of McDaniel Woolf Architects	1 year.

Respondent reference no.	Name / Organisation	Detailed comments
55	Jon Rowles	Two years is too short - and most of the vacancies recorded in our high streets are down to landlords keeping units empty so they can gain a change of use and thus windfall profit. Maybe extend it to three years - ensure that its offered at the going rate from the outset.
56	Rob Kennedy, Environment Agency	1 year
60	Kingsley Izundu, Royal Borough of Kingston upon Thames	One year
61	Tom Minns	6months
63	Carol Rawlings	I don't know. As I can't easily access the local plan, it is difficult to know what you are referring to.
64	Johanna Eschbach on behalf of Richmond Bridge Residents Association	At least 2 months but more than the time, these changes need to be shared with the relevant associations (including neighbours) to make sure the community can properly assess.
66	Robert Philip Cunliffe	6 months
69	Geoff Bond on behalf of Ham and Petersham Association	Pubs should a minimum of five years but change of use to should not be to residential but to other community uses after this time.
Should a policy be developed for redevelopment of existing retail parks/stores in less central locations?		
Of respondents who answered the question: 15 said yes, 4 said no and 4 said don't know [15 did not answer the question]		
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	Yes – some of the out of town 'sheds' are hugely space inefficient. Shops / offices should be retained on lower floors – with flats above. We need genuine mixed-use development – so maybe insist that new offices are included to address the shortage in the borough. Large supermarkets such as Sainsbury's St Clare's could become mixed use and provide much needed housing units and workplaces above the footprint of the existing floor.
32	Mark Jopling on behalf of UPPFT	Creatively re-build declining "big box" retail sites, car parks and railway stations to enable more housing without encroaching on green space.
28	Alice Shackleton on behalf of The Kew Society	Retail parks are prey to developers who will maximise economic gain by maximising density. It is essential that such retail parks are subject to a policy of redevelopment, focusing on height maxima (not tall buildings), provision of significant green space (for health and environmental reasons) and provision of on-site social infrastructure (usually dealt with by legal agreement).
31	Tim Catchpole on behalf of MESS	Yes, they take up a lot of valuable space and should be discouraged.
35	Alice Roberts, CPRE London	Surface and multi-storey car parks, along with low-rise retail sites, should be redeveloped to make more efficient use of space and discourage car trips. <ul style="list-style-type: none"> • Surface car parks are an inefficient use of space and encourage non-essential car journeys. In Annex 1 a number of sites are identified which could be redeveloped to find space for housing and commerce and at the same time reduce reliance on cars. • These sites are viable and much more sustainable alternatives to Green Belt. [See Annex 1 in the Schedule of Call for Sites Responses]
41	Anthony Swan	You don't need a policy for this. Judge it on a case by case basis but generally let economics and transport decide.
42	Jeremy Gill	I recommend you don't mess with this, you will only make people angry.
44	Roger Cutler	Only if they are properly planned & accessible. Should not, however, replace high streets.

Respondent reference no.	Name / Organisation	Detailed comments
46 (a)	Joan Gibson	If a shop is not working in a central location - it will not work in a less central location
53	Richard Woolf on behalf of McDaniel Woolf Architects	We are reordering land use at a much slower rate than in previous generations. Take a look at the long view. Respond quickly before land becomes redundant.
55	Jon Rowles	Most of these are very wasteful of space. The development could include local shopping facilities, offices and some housing.
60	Kingsley Izundu, Royal Borough of Kingston upon Thames	Such policies should encourage mixed use incorporating housing or for housing densification depending on context and constraints.
63	Carol Rawlings	Retail parks encourage people to use private vehicles. They could be redeveloped for social housing.
68 (a)	Mark Jopling	See above Massive opportunity to re-think the space dedicated to "Big Box" retail, building multiple storey developments over supermarkets and their car parks
68 (b)	Mark Jopling	Yes - the biggest opportunity in the Borough for housing
Increasing jobs and helping business to grow		
Do you agree with the proposed policy directions?		
Of respondents who answered the question: 17 said yes, 1 said no and 2 don't know [18 did not answer the question]		
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	Large housing schemes should also provide more workspaces or make a contribution to off-site ones.
19	DP9 Ltd on behalf of London Square Developments	See comments below.
52	Winston W Taylor	Broadly agree
64	Johanna Eschbach on behalf of Richmond Bridge Residents Association	We support the general direction of continuing to protect industrial sites to encourage SMEs and new businesses and to protect river-related business. It is essential that Richmond continues to be a place of employment not just a dormitory; this must be an essential contribution to shifting the current large outflow of commuting and its contribution to congestion, pollution etc
69	Geoff Bond on behalf of Ham and Petersham Association	Not enough emphasis on live work settings
Should we continue to protect our industrial-type uses?		
Of respondents who answered the question: 17 said yes, 1 said no and 2 don't know [18 did not answer the question]		
14	Mayor of London	Industrial and Employment Land The Mayor welcomes Richmond's intention to conduct an up to date Employment Land Review and carry out an industrial land audit to supplement its current evidence on employment land. Richmond should follow the Mayor's guidance set out in his Practice note on industrial intensification and co-location through planned and masterplan approaches. Guidance is also set out in Policies E4 and E7 of the Intend to Publish London Plan and should be embedded in the draft Local Plan. Again, these policies are subject to Directions from the Secretary of State. Richmond should clearly differentiate its approach towards industrial and office development.

Respondent reference no.	Name / Organisation	Detailed comments
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	There is a risk the council is misreading the market about industry use not being in demand and being replaced with distribution. What we are more likely to be seeing is the Heathrow airports freight business edging out local manufacturing businesses by out bidding them.
46 (a)	Joan Gibson	You should continue to protect business premises, but add new small low-cost premises instead of or as well as retail units at the bottom of flats.
53	Richard Woolf on behalf of McDaniel Woolf Architects	I'm sorry ... I'd love to say ' yes ' , but I know the direction of travel is away from manufacture and has been for 30 + years.
58	Michael Atkins, Port of London Authority	The PLA supports the intention of the policy directions to establish Agent of Change principle into policy, which places the responsibility for mitigating impacts from existing noise and other nuisance-generating activities or uses on the proposed new noise-sensitive development. This must be included in any future Local Plan policy in line with paragraph 182 of the National Planning Policy Framework (NPPF) and the emerging London Plan.
Should we take a proactive approach and encourage intensification, or adopt a more locally distinctive policy in this regard that focuses less on introduction of residential on industrial sites, but that encourages further industrial / employment uses?		
14	Mayor of London	See comments below.
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	Should focus on the latter – as more local jobs will help us improve the environment.
31	Tim Catchpole on behalf of MESS	We recommend a study including survey work is required in order to properly shape this policy.
41	Anthony Swan	Encourage further industrial and employment. Always.
42	Jeremy Gill	No
44	Roger Cutler	Yes - be pro-active. It would be a start if you weren't trying to reduce industrial use. Twickenham Embankment & businesses on Eel Pie Island are due to be starved out by making the Embankment traffic-free. No existing businesses can survive without collections & deliveries. Local trades-people will lose work because they can't park vans.
45	Sally Beeson	I think a locally distinctive policy could be decided on locally by residents and business
46 (a)	Joan Gibson	No you should build flats above business premeses - more efficient land use, employees and customers on site.
47	Trevor Rowntree	Yes. industrial / employment uses should be given priority over residential sites.
51	Su Bonfanti	I support the general direction of continuing to protect industrial sites to encourage SMEs and new businesses and to protect river-related business. It is essential that Richmond continues to be a place of employment not just a dormitory; this must be an essential contribution to shifting the current large outflow of commuting and its contribution to congestion, pollution etc. I don't recall that you have really linked local employment and environmental impact together in your policies before and I think this is something you need to get across to residents more.
52	Winston W Taylor	Not enough time to consider properly
53	Richard Woolf on behalf of McDaniel Woolf Architects	I'm sorry I'd love to say ' yes ' to support of industrial use , but where are the manufactures for the 21st Century located ?? Not in Greater London.
55	Jon Rowles	We need a more local approach that encourages further industrial / employment uses - due to the large amount of space already lost.
60	Kingsley Izundu, Royal Borough of Kingston upon Thames	Given that the emerging London Plan places Richmond Council on the "Restraint" category in regard to managing its stock of industrial land, it seems reasonable to Richmond to adopt a more locally distinctive policy that focuses less on introduction of residential on industrial sites.
68 (a)	Mark Jopling	Need Richmond to be ahead of economic shifts driven by automation and ecology
Should we continue to specify flexible small-scale units suitable to meet local business needs?		

Respondent reference no.	Name / Organisation	Detailed comments
Of respondents who answered the question: 17 said yes, 1 said no and 1 don't know [19 did not answer the question]		
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	We are very close to Heathrow Airport and thus larger sites are likely to be used for freight forwarding that employ relatively few people and provide lower quality jobs.
31	Tim Catchpole on behalf of MESS	This will depend on the study outcome.
44	Roger Cutler	Small-scale units are essential. Stop trying to force them out of business.
46 (a)	Joan Gibson	At the bottom of flats instead of retail
53	Richard Woolf on behalf of McDaniel Woolf Architects	Small scale is the best option.
What priority should we give to employment uses over residential amenity, if at all?		
2	CBRE on behalf of LGC Ltd, Teddington	<i>[See the Schedule of Call for Sites Responses relating to Queens Road site Teddington]</i>
19	DP9 Ltd on behalf of London Square Developments	<p>On behalf of our client, London Square Developments, we submit the following representations to the London Borough of Richmond upon Thames Local Plan Direction of Travel Consultation and Call for Sites. These representations relate to the Greggs Bakery, Gould Road, Twickenham, known as the 'Site'.</p> <p>The existing Site comprises the former Greggs Bakery Site in Twickenham, within the London Borough of Richmond Upon Thames. The Site is L shaped and is bound by the River Crane to the north and railway line beyond, residential properties on Norcutt Road to the east, Edwin Road to the south, residential properties on Crane Road to the west and further residential properties on Crane Road/ Gould Road and at Crane Mews to the north west.</p> <p>There are a range of buildings covering the majority of the Site which comprises an area of 1.1ha. The majority of the Site is covered by a single storey industrial shed alongside large extract equipment. There are also a number of associated two and three storey commercial buildings across the remainder of the Site which have developed in a piecemeal way over time. The existing buildings have reached the end of their life cycle.</p> <p>Background By way of background, the Site is subject to a planning application (ref. 19/0646/FUL) for residential-led redevelopment. This application was submitted in February 2019 and is pending determination. It is the project team's firm position that the Site is appropriate for residential-led development as set out within the planning submission and as explained further below.</p> <p>The Site is currently allocated within the 'Locally Important Industrial Land and Business Park – West Twickenham Cluster (including Greggs Bakery and surroundings), Twickenham' under the adopted Local Plan. The Site also falls within the 'Key Office Area – West Twickenham Cluster' under the adopted planning policy position.</p> <p>Representations were made to the currently adopted Local Plan (July 2018). These representations to the new Local Plan follow the same matters raised in relation to this Site. It was thoroughly demonstrated that the Site is inappropriate for continued employment use and this position was supported by the Council's own evidence base assessment (Employment Sites & Premises Study, 2017 prepared by Peter Brett Associates). The report identifies the 'West Twickenham Cluster (including Greggs Bakery and surroundings)' as a designated site that is less attractive to occupiers and identifies it as being constrained by poor access, particularly for HGV's, and by its residential surrounds. Paragraph 3.10 of the Study states that the West Twickenham Cluster is "located within residential areas like many of Richmond's</p>

Respondent reference no.	Name / Organisation	Detailed comments
		<p><i>industrial sites, but they also have particularly poor access arrangements that significantly constrains their potential for redevelopment for alternative forms of industrial use."</i></p> <p>Despite the locational disadvantages identified within the LBRuT Employment Sites and Premises Study (2017), which formed part of the Council's evidence base, the Site was allocated within the 'West Twickenham Cluster (including Gregg's Bakery and surroundings)' which seeks to protect the use of the land for employment. This approach is inconsistent with Paragraph 82 of the National Planning Policy Framework ('NPPF') which directs industrial uses to suitably accessible locations. The allocation of the Site is also contrary to draft London Plan Policy GG5 which requires Boroughs to plan for sufficient employment and industrial space in the <u>right locations</u>.</p> <p>Prior to the adoption of the current Local Plan in October 2013, the LBRuT published the Local Plan 'Site Allocations Plan' for consultation. Within this, draft Policy TW 11 (West Twickenham cluster, Twickenham) identified the Site for "<i>Mixed residential, start-up and small scale hybrid business space and/or primary school. Proposed Designation as key employment site.</i>" This document was not taken forward and has been superseded by the adopted Local Plan (July 2018), however this represents the Borough's initial approach to the Site's redevelopment which was considered to be more appropriate in this location.</p> <p>In the intervening period since the adoption of the Local Plan in July 2018, the Site has been marketed by Colliers International's marketing team for employment uses. This has occurred over a period of more than two years since January 2018 and is ongoing. To date no meaningful offers have been received for the Site due to the severe site restrictions. It is acknowledged within the Marketing Report prepared in support of the planning application that there are strong trends for West London industrial markets in prime locations such as Park Royal, Acton and Heathrow. However, it is recognised that these areas benefit from superior logistical and distributional links. The Site's location within a residential area is off-putting to industrial occupiers as the roads surrounding the Site are unsuitable for large delivery vehicles and has deterred a number of potential occupiers, as demonstrated within the Marketing Report.</p> <p>Offers have been invited for the Site in its current use as industrial/ employment generating floorspace. The Marketing report concludes that the agents cannot let the Site due to the current configuration and Site restrictions. It is confirmed that potential industrial or warehouse occupiers were put off by the physical constraints associated with the Site. The reasons were identified as: the size and configuration of the buildings which are not fit for current uses, the small yard and insufficient car parking area which are an issue owing to the high site coverage, the tight arrangement of the units within the loading bay which is difficult to navigate in certain areas, concerns with regards to road access into the Site and traffic movement of HGV's and vans for deliveries and the surrounding established residential area and concerns with regards to potential restrictions on noise and hours of use.</p> <p>These long-standing issues forced Greggs to relocate bakery operations to a more appropriate site which has better logistical connections. The Site is now redundant and the bakery operations have ceased with only part of the Site in continued use for associated operational functions. The Site is in poor condition, comprises asbestos and would need significant expenditure in order to bring it up to modern standards.</p> <p>The Site was not considered to be suitable by any of the operators approached and no offers were forthcoming. There was interest in the Site for longer term redevelopment of the Site for residential use however commercial occupiers are deterred by the evident Site constraints.</p> <p>The marketing exercise has demonstrated that the redevelopment of the Site for similar employment generating uses would be an unviable prospect as the Site is too restricted to retain the same floor area and deliver sufficient servicing and car parking. As such there is no realistic prospect of a commercial operator occupying the Site either in its current condition or through redevelopment.</p> <p>The applicant has also sought advice from Milestone, a local commercial agent who supports the findings of the Marketing Report produced by Colliers and confirms that whilst there is demand for light-industrial units within the Borough, the registered demand is for purpose-built trading estates. Examples of these locally comprise Colne Road, Twickenham, Princes Works and Teddington Business Park. This type of commercial accommodation is able to accommodate car parking and open-plan design with mezzanine floors or double height workspace for fork-lift access in addition to turning circles for 7-tonne plus lorries. Additionally, these</p>

Respondent reference no.	Name / Organisation	Detailed comments
		<p>estates have the benefit of enhanced electricity capability and dedicated waste management. The suitability of the Greggs Site to accommodate the same grade of floorspace is considered poor.</p> <p>It has been demonstrated within the Milestone report that there are plenty of much better located, more accessible, higher quality office buildings and Sites within Twickenham that are vacant and could accommodate any demand. This data is specific to the Site's location and is therefore a material consideration which should be taken into account. It is demonstrated in the evidence provided through the ongoing marketing exercise and from commercial agents that there is no demand for the use or redevelopment of this site for commercial employment generating uses.</p> <p>The demand for housing within the Borough is significant and should be prioritised over the restriction to retain the employment land uses in areas inappropriate for continued use. This approach is backed by planning permission ref. 17/1033/FUL which was granted on appeal on 23rd May 2018 for the redevelopment of the adjacent Lockcorp House, also within the West Twickenham Cluster, to deliver student housing. Importantly, the Inspector's report notes that <i>"whilst the loss of this existing employment site would conflict with Policies DM EM2 and LP40, the proposed student accommodation would meet and identified housing need which policies DM HO 5 and LP37 support. On the evidence before me, including what I heard at the hearing, I consider the need for the development outweighs that of retaining the employment use of the site."</i></p> <p>Draft London Plan update</p> <p>It is important and extremely relevant to note that the Secretary of State ('SoS') has identified that the draft London Plan Intend to Publish Version is not consistent with the NPPF and is therefore not sound and cannot be published. It is acknowledged by the SoS in his letter to the Mayor dated 13 March 2020 that the previous aspiration to 'retain' sufficient industrial capacity 'may not be realistic' and is inconsistent with the NPPF which importantly requires <i>"that sufficient land of the right type is available in the right places and at the right time to support growth and innovation."</i>(Emphasis added).</p> <p>In particular, the SoS recommends that Policy E4 is modified to remove the requirement for 'no net loss' of industrial floorspace capacity (and operational yard space capacity) within designated SIL and LSIS.</p> <p>The SoS recommends new supporting text at paragraph 6.4.8 which sets out that <i>"Where industrial land vacancy rates are currently well above the London average, Boroughs are encouraged to assess whether the release of industrial land for alternative uses is more appropriate if demand cannot support industrial uses in these location. Where possible a substitution approach to alternative locations with higher demand for industrial uses is encouraged."</i></p> <p>The proposed modifications are required to make it easier for London Boroughs to identify a supply of industrial land to meet demand, or to replace other land that can subsequently be released for housing development. It also removes the target that is deemed to be unrealistic.</p> <p>The currently adopted Local Plan policies and West Twickenham cluster site allocation were prepared in the context of the draft London Plan requirement to retain capacity, and this context has now changed significantly. This is of key importance in assessing the Greggs Site for redevelopment for alternative uses, particularly housing.</p> <p>Richmond Annual Monitoring Report</p> <p>Richmond's Local Plan Annual Monitoring Report (AMR) 2018/19 (September 2019) assesses the Borough's housing supply and delivery in relation to the adopted London Plan's requirement of 3,150 new homes over the period between 2015-2025. The Borough delivered a net gain of 419 units in 2018/19 and considers that it will meet its target by 2025. Richmond estimates a supply of 1,474 new homes coming forward over the five-year period, meeting the target in the London Plan 2015. However, it is noted that the draft London Plan sets an increased ten-year housing target of 4,110 net completions or 411 per year. This is a target that has not been disputed by the SoS during his review of the draft Plan. The London Borough of Richmond upon Thames has not yet demonstrated how they will meet these revised targets and the AMR therefore fails to demonstrate a five-year housing supply.</p>

Respondent reference no.	Name / Organisation	Detailed comments
		<p>Given the GLA's projected growth in the Borough's population, the need for housing in the Borough will continue to outstrip supply. This will continue to drive up house prices making the borough less affordable for all. Moreover, the borough has delivered only 17% (70 units net) of housing as affordable in 2018/19 which is considerably below the strategic borough-wide target (50%). Richmond will therefore need to consider further opportunities, including the Site, to deliver housing. The proposals for the redevelopment of the Greggs Site seek to deliver 116 new dwellings comprising a significant number of family-sized homes and affordable units. This contribution to the overall housing supply and affordable housing provision in the Borough should not be overlooked.</p> <p>-----</p> <p>Delivering new homes and an affordable borough for all – p. 19</p> <p>We support the consideration of further locations for housing delivery, including site allocations to meet housing need. Brownfield employment land that is unviable for continued use, including the subject Site, should be considered for this purpose.</p> <p>Increasing jobs and helping business to grow – p. 28-29</p> <p>It is acknowledged by the SoS in his letter to the Mayor dated 13 March 2020 that the previous aspiration to 'retain' sufficient industrial capacity 'may not be realistic' and is inconsistent with the NPPF which requires "that sufficient land of the right type is available in the right places and at the right time to support growth and innovation." In particular the SOS recommends that draft London Plan Policy E4 is modified to remove the requirement for 'no net loss' of industrial floorspace capacity (and operational yard space capacity) within designated SIL and LSIS.</p> <p>It is considered that investment in industrial and employment land to encourage redevelopment and refurbishment for modern industrial occupiers will not necessarily spur demand. Locational characteristics are important for occupiers, particularly access provision and potential for land use conflict.</p> <p>As outlined above, the Site is not suitable for continued employment use and is blighted by highways impacts and locational difficulties. In light of the SoS' guidance and in line with the NPPF, the allocation of the Site which is in an unsuitable location for continued employment use should be reviewed. The need to 'retain' capacity is unrealistic and should be relaxed.</p>
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	Delivery noise can be very disturbing – esp. when it involves HGVs. So maybe focus on restricting the really disturbing activities, rather than keeping the whole site shut.
31	Tim Catchpole on behalf of MESS	See above . This will likewise depend on the study outcome.
41	Anthony Swan	Its a balancing act. eg if a business park was near a school then objections may be valid because of pollution. If near houses then which was there first. Maybe the business park businesses are too industrial for its coexistence with domestic housing.
42	Jeremy Gill	Depends on the individual circumstances, you can't have a meaningful policy about something so case-specific.
44	Roger Cutler	A properly planned assessment is needed in every case. No priority should just be given.
45	Sally Beeson	In individual case should be looked at individually and not as a lumped together policy
46 (a)	Joan Gibson	none they can both be built at the same site
47	Trevor Rowntree	Employment uses should be given priority. Neighbours' objections should be taken in to account but should not override the benefit to the whole area.
52	Winston W Taylor	Neighbours will almost always object. I moved into a flat 35 years ago close to Teddington Business Park. Neither I or my neighbours had any problems - noise. traffic or otherwise with it. Business does need some sort of priority to override unjustified residential complaints.
53	Richard Woolf on behalf of McDaniel Woolf Architects	Agree on the wholesale redevelopment of industrial sites rather than permitted development reuse which provides poor quality dwellings.
55	Jon Rowles	All depends on what is reasonable - could make the agent of change pay for soundproofing and have a more detailed policy on what amount of noise is acceptable when.
63	Carol Rawlings	Residential amenity should be given priority. But let's wait and see what emerges from the current virus crisis. All will change.....

Respondent reference no.	Name / Organisation	Detailed comments
68 (b)	Mark Jopling	Flexible office space is key. Lesson from CV-19 is that we don't all need to herd into Central London 5 days per week - more flexible local office space would make a big difference to carbon footprint and quality of life
69	Geoff Bond on behalf of Ham and Petersham Association	Impact on neighbours matters so should be a consideration
What type of sites, buildings and facilities are most needed to support the borough's office occupiers, in particular its small and micro businesses, as well as those working remotely from their usual place of work?		
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	Many small businesses used to occupy space above shops, but most of these spaces have now been converted to flats, leaving town like Whitton with virtually no office space.
36	Tim Catchpole on behalf of MESS	See above. This will likewise depend on the study outcome.
41	Anthony Swan	Low rent/rate shared space with flexible rental periods. ie down to 1 month. High level of security for eg their computer equipment.
42	Jeremy Gill	Offices, I would imagine.
44	Roger Cutler	Car parks or parking facilities.
45	Sally Beeson	Existing building - eg the now empty Nat West and Lloyds Banks in Teddington
48	Roger Wilson on behalf of Roger Wilson Consulting LLP	Promote walking, public transport and cycling. Stop use of cars and vehicles across the Borough. Do not provide parking spaces for businesses. For existing parking spaces, until they are removed, heavily increase parking levy and charges.
52	Winston W Taylor	The "Space" development in Teddington appears to be successful - that is purely an observation on my part looking at the number of small business logos in reception - if I am right, similar facilities might be encouraged elsewhere.
53	Richard Woolf on behalf of McDaniel Woolf Architects	Well , the space above shops and the beneficial use of historic buildings, decommissioned places of worship etc ...
55	Jon Rowles	- In Whitton, there is hardly any office space left. - Need more flexible office space for start-ups in places like Twickenham and Richmond that are suitable for new businesses. The existing providers are very expensive so maybe there is something that could be incorporated into libraries or the town hall - as some form of social enterprise incubator outfit.
63	Carol Rawlings	Fast, affordable and reliable broadband is urgently needed throughout the borough to support home-working.
68 (a)	Mark Jopling	See above, growth in flexible office spaces as people avoid travelling to central London
69	Geoff Bond on behalf of Ham and Petersham Association	Local small offices not all centred on a small number of locations.
Should we encourage and protect river-related business?		
Of respondents who answered the question: 17 said yes, 0 said no and 2 don't know [19 did not answer the question]		
27	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond	We support protection of riverside employment.

Respondent reference no.	Name / Organisation	Detailed comments
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	It adds greatly to the character of the area – and is a very good way of increasing the employment opportunities for those without many qualifications.
31	Tim Catchpole on behalf of MESS	This also needs to be addressed in this study.
44	Roger Cutler	At the moment you are trying to destroy them in Twickenham.
45	Sally Beeson	It's unique
46 (a)	Joan Gibson	Is it needed?
52	Winston W Taylor	This has not been the case, in my experience, for some time.
53	Richard Woolf on behalf of McDaniel Woolf Architects	100% !!
55	Jon Rowles	More boat houses could be provided both for small boat and rowers etc
58	Michael Atkins, Port of London Authority	It is welcomed that the Direction of Travel document states that the council will continue to protect river dependent facilities such as boatyards, wharves, slipways, piers, jetties and more. This approach is supported by the current and emerging London Plan for example emerging London Plan Policy SI16 (waterways - use and enjoyment) specifically states that development plans should protect and enhance waterway infrastructure to enable water-dependent uses. This is also supported by the PLAs Thames Vision which includes the goal to see more goods and materials routinely moved on the river. These existing businesses make a vital contribution to the borough and must continue to be protected, in line with current adopted plan policy.
General comments relating to this topic area		
14	Mayor of London	With regards to office development Richmond should take note of Policy E1 of the Intend to Publish London Plan, which directs new office development to the borough's town centres and regard should also be given to Table A1.1 which sets out the office guidelines identifying those town centres with the greatest potential to accommodate different types of office development. It identifies Richmond major town centre as having high commercial growth potential and suitable for both speculative and mixed-use office development while Twickenham is identified as having potential for mixed-use office development. East Sheen and Teddington are identified as having existing small office capacities which should be protected. Richmond should clearly differentiate its approach towards industrial and office development.
19	DP9 Ltd on behalf of London Square Developments	What do we have to find out? - p. 32 We consider that intensification, co-location or storage and distribution use on the subject Site is inappropriate considering its poor access via residential roads and the potential for harm to the amenity of surrounding residents. Such development should be directed to suitable locations which benefit from greater logistical arrangements What do you think? – p. 33 In light of the SoS' response to the draft London Plan, the approach to protection of industrial uses requires further consideration. The findings of the LBRuT Employment Sites and Premises Study (2017) accurately reflects the significant site constraints that existing at the Greggs Bakery Site. We are confident that further studies that form part of the evidence base for the next Local Plan will reach the same conclusions and this should be reflected in the allocation of the site for residential use. Policy direction should be towards flexibility in relation to unviable employment land uses in areas inappropriate for continued use in order to meet strategic objectives such as housing delivery. Housing delivery is a pressing issue facing London, and in particular the Borough. The delivery of housing should therefore be a key priority in the new vision for the Local Plan. The use of Brownfield Sites for residential development should be a key policy aspiration which outweighs the need to protect inappropriate sites for continued employment use. This is a view that shared by the Planning Inspector in respect of the adjacent site at Lockcorp House which is also within the West Twickenham Cluster as outlined above.
27	Peter Willan, Paul Velluet and Laurence	We cannot be precise about our views on jobs in Central Richmond without the evidence the Council says it will be preparing. Richmond is attractive to international service companies such as PayPal and encouraging similar businesses to locate in Richmond is important.

Respondent reference no.	Name / Organisation	Detailed comments
	Bain on behalf of Prospect of Richmond	Encouragement of small businesses, start-ups and the like we believe is important.
Protecting what is special and improving our areas (heritage, culture and open land)		
Do you agree with the proposed policy directions?		
Of respondents who answered the question: 20 said yes, 2 said no, 1 both agreed and disagreed and 2 said don't know [13 did not answer the question]		
27	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond	<p>We believe the policies in the current Local Plan adequately cover the issues outlined below on Heritage, Culture and Protecting Open Space, and if further amplification is required we would suggest that it could be dealt with by subsidiary planning tools. We are concerned that the Direction of Travel seems to relax the controls that already exist and which are essential to maintaining the heritage, culture and green infrastructure and open land.</p> <p>Broadly we support the Direction of Travel on encouraging visitors and tourism. It is important that residents are supported in their efforts to maintain the heritage and culture of Central Richmond, the Riverside and the Green not only for their own benefit but for the wider community and visitors.</p> <p>As we say in para 33 above, promoting heritage and culture in the heart of Richmond should possibly be a prime objective, as some of the current uses of Central Richmond decline. This could involve the visual and performing arts and education in the arts. It would involve wider participation.</p> <p>The Riverside and the terraces are also a place for visitors and residents to relax and enjoy the scenic river Thames. [comments as in Heritage section]</p>
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	<p>We disagree that the Village Plans should be discontinued. These are based upon Neighbourhood Plans – and are very useful in ensuring the local population can contribute to how their town develop.</p> <p>There are also very useful for historic towns such as Twickenham and Richmond to have a whole town approach to managing their heritage rather than through conservation areas which fragment the approach (and in this borough most of the conservation statements are out of date). Without them we are disadvantaged compared to Ham & Petersham that have a full singing and dancing a Neighbourhood Plan. This is likely to result in other areas of the borough applying to create their own neighbourhood forums.</p>
28	Alice Shackleton on behalf of The Kew Society	We do not see a justification for altering the existing policies in the adopted Local Plan and are concerned that certain proposals (see our reply below in relation to development impact on character and or appearance of conservation areas) would water down such protections.
20	Gary Backler, Friends of the River Crane Environment.	<u>Green Infrastructure</u> : FORCE strongly supports the objective of protecting and where possible enhancing “The rivers, surrounding banks and green spaces, along with their biodiversity and wildlife.” We also welcome the recognition of “opportunities associated with new development to enhance access and to improve poorer quality areas such that they provide a wider range of benefits” (p38). FORCE is strongly in favour of investing to improve underutilised open spaces for public and environmental benefit, rather than taking their underutilisation as a cue to build on them.
37	John Waxman, Crane Valley Partnership	I would like to highlight that CVP and the Colne Valley Regional Park, working in association with environmental consultants ARUP, have recently produced the Colne and Crane Valleys Green Infrastructure Strategy. [This document, along with an associated interactive map, can be viewed online via: http://www.cranevalley.org.uk/news/post/Colne-and-Crane-Valleys-Green-Infrastructure-Strategy-published.html .] This strategy promotes the landscape-scale approach and lists a wide range of environmental enhancement opportunities. LBRuT was one of the strategy consultees. The Borough’s revised Local Plan should make reference to the strategy and should be aligned to it.
42	Jeremy Gill	No idea what you're talking about
48	Roger Wilson on behalf of Roger Wilson Consulting LLP	Promote walking, public transport and cycling. Stop use of cars and vehicles across the Borough.
68 (a)	Mark Jopling	Do more to protect the street scene in Victorian/Edwardian that are not BTM

Respondent reference no.	Name / Organisation	Detailed comments
69	Geoff Bond on behalf of Ham and Petersham Association	There is a significant risk, not mentioned, to increase the urbanisation of Conservation areas. This should be clearly and definitively controlled
<p>Are our current policies strong enough to ensure the ongoing protection of the borough's historic assets?</p>		
<p>Of respondents who answered the question: 5 said yes, 9 said no and 9 said don't know [15 did not answer the question]</p>		
3	Katie Parsons, Historic England	<p>As the Government's advisor on the historic environment Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the planning process. Therefore we welcome the opportunity to comment on the draft document these comments have been formed in line with the NPPF (2019) and with reference to draft New London Plan (At time of writing this is the Intend to Publish version (dated December 2019) available: https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/intend-publish-london-plan-2019) which will become part of the Borough's development plan when adopted. It is understood that the new Local Plan for Richmond borough will replace the current Local Plan and Twickenham Area Action Plan.</p> <p>The new plan is an opportunity to make real advancements in how the historic environment can be conserved or enhanced. This goes far beyond ensuring that wording complies with up-to-date national legislation and policy, but should be locally specific, detailed and aspirational while being realistic.</p> <p>The current policies are helpful but they can be strengthened and provide more guidance to applicants and decision makers. For example, heritage policies can do more to link conservation aims with maintenance activity, policies to tackle carbon emissions should make specific provisions as to how historic buildings can be retrofitted without making damaging fabric, and should highlight the risks of maladaptation than can cause a building to be less thermal effective; strong policies on the multifaceted benefits of green infrastructure and improvements that can be made to the historic environment through enhancing setting, improving access and enjoyment of heritage assets, and tackling flood risk which would help protect historic fabric etc. Looking at how policies can be improved demonstrates a positive, proactive strategy to conserve the historic environment. Policies should be revised over plan periods to reflect specific changes in development pressures and trends so we advise that up-to-date evidence is used. A good strategy will offer a positive holistic approach through the whole plan whereby the historic environment is considered not just as a standalone topic but as an integral part of every aspect of the plan, being interwoven within the entire document. The draft New London Plan advocates for a design-led approach to growth based on characterisation and understanding of local areas. We have commissioned several London-wide research report that would be helpful evidence sources for undertaking characterisation work:</p> <p>Characterisation of London's Historic Environment (LUC) – full report London's Local Character and Density (Allies and Morrison) – full report London's Image and Identity – Revisiting London's Cherished Views</p> <p>Conclusion We have produced a number of detailed Good Practice Advice and Advice Note documents that we recommend you review as part of your plan preparation process: The Historic Environment in Local Plan – Good Practice Advice in Planning 1 https://historicengland.org.uk/images-books/publications/gpa1-historic-environment-local-plans/ The Setting of Heritage Assets – Good Practice Advice in Planning 3 https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/ The Historic Environment and Site Allocations and Local Plans – Advice Note 3 https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/ In preparation of the forthcoming plan, we encourage you to draw on the knowledge of local conservation officers, the Greater London Archaeological Advisory Service, and local heritage groups.</p>

Respondent reference no.	Name / Organisation	Detailed comments
		<p>Finally, we should like to stress that this opinion is based on the information provided by the Council in its consultation. To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposal, which may subsequently arise where we consider that these would have an adverse effect upon the historic environment.</p>
5	Helen Monger, London Parks & Gardens Trust	<p>The London Parks and Gardens Trust (LPGT) is a member organisation of the The Gardens Trust (GT) and works in partnership with it in respect of the protection and conservation of registered sites, and is authorised by the GT to respond on GT's behalf in respect of planning consultations.</p> <p>LPGT contributed to the preparation of the 2018 Local Plan. Our comments were already made in the context that Outer London Boroughs would have to take considerable quantities of new development and that development should provide quality homes in attractive neighbourhoods with adequate provision of parks and open spaces for the mental and physical well being of the whole community. High density developments should still be well designed with access to parks and open spaces.</p> <p>We do not feel that these policies have had long enough to be applied/tested. These policies should be carried forward to ensure clarity for all new development proposals. Indeed, the revised context of the need for more housing and climate action calls for the protection and the enhancement of the quality of parks and open spaces whether designated heritage assets or not.</p> <p>We are aware that the government is instructing London to release industrial land for housing. This land is currently unlikely to have access to parks and open spaces, especially local green spaces. All new residential development must be within easy reach of well designed open spaces offering a variety of experiences and this should be provided in new residential areas.</p> <p>We look for local plan policies to carry forward principles already adopted eg Recognition of the value of both designated and non designated heritage assets Ensure investment in parks and open spaces via the development that contributes to its greater use. Taking care to avoid unintended consequences of development eg impact of views out from parks and open spaces and overlooking arising from tall buildings. Accessibility and functionality of parks and open spaces - increased densities mean a reduction in private amenity space, putting pressure on public space for activities and quite relaxation, policies should ensure easy access to a range of park landscapes. This is encapsulated in the adopted Local Plan in Para 8.3.6 & 8.4.10 " The borough's extensive provision of parks and open spaces enable local communities to lead lifestyles with greater levels of physical activity, resulting in better physical and mental health improvements, reduced stress levels and increased social interaction. These spaces provide a vital free resource in which people of all ages can play, exercise, relax and enjoy the natural world, so easy access for all residents to high quality open and natural space is important, particularly within identified areas of deficiency (see policy LP 31 in 8.4 'Public Open Space, Play Space, Sport and Recreation'). Parks and open spaces are particularly important in promoting activity in young children thereby targeting the increasing childhood obesity levels in the borough. Children's play space and outdoor 'green gyms' for use by the whole community are encouraged." "It is acknowledged that on-site provision may not be feasible or practicable for every major development site, but this will be assessed on a case-by-case basis, taking account of the existing open space provision relevant to the development site. Where it has been accepted by the Council that on-site provision cannot be made, the Council will expect existing surrounding open spaces to be improved, and where appropriate made more accessible to the users and occupiers of the new development. Financial contributions may be required to either fund new off-site provision, or improvements and enhancements of existing facilities, including access arrangements, in order to mitigate the impacts of new development." We wish the following policies to be carried forward Policy LP 1 Local Character and Design Quality, Policy LP 2 Building Heights, Policy LP 3, Designated Heritage Asset, Policy LP 4 Non-Designated Heritage Assets, Policy LP 5 Views and Vistas, Policy LP 12 Green Infrastructure, Policy LP 13 Green Belt, Metropolitan Open Land and Local Green Space</p>
14	Mayor of London	<p>Richmond's recognition of the importance of the Royal Botanical Gardens Kew as a World Heritage Site (WHS) is welcome and the WHS Site Management Plans should be used to inform Richmond's plan making process. Policy HC2 of the Intend to Publish London Plan should be noted and Richmond's Local Plan should require development proposals with potential to impact the WHS and its setting be accompanied by Heritage Impact Assessments.</p>
20	Gary Backler, Friends of the River Crane Environment.	<p><u>Heritage</u>: The borough's heritage is to be found not only in its conservation areas, royal parks and listed buildings, but in its historic industrial sites and watercourses. These should be protected and promoted at least as rigorously. This includes for example the formerly industrial landscape of Crane Park and the historic water features in the grounds of Kneller Hall. Note that the whole of the Crane corridor is an area of archaeological importance.</p>

Respondent reference no.	Name / Organisation	Detailed comments
22	Jimmy Wallace, Richmond Athletic Association	See comments below.
23	Peter Willan & Paul Velluet on behalf of Old Deer Park Working Group	See response below, set out in general comments relating to this subject area.
24	Paul Velluet	See response below, set out in general comments relating to this subject area.
27	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond	The Direction of Travel says: <i>'The borough's unique and locally distinctive natural, built and historic and cultural environment is highly valued, and we want to protect what is special and improve our areas for residents, businesses and visitors.'</i> We endorse this, especially in relation to Central Richmond, the Riverside and the Green. The Riverside and the terraces are also a place for visitors and residents to relax and enjoy the scenic river Thames. [comments as in Culture section] Central Richmond, the Riverside and the Green all need to be de-cluttered from unnecessary signage and signage needs to be made consistent across the area.
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	Will be much weaker without Village Plans and the protection will mainly be the fragmented conservation areas. Many of the Conservation Area Statements are too brief, whilst many of the studies are very old. This has been exploited by developers in some cases and thus they all need comprehensive reviews. We feel that Whitton High Street should become a Conservation Area; it is a classic interwar high street with an interesting mix of styles including the work of notable architects. Conservation Areas status would assist in retaining the architectural detailing and replacement (overtime) of inappropriate windows and signage.
28	Alice Shackleton on behalf of The Kew Society	If not, this could be dealt with by SPDs.
31	Tim Catchpole on behalf of MESS	The policies are strong but does the Council have sufficient resources to implement?
42	Jeremy Gill	Again I'm none the wiser from reading the above.
45	Sally Beeson	I don't think they are strong enough but hope they are!
46 (a)	Joan Gibson	I agree with all proposals, but am missing how we control visitor numbers and make sure visitors do not travel to attractions by car. LBRuT need to fix the public transport issues that mean Richmond has the highest percentage of people travelling by car to the Royal Parks (for instance).
48	Roger Wilson on behalf of Roger Wilson Consulting LLP	Promote walking, public transport and cycling. Stop use of cars and vehicles across the Borough.
52	Winston W Taylor	So far so good. But as the paper says a review is necessary to ensure this is the case.
64	Johanna Eschbach on behalf of Richmond Bridge Residents Association	It is proposed to identify further areas to protect but the borough is currently doing a poor job at protecting these areas currently. The focus should be on finding an efficient way to protect the current ones before looking expanding these areas. Indeed conservations areas, grade II listed building and buildings of township merit in East Twickenham are being completely ignored and current policies bypassed. For example: recycling centre and a bus stop being placed right in front of the only grade II listed building we have in the area. The new Lidl development site completely jars with the character of the area and has bypassed many planning policies despite being a protected area. In planning applications, conservation area policies are being ignored. There is also no budget allocated to maintain these areas. If the borough is trying to expand these, how can this be done in a meaningful way?
68 (a)	Mark Jopling	Need to be more responsive on NDHA
68 (b)	Mark Jopling	Need to be more responsive to NDHA directions and engaging with GLHER and HE on Planning matters
69	Geoff Bond on behalf of Ham and Petersham Association	BTMs can be demolished with impunity without permission it should be made easier to pursue those responsible

Respondent reference no.	Name / Organisation	Detailed comments
Do you agree that we should actively identify opportunities for development and/or redevelopment where these can result in improvements to the character and appearance of existing conservation areas?		
Of respondents who answered the question: 4 said yes, 18 said no and 0 said don't know [16 did not answer the question]		
22	Jimmy Wallace, Richmond Athletic Association	In relation to heritage, we welcome the proactive approach the borough suggests taking to identify opportunities for development that can result in improvements to the character and appearance of a conservation area, and more generally, the approach of ensuring that the emerging Local Plan policies will follow the approach outlined in National guidance as it relates to the requirement for development proposals to be assessed against the requirement to seek to avoid harm to heritage assets and the justification for the proposal. We are also in agreement with the suggested policy approach whereby the borough would actively identify opportunities for development and / or redevelopment where these can result in improvements to the character and appearance of existing conservation areas. We think this approach could also be extended in relation to other heritage assets such as listed buildings and parks.
23	Paul Velluet & Peter Willan on behalf of Old Deer Park Working Group	The Group questions the proposal for the Council to actively identify opportunities for development or redevelopment within conservation areas, such as the Old Deer Park Conservation Area, simply on the basis that 'where these can result in improvements to the character or appearance of conservation areas'. Such an approach is simplistic and premature, in the absence of a coherent, evidence-based study of each conservation area (using existing or updated Conservation Area Studies) identifying those buildings or features which detract from the character, appearance or significance of the conservation area, and where their development, subject to scale and design could serve to enhance the character and/or appearance of the area and sustain its significance.
24	Paul Velluet	I would question the proposal for the Council to actively identify opportunities for development or redevelopment within conservation areas, simply on the basis that 'where these can result in improvements to the character or appearance of conservation areas'. Such an approach is simplistic and premature, in the absence of a coherent, evidence-based study of each conservation area (using existing or updated Conservation Area Studies) identifying those buildings or features which detract from the character, appearance or significance of the conservation area, and where their development, subject to scale and design could serve to enhance the character and/or appearance of the area and sustain its significance.
27	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond	Central Richmond, the Riverside and the Green are all covered by Conservation Area Policies that protect and seek to enhance their heritage. We do not believe there is any case for relaxing the constraints on development in Central Richmond, the Riverside or the Green. The Green is an historic park of national significance with many listed buildings, and it is essential that it is not commercialised and that it remains distinct from its urban neighbour - Central Richmond - joined physically by the passageways from George Street. The Green's paramount use is for visitors and residents to relax and enjoy its relatively peaceful presence and historic surrounds. We note the Council proposes to review Conservation Areas, saying on page 35 of the Direction of Travel ' <i>particularly where there is pressure as well as opportunity arising out of development proposals, such as in Richmond town centre.</i> ' Apart from the House of Fraser re-development (whose increase in massing and height we continue to strongly oppose) we are not clear what other developments the Council has in mind.
28	Alice Shackleton on behalf of The Kew Society	No. We see no benefit to seeking out such opportunities – a review to update Conservation Area studies is one thing and is useful; but seeking out opportunities for development is a major risk as "improvements" may be subjective and ultimately detract from the CAs.
31	Tim Catchpole on behalf of MESS	Yes but again the Council must have sufficient resources
Are there other opportunities through planning to enhance the cultural offer and widen participation?		
10	Stuart Morgans, Sport England	Please see comments in Section relating to Social Infrastructure.
22	Jimmy Wallace, Richmond Athletic Association	We broadly support the approach outlined towards maintaining and enhancing the borough's culture. We note the identification of Twickenham Stadium and the Stoop (Harlequins) as major attractions for the continued use of the grounds for sports uses. Similarly, the Richmond Athletic Ground also has a current site allocation for ongoing sports use and we consider it to be equally important to the borough's cultural offer. Not only does the facility meet many of the day to day sporting

Respondent reference no.	Name / Organisation	Detailed comments
		needs of the community of all ages, it also hosts a number of important sporting and leisure-based events as outlined in our introduction to this letter. In our view, this highlights the importance of ensuring that facilities such as the Athletic Ground should continue to be identified as being of cultural significance to the borough and appropriate policies drafted to support its enhancement and evolution into a modern sporting and cultural facility of excellence.
23	Paul Velluet & Peter Willan on behalf of Old Deer Park Working Group	The Group suggests that there is scope to promote the cultural significance of the Old Deer Park for the benefit of both residents and visitors alike by identifying and celebrating its heritage and ecological interest, parkland character and accessibility as Richmond's 'Other Park'.
27	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond	See comments on value of cultural offer to Richmond above.
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	Need to identify areas in cultural deficit – much like you do with access to public open space. Then you would have more leverage to incorporate things like cinemas or galleries into large projects.
28	Alice Shackleton on behalf of The Kew Society	Possibly although it may be that this is better dealt with through financial assistance to relevant groups than through planning.
36	Tim Catchpole on behalf of MESS	In town centres. [Additional comment in response by email] Not just in town centres but also on major development sites.
41	Anthony Swan	Udney Park site
42	Jeremy Gill	Do you mean encourage more people to go to the theatre for instance? Probably yes.
44	Roger Cutler	Only if you properly listen to people & don't, as now, just ride roughshod over any objections you don't like.
45	Sally Beeson	I think you do a very good job already
46 (a)	Joan Gibson	For point 56. this cannot be used to justify building on green land - especially undisturbed and inaccessible green land
52	Winston W Taylor	The Borough needs more music venues to reflect its history in the R&B/Jazz/Rock area. Planning policy could reflect this and also stop things like the ludicrous threat to the Bulls Head in Barnes several years ago.
53	Richard Woolf on behalf of McDaniel Woolf Architects	We are 'very' fortunate to have such excellent cultural sites within the borough. We should also celebrate great 20th C and 21st C places and spaces, which tend to be over looked.
57	Tom Clarke, Theatres Trust	We are supportive of the plan's approach to widening participation in culture, and that the borough's theatres have been noted. These contribute towards the overall vibrancy of the borough, and the cultural well-being of local people. We would encourage the plan to suggest engagement with the Trust where developments proposing or impacting theatres come forward. Part of encouraging participation is protecting and supporting what already exists. As such the plan should have strong policies protecting existing facilities from loss, as are referenced within the Social and Community Infrastructure section.
58	Michael Atkins, Port of London Authority	Welcome reference in the Direction of Travel document to the Thames Policy area and the need for development proposals within the area to respect and take account of the areas special character.
63	Carol Rawlings	Support for Kew Gardens in order that it can continue its essential botanical research and preservation work and reduce the entrance fee, which disadvantages low income people. Appreciation of the natural world must be encouraged if we are to develop zero carbon plans to meet climate needs but currently the entrance fee is unaffordable for most people.

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69	Geoff Bond on behalf of Ham and Petersham Association	A reappraisal of the BTMs of Ham and Petersham as these were missed both in the Neighbourhood plan and the recent reassessment. There is no mention of Other Sites of Nature Importance. Protection from the introduction of urban features including signage into conservation areas should be clearly restricted.
Do you agree that the MOL and Green Belt boundary review should also incorporate a review of designated Other Open Land of Townscape Importance?		
Of respondents who answered the question: 14 said yes, 5 said no and 2 don't know [17 did not answer the question]		
14	Mayor of London	The borough is home to a substantial amount of MOL and to a lesser extent Green Belt. The Mayor is pleased that it is Richmond's intention to provide strong protection against inappropriate development in these areas in accordance with Policies G2 and G3 of the Intend to Publish London Plan. Please note the Secretary of State has issued Directions on Intend to Publish Policies G2 and G3.
17	Hannah Bridges, Spelthorne Borough Council	Spelthorne Borough Council is supportive of Richmond's approach to explore all options to meeting development needs, including the production of a Green Belt review to determine if any areas are not fulfilling their purpose. As mentioned in the consultation document, this will demonstrate at the examination stage that reasonable options have been considered, should exceptional circumstances exist. If land is to be released to help meet development needs, in line with the NPPF 2019 brownfield land and sustainable locations should be prioritised. If the decision is taken to review the Green Belt we would appreciate being notified of any implications for the strategic Green Belt that runs between Spelthorne and Richmond. We feel that it would be beneficial to hold a Duty to Cooperate meeting in due course to discuss Green Belt and other cross boundary issues as both authorities progress Local Plan preparation.
20	Gary Backler, Friends of the River Crane	[See earlier comments relating to green infrastructure] We note with concern that the Council are; "committed to carrying out a review of existing Green Belt, Metropolitan Open Land and Other Open Land of Townscape Importance to fully inform our spatial strategy and approach to growth and development in the borough." (p39) We are concerned that on this occasion, revised housing targets appear to be regarded as a legitimate test for the existence of "exceptional circumstances." Such an approach would appear to legitimise the challenging of Green Belt/MOL boundaries on any future occasion when housing targets or other development imperatives are adduced. We would oppose any de-designation of Green Belt and any development of Metropolitan Open Land which diminished the overall value, or potential value, of the open space network of the borough and did not, as a minimum, offer a compensating increase in open space quantum and open space protection elsewhere in the borough. We would also oppose any re-designation from Green Belt to Metropolitan Open Land, which would thereby enable development to be brought up to the very boundary of the re-designated space. We believe that any review of Green Belt, MOL and OOLTI should have, as an at least equal purpose, the consideration of how the quality of open spaces with such protections can be improved and managed to increase their public-welfare, environmental and ecological value. We would also like to see at least equal energy injected into a review of the obstacles and severance factors which prevent the physical joining up of current, near-adjacent open spaces of various designations into larger spaces; and of the obstacles to improved pedestrian and cycle connectivity between such open spaces, including land ownership. Our own survey data, assessing the way in which local communities engage with open spaces in the borough, demonstrates quantitatively the extent to which users of an open space seek to "join-up" their visits with visits to adjacent open spaces. This is particularly the case for visits which involve children; whereas other research shows that children in general are reluctant to engage with open spaces. Improving the links between open spaces, and resisting any loss of linkage caused by de-designation and development, is therefore key to engaging children in open spaces. The Council should be concerned about this as a matter for the health of future generations. ("Prevalence of obesity more than doubles between reception and year 6" p56 – "a preventable public health issue" p58).
22	Jimmy Wallace, Richmond Athletic Association	In relation to open land, we support the borough's intention to carry out a borough-wide review of Green Belt and Metropolitan Open Land. This is now also particularly relevant in the context of the Secretary of State's letter to the Mayor of London on 13th March in relation to the 'Intention to Publish version of the London Plan'. Specifically in relation to Green Belt, the Secretary of State has directed amendments to the emerging London Plan which are intended to bring it into line with the NPPF by ensuring there is reference to 'very special circumstances' that would make otherwise harmful development acceptable.

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		<p>A second important change that has been directed relates to local plan making where the suggestion changes is that <i>“Exceptional circumstances are required to justify either the extension or de-designation of the Green Belt through the preparation or review of a local plan.”</i> (our emphasis). This wording introduces the ability for Green Belt to be altered, either extended or de-designated. As made clear in the London Plan, the Metropolitan Open Land (MOL) is afforded the same status and level of protection as Green Belt so in this regard, it is entirely appropriate for the borough to carry out a review of such designated open land also.</p> <p>We support the acknowledgement that the reassessment of existing constraints is an important part of the plan process, focusing on whether designated open land still meets its purposes as outlined in the NPPF, London Plan and Local Plan. We agree that it is likely that the majority (but not all) of the existing land that is protected by these designations fulfils the policy requirements and criteria for ongoing designation. However, we do agree with the borough’s suggestion that there is potentially pockets of land that could benefit from a thorough assessment against the relevant policy criteria for designation. We discuss this in greater detail in our commentary on the ‘Call for Sites’ consultation below insofar as believe this applies to elements of the Richmond Athletic Ground site which have already been developed with existing buildings, car parking and hard landscape and as such can be argued as not meeting the necessary policy criteria for ongoing designation. We endorse the borough’s intention to run an open and transparent assessment of such areas of designated open land and the commitment to ongoing consultation both to agree the assessment methodology and in relation to site specific changes that might be suggested.</p> <p>To conclude on open land, we broadly support the policy directions as outlined on p.40 and we look forward to studying the detail of the emerging policies in due course. Similarly, we would like to be involved in the proposed Green Belt / MOL review process and look forward to submitting evidence to justify the partial release of some previously development parcels of the Richmond Athletic Ground site from the designations of protected open land.</p>
23	Peter Willan on behalf of Old Deer Park Working Group	<p>[First para following on from comments to the Introduction].</p> <p>1.12 However, the Group remains apprehensive that the stated commitment to carrying out a review of existing Green Belt, Metropolitan Open Land and Other Open Land of Townscape Importance (‘to fully inform our spatial strategy and approach to growth and development in the Borough’) to which reference is made on page 39 of the consultation document, and reflected in Questions 11 to 17 of the questionnaire, raises the considerable risk the potential de-designation of many, much valued open spaces of the Borough such as the Old Deer Park, as an unintended consequence of a simplistic search for growth.</p> <p>The Group supports the proposed review of the boundaries of Metropolitan Open Land, but only insofar as it will serve to provide scope for the Council to give proper consideration to adjustments in the boundaries of open land currently designated as MOL to embrace areas presently and anomalously excluded from such designation, such as those in the Old Deer Park – an issue on which the Group has repeatedly pressed in its submissions in response to consultation on the preparation of the present <i>Local Plan</i> and the present <i>Old Deer Park Supplementary Planning Document</i> and in earlier submissions. Copies of the Group’s submissions on this matter are attached. [See Appendix for Group’s earlier submissions]</p>
25	Phoebe Quayle	<p>The borough should not use Green Belt, protected Metropolitan Open Land or other valuable open green space for development of any kind. Richmond should instead make more efficient use of land to find space for housing and commerce.</p>
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	<p>Need to review all designations to make them as watertight as possible.</p> <p>There are some areas that could be added to MOL such as Hounslow Cemetery (which backs onto Hounslow Heath), Twickenham Cemetery, and the Heathfield Schools playing field.</p> <p>The actual Metropolitan Green Belt within the GLA area is now very thin – and the council should be careful not to confuse this with the home counties green belt. There is a green chain that runs from Whitton Dene, Twickenham Stoop, Kneller Gardens, Lincoln Avenue that acts as green belt separating the historical boundaries of Whitton from the rest of Twickenham. We feel this important ‘break’ in development should be more formally recognised and not just seen as part of the Crane Valley.</p>
32	Mark Jopling on behalf of UPPFT	<p>The Trust makes the following comments on the "Direction of Travel":</p> <ul style="list-style-type: none"> • Upgrade all LBRUT OOLTI locations to MOL, no need for LBRUT to have a separate local designation for protecting green space. • Protect all green space from inappropriate buildings in such strong terms as to dissuade all speculative schemes on green space

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35	Alice Roberts, CPRE London	<p>CPRE London is a membership-based campaigning charity concerned with protecting and enhancing London’s Green Belt, Metropolitan Open Land, parks, green spaces and green infrastructure, and achieving compact, green, urban communities to help prevent low-carbon sprawling development in the countryside.</p> <p>Green Belt and MOL Sites which are designated with the strongest protection in planning policy should not be allocated for development. Releasing and developing protected land neither necessary nor desirable. The Green Belt to the east of the borough is vital to ensure London does not sprawl into open countryside and so Londoners do not have to live with the devastating impact of urban sprawl i.e. high transport and energy costs, congestion and pollution.</p> <p>MOL is a strategic asset for all of London not just Richmond upon Thames residents. Furthermore, it is vital to ensure Londoners have access to open space and as an ecological asset delivering ecosystem services like urban cooling and water management; as well as providing vital habitat for diverse species.</p> <ul style="list-style-type: none"> • Green Belt / MOL reviews should only be conducted to assess whether the land meets the purposes and should not be used as a way to identify land for development. • Developments in Green Belt are high-carbon, car-dependent and rarely affordable (according to CPRE evidence). • There are clear alternatives for locating development within the borough – please see Annex 1 where we have suggested a number of large sites which could be redeveloped for residential, commercial or mixed-use neighbourhoods.
37	John Waxman on behalf of Crane Valley Partnership	The review of Green Belt, Metropolitan Land and Other Open Land of Townscape Importance linked with Theme 5 is concerning if there is an underlying risk that this could result in a net loss of green space and/or local shortages of wildlife refuges. The commitment to take a ‘transparent approach’ to that review is therefore welcome.
38	Justine Langford on behalf of Ham and Petersham Neighbourhood Forum	<ul style="list-style-type: none"> • The HPNF are concerned at the prospect of the review of MOL and OOLTI, which forms such a major role in Ham and Petersham and is its defining characteristic. Whilst there is justification for the review, H&P with its limited connectivity is not appropriate for major development which we have noted above should be located in areas with good public transport and sustainable transport infrastructure. There has been progress on some of the infill sites which were identified in the NP, for example at Cave Road/Riverside Drive, Craig Road and Maguire Drive/Dukes Avenue, and that is where attention should continue to be directed. • Nibbling away at designated protected areas would undermine public confidence in the strongly supported HPNP. For example the proposed loss of a strip of St Richards School Playing Fields with the apparent presumption that this could be simply compensated for by the provision of a MUGA would, we believe, contravene both the loss of OOLTI open space and the protection of character policies in the HPNP. There are lots of positive policy directions for improving green spaces and enhancing biodiversity which we can support, but not the loss of designated areas.
42	Jeremy Gill	What on earth does that mean?
44	Roger Cutler	It will only be used as an excuse to bring in other unpopular measures.
46 (a)	Joan Gibson	You should also stop seeing MOL as somewhere you can build on
46 (b)	Joan Gibson	MOL review must designate the whole of Heathfield Rec as MOL (including any extensions), and change the area to parkland.
52	Winston W Taylor	And why not?
53	Richard Woolf on behalf of McDaniel Woolf Architects	The definition of ' development ' in respect to open land is vague. We need management and conservation strategies for our open land and should look to the wonderful work by Thames Landscape Strategy and along the River Craine as being first rate examples of how to conserve open land and ensure it has meaning and purpose. We suffer in this borough with an unhelpful view that doing ' nothing ' is the best option. It is exactly the opposite. We must take our open land in our hands and maintain it , conserve it and make use of it. Every square inch of this borough has evolved.
63	Carol Rawlings	The green belt and other open land should be sacrosanct.
68 (a)	Mark Jopling	OOLTI is local designation, why isnt all OOLTI upgraded to MOL by default ?
68 (b)	Mark Jopling	OOLTI should by default re-classified at MOL, no need for a separate local classification
69	Geoff Bond on behalf of Ham and Petersham Association	this should not include very recent OOLTI designations added in the last plan, of which there are very few. These were only ratified after legal challenge earlier this year. It would seem odd to change these at this stage when it has been so vigorously and recently investigated.
Are there any sites that you would like to be identified for designation as ‘Local Green Space’?		

Respondent reference no.	Name / Organisation	Detailed comments
9	Shirley Meaker	lets hope udney park planning is reviewed by an intelligent body this time affordable housing is desperately needed as is the doctors surgery too much time has been wasted toing and froing green belt rubbish there is still plenty of playing field left for the schools as for residents thinking it will spoil their view hard luck were in comfortable houses plenty are not do the right thing for gods sake and let the plan go ahead
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	The triangle of grass on the Woodlawn Estate – at the junction of Lyndhurst and Chiltern Avenue could be turned into a pocket park. We also request that public open space designation is expanded to cover all of Heathfield Recreation Ground. There is a strip next to Heathfield School that is not covered.
31	Tim Catchpole on behalf of MESS	Yes, the Stag Brewery Playing Fields.
45	Sally Beeson	Udney Park Playing Fields Langham Road open space River towpaths and open space leading down to the Thames
46 (a)	Joan Gibson	Heathfield Recreation ground and it's future extension should have the highest level of protection you can give it - not all the site is designated MOL at the moment. This to guarantee the space in one of the poorest areas of Richmond with the most ill health and to ensure this land is NOT lost to local schools wanting to expand onto it. This land needs to be for the whole community.
47	Trevor Rowntree	I think Crane Park and the Shot Tower should be designated as a 'Local Green Space' and developed for the community
50	John O'Brien	Westerly Ware, Pensford Field, North Sheen Rec, Raleigh Road rec.
51	Su Bonfanti	I want to nominate Cambridge Gardens and Warren Gardens for designation as a Local Green Space, which holds particular significance and value to the local community. It is the only green space in our network of streets on the south of Richmond Road. It is the only remnant of one of the largest riverside estates in Twickenham belonging to Cambridge House, originally a Jacobean mansion standing on the east of the current Cambridge Road. It is therefore part of the chain of green spaces originally associated with important riverside estates from Syon House up stream to Ham House. Given its location, it also forms part of the amenity of Richmond Riverside, preserving open views on both sides of Richmond Bridge, as well as providing leisure facilities for local people. And Warren Gardens is the location of the memorial to the Belgian refugee community who lived in the area in World War
52	Winston W Taylor	Udney Park Playing Fields now have this status. I am not aware at this stage of any other sites.
53	Richard Woolf on behalf of McDaniel Woolf Architects	No
63	Carol Rawlings	Ham Village Green should be included in the list of designated village greens.
64	Johanna Eschbach on behalf of Richmond Bridge Residents Association	We want to nominate Cambridge Gardens and Warren Gardens for designation as a Local Green Space, which holds particular significance and value to the local community. It is the only green space in our network of streets on the south of Richmond Road. It is the only remnant of one of the largest riverside estates in Twickenham belonging to Cambridge House, originally a Jacobean mansion standing on the east of the current Cambridge Road. It is therefore part of the chain of green spaces originally associated with important riverside estates from Syon House up stream to Ham House. Given its location, it also forms part of the amenity of Richmond Riverside, preserving open views on both sides of Richmond Bridge, as well as providing leisure facilities for local people. And Warren Gardens is the location of the memorial to the Belgian refugee community who lived in the area in World War
68 (a)	Mark Jopling	The Council should have a LGS Policy and encourage communities to nominate sites. Likewise use the Asset of Community Value legislation where appropriate
68 (b)	Mark Jopling	The Borough through Village Planning should encourage LGS and ACV applications from the community. Both of these relatively new designations were missing in the original 2018 Local Plan consultations.
69	Geoff Bond on behalf of Ham and Petersham Association	Ham Library garden
General comments relating to this topic area		

Respondent reference no.	Name / Organisation	Detailed comments
14	Mayor of London	Richmond should ensure that its strategic and local views are protected in accordance with Policy HC3 of the Intend to Publish London Plan. Table 7.1 of the Intend to Publish London Plan identifies the King Henry VIII's Mound to St Paul's Cathedral linear view as a protected vista and this should be preserved by ensuring that it is clearly illustrated on maps and the borough's policies map so that it can be identified by developers and officers to enable the effective management of development in and around the view. The view should be managed by following the principles of Policy HC4 of the Intend to Publish London Plan. The importance of 3-D modelling through images and/or software should be noted as a valuable tool in this regard.
23	Paul Velluet & Peter Willan on behalf of Old Deer Park Working Group	In responding to questions 54, 55, 56, 57, 58 and 59 in relation to 'Heritage', 'Culture' and 'Green infrastructure and protecting open land', the Group can see no benefit or justification in seeking to amend, let alone dilute, the existing policies for the protection of local character, heritage assets (including listed buildings, conservation area and Registered Historic Parks and Gardens), views and vistas, the Royal Botanic Gardens Kew World Heritage Site, Metropolitan Open Land, trees, woodlands and landscape, social and community infrastructure, Public Open Space, Allotments, contained in the presently adopted <i>Local Plan</i> .
24	Paul Velluet	In responding to questions 54, 55, 56, 57, 58 and 59 in relation to 'Heritage', 'Culture' and 'Green infrastructure and protecting open land', I can see no benefit or justification in seeking to amend, let alone dilute, the existing policies for the protection of local character, heritage assets (including listed buildings, conservation area and Registered Historic Parks and Gardens), views and vistas, the Royal Botanic Gardens Kew World Heritage Site, Metropolitan Open Land, trees, woodlands and landscape, social and community infrastructure, Public Open Space, Allotments, contained in the presently adopted <i>Local Plan</i> .
29	Richmond Cycling Campaign	P36 (culture, open land, etc.) We would like all considerations in this area to include how people arrive at cultural destinations. For example, on match days at Twickenham, we should have a wider strategy that prioritises those who arrive by foot, by bike and by public transport. As a general rule, it should never be easier or more convenient to drive to our cultural destinations compared to walk/cycle/public transport options, and this should be embedded in policy. We would like to see plans for each of our cultural destinations which consider how people arrive there, capacity, etc., with planning for safe places for bike parking, and appropriate access for those who still need a motorised vehicle (for example blue badge holders). P40 uses the phrase "well served by public transport". We very much welcome this, but want to emphasise that it should specifically include walking and cycling access as well.
Increasing biodiversity and the quality of our green spaces, and greening the borough		
Do you agree with the proposed policy directions?		
Of respondents who answered the question: 20 said yes, 1 said no and 2 said don't know [15 did not answer the question]		
20	Gary Backler, Friends of the River Crane Environment.	FORCE welcomes the inclusion of this theme, and its prioritisation. The Local Plan should recognise (missing from pp41-42) the contribution that improvement to the borough's river channels and wetlands can make to tackling the climate emergency. We believe that all development proposals should carry a <i>mandatory</i> requirement to "enhance green spaces and green features" – elsewhere in the borough if such enhancement proves undeliverable on the site of the development. The "if possible" get-out (p42) should be removed. We would welcome the Council's "implementing a biodiversity net gain imperative" for all developments (p43). We welcome a review "identifying potential new SINC's for designation" (p43), and would be pleased to work with the Council to address obstacles to new such designations. We also support the proposal to customise the Urban Greening Factor model to LBRuT-specific criteria. (p44) The LB Richmond Biodiversity Action Plan is a document of key value and importance to the recognition and protection of the diverse habitats and species of the borough. It was completely updated in 2019 and is an ongoing collaborative enterprise with contributions from the council, community and private partners. The BAP needs to be adopted as a supplementary planning document for the plan and the values and targets of the BAP need to be integrated into the broader planning policy of the borough through the plan.
23	Paul Velluet & Peter Willan on behalf of Old Deer Park Working Group	In responding to questions 61 and 53 in relation to 'Increasing biodiversity and the quality of our green spaces and greening the borough', the Group supports the action points set on page 44 of the consultation document insofar as these are consistent with or simply amplify existing policies in the <i>Local Plan</i> . However, the Group can see no particular benefit or justification in seeking to amend the existing policies in the present <i>Local Plan</i> for the protection of designated sites and other areas of importance for biodiversity conservation; for safeguarding protected species and priority species, including those listed in local biodiversity action plans; for

Respondent reference no.	Name / Organisation	Detailed comments
		retaining and protecting existing trees; and for protecting green and open spaces, contained in the presently adopted <i>Local Plan</i> unless further refinement of those policies cannot be more effectively or speedily delivered through the preparation and adoption of one or more supplementary planning documents.
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	No mention of protecting existing green verges or promoting reinstatement. There is the potential of uncapping miles of tarmac verges and reducing pressure on drains. A freedom of information request in 2019 showed that the cost of mowing the grass was calculated the same way as parks – on a square meter basis. Many of our street trees are suffering because they are surrounded by tarmac – and this cause stress, and results in shorter lifespans compared to trees planted in parks. In the height of droughts this results in the release of large amounts of VOCs – and is thought by some scientific papers to greatly add to smog, please see the following links for further information https://www.sciencemag.org/news/2019/04/drought-not-just-about-water-it-affects-air-pollution-too https://www.frontiersin.org/articles/10.3389/ffgc.2019.00050/full
38	Justine Langford on behalf of Ham and Petersham Neighbourhood Forum	HPNF support the 'policy direction' to "Continue to ensure that the impact of large new development is assessed, so that the impact of additional burdens on existing facilities is mitigated", and look forward to this principle being applied and implemented in the redevelopment proposals for Ham Close.
42	Jeremy Gill	Self-evident
46 (a) (b)	Joan Gibson	I worry in this section that Richmond consider green areas which are not accessible by the public as less important than those our many visitors are degrading. You are justifying these can be built on. This attitude needs to stop – land which is dark and undisturbed is more valuable to wildlife than accessible areas. This is the subject of the climate emergency which explains how much wildlife we are losing in the UK and Globally, and you quote in the next section. The Local plan must reflect the climate emergency which has triggered this consultation.
52	Winston W Taylor	Broadly
64	Johanna Eschbach on behalf of Richmond Bridge Residents Association	We support the proposed policy directions, including developing a local Urban Greening Factor model, which relates to the specific issues here. We also support the expectation that all development should make a positive contribution; if small developments are let off the hook, that will cover much of happens here and it will be a big opportunity missed.
68 (a)	Mark Jopling	Yes though greater protection needed for grass Playing Fields. The Playing Pitch Strategy is a critical Planning document that speculators seek to exploit. Community sports clubs will be strained financially by the CV-19 impact, the Borough must do everything possible to dissuade speculators from trying to buy up distressed sports clubs.
69	Geoff Bond on behalf of Ham and Petersham Association	It is concerning that very recent OSNIs should be reviewed having only very recently been added and vigorously examined.
Do you agree with our overall policy directions for protecting and enhancing our biodiversity as well as recognising the contribution that green infrastructure and urban greening make to tackling climate change?		
Of respondents who answered the question: 21 said yes, 2 said no and 1 don't know [14 did not answer the question]		
22	Jimmy Wallace, Richmond Athletic Association	Biodiversity: We support many of the proposed policy directions as outlined on p. 44. Specifically given the functions of the Richmond Athletic Ground, we support the intention to have policy which encourages enhanced green and open spaces to provide a wider range of benefits for residents including improved public access and recreational facilities.
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	Need to recognise railway lines as habitat corridors and make them SINCS – in the way Hounslow Council has done. We note the Biodiversity Action Plan map misses out three large 'bat' sites in Whitton; Crane Park, Hounslow Heath, and Kneller Hall.

Respondent reference no.	Name / Organisation	Detailed comments
37	John Waxman on behalf of Crane Valley Partnership	<p>The Crane Valley Partnership (CVP) is an unincorporated association of public, private and third sector organisations that aims to:</p> <ul style="list-style-type: none"> • raise awareness and support action for conservation, restoration and new approaches to design and management of the river valley • help communities take a sustainable approach to managing and improving the River Crane and its tributaries • improve and protect the biodiversity of the area • maximise the use of the river corridor as a resource for healthier living and educational activities for local people • promote connectivity along the river corridor <p>For more information on CVP please see: www.cranevalley.org.uk</p> <p>Please note that London Borough of Richmond upon Thames is a member of CVP. I should also highlight that my comments do not present the collective view of the various partner organisations within CVP. Members of CVP will have their own perspectives on this consultation and will submit their own responses accordingly if they wish to engage in the consultation process.</p> <p>I have seen the detailed response to the consultation from Friends of the River Crane Environment (FORCE). I fully support and endorse the comments within that considered response [See respondent number 20]. Given FORCE's extensive local knowledge and strong community focus I would suggest that its views should carry considerable weight within this consultation.</p> <p>I will however take the opportunity to make some reinforcing points myself: LBRuT has declared a 'Climate Emergency' and must now act accordingly by ensuring that Local Plan policies are <u>fully aligned</u> with that declaration. There should be no anomalies or contradictions in the Borough's position. In this context, the Local Plan must recognise that the River Crane, the Lower Duke of Northumberland's River, the Whitton Brook and the open spaces along the river corridors are extremely valuable green infrastructure assets that need to be protected and enhanced so they can fully play their part in helping to mitigate the impacts of climate change.</p>
42	Jeremy Gill	How much did you pay people to write this?
44	Roger Cutler	The word "biodiversity" is made up & meaningless.
46 (a) (b)	Joan Gibson	<p>You are also using MOL and green land as cheap areas to build on. This has to stop – as listed before there is a huge amount of “efficient” rebuilding you can do on brown field sites to achieve building targets.</p> <p>The Local plan must state only the many brown field sites can be built on.</p>
46 (b)	Joan Gibson	<p>See also comments in section 'Increasing Biodiversity'</p> <p>Hedges are often more valuable as wildlife habitat and in reducing pollution. Along with trees you need to promote and plant hedges too. They are much more effective and sustainable than green walls which often never happen (Twickenham School plan had green walls which were never planted, and LBRuT have done nothing about). You need to only agree planning permission when the development is going to deliver green infrastructure that works and LBRuT will enforce.</p> <p>New developments should have a 30% tree canopy, very little grass lawn (could use alternative planting like yarrow which is more valuable to wildlife), hedges for borders (rather than fences), insect walls, and bird habitats.</p> <p>There is no justification for the “unavoidable” loss of wildlife habitat and the assumption that developments can be justified when removing habitat must be removed from the local plan.</p> <p>Undisturbed, inaccessible green areas must be given a higher protection on the bases of their value to wildlife.</p>
48	Roger Wilson on behalf of Roger Wilson Consulting LLP	Promote walking, public transport and cycling. Stop use of cars and vehicles across the Borough to help biodiversity.
50	John O'Brien	Include Pensford Field in this plan

Respondent reference no.	Name / Organisation	Detailed comments
58	Michael Atkins on behalf of Port of London Authority	Support the intention to enhance green and open spaces to provide a wider benefit for residents, including improved public access for all.
64	Johanna Eschbach on behalf of Richmond Bridge Residents Association	We would like to see more tangible ways for urban greening to be included in new developments sites and local town centres with the use of green walls and equivalent of CityTree
68 (a)	Mark Jopling	Needs to be stronger presumption against development of green space to deter the speculators who waste massive public resources trying to challenge the Local Plan
68 (b)	Mark Jopling	Should be much stronger on protecting green space and playing fields so any speculators don't try and fight the Council. Sports clubs will be vulnerable post CV-19 and the "vultures" may circle if they building on pitches in remotely possible
69	Geoff Bond on behalf of Ham and Petersham Association	Key here is preserving and developing green corridors
Do you agree that we should develop our own Urban Greening Factor model rather than relying on the generic London-wide model?		
Of respondents who answered the question: 13 said yes, 2 said no and 5 don't know [18 did not answer the question]		
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	We have an above average percentage green space because of Richmond Parks, Bushey Park and Hampton Court – and this may result in green models designed for the more urban central London having perverse results.
44	Roger Cutler	Provided you listen to people properly rather than put in what you feel they need.
45	Sally Beeson	Most definitely!
46 (a)	Joan Gibson	Absolutely not - you can adapt the London wide model but rewriting will miss points and is costly, and slow.
46 (b)	Joan Gibson	I do not agree you should develop your own greening model rather than using the London wide one as this is just wasting time and increasing cost. You should adapt the London wide model and make sure any adaptations work across borough boundaries.
51	Su Bonfanti	Your proposed policy directions, including developing a local Urban Greening Factor model, which relates to the specific issues here, sounds right to me. I support the expectation that all development should make a positive contribution; if small developments are let off the hook, that will cover much of happens here and it will be a big opportunity missed.
52	Winston W Taylor	Tend to yes but I would have to do more research. I have not seen the London-wide model
63	Carol Rawlings	Roof gardens and green walls should be developed.
68 (a)	Mark Jopling	Richmond should be leading London though the models should be London-wide
68 (b)	Mark Jopling	Lead London-wide not go-it-alone
Do you agree with the introduction of the biodiversity net gain requirement?		
Of respondents who answered the question: 17 said yes, 2 said no and 4 don't know [15 did not answer the question]		
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	Need to ensure green roofs are not over relied upon (they can turn out to be low value sedum matts) and that any wildlife corridors are wide, robust, and little light penetration.

Respondent reference no.	Name / Organisation	Detailed comments
44	Roger Cutler	Totally meaningless phrase.
46 (a) (b)	Joan Gibson	LBRuT are not trusted to protect our green land as you have already demonstrated you do not ensure all viable alternatives are used before agreeing to build on MOL for the THS development. I see nothing in this update or previous local plans which demonstrates you will protect our green infrastructure in the manner you think you are doing so already. The wording and agreements to protect green land with GLA and the government need to be stronger, and you need to commit to standing your ground rather than being afraid someone will overturn your planning decision. I am missing what you will do to ensure our many visitors travel to green sites without using cars, limit their damage to the green site, and desist from using the park as a car through route.
46 (b)	Joan Gibson	I totally agree on biodiversity net gain requirements. This should be assessed by independent LBRuT staff and not by consultants employed by the developer who will not get repeat business unless they prove what the developer wants to deliver. Currently LBRuT take the word of Developers when assessing impact on air quality, biodiversity and travel arrangements. This is (it is happening now) leading to developments which increase car traffic and decrease air quality. How you do this is to specify as a minimum: 30% tree canopy, hedges for fences, lawn areas to be yarrow (or some such plant), green roofs, bird and bat boxes, stag loggeries, insect walls, bath and shower water collection for watering, hard landscaping to be porous, car free developments (car park area can be used for wildlife).
52	Winston W Taylor	Not enough time to consider
53	Richard Woolf on behalf of McDaniel Woolf Architects	Before you define net gain , you have to establish a net loss. This can only be done if you survey what exists. We don't have any up to date survey information on much of the boroughs woodland and open spaces.
63	Carol Rawlings	Roof gardens and green walls.
General comments relating to this topic area		
27	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond	Green Infrastructure & Protecting Open Land The Green and the Riverside are key MOL assets and must be protected from development. In recent years small portions of MOL on the terraces of the Riverside have been occupied by a restaurant. This should not be repeated. There is pressure to commercialise the Riverside and this must be resisted. Access to the Old Deer Park from Richmond is important and needs recognition as such. Increasing biodiversity and the quality of our green spaces, and greening the borough It is important that the grass surface of the Green and the grass terraces by the Riverside are supported and not compromised. It is important that the trees around the Green and along the Riverside and elsewhere in Central Richmond are properly maintained. It is important the wild life on the Riverside and elsewhere in gardens is protected. We believe the policies in the current Local Plan cover the biodiversity issues adequately and if further amplification is required we would suggest that it could be dealt with by subsidiary planning tools.
29	Richmond Cycling Campaign	P44 - with regard to trees on our pavements, we draw the council's attention to recent discussions on how tree roots can damage pavements and make them impassable for those using (for example) walking frames or mobility scooters or chairs. We would like to see policy specify that pavement space will not be given to trees in this way, and that: a) Any new development will place trees into the space usually occupied by car parking, leaving clear, unobstructed pavements. b) A programme to reallocate car parking spaces to trees - using buildouts as appropriate - whenever trees are replaced or planted.
46 (b)	Joan Gibson	Need to stop people paving over their gardens. Their gardens can include porous car parking, and planting to ensure no net loss of biodiversity or water absorption. Pavements around new developments (and roll this out to the whole of Richmond) must include hedges to protect against pollution and flooding, and improve biodiversity.

Respondent reference no.	Name / Organisation	Detailed comments
		Additionally, LBRuT can green the borough by running a campaign to get gardens, patios etc. greened up. Tell people how to do it (even in pots), what to plant (native shrubs etc.) and how it will help their personal air quality.
Improving design, delivering beautiful buildings and high-quality places		
Do you agree with the proposed policy directions?		
Of respondents who answered the question: 17 said yes, 4 said no and 1 don't know [16 did not answer the question]		
22	Jimmy Wallace, Richmond Athletic Association	We acknowledge the various suggested policies directions for improving design and delivering high quality buildings and places. We look forward to reviewing the detailed policy wording as it emerges and we recognise the requirement for high quality design of new buildings and places to contribute to the beauty and character of the borough.
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	The council is planning on removing the Whitton & Heathfield Village Plan which will reduce the protection of the area against inappropriate development, because most of Whitton was developed in the inter-war years and has a very small percentage of properties protected by formal designations. Most of the Councils 'heritage' policies value Victorian and earlier neighbourhoods higher than interwar ones – and mechanisms like conservation areas won't be much use in areas like Whitton.
28	Alice Shackleton on behalf of The Kew Society	The explanation with the policy directions seems to indicate that there is already a substantive and substantial volume of appropriate policy, whether in the adopted Local Plan or in SPDs or other documents and acknowledges the value of these. This does not indicate a need for a review and new Local Plan but rather refining what currently exists. For instance, a tighter policy on siting of tall and taller buildings to protect the character of some town centres (e.g. Richmond) and out of town areas (e.g. Homebase, Manor Road) and potentially retail parks (such as Kew Retail Park) is needed.
42	Jeremy Gill	Got more important things to worry about and so should you.
44	Roger Cutler	Your plans for Twickenham Riverside are definitely not beautiful.
46 (a)	Joan Gibson	I agree with what you are doing and think LBRuT is good at ensuring our borough keeps its character. Aging population – possible to build high quality sheltered / monitored accommodation to entice people out of their large homes?
48	Roger Wilson on behalf of Roger Wilson Consulting LLP	Promote walking, public transport and cycling. Stop use of cars and vehicles across the Borough.
53	Richard Woolf on behalf of McDaniel Woolf Architects	I am very uncomfortable with a Richmond Borough Design Guide. The emphasis within this section is on ' history ' being the key issue, not quality . I am very uneasy with the current Governments direction of travel towards Classical Architecture being favoured over other forms of architectural design and even more worried that developments which express their facades in a ' classical ' manner will be granted planning in the mistaken view that they are more ' beautiful ' that others.
64	Johanna Eschbach on behalf of Richmond Bridge Residents Association	We support the preparation of a design guide for the borough, reflecting specific setting, character and history of different neighbourhoods. We would like any guide to recognise the importance of Richmond Road in East Twickenham as an approach to Richmond Bridge, one of the most important structures in the borough. We support the idea of embedding the Richmond Design Review that further. Although it seems unlikely that schemes in our area would be big enough to qualify, we hope there would be a trickle down from larger schemes, both in signalling to developers what is acceptable and in strengthening the hand of the Planning Committee.
How should the Urban Design Study identify areas for change and locations where tall buildings and/or high density development may be appropriate?		
20	Gary Backler, Friends of the River Crane Environment.	<p>FORCE welcomes the objective that “new buildings are well designed and contribute positively to the character of the townscape,” but we emphasise that new buildings must also contribute positively to the maintenance and improvement of the character of open spaces too: namely by reducing massing and visual intrusion into open spaces and, in particular, along the green corridors associated banks of the River Crane and the Duke of Northumberland’s River. FORCE believes that no such locations are suitable to accommodate tall buildings, and would welcome assurances that these would not be considered suitable for such locations by the application of the proposed “Urban Design Study” principles. (p47)</p> <p>We support “effective place making strategies” in principle. We believe that the borough’s open spaces are a key feature of “place” in the borough, for both residents and visitors. Our usage surveys, undertaken over seven years and at multiple locations along the River Crane and DNR, provide considerable insight into the connection of residents and visitors with these places; and we would be pleased to share our insights. We believe that these usage surveys are a critical insight into the current</p>

Respondent reference no.	Name / Organisation	Detailed comments
		public usage of open spaces, and the potential enhancement of this usage, and we would expect the council to be undertaking comparable surveys across the borough to inform its policies and strategies.
23	Paul Velluet & Peter Willan on behalf of Old Deer Park Working Group	In responding to questions 66, 67, 68 and 69, in relation to improving design, delivering beautiful buildings and high quality places, the Group can see no particular benefit or justification in seeking to amend the existing policies relating to local character and design quality, building heights, designated heritage assets, non-designated heritage assets and views and vistas, contained in the presently adopted <i>Local Plan</i> . The Group suggests that any further refinement of those policies could be effected by the preparation and adoption of one or more Supplementary Planning Documents, or by appropriate amendment to the published Borough-wide <i>Sustainable Urban Development Study</i> which already sets out an unduly relaxed and highly questionable approach to the development of 'tall buildings' close to Richmond Station and 'taller buildings' in the centre of Richmond. Insofar as reviewing and amending the existing <i>Study</i> , the Group urges that the potentially harmful impact of the development of 'tall' and 'taller' buildings on the Old Deer Park Conservation Area and its setting and on the adjacent part of the Richmond Riverside Conservation Area (which embraces part of the Old Deer Park) should be a major consideration.
24	Paul Velluet	In responding to questions 66, 67, 68 and 69, in relation to improving design, delivering beautiful buildings and high quality places, I can see no particular benefit or justification in seeking to amend the existing policies relating to local character and design quality, building heights, designated heritage assets, non-designated heritage assets and views and vistas, contained in the presently adopted <i>Local Plan</i> . I would suggest that any further refinement of those policies could be effected by the preparation and adoption of one or more <i>Supplementary Planning Documents</i> , or by appropriate amendment to the published Borough-wide <i>Sustainable Urban Development Study</i> which already sets out an unduly relaxed and highly questionable approach to the development of 'tall buildings' close to Richmond Station and 'taller buildings' in the centre of Richmond. Insofar as reviewing and amending the existing <i>Study</i> , I would urge that the potentially harmful impact of the development of 'tall' and 'taller' buildings on designated conservation areas and their settings and should be a major consideration.
27	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond	See also comments in Housing section. We oppose tall buildings and high density development in Central Richmond. At page 47 of the Direction of Travel document, it is stated that ' <i>We are considering undertaking an Urban Design Study which identifies local context and the locations in the Borough which have the capacity of development as well as their suitability for tall buildings</i> '. It remains unclear how such a proposed study relates to the Council's Borough-wide Sustainable Urban Development Study of September, 2008 and to its conclusions, to which reference is made at paragraph 4.2.2. in the present Local Plan. We very much hope that in reviewing the 2008 Study every opportunity will be taken to challenge the identification of the area around Richmond Station as offering 'the potential for "tall buildings"' and 'the centres of Richmond and Twickenham... where "taller" buildings may be appropriate'. ('Taller' buildings being defined as those being significantly taller than the neighbouring buildings, but less than 18 metres in height (below six storeys) and 'tall' buildings being defined as buildings of 18 metres in height or higher). We would suggest that nowhere within the boundary of the Central Richmond offers the scope for such developments.
28	Alice Shackleton on behalf of The Kew Society	Again, we ask why this is needed and why is the Council looking, apparently, to facilitate tall buildings and high density development (presumably of the sort provided by high rise blocks as in the Homebase, Manor Road, development). Such aspect of the Study must go in hand with identifying/specifying further areas where this is <u>not</u> appropriate, as present local policy LP2 seeks.
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	The main factor here is how connected they are to frequent public transport that can cope with extra passengers. It's also important to consider the timings of last services too. For example, the last train to Whitton from London Waterloo is known at the Cinderella Service as it leaves at 23.58 – which requires you to leave social gatherings in town earlier than anyone else. Maybe the council need to assess each town and look at the limitations – such time it takes to get to central London, spare capacity on the trains, bus routes or lack off, as this will help show what needs to be done to unlock the potential of areas.
31	Tim Catchpole on behalf of MESS	By focusing on the existing retail parks. Tall buildings are not appropriate in this borough.
41	Anthony Swan	Don't know. Tall building not so appropriate in this Borough
42	Jeremy Gill	They aren't.
44	Roger Cutler	LISTEN to the views of local people rather than profit-hungry developers, dubious quangos & out-of-the-area people who always get consulted but don't have to live with the end-result.
45	Sally Beeson	Only allow quality building to proceed which highlights our local character.

Respondent reference no.	Name / Organisation	Detailed comments
46 (a)	Joan Gibson	Places you can build more high rise are above large supermarkets – Rugby Road, Hampton and business park buildings etc. etc. Town centres such as Twickenham.
49	Margaret Edwards	The issue with many tall buildings is that they create wind tunnels at street level. This is already noticeable outside the new Twickenham station concourse. It makes it less attractive as a walking route and dangerous for less able people. Tall buildings also screen out sunshine and reduce daylight at street level - to be avoided in town centres and where other housing is low level. High density can work in town centres where access to facilities and green space is good.
52	Winston W Taylor	I would need to talk to planners, architects etc to answer this. Perhaps a good exercise for a degree level student in town planning or architecture to research.
53	Richard Woolf on behalf of McDaniel Woolf Architects	As Richmond continues to reject higher density construction I'm afraid we'll have to have this policy dictated to us by the Inspectorate and the Major of London.
55	Jon Rowles	The most important factor will be access to train stations with a metro turn up and go service.
64	Johanna Eschbach on behalf of Richmond Bridge Residents Association	Conservation areas or areas with grade II listed buildings should be excluded. Also, where tall buildings might jar a view of particular merit.
69	Geoff Bond on behalf of Ham and Petersham Association	Where they fit the local character of the wider area and the related infrastructure (transport, schools and healthcare) will not be overloaded.
Should design review be embedded as one of the policy tools to inform determination of planning applications?		
Of respondents who answered the question: 21 said yes, 0 said no and 2 don't know [15 did not answer the question]		
23	Paul Velluet & Peter Willan on behalf of Old Deer Park Working Group	In relation to the proposed increase in the use of design review and its potential involvement in proposed developments in and around the Old Deer Park, the Group believes this should no longer be a process carried on 'behind closed doors'. Instead, it should be undertaken on a much more open and transparent basis. Whilst planning officers and members of the applicants' team are allowed to attend and participate in dialogue with members of the Richmond Design Review Panel, others, with the exception of local councillors who may have a particular interest in the proposals are not allowed to attend. Such a situation appears to be in conflict with the role of the Review Panel in the public interest. It is noted that unlike the Council's former Conservation Areas Advisory Committee, the majority of the members serving on the Panel have no direct association with Richmond, nor have any declared special knowledge or understanding of its history, architecture, landscape and character, let alone, its conservation areas. Such a situation would suggest that the scope for the Panel to contribute usefully and effectively to the planning process in relation to proposed developments in the Old Deer Park and nearby may be limited. For many years right up until the present, the real problem in relation to issues such as the design of new development, the design of alterations and extensions to existing buildings and the design of urban spaces, has been the tendency of the Council in its decision-making to approve proposals that are demonstrably inconsistent with its own adopted policies, guidance and planning-briefs, as so clearly reflected in the recent decisions to approve the proposals for the Stag Brewery Development at Mortlake – without consultation with the Council's own Design Review Panel – and the proposals for the House of Fraser Development in Richmond.
24	Paul Velluet	In relation to the proposed increase in the use of design review and its potential involvement in proposed developments, I believe this should no longer be a process carried on 'behind closed doors'. Instead, it should be undertaken on a much more open and transparent basis. Whilst planning officers and members of the applicants' team are allowed to attend and participate in dialogue with members of the Richmond Design Review Panel, others, with the exception of local councillors who may have a particular interest in the proposals are excluded from attendance. Such a situation appears to be in conflict with the role of the Review Panel in the public interest. It is noted that unlike the Council's former Conservation Areas Advisory Committee, the majority of the members serving on the Panel have no direct association with Richmond, nor have any declared special knowledge or understanding of its history, architecture, landscape and character, let alone, its conservation areas. Such a situation would suggest that the scope for the Panel to contribute usefully and effectively to the planning process in relation to proposed developments may be limited. For many years right up until the present, the real problem in relation to issues such as the design of new development, the design of alterations and extensions to existing buildings and the design of urban spaces, has been the tendency of the Council in its decision-making to approve proposals that are demonstrably

Respondent reference no.	Name / Organisation	Detailed comments
		inconsistent with its own adopted policies, guidance and planning-briefs, as so clearly reflected in the recent decisions to approve the proposals for the Stag Brewery Development at Mortlake – without consultation with the Council’s own Design Review Panel – and the proposals for the House of Fraser Development in Richmond.
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	Need to engage local communities in the plan making process earlier on. Often the Council has a planning performance agreement where officers give pre application advise – need to have some form of community engagement at this early state of the process. The council also needs to improve transparency and add to the public planning file and add the formal pre-application advise it gives. Some councils already do this, and it helps to provide confidence in the planning system.
28	Alice Shackleton on behalf of The Kew Society	Whether design review should be embedded must depend greatly on the structure, membership and openness of the Design Review Panel and its involvement. If members were required to have detailed local knowledge and if its participation in planning applications with the applicants was open to other interested parties as well as the applicants, it could be useful. Another tool perhaps could be the involvement of local amenity societies in the design review. These have the necessary detailed knowledge and connection to their areas.
31	Tim Catchpole on behalf of MESS	Yes, and it should have been done for the Brewery development.
41	Anthony Swan	Environmental ie amount heating etc required
42	Jeremy Gill	Will it fall down after thirty years. Will people be burned alive in it if there's a fire.
44	Roger Cutler	The ears to listen & take in local peopls' views. Most notably the views of people who live there who will be stuck with the end result.
45	Sally Beeson	New buildings should try and blend in with the local architectural style if there is any nearby
46 (a)	Joan Gibson	Not sure what a design review is - but currently LBRuT are agreeing to designs and layout which are not the optimum due to viewing that this is the responsibility of the developer and the developers offer has to be agreed.
48	Roger Wilson on behalf of Roger Wilson Consulting LLP	All developments must be holistically carbon neutral - else they could be subject to legal challenge re Paris COP objectives, as per Heathrow third runway.
51	Su Bonfanti	I like the idea of embedding the Richmond Design Review further. Although it seems unlikely that schemes in our area would be big enough to qualify, I hope there would be a trickle down from larger schemes, both in signalling to developers what is acceptable and in strengthening the hand of the Planning Committee.
52	Winston W Taylor	Consultation over large developments such as Twickenham riverside.
55	Jon Rowles	Need to have more 'verified' images as some of the CGG images are very misleading.
63	Carol Rawlings	The need for greater biodiversity and the greening of our towns through green walling, planted roofs and balconies.
Should we develop our own borough-wide design guide to assist delivering high quality design, and what are the local areas' qualities and opportunities?		
23	Paul Velluet & Peter Willan on behalf of Old Deer Park Working Group	Anomalously, questions are posed about whether the Council should adopt its own Borough-wide design guide to assist in developing high quality design and what are the local areas' qualities and opportunities. The Group notes that the Council already has a very sound <i>Supplementary Planning Document – Design Quality</i> , adopted in February, 2006, and a very sound <i>Public Space Design Guide</i> , adopted in January, 2006, and can see no reason why either or both documents cannot be modestly updated insofar as is necessary. Similarly, the Group notes that the Council has published and adopted a series of no less than 13 <i>Village Plan Supplementary Planning Documents</i> , 56 <i>Conservation Area Studies (SPDs)</i> and 85 <i>Conservation Area Statements</i> , over past and more recent years – together with other documents such as the <i>Old Deer Park Supplementary Planning Document</i> of March, 2018. The Group notes that these documents already identify the local areas' qualities and opportunities, and can see no reason why they cannot be modestly updated insofar as is necessary.
24	Paul Velluet	Anomalously, questions are posed about whether the Council should adopt its own Borough-wide design guide to assist in developing high quality design and what are the local areas' qualities and opportunities. In this connection, I note that the Council already has a very sound <i>Supplementary Planning Document – Design Quality</i> , adopted in February, 2006, and a very sound <i>Public Space Design Guide</i> , adopted in January, 2006, and can see no reason why either or both documents cannot be modestly updated insofar as is necessary. Similarly, I note that the Council has published and adopted a series of no less than 13 <i>Village Plan Supplementary Planning Documents</i> , 56 <i>Conservation Area Studies (SPDs)</i> and 85 <i>Conservation Area Statements</i> , over past and more recent years – together with other documents such as the <i>Old Deer Park Supplementary Planning Document</i> of March, 2018. I note that these documents already identify the local areas' qualities and opportunities, and can see no reason why they cannot be modestly updated insofar as is necessary.

Respondent reference no.	Name / Organisation	Detailed comments
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	Yes, but this will need to have another tier to reflect the distinctiveness of each town that makes up the borough. Whitton's main quality is that most of the roads and estates were planned and incorporate many green spaces and verges – giving the area a feel that is much lower density than it actually is.
28	Alice Shackleton on behalf of The Kew Society	A comprehensive design guide to incorporate existing SPDs on design quality, Conservation Area statements, Village Plans with the character areas, is possible within the adopted Local Plan scheme by amending as appropriate.
31	Tim Catchpole on behalf of MESS	The Village Plan studies in 2016 were surely the makings of Design Guides?
41	Anthony Swan	If it doesn't exist in this Country or as USA standards
42	Jeremy Gill	No and I haven't the faintest idea. You decide.
44	Roger Cutler	Only if it takes into account the views of the local resident which is rarely the case.
45	Sally Beeson	Yes most definitely!!!!
46 (a)	Joan Gibson	Use of pocket parks to give areas of good biodiversity (trees, hedges, flowers) with seating so people can walk a short distance to get outside and sit / chat. Park sheds and Pavilions and unused shops to be upgraded to run local workshops – music, art, knitting, baking etc. etc. Seating stops on the way to town centres to encourage active travel. Infrastructure such as schools, NHS, dentist etc. to be local. Ensure parks have the right play areas. Teenager clubs in park pavilions to hang and play table tennis etc. An awareness we need to make our designs greener and fuller of wildlife habitat so they will need to look different to the area. This needs to be added as an objective in the plan.
48	Roger Wilson on behalf of Roger Wilson Consulting LLP	Yes
51	Su Bonfanti	I think the preparation of a design guide for the borough is essential, reflecting specific setting, character and history of different neighbourhoods. Any guide should recognise the importance of Richmond Road in East Twickenham as an approach to Richmond Bridge, one of the most important structures in the borough.
52	Winston W Taylor	Yes. As for qualities and opportunities, not enough time to consider
53	Richard Woolf on behalf of McDaniel Woolf Architects	Only if we see this as an issue of quality over style ... I'm uncomfortable with an historic architecture becoming the narrative, rather than an appropriate response to site, context and function.
55	Jon Rowles	Yes, but it should be done in a way where it can be updated outside of the local plan process.
56	Rob Kennedy, Environment Agency	Yes
58	Michael Atkins, Port of London Authority	Yes, it is considered this should include specific guidance for riverside developments in the borough.
59	Paul Massey	Yes as Richmond is a very special borough providing much needed open space for the residents of Richmond and beyond
61	Tom Minns	Yes
63	Carol Rawlings	Yes and it should be in keeping with the local areas including adequate space for biodiversity.
64	Johanna Eschbach on behalf of Richmond	Yes but within the borough there are different areas which might warrant these design guides to be adapted (e.g. leveraging shopfront traditions from Richmond Rd).

Respondent reference no.	Name / Organisation	Detailed comments
	Bridge Residents Association	
Do you have any views as to how the design and development of homes could address different lifestyles, abilities and stages of life, including an ageing population?		
27	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond	There is an ageing population and a requirement to comply with the Equalities Act. This is important for reasons of access to buildings and the sustainability of many to undergo changes (lifts and level access for example) so that there is equal access for all as required by the Act. Many of the Central Richmond buildings simply cannot be adapted to new uses and comply with current Building Regulations (the folly of not doing so - Grenfell). So although A1 to A3 use may be thought straightforward it is not and a blanket A3 use along George Street would not work safely.
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	You could have a system where a percentage of units have to address the needs of different groups, such as a percentage of units suitable for elderly people, studio / home workers, for families – so that large sites have a broader mix of units than what often gets delivered. Some people do not drive – and new developments should also cater for them, rather than making them pay extra for parking spaces they will never use. Need to investigate if parking standards should be amended so that only X percentage of houses need to have car parking.
28	Alice Shackleton on behalf of The Kew Society	An important consideration must be to develop homes that accommodate different demographics within a community. If, for example, the residential element of town centres is devoted to small one and two bedroom flats appealing to younger working age people, it is difficult to see how a vibrant inclusive community would result. There must be a range of types of home, from the example of co-working mentioned earlier, small flats catering for working age people but also those for older people who may need support too, and larger flats and houses for families. There must be green space (not just on the roof!) for health of all groups. The importance of there being life in the community during the day as well as evening and weekends is vital. The need for affordable housing for young people (currently being met by densification) must not override considerations that make a vibrant community.
31	Tim Catchpole on behalf of MESS	It is important that homes are adaptable for lifelong living, e.g. for the elderly to live on the ground floor, etc.
41	Anthony Swan	Don't know. Probably!
42	Jeremy Gill	More homes for the increasing single population
44	Roger Cutler	Yes. Ask & listen.
45	Sally Beeson	I think there needs to be huge research into where our local ageing population would like to live. If there were good quality housing for them with maybe a warden on site, then they wouldn't feel the need to stay in their homes which are probably larger than their present needs. I am sure that many people would like to leave but see nothing to suit their lifestyle. Houses then would be possible for families with children.
48	Roger Wilson on behalf of Roger Wilson Consulting LLP	Promote walking, public transport and cycling. Stop use of cars and vehicles across the Borough.
49	Margaret Edwards	I have already covered this in earlier responses. Extra care housing is a priority, intergenerational housing, reduced street clutter. Changes in Richmond Town were very good but Richmond station has not set down space at front and does not provide visual clues for access into station and from station to bus stops, taxis, shops, car park etc. Seating in Twickenham is good addition, Richmond and Teddington don't have as much.
52	Winston W Taylor	Not at this stage.
53	Richard Woolf on behalf of McDaniel Woolf Architects	This is a Building Regulations matter. I agree whole heartedly with the need for adaptive lifetime homes for all age groups.
55	Jon Rowles	- Need more starter homes (i.e. one double with a single bedroom) rather than the two double bedroom flat for the buy 2 let market. - More artisans flats - ie studio space attached - housing for older people should be near town centres where possible
56	Rob Kennedy, Environment Agency	No

Respondent reference no.	Name / Organisation	Detailed comments
63	Carol Rawlings	There should be a requirement for all flats to incorporate balconies where residents can grow plants and food. Homes for older residents or people with mobility problems should incorporate lifts and balconies with raised beds.
64	Johanna Eschbach on behalf of Richmond Bridge Residents Association	A holistic approach is needed which also includes how design can help reduce environmental and noise pollution as these issues are likely to increase over time.
68 (b)	Mark Jopling	Yes - end the distinction in CIL payments between C2 and C3 which distorts the market.
General comments relating to this topic area		
27	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond	We have stressed the importance of the built environment to the future of Richmond and would be concerned with any potential relaxation of the high standards of design required under the policies in the present Local Plan. [section about compliance with Equalities Act and Building Regulations above] We believe the policies in the current Local Plan covers design issues adequately and if further amplification is required we would suggest that it could dealt with by subsidiary planning tools.
Reducing the need to travel and improving the choices for more sustainable travel		
Do you agree with the proposed policy directions?		
Of respondents who answered the question: 18 said yes, 8 said no and 1 don't know [11 did not answer the question]		
1	David Mattes	<p>What I have to say may be controversial and not very PC but I believe it represents the views of a large number of residents and businesses in Richmond and therefore should be taken into account.</p> <p>Your draft plan laudably aims to encourage sustainability in travel/transport and to discourage use of private vehicles where possible. However:</p> <p>A great number of businesses in the borough rely on road transport for their supplies and to deliver to their customers.</p> <p>A great number of residents enjoy – and place a high value on – using their cars for social as well as business purposes.</p> <p>A smaller number of residents use their cars as an essential (ie: the only) link to family and friends, eg: the elderly and disabled people.</p> <p>With the increase in online ordering comes an increase in business vehicles delivering to homes and also to small businesses.</p> <p>The position of the borough, just south of the River Thames, means that many journeys by both business and personal vehicles are to and from places north of the river; and there are a limited number of road and rail bridges, several of which are often 'out of action' for long periods or have limited access because of ongoing work.</p> <p>Traffic jams in the borough are already at an unacceptable length, both of frequency and of length of delay.</p> <p>Therefore, the Council is faced with two diametrically opposite objectives: 1) To reduce traffic and make road use and other travel more sustainable; and 2) To improve traffic flow and to make homes, shops and other businesses more accessible by cars and delivery lorries.</p> <p>The current draft appears to address 1) but to ignore 2). Instead it should be aiming to solve this paradox or at least to achieve an acceptable balance between these two objectives.</p> <p>What is an 'acceptable balance'?</p> <p>The answer to this question will undoubtedly be controversial.</p> <p>My own view is that we should aim to eradicate – or greatly reduce – the worst effects of both options. Having done that, we should then aim to bring in measures that provide the greatest benefits of both options. Only after that should we consider tweaking any of the 'in between' measures. Do you agree?</p> <p>I wouldn't presume to say what are the best and worst of each of the two objectives; but I think it would be helpful if the Council were to set up panels or committees to do that, as a first step before recommending the best and most practical balance between them that would suit the business, social and residential demography of the borough.</p>
12	Tim Lester	Please see comments below.
13	Heather Archer, Highways England	Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such Highways England

Respondent reference no.	Name / Organisation	Detailed comments
		<p>works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity. Highways England will be concerned with proposals that have the potential to impact on the safe and efficient operation of the SRN.</p> <p>In the case of the area covered by the London Borough of Richmond, although there is no SRN within the borough boundaries, it should be noted that the M4 is located approximately 6km to the north of the borough and the M3 is located approximately 5km to the south west. Both the M3 and M4 are heavily congested throughout the peak hour periods and any material increase in traffic on this section of the SRN would be a concern to the Highways England.</p> <p>In spatial planning and development control terms, we have a duty to safeguard the operation of the SRN as set out in the DfT Circular 02/2013 (The Strategic Road Network and the Delivery of Sustainable Development). The circular encourages Highways England to work co-operatively with Local Planning Authorities within the framework of the Government's policies for planning, growth areas, regeneration, integrated transport and sustainability.</p> <p>We are a key delivery partner for sustainable development promoted through the plan-led system, and as a statutory consultee we have a duty to cooperate with local authorities to support the preparation and implementation of development plan documents. Highways England is aware of the relationship between development planning and the transport network, and we are mindful of the effects that planning decisions may have on the operation of the SRN and associated junctions. We cannot be expected to cater for unconstrained traffic growth generated by new developments, and we therefore encourage policies and proposals which incorporate measures to reduce traffic generation at source and encourage more sustainable travel behaviour.</p> <p>Local Plan Direction of Travel Consultation</p> <p>It is noted that Highways England and the SRN have not been referenced within the Local Plan Direction of Travel Consultation document. Highways England should be consulted on any development that may have an impact on the M3 and the M4 which are the closet points of the SRN to the London Borough of Richmond. The document makes reference to a reduction in the availability of parking and a desire to embed car-free or car-lite developments within the borough, which would likely reduce the impact of such developments on the SRN. However, it should be ensured that we are consulted prior to submission of the updated plan for examination, to enable us to make an informed decision as to the soundness of the plan at the appropriate time.</p>
15	Transport for London	See comments above.
27	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond	<p>Walking and cycling can be enjoyable and provide the benefit of exercise. We suggest walking and some cycling should be the principle mode of travel within Central Richmond, along the Riverside and around the Green. There already exists the riverside cycle route. It is important to take account of any adverse impact from cycling in the area largely set aside for walking. Through-traffic should be directed away from Central Richmond and the Green but we recognise that for the foreseeable future there will be a need for traffic along George Street and that pedestrianisation is not an option given the displacement around the Green and to other areas of Richmond.</p> <p>Cars emit carbon and air pollutants and the Direction of Travel seeks to reduce these as does the current Local Plan. During the life time of the current Local Plan zero emission cars could represent a significant proportion of the car fleet. But the DfT's current consultation on Transport De-carbonisation projects vehicle km to increase between 2020 and 2030 by around a 15% and associated carbon emissions to reduce by around 25%. These are UK wide statistics. Based on these figures, road congestion and carbon seem likely to remain issues through the life of the current Local Plan.</p> <p>We believe it important that planning takes on board electric charging of cars at scale.</p> <p>We support modal shift to public transport.</p> <p>Notwithstanding the direction of travel outlined, we do recognise that residents and visitors with zero emission vehicles should not be unduly inconvenienced with a reduction in visitor and resident car parking capacity.</p> <p>We believe the policies in the current Local Plan cover the travel issues adequately and if further amplification is required we would suggest that it could dealt with by subsidiary planning tools.</p>
29	Richmond Cycling Campaign	<p>P48 and onwards - Need to travel / sustainable travel</p> <p>We welcome the analysis and thrust of this section. In our view, there is now a much clearer understanding in the council than we have previously experienced of the importance of active and sustainable travel options.</p>

Respondent reference no.	Name / Organisation	Detailed comments
		<p>Given the related policy frameworks, from the mayor, but also from the Government, we believe that the council needs to be more aggressive in its pursuit of mode share changes, for both environmental and public health reasons.</p> <p>In this section we would like to see some more detail, and some more concrete objectives that will help to deliver sustainable travel - the elements so far do an excellent job of identifying all the different things which are needed to make these goals a reality, but we would suggest inclusion of elements like:</p> <ul style="list-style-type: none"> • A plan to offer low traffic neighbourhoods across the borough • A commitment to offer cycle hangars on every road by 2026 • Provide safe, pedestrian priority crossing points on every road in the borough (whether zebra, toucan, etc.) • Implementation of school streets for every school in the borough by 2025 • Design and maintain publicly shared plans to provide everyone with a safe cycle lane within 400m of their home by 2030, and 200m by 2035 • Create a working group with town centre businesses to set up last mile transport hubs, shared deliveries, and other identified schemes to reduce and coordinate deliveries • Work with 'car club' organisations and groups to see if there are opportunities for closer working, to speed the reduction in car ownership in the borough.
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	<p>There needs to be two approaches to cycle lanes – we need through routes for people commuting long distances, e.g. into London. But we also need spokes of shorter cycle routes from town centres into their catchment areas to encourage more people to switch to bikes for short journeys into their local high street. Many existing cycle routes have missing signs, badly faded signs, no road markings, and can be in places almost invisible – such as the one that runs along Whitton High Street. The council need to audit the existing cycle routes and put in place a program to bring them up to an acceptable standard. Many cycle lanes are interrupted by crossing build outs which force cycles into the path of traffic – such as outside Twickenham School.</p>
31	Tim Catchpole on behalf of MESS	Yes, but more needs to be said about the role of the CPZ in making people pay for the use of the public realm including higher payments for additional cars.
39	Solomon Green	Large residential areas of the borough contain dwellings that are more than 800 meters from public transport and/retail. Elderly and disabled cannot ride bicycles or are unsafe on them. they rely on cars. Any proposal to reduce car ownership and usage would only lead to more elderly and disabled being trapped in their homes or, for those who could afford, making more use of uber and other hire cars as well as food deliveries. The latter already clog some many streets when delivering thereby adding to exhaust pollution..
42	Jeremy Gill	Disagree that you can plan this
44	Roger Cutler	The advent of green battery cars makes it unnecessary to reduce car usage.
46 (a) (b)	Joan Gibson	I like your focus on car-lite developments which have only delivery, disabled and car-club facilities only. Good public transport must also be available.
56	Trevor Rowntree	I disagree with CPZs. We should be able to park our cars close to amenities. Not having park spaces encourages people driving around to locate a parking space. This in turn causes more congestion and higher emissions.
48	Roger Wilson on behalf of Roger Wilson Consulting LLP	We should Promote walking, public transport and cycling., and stop use of cars and vehicles across the Borough.
50	John O'Brien	Deliberately making car travel unpleasant is not a good approach. There are still many traffic issues that could be solved by the plan which would improve driving experience and reduce wasted time in jams. You should give maximum advantage to 100% electric vehicles and include them in your list with walk, cycle, public transport
51	Su Bonfanti	I support the overall direction of reducing car usage and increasing public transport/cycle/walk. But I am not clear how you can affect through journeys, especially through-commuting by car, unless your policies are co-ordinated with neighbouring boroughs on this.
54	Paul Luton	Tending to be lacking in ambition.
61	Tom Minns	You seem to have become anti car almost as a religion. It's reached point where you are ignoring anyone with another viewpoint

Respondent reference no.	Name / Organisation	Detailed comments
64	Johanna Eschbach on behalf of Richmond Bridge Residents Association	We support the overall direction of reducing car usage and increasing public transport/cycle/walk. But we are not clear how you can affect through journeys, especially through-commuting by car, unless your policies are co-ordinated with neighbouring boroughs on this. There is a particular issue in East Twickenham in the difficulty of cycling over Richmond Bridge. We would welcome a specific study of this issue, including the option of making the 9 pavement on one side a shared cycle/pedestrian path with separation curb, though this would also need consideration of what happens at the Richmond end. We don't support changing parking standards in low PTAL areas of the borough, ahead of actual improvements in access to public transport, as those areas likely to be less affluent ones already. We agree that some reduction in town centre parking might encourage more non-car trips. Alternative uses of some existing car parks might make sense, where they are in desirable locations, but at same time, could remaining car park areas be more intensively used? The Richmond Town Car Park is an extensive area but only on one level. A 2 storey car park in a pretty ugly location between the A316 and the railway line could provide what's needed and allow other locations to be freed for other uses. Generally, where parking is reduced, parking reserved for residents should be prioritised and parking for visitors removed first. And the council should consider the continued issuing of more than one parking permit per household. The CPZ in East Twickenham, Zone F, is already over-subscribed and this frustrates many possible changes.
69	Geoff Bond on behalf of Ham and Petersham Association	Until the PTAL rating is improved significantly for Ham and Petersham disincentives of car use will fall most heavily on those reliant on cars which tend to be older less mobile and those with young families
71	Patrick Wood	There should be more emphasis on reducing car-dependence.
What measures need to be put in place if the Council is to support car-free and car-lite development in areas with currently lower levels of access to public transport?		
21	Lucy Wakelin, Transport for London Commercial Development	TfL CD broadly supports Richmond's approach towards sustainable travel. We strongly agree that car-free developments should be supported and that development in locations with high existing or planned public transport accessibility should be optimised, in line with Intend to Publish London Plan Policy H1.
25	Phoebe Quayle	All new development should be 'car-free' with no parking for private cars. Most existing housing in Richmond has private car parking: there is no need for more of this type of housing. Many residents cannot or do not want to live with a car, particularly older and young people, and those on low incomes. New housing should cater for these people and, in doing so, also reduce car trips in the borough. The borough should also promote the redevelopment of sites like large surface car parks which encourage car trips, and reduce or remove parking for private cars, moving wherever possible to car club parking only, and ensure its Local Plan more generally links closely to the Borough's transport targets i.e. those relating to increasing use of public transport, walking and cycling, improving air quality and reducing car trips, traffic and road danger.
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	Need to get more bus routes built, and better cycle lanes – preferably segregated cycle lanes along main roads. Areas with lower levels of public transport also have higher levels of car use and this means there is more need to control fast and aggressive driving, therefore, more physical traffic calming measures need to be taken. Any new cycling facilities should also allow faster cyclists to be able to overtake slower cyclists – where possible - as this can cause conflict which puts people off cycling. As the volume of cyclists increase there is likely to be more conflict between different types of cyclists.
31	Tim Catchpole on behalf of MESS	Provide better public transport and more car club spaces.
35	Alice Roberts, CPRE London	Planning for low-carbon, car-free development within the urban footprint is essential <ul style="list-style-type: none"> It is vital that all development is planned in such a way that people can live without private cars (since most housing in Richmond has car parking available, there is no need for new housing to cater for private car-parking: new developments can have car club parking only and sustainable transport hubs with cycle parking, delivery hubs etc.). Richmond needs to meet the Mayor's Transport Strategy targets, tackle air pollution, the climate emergency and road danger and improve people's activity levels and health. It will not be able to do this unless it plans for car-free housing development. <p>See also comments made above.</p>
39	Solomon Green	None the Council should consider improving and extending access to public transport as well as improving and road access.

Respondent reference no.	Name / Organisation	Detailed comments
40	Jamie Edwards	Not Answered
41	Anthony Swan	Bicycle lanes separate from that used by busses lorries and cars. Secure cycle parking near public transport.
42	Jeremy Gill	Build places closer together.
43	Paul Hart Prieto	This should not be based on increasing costs for car use as many have cars for longer distances. it should be based on providing a better service in public transport or cycle ways and cycle security etc. Intelligent public transport routing and increased frequencies "Uber style" shared service autonomous green vehicles etc. for shopping, many would need a car for larger purchases. if they cannot and start to use more online shopping then this negatively impacts our town centres and employment levels. maybe a scheme that allows someone to shop and then same day delivery routing?
44	Roger Cutler	More charging points for battery cars. As these are green you don't need car-free & car-lite policies.
45	Sally Beeson	Public transport needs to significantly improve with lower costs for everyone
46 (a) (b)	Joan Gibson	Need a full review of public transport. I regularly wait 25minutes+ for buses to Whitton when I see other frequent services go past me half empty. The Whitton bus then comes packed to the gills. If a driver is off sick (which it appears many are always on sick) then drivers need to be taken off more frequent services to ensure the less frequent ones are covered. Trains to Whitton although 4 an hour come grouped together so the net effect is, they arrive every half an hour. Bus timetables need to be linked to train timetables, so when you leave the train you can get a bus quickly. If there are road works buses, cycles and pedestrians need to be given their own route so the road works do not affect their timetables. Road works must be done in a more joined up manner. When the exit to the A316 at Hanworth was closed by TfI they routed the traffic through Whitton but refused to change the traffic light sequencing at the Whitton A316 junction to allow the traffic (which included buses) to disperse. Instead we had miles of traffic jams which again made public transport unreliable. Cars must be stopped from crowding pavements. In Church Street Twickenham even, a single pedestrian cannot walk along the pavement as the pavements have been made narrow due to car parking spots (cars often then park on the kerb). Cars do not even need to access this road – they can use the road next to York House. Ban the car on roads such as this and town centres.
56	Trevor Rowntree	Lower emission cars should be encouraged rather than car-free/car-lite development.
48	Roger Wilson on behalf of Roger Wilson Consulting LLP	Segregated cycle lanes. Improved walking routes. Prioritise pedestrians and cyclists over cars and vehicles. More, improved and cheaper public transport.
49	Margaret Edwards	Answered earlier re school journeys and commutes
52	Winston W Taylor	Restrict parking.
53	Richard Woolf on behalf of McDaniel Woolf Architects	Investigate connectivity and new foot and cycle bridges. Review your WSP report from October 2018. [A copy of the WSP Report was provided, which is available at https://www.richmond.gov.uk/media/16409/thames_bridge_feasibility_summary.pdf]
54	Paul Luton	Safe cycling routes to stations, shops, schools etc. In fact a safe borough cycle network. Cycling levels are high despite poor provision. With good provision we could reach Dutch levels. Lower levels of access to public transport is highly relative ; compared with most of the country the whole borough is well provided.
59	Paul Massey	clean public transport is the the key to a brighter future in the borough
60	Kingsley Izundu, Royal Borough of Kingston upon Thames	1. Improved public transport accessibility 2. Good design that will reduce conflict between pedestrians and motor vehicles. 3. Good accessibility to social and cultural facilities within the area. 4. Location of facilities in an accessible location to pedestrians and cycle use.
61	Tom Minns	Change the policy

Respondent reference no.	Name / Organisation	Detailed comments
63	Carol Rawlings	Bus lanes wherever feasible. Reintroduction of trolley buses (quieter and smoother than buses and less polluting). A tram to run along the current 65 bus route.
68 (a)	Mark Jopling	EV charging infrastructure, shared-ownership vehicle infrastructure 100% EV buses by 2030 Although outside the Borough, there should be a new "multi-modal" transport hub just SW of Jn1 M3 to take "through traffic" off the M3 and onto SW Trains Shepperton Line (and in future Crossrail 2)
68 (b)	Mark Jopling	More EV charging More dedicated cycling routes Multi-mode hub on the M3 to offload car traffic onto SWT
69	Geoff Bond on behalf of Ham and Petersham Association	Improve the public transport and avoid a reduction in space for cars by opposing closing Richmond Park to through traffic. Make owning an electric car possible by providing some public charging points.
70	Melissa Compton-Edwards	Improve public and active transport provision in low PTAL areas (including bus frequency) so that car-free and car-lite developments are possible. Take active transport provision into account when considering applications. Do not give approval to any new residential or business developments that are not car-free/car-lite.
71	Patrick Wood	Better public transport provision, if necessary through prioritising buses over private vehicles, including where they can be parked.
What additional facilities does the borough need to support greater levels of walking and cycling?		
12	Tim Lester	I read through a lot of the plan, most of which I agree with, and then ran out of time. There is one area on which I would like to comment which relates to cycling in the Borough. 1. Encouraging more young people to cycle <i>I live at [full Hampton address details removed for data protection].</i> Every morning a string of buses passes up the road to Hampton School and LEH carrying their pupils. A number of pupils, mainly boys it seems, walk past probably from the R70 bus stop or Hampton Station. The thing which I find surprising and disappointing is how few pupils cycle past. If we are to change to a more sustainable transport system we need more people cycling. If they don't cycle when they are young it is likely to be very difficult to get them on a bike in later years. I see some cycling proficiency classes in progress locally which is great but is it possible to encourage a larger proportion of youngsters to learn to cycle safely? Another problem is probably parents fears over safety and the 20 MPH limit may help in this respect. Cycling UK might have ideas and suggestions or indeed be able to organise help. 2. Cycle Paths I feel that those responsible for transport in the Borough should be sent out on bikes to use and experience the cycle paths for a few weeks. There is a tendency for paths to stop when things get tight, for the surface to be terrible (eg alongside the A316), to find vehicles parked across the cycle path (e.g. the Upper Sunbury Road, as it leaves Hampton invariably has one or more coaches parked on the path), etc. Some first hand experience by those who normally drive around could be very educational.
14	Transport for London	See comments in General Section. Securing sufficient quantities of good-quality cycle parking will also enable more people to cycle. We welcome the commitment to the London Plan cycle parking standards and commend the Council for looking beyond this to investigate the potential for higher standards. We strongly support this approach in Richmond, given the proportion of existing journeys that could be cycled and considering that the borough has one of the highest cycle mode shares in London. We welcome the Council's approach to securing developer contributions to the cycle networks within Richmond and note that the Council's Active Travel Strategy highlights areas that are less permeable by cycle. This is something that developer contributions could also potentially look to improve alongside strategic and local routes. We welcome the recognition of the importance of bus networks within the borough and will continue to work with the Council to understand how services and infrastructure can be improved, protected and funded.

Respondent reference no.	Name / Organisation	Detailed comments
20	Gary Backler, Friends of the River Crane Environment.	<p>FORCE supports improvements in transport provision for both cyclists and pedestrians. Our surveys offer quantitative evidence of the order of magnitude increases in cyclist and pedestrian usage that can follow investment in new and improved provision. We support the improvements that have been made in this regard in the borough during recent years. We believe there is scope for further improvements along the River Crane and DNR that will benefit road traffic management, connectivity and public health, and address positively the “constraint...of open space, linked by roads and interwoven by railways” (p8) that characterise the borough.</p> <p>FORCE would welcome a borough-wide review of the obstacles to “inclusive access and connectivity” (p51) for pedestrians and cyclists. We would particularly welcome a review of the severance factors which prevent the physical joining up of current, near-adjacent open spaces into larger spaces; and of the obstacles to improved pedestrian and cycle connectivity between such open spaces, including land ownership; and a prioritised plan to address such factors.</p> <p>We know that many people use pedestrian and cycle networks across borough boundaries and this is what enhances their value for local residents and the wider communities. This approach can also bring in funding sources that are not available to in-borough schemes. As yet though, despite asserting that “We also work closely together with neighbouring boroughs...particularly where issues cross borough boundaries” (p6), the Local Plan in general does not consider what happens beyond the borough boundary. We believe that the council needs to consider active travel at a sub-regional level, working alongside other boroughs and in concert with agencies such as Crane Valley Partnership and Thames Landscape Strategy, to help deliver these cross borough links.</p> <p>In 2019 FORCE worked alongside Ove Arup, The Crane Valley Partnership and The Colne Valley Partnership to produce the “Colne and Crane Valley Green Infrastructure Strategy”. This document sets out a strategy for enhancing the linkages along the Crane valley and Colne valley corridors, linking the Thames with the Chilterns through a network of biodiverse green transport networks http://www.cranevalley.org.uk/news/post/Colne-and-Colne-Valleys-Green-Infrastructure-Strategy-published.html LB Richmond officers engaged with this project as a key consultee. FORCE considers that the Local Plan would benefit significantly from adopting the strategy as a strategic objective for enhancing green links between the borough and wider green infrastructure network.</p>
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	<p><u>Borough:</u></p> <p>Of the utmost importance there is secure cycle parking – as bike theft is the number one reason why people choose not to cycle. We need this in town centres, and in all new housing units.</p> <p>Need a compressive system of cycle lanes marked onto the main roads.</p> <p>Need to review all existing cycle lanes and ensure the road markings and more prominent – the current light touch approach means that most cycle lanes are unusable. Twickenham town centre is an example where the markings are not up to the job.</p> <p>Where cycle lanes have to stop – such as on a narrow bridge or through a busy high street – the council need adopt a mixed-use zone approach – so that its very clear to motorists that they are sharing he space equally with cyclists. For this to work we need a change is tarmac colour or surface, prominent road markings and signs, and traffic calming.</p> <p>Need to identify main walking routes and maintain them better – to match the standards on the main roads – currently most main routes are based on car usage.</p> <p>To survey all the crossing points as many don’t meet the requirements of the Equalities Act – i.e. no dropped curbs or dropped curbs not flush with road.</p> <p>Maintain vegetation on bridges better – many footpaths over bridges have hedges that encroach on the footpath and narrow it down too much. When this occurs, it can take months before its cut back.</p> <p>Need more secure cycle parking near stations.</p> <p>Need more speed calming on main roads as the 20 MPH is not adhered too – and fast traffic dissuades people from cycling and walking.</p> <p>Need benches at periodic intervals so people can sit down and rest on walking routes. We used to have a network of these, but some of these were removed because they were perceived to led to antisocial behaviour.</p> <p><u>Heathfield & Whitton</u></p> <p>Need a road cross by the underpass on the A316 by Jubilee Avenue / Meadway. There is a large part of what was historically Whitton (and still part of St Augustin’s Whitton Parish) across the A316 including Lincoln Avenue and Kneller Gardens.</p> <p>We believe the speed limit on the A316 between Hospital Bridge Road and Whitton Road should be reduced to 30 MPH and the lanes narrowed / regraded so that the A316 does not slice the area into two. The reclaimed space could be used to prove good quality cycle lanes.</p>

Respondent reference no.	Name / Organisation	Detailed comments
		<p>There is a need for a network for cycle lanes that fan out from Whitton High Street so that local residents are encouraged to make short trips by bike rather than car. The cycle lane in Hanworth Road has large gaps and the zebra crossings haven't been updated to reflect the changes in legislation that allows a cycle lane to continue through them.</p> <p>Percy Road has a part time cycle lane that operates from 8am to 9.30am on one side of the road only. We recommend that the council explores converting this to 24 hour operation, and one is added to the other side of the road too.</p> <p>On Hospital Bridge Road, the TFL cycle lane around the roundabout ends at the TFL land boundary outside the church and the cyclists are expected to squeeze back onto the main road where there is hardly any room for them. We suggest that the pavements around the Hospital Bridge Road Traffic Lights also become mixed use. The railway bridges on Hanworth Road, Hospital Bridge Road and Nelson Road need upgrading to provide footpaths at least 2 meters wide (as they only have footpaths on one side).</p> <p>Some of the traffic islands on Percy Road need to be altered to convert them into pedestrian refuges. None of the five islands between Rycroft Avenue and Montrose Avenue had pedestrian facilities.</p>
31	Tim Catchpole on behalf of MESS	Reduce parking spaces in our town centres but keeping provision for the elderly and disabled.
39	Solomon Green	Improve pavements and prosecute all cyclists (and scooter users) riding on them.
41	Anthony Swan	protected cycle lanes
42	Jeremy Gill	Fill some of the holes in the roads. They cause cyclists to fall off a lot and buckle wheels. Repair some of the pavements. You know pavements, what we walk on.
43	Paul Hart Prieto	Secure bike storage more and simpler "rent a bike" schemes new and direct, walkways between towns
44	Roger Cutler	For walkers we need cycle-free pavements. Although against the law, pavement cycling is injuring more walkers daily. It is ignored by police and council workers (indeed pavement cycling is even promoted by one council worker.) We don't want any more cycling in the borough. Cyclists are insensitive, travel too fast for safety &, worst of all, are not licensed so they can be prosecuted. Cycling receives too much money & attention.
45	Sally Beeson	I think in general, the Borough does a very good job to raise awareness. Schools and parents should encourage children to walk more
46 (a) (b)	Joan Gibson	<p>We need to get away from thinking cars and powered vehicles can be zero emissions. They always will emit particulates and until we have a 100% renewable generated electricity will create emissions somewhere in the UK. I make this point as this needs to be reflected in policies as there is a tendency to think we do not have to change our behaviour technology will save us – this is not the case. I would be happier with lower emission vehicles being used as a term in your document. Huge concerns about the cycling plans. You have taken only what is happening now to focus improvements and spend on areas where cycling is high. Richmond must have a vision and plan to improve those areas where cycling trips are low. These low cycle areas have the biggest potential to get more folks cycling, reduce car use and improve health.</p> <p>Planning does have a massive role in enabling Active travel, but all the rules and policies exist already and planning are accepting less from developers. Could LBRuT explain how this will change in the future.</p>
47	Trevor Rowntree	None. Enough/too much has been done already.
48	Roger Wilson on behalf of Roger Wilson Consulting LLP	<p>Segregated cycle lanes.</p> <p>Improved walking routes.</p> <p>Prioritise pedestrians and cyclists over cars and vehicles.</p> <p>More, improved and cheaper public transport.</p>
49	Margaret Edwards	Better walking access to riverside all the way along, some owned privately. Footbridge between Ham and Twickenham a good idea
50	John O'Brien	Segregated cycle lanes that are continuous and which cannot be parked in.
51	Su Bonfanti	There is a particular issue in East Twickenham in the difficulty of cycling over Richmond Bridge. I think you need a specific study of this issue, including the option of making the pavement on one side a shared cycle/pedestrian path with separation curb, though this would also need consideration of what happens at the Richmond end.

Respondent reference no.	Name / Organisation	Detailed comments
52	Winston W Taylor	Stop clutter on pavements such as advertising boards; widen some pavements; stop cycling on pavements; increase cycle parking in some areas where demand arises.
53	Richard Woolf on behalf of McDaniel Woolf Architects	See response to Q.73
54	Paul Luton	A circulation plan with through traffic limited to certain roads would provide a better environment for walking and cycling. Safe crossings of the main roads would be needed. Cycling generally provides longer distance travel so segregated provision on main roads would also be needed.
58	Michael Atkins, Port of London Authority	Considered that there must be reference within the Local Plan that for developments in close proximity to the River Thames, there must either maintain and improve existing access to riverside areas or provide new access to the riverside and the Thames Path., in line with existing Local Plan policy LP 18 (River Corridors)
59	Paul Massey	Dedicated cycling safe route from Ham to Richmond 24 /7
60	Kingsley Izundu, Royal Borough of Kingston upon Thames	1. Adequate and affordable cycle parking bays. 2. Subsidised cycle renting. 3. Well segregated pedestrian walkways and cycle routes. 4. Better frequency of bus services.
61	Tom Minns	None
63	Carol Rawlings	Walkers and cyclists need to be separated from one another, particularly along the tow path which has become dangerous for walkers and seriously overcrowded at weekends. If vehicles continue to use Richmond Park, cyclists should be banned from using the roads and the cycle paths, which are never used, need to be upgraded.
68 (a)	Mark Jopling	Better protected cycle routes through the Borough
69	Geoff Bond on behalf of Ham and Petersham Association	Make sure all facilities that are needed are local eg all healthcare, all schools and all shops. Until they are people will continue to use vehicles. Hold developments to their green transport policy and prevent future developments until they do - the German School gets ever bigger without actually keeping to its green travel plan.
70	Melissa Compton-Edwards	Given the related policy frameworks, from the mayor, but also from the Government, the council needs to be more aggressive in its pursuit of mode share changes, for both environmental and public health reasons. In this section I support the Richmond Cycling Campaign's desire to see some more detail, and some more concrete objectives that will help to deliver sustainable travel - and would suggest inclusion of elements like: A plan to offer low traffic neighbourhoods across the borough A commitment to offer cycle hangars on every road by 2026 Provide safe, pedestrian priority crossing points on every road in the borough (whether zebra, toucan, etc.) Implementation of school streets for every school in the borough by 2025 Design and maintain publicly shared plans to provide everyone with a safe cycle lane within 400m of their home by 2030, and 200m by 2035 Create a working group with town centre businesses to set up last mile transport hubs, shared deliveries, and other identified schemes to reduce and coordinate deliveries.
71	Patrick Wood	Better cycling infrastructure: better road surfaces, segregated infrastructure, ASLs, enforcement of existing traffic laws to make the roads less intimidating for cyclists of all abilities.
If the availability of parking in the borough's town centres was less than it is now, would it encourage you to walk, cycle or use public transport more?		
Of respondents who answered the question: 9 said yes, 14 said no and 3 don't know [12 did not answer the question]		
14	Mayor of London	The Mayor is pleased that Richmond intends to apply the Intend to Publish London Plan residential parking standards, including those for areas with low public transport accessibility levels (PTALs). Richmond should also explore the potential for increasing levels of public transport, cycling infrastructure and promoting other

Respondent reference no.	Name / Organisation	Detailed comments
		forms of active travel such as walking in accordance with the Mayor's Healthy Streets Approach. Whilst the Mayor strongly supports Richmond's objectives on sustainable travel, it should be aware of the Secretary of State's Directions on the Intend to Publish car parking standards.
15	Transport for London	See comments in General Section. A key part in achieving this ambition [addressing the climate emergency and housing crisis and its recognition of the importance of transport in achieving this, as well as tackling other health and environmental challenges through prioritisation of sustainable transport users] will be restricting the provision of car parking in new developments. We would therefore strongly encourage the Council to require car-free and car-lite development as far as possible. We strongly welcome that the Council are considering adopting the London Plan residential standards across the whole borough and encourage this option to be pursued. This will help minimise new development's contributions to the climate emergency, make it easier to tackle the housing crisis and reduce congestion on the road network and the borough grows.
27	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond	Ideally, cars used by visitors to Richmond should be parked at the perimeter of Richmond and bikes used to access the Richmond rail station should be parked at the station. People transferring from cars to train/tube should use Richmond's car parks. Cars used by residents should be allowed within Central Richmond and around the Green. Clearly these suggestions raise issues of displacement, parking and implementation.
22	Jimmy Wallace, Richmond Athletic Association	We note the suggested policy directions to encourage sustainable transport and welcome the opportunity to review the detailed policies as these are further drafted. At this stage, we would simply note that appropriate levels of car parking for development should appropriately be assessed as part of any future planning application dependent upon the uses within the scheme. It is also recognised that it is necessary for there to be overarching policy and guidance in the context of planning applications that are referable to the Greater London Authority (and by extension Transport for London) for its determination. However, we think it is necessary for there to be clarity in the policies at the local level that acknowledge that local site circumstances and transport considerations should be the key determinant in setting appropriate levels of car parking, as opposed to the London wide parking standards adopted by the GLA & TfL which by their very nature cannot consider the individual transport and accessibility circumstances of all sites.
29	Richmond Cycling Campaign	A possible study, which could inform a number of other policy areas, could be analysis of how much space in the borough is given to car parking, whether residential or business - it would surely be worthwhile to understand how much public land is devoted to the parking of vehicles right now, as we could then have another data set to show us the benefits gained from releasing this land to other uses.
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	Though its unpopular to reduce parking, evidence shows that mode shift can be achieved. However, there is the risk that it could have a negative environmental impact if it results in people driving round the block several times before a space becomes free. It may be more appropriate for the council to look at changing the charging structure, and prioritise short term stays rather than allowing all day parking. In Richmond Town Centre many parking spaces are taken up by commuters using it as an all-day park and ride to central London – and the consequence lack of parking is prompting local people to drive to Kingston instead when they need to access higher level services and this results in money leaving the boroughs local economy.
39	Solomon Green	We live too far from the (currently infrequent) public services to make regular use and would merely transfer our expenditure to other areas outside our borough.
41	Anthony Swan	It would discourage me from visiting. Short term free parking ie 30mins already in existence is very good.
42	Jeremy Gill	Which of the above do you mean? Cycle
43	Paul Hart Prieto	I already use public transport and walk mainly. less parking would simply stop me making larger purchases in the town centre
44	Roger Cutler	Neither I, nor any friends, would continue to use the town centres. Public transport is too unreliable
45	Sally Beeson	It would annoy me - we cannot demonise all car related activities
46 (a)	Joan Gibson	Pedestrianising the town centre would encourage me to use them more
46 (b)	Joan Gibson	To encourage me to go back to cycling to Whitton and Twickenham town centres you must fix the issues you have caused by narrowing the roads and give cyclists a priority above cars. Stop cars parking in cycle lanes, create cycle routes such as an off-road cycle lane at Whitton corner so cyclists do not have to try and negotiate a junction which is recognised as being dangerous.
49	Margaret Edwards	Already walk or use bus/train to get into town centres
50	John O'Brien	Already use public transport except when my trip requires me to take the car.

Respondent reference no.	Name / Organisation	Detailed comments
51	Su Bonfanti	I live so close that we don't drive into Richmond anyway.
52	Winston W Taylor	I dont drive so this question is not for me.
53	Richard Woolf on behalf of McDaniel Woolf Architects	Parking and cycling are separate issue. Economics and the quantum shift required to move to sustainable transport isn't about parking.
54	Paul Luton	That is how I travel now.
60	Kingsley Izundu, Royal Borough of Kingston upon Thames	1. Yes, if the alternative is good enough. 2. Improve frequency of bus service. 3. Adequately segregated pedestrian walkway. 4. Affordable cycle rental service.
63	Carol Rawlings	I avoid using my car to go to any town centre.
69	Geoff Bond on behalf of Ham and Petersham Association	It would discourage me from shopping there
70	Melissa Compton-Edwards	I already walk, cycle or use public transport to get to the borough's town centres and support reducing parking availability in town centres to encourage mode shift to sustainable forms of transport.
Should the Council actively pursue alternative uses (such as much needed affordable housing, employment space and/or social and community infrastructure uses) on its existing car parks in town centres?		
Of respondents who answered the question: 16 said yes, 11 said no and 2 don't know [9 did not answer the question]		
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	It would be a mistake to remove car parks in town centres as it would push the parking onto the roads and make it more difficult to reallocate space on these roads to cycle lanes. However, cities like Paris have made better use of their open-air carparks by redeveloping the sites and putting the parking underground and putting much needed housing and offices above.
35	Alice Roberts, CPRE London	[Response also in Retail section]. Surface and multi-storey car parks, along with low-rise retail sites, should be redeveloped to make more efficient use of space and discourage car trips. <ul style="list-style-type: none"> • Surface car parks are an inefficient use of space and encourage non-essential car journeys. In Annex 1 a number of sites are identified which could be redeveloped to find space for housing and commerce and at the same time reduce reliance on cars. • These sites are viable and much more sustainable alternatives to Green Belt. [See Annex 1 in the Schedule of Call for Sites Responses]
39	Solomon Green	But it could build over rather than on top of some car parks such as that in Richmond on the A 316.
41	Anthony Swan	Be a bit more brutal with large developers over affordable housing.
43	Paul Hart Prieto	Parking will still be required. that said, parking with Flats above could provide a reasonable solution
44	Roger Cutler	We need MORE parking, not less.
45	Sally Beeson	I think this should be monitored to see if all car parking spaces are used enough, and then maybe change the policy
46 (a)	Joan Gibson	With the car parking underground
46 (b)	Joan Gibson	I agree the council should build on its town centre car parks. The parking could be place under the building with very little net loss.
49	Margaret Edwards	Richmond car park opposite Old Deer park seems a prime location
51	Su Bonfanti	I think that some reduction in town centre parking might encourage more non-car trips. Alternative uses of some existing car parks might make sense, where they are in desirable locations, but at same time, could remaining car park areas be more intensively used? The Richmond Town Car Park is an extensive area but only on one level. A 2 storey car park in a pretty ugly location between the A316 and the railway line could provide what's needed and allow other locations to be freed for other uses. Generally, where parking is reduced, parking reserved for residents should be prioritised and parking for visitors removed first. And the council should consider the continued issuing of more than one parking permit per household. The CPZ in East Twickenham, Zone F, is already over-subscribed and this frustrates many possible changes.

Respondent reference no.	Name / Organisation	Detailed comments
52	Winston W Taylor	Elleray Hall proposal is a good example
53	Richard Woolf on behalf of McDaniel Woolf Architects	Look at the ' air above ' the land.
60	Kingsley Izundu, Royal Borough of Kingston upon Thames	The evidence should dictate the approach to provision of uses. There should be a good balance in the pursuit and provision of alternative uses. The provision of use should lead to sustainable development.
63	Carol Rawlings	Housing that is truly affordable is more important than driving a car.
69	Geoff Bond on behalf of Ham and Petersham Association	This would just mean the shops close and people drive to where they are open
71	Patrick Wood	Car parking is massively subsidised: the real cost is shocking, both monetary and environmental.
General comments relating to this topic area		
27	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond	<p>We have referred to the importance of reducing carbon and other air pollutants under the theme on these two topics. <i>[See comments as above]</i></p> <p>Walking and cycling can be enjoyable and provide the benefit of exercise. We suggest walking and some cycling should be the principle mode of travel within Central Richmond, along the Riverside and around the Green. There already exists the riverside cycle route. It is important to take account of any adverse impact from cycling in the area largely set aside for walking. Through-traffic should be directed away from Central Richmond and the Green but we recognise that for the foreseeable future there will be a need for traffic along George Street and that pedestrianisation is not an option given the displacement around the Green and to other areas of Richmond.</p> <p>Ideally, cars used by visitors to Richmond should be parked at the perimeter of Richmond and bikes used to access the Richmond rail station should be parked at the station. People transferring from cars to train/tube should use Richmond's car parks. Cars used by residents should be allowed within Central Richmond and around the Green. Clearly these suggestions raise issues of displacement, parking and implementation.</p> <p>Cars emit carbon and air pollutants and the Direction of Travel seeks to reduce these as does the current Local Plan. During the life time of the current Local Plan zero emission cars could represent a significant proportion of the car fleet. But the DfT's current consultation on Transport De-carbonisation projects vehicle km to increase between 2020 and 2030 by around a 15% and associated carbon emissions to reduce by around 25%. These are UK wide statistics. Based on these figures, road congestion and carbon seem likely to remain issues through the life of the current Local Plan.</p> <p>We believe it important that planning takes on board electric charging of cars at scale.</p> <p>We support modal shift to public transport.</p> <p>Notwithstanding the direction of travel outlined, we do recognise that residents and visitors with zero emission vehicles should not be unduly inconvenienced with a reduction in visitor and resident car parking capacity.</p> <p>We believe the policies in the current Local Plan cover the travel issues adequately and if further amplification is required we would suggest that it could dealt with by subsidiary planning tools.</p>
46 (b)	Joan Gibson	Worried you are saying street building should be for walking (only) – this focus on walking only has meant LBRuT have spent a huge amount of money making changes to roads and pavements which has made it worse for cyclists. Whitton and Twickenham town centres could have been designed to include cyclists when you spent multi-millions of pounds on pavements and road layout. Instead you narrowed the roads and forced cyclists into the flow of traffic. In Whitton it has resulted in

Respondent reference no.	Name / Organisation	Detailed comments
		<p>less people cycling. This sort of costly mistake must not be repeated. All new street and road design must include separated pedestrian, cycling and road infrastructure – with road being the least important.</p> <p>Cars must be stopped from parking in cycle lanes.</p> <p>Your connectivity plans do not include improvement to certain areas in Hampton with no bus routes and Whitton with low frequency. Cycle routes must be made in Whitton.</p> <p>You can improve walking routes by opening up routes through cemeteries (pleasant, direct and low pollution) and other infrastructure sites. Walking routes need to be mapped out and focus put on them. i.e. all the budget in Whitton seems to be focussed on the car routes to the High Street rather than the walking routes along Springfield Road etc. These walking routes are in a poor state of repair.</p> <p>New developments must include secure cycle storage – not just outdoor posts. Cycle crime is a key obstacle to cycling.</p> <p>New developments must provide good walking and cycling routes to local areas like town centres, parks, medical centres.</p> <p>I disagree you are trying to ensure congestion and airquality is a consideration in new developments currently. In the case of both THS and Lidl on South Road planning recommended approval without any mitigating actions despite knowing about the huge levels of congestion. Once again, I think you are over estimating what quality criteria LBRuT impose on developments, making the likelihood of this change to the local plan actually working very remote.</p> <p>I worry that in areas of low PTAL you focus on parking standards rather than improving the PTAL. If you are serious about getting more people on public transport you need to improve the PTAL. I completely disagree with you adopting the London plan parking levels (high or low). You must improve the PTAL to make car ownership and use less needed.</p> <p>I worry about remarks like “if PTAL can be improved or if walking routes can be improved”. There is no option your plan should say – high PTAL, walking and cycling routes will be provided – otherwise no development.</p> <p>Walking routes need seating along them.</p> <p>All developments (not just large) should have a levy which contributes to walking and cycling infrastructure so you do not let lots of “small” developments through with the net effect of raising car use and reducing active travel.</p>

Securing new social and community infrastructure to support a growing population

Do you agree with the proposed policy directions?

Of respondents who answered the question: 20 said yes, 2 said no and 3 don't know
 [13 did not answer the question]

10	Stuart Morgans, Sport England	Please see comments in Section relating to Social Infrastructure.
22	Jimmy Wallace, Richmond Athletic Association	Please comments below.
42	Jeremy Gill	Incomprehensible
46 (a)	Joan Gibson	See below

Respondent reference no.	Name / Organisation	Detailed comments
48	Roger Wilson on behalf of Roger Wilson Consulting LLP	Promote walking, public transport and cycling. Stop use of cars and vehicles across the Borough.
55	Jon Rowles	The council needs to have a 'Sequential Test ' process written down so we don't have the re-run of the Turing House School situation where council officers wrote the test as they went along.
64	Johanna Eschbach on behalf of Richmond Bridge Residents Association	We support the idea of 'increased public access to school facilities'. We're about to have a whole new school - the biggest bit of infrastructure in East Twickenham for years - and it would be good for it to be well used. We also recognise the importance of sustaining ETNA, as well as the existing tennis, cricket and bowls facilities.
Is there a need for a particular type of community facility in your local area?		
4	Lambert Smith Hampton on behalf of Metropolitan Police Service	<p>Lambert Smith Hampton (LSH) has been instructed by the Metropolitan Police Service (MPS) to make representations to the above consultation. This representation concerns the MPS' infrastructure requirement for a car pound facility within the London Borough of Richmond, S106 contributions to mitigate impact on crime, and the MPS infrastructure requirement for neighbourhood police facilities.</p> <p>Requirement for a car pound</p> <p>The MPS infrastructure requirement has changed since we submitted our representation to the Council in January 2020 for the Richmond Planning Obligations SPD Consultation. The MPS now have an urgent infrastructure requirement for a car pound facility within the London Borough of Richmond or any other London Borough. The requirement is for 6 - 12 acres (2.5 - 5 hectares) of open industrial land (leased from private landlords or purchased freehold).</p> <p>A car pound facility is where the MPS deal with vehicles that have been stolen, seized for motoring offences or for forensic examination. The MPS are finding that the owners of their existing car pound sites are seeking to pursue development opportunities and cease the current use when the lease permits. Both of the current car pound sites are subject to pressure for industrial and/or residential development and intensification of use.</p> <p>The MPS are concerned that if their existing car pounds have to be vacated, this may have significant difficulties in operating their vehicle recovery and car pound service. The difficulties that exist in finding land for car pounds also extend to other aspects of policing, including the following:</p> <ul style="list-style-type: none"> - Driver training; - Firearms training; and - Dog Training. <p>The MPS are therefore requesting that the London Borough of Richmond work with the police to identify suitable plots for the delivery of a car pound facility within the borough. (Richmond is considered to be a good location for the delivery of a MPS car pound facility).</p> <p>Further to the above, the MPS request that the emerging Richmond Local Plan and/or Infrastructure Delivery Plan (IDP) include a section highlighting the importance of the MPS car pound requirement in the borough.</p> <p>Neighbourhood police facility infrastructure requirement</p> <p>As noted in our representation to Richmond Council in January 2020, the MPS have an infrastructure requirement for neighbourhood police facilities that can provide a base of operation for officers of the MPS.</p> <p>Summary</p> <p>The MPS have an urgent infrastructure requirement for a car pound facility and are requesting that the Council work with the police to identify suitable plots. The MPS would like this infrastructure requirement to be referenced in the new Local Plan and/or IDP. The MPS are pleased to see that policing is referenced as social infrastructure in the adopted Local Plan and have an infrastructure requirement for neighbourhood police facilities.</p>

Respondent reference no.	Name / Organisation	Detailed comments
		We are keen to engage with you to discuss how the MPS car pound infrastructure requirement can be accounted for in the borough and the potential for a site allocation in the future.
23	Paul Velluet & Peter Willan on behalf of Old Deer Park Working Group	In responding to Question 78, the Group supports the proposed continuation of the policy for the protection and, where possible, the enhancement of existing land and facilities for sport and playing fields, and the protection of Public Open Space and the provision of enough play-space. In relation to the Old Deer Park in particular, the Group supports the continued use of both public and private open space for outdoor sports, including rugby football, association football, cricket, tennis, archery and bowls, and the retention and potential enhancement of the existing, listed Pools-on-the-Park – including, importantly, its associated landscaped open-space – for swimming and directly related leisure activity. In addition, the Group supports the commissioning of up-to-date research on Indoor Sports Facilities Needs Assessment, Playing Pitch Assessment, Playing Pitch Strategy and an Open Space Assessment, as put forward on page 54 of the consultation document.
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	The pavilion in Heathfield Recreation Ground needs rebuilding, to provide better sports facilities and a room for community use in the South part of Whitton. The original pavilion built in the first half of the twentieth century had these facilities.
31	Tim Catchpole on behalf of MESS	Yes, Mortlake needs a health centre. There are ongoing discussions about community infrastructure on the Brewery site.
32	Mark Jopling on behalf of UPPFT	The Trust makes the following comments on the "Direction of Travel": <ul style="list-style-type: none"> Keep the Playing Pitch Strategy up-to-date as a strong document, with regular local club and NGB consultation. Speculators seek to exploit documents like PPS if they are not current and robust, community clubs will be vulnerable to "vultures" after loss of income due to CV-19.
36	Rebecca Marwood, NHS Property Services Ltd	<p>Foreword</p> <p>NHS Property Services (NHSPS) is actively working with our customers regarding the recent cases of coronavirus (COVID-19) and are currently assessing vacant or underused space across our portfolio to identify space that could be repurposed for the provision of clinical beds. In the interests of continuing to support the NHS in the longer term, however, we are keen to continue 'business as usual' activity where possible, and are supporting our customers in the management of their buildings and wider portfolios, to ensure the most efficient and effective use of NHS space.</p> <p>NHS Property Services</p> <p>NHSPS is a limited company owned by the DHSC. It was established in 2013 to bring property expertise to the NHS estate, with the aims of creating a more fit for purpose estate, reducing property related costs and generating funds to be reinvested in healthcare services and facilities. NHSPS had a portfolio of around 3,500 buildings across England which represents around ten percent of the entire NHS estate. Most of these buildings are used for primary healthcare and are either health centres or hospitals. However, NHSPS' properties are diverse in terms of their function and include many other types of premises, such as care homes and offices.</p> <p>A key part of NHSPS' role relates to the provision of new healthcare facilities with the goal of ensuring that the healthcare needs of communities can be met. NHSPS works with commissioners to identify and respond to local property needs. As such, it is involved in the acquisition and development of new facilities, and the redevelopment of existing facilities. Another important aspect of NHSPS' role is to dispose of facilities that have been identified as surplus to NHS requirements by commissioners.</p> <p>Representation</p> <p>At this stage of the Local Plan process, London Borough of Richmond upon Thames is asking for feedback on how the borough should accommodate growth and plan for new development. In this regard, NHSPS have reviewed the document and respond to the document through the below comments.</p>

Respondent reference no.	Name / Organisation	Detailed comments
		<p>Securing new social and community infrastructure to support a growing population Question: Continue to have firm policies to resist the loss of existing facilities, and to require the site to be considered for other types of community facilities before being released for other uses.</p> <p>The document considers the policy direction associated with community infrastructure and sets out that the London Borough of Richmond upon Thames will ‘continue to have firm policies to resist the loss of existing facilities, and to require the site to be considered for other types of community facilities before being released for other uses’.</p> <p>In April 2013, the Primary Care Trust and Strategic Health Authority estate transferred to NHSPS, Community Health Partnerships and NHS community health and hospital trusts. All organisations are looking to make more effective use of the health estate and support strategies to reconfigure healthcare services improve the quality of care and ensure that the estate is managed sustainably and effectively.</p> <p>NHSPS’s Property Strategy team has been supporting Clinical Commissioning Groups and Sustainability and Transformation Plan groups to look at ways of better using the local health and public estate. This will include identifying opportunities to reconfigure the estate to better meet commissioning needs, as well as opportunities for delivering new homes (and other appropriate land uses) on surplus sites emerging from this process.</p> <p>The ability of the NHS to continually review the healthcare estate, optimise the use of land, and deliver health services from modern and fit for purpose facilities is crucial.</p> <p>It is important to note that there are separate, rigorous testing and approval processes employed by NHS commissioners to identify unneeded and unsuitable healthcare facilities. These must be satisfied prior to any part of or all of a property being declared surplus. This often includes extensive public consultation on any proposed service relocations.</p> <p>Given that there is very careful oversight from NHS England and CCGs to ensure sufficient services are provided, and that the estate is fit-for-purpose, additional protection through planning policy should be unnecessary in relation to public healthcare facilities.</p> <p>Whilst Paragraph 92 of the Revised NPPF states that planning policies and decisions should ‘guard against the unnecessary loss of valued facilities and services’, the overarching objective of this same paragraph is to ensure the delivery of facilities and services for the community.</p> <p>Finally, any policy should make provision for the circumstances envisaged at paragraph 3.87A of the London Plan so that where public facilities are no longer needed the proceeds from the sale of those facilities / land can be invested in public facilities; not to do so could cause viability and / or funding issues, particularly given the requirement for the NHS to maximise receipts from the sale of surplus facilities and land.</p> <p>Additionally, The London Plan, in the supporting text for Policy 3.17 explicitly recognises the role of NHS PS in ensuring that surplus sites are released for other uses as part of the reorganisation of the NHS estate, which is taking place so that services can be provided more efficiently. The draft new London Plan is likely to go further, and proposed Policy S2 states that Boroughs should work with the NHS to “identify opportunities to make better use of existing and proposed new infrastructure through integration, co-location or reconfiguration of services, and facilitate the release of surplus buildings and land for other uses”.</p> <p>For the above reasons, any policy linked to the loss of community or health uses should be appropriately qualified so that it does not present an unnecessary or unreasonable hurdle to health service provision reconfiguration.</p> <p>Question: Continue to ensure that the impact of large new development is assessed, so that the impact of additional burdens on existing facilities is mitigated.</p> <p>When preparing Local Plans, Local Authorities should be tasked with a specific duty to co-operate with the NHS to facilitate its estate planning functions and delivery. We therefore support the requirement to ‘work closely with our partners to identify and meet people’s needs’.</p> <p>It is vital that boroughs work with NHS organisations to plan for healthcare facilities to meet the needs of Richmond’s future population. The explicit requirement for Local Authorities to collaborate with the NHS is welcomed. We would encourage the inclusion of health providers being actively involved in the preparation of their local plans, as this will help to enable the NHS to provide a comprehensive healthcare service to Richmond’s growing population.</p> <p>When preparing local plans, Local Authorities should be tasked with a specific duty to co-operate with the NHS to facilitate its estate planning functions and delivery.</p>

Respondent reference no.	Name / Organisation	Detailed comments
		<p>Local Planning Authorities should ensure that they work with NHS commissioners and providers to ensure that adequate healthcare infrastructure is provided to support new residential development. Healthcare facilities (including primary and secondary care) are essential infrastructure and where new facilities are required, they should be delivered alongside additional housing units to mitigate the impact of population growth on existing infrastructure. LPAs should therefore work with NHS commissioners and providers to consider the quantum and location of healthcare facilities that will be required to ensure that new developments are sustainable.</p> <p>Summary: The proposed changes would ensure that the NHS is able to effectively manage its estate, disposing of unneeded and unsuitable properties where necessary, to enable healthcare needs to be met.</p> <p>An essential element of supporting the wider transformation of NHS services and the health estate is to ensure that surplus and vacant NHS sites are not strategically constrained by local planning policies. NHS PS support more flexible policies that enable the NHS Commissioners conclusions to be acted upon where surplus land is identified, for the benefit of the local community and the NHS for the shared aim to provide essential services.</p> <p>Where NHS Commissioners can demonstrate that healthcare facilities are no longer required for the provision of services, there should be a policy presumption that such sites are suitable for housing (or other appropriate uses). It is imperative that NHS sites are not subject to overly onerous policies, particularly when the NHSPS is pressured by the White Paper and DCLG to deliver more housing. It also has a statutory duty to help finance improved healthcare services and facilities nationally through the disposal of their sites.</p>
41	Anthony Swan	Protected housing as proposed Udney Park
42	Jeremy Gill	Like Ellera Hall you mean? Yes. Leave it alone.
44	Roger Cutler	Sporting, or other provision, for teenagers
45	Sally Beeson	With an ageing population, a community space for the elderly is vital, as is nursery provision but at a minimal cost to parents
46 (a)	Joan Gibson	<p>Parks can provide local community infrastructure with high quality 2-storey Pavilions without any loss of green space. In Whitton both Heathfield rec and Murray Park have areas which are currently a hut or shipping container. Perfect for development to high quality Pavilions with community space for nurseries, life enhancing classes, music etc.</p> <p>Large Developments should include community and business space rather than retail.</p>
56	Trevor Rowntree	Yes. In my area we need a Public House which is a very effective community facility.
50	John O'Brien	Youth centres
51	Su Bonfanti	We have good community facilities here, so the important thing is sustaining ETNA, as well as the existing tennis, cricket and bowls facilities. Some of those are private but they do increasingly offer services to the community as a whole.
52	Winston W Taylor	I think Teddington is lucky with its community facilities. This is subject to the Ellera Hall consultation that rightly proposes a new facility providing additional community services.
53	Richard Woolf on behalf of McDaniel Woolf Architects	Emergency housing for rough sleepers with medical , social and phycological support.
55	Jon Rowles	<p>Heathfield Recreation ground needs its pavillion rebuilding.</p> <p>The 1970s one was burnt down and was replaced with a prefabricated building which was a lot smaller and proves only the most basic of facilities. The LBRUT playing pitch strategy on page 14 states that local sports teams view this as having poor quality old and dated facilities.</p>
56	Rob Kennedy, Environment Agency	No
57	Tom Clarke, Theatres Trust	It should be ensured, as referenced within this section, that strong policies protecting facilities are carried forward. It should be made clear such policies apply to cultural facilities and venues such as theatres, cinemas and music venues. This will ensure consistency with London Plan and NPPF policy.

Respondent reference no.	Name / Organisation	Detailed comments
58	Michael Atkins, Port of London Authority	As part of the revised Local Plan there must be continued support for the protection and expansion of river related sports and recreation facilities in the borough. The PLAs Thames Vision includes the goal to see greater participation in sport and recreation on and alongside the river by 2035 and the London Borough of Richmond Upon Thames, with it's large number of existing facilities can play a key part in achieving this aim.
63	Carol Rawlings	Ham already has a good range of community facilities.
64	Johanna Eschbach on behalf of Richmond Bridge Residents Association	Maintaining ETNA as a community group is essential.
68 (b)	Mark Jopling	Council takes too long to make decisions eg North Lane/Ellaray Hall Teddington, years of indecision serves no-one.
69	Geoff Bond on behalf of Ham and Petersham Association	Improved football and cricket facilities
What is the best way to provide enough school places for our growing population?		
18	Phoebe Juggins, Department for Education	<p>1. The Department for Education (DfE) welcomes the opportunity to contribute to the development of planning policy at the local level.</p> <p>2. Under the provisions of the Education Act 2011 and the Academies Act 2010, all new state schools are now academies/free schools and DfE is the delivery body for many of these, rather than local education authorities. However, local education authorities still retain the statutory responsibility to ensure sufficient school places, including those at sixth form, and have a key role in securing contributions from development to new education infrastructure. In this context, we aim to work closely with local authority education departments and planning authorities to meet the demand for new school places and new schools. We have published guidance on securing developer contributions for education, at https://www.gov.uk/government/publications/delivering-schools-to-support-housing-growth. You will also be aware of the corresponding additions to Planning Practice Guidance on planning obligations, viability and safe and healthy communities.</p> <p>6. The National Planning Policy Framework (NPPF) advises that local planning authorities (LPAs) should take a proactive, positive and collaborative approach to ensuring that a sufficient choice of school places is available to meet the needs of communities and that LPAs should give great weight to the need to create, expand or alter schools to widen choice in education (para 94).</p> <p>7. DfE supports the principle of LBRuT safeguarding land for the provision of new schools to meet government planning policy objectives as set out in paragraph 94 of the NPPF. When new schools are developed, local authorities should also seek to safeguard land for any future expansion of new schools where demand indicates this might be necessary, in accordance with Planning Practice Guidance and DfE guidance on securing developer contributions for education (https://www.gov.uk/government/publications/delivering-schools-to-support-housing-growth). We would be happy to share examples of best practice.</p> <p>8. LBRuT should also have regard to the Joint Policy Statement from the Secretary of State for Communities and Local Government and the Secretary of State for Education on Planning for Schools Development (https://www.gov.uk/government/publications/national-planning-policy-framework-2) (2011) which sets out the government's commitment to support the development of state-funded schools and their delivery through the planning system.</p> <p>9. In light of the above and the Duty to Cooperate on strategic priorities such as community infrastructure (NPPF para 24-27)(NPPF paragraph 24-27 specifies that this collaborative working should include infrastructure providers), DfE encourages close working with local authorities during all stages of planning policy development to help guide the development of new school infrastructure and to meet the predicted demand for primary and secondary school places. Please add DfE to your list of relevant organisations with which you engage in preparation of the plan.</p> <p>10. Please note that there are two routes available for establishing a new school. Firstly, a local authority may seek proposals from new school proposers (academy trusts) to establish a free school, after which the Regional Schools Commissioner will select the successful trust. Under this 'local authority presumption route' the local authority is responsible for finding the site, providing the capital and managing the build process. Secondly, school proposers can apply directly to DfE during an application round or 'wave' to set up a free school. The local authority is less involved in this route but may support groups in pre-opening and/or provide a site. Either of these routes can be used to deliver schools on land that has been provided as a developer contribution. DfE has published further general information on opening free schools. (https://www.gov.uk/government/collections/opening-a-free-school)</p>

Respondent reference no.	Name / Organisation	Detailed comments
		<p>Site Allocations</p> <p>11. Site allocations and/or associated safeguarding policies should seek to clarify requirements for the delivery of new schools, including when they should be delivered to support housing growth, the minimum site area required, any preferred site characteristics, and any requirements for safeguarding additional land for future expansion of schools where need and demand indicates this might be necessary. It is important that social infrastructure is in the right place at the right time to support population growth.</p> <p>12. Viability assessment should inform options analysis and site selection, with site typologies reflecting the type and size of developments that are envisaged in the borough/district. This enables an informed judgement about which developments would be able to deliver the range of infrastructure required, including schools, leading to policy requirements that are fair, realistic and evidence-based. In accordance with Planning Practice Guidance, there should be an initial assumption that applicable developments will provide both land and funding for the construction of new schools. The total cumulative cost of complying with all relevant policies should not undermine deliverability of the plan, so it is important that anticipated education needs and costs of provision are incorporated at the outset, to inform local decisions about site selection and infrastructure priorities (PPG on viability and planning obligations: https://www.gov.uk/government/collections/planning-practice-guidance).</p> <p>13. While it is important to provide this clarity and certainty to developers and the communities affected by development, retaining a degree of flexibility about site specific requirements for schools is also necessary given that the need for school places can vary over time due to the many variables affecting it. DfE therefore recommends the Council consider highlighting in the next version of the Local Plan that:</p> <ul style="list-style-type: none"> - specific requirements for developer contributions to increasing capacity of existing schools and the provision of new schools for any particular site will be confirmed at application stage to ensure the latest data on identified need informs delivery; and that - requirements to deliver schools on some sites could change in future if it were demonstrated and agreed that the site had become surplus to requirements, and is therefore no longer required for school use. <p>Evidence Base</p> <p>14. It would be good practice for LBRuT to continually monitor the position with regards to pupil places and school delivery, as part of ensuring the Infrastructure Delivery Plan is up to date, setting out clearly how the forecast housing growth at allocated sites has been translated (via an evidence based pupil yield calculation) into an identified need for specific numbers of school places and new schools over the plan period, and also how this compares to what has been delivered practically. This would help to demonstrate that the approach to the planning and delivery of education infrastructure is justified based on proportionate evidence, and also to ensure that approaches can be flexible and resilient to changes in circumstances and the reality of the delivery of housing.</p>
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	Schools need to be located within their catchment areas with space them to allocated in the local plan. A full public sequential site search process should be undertaken to identify new sites so that the selection is as open and democratic as possible.
31	Tim Catchpole on behalf of MESS	We are over-provided with primary school places and possibly also with secondary school places given the significant decline in the birth rate since 2012.
33	Tim Catchpole on behalf of the Mortlake Brewery Community Group	<ol style="list-style-type: none"> 1. Don't over-react when there is a sudden dramatic increase in births - like there was in 2008-2012. We have witnessed strenuous attempts by the Council to respond to this by providing a huge increase in school places, but it has turned out to be a bulge and the birth rate since 2012 has been falling steadily. Primary schools are now experiencing a significant decline in numbers and the latest ONS population projections (published 24 March 2020) show that the population of 11-year-olds in Richmond will peak in 2021 (and in neighbouring boroughs in 2023) and then go into significant decline. 2. Don't support the development of a new secondary school on an inappropriate site just because it is being offered by the DfE with all expenses paid. Recognise that while over-provision of primary or lower secondary school places does not damage the educational offer, over-provision post-16 could prevent existing schools from achieving viable 6th forms (indeed a new school might not be able to achieve viability of its own 6th form). Instead, negotiate with the DfE to allow existing secondary schools to expand in order to achieve such viability and get the DfE to fund such expansion. 3. If, and <i>only if</i>, a new school is really needed, then make sure the right site is selected using the ten criteria set out in the Mayor's New London Plan covering accessibility by public transport, linkages to pedestrian/cycle networks, proximity to open space, etc, supplemented with additional criteria covering impact on

Respondent reference no.	Name / Organisation	Detailed comments
		existing schools and on protected land, noting that MOL is no longer sacrosanct. The case for the new school must be robust and evidenced (as requested by the GLA). 4. Carry out more detailed research into the percentage of pupils going into independent education in different areas of the borough, and the factors affecting this choice. It is not adequate to apply a fixed percentage of the state primary-school leavers, across large areas of the borough. 5. Do not accept that, just because secondary schools and colleges are no longer funded by the Local Authority, the authority has no responsibility for asserting what their role should be in relation to one another. In particular, it has a duty to do what it can to ensure on behalf of residents that there is the best possible <u>pattern</u> of educational provision, particularly post-16 where an adequate range of courses should be reliably available. This is not the case at present.
41	Anthony Swan	Restrict new builds
42	Jeremy Gill	Build some schools.
44	Roger Cutler	Inject more money by reducing the money you waste elsewhere eg. yet more plans & expenditure on Twickenham Riverside which works fine as it is.
45	Sally Beeson	Find a site on which to build a new school - local authorities should have the power to overrule proposed planning for flats for this reason. Also to expand existing school buildings as long as playgrounds and playing fields are not built upon and reduced in size, which has been the fate of many of our local schools. Use adjacent boroughs' schools if their school places aren't filled
46 (a)	Joan Gibson	School places. There are a number of schools that can be expanded. Twickenham School, Hampton High, Heathfield school, Nelson school is 30 pupils down etc. etc. You need to stop your policy of expanding via new schools. This is removing potential sites from housing development and worse still removing green sites from Richmond. Your policy should be to expand on current school brown field sites rather than open new schools. This also ensures the school places are in the area of need so encourages active travel.
53	Richard Woolf on behalf of McDaniel Woolf Architects	The borough is providing new schools . The new school places will respond in the future to an increasing population. No doubt relocation of metropolitan open land by Richmond Council will take place, as happened at the Russell School in Petersham. With this site, a new school was built in an inappropriate location, against local opposition and with poor strategic thinking. If precious MOL and place space is to be lost, please learn from the Russell project on what not to do.
55	Jon Rowles	1) The council can use its influence to amend catchment areas. Currently, around a third of secondary school places are taken up by out of borough pupils and this is also causing a lot of extra congestion and pollution. 2)The council need to find sites for new schools and reserve them using the local plan process as most local authorities do. 3) Schools must be located in their main catchment area to make them sustainable
56	Rob Kennedy, Environment Agency	By building more schools or expanding existing schools.
63	Carol Rawlings	Expand the current private provision by providing free school places for children.
69	Geoff Bond on behalf of Ham and Petersham Association	Only introduce additional need where the school places can be satisfied. Do not over stretch existing schools but use existing capacity elsewhere by focusing development near this capacity.
Should we encourage more community uses in borough centres?		
Of respondents who answered the question: 19 said yes, 1 said no and 2 don't know [16 did not answer the question]		
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	<i>[Should they be encouraged as part of larger or mixed-use developments?]</i> Depends on the size of the town centre – it could jeopardise the viability of smaller town centres to lose even more units. Should consider making it easier for gym chains to open up in our town centres. It easier to open up a vape store or cake shop than open a facility that improves peoples health.
31	Tim Catchpole on behalf of MESS	Not necessarily in the borough centres - churches provide floorspace for community uses.
41	Anthony Swan	Should be encouraged anywhere

Respondent reference no.	Name / Organisation	Detailed comments
42	Jeremy Gill	Possibly, first sensible question you've asked
44	Roger Cutler	Whatever works best. Must be versatile.
56	Trevor Rowntree	But the community uses should ensure they are for the whole community and not be exclusively for use for a subsection of the community.
48	Roger Wilson on behalf of Roger Wilson Consulting LLP	Both
53	Richard Woolf on behalf of McDaniel Woolf Architects	I'm not sure who 'community' is ??
55	Jon Rowles	But not at the expense of retail.
63	Carol Rawlings	Mixed us
Should there be increased public access to school facilities?		
Of respondents who answered the question: 17 said yes, 2 said no and 3 don't know [16 did not answer the question]		
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	All new school developments should have a community use agreement for access to sports facilities, classrooms, etc – so should the demand arise in the future it can be accommodated. With schools increasing separate from the council, these agreements will need to be more formalised in the future.
31	Tim Catchpole on behalf of MESS	Schools have become like fortresses, so this may be unrealistic.
42	Jeremy Gill	Evening classes
44	Roger Cutler	Once again, more expenditure.
45	Sally Beeson	I think they are used already, and there comes a tipping point whereby the school isn't for the children alone, which I think it should be. It's a special and safe place for many and security could be compromised.
46 (a)	Joan Gibson	Not unless you are going to provide the staff to run them out of hours - schools cannot afford this
48	Roger Wilson on behalf of Roger Wilson Consulting LLP	Including independent schools
51	Su Bonfanti	I support the idea of 'increased public access to school facilities'. We're about to have a whole new school - the biggest bit of infrastructure in East Twickenham for years - and it would be good for it to be well used.
52	Winston W Taylor	The school facilities should be available to the public.
53	Richard Woolf on behalf of McDaniel Woolf Architects	I feel access is well served with many schools. Not sure we have a challenge ?
55	Jon Rowles	There needs to be community use agreements for not just sports facilities but the classrooms too.
63	Carol Rawlings	School swimming pools should be available for public use at weekends and holidays.
64	Johanna Eschbach on behalf of Richmond Bridge Residents Association	Yes where relevant and if it doesn't generate more disruptions from nearby residents.

Respondent reference no.	Name / Organisation	Detailed comments
69	Geoff Bond on behalf of Ham and Petersham Association	Extend the K5 to Grey Court School. Discourage teachers from driving to school
General comments relating to this topic area		
4	Lambert Smith Hampton on behalf of Metropolitan Police Service	<p>Section 106/CIL contributions to mitigate impact on crime</p> <p>We are pleased to see that Richmond Council references ‘policing and other criminal justice or community safety facilities’ as social infrastructure within the adopted Local Plan. As noted in our representation to the Richmond Planning Obligations SPD Consultation in January 2020, the MPS have to move towards securing S106/CIL from development due to the impacts on crime. The MPS would like to have the ability to receive financial contributions in due course and are in the process of working up a formula linking to development impacts which should be available soon.</p> <p>A breakdown of non-property related infrastructure sought by the MPS in the future is detailed below. This list has been taken from other Police and Crime Commissioners who are already receiving financial contributions;</p> <ul style="list-style-type: none"> • Staff set up costs <ul style="list-style-type: none"> - Uniforms. - Radios. - Workstation/Office equipment. - Training. • Vehicles <ul style="list-style-type: none"> - Patrol vehicles. - Police community support officers (PCSO) vehicles. - Bicycles. • Mobile IT: The provision of mobile IT capacity to enable officers to undertake tasks whilst out of the office in order to maintain a visible presence. • CCTV technologies: Automatic Number Plate Recognition (ANPR) cameras to detect crime related vehicle movements. • Police National Database (PND): Telephony, licenses, IT, monitoring and the expansion of capacity to cater for additional calls. <p>Text secured within the draft Wandsworth Planning Obligations SPD</p> <p>The MPS have secured the following text within the draft Wandsworth Planning Obligations SPD;</p> <p>‘The impact of large-scale development on the Metropolitan Police has funding implications, and it is widely accepted that policing infrastructure can be included within CIL and s106 obligations. S106 infrastructure is not limited to buildings and could include equipment such as surveillance infrastructure, CCTV; staff set up costs, vehicles, mobile IT and Police National Database. The Metropolitan Police is currently preparing a calculation formula to enable collection of financial contributions and this will be used when available by the Council’.</p>
14	Mayor of London	The themes regarding new social and community infrastructure, creating safe, healthy and inclusive communities are closely aligned with the Mayor’s Good Growth Objective GG1, Building strong and inclusive communities. The intended approach is welcome.
18	Phoebe Juggins, Department for Education	<p>5. DfE welcomes reference within the plan to support the development of appropriate social and community infrastructure on p12.</p> <p>Location of Social Infrastructure</p> <p>15. As set out above, site allocations for educational uses (new schools and facilities as well as expansions) should be robustly evidence-based and ensure that the plan is positively prepared. It is also important that there is a positive planning policy framework to ensure that education provision can come forward during the plan period expediently, to respond flexibly to need and demand.</p> <p>16. It can be challenging for sites to be identified for the delivery of social and community infrastructure, including education uses. DfE would recommend that LBRuT does not take an onerous position requiring significant policy tests to be met for changes of use from other land uses to social and community uses (including education). For example, marketing evidence requirements for releasing land can lead to social infrastructure and education uses being unable to be delivered in line</p>

Respondent reference no.	Name / Organisation	Detailed comments
		<p>with need and demand. It is important that there is flexibility within types of social infrastructure to enable best value for money for public services and agencies delivering these.</p> <p>17. Such policy requirements can also be challenging to the public sector/third sector organisations required to meet the tests, given the intensity of resource and timescales involved. This places additional burden on such organisation who are already frequently stretched and need to be able to realise value for money and efficiency.</p> <p>18. All new development can cumulatively impact on the requirement for social infrastructure facilities, not just <i>large</i> new development as referenced on page 55. DfE therefore recommends that a policy approach be developed to ensure that all development which either standalone, or in conjunction with other planned or proposed development, is assessed to ensure that proportionate contributions are secured to mitigate any impact that may arise. This could be contributions towards existing facilities' expansion or enhancement, or a proportionate contribution towards new provision.</p>
18	Phoebe Juggins, Department for Education	<p>Forward Funding</p> <p>23. DfE loans to forward fund schools as part of large residential developments may be of interest, for example if viability becomes an issue. Please see the Developer Loans for Schools prospectus for more information (The Developer Loans for Schools prospectus is available here -https://www.gov.uk/government/publications/developer-loans-for-schools-apply-for-a-loan). Any offer of forward funding would seek to maximise developer contributions to education infrastructure provision while supporting delivery of schools where and when they are needed.</p> <p>Developer Contributions and Community Infrastructure Levy (CIL)</p> <p>24. One of the tests of soundness is that a Local Plan is 'effective', meaning the plan should be deliverable over its period. In this context and with specific regard to planning for schools, there is a need to ensure that education contributions made by developers are sufficient to deliver the additional school places required to meet the increase in demand generated by new developments. DfE notes that LBRuT will be producing an Infrastructure Delivery Statement which will reflect Local Plan priorities (set out on page 59), and that the Council may also wish to review CIL rates to ensure appropriate rates are levied and the right infrastructure is secured across the borough.</p> <p>25. Where additional need for school places will be generated by housing growth, the Infrastructure Delivery Statement should identify the anticipated CIL and Section 106 funding towards this infrastructure. The statement should be reviewed annually to report on the amount of funding received via developer contributions and how it has been used, providing transparency to all stakeholders.</p> <p>26. Local authorities have sometimes experienced challenges in funding schools via Section 106 planning obligations due to limitations on the pooling of developer contributions for the same item or type of infrastructure. However, the revised CIL Regulations remove this constraint, allowing unlimited pooling of developer contributions from planning obligations and the use of both Section 106 funding and CIL for the same item of infrastructure. The advantage of using Section 106 relative to CIL for funding schools is that it is clear and transparent to all stakeholders what value of contribution is being allocated by which development to which schools, thereby increasing certainty that developer contributions will be used to fund the new school places that are needed. DfE supports the use of planning obligations to secure developer contributions for education wherever there is a need to mitigate the direct impacts of development, consistent with Regulation 122 of the CIL Regulations.</p> <p>27. We also request a reference within the Local Plan's policies or supporting text to explain that developer contributions may be secured retrospectively, when it has been necessary to forward fund infrastructure projects in advance of anticipated housing growth. An example of this would be the local authority's expansion of a secondary school to ensure that places are available in time to support development coming forward. This helps to demonstrate that the plan is positively prepared and deliverable over its period.</p> <p>28. DfE would be particularly interested in responding to any update to the Infrastructure Delivery Plan/Infrastructure Funding Statement, viability assessment, Obligations SPD or other evidence relevant to education which may be used to inform local planning policies and CIL charging schedules. As such, please add DfE to the database for future consultations on relevant plans and proposals.</p> <p>Conclusion</p> <p>29. Finally, I hope the above comments are helpful in shaping LBRuT's Local Plan, with regard to the provision of a policy approach, site allocation and contributions strategic to securing school places. Please advise DfE of any proposed changes to the approach to emerging Local Plan policies, supporting text, site allocations and/or evidence base arising from these comments.</p>

Respondent reference no.	Name / Organisation	Detailed comments
22	Jimmy Wallace, Richmond Athletic Association	<p>We are fully supportive of the borough's intention to update the following aspects of its evidence base as outlined on p. 54:</p> <ul style="list-style-type: none"> • Indoor Sports Facility Needs Assessment; • Playing Pitch Assessment; • Playing Pitch Strategy; and • Open Space Assessment <p>We would welcome the opportunity to input into the development of these strategies and assessments, particularly in the context of our emerging masterplan for the enhancement of the existing facilities at the Richmond Athletic Ground.</p> <p>We also note the various policy directions, including the support for the enhancement of existing land and facilities for sport and playing fields, and we look forward to reviewing the detailed policies as these emerge in draft.</p>
27	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond	We support the essential provision of schools, care and other community facilities.
<p>Creating safe, healthy and inclusive communities</p> <p>Do you agree with the proposed policy directions?</p> <p>Of respondents who answered the question: 15 said yes, 4 said no and 3 don't know [16 did not answer the question]</p>		
20	Gary Backler, Friends of the River Crane Environment.	<p>Again, we welcome the inclusion of this theme and its prioritisation, but again we are concerned that the emphasis is inappropriate. As set out, the policy places importance on aspects such as Healthy Streets, fastfood outlets, sports and health facilities. This is inadequate: for example, "providing access to sports centres and recreation facilities" (p58) that require user payments risks being regressive and exclusionary in both health and financial terms.</p> <p>We believe that greater emphasis should be placed on the role that the borough's open and wild spaces can play in creating safe, healthy and inclusive communities, as well as in improving air quality and promoting physical and mental health. These open spaces should be accessible to communities without the need to overcome severance obstacles. They should not be over-exploited and degraded by excess demand. They should be freely available to the public. Crucially, the policy needs to recognise that these open spaces should be of high – and improving – quality, with the commitment that safety, cleanliness, reduction in crime and anti-social behaviour, management and maintenance will have equal priority for the open spaces as for the built environment.</p> <p>We help to support three TCV Green Gyms in the borough, provide a programme of Walks & Talks and conduct usage surveys which quantify the use made of some of the borough's open spaces. There is considerable work of this nature being done by a network of volunteer based organisations across the borough and we believe this work needs to be more actively supported by the council. Organisations such as South West London Environment Network help to support and co-ordinate these activities, working with a network of over 70 friends groups across the borough.</p>
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	Need to ensure that public health is an official consultee – par the Lib Dem Manifesto.
37	John Waxman, Crane Valley Partnership	Furthermore the revised Local Plan must recognise that convenient access to a Borough-wide network of connected high quality open spaces offers significant benefits to residents - for example in terms of enhanced health and well-being and opportunities for sustainable travel.
46 (a)	Joan Gibson	Health – I feel your summary of what is causing ill health in Richmond, high levels of obesity and risky behaviour in adolescents misses out the reasons. You seem to only blame it on smoking, alcohol drinking, drug taking and air quality. I live in a middleclass area of Whitton, both adults in our household are fit and healthy for our age, and our child is normal weight fit and healthy, and does not drink. We drink more than 14 units a week, used to smoke and breath in poor air quality so should not be fit and healthy. We have neighbours who are must less fit and healthy, and have overweight children but do not drink as much as we do. You need to get to

Respondent reference no.	Name / Organisation	Detailed comments
		the bottom of what is making these families less fit despite less alcohol and the same air quality. If you do not understand why you will fail to put the right changes in place.
48	Roger Wilson on behalf of Roger Wilson Consulting LLP	Promote walking, public transport and cycling. Stop use of cars and vehicles across the Borough.
55	Jon Rowles	A lot of health inequalities are down to 'cold houses' and more need to be done to ensure that the poor and elderly are not in substandard housing.
64	Johanna Eschbach on behalf of Richmond Bridge Residents Association	There needs to be a greater focus on mental health in context of general wellbeing of residents in the borough. Noise disruption is high and is not given any focus when considering new developments. The borough needs to include noise pollution as a key issue in the borough (likely to increase if Heathrow 3rd runway goes ahead). In East Twickenham, our high street is very noisy (vehicles, businesses operating, buses, etc.) and we are also plagued by heavy air traffic. This could become a significant health issue beyond obesity, etc. which are already tackled by national policies.
65	SSA Planning Limited on behalf of Kentucky Fried Chicken (Great Britain) Limited	Numerous studies (Marmot, Michael et al; (2010) 'Fair Society, Healthy Lives' The Strategic Review of Health Inequalities in England post-2010, p.132 and Williams, J et al (2014) 'A systematic review of the influence of the retail food environment around schools on obesity-related outcomes ' Obesity Reviews 15, p.374) have found no or conflicting evidence for any effect of the food environment around schools on childhood obesity. Controlling the primary school environment is particularly problematic as there is neither correlation nor mechanism, since pupils may not leave unattended.
69	Geoff Bond on behalf of Ham and Petersham Association	The most popular way to improve health is by recreational walking. By improving the areas used for recreation walking, such as the Avenues in Ham and Petersham more people will walk. You don't need buildings for this
Should it be easier to change use from other land uses to community uses?		
Of respondents who answered the question: 9 said yes, 2 said no and 7 don't know [20 did not answer the question]		
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	Some "community uses" don't have much local community value. There is a unit in Whitton which is occupied by a postal pharmacy and thus could be located anywhere and just removes a retail unit.
41	Anthony Swan	Buildings then yes
44	Roger Cutler	Depends on need.
55	Jon Rowles	Depends what the use is. School use could be very controversial and cause lots of pollution.
63	Carol Rawlings	Unused retail spaces should be changed to community use.
68 (a)	Mark Jopling	Yes though not green space unless related to functional use of that green space
68 (b)	Mark Jopling	Yes though anything built on green space must be related to the function of the green space
Should policy strongly resist more takeaways in areas in proximity to schools?		
Of respondents who answered the question: 15 said yes, 2 said no and 2 don't know [19 did not answer the question]		
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	Some council go further and ban additional all additional takeaways in wards where childhood obesity is above a certain level. The council could also try and reduce adverting on and around fast food units – as its walking past what are effectively bill-boards promoting bad eating which is the biggest part of the problem The council could look at preventing banner advertising on barriers around outside eating areas, and posters that are allowed in the window. The council should consider wider restrictions to prevent what Unicef call 'food swamps' from developing. In some wards we are in danger of seeing the majority of children eating poor diets. Please see this link https://www.unicef.org.uk/press-releases/poor-diets-damaging-childrens-health-warns-unicef/
41	Anthony Swan	Provide free school lunches where students can sit and talk...like in France. No phones allowed on!
44	Roger Cutler	But money talks.
45	Sally Beeson	Absolutely, the obesity figures speak for themselves!

Respondent reference no.	Name / Organisation	Detailed comments
52	Winston W Taylor	Health; behaviour
53	Richard Woolf on behalf of McDaniel Woolf Architects	Although I support the principle , I also feel this is a democracy. I know chip-shops opposite school gates isn't ideal , but I would prefer democracy over calories. Sorry, not very PC.
55	Jon Rowles	The planning inspector is undermining the current policy, so many look into also having a bar on new takeaways where over a certain percentage of children are overweight (which is also commonly used).
63	Carol Rawlings	Encourage healthy eating. Discourage confectionery, fast food and chips!
65	SSA Planning Limited on behalf of Kentucky Fried Chicken (Great Britain) Limited	Banning a specific type of food and drink use within effectively random areas rather than the total number or proportion of all food and drink premises, is unlikely to be beneficial, but likely to contradict wider retail policy by reducing accessibility and therefore footfall, vitality and, ultimately, viability. Recent evidence (Robinson, E et al, 2018. '(Over)eating out at major UK restaurant chains: observational study of energy content of main meals' BMJ 2018 (363) 4982) demonstrates that over-consumption is possible at premises and brands within a wide range of planning use classes, so that action to improve, rather than restrict, the offer is required across all uses where food and drink are sold, particularly where this is for immediate consumption.
Do you have any other suggestions on how planning can promote or contribute to creating places and an environment that is conducive to weight loss and active lifestyles?		
10	Stuart Morgans, Sport England	<p>Sport England has an established role within the planning system which includes providing advice and guidance on all relevant areas of national, regional and local policy as well as supporting local authorities in developing the evidence base for sport.</p> <p>Sport England aims to ensure positive planning for sport, enabling the right facilities to be provided in the right places, based on robust and up-to-date assessments of need for all levels of sport and all sectors of the community. To achieve this our planning objectives are to seek to PROTECT sports facilities from loss as a result of redevelopment; to ENHANCE existing facilities through improving their quality, accessibility and management; and to PROVIDE new facilities that are fit for purpose to meet demands for participation now and in the future.</p> <p>We work with the planning system to achieve these aims and objectives, seeking to ensure that they are reflected in local planning policies, and applied in development management. Please see our website for more advice: http://www.sportengland.org/facilities-planning/planning-for-sport/</p> <p>Protecting playing fields and other sport facilities</p> <p>Sport England is keen to ensure that there is a relevant policy within any new Local Plan in order to ensure that both indoor and outdoor sport facilities are adequately protected in line with both the London Plan (Intend to Publish version 2019) and the NPPF 2019.</p> <p>I note that the existing Richmond Local Plan LP31 states that playing fields and sports facilities should be protected and where possible enhanced. However, both national policy and the London plan reference specific exceptions to this. A new Local Plan should consider bringing this policy into line with the NPPF and London Plan.</p> <p>National policy currently states: Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless: a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or b) 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 c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.</p> <p>The London Plan (Intend to Publish 2019) states: Existing sports and recreational land (including playing fields) and facilities for sports and recreation should be retained unless: 1) an assessment has been undertaken which clearly shows the sports and recreational land or facilities to be surplus to requirements (for the existing or alternative sports and recreational provision) at the local and sub-regional level. Where published, a borough's assessment of need for sports and recreation facilities should inform this assessment; 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.</p>

Respondent reference no.	Name / Organisation	Detailed comments
		<p>Sport England considers that this is an excellent opportunity to ensure that any new Local Plan is compliant with both the London Plan and NPPF. Sport England are likely to object if the relevant policies in the new Local Plan are inconsistent with the guidance contained within the NPPF (particularly para 97), and Sport England's Playing Fields Policy (see attached link). https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#playing_fields_policy</p> <p>Sport England may also wish to comment further on any policy that relates to protecting sport following the Inspectors decision into the Udney Park Road appeal Inquiry, where the implications of Richmond's existing policy around sport facilities may well become clearer.</p> <p>New provision Sport England supports the element of policy LP31 relating to provision to meet the needs of major development, as it references assessing need in line with the Borough's Playing Pitch Strategy (PPS). Sport England suggests that a revised policy should identify a mechanism for calculating demand from new developments and set out how this is to be applied to establish the level of onsite/off-site provision for both indoor and outdoor facilities. For example, the use of Sport England's Sports Facility Calculator and New Playing Pitch Calculator, which provide a useful starting point to demonstrate demand generated by new housing development. Should an on-site contribution not be deemed appropriate, the policy should provide for an off-site contribution. The Playing Pitch Strategy Action Plan should to be used to identify sites requiring investment where appropriate.</p> <p>Evidence base I note that the Council benefits from a relatively recent PPS updated in 2018; now is a good opportunity to consider beginning the process of updating this document in order to ensure that the information in it remains robust and up-to-date in accordance with para 96 of the NPPF. I further note that the Council has not updated its evidence base with regard to indoor facilities since 2015 and would therefore strongly encourage that the Council develop an updated/new Built Facilities Strategy (BFS). It is essential that the Council has an up-to-date PPS and BFS in order to ensure that the new Local Plan evidence base in order to comply with national policy guidance. The lack of an up to date evidence could lead to the new Local Plan being found to be unsound.</p> <p>Health and wellbeing – Active Design Sport England believes the new Local Plan would benefit by specifically referencing Sport England's Active Design Guidance, with the recommendation that future design proposals follow its principles. Sport England and Public Health England have refreshed our 'Active Design' guide which provides some really useful advice and case studies with clear reference to the NPPF to maximise the opportunities for design in physical activity. Sport England would commend this to you and suggest the concept of 'Active Design' be incorporated into policy and any new developments – please see website extract and link below:</p> <p>Active design We believe that being active should be an intrinsic part of everyone's daily life – and the design of where we live and work plays a vital role in keeping us active. Good design should contribute positively to making places better for people and create environments that make the active choice the easy choice for people and communities. That's why Sport England, in partnership with Public Health England, has produced the Active Design Guidance. This guidance builds on the original Active Design (2007) objectives of improving accessibility, enhancing amenity and increasing awareness, and sets out the Ten Principles of Active Design.</p> <p>Ten principles The ten principles have been developed to inspire and inform the layout of cities, towns, villages, neighbourhoods, buildings, streets and open spaces, to promote sport and active lifestyles. The guide features an innovative set of guidelines to get more people moving through suitable design and layout. It includes a series of case studies setting out practical real-life examples of the principles in action to encourage planners, urban designers, developers and health professionals to create the right environment to help people get more active, more often.</p>

Respondent reference no.	Name / Organisation	Detailed comments
		<p>The Active Design Principles are aimed at contributing towards the Government's desire for the planning system to promote healthy communities through good urban design.</p> <p>Active Design has been produced in partnership with David Lock Associates, specialists in town planning and urban design. http://sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/active-design</p>
18	Phoebe Juggins, Department for Education	<p>Open space and recreation</p> <p>19. The NPPF (2019) sets out at paragraph 97 that:</p> <p>97. Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:</p> <p>a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or</p> <p>b) 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</p> <p>c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.</p> <p>20. It is important that the LBRuT Local Plan allows flexibility to allow the provision of educational facilities, where there is a clear overall benefit in terms of enhanced facilities provision (taking into account local needs), despite a limited loss in the quantity of existing facilities, such as a new school providing indoor and outdoor facilities for sport of significantly improved <i>quality</i>, accessibility and availability for shared use by the local community (secured through a community use agreement if appropriate). It should be acknowledged that enhancements can take the form of both quality as well as quantity and as such, any quantitative loss may be more than compensated by qualitative enhancements. This flexibility will enable greater benefits to health and wellbeing.</p> <p>21. Any future policy should comply with the NPPF.</p> <p>22. DfE additionally notes that LBRuT intends to produce/update relevant evidence base in relation to playing pitches and open space, and therefore we suggest that assessments (in accordance with the proposed abovementioned point regarding policy direction) should consider qualitative factors (for both existing condition and proposed need) as well as the quantity of open space in existence and proposed. This will ensure that the policy approach is founded on robust and comprehensive evidence.</p>
22	Jimmy Wallace, Richmond Athletic Association	We endorse the proposed policy directions to support the creation of safe, healthy and inclusive communities. Particularly, we fully endorse the borough's prioritisation of healthy communities and we recognise the opportunity for the enhancement of the Richmond Athletic Ground facilities to contribute to meeting this priority through the provision of improved sport and recreation facilities.
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	<p>Some new developments don't have pavements and people have to walk on the roadway. Whilst this may slow cars down, it also means that parents are more reluctant to let their children travel unaccompanied.</p> <p>[See photo in Appendix]</p> <p>Arden Close in Whitton – and example of lack of pavements discouraging exercise</p> <p>The Infrastructure Delivery Plan notes that membership at fitness clubs is falling and that borough residents are now traveling outside of the borough to access no-frills gyms (such as the gym group Hounslow where monthly subs are £18.99 with no contract) compared to the legacy chains like Virgin Active Twickenham (£99 per month for a 12 month contract), Nuffield Health Twickenham (£69.00 per month for a 12 month contract) and David Lloyd (£120 per month for a 12 month contract + 3 month notice to cancel). We recommend that council look to ensure that more low-cost gyms can be set up in the borough.</p>
31	Tim Catchpole on behalf of MESS	No, the Borough is well provided with space for a healthy life style. Certain residents appear not be taking advantage of them?
41	Anthony Swan	Yes..protected bike lanes. Use school gyms for sport clubs.
42	Jeremy Gill	Not your concern at all
44	Roger Cutler	More money needs to be spent on health. The availability of prescription drugs should be improved rather than money spent on weight loss & active lifestyles. Existing basic care needs money before those things
45	Sally Beeson	Playgrounds and school playing fields are vitally important Keep our open spaces green
46 (a)	Joan Gibson	I recommend you look at: Diet – how many calories and what sort of calories these families eat. Do parents pickup children from school and give them a chocolate bar, do the children get

Respondent reference no.	Name / Organisation	Detailed comments
		<p>driven to school, does the whole family rely on cars, how big are their portions, is the child addicted to fats and sugar etc. etc. A child / adult that gets obese finds it hard to exercise. Why are teenagers in Richmond drinking more than average? Lack of self-esteem??, lack of hobby or interest caused be lack of self-esteem?? It tends not to be lack of opportunities as Richmond has a huge leisure offer and schools give children all they could possibly dream of.</p> <p>To get people more active you need to focus on separate walking, public transport and cycling routes with cars given limited routes. This needs to be for ALL areas of Richmond (not just the ones where people walk and cycle a lot now). In fact, priority needs to be given to those areas with the least active travel.</p> <p>I like that you want to engage with youth. However, the youth parliament which is full of successful and motivated teenagers will not have a clue what makes children obese, drink, smoke and take drugs. You need to engage the children who have the problems you want to fix too.</p> <p>Your plans around this issue have missed out changes to roads to promote active travel both walking and cycling / scootering.</p> <p>Unhealthy takeaways should be resisted – currently your policy is failing with a KFC and Dominos coming to Whitton High Street with 2000+ school children in close proximity. This needs fixing.</p>
48	Roger Wilson on behalf of Roger Wilson Consulting LLP	Promote walking, public transport and cycling. Stop use of cars and vehicles across the Borough.
52	Winston W Taylor	Making car travel more difficult through parking restrictions. Providing facilities (in the widest sense) promoting active lifestyles easily accessed by residents, An example where this does not work - Teddington Sports Centre at Teddington School. This centre is not accessible to me and I am sure a number of Teddington residents. There is no public transport so you have to use a car and pollute the atmosphere or not use it at all.
53	Richard Woolf on behalf of McDaniel Woolf Architects	I would strongly support cycle and foot bridges to get residents connecting across the borough rather than slogging over traffic clogged road bridges.
54	Paul Luton	Low traffic neighbourhoods.
55	Jon Rowles	1) Need to make the public health director a consultee on planning applications as par the Lib Dem Manifesto.
56	Rob Kennedy, Environment Agency	The encouragement of outside gyms in public parks.
59	Paul Massey	More cycle docking/parking areas
63	Carol Rawlings	Use school buildings for community use in evenings, at weekends and during school holidays.
65	SSA Planning Limited on behalf of Kentucky Fried Chicken (Great Britain) Limited	Fundamentally, delivering adequate housing with sustainable access to jobs and facilities, including open space and recreation is the key means by which planning can promote health. Ensuring a healthy mix of uses in town centres and of lower-order uses across out-of-centre geographies also promotes retail and public health.
68 (a)	Mark Jopling	Not appropriate to specify "weight loss" as a Policy goal, active lifestyle is sufficient description.
68 (b)	Mark Jopling	Weight loss is inappropriate as a Policy goal, active lifestyle is sufficient.
69	Geoff Bond on behalf of Ham and Petersham Association	Make sure it is harder to convert playing fields. Make sure people can travel to sports facilities, this will include driving to them in some instances
Are there other opportunities through planning to promote healthy lifestyles?		
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	<p>Public Health England has noted that "Some of the UK's most pressing health challenges - such as obesity, mental health issues, physical activity and the needs of an ageing population – can all be influenced by the quality of our built and natural environment...the considerate design of spaces and places can help to promote good health; access to goods and services; and alleviate, and in some cases even prevent, poor health and thereby have a positive impact on reducing health inequalities". Building Better Places'. Report of Session 2015-16. Written evidence (BEN0186) by Public Health England. House of Lords Select Committee on National Policy for the Built Environment</p> <p>We recommend that the council look at the Camden Planning Guidance: Planning for health and wellbeing.</p> <p>https://www.camden.gov.uk/documents/20142/4833316/CPG+Planning+for+health+and+wellbeing+March+2018.pdf/f84469ed-8fdd-67fb-bfea-c948f94dfcb4</p>

Respondent reference no.	Name / Organisation	Detailed comments
36	Tim Catchpole on behalf of MESS	See above.
37	John Waxman, Crane Valley Partnership	See above.
41	Anthony Swan	Jumping through hoops to obtain environment friendly planning permission
42	Jeremy Gill	No
44	Roger Cutler	It might be better to ensure planning doesn't produce unhealthy lifestyles. Education is most important of all . not more gyms. Stop allowing cyclists to injure people by cycling on the pavements.
45	Sally Beeson	Don't build lifts
46 (a)	Joan Gibson	The main way planning can help with health is separate walking and cycling infrastructure for all of Richmond (especially Whitton which has been completing left out of the current cycling and walking plans), and stopping unhealthy takeaways. The best way to improve exercise levels is to make it easier for Active travel to work or school. You could also work with traders to change how they layout their shops so healthy drinks and snacks are at eye level, put in footprints in train stations etc. to get people to walk upstairs, create active travel maps see https://www.newcastlecan.com/articles/metro-walking-map-the-step-by-stop-active-travel-guide , run school cookery courses to teach staff and pupils how to create healthy snacks and meals, lobby for changes to the cookery curriculum so only healthy food is cooked, write to businesses to get them to promote active travel, healthy eating by providing fruit to snack on and exercise breaks.
48	Roger Wilson on behalf of Roger Wilson Consulting LLP	Promote walking, public transport and cycling. Stop use of cars and vehicles across the Borough. There are many traffic jams and speeding, dangerous polluting vehicles across the Borough - ban them.
52	Winston W Taylor	See previous answer. I am sure there are others but no time.
53	Richard Woolf on behalf of McDaniel Woolf Architects	Accessible green open spaces , and not just the Royal Parks who take the brunt of the heavy lifting . Let's get our derelict common land and woodlands restored.
54	Paul Luton	See travel above.
55	Jon Rowles	- Ensure that new developments are permeable and link up - all too often roads are dead ends and or gated. This also increases the social isolation of the elderly which is also a health risk
63	Carol Rawlings	Swimming pools and the replacement of the old Richmond skating rink. The former could be provided by making school swimming pools open to the public when not in use.
65	SSA Planning Limited on behalf of Kentucky Fried Chicken (Great Britain) Limited	As a precautionary measure, not allowing changes of use to food and drink uses based on lack of viability in areas of deprivation may promote a healthier mix of uses in those area.
69	Geoff Bond on behalf of Ham and Petersham Association	Do more to protect areas from development that are used for recreation. I am less likely to walk down Great South Avenue for recreational purposes since the St Michael's Convent building or Petersham Avenue since the Russell School and German school buildings
How can we ensure convenient and welcoming development with no disabling barriers, providing independent access without additional undue effort, separation or special treatment?		
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	Need to ensure there is a segregated pedestrian access, there is secure cycle parking in a convenient and safe location, there is proper covered bin storage (to stop fly tipping).
31	Tim Catchpole on behalf of MESS	By liaising with the disadvantaged.

Respondent reference no.	Name / Organisation	Detailed comments
42	Jeremy Gill	Some facilities for disabled people that work.
44	Roger Cutler	Use better planners. Get better value for money.
46 (a)	Joan Gibson	Separated walking and cycling routes
48	Roger Wilson on behalf of Roger Wilson Consulting LLP	Promote walking, public transport and cycling. Stop use of cars and vehicles across the Borough.
52	Winston W Taylor	Not enough time to think about this.
53	Richard Woolf on behalf of McDaniel Woolf Architects	It's all down to good patronage , design lead development and long term over short term returns. The Building Regulations offer the practical side to this , and to be honest , the fact that the borough attracts developers who usually respond with high quality proposals should be acknowledged. How the borough responds to gated communities is a concern.
58	Michael Atkins, Port of London Authority	There must be continuing reference for riverside developments to provide riparian life-saving equipment where required and necessary, as stated in existing Local Plan policy LP 18 (River Corridors). The PLA also considers that there is need for suicide prevention measures in appropriate locations (such as CCTV and signage with information to access support) to be provided as part of new development along riverside areas where appropriate.
63	Carol Rawlings	Ban pavement parking. Make Richmond town centre traffic-free. River buses.
64	Johanna Eschbach on behalf of Richmond Bridge Residents Association	Towards implementation, infrastructure, delivery and sites
General comments relating to this topic area		
27	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond	We support measures to protect the health and well-being of the community. We urge the Council to continue its opposition to expansion of Heathrow and increased numbers of flights over the Borough and the consequential harm to people's health from noise and air pollution as well as the global issue of carbon emissions and climate change.
Call for Sites – General Views (see the details of sites put forward separate in the separate Schedule of all the Call for Sites Responses)		
Are there are any barriers to delivery, such as infrastructure constraints?		
Of respondents who answered the question: 11 said yes, said 1 no and 3 don't know [23 did not answer the question]		
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs	The value of sites is affected by transport links. More sites would become viable for redevelopment if the frequency of services on the railway were improved. We request the council lobby for the re-phasing of the Hounslow Loop and Windsor Service to restore the former 4 trains per hour – equally spaced out – metro style service. LBRUT is a member of South London Partnership who have a number of policies that should be feeding into the Local Plan. However there website is not being updated and there is a lack of transparency over its work. The NHS South London Partnership is also reshaping the delivery of services in South London (including LBRUT) though a Sustainability and Transformation Plan and this to should feed into the local plan https://www.swlondon.nhs.uk/our-plan/our-plan-for-south-west-london/ .However, many LBRUT residents are reliant upon services provided at West Middlesex Hospital which is covered by the North West London Partnership – and there is a possibility that we are falling between two stalls. https://www.healthiernorthwestlondon.nhs.uk/sites/nhsnwondon/files/documents/nwl_stp_submission_summary_october_2016v2.pdf The LBRUT will also need to keep a watching brief on the proposal for the West London Orbital Railway, could it result in less services for Whitton Station. Alternatively, is there an opportunity for it to be extended to Twickenham or Feltham, both alternatives may serve LBRUT better? This is the link to the business case http://content.tfl.gov.uk/west-london-orbital-strategic-outline-business-case.pdf

Respondent reference no.	Name / Organisation	Detailed comments
		LBRUT should consider how it can liaise better with the West London Alliance (WLA) which is a partnership body of Barnet, Brent, Ealing, Hammersmith & Fulham, Harrow, Hillingdon and Hounslow. Like the NHS Partnerships there is a risk that neighbouring areas are not considering our needs fully.
31	Tim Catchpole on behalf of MESS	Delivery on the Brewery site will be constrained by gridlock on Lower Richmond Road.
41	Anthony Swan	Width of road, parking
44	Roger Cutler	Unsafe roads & pavements. The allowing of pavement cycling.
52	Winston W Taylor	I am sure there are plenty but no time to consider properly.
53	Richard Woolf on behalf of McDaniel Woolf Architects	We should consider connective links within open land and not be scared of having an adult conversations about land use.
55	Jon Rowles	The three narrow railway bridges in Whitton (Hospital Bridge Road, Nelson Road, and Hanworth Road) are a barrier to getting people walking and cycling more. They also act to separate communities and make the area too car centric.
59	Paul Massey	Tommy Steel bend
63	Carol Rawlings	Many multi-storey buildings do not have lifts, especially homes above shops.
68 (a)	Mark Jopling	The Council should be bolder in its convictions and decision making behind the Local Plan. Take a stronger line on legal matters to dissuade inappropriate development.
69	Geoff Bond on behalf of Ham and Petersham Association	Richmond Park and the River Thames means Ham and Petersham has one road through it.
Other General comments		
15	Transport for London	<p><i>Please note that these comments represent the views of Transport for London (TfL) officers and are made entirely on a "without prejudice" basis. They should not be taken to represent an indication of any subsequent Mayoral decision in relation to this matter. The comments are made from TfL's role as a transport operator and highway authority in the area. These comments also do not necessarily represent the views of the Greater London Authority (GLA).</i></p> <p>Thank you for giving Transport for London (TfL) the opportunity to comment on Richmond's Local Plan Direction of Travel document. Given the advanced stage of the draft London Plan in the adoption process – with the Intend to Publish version now available on the GLA website – we will have regard to it when assessing and responding to local planning policy consultations, including Richmond's Local Plan Direction of Travel document. We also note that the Mayor has received direction from the Secretary of State and is currently considering his response.</p> <p>[See Appendix for copy of TfL's response on Richmond's draft Transport SPD and a graph of Destinated-based cycle mode shares. Note the response to the Transport SPD was previously published on the Council's website https://cabnet.richmond.gov.uk/ieDecisionDetails.aspx?AllId=38737]</p>
16	Avison Young on behalf of National Grid	<p>National Grid has appointed Avison Young to review and respond to local planning authority Development Plan Document consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.</p> <p>About National Grid</p> <p>National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. The energy is then distributed to the electricity distribution network operators, so it can reach homes and businesses. National Grid Gas plc (NGG) owns and operates the high-pressure gas transmission system across the UK. In the UK, gas leaves the transmission system and enters the UK's four gas distribution networks where pressure is reduced for public use. National Grid Ventures (NGV) is separate from National Grid's core regulated businesses. NGV develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States.</p> <p>Proposed development sites crossed or in close proximity to National Grid assets:</p> <p>Following a review of the above Development Plan Document, we have identified that one or more National Grid assets pass through your Local Authority area. Details of these National Grid assets are provided below.</p>

Respondent reference no.	Name / Organisation	Detailed comments
		<p>Electricity Transmission</p> <p>Asset Description</p> <p>275Kv Underground Cable route: WIMBLEDON - WILLESDEN</p> <p>275Kv Underground Cable route: EALING - LALEHAM 1</p> <p>A plan showing details of National Grid's assets is attached to this letter. Please note that this plan is illustrative only. <i>[See Appendix for plan]</i></p> <p>Please also see attached information outlining further guidance on development close to National Grid assets. <i>[See Appendix for further guidance]</i></p> <p>Further Advice</p> <p>National Grid is happy to provide advice and guidance to the Council concerning their networks. If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us.</p> <p>To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, National Grid wishes to be involved in the preparation, alteration and review of plans and strategies which may affect their assets. Please remember to consult National Grid on any Development Plan Document (DPD) or site-specific proposals that could affect National Grid's assets.</p>
17	Hannah Bridges, Spelthorne Borough Council	<p><i>[Infrastructure]</i></p> <p>Given the scale of development planned in the area additional demand on local infrastructure and transport is expected, therefore Spelthorne would welcome further engagement regarding strategic transport and infrastructure issues, along with Surrey County Council who recently produced transport modelling for Spelthorne's Preferred Options Local Plan.</p>
6	Marine Management Organisation	<p>The Marine Management Organisation (MMO) is a non-departmental public body responsible for the management of England's marine area on behalf of the UK government. The MMO's delivery functions are; marine planning, marine licensing, wildlife licensing and enforcement, marine protected area management, marine emergencies, fisheries management and issuing grants.</p> <p>Marine Licensing</p> <p>Activities taking place below the mean high water mark may require a marine licence in accordance with the Marine and Coastal Access Act (MCAA) 2009. Such activities include the construction, alteration or improvement of any works, dredging, or a deposit or removal of a substance or object below the mean high water springs mark or in any tidal river to the extent of the tidal influence. Local authorities may wish to refer to our marine licensing guide for local planning authorities for more detailed information. You can also apply to the MMO for consent under the Electricity Act 1989 (as amended) for offshore generating stations between 1 and 100 megawatts in England and parts of Wales. The MMO is also the authority responsible for processing and determining harbour orders in England, and for some ports in Wales, and for granting consent under various local Acts and orders regarding harbours. A wildlife licence is also required for activities that would affect a protected marine species.</p> <p>Marine Planning</p> <p>As the marine planning authority for England the MMO is responsible for preparing marine plans for English inshore and offshore waters. At its landward extent, a marine plan will apply up to the mean high water springs mark, which includes the tidal extent of any rivers. As marine plan boundaries extend up to the level of the mean high water spring tides mark, there will be an overlap with terrestrial plans which generally extend to the mean low water springs mark. Marine plans will inform and guide decision makers on development in marine and coastal areas.</p> <p>Planning documents for areas with a coastal influence may wish to make reference to the MMO's licensing requirements and any relevant marine plans to ensure that necessary regulations are adhered to. For marine and coastal areas where a marine plan is not currently in place, we advise local authorities to refer to the Marine Policy Statement for guidance on any planning activity that includes a section of coastline or tidal river. All public authorities taking authorisation or enforcement decisions that affect or might affect the UK marine area must do so in accordance with the Marine and Coastal Access Act and the UK Marine Policy Statement unless relevant considerations indicate otherwise. Local authorities may also wish to refer to our online guidance and the Planning Advisory Service soundness self-assessment checklist. If you wish to contact your local marine planning officer you can find their details on our gov.uk page.</p> <p>See this map on our website to locate the 6 marine plan areas in England. For further information on how to apply the marine plans please visit our Explore Marine Plans service.</p> <p>The East Inshore and Offshore marine plans were adopted on the 2nd April 2014, becoming a statutory consideration for public authorities with decision making functions. The East Inshore and East Offshore Marine Plans cover the coast and seas from Flamborough Head to Felixstowe.</p>

Respondent reference no.	Name / Organisation	Detailed comments
		<p>The South Inshore and Offshore marine plans were adopted on the 17th July 2018, becoming a statutory consideration for public authorities with decision making functions. The South Inshore and South Offshore Marine Plans cover the coast and seas from Folkestone to the River Dart in Devon.</p> <p>The draft North East Inshore and Offshore marine plans were published on the 14th January 2020 becoming a material for consideration for public authorities with decision making functions. The North East Inshore and Offshore marine plans cover the coast and seas from Flamborough Head to the Scottish border. CONSULTATION OPEN UNTIL 6TH APRIL 2020. This is the final stage of statutory public consultation before we submit the marine plan.</p> <p>The draft North West Inshore and Offshore marine plans were published on the 14th January 2020 becoming a material for consideration for public authorities with decision making functions. The North West Inshore and Offshore marine plans cover the coast and seas from the Solway Firth border with Scotland to the River Dee border with Wales. CONSULTATION OPEN UNTIL 6TH APRIL 2020. This is the final stage of statutory public consultation before we submit the marine plan.</p> <p>The draft South East Inshore marine plan was published on the 14th January 2020 becoming a material for consideration for public authorities with decision making functions. The South East Marine plan covers the coast and seas from Felixstowe in Suffolk to near Folkestone in Kent. CONSULTATION OPEN UNTIL 6TH APRIL 2020. This is the final stage of statutory public consultation before we submit the marine plan.</p> <p>The draft South West Inshore and Offshore marine plans were published on the 14th January 2020 becoming a material for consideration for public authorities with decision making functions. The South West Inshore and Offshore marine plans cover the coast and seas from the River Severn border with Wales to the River Dart in Devon. CONSULTATION OPEN UNTIL 6TH APRIL 2020. This is the final stage of statutory public consultation before we submit the marine plan.</p> <p><u>Minerals and waste plans and local aggregate assessments</u></p> <p>If you are consulting on a mineral/waste plan or local aggregate assessment, the MMO recommend reference to marine aggregates is included and reference to be made to the documents below:</p> <ul style="list-style-type: none"> • The Marine Policy Statement (MPS), section 3.5 which highlights the importance of marine aggregates and its supply to England's (and the UK) construction industry. • The National Planning Policy Framework (NPPF) which sets out policies for national (England) construction minerals supply. • The Managed Aggregate Supply System (MASS) which includes specific references to the role of marine aggregates in the wider portfolio of supply. • The National and regional guidelines for aggregates provision in England 2005-2020 predict likely aggregate demand over this period including marine supply. <p>The NPPF informed MASS guidance requires local mineral planning authorities to prepare Local Aggregate Assessments, these assessments must consider the opportunities and constraints of all mineral supplies into their planning regions – including marine. This means that even land-locked counties, may have to consider the role that marine sourced supplies (delivered by rail or river) play – particularly where land based resources are becoming increasingly constrained.</p>
23	Paul Velluet & Peter Willan on behalf of Old Deer Park Working Group	<p>The Group would once again urge the Council to prepare an updated <i>Proposals Map</i> (or <i>Policies Map</i>) to replace that adopted in July, 2015, showing amendments or additions to boundaries and site-specific Allocations adopted since then, including, we hope, adjustments to the boundaries of designated Metropolitan Open Land and Public Open Space in the Old Deer Park, potential adjustments to the boundary of the Historic Registered Park, the boundary of the area covered by the <i>Old Deer Park Supplementary Planning Document</i> and the boundary of the Old Deer Park Conservation Area, to remedy significant and long-established anomalies, as set out very clearly in the Group's submissions to the Council in response to consultation on the preparation of the <i>Richmond-upon-Thames Local Plan</i> of July, 2018 and the <i>Old Deer Park Supplementary Planning Document</i> of February, 2018, and in earlier submissions. Regrettably, the Group's formal submissions proposing and justifying these boundary adjustments were not properly or adequately considered by either the Council or the Inspector. Also attached is a copy of the letter of the 22nd January, 2018 addressed to the Council's Project Manager for the Village Planning Programme responding to the invitation to review and comment on the substantially deficient and defective <i>draft Pools-on-the-Park, Richmond Statement of Significance</i> – relating to Site-specific proposal SA 22 in the <i>Local Plan</i> - to which specific reference is made in the <i>Old Deer Park Supplementary Planning Document</i> and which remains unchanged on the Council's planning policy web-site, despite repeated requests to revise the document.</p> <p>Copies of the following items are appended to this statement:</p> <ul style="list-style-type: none"> • The London Borough of Richmond-upon-Thames Local Plan, A Statement by the Old Deer Park Working Group for presentation at the relevant hearing session of the Inspector's examination, based on the Group's earlier submissions to the Council, September, 2017; • <i>The Old Deer Park Draft Supplementary Planning Document, December, 2017, A response by the Old Deer Park Working Group, January, 2018;</i> and

Respondent reference no.	Name / Organisation	Detailed comments
		<ul style="list-style-type: none"> Letter to Ms Nicky Linihan (the Council's Project Manager for the Village Planning Programme) of the 22nd January, 2018 responding to the <i>Draft Pools-on-the Park, Richmond, Statement of Significance</i>. <p>[See Appendix for Group's earlier submissions]</p>
(23)	Peter Willan & Vivien Harris on behalf of Friends of Richmond Green	<p>Please note the Friends of Richmond Green have indicated that they wish to support the comments made by Prospect for Richmond, Respondent No. 23. FoRG are a long established amenity group covering around 350 households around and in the vicinity of Richmond Green and Little Green (the Green). We aim to preserve the special qualities, character and setting of the historic Richmond Green. The Green is a wonderful setting with many historic views and vistas and is a major attraction for people visiting the town, its shops and offices and is much appreciated by the many residents in the vicinity of the Green as well as residents in the town's wider reaches.</p> <p>The Richmond Town response includes the Green, which FoRG is particularly interested, but we also support the concept of Richmond comprising Central Richmond, the Green and the Riverside Conservation Areas as addressed in the Richmond Town response.</p>
32	Mark Jopling on behalf of UPPFT	<p>We encourage the Council to be bold with the Local Plan, and then defend it rigorously. One of the lessons from UPPF was that a tougher stance by the Council 5 years ago could have avoided a costly and long Planning saga. The Trust would like to thank the Council for their ongoing support of upholding the current Local Plan protection bestowed on Udney Park. The Trust are dismayed that the speculative punt by Quantum has absorbed so much public and volunteer resource to defend the Local Plan and so urge the Council to use this Local Plan revision to prevent such schemes ever getting funding.</p> <p>To resolve the future of UPPF as a long term sustainable self-funded community facility the Trust urge the Council to use the Compulsory Purchase Order and Community Asset Transfer process to ensure that the current owners cannot carry out their threats to close the playing fields to try and force a submission from the community and the LPA. Such a move would send a clear signal to speculators, invest where the Richmond Local Plan directs or lose.</p>

Table of organisations registering acknowledgement of engagement and making no comment

Respondent number	Respondent name and/or organisation	Response
8	Sharon Jenkins, Natural England	Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development. Natural England have no comments to make on this consultation.
11	Surrey County Council	Thank you for consulting Surrey County Council's the Minerals and Waste Planning Policy team and Spatial Planning team on the Local Plan Direction of Travel consultation and Call for sites. We do not have any specific comments to make on this consultation, but please keep us informed of any future consultations.

Appendices:

15. Transport for London
16. Avison Young on behalf of National Grid
23. Peter Willan & Paul Velluet on behalf of Old Deer Park Working Group
24. Paul Velluet
30. Jon Rowles on behalf of OBO Friends of Heathfield Recreation Ground and Environs

Appendices to all responses received to the New Local Plan Direction of Travel consultation
https://www.richmond.gov.uk/new_local_plan_direction_of_travel_engagement

Consultation from Monday 24 February to Sunday 5 April 2020
Published by LBRuT on 30 November 2020

Respondent reference no.	Name / Organisation
15	Transport for London (TfL)
16	Avison Young on behalf of National Grid
23	Peter Willan & Paul Velluet on behalf of Old Deer Park Working Group
24	Paul Velluet
30	Jon Rowles on behalf of Friends of Heathfield Recreation Ground and Environs



Appendix A: Specific suggested edits and comments from TfL on Richmond’s draft Transport Supplementary Planning document

Section	Page	Track change/comment
Introduction	4	<p>We greatly support Richmond’s recognition of the climate emergency and the importance of transport infrastructure and active travel facilities/networks to support travel around existing and new communities.</p> <p>We therefore request that the anticipated date for the publication of the draft London Plan in March 2020 is removed/updated as appropriate, as this is unlikely to be met.</p>
Introduction - Our Place in London –	6	<p>We believe that the borough’s main challenges include high levels of car ownership, congestion and the promotion of sustainable travel in less accessible parts of the borough. We also appreciate that the Council recognises that cross borough boundary issues, such as congestion and improving sustainable travel networks will need to be addressed by working with neighbouring boroughs and TfL.</p> <p>Richmond’s new draft Local Plan should focus on how sustainable travel can be prioritised above private car travel, especially in areas where new developments are planned. Focusing car-free and car-lite development in well-connected parts of the borough supported by existing/planned sustainable transport infrastructure will ensure the best use of land within the borough and help reduce reliance on private vehicles. Policies that support the delivery of sufficient levels of high quality cycle parking should also be adopted in order to enable more people to cycle.</p> <p>We also believe that it is vital that Richmond continue to protect Green Belt and MOL from development. These areas also will not have the appropriate services and transport infrastructure to support new developments in line with Good Growth.</p>
Responding to the climate emergency	14	<p>We strongly support Richmond’s declaration of a climate emergency in July 2019 and adoption of their Climate Emergency Strategy in 2020, which will help the Council overcome environmental challenges faced by the borough. We also welcome the Council’s commitment to become carbon neutral by 2030, which will help minimise the borough’s contribution to climate change. Influencing</p>

Section	Page	Track change/comment
		transport behaviour will be key to achieving this and the Council should develop strategies to enable residents to be less car dependent and travel more on foot, cycle and public transport.
Shaping and supporting our town centre and local centres	26	<p>We strongly support Richmond’s policy to focus development in line with the town centre first principle, which is in line with the policies set out in the Intend to Publish version of the London Plan. We also would encourage the Council to build residential and mixed use developments in well-connected town, local and community centres. The Council should ensure that travel to/from and within their town centres by foot, cycle and public transport is as safe, convenient and attractive as possible. We would also encourage reducing the provision of car parking in town centres and would recommend that the Council look at opportunities to convert on-street parking bays to provide additional cycle parking.</p> <p>The approach to redevelop existing out-of-centre developments/retail parks should make sure that these are accessible by sustainable modes of transport so that they are not car dependent. Car and cycle parking provision should also be in line with the policy standards in the Intend to Publish London Plan and make sure that they are designed and located in a way which prioritises active travel choices.</p> <p>The borough has been identified in the draft London Plan as an area where higher cycle provision is required, both to cater for future growth and to reflect that around 7.5 per cent of trips arriving at workplace, leisure and shopping destinations are made by cycle, more than twice the average for inner London (see Appendix B). To support town centre and out of centre retail developments we would welcome clearer support for ensuring cycle parking quality, such as in relation to location, spacing and access.</p>
Green Infrastructure and protecting open land	40	We would urge the Council to resist developing areas of the Green Belt and Metropolitan Open Land (MOL). In transport terms, these areas are generally more likely to have lower levels of connectivity by public transport i.e. PTAL 0-1 and lower levels of local amenities compared to developed areas that could potentially be intensified.
Improving design	45	We welcome the design-led approach to help provide high quality places and improved design and

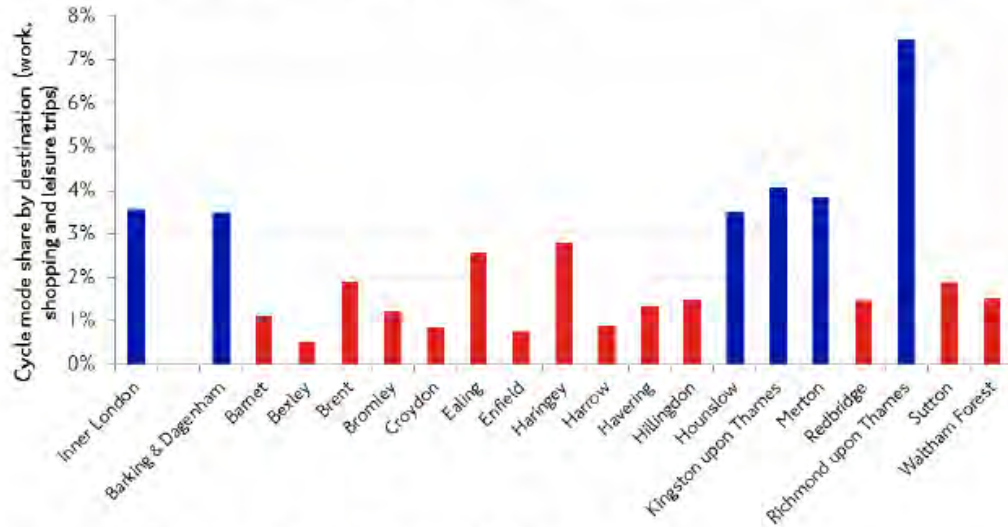
Section	Page	Track change/comment
		support the reference made to the ten characteristics of well-designed places as set out in National Design Guidance. We would welcome a public realm policy in the Richmond's local plan that supports the Healthy Streets Approach and the delivery of high quality public realm that enables inclusive active, inclusive travel.
Promoting sustainable transport	48	<p>We welcome the Council's commitment to addressing the climate emergency and the importance of improving transport and achieving the Mayor's modal shift target in achieving this. We are extremely supportive of the Council prioritising sustainable travel and its recognition of the importance of enhancing the bus, walk and cycling networks in particular as part of this.</p> <p>While we also acknowledge that there will likely be some trips that will continue to be made by car, it is important to view new development as a particular opportunity to embed the best possible approach to maximising sustainable travel. This in turn reduces the extent to which mode shift among residents/users of existing development is needed to meet Richmond's target, which could involve fewer opportunities than having ambitious planning policies in place. Embedding car-free and car-lite lifestyles in development schemes from the outset, as the Council suggests, is an excellent way of achieving this.</p> <p>We welcome the reference made to Crossrail 2, given the transformational effect the scheme could have on the borough. We note the Council's concern regarding ensuring connecting journeys to Crossrail 2 stations are made by public transport, walking and cycling. We strongly support this aim and are open to further discussion on the matter to understand and look to address these concerns.</p>
Buses	49	We welcome the recognition of the importance of bus networks within the borough. We will continue to work with the Council to understand how the existing routes, frequencies and access to bus stops/stations can be improved. To support this, we would welcome clear policies for protecting land/space for bus infrastructure, the expansion of bus priority and developer contributions towards enhanced services.
Hierarchy of street users/active	50	We welcome the intention of the hierarchy of street users. However, we would urge the Council to

Section	Page	Track change/comment
travel		<p>consider some additional nuance around the role of cycling and buses. The two modes need to be considered together to maximise sustainable mode share overall and the benefits each mode offers. In some areas buses play a key role in providing transport connectivity and this needs to be considered alongside expanding access to cycling. In particular, buses play a key role in making London accessible, both in terms of cost of travel and for people who are less able to walk long distances or use stairs and/or escalators at stations.</p> <p>We welcome the Council’s recognition of both the current high levels of active travel in the borough and the potential to grow these further.</p>
Car parking, town centre parking provision, cycle parking, cycling infrastructure and	52	<p>We commend the Council for considering how to deliver less car-dependent development including through lower parking standards. We strongly encourage the Council to requiring car-free and car-lite development as far as possible, so as to best support the vision for sustainable transport it has set out. This will also help minimise new development’s contributions to the climate emergency, make it easier to tackle the housing crisis and reduce congestion on the road network and the borough grows. We welcome that the Council are considering adopting the draft London Plan residential standards across the whole borough, and encourage this option to be pursued. We would also welcome discussion on whether we can better support the Council to achieve lower parking provision in new development, including in less well-connected areas.</p> <p>If parking standards above those set out in the draft London Plan are adopted, particularly in well-connected areas and in borough centres, the Council will risk undermining their ambitions for ensuring ‘walking, cycling and public transport are the natural choice for trips to and from new developments’ and becoming carbon neutral by 2030. In light of the borough’s emphasis on the climate emergency, there is a considerable benefit to reducing emissions more quickly, such as through ambitious parking and mode shift policies, than relying on longer term emission reductions alone (e.g. full electrification of the vehicle fleet). It is therefore essential that car parking in new developments is kept to a minimum and is at least in line with the standards set out the draft London Plan.</p>

Section	Page	Track change/comment
		<p>To support this approach, the Council could look into the expansion of Controlled Parking Zones (CPZs) as necessary. CPZ implementation can be funded by developers when secured as mitigation for their development and we would be happy to offer support such as by sharing best practice from other boroughs and elsewhere to help their implementation. While this may bring about change for some existing residents, this is a better solution than accepting lower housing delivery or higher congestion resulting from more off-street parking. The issue of parking permits can be capped or restricted to residents of new development – as practiced by other local authorities – to prevent additional parking stress on surrounding streets.</p> <p>We welcome that the Council is looking at the potential to reduce the number of parking spaces available in the borough’s centres, and encourage it to pursue this option. By doing so, the Council will better discourage car use where there are good alternatives and encourage walking, cycling and bus access to town centres, where there is considerable potential for mode shift.</p> <p>We strongly support Richmond’s adoption of cycle parking standards and welcome the Council’s plans to investigate adopting cycle parking standards higher than those in the London Plan to reflect local circumstances. We would also welcome specific policies in the borough’s new local Plan to provide policies to support the delivery of cycle parking quality, such as location, spacing and access, as detailed in Richmond’s draft Transport SPD.</p> <p>We strongly support the Council’s approach to securing developer contributions to the cycle networks within Richmond as set out in the recent draft Transport SPD. The Council’s Active Travel Strategy highlights areas that are less permeable by cycle, and this is something that developer contributions could also look to improve alongside strategic and local routes.</p>
Securing social and community infrastructure	53	We welcome references made to delivering the Healthy Streets Approach to support community cohesion and a growing population. We, especially welcome these references in the context of improving the public realm.

Appendix B: Destination-based cycle mode shares¹

Figure 4: Cycle mode share by destination for commute, shopping and leisure trips only, outer London boroughs compared to inner London



Source: London Travel Demand Survey, 2012/13 to 2014/15

¹ https://www.london.gov.uk/sites/default/files/london_plan_evidence_base_-_cycle_parking.pdf

Respondent 16. Avison Young on behalf of National Grid

National Grid
24 March 2020
Page 3

Guidance on development near National Grid assets

National Grid is able to provide advice and guidance to the Council concerning their networks and encourages high quality and well-planned development in the vicinity of its assets.

Electricity assets

Developers of sites crossed or in close proximity to National Grid assets should be aware that it is National Grid policy to retain existing overhead lines in-situ, though it recognises that there may be exceptional circumstances that would justify the request where, for example, the proposal is of regional or national importance.

National Grid's 'Guidelines for Development near pylons and high voltage overhead power lines' promote the successful development of sites crossed by existing overhead lines and the creation of well-designed places. The guidelines demonstrate that a creative design approach can minimise the impact of overhead lines whilst promoting a quality environment. The guidelines can be downloaded here: <https://www.nationalgridet.com/document/130626/download>

The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site.

National Grid's statutory safety clearances are detailed in their 'Guidelines when working near National Grid Electricity Transmission assets', which can be downloaded here: www.nationalgridet.com/network-and-assets/working-near-our-assets

Gas assets

High-Pressure Gas Pipelines form an essential part of the national gas transmission system and National Grid's approach is always to seek to leave their existing transmission pipelines in situ. Contact should be made with the Health and Safety Executive (HSE) in respect of sites affected by High-Pressure Gas Pipelines.

National Grid have land rights for each asset which prevents the erection of permanent/ temporary buildings, or structures, changes to existing ground levels, storage of materials etc. Additionally, written permission will be required before any works commence within the National Grid's 12.2m building proximity distance, and a deed of consent is required for any crossing of the easement.

National Grid's 'Guidelines when working near National Grid Gas assets' can be downloaded here: www.nationalgridgas.com/land-and-assets/working-near-our-assets

How to contact National Grid

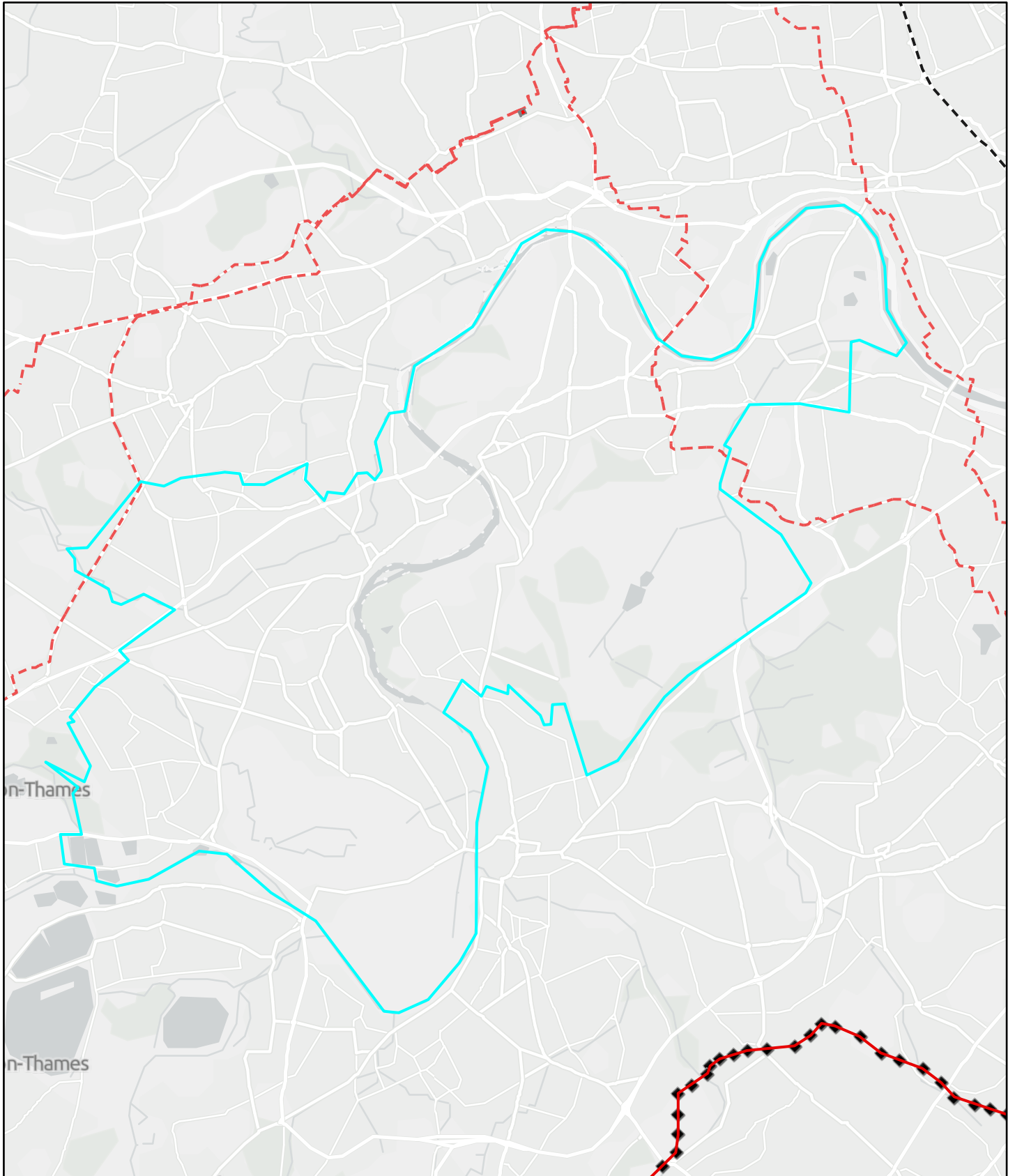
If you require any further information in relation to the above and/or if you would like to check if National Grid's transmission networks may be affected by a proposed development, please contact:

- National Grid's Plant Protection team: plantprotection@nationalgrid.com

Cadent Plant Protection Team
Block 1
Brick Kiln Street
Hinckley
LE10 0NA
0800 688 588

or visit the website: <https://www.beforeyoudig.cadentgas.com/login.aspx>

LBROT - Direction of Travel Consultation - March 2020



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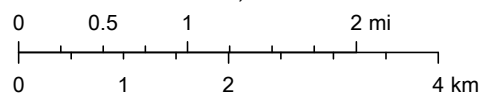
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LONDON BOROUGH OF RICHMOND-UPON-THAMES LOCAL PLAN

A STATEMENT BY THE OLD DEER PARK WORKING GROUP FOR PRESENTATION AT THE RELEVANT HEARING SESSION OF THE INSPECTOR'S EXAMINATION, BASED ON THE GROUP'S EARLIER SUBMISSIONS TO THE COUNCIL, SEPTEMBER, 2017

1. INTRODUCTION

- 1.1 The Old Deer Park Working Group comprises representatives of The Richmond Society, The Kew Society, The Friends of Richmond Green, The Friends of Old Deer Park and The St Margaret's Estate Residents Association. Details of each of the groups are attached in Appendix A.
- 1.2 This statement conveys the concerns of the Working Group regarding the soundness of a number of specific aspects of the Council's final version *Richmond-upon-Thames Local Plan* relating to the Old Deer Park, Richmond. The statement focuses on those aspects of the Council's *Plan* which the Group considers are insufficiently robust in providing the Council, as local planning authority and the local community with effective control over development affecting the particular architectural, historic and landscape significance of the Old Deer Park as a designated heritage asset in the terms commended in the relevant parts of the *National Planning Policy Framework*.
- 1.3 In Section 3 of this Statement, the Working Group has set out its concerns about the soundness of specific aspects of the *Plan* relating to the particular definition of boundaries in the *Proposals Map* insofar as they relate to the Old Deer Park; to the wording of some of the policies of the *Plan* insofar as they relate to the Park; and to the wording of two of the site- specific proposals which relate directly to the Park. In each case, the Group has explained the reasons for its concerns, and put forward its suggestions as to the potential means of addressing the weaknesses of the *Plan* as presently submitted and securing modest amendments which will contribute to providing a sounder statement of Policy insofar as is necessary to ensure that the significance of the Old Deer Park as a designated heritage asset will be assured.

2. THE BACKGROUND TO THE WORKING GROUP'S STATEMENT

- 2.1 In July, 2012, the Group prepared and published a report - *The Old Deer Park, Richmond – Re-connecting the Town to its local park – Realising an under-recognised parkland asset – A framework for future conservation and enhancement*. A copy of the report is attached as Appendix B. The report was intended to provide a positive contribution to discussion and debate in anticipation of the falling-in (in April,

2016) and potential renewal of all but two of the existing leases granted by the Crown Estate for the land comprising the Old Deer Park, Richmond.

- 2.2 Over many years, many living and working in Richmond, Kew and St Margaret's had expressed substantial interest in the effective conservation and enhancement of the Park and have attached considerable value to its amenity, and its particular character and historic, landscape and ecological interest and significance. Accordingly, the Working Group believed that it was timely to set out the corporate views of its constituent bodies on the opportunities that would arise and its keen hope that the Crown Estate would progress the future management of its Old Deer Park estate with a view to assuring its effective conservation and enhancement in addition to its continued use for outdoor sports and recreational activity by the local community.
- 2.3 Importantly, the Working Group was concerned that any development that might be advanced within the area should not only be sustainable in the fullest sense but also consistent with the designation of the Park as a conservation area and its inclusion on English Heritage's *Register of Parks and Gardens of Special Historic Interest* and in the buffer-zone of the *Royal Botanic Gardens Kew World Heritage Site*. In addition, the Group believed that high priority should be given to improving and enhancing physical links between the Town and the Park and suggested a number of measures that might be delivered relatively easily and inexpensively.
- 2.4 Importantly, too, the Working Group also raised concerns regarding significant anomalies regarding the definitions of a number of boundaries relating to the Old Deer Park shown in the Council's *Local Development Framework Proposals Map, Adopted November, 2011*.
- 2.5 Such concerns were set out in detail and justified in the Working Group's report *The Old Deer Park, Richmond - Re-connecting the Town to its local park - Realising an under-recognised parkland asset - A framework for future conservation and enhancement – A submission urging review of boundary definitions* in February, 2013.
- 2.6 In November, 2013, the Working Group set out its formal response to consultation by the Council on its pre-publication version of the *Richmond-upon-Thames Local Plan, Site allocations plan*, published in October, 2013. The substantive part of the concerns of the Working Group about each of the three sites related directly but not exclusively to the significant anomalies in the definitions of boundaries relating to the Old Deer Park shown in the Council's *Local Development Framework Proposals Map, Adopted November, 2011*, as had already been highlighted in the Group's submission of February, 2013.
- 2.7 In July, 2014, the Working Group set out its formal response to consultation by the Council on the pre-publication version of *The Richmond-upon-Thames Local Plan, Site Allocations Plan – New Additional Sites, June, 2013*. Once again, the Working Group

stressed its concerns about the significant anomalies in the definitions of boundaries relating to the Old Deer Park shown in the Council's *Local Development Framework Proposals Map, Adopted November, 2011*.

- 2.8 In August, 2016, the Working Group set out its formal response to consultation by the Council on the first draft, pre-publication version of *The Richmond-upon-Thames Local Plan*, published in July, 2016. In this response, the Working Group stressed its continuing concerns about the significant anomalies in the definitions of boundaries relating to the Old Deer Park shown in the Council's *Local Plan Proposals Map – unchanged* from those shown in the *Local Development Framework Proposals Map, Adopted November, 2011*.
- 2.9 Finally, in February, 2017, the Working Group set out its formal response to consultation by the Council on its final, publication version of the *Richmond-upon-Thames Local Plan*, published in January, 2017. Once again, the Working Group stressed its continuing concerns about the significant anomalies in the definitions of boundaries relating to the Old Deer Park shown in the Council's *Local Plan Proposals Map, Adopted July, 2015 – still unchanged* from those shown in the *Local Development Framework Proposals Map, Adopted November, 2011*.
- 2.10 In this submission, the Working Group observed that a note had been added to the present document advising that 'The existing Proposals Map (2015) and its designations will be retained unless indicated otherwise within this document. In addition, the site-specific allocations as set out within this Plan will also be incorporated into the Council's final version of the Proposals Map'. Regrettably no such advice was provided in relation to the earlier *First Draft of the Local Plan – thus the earlier concern expressed by the Group regarding the absence of a draft, amended Proposals Map*.
- 2.11 The Working Group went on to observe that given the fundamental significance of the *Proposals Map* in securing a sound understanding and appreciation of the policies and site-specific proposals set out in the Final Version of the *Local Plan* and their potential application, the Group remained of the view that the draft, amended *Proposals Map* should be subject to the same consultation and scrutiny as the *Local Plan* and that such a process should be carried out as an integral part of the consultation and scrutiny of the *Local Plan*.
- 2.12 Subsequently, the Group has noted with disappointment that the Council's 32-page document - *Proposals map changes, Local Plan, Publication version for consultation, 4th January – 15th February, 2017* – provided for no amendment to any of the boundaries relating to the Old Deer Park, noting that it specifically excluded the site-specific allocations set out in the main publication version Local Plan at Section 12, and stated unequivocally at paragraph 1.4: 'The Proposals map (2015) will be retained unless indicated otherwise. As such all other designations remain unchanged'.

- 2.13 In addition and importantly, over the last two years the Working Group has been actively engaged with Council officers in discussions and written exchanges in connection with the emerging *Supplementary Planning Document* for the Old Deer Park (otherwise referred to at earlier stages by the Council as a 'Village Plan' and as a 'Planning Brief'). Such engagement has included the submission in November, 2016 of a formal response to the Council's consultation on the development of a *Supplementary Planning Document for the Old Deer Park*, published in October, 2016. A copy of the Working Group's submission is attached as Appendix C.
- 2.14 In this submission, the Working Group drew attention to a number of specific errors in the definition of some of the boundaries shown in the draft document and once again expressed concern regarding the significant anomalies in the definitions of the boundaries extrapolated from the Council's *Local Plan Proposals Map, Adopted July, 2015*; stressing that such anomalies in the relevant boundary definitions should not be perpetuated in the *Old Deer Park SPD* before the Council's *Local Plan Proposals Map* had been properly addressed and resolved in the light of the Working Group's consistent representations and formal examination of the overall *Richmond-upon-Thames Local Plan*. In recent months, the Working Group has been reassured by the Council's planning consultants that the specific errors will be corrected and a number of other matters resolved. However, the Group is concerned that one of the two maps proposed for inclusion in the final version of the *SPD* – that showing land-use designations – may perpetuate the anomalies in the boundaries to which the Working Group has repeatedly referred to.

3. THE KEY ISSUES

THE PROPOSALS MAP (Council references 29 and 113)

- 3.1 The Working Group observes that a note was added to the published version of the Local Plan document advising that 'The existing Proposals Map (2015) and its designations will be retained unless indicated otherwise within this document. In addition, the site-specific allocations as set out within this Plan will also be incorporated into the Council's final version of the Proposals Map'. Regrettably no such advice was provided in relation to the earlier *First Draft of the Local Plan* – thus leading to the earlier concern expressed by the Group regarding the absence of a draft, amended *Proposals Map*.
- 3.2 Given the fundamental significance of a *Proposals Map* in securing a sound understanding and appreciation of the policies and site-specific proposals set out in the final version of the *Local Plan* and their potential application, the Group urges the Inspector to address the boundary-related issues affecting the Old Deer Park to which the Working Group has repeatedly referred in its submissions to the Council as an

integral part of his formal examination the Council's *Local Plan* and to recommend the appropriate amendments to the relevant boundaries shown in the *Proposals Map*.

THE BOUNDARIES OF METROPOLITAN OPEN LAND, PUBLIC OPEN SPACE AND THE RICHMOND TOWN CENTRE (Council reference 481)

- 3.3 The Working Group notes with considerable regret the continuing resistance of the Council to address and resolve the significant and longstanding anomalies in the boundaries of Metropolitan Open Land, Public Open Space and the Richmond Town Centre insofar as they relate to the Old Deer Park as shown on the current and earlier *Proposals Maps*. The Group does not accept the reasons stated by the Council for repeatedly rejecting the need to address and resolve these significant anomalies and believes that the present definition of the boundaries remains entirely unsound, as stated and justified consistently by the Working Group since 2012.

METROPOLITAN OPEN LAND

- 3.4 The greater part of the Park, including the Richmond Athletic Association Ground, the Old Deer Park Car-park and the former and now derelict Public Conveniences and British Legion buildings immediately adjacent, has long been rightly designated as Metropolitan Open Land. However, entirely anomalously, the MOL designation excludes the listed, Council-owned *Pools-on-the-Park* complex, its landscaped grounds and the adjacent car-park, together with the carriageway and footways of the Twickenham Road, despite the inclusion of all these areas within the grade I *Royal Botanic Gardens Kew Registered Park* and the buffer-zone of the *Royal Botanic Gardens Kew World Heritage Site*, and despite repeated representations by groups in the local community over the last thirty or more years. Anomalously too, the present *MOL* designation also excludes the land to the immediate south of the Old Deer Park Car-park on which the single-storey, utility buildings occupied by voluntary groups presently stand.
- 3.5 The Working Group urges the Inspector to recommend that the boundaries of the Metropolitan Open Land within the Park should be amended to include these areas given that they are wholly consistent in their function and open character to the adjacent parkland areas which are properly designated as MOL, and that they are consistent with the definitions of Metropolitan Open Land given in the *London Plan, 2016* and in the *Richmond-upon-Thames Local Plan* itself. Importantly, none of the roads in the Borough's other major historic parks – Richmond and Bushy Parks are similarly excluded from designation as MOL.

PUBLIC OPEN SPACE

- 3.6 The greater part of that park leased by the Council from the Crown Estate has long been rightly designated as Public Open Space. However, entirely anomalously, the POS designation excludes the extensive landscaped grounds which form the immediate

setting of listed, Council-owned *Pools-on-the-Park* complex and the adjacent car-park, which enjoys unrestricted public access, despite their inclusion within the grade I *Royal Botanic Gardens Kew Registered Park* and the buffer-zone of the *Royal Botanic Gardens Kew World Heritage Site*, and despite repeated representations by groups in the local community over the last thirty or more years.

- 3.7 The Council-owned Old Deer Car-park is located in that part of the Old Deer Park closest to The Green and at the principal entry-points to the Park for pedestrians from the northern corner of The Green and the western end of Park Lane. It presents an open and partly landscaped character and appearance, enjoys unrestricted public access and is in public ownership (through the Council as a lessee of The Crown Estate). It is located entirely within the formally designated *Old Deer Park Conservation Area* and the grade I *Royal Botanic Gardens Kew Registered Park*. Despite these major factors, wholly anomalously, the entire car-park site is presently excluded from designation as Public Open Space. Importantly, none of the car-parks in the Borough's other major historic parks – Richmond and Bushy Parks are similarly excluded from designation as Public Open Space.
- 3.8 The Working Group urges the Inspector to recommend that the boundary of Public Open Space within the Park should be amended to include the extensive landscaped grounds which form the immediate setting of the listed, Council-owned *Pools-on-the-Park* complex and the adjacent car-park and the Old Deer Park Car-park given their open and landscaped character, their accessibility to the public, and their consistency with the definitions of *Public Open Space* given in the in the *Richmond-upon-Thames Local Plan* itself.

RICHMOND TOWN CENTRE

- 3.9 The Working Group notes that wholly anomalously, the entire area of the Old Deer Park Car-park, the land to the immediate south of the Old Deer Park Car-park extending down towards the railway (on which the single-storey buildings occupied by voluntary groups stand); and the Royal Mail Depot and former TA Centre are identified as forming part of the designated *Richmond Town Centre* despite their falling within the surviving historic boundary of the Old Deer Park, despite their inclusion within the grade I *Royal Botanic Gardens Kew Registered Park*, despite their location on the north side of the deep railway-cutting that separates the Park from The Green and the historic heart of the Town, despite the designation of the Car-park as Metropolitan Open Land, and despite repeated representations in past years by groups in the local community questioning the designation of this part of the Park within an *Area of mixed use*. The present, anomalous designation clearly prejudices its protection from inappropriate urban development, as reflected in proposals submitted in recent years for the development of a below-ground supermarket located below a 'green blanket'.

- 3.10 The Working Group urges the Inspector to recommend that the Old Deer Park Car-park, the land to the immediate south of the Old Deer Park Car-park extending down towards the railway (on which the single-storey buildings occupied by voluntary groups stand); and the Royal Depot and former TA Centre, should be removed from the boundary of the Richmond Town Centre.

THE BOUNDARIES OF METROPOLITAN OPEN LAND, PUBLIC OPEN SPACE AND THE RICHMOND TOWN CENTRE - SUMMARY

- 3.11 In summary, the Group urges the Inspector to recommend that the relevant boundaries should be amended as follows:

- To include the listed *Pools-on-the-Park* swimming pools complex and its landscaped grounds and adjacent car-park; the land to the immediate south of the Old Deer Park car-park extending down towards the railway (on which the single-storey utility buildings occupied by voluntary groups presently stand); and the carriageway and footways of the Twickenham Road, as Metropolitan Open Land.
- To include the listed *Pools on the Park* swimming pools complex and its landscaped grounds and adjacent car-park; the entirety of the Old Deer Park Car-park; the land to the immediate south of the Old Deer Park Car-park extending down towards the railway (on which the single-storey buildings occupied by voluntary groups stand); as Public Open Space.
- To remove the Old Deer Park Car-park; the land to the immediate south of the Old Deer Park Car-park extending down towards the railway (on which the single-storey buildings occupied by voluntary groups stand); and the Royal Mail Depot and former TA Centre from designation as part of the Town Centre.

The existing boundaries of all these areas are shown on the Council's *Local Plan Proposals Map, Adopted July, 2015*, and in outline of the Working Group's *The Old Deer Park, Richmond – Re-connecting the Town to its local park – Realising an under-recognised parkland asset – A framework for future conservation and enhancement*. A copy of the report is attached as Appendix B.

THE ABSENCE OF REFERENCES TO *THE OLD DEER PARK, RICHMOND: THE CROWN ESTATE LANDSCAPE STRATEGY* (Council references 113, 118, 448 and 451)

- 3.12 The Group views with considerable regret the continuing resistance of the Council to include references to *The Old Deer Park, Richmond: The Crown Estate Landscape Strategy* under Policy LP 5 – Views and vistas, Policy LP 6 – Royal Botanic Gardens, Kew World Heritage Site, Site specific proposal SA 22 – Pools on the Park and surroundings, Old Deer Park, Richmond, and Site specific proposal SA 23 – Richmond Athletic Association Ground. Old Deer Park, Richmond.

- 3.13 The Group does not accept the reasons stated by the Council for the continuing omission of references to this most important and still highly relevant conservation and planning document – not least, given the references to the similar *Royal Botanic Gardens Kew World Heritage Site Management Plan* and the *Royal Botanic Gardens Kew Landscape Management Plan*. Whilst the Group notes that the *Crown Estate Landscape Strategy* contains limited references to planning policies that have now been superseded in the very brief Section 10, the substantial part of the document remains highly relevant, it sees no reason why references cannot be made to the document, with a brief note regarding the policies cited in Section 10. The Group urges the Inspector to address this significant omission and recommend the inclusion of references to *The Old Deer Park, Richmond: The Crown Estate Landscape Strategy*.

THE WORDING OF POLICIES LP 6 AND LP 14 (Council references 118 and 168)

- 3.14 The Working Group notes with considerable regret the continuing resistance of the Council to amend the wording of new Policy LP 6 – Royal Botanic Gardens Kew World Heritage Site to recover reference to ‘working with others’ and to include reference to *The Old Deer Park, Richmond: The Crown Estate Landscape Strategy*. The Group urges the Inspector to address these omissions and recommend their resolution, given the clear need for effective participation by the Crown Estate, leaseholders, national and other agencies and local community groups in the care, conservation and management of the World Heritage Site and its buffer-zone in order to secure the policy objective.
- 3.15 The Group notes with considerable regret the continuing resistance of the Council to amend – in the interests of clarity and certainty - the wording of new Policy LP 14 – Other Open Land of Townscape Importance to amend the heading of the policy and the relevant parts of the policy to refer to ‘Other open land of townscape and landscape importance’. Such a modest adjustment would extend appropriate protection to open land within the Park (and in other parts of the Borough) which falls outside Metropolitan Open Land designation but nevertheless possesses particular landscape interest and significance (as distinct from ‘townscape interest’. The Group urges the Inspector to address this issue and recommend that the heading and wording of the policy should be amended accordingly.

THE WORDING OF SITE-SPECIFIC PROPOSALS SA 22 AND SA 23 (Council references 448 AND 451)

- 3.16 Whilst noting that detailed guidance on the potential development of the respective sites will be provided in the proposed *Old Deer Park Supplementary Planning Document*, the Working Group notes with considerable regret the continuing resistance of the Council to amend the wording under both Site-specific Proposals SA 22 – Pools on the Park and surroundings, Old Deer Park, Richmond and SA 23 –

Richmond Athletic Association Ground, Old Deer Park, Richmond - as urged by the Group in its formal submission of August, 2016.

SITE SPECIFIC PROPOSAL SA 22

- 3.17 In relation to Site-specific Proposal SA 22 relating to the Pools-on-the Park complex, the Group remains concerned by the absence of wording to the effect that any proposed improvements or upgrading of the existing facilities and any additional leisure facilities, community and other complementary uses should ensure the preservation of the special interest of the existing listed complex and its setting, and sustain their significance; preserve or enhance the character or appearance of the conservation area and the World Heritage Site buffer-zone, and sustain their significance; and respect the parkland character of the adjacent Metropolitan Open Land, avoiding encroachment into the area beyond the boundary of the site and the existing public sports changing-rooms and club-room building and the largely redundant and derelict Council maintenance-depot for the Park. The Group also remains concerned by the absence of wording to the effect that any proposed development should have full regard to the relevant policies set out in the Crown Estate's *The Old Deer Park Richmond – Landscaping Strategy*.
- 3.18 In the interests of clarity and certainty, the Group urges the Inspector to recommend appropriate amendment of the wording of the proposal.

SITE SPECIFIC PROPOSAL SA 23

- 3.19 In relation to Site-specific Proposal SA 23 relating to the Richmond Athletic Association ground, the Group remains concerned by the absence of wording to the effect that any proposed improvements or upgrading of the existing facilities and any additional leisure facilities and other complementary uses should ensure the preservation of the special interest of the existing listed pavilion/grandstand and its setting, and sustain their significance; preserve or enhance the character or appearance of the conservation area and the World Heritage Site buffer-zone, and sustain their significance; and respect the parkland character of the Metropolitan Open Land, avoiding encroachment into the area beyond the boundary of the site.
- 3.20 In the light of significant unauthorised development, both today and in the past, the Working Group also remains concerned by the absence of wording to the effect that only car-parking directly relating to the primary use of the site for recreation use shall be permitted and should be extensively landscaped to reflect the significant location of the site within the Park, and that the potentially adverse effects of any floodlighting of pitches should be mitigated in order to protect the significance of the site as an integral part of the Old deer Park and the amenity of nearby local residents. The Group is further concerned by the absence of wording to the effect that any proposed development should have full regard to the relevant policies set out in the

Crown Estate's *The Old Deer Park Richmond – Landscaping Strategy*. In the interests of clarity and certainty, the Group urges the Inspector to recommend appropriate amendment of the wording of the proposal.

4. ADDITIONAL NOTE

- 4.1 The Working Group remains entirely willing to provide copies to the Inspector of any of its submissions to the Council and to clarify any of the issues it has raised in this submission. In addition, the Group would wish to encourage the Inspector to undertake a site inspection of key parts of the Old Deer Park in order to appreciate its considerable architectural, historic and landscape interest and significance, and to recognise the need to ensure that sound policies are in place to ensure that such interest and significance will be effectively sustained in accordance with the relevant policies of the *National Planning Policy Framework*.



Paul Velluet

4th September, 2017.

APPENDIX A - THE CONSTITUENT MEMBERS OF THE WORKING GROUP

THE RICHMOND SOCIETY

The Richmond Society was founded in 1957 and has a long established reputation for positive engagement in local conservation, development and planning issues. The Society has charitable status and has approaching one thousand paid members, generally without restriction. The Society encourages an active interest in Richmond and its community. It is run by a committee of volunteers who communicate with members through regular newsletters and meetings. Its interests include the natural and built environment, infrastructure which includes roads, transport and aircraft, and uses of Richmond town and surrounds in terms of licensing, policing, cleansing and events. The Society campaigns to preserve and enhance Richmond's historic character and the quality of life for residents and visitors. It arranges events for social interaction and enjoyment of its members and the public. It works with other amenity groups and the Council and other public bodies. It covers no defined geographical area but focuses on Richmond Town and its surrounds, including the associated stretch of the River Thames. It has sound finances and raises funds from subscriptions, legacies and campaigns. The money raised is used to run the charity and to invest in projects that benefit the community.

THE KEW SOCIETY

The Kew Society, founded more than one hundred years ago, is an influential organisation dedicated to enhancing the beauty of Kew and preserving its heritage. It became a Society in the 1970s and a Registered Charity in 1987 and remains as one of the larger and more active community groups in Greater London, with a subscribed membership of around six hundred. Its main aims are to review all planning applications in Kew with special regard to the architectural integrity and heritage of the neighbourhood and to play an active role in the improvement of local amenities. To achieve its aims, The Kew Society works closely with local authority councillors and the Member of Parliament; monitors all the planning applications and comments as needed; makes representations to public and private organisations; and provides a forum for local groups to strengthen Kew's voice in the area and in London. The Society is run by unpaid volunteers. The Executive Committee meets eleven times a year while sub-committees look after particular areas of interest. The society organises community events including parties, picnics, lectures and outings and produces the *On Kew* newsletter with information about general local issues, events, planning matters and forthcoming activities.

THE FRIENDS OF RICHMOND GREEN

The Friends of Richmond Green is an amenity action group. It operates for the benefit of residents located in the immediate vicinity of The Green. In geographical terms, the FoRG 'constituency' encompasses the area bounded by the triangle of the railway line, the river Thames and George Street. Its key aims and objectives are: To promote public interest and civic pride in Richmond Green and vicinity; To improve the quality of life and long-term attractiveness for residents; To improve the character and quality of the built and natural

environments; and To encourage responsible use of The Green and surrounding area. FoRG was started over forty years ago and has worked with the Council and other local groups on a number of projects – major improvements to the pedestrian Gateway to Richmond between Old Deer Park and Richmond Green; the up-grading of the network of paths on the Green. The RHC, convened by Friends of Richmond Green and the Richmond and Kew Societies, amalgamates and co-ordinates the efforts of the three bodies to more effectively represent our mutual interests as far as Heathrow expansion and related proposals are concerned. FoRG successfully lobbied the Council to revise the daily timetable for litter collection and in the last couple of years we have seen major improvements in this area. Membership is open to any person who resides in the immediate vicinity of the Green. We do not currently levy any form of charge on our members. Management is vested in an Executive Committee which meets around 8 times a year. The committee and officers are elected each year at an AGM. A newsletter is produced annually.

THE FRIENDS OF OLD DEER PARK

Established in 1987, The Friends of Old Deer Park is a group within the local community constituted with the overall aims of fostering, promoting and sustaining recognition and appreciation of the unique parkland character, amenity value, and particular historic, architectural, archaeological and ecological interest of the Old Deer Park, and securing its preservation and enhancement for the benefit of all. The Friends played an important role in supporting the establishment of the working group for *The Thames Landscape Strategy* in 1991, and successfully worked for and secured the designation of the Old Deer Park by the London Borough of Richmond upon Thames Council as a conservation area in June, 1990, the inclusion of the Old Deer Park on English Heritage's *Register of Parks and Gardens of Special Historic Interest* (as an integral part of the already registered grade I Royal Botanic Gardens, Kew historic landscape) in June, 1998, and its inclusion within the buffer-zone of *The Royal Botanic Gardens, Kew World Heritage Site* in 2003, and the listing of the 1960s *Richmond Swimming Pools* complex in January, 1996, and the late-Victorian sports pavilion/grandstand in the grounds leased by *Richmond Athletic Association* in November, 1997.

THE ST MARGARET'S ESTATE RESIDENTS ASSOCIATION

The St Margaret's Estate Residents Association was established some forty years ago to protect and conserve the area that originally covered the St Margaret's Estate of 1854. The Association includes approximately 330 houses, mainly within the area bounded by the A316, St Margaret's Road, Kilmorey Road and Ranelagh Drive which looks over the river onto the Old Deer Park. The main remit of the Association is to monitor all planning applications within the boundaries of the Association and it also monitors tree lopping and felling, traffic, aircraft noise and any other matter that affects the environment.

OLD DEER PARK DRAFT SUPPLEMENTARY PLANNING DOCUMENT, DECEMBER, 2017

A RESPONSE BY THE OLD DEER PARK WORKING GROUP TO CONSULTATION

JANUARY, 2018

I. INTRODUCTION

- I.1 The Old Deer Park Working Group (the Group) comprises representatives of The Richmond Society, The Kew Society, The Friends of Richmond Green, The Friends of Old Deer Park and The St Margaret's Estate Residents Association. This submission represents the joint response from the five groups.
- I.2 The Group welcomes the publication and consultation on a significantly amended and extended draft Supplementary Planning Document for the Old Deer Park further to the publication and consultation on an earlier draft in October, 2016, on which the Group commented in its submission of the 4th November, 2016. The Group welcomes the satisfactory resolution of the significant anomalies and omissions contained in the earlier draft document identified in the Group's response of November, 2016. The Group commends the authors on the drafting of the revised draft document and for responding positively to the issues raised by the Group at the earlier stage.
- I.3 The Group was formed in 2012 in recognition of the importance of the Old Deer Park and has since been working on immediate issues and on encouraging the preparation of a coherent strategy for the effective conservation, development and management of the Park. The Group started by publishing the report: *The Old Deer Park, Richmond - Re-connecting the Town to its local park - Realising an under-recognised parkland asset – A framework for conservation and enhancement.*
- I.4 The Working Group supports the potential adoption of the draft document subject to the various issues raised in sections 2 to 5 below, and looks forward to adjustments being effected to the present draft that will enable it to convey full support. In addition to setting out our detailed response to the draft document, we have included answers to the eight specific tick-box questions posed in the Council's questionnaire. These should be read in conjunction with our detailed response to the document.
- I.5 In order to assist in easy and ready use and understanding of the document by stakeholders, the public and others and its effective application of the guidance it contains, the Working Group suggests that the document should be printed at A.4 size, with the text in portrait format and the maps in landscape format; the structure of sections, sub-sections and subsidiary sections made clearer (with the point-sizes of their headings adjusted accordingly); and the paragraphs numbered.

- 1.6 The Group would be pleased to discuss its submission with the Council and to provide further information, if requested. Contact: Peter Willan, Chair - The Old Deer Park Working Group at willan829@btinternet.com.

2. THE TERMS USED IN THE DOCUMENT

- 2.1 The Group suggests that the publicly accessible park leased by the Council from the Crown Estate to the north-west and south-east of the Twickenham Road should be referred to throughout the document as the Public Park rather than the Recreation Ground – a term normally associated with modestly scaled, local authority owned public open-spaces of no or only minimal historic and landscape significance used primarily for outdoor sport and walking dogs.
- 2.2 We note the proposed use of the recently adopted term ‘The Old Deer Park Sports Ground’ for that part of Old Deer Park adjacent to the Kew Road immediately to the south of the Royal Botanic Gardens presently used by Richmond Cricket Club, London Welsh Rugby Football Club, The Mid-Surrey Bowling Club, Richmond Tennis Club and The Royal Richmond Archery Club.
- 2.3 We would suggest that in order to avoid confusion, the term ‘The King’s Observatory’ should be used consistently throughout the document. The term ‘Kew Observatory’ was used at the time that the building and surrounding site was used by the Meteorological Office and when the building was first listed in January, 1950. The term ‘The Royal Observatory’ is used in the description accompanying the formal registration of the historic park, and the term ‘King’s Observatory’ used in the description accompanying the formal scheduling of Shene Charterhouse.

3. THE ROLE OF THE DOCUMENT

- 3.1 We note and recognise the aim of the document as stated in Section I – Introduction: ‘...To provide an integrated framework which supports the conservation and enhancement of the Old Deer Park as a historically important and well used recreational and community area of the Borough’, and that the document ‘identifies opportunities to support its maintenance and enhancement’. However, as will be recalled, since 2012 the Working Group has been pressing for ‘a coherent strategy for the effective conservation, development and management of the Park’.
- 3.2 In order to strengthen the document, we urge adjustment in the wording in the first paragraph in Section I to read: ‘...The SPD will ensure that any prospective developments on these sites are sensitive to the significance of the historic landscape

of the Park and the features it contains whilst supporting the important recreational and sporting community activities within it.’

- 3.3 Whilst recognising the approach to implementation and delivery set out in Section 6 of the document, we very much hope that in due course the Council’s Supplementary Planning Document will be complemented by the preparation and publication of a coherent management plan for the Park for potential adoption by the Crown Estate as freeholder and all the lessees including the Council, providing for the realisation of opportunities for the enhancement of the Park and the effective maintenance and repair of its historic features and structures. Such a document should usefully draw upon Kim Wilkie Associates’ still highly relevant *Old Deer Park, Richmond, The Crown Estate Landscape Strategy*, published in September, 1999.

4. THE BOUNDARY OF THE AREA COVERED IN THE SUPPLEMENTARY PLANNING DOCUMENT

- 4.1 We note and recognise the logic of the boundary of the Supplementary Planning Document covering the same boundary as the presently designated Old Deer Park Conservation Area. However, we would urge the inclusion of a statement within either Section 1 or 2 of the document drawing attention to the fact that anomalously, some areas of the historic Park have been excluded from the Old Deer Park Conservation Area – such as the entire area to the south-east of the railway viaduct and embankment adjacent to Old Palace Lane, including the allotments, and the small area at the north-western end of Old Deer Park Gardens. Whilst, the entire area to the south-east of the railway viaduct and embankment falls within the boundary of the Richmond Riverside Conservation Area and, in part, within the boundary of the formally registered Historic Park, we would suggest that the areas presently and anomalously falling outside the boundary of the Old Deer Park Conservation Area should be embraced within the Supplementary Planning Document.

5. DETAILED POINTS FOR ATTENTION

- 5.1 **Section 2 – The Site and its surroundings – Historic context – The evolution of the Old Deer Park – (page 8) – first paragraph, sixth line: ‘Shene’ NOT ‘Sheen’.**
- 5.2 **Section 2 – The Site and its surroundings – Historic context – The evolution of the Old Deer Park – (page 8) - second paragraph, third line: ‘King’s’ NOT ‘Kings’.**
- 5.3 **Section 2 – The Site and its surroundings – Historic context – The evolution of the Old Deer Park – (page 8) - fourth paragraph, seventh line: ‘Commissioners of Woods and Forests’ NOT ‘Commissioner of Woods’.**

- 5.4 **Section 2 – The Site and its surroundings – Historic context – The evolution of the Old Deer Park – (page 8) - fifth paragraph, seventh and eighth lines:** ‘...and Athletic Association’ NOT ‘...Athletics Association’; ‘...Athletic Ground’ NOT ‘Athletics Ground’.
- 5.5 **Section 2 – The Site and its surroundings – Historic context – The evolution of the Old Deer Park – (page 8) - sixth paragraph, sixth line:** ‘...the Richmond Athletic Association Ground’ NOT ‘...the Richmond Athletics Association Ground’.
- 5.6 **Section 2 – The Site and its surroundings – Historic context – The evolution of the Old Deer Park – (page 8) - seventh paragraph:** Add: ‘The renowned Richmond Royal Horse Show flourished until 1967’.
- 5.7 **Section 2 – The Site and its surroundings – Historic context – The evolution of the Old Deer Park – (page 8) - eighth paragraph, second and seventh lines:** ‘...the Athletic Ground’ NOT ‘...Athletics Ground’; ‘...Richmond Athletic Association’ NOT ‘...Richmond Athletics Association’.
- 5.8 **Section 2 – The Site and its surroundings – Historic context – Heritage assets - (page 8):** ‘The King’s Observatory (previously known as Kew Observatory) NOT ‘Kew Observatory’; ‘Three obelisks’ NOT ‘Obelisks’.
- 5.9 **Section 2 – The Site and its surroundings – Historic context – Figure 3: Heritage assets - (page 9):** The listed obelisk located close to The King’s Observatory within the Royal Mid-Surrey Golf Club course (one of the two, listed obelisks within the course) has been omitted from the map. Instead the small, unlisted obelisk within the publicly accessible part of the Park has been shown. We very much hope that it can be identified as a ‘Building of Townscape Merit’ and added to the *National Heritage List* in due course.
- 5.10 **Section 2 – The Site and its surroundings – Historic context – Landscape views and open space - (page 10) - Third paragraph:** Reference is made to the Council’s *Local Plan Proposals Map* of July, 2015. As the group has argued at the recent hearings into the *Draft Local Plan*, NO amended *Proposals Map* has been published and made subject of consultation with the latest version of the *Local Plan*. The Working Group remains firmly of the view that the anomalous boundaries of Metropolitan Open Land and Public Open Space shown in the *Proposals Map* of July, 2015 which exclude the Pools-on-the-Park complex need to be corrected.
- 5.11 **Section 2 – The Site and its surroundings – Historic context – Figure 5: Transport and accessibility - (page 11):** Anomalously, the two sets of bus-stops close to Richmond Station which serve no less than twelve bus-routes, and which those wishing to access the Park would use, have been omitted. The bus-stops on the south-eastern side of Kew Road opposite the Lion Gate into Kew Gardens, opposite the Old Deer Park Sports Ground and further south-westwards along the road have been omitted.

Richmond Station is wrongly annotated 'Richmond Rail Station' and no reference is made to its being served by South Western Railway, London Underground and London Overground trains, and by a taxi rank. Anomalously, a number of the long-established pedestrian access-points into the Park are omitted. These include the access from the south-western end of Park Lane, the several access points along Kew Foot Road, and the two entrance-points from Kew Road.

- 5.12 **Section 3 - Planning policy context – Local planning policy - (page 12) - Third paragraph, Eighth line:** Reference is made to 'The Publication Local Plan' taking 'into account responses made during the public consultation in summer 2016'. Regrettably this is not correct, given the failure of the Council to properly address the Working Group's repeated and clearly expressed concerns about the anomalous boundaries of Metropolitan Open Land and Public Open Space shown in the *Proposals Map* of July, 2015 which exclude the Pools-on-the-Park complex.
- 5.13 **Section 3 - Planning policy context – Key planning policies, Local Plan, 2017 - (pages 11 and 12):** Adjustments in wording need to be made to reflect the proposed main modifications relating to Policy LP3 and site specific allocations SA 22 and 23 (relating to The Pools-on-the-Park and the Richmond Athletic Association Ground) put forward by the Council (and currently subject to public consultation) in response to the main modifications to the *Local Plan* recommended by the Inspector further to the hearings held late last year. Further adjustments to the wording may need to be made in the light of the outcome of the public consultation on the proposed main modifications.
- 5.14 **Section 3 - Planning policy context – Other information policies – (page 14):** The Working Group considers it most regrettable that given its strategic significance, Kim Wilkie Associates' still highly relevant *Old Deer Park, Richmond, The Crown Estate Landscape Strategy*, published in September, 1999, has been relegated to the tail end of the schedule of 'Other information sources'. It is likely that J.S. Conservation Management & Town Planning Ltd's *Statement of significance: Richmond Public Baths (sic), Old Deer Park, Richmond* may require amendment before it can be adopted by the Council.

The list needs to be extended to include reference to the formal entries and descriptions for the various designated assets in the Park included in the *National Heritage List for England*.

- 5.15 **Section 4 – Analysis of the current facilities across the Old Deer Park – Wider considerations – Recreation ground (sic) - (page 16):** Reference is rightly made to the challenges posed by the use of the Park for large-scale outdoor sporting events and the problems generated by the provision of temporary access for large vehicles for setting-up and taking-down temporary structures, etc. However, as presently drafted, neither this section nor Section 5 – The future role of the Old Deer Park, provide any

clear and specific guidance on how such events together with circuses and temporary use of the landscaped area around the Pools-on-the-Park should be planned, located and managed in order to ensure that the parkland character of the area is not compromised or harmed

We note with concern the apparent absence from both Sections 4 and 5 of references to the issue of noise-generation from the Old Deer Park and the need to explore and adopt measures to mitigate the adverse impact of such noise generation on the parkland character of the areas to the north-west and south-east of the Twickenham Road.

- 5.16 **Section 4 – Analysis of the current facilities across the Old Deer Park - Outdoor sports provision – Old Deer Park Sports Ground (London Welsh Rugby Football Club) – (page 18):** There is one match pitch and two training-pitches – one of which can be floodlit.
- 5.17 **Section 4 – Analysis of the current facilities across the Old Deer Park - Indoor sports facilities – Swimming – (page 18) - First paragraph, third line:** The outdoor pool is 25 m. in length, NOT 33.3 m.
- 5.18 **Section 4 – Analysis of the current facilities across the Old Deer Park - Indoor sports facilities – Swimming – (page 18) - First bullet-point:** We note the suggestion that the age of the Pools-on-the-Park complex ‘creates concerns over its ability to meet the needs of residents in the long term’. However, we would observe that there are many listed and other historic swimming pools across the country very much older than the Pools-in-the-Park complex which continue to function successfully with or without significant upgrading.
- 5.19 **Section 4 – Analysis of the current facilities across the Old Deer Park - Indoor sports facilities – Swimming – (page 18) - Seventh bullet-point:** It is difficult to see how the provision of a 50m. pool can be accommodated on the Pools-on-the-Park Site given the conservation and other planning constraints referred to elsewhere in the document.
- 5.20 **Section 4 – Analysis of the current facilities across the Old Deer Park – Health and fitness facilities – (page 20):** Anomalously, as presently drafted, the document fails to refer to the poor design and harmful impact on the character and appearance of the Park of the existing health and fitness facility, squash courts and adjacent car-parking on the Richmond Athletic Ground and the squash courts on the Old Deer Park Sports Ground, and the need to resolve the problems.
- 5.21 **Section 4 – Analysis of the current facilities across the Old Deer Park – Community and voluntary sector uses – Old Deer Park Car-park - (page 20):** Anomalously, as presently drafted, the document fails to refer to the poor design and harmful impact on the character and appearance of the Park of the existing Council-owned voluntary

sector buildings – some now disused and derelict AND the poor condition of the Council-owned, long disused public conveniences, and the need to resolve the problems.

- 5.22 **Section 4 – Analysis of the current facilities across the Old Deer Park – Wider considerations - Royal Mid-Surrey Golf Club – (page 21) - Third paragraph – First and seventh lines:** Reference is made to ‘The service road and access located along the boundary between the Golf Course and the Royal Botanic Gardens, Kew...’.

Firstly, it is entirely misleading to refer to the vehicular access from the Kew Road just south of the Lion Gate leading to the Oxenhouse Gate to the Gardens and further beyond to the Golf Course as a ‘road’. It is effectively an un-made drive. Secondly, it isn’t located between the Golf Course and the Gardens, rather it is located between the Old Deer Park Sports Ground and the Gardens, and only continues onwards modestly into the Golf Course.

Importantly, we understand that the emerging, revised *Royal Botanic Gardens, Kew, Landscape Management Plan* no longer proposes the creation of a link between the Kew Road and the river along the southern boundary of the Gardens.

- 5.23 **Section 4 – Analysis of the current facilities across the Old Deer Park – Wider considerations - Recreation ground (sic) – (page 21):** The statement fails to refer to the parkland character and ecological interest of much of the area and the particular attractiveness of the ‘wild’ and wooded area between the Twickenham Road and the railway, used by many walkers, and along the banks of the water-filled ha-ha.

- 5.24 **Section 4 – Analysis of the current facilities across the Old Deer Park – Wider considerations – The Old Deer Park Car Park and public open space – (page 21) - First paragraph:** Reference should be made to damaging impact on the character and appearance of the Park resulting from the excessive and poorly designed signing and the lack of a co-ordinated approach to the design and finish of the street-furniture.

- 5.25 **Section 4 – Analysis of the current facilities across the Old Deer Park – Wider considerations – The Old Deer Park Car Park and public open space - (page 21) - Second paragraph:** What does ‘the public open space offer of the Park’ mean? Surely the area represents a much valued and attractive parkland area and is a major asset to the Park as a whole? Importantly, it is NOT ‘little used’. It is well used, particularly by dog-walkers.

- 5.26 **Section 5 - The future role of the Old Deer Park – (page 22) – First paragraph:** In order to strengthen the document, we would suggest adjustment in the wording of the paragraph to read: ‘There are opportunities to sustain the significance of the historic landscape of the Park and the features it contains as well as supporting its wildlife and nature conservation role, improving the existing sports, recreation and community facilities and enhancing access into and around the Park’.

5.27 **Section 5 - The future role of the Old Deer Park – (page 22) – Third paragraph:** The reference to ‘opportunities for wider enhancements’ needs clarification.

5.28 **Section 5 – The future role of the Old Deer Park – Improving the quality of the Old Deer Park – (page 22):** We would observe that there are further issues that might be listed in addition to those identified in the six bullet-points.

The section should provide a clear commitment by the Council to using its planning powers to apply rigorous control over proposals for built development encroaching into the historic Park (and on to Metropolitan Open Land) – recent examples being part of the group of porta-cabins comprising the Old Deer Park School adjacent to the Old Deer Park Car-park annexe and the porta-cabin serving the care-hire business in the Athletic Ground.

Similarly, the section should provide for a clear commitment by the Council to use its planning powers to pursue enforcement action against existing unauthorised development within the Park where it has a damaging impact on the character and appearance of the Park, and to pursue appropriate action to secure the repair of its own properties and encourage the repair of properties outside its ownership where it has damaging impact on the character and appearance of the Park.

5.29 **Section 5 – The future role of the Old Deer Park – Improving the quality of the Old Deer Park – Gateways – (page 25) - Second paragraph, fourth line:** ‘...through the side-gate of a well restored, late-Victorian gateway comprising the four, original, brick piers with modern, steel gates between’ NOT ‘...a pillared and gated entrance’. Surely, given the modest width of the pedestrian side-gate, it should not be used for cyclists – other than when dismounted.

5.30 **Section 5 – The future role of the Old Deer Park – Improving the quality of the Old Deer Park – Gateways - (page 23) - Third paragraph, third line:** ‘...surviving gate-piers of the original four’ NOT ‘surviving gate pillars’. A commitment to reinstate the two, missing gate-piers for both pedestrian safety and conservation reasons should be added. (A similar arrangement as that successfully implemented in relation to the gateway on to The Green).

5.31 **Section 5 – The future role of the Old Deer Park - Improving the quality of the Old Deer Park – Enhancements to car park areas – (page 23):** Surely there should be specific reference to address the excessive and poorly designed signing and the lack of a co-ordinated approach to the design and finish of the street-furniture and adopt an approach consistent with the Council’s own *Public Space Design Guide* of 2006.

5.32 **Section 5 – The future role of the Old Deer Park – Improving access within the Old Deer Park - Pedestrian access - (page 24):** The inclusion of one or more annotated diagrams in the document to show potential opportunities for improving and enhancing safe pedestrian access to and from the Park would be of considerable value

in advancing proposals. In particular, it would be most useful to include schematic proposals for:

- The provision of a raised, timber board-walk at the south-western end of that part of the Park between the railway viaduct and the embankment carrying the Twickenham Road and the landward-arch of Twickenham Bridge facilitating access between the two parts of the public Park when the area is flooded.
- The creation of a safe and attractive pedestrian route through the Old Deer Park Car-park linking the access from Park Lane to that part of the Park between the railway and the Twickenham Road. And
- The creation of inclined pathways set within the embankments to each side of the Twickenham Bridge approach to facilitate pedestrian access between the footways on each side of the road and the areas of the Park to each side of the road at the lower level.

- 5.33 **Section 5 – The future role of the Old Deer Park – (page 28):** The heading ‘Old Deer Sports Ground’ is missing from the top of the page.
- 5.34 **Section 5 – The future role of the Old Deer Park: Pools on the Park – (page 29) - First paragraph, second line:** ‘...with landscaped amenity areas adjacent to the outdoor pool’ NOT ‘with lawned sunbathing outdoor areas’.
- 5.35 **Section 5 – The future role of the Old Deer Park: Pools on the Park – (page 29) - Second, third, fourth, fifth, sixth, seventh and eighth paragraphs:** As noted in paragraph 5.14 above, J.S. Conservation Management & Town Planning Ltd’s *Statement of significance: Richmond Public Baths (sic), Old Deer Park, Richmond* may require amendment before it can be adopted by the Council.
- 5.36 **Section 5 – The future role of the Old Deer Park: Richmond Athletic Ground - (page 29):** As suggested in paragraph 5.20 above, as presently drafted, the document fails to refer to the poor design and harmful impact on the character and appearance of the Park of the existing health and fitness facility, squash courts and adjacent car-parking on the Richmond Athletic Ground and the need to resolve the problems.
- 5.37 **Section 5 – The future role of the Old Deer Park: Car park and community uses within the Old Deer Park – (page 30) – Twelfth paragraph:** The building presently occupied by the Royal Mail adjacent to the gateway into the Park from Park Lane comprises the former East Surrey Regiment TA Drill Hall of 1912 and its annexe of 1932 - both built on land falling within the historic park – as clearly evident from the 18th century boundary-wall to the Park which runs behind the complex. Whilst we understand that the lease on the complex granted by the Crown Estate runs until October, 2070, there is a real possibility that the Royal Mail may surrender the lease at

some earlier stage. Accordingly, consideration should be given to embracing within the document the potential future of the site for appropriate re-use and development, retaining and incorporating the architecturally and historically significant 1912 Drill Hall building. We note that anomalously, it is stated without question that the building ‘continues to be needed to support the operational requirements of the (Royal Mail) business and therefore has not been identified as part of the any wider proposals’.

- 5.38 **Section 5 – The future role of the Old Deer Park: Figure 5 (sic): Area of focus for potential change – (page 31):** This annotated map should be titled ‘Figure 6’ and references to it adjusted accordingly – ‘Figure 5: Transport and accessibility’ already exists on page 11.

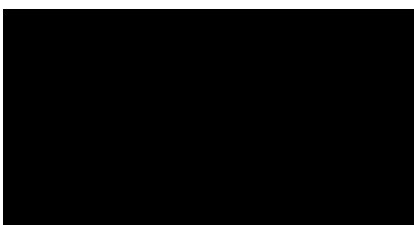
As noted in paragraph 5.9 above, the listed obelisk located close to The King’s Observatory within the Royal Mid-Surrey Golf Club course (one of the two, listed obelisks within the course) has been omitted from the map. Instead, the small, unlisted obelisk within the publicly accessible part of the Park has been shown. We very much hope that it can be identified as a ‘Building of Townscape Merit’ and added to the *National Heritage List* in due course.

- 5.39 **Section 6 – Implementation and delivery – (page 32) - Tenth bullet point:** We remain unclear about the reference to London Scottish, London Welsh and Richmond Rugby Football Club working ‘with the Council to maximise the current capacity of the rugby pitches within the Recreation Ground (sic)’.

- 5.40 **Section 6 – Implementation and delivery – (page 32) - Twelfth bullet point:** In relation to the Council working with the Crown Estate, we would refer to our comments set out in paragraph 3.3 above:

‘Whilst recognising the approach to implementation and delivery set out in Section 6 of the document, we very much hope that in due course the Council’s Supplementary Planning Document will be complemented by the preparation and publication of a coherent management plan for the Park for potential adoption by the Crown Estate as freeholder and all the lessees including the Council, providing for the realisation of opportunities for the enhancement of the Park and the effective maintenance and repair of its historic features and structures. Such a document should usefully draw upon Kim Wilkie Associates’ still highly relevant *Old Deer Park, Richmond, The Crown Estate Landscape Strategy*, published in September, 1999’.

In this connection, we would suggest that Kim Wilkie should be consulted on the final draft of the present Supplementary Planning Document before its adoption.



22nd January, 2018.

Dear 

THE POOLS-ON-THE-PARK COMPLEX, OLD DEER PARK, RICHMOND - DRAFT STATEMENT OF SIGNIFICANCE

1. Many thanks for providing the opportunity of commenting informally on JS Conservation Management & Town Planning Ltd's draft *Statement of Significance: Richmond Public Baths, Old Deer Park, Richmond* of September, 2017, commissioned, I assume, by the Richmond-upon-Thames Council, and running in parallel with public consultation on the revised draft *Old Deer Park Supplementary Planning Document* launched in early December and closed today.

2. I very much welcome the preparation of the draft document and anticipate that it will also be welcomed by the Old Deer Park Working Group. In this connection, I will relay any additional comments by members of the Working Group at the earliest opportunity.

3. I particularly value the opportunity of commenting on the draft document: as a user of the pools complex since its opening in 1966; having known personally both Leslie Gooday, its architect, and Michael Brown, its landscape architect; having been directly involved in campaigning under the auspices of The Richmond Society and The Friends of Old Deer Park together with the Save Richmond Pool Action Group in 1987-1989 against proposals for its complete demolition and redevelopment as part of a vastly over-sized and poorly designed indoor skating-rink and swimming-pool complex with multi-level car-parking put forward by developer, London and Edinburgh Trust and granted Planning Permission under highly

questionable circumstances by the former SDP-Liberal Alliance Council administration in March, 1989, despite the opposition of the Royal Fine Art Commission and the local community; having been directly involved with the Friends of Old Deer Park in securing the designation of the Old Deer Park as a conservation area in June, 1990, and, up to 1993, having been involved with the Friends in securing the designation of the Park as an extension to the grade I Royal Botanic Gardens, Kew registered historic park in January, 1994; and, up to 1993, having been directly involved with The Friends of Old Deer Park in working to secure the formal listing of the existing complex in January, 1996.

4. At the outset, may I confirm that I support for the principle of addressing and assessing the potential scope for a conservation-based development of the site aimed at preserving the significant parts and features of the existing, listed pools complex and its landscaped setting whilst introducing sensitively designed improvements and appropriately scaled additions aimed at equipping the complex to meet the needs of coming years.

5. Whilst I support much of the assessment of the relative architectural and historic significance of the various parts of the existing pools complex and its landscaped setting set, both individually and cumulatively set out in limited part in Section 2 - *Statement of significance* and, anomalously, in greater detail in Section 3 – *Capacity for change*, and much of the assessment of the relative capacity for change to various parts of the existing complex and its landscaped setting set, both individually and cumulatively set out in Section 3 – *Capacity for change*, I am very disappointed by the serious omissions and other deficiencies in the *Introduction* and in Section 1 – *Understanding the heritage*, and believe that the document requires review and significant amendment before it can be properly and formally adopted by the Council.

6. I set out my specific concerns below:

THE TITLE OF THE DOCUMENT

7. The Pools-on-the-Park Complex has not been known as ‘Richmond Public Baths’ since at least 1993. Whilst the formal entry for the complex in the *National Heritage List for England* refers to the complex as ‘Richmond Baths’, the complex was appropriately rebranded as the ‘Pools-on-the Park’ at the time of its reopening after extensive refurbishment in July, 1993 and remains known as such over the years since. Up until the time of its closure for major repairs in October, 1992, the complex included twenty-four private baths for the use of those living in the area who did not have baths in their own homes. Accordingly, the term ‘Richmond Baths’ was not entirely inappropriate in past years.

8. The term ‘baths’ is used throughout the draft document, when it would be clearer and more correct to refer to ‘swimming-pools’, ‘pools’ or ‘pools complex’.

INTRODUCTION AND SECTION 1: UNDERSTANDING THE HERITAGE

9. From the considerable omissions and other deficiencies in these sections of the draft document, it would appear that the authors have neither spoken to those in the local community who have been closely involved with the pools complex over the last forty or more years nor read all the relevant publications and documentation covering those years – not least, about the controversy regarding the siting of the new pools complex in the Old Deer Park in the first place; the significant involvement of the Royal Fine Art Commission in the design of the complex (and, in later years, the campaign to secure its preservation from demolition); and the great campaign by the local community in the late-1980s and the 1990s to preserve the complex from demolition and redevelopment and to secure formal recognition of its special architectural and historic interest and that of its setting. This is a fundamental omission in relation to any proper assessment and understanding of the historic value, aesthetic value and communal value of the existing complex.

10. Throughout the draft document, particular emphasis is laid on ‘significance’ – to use the entirely non-statutory term used in the current policy document – the *National Planning Policy Framework* – and in the relevant current published guidance of Historic England. Anomalous, little if any reference is made to the inclusion of the pools complex in the *Secretary of State’s List of Buildings of Special Architectural or Historic Interest* nor to the formal inclusion of the Old Deer Park, in which the pools complex is set, in English Heritage’s *Register of Parks and Gardens of Historic Interest* as part of the grade I Royal Botanic Gardens, Kew – both designations now embraced by inclusion on the *National Heritage List for England*.

11. Similarly, anomalously, no reference is made in Section 1 to the specific entries and descriptions of the pools complex or to the Old Deer Park contained in the *National Heritage List for England*, nor importantly to the location of the complex and the Park within the formally designated Old Deer Park Conservation Area. The listing-entry for the pools complex is only attached as an Appendix, and the entry and description for the historic park is not attached at all. Only a very brief and incomplete reference is made to part of the description attached to the formal listing-entry in Section 2 – *Statement of significance* at page 17. A most serious omission from the draft document is the failure of the document to address the contribution made by the pools complex and its landscaped setting to the particular special historic interest AND significance of the registered historic park and to the character and appearance AND significance of the conservation area.

12. Similarly, no reference is made in either Section 1 – *Understanding the heritage* or, importantly, in Section 3 – *Capacity of change*, to the fundamental requirement under Section 16 of *the Planning (Listed Buildings and Conservation Areas) Act, 1990* to the fundamental requirement for the local planning authority or the Secretary of State to ‘have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses’ when considering an application for Listed Building Consent.

13. Anomalously, too, no attempt is made in Section 1 – *Understanding the heritage* to properly determine and define the extent of the curtilage of the listed pools complex and its landscaped setting and what may be properly considered as forming an integral part of the formally designated heritage asset. It is clearly essential that the boundary-walls of the landscaped setting of the pools complex and the sports changing building should be clearly shown as forming an integral part of the formally designated asset. In this connection, anomalously, no appropriately scaled map or site-plan of the entire pools complex and its landscaped setting is provided in the draft document with which to assist in a proper understanding of the extent of the curtilage. Similarly, no map is provided in the draft document to show the pools complex and its landscaped setting within the context of the Registered Historic Park or the conservation area - Figure 2 does not suffice for either purpose.

14. The absence of a detailed site-plan precludes any proper understanding of the critical role and particular and considerable special interest and significance of the boundary-walls of the landscaped setting of the pools complex, and, to a lesser extent, the role of the sports changing room. Importantly, the absence of such a site-plan means that the free-standing wall separating the pedestrian approach from the Twickenham Road to the main entrance from the adjacent car-park adjacent which was such an important feature of the original architectural and landscape design of the complex and which was only removed in recent years has been left entirely without comment. Similarly, the absence of a detailed site-plan also means that the regrettable subdivision of the once entirely unified landscaped setting of the pools complex in recent years is left entirely without comment.

15. Most regrettable is the absence of any meaningful references in the draft document to the boundary-wall to the landscaped setting of the pools complex which forms such a highly significant part of Michael Brown's design, and to the regrettable loss of the solid, slate copings to the wall which formed part of their particular special interest.

16. Quite extraordinarily, the draft document contains no plans or photographs of the pools complex and its landscaped setting as first completed in 1966. This is a major omission, which could be easily remedied by appending a copy of the 13-page, detailed and well-illustrated account of the complex published in the 1st November, 1967, issue of *The Architects' Journal* - 'Swimming baths in Old Deer Park, Richmond, Surrey'.

17. Similarly and extraordinarily, the draft document contains no decent architectural plans of the complex as it presently exists or any photographs of the external elevations of the complex as it presently exists. Such plans could be easily prepared by adjustments to the plans published in the 1st November, 1967, issue of *The Architects' Journal* - 'Swimming baths in Old Deer Park, Richmond, Surrey', assuming that the Council has mislaid copies of the original architects' drawings submitted in support of the application for Planning Permission and for other approvals.

18. The inclusion of such plans and photographs of the complex as first completed and as existing are essential to ensuring a clear and full understanding of the character and quality of the pools complex and its landscaped setting as first completed and the extensive changes that have been effected since - both externally and internally.

19. Such changes have included the most regrettable loss of the original, finely detailed patinated copper-sheet cladding of the upper part of the pools hall and lesser parts of the complex – the patination of the copper-sheet having been specifically intended by the architect and supported by the RFAC - and the substitution of non-patinating copper cladding with crudely-detailed parapet copings; the very damaging subdivision both horizontally and vertically of the once lofty, well-proportioned and impeccably-detailed main entrance-hall; the proliferation of unsightly unauthorised M +E plant on the roofs of the pools hall and lesser parts of the complex; and the introduction of unattractive sodium-source lighting in the pools hall. None of these issues are picked-up in the draft document, nor recognition expressed of the desirability for their effective remedy, except for and commendably, the potential reinstatement of the full height of the entrance hall.

20. On page 6, it is stated misleadingly that 'The Old Deer Park is much more 'built-up than the Royal Botanic Gardens to which the parkland adjoins...'. Whilst this may be true in respect of the public park to each side of the Twickenham Road (as leased by the Council from the Crown Estate) it would be an exaggeration to apply this to the Old Deer Park as a whole. The suggestion that 'The parkland is... very well vegetated, particularly around the boundaries' is a curious statement. Is it really intended to omit reference to the many fine trees in the Park? Curious too, is the complete absence from the document of any reference to Kim Wilkie Associates' highly relevant *Old Deer Park, Richmond, The Crown Estate Landscape Strategy* of September, 1999, which provides an authoritative account of the landscape history and character of the Park. This omission should be remedied.

21. Surprisingly, the authors of the document fail to include any references to Powell and Moya's listed Putney Swimming Pools and Dryburgh Hall of 1968 in Section I – *Understanding the heritage* which is a close contemporary of the pools complex in the Old Deer Park designed to meet the similar needs of the residents and others in the context of a south-west London suburb.

22. Surprisingly, too, is the absence of any reference to the significant involvement of the Royal Fine Art Commission in the design of the complex (and, in later years, the campaign to secure its preservation from demolition). Similarly, it is quite extraordinary that the highly relevant and extensive citation relating to the swimming pools complex under the *Civic Trust Awards* of 1967 is not quoted on page 13 of the draft document, nor, indeed the similarly relevant and extensive appraisal published in the 1st November, 1967 issue of the *Architects' Journal*.

23. Is the suggestion on page 14 that 'The building also incorporates large swathes of glass curtain walls, steel, concrete and copper roofing which is a very fine example of 1960's

vernacular’ really a sound reflection of the character and quality of the building? Surely, this is not ‘1960s vernacular’. Such a term is surely very much more applicable to the 1960s work of renowned local housing architects Darbourne and Darke?

24. No mention is made of the fact that the ill-conceived, unsightly and highly damaging ‘Wild Waters’ flumes facility thankfully removed in its entirety as part of the refurbishment of the pools complex in 1992-1993 was added in 1985 despite local opposition and seriously detracted from the operation and amenity of the pools complex.

25. Of considerable concern is the omission of any reference to the major, public controversy generated by the proposals for the demolition and redevelopment of the pools complex and its landscaped setting as part of a vastly over-sized and poorly designed indoor skating-rink, indoor bowling facility and swimming-pool complex with multi-level car-parking put forward by developer, London and Edinburgh Trust between 1987 and 1989; the campaign by The Richmond Society and The Friends of Old Deer Park together with the Save Richmond Pool Action Group in 1987-1989 against the proposals; and the granting of Planning Permission by the former SDP-Liberal Alliance Council administration in highly questionable circumstances in March, 1989, despite the opposition of the Royal Fine Art Commission and the local community. Similarly, no mention is made of the most fortunate aborting of the approved scheme resulting from the failure of the Council to secure the recover the sub-lease granted to the operator of the ‘Wild Waters’ flumes facility by a specific deadline as required under the legal agreement between the Council and the prospective developer, and the consequential abandonment of the scheme by the developer and the payment instead of a substantial financial sum to the Council by way of compensation – later used to support the funding of the refurbishment scheme.

26. These important aspects of the history of the pools complex and its landscaped setting are essential to a clear and full understanding of why the pools and its landscaped setting still survive today and their omission from the draft document precludes any proper assessment and understanding of the historic value, aesthetic value and communal value of the existing complex and its landscaped setting.

27. The reference on page 16 to the suggestion that ‘much of the external appearance still exhibits the original detailing needs to be qualified. See paragraph 19 above.

SECTION 2 – STATEMENT OF SIGNIFICANCE

28. I am unclear why the five-part scale of ‘significance’ with definitions given on pages 17 and 40 of the draft document – the source of which it is not stated – is different to the four-part scale of ‘significance’ and the definitions given on page 25 and 36 - which is stated as being sourced from a publication by the Prince’s Regeneration Trust of 2009. This scale, together with the four-part scale of ‘capacity for change’ and the definitions would appear to be the extract from a sample report printed on page 15 of *How to write conservation reports*,

published by The Prince's Regeneration Trust in 2009 rather than the five-levels of significance printed on page 25 of the same document.

29. It is assumed that the reference to 'neutral significance' in the 'Scale of significance' given on pages 17 and 40 of the draft document and in the levels of significance printed on page 25 of the Trust's publication, is to be construed as an absence of any special architectural or historic interest or any heritage significance.

30. It is to be regretted that the plans and sections published in published in the 1st November, 1967, issue of *The Architects' Journal* - 'Swimming baths in Old Deer Park, Richmond, Surrey' have not been used, with adjustments as necessary, as the base diagrams on pages 26 to 37. This would facilitate a clear and full understanding of the assessments given on each page.

31. Anomalously, the assessments of the comparative levels of significance of the listed complex and its respective parts are contained in Section 3 – *Capacity for change*, rather than in Section 2 – *Statement of significance*.

SECTION 3 – CAPACITY FOR CHANGE

32. As noted in paragraph 12 above and most importantly, no reference is made in either Section 1 – *Understanding the heritage* or, importantly, in this section to the fundamental requirement under Section 16 of *the Planning (Listed Buildings and Conservation Areas) Act, 1990* to the fundamental requirement for the local planning authority or the Secretary of State to 'have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses' when considering an application for Listed Building Consent – only reference is made to Section 66 of the Act relating to the fundamental requirement for the local planning authority or the Secretary of State to 'have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses' when considering an application for Planning Permission.

COMMENTS ON THE ASSESSMENTS GIVEN ON PAGES 26 TO 37

33. Asset no. 1: 'Considerable significance' agreed; 'High capacity' for internal change only agreed providing that this serves to reverse the very damaging subdivision both horizontally and vertically of the once lofty, well-proportioned and impeccably-detailed main entrance-hall. I very much welcome the suggestion that 'consideration should be given to reinstating the experience of the full height' of the space. I would suggest that the capacity for external change is 'Very low'.

34. Asset no. 2: 'Considerable significance' for the ground floor of the two-storey, former private baths, offices and flat block not agreed; I would suggest that it is of only 'Some significance'; 'High capacity for change' agreed.
35. Asset no. 3: 'Considerable significance' agreed; 'High capacity' for internal change only agreed. I would suggest that the scope for external change is 'moderate' rather than 'high'.
36. Asset no. 4: 'Exceptional significance' agreed; 'Very low capacity' for change agreed.
37. Asset no. 5: 'Exceptional significance' agreed; 'Very low capacity' for change agreed.
38. Asset no. 6: 'Exceptional significance' agreed; 'Very low capacity' for change agreed.
39. Asset no. 7 – including the boundary-walls: 'Exceptional significance' agreed; 'Moderate capacity for change' not agreed; suggest 'Very low capacity for change'.
40. Asset no. 8: 'Exceptional significance' agreed; 'Very low capacity' for change agreed.
41. Asset no. 9: 'Exceptional significance' agreed; 'Very low capacity' for change agreed.
42. Asset no. 10: 'Considerable significance' agreed, but only in respect of the upper part of the former entrance hall; I would suggest that the upper floor of the two-storey former private baths, offices and flat block is of only 'Some significance'; 'High capacity for change' only agreed in relation to the upper floor of the two-storey former private baths and offices and flat block, and for internal change in respect of the upper part of the former entrance hall providing that this serves to reverse the very damaging subdivision both horizontally and vertically of the once lofty, well-proportioned and impeccably-detailed main entrance-hall. I very welcome the suggestion that 'consideration should be given to reinstating the experience of the full height' of the space. I would suggest that the capacity for external change of the former entrance hall element is 'Very low'.
43. Entirely missing from the series of 'assets' and the assessments of their comparative significance and capacity for change are the Sports changing room and the hard-paved landscape and car-park to the immediate north-west of the pools complex which clearly form part of the curtilage of the listed asset, be they of lesser special interest and significance of the overall site.
44. Overall significance and overall capacity for change (not 'to change'): Amazingly, missing from these assessments are the landscaped setting to the pools complex, including the integral boundary-walls and the sports changing room and the hard-paved landscape and car-park to the immediate north-west of the pools complex which clearly form part of the curtilage of the listed asset.
45. From what is shown in the diagrams (see paragraph 42 above) I agree with the assessment of the relative significance of the areas identified as of 'Exceptional and considerable significance', except for the inclusion of both the upper and lower floors of the

two-storey, former private baths, offices and flat block not agreed; I would suggest that the block is of only 'Some significance'; 'High capacity for change' agreed.

46. From what is shown in the diagrams (see paragraph 42 above) I agree with the assessment of the comparative capacity for change (not 'to change') of the areas identified as offering 'Very low capacity' but would question the identification of the single-storey 'changing rooms and studio areas and the 'foyer' (both levels) as offering 'High capacity' for change. I would suggest these areas should be identified as offering 'Moderate capacity for change'. However, as reflected in my comments above, I fully agree with the identification of the two-storey 'gym and health suite' block as offering 'High capacity for change'.

47. In relation to the bibliography and list of references, I note the absence of the following:

- The 1st November, 1967, issue of *The Architects' Journal* - 'Swimming baths in Old Deer Park, Richmond, Surrey';
- The highly relevant and extensive citation relating to the swimming pools complex under the Civic Trust Awards of 1967;
- The correspondence between English Heritage and the Friends of Old Deer Park, The Twentieth Century Society and the Civic Trust relating to requests for the listing of the pools complex - Historic England's Designation Team should retain copies, and the relevant reports of English Heritage's Listing Team;
- The entry and accompanying description in the *National Heritage List for England* relating to the inclusion of the Old Deer Park as an extension to the grade I registered Royal Botanic Gardens, Kew Historic Park of 1987/January, 1994
- *Listing of Richmond Baths – Pools-on-the-Park – Appendix I: Evidence for widespread public support – Compiled by The Friends of Old Deer Park*, January, 1995 – Historic England's Designation Team should retain a copy;
- 'Richmond Baths' extension threatened by listing', *The Architects' Journal*, 7th September, 1995; and
- *Old Deer Park, Richmond, The Crown Estate Landscape Strategy* Kim Wilkie Associates, September, 1999 – the Council should have one or more copies.

CONCLUSION

48. In relation to the structure and format of the draft document, I would suggest that in order to assist in easy and ready use by stakeholders, the public and others and the

effective application of the guidance it contains, the ordering of the sections and sub-sections should be reviewed and amended and the paragraphs numbered.

49. Finally, I would very willing to sit down with you and the authors of the document to run through and clarify my comments insofar as this may be helpful, and to share copies any documentation from my files on the Old Deer Park and the Pools-on-the Park complex and its landscaped setting in particular which the authors may not have located from other sources.

Kind regards,

Paul

PAUL VELLUET, M.Litt., RIBA, IHBC, CHARTERED ARCHITECT



LONDON BOROUGH OF RICHMOND-UPON-THAMES LOCAL PLAN

A STATEMENT BY CHARTERED ARCHITECT AND BOROUGH RESIDENT, PAUL VELLUET, REGARDING SITE-SPECIFIC PROPOSAL SA 19 – RICHMOND STATION, RICHMOND, FOR PRESENTATION AT THE RELEVANT HEARING SESSION OF THE INSPECTOR'S EXAMINATION, SEPTEMBER, 2017

I. INTRODUCTION

- I.1 I am submitting this statement in an entirely independent capacity as a locally-based architect, as resident of the Borough since 1948 and as regular user of Richmond Station since September, 1962. I am a former Chairman of The Richmond Society and have recently been appointed as President of the Richmond Local History Society. I am a member of the RIBA's Awards Group and a former member of the RIBA's Planning Group. From 1991 until 2004, I worked as Regional Architect and Assistant Regional Director of English Heritage, London. In past years I have served on the Executive Committee of the Richmond Society and on the Richmond-upon-Thames Council's Conservation Areas Advisory Committee. I attach fuller particulars of my qualifications and experience in Appendix A.
- I.2 In this statement I convey my serious concern regarding the soundness of specific aspects of the Council's final (published) version of the *Richmond-upon-Thames Local Plan* relating to Richmond Station and its future – Site specific Proposal SA 19. My statement focuses on those aspects of the Council's *Plan* which I consider to be insufficiently robust in providing the Council, as local planning authority and the local community with effective control over development affecting the particular architectural, historic interest and significance of Richmond Station as 'a non-designated heritage asset', and the character, appearance and significance of the Central Richmond Conservation Area as 'a designated heritage asset' (in the terms commended in the relevant parts of the *National Planning Policy Framework*). My statement takes account of the formal advice on 'soundness' as explained in paragraph 182 of the *National Planning Policy Framework*.
- I.3 In Section 3 of this Statement, I set out my concerns about the soundness of specific aspects of the *Plan* relating Site-specific Proposal SA 19 - Richmond Station, Richmond. I explain the reasons for my concerns, and put forward my suggestion as to the potential means of addressing the weaknesses of the *Plan* as presently submitted and securing amendment which will contribute to providing a sounder definition of the Proposal insofar as is necessary to ensure that the particular interest and significance of Richmond Station as a non-designated heritage asset and the character, appearance and significance of the Central Richmond Conservation Area as a designated heritage asset will be assured. In setting forward these concerns, I would stress that I see no

objections to the incorporation of wording in the proposal statement referring to the provision of improved public transport interchange facilities on the site or to the potential redevelopment of the various post-war buildings to the immediate north and south of the original station-complex subject to the satisfactory scale and design.

2. THE BACKGROUND TO MY STATEMENT

- 2.1 This statement follows my representations in response to the Council's consultation on the final (publication) version of the *London Borough of Richmond-upon-Thames Local Plan* in relation to Site-specific Proposal SA 19 – Richmond Station, Richmond, submitted to the Council in February, 2017 – see copy attached as Appendix B. This, in turn, followed my formal response to the Council's consultation on *The First Draft of the London Borough of Richmond-upon-Thames Local Plan (Pre-publication version)* in relation to Site-specific Proposal SA 18, submitted to the Council in August, 2016 – see copy attached as Appendix C. A summary of this response was set out, with added comments by Council officers, in the Council's *Summaries of responses received in relation to the Local Plan policies and site allocations and Council's response*, reference 437.
- 2.2 The original frontage building of Richmond Station facing Kew Road containing the generously proportioned, upper concourse together with the circulation areas, platform-buildings and platform-canopies comprise a well-designed and coherent complex of sufficient special architectural and historic interest to merit statutory listing. Completed in 1937 the station complex was designed for the Southern Railway by the company's Architects Department under the direction of James Robb Scott (1882-1965) and connects sensitively to the surviving and very fine, 19th century platform-canopies serving island-platforms 4 and 5 and 6 and 7. The same architectural team designed the almost contemporary, grade II* listed Surbiton Station. Although parts of the station, in particular, the upper concourse, have lost some of their original features and detailing, sufficient original fabric and features remain to make full reinstatement entirely feasible. This would enable the original architectural integrity of the building to be recovered to leave the station in a similar condition as the fully restored listed station at Surbiton.
- 2.3 Having used the Station almost continuously since the early-1960s, together with many other Borough residents and visitors to Richmond, I value the distinctive architectural character and significance of the complex, its efficient layout, and above all, the platforms being day-lit and open to the sky and naturally ventilated.
- 2.4 Any new development spanning across and above some or all of the existing tracks and platforms of the station would not only seriously damage the architectural integrity of the existing station complex but would destroy the amenity presently

enjoyed by the travelling public. In addition and importantly, having been directly and professionally involved at the planning stages of the major development proposals above Victoria Station and Charing Cross Station, approved and implemented during the 1980s; in the development proposals above Fulham Broadway Station, approved and implemented in the 1990s; in the thankfully aborted development proposals above Paddington Station put forward in the 1990s; and, most recently, in the development proposals above the eastern Farringdon Cross-Rail/London Underground Interchange Station on Smithfield, now being implemented, I am entirely familiar with the issues raised by proposals for development above railway stations and of the impact of such developments when approved and implemented. I am also entirely familiar with the operational, logistical and cost challenges involved in seeking to develop above railway running-tracks and platforms, and of the potential need to provide significant commercial and other floor-space in such development in order to justify the additional costs incurred and to achieve a viable and profitable development for the prospective developer and the railway freeholder. Accordingly, in the light of such extensive and diverse experience, I view with particular concern the potentially damaging impact of seeking to span across the running-tracks and platforms at Richmond Station with substantially scaled development, as well as the other implications of redeveloping the station site.

- 2.5 I note that Richmond Station was rightly recommended for statutory listing by the Richmond Society in May, 1976, December, 1988, April, 1989 and 1998. (A copy of three pages of the 40-page report prepared by the Society in 1998 is attached as Appendix D). I am not aware that the case for listing has been addressed by English Heritage or Historic England since then, despite the significant changes to listing criteria since that time. Ironically, had the station complex been listed at this time, then many of the features and details that have been lost or adversely altered in the years since under the terms of 'permitted development' would have survived.
- 2.6 I also note that in July, 1997, English Heritage wrote to the architects for a potential redevelopment scheme for the entire station complex and adjoining sites further to a 'Planning Weekend' public consultation exercise recalling that two of the key principles which enjoyed overall support from those attending were the retention of the existing station frontage building and its effective integration into any new development; and the maintenance of full daylighting down to platform-level across all platforms, possibly within a fully glazed enclosure.
- 2.7 In my response to consultation on the *Draft Local Plan* in August, 2016, I suggested that the site specific proposal needed to be fundamentally reviewed and redrafted to provide for the retention and restoration of the entire Southern Railway station complex as completed in 1937 together with the surviving 19th century platform-canopies serving platforms 4 to 7, and the retention of the daylighting and natural ventilation of all the platforms. I note that in a submission to the Council by The

Twentieth Century Society, the group expressed great concern that the *Draft Local Plan* promoted the Station site for 'comprehensive redevelopment', stating that 'given the architectural and historic importance of the building, as well as its clear townscape value within a conservation area... the draft as it stands runs counter to the guidance of the *NPPF* and to the guidance set out in the *Central Richmond Conservation Area Statement*, which specifically identifies development pressure as a problem, and which promotes the preservation, enhancement and reinstatement of architectural quality', and urged that site-specific proposal SA 18 should be redrafted 'in a way which encourages only conservation-led development which explicitly safeguards the retention and restoration of the 1937 station building'.

3. MY PARTICULAR CONCERNS

- 3.1 Whilst the addition of references to the location of the Station within a conservation area and to its designation as a *Building of Townscape Merit* in the relevant section of the Council's final (publication) version of the *Local Plan* is to be welcomed, no justification whatsoever is provided for the Council's assertion that 'the Station is a key development site' and that 'there is a need for comprehensive redevelopment' in order to deliver transport interchange improvement.
- 3.2 Importantly, the Council has failed to provide any assessment of the potential impact on the retail and business health of the remainder of the Town, on the amenity of its residents and visitors, and on the viability of existing cinemas in the Town that would result from providing 'approximately 10 000 square metres of retail floor-space', 'substantial provision of employment floor-space, particularly BI offices', 'other uses, such as for community, leisure and entertainment' and 'housing in (sic) upper floors'. Similarly, the Council has failed to provide any assessment of the potentially damaging impact on the character and appearance of the conservation area and on traffic movement and car-parking in the Town that would result from the essential servicing requirements of such a vast multi-use development. Such omissions render the proposal as presently worded entirely unsound and unsustainable and in fundamental conflict with other policies of the Local Plan.
- 3.3 The statement that 'any redevelopment (sic) proposal must be of the highest quality in character and respond positively to the Conservation Area' is entirely inadequate in setting the necessary parameters for development of the site' given the failure to refer to the need to provide for the retention and restoration of the entire Southern Railway station complex as completed in 1937 together with the surviving 19th century platform-canopies serving platforms 4 to 7, and the retention of the daylighting and natural ventilation of all the platforms, and the need to ensure that any new development should either preserve or enhance the character and appearance of the conservation area and sustain its significance.

- 3.4 Finally and importantly, as presently drafted, there is a failure to distinguish between the purpose-built railway station, which is clearly of particular architectural, historic and townscape significance and contributes to the particular character, appearance and significance of the Central Richmond Conservation Area, and the later, post-War, commercial buildings fronting The Quadrant and the Kew Road to each side of the main Station frontage (Westminster House and the shops below to the immediate north and Gateway House and the adjacent shops to the immediate south) and the multi-storey car-park on the southern side of the station complex, accessed from Drummond's Place, none of which possess any such significance and none of which contribute to the character, appearance or significance of the conservation area.
- 3.5 As presently drafted, the proposal reflects an alarming lack of recognition and understanding by the Council of the particular challenges and implications of designing, funding and delivering new development above railway running-tracks and platforms, and of the distinctive architectural and townscape interest and significance of the existing station-complex.
- 3.6 In the interests of clarity and consistency with the conservation and other relevant policies contained in the *National Planning Policy Framework*, the *London Plan*, and the emerging *Local Plan* and the need for a sound and sustainable statement of planning and conservation policy, I urge the Inspector to require the Council to fundamentally review and re-draft the existing the site-specific proposal, to take account of the key issues referred to above.

4. ADDITIONAL NOTE

- 4.1 I remain entirely willing to provide copies to the Inspector of any details about the history and development of the station and to clarify any of the issues I have raised in this submission. In addition, I would wish to encourage the Inspector to undertake a site inspection of the Station and its immediate setting in order to appreciate its considerable architectural and historic interest and significance as anon-designated heritage asset, and to recognise the need to ensure that sound policies are in place to ensure that such interest and significance will be effectively sustained in accordance with the relevant policies of the *National Planning Policy Framework*.
- 4.2 Finally, I would confirm that I recognise that the station was the subject of a Planning Brief drafted and adopted by the Council in March, 2002 and Site Specific Proposal R 6 in earlier local plans. However, I would observe that these contained significant and fundamental deficiencies similar to those contained in the emerging Local Plan.

Paul Velluet

7th September, 2017.

APPENDIX A – PAUL VELLUET, QUALIFICATIONS AND EXPERIENCE

Paul Velluet is a chartered architect - a member of both the RIBA and the Institute of Historic Building Conservation - with experience drawn from over thirty-five years working in both private practice and the public sector specialising in building conservation and development in historic areas. He holds B.A. Honours, B. Arch. Honours and Master of Letters degrees from the University of Newcastle-upon-Tyne.

Since 2005, he has headed an independent consultancy specialising in the provision of professional and technical advice to property owners, prospective developers and other planning and building professionals on projects involving new development in historic areas and the conservation, alteration and extension of historic buildings, particularly at the critical pre-planning and planning stages. The consultancy undertakes work for commercial, educational, residential, cultural, diplomatic, church, health-sector, hospitality-sector, urban and rural-estate and local planning authority clients, including the City of London Corporation and the City of Westminster Council. Clients have also included historic building trusts and local amenity and community groups in addition to the historic London estates.

Paul Velluet's professional experience includes working as a project architect with architects Manning Clamp + Partners, Richmond, Surrey, 1972-1975; as a Principal Urban and Design and Conservation Officer in Westminster City Council's Department of Planning and Transportation, 1976-1991; as Regional Architect and Assistant Regional Director, English Heritage London Region, 1991-2004; and as Senior Associate, Conservation and Planning, with the major Central London commercial practice HOK Architects, 2005-2011. During these years, he has been professionally responsible for projects which have been recognised with a *European Architectural Heritage Year (Civic Trust) Award*, a *Commendation under the R.I.B.A. Awards*, and awards and commendations under local awards schemes in south-west London. He has also been an exhibitor in the Architecture Room of the Royal Academy of Arts Annual Summer Exhibitions.

Currently he serves as a member of the RIBA's Awards Group; a member of the Archdiocese of Westminster Historic Churches Committee; and a member of the Guildford Cathedral Fabric Advisory Committee. In past years he has served on the Executive Committee of the Society of Architectural Historians of Great Britain, the RIBA's Planning Group, the Royal Fine Art Commission's Thames Landscape Strategy Panel, the Cathedrals Fabric Commission for England, the Cathedrals Fabric Commission's Technical Group, and the Richmond Society's Executive Committee. For twenty years he served as a Trustee of the Covent Garden Area Trust, and for five years as an assessor for the RIBA/Crown Estate's Annual Conservation Awards.

He has been a contributor to various publications, journals and guidance including: *Context: New buildings in historic settings* (The Architectural Press, 1998); *The Buildings of England, London 2: South* (1983), and *The Buildings of London, London 6: Westminster* (2003); *The Architects' Journal*, *Planning in London*, *Urban Design Quarterly*, *English Heritage's Conservation Bulletin*, *Church Building* and *Ecclesiology Today*; and diverse policy and guidance documents for Westminster City Council and English Heritage.

APPENDIX B

CONSULTATION ON THE FINAL VERSION OF THE LONDON BOROUGH OF RICHMOND-UPON-THAMES LOCAL PLAN (PUBLICATION)

REPRESENTATION BY PAUL VELLUET, CHARTERED ARCHITECT, IN RELATION TO SITE-SPECIFIC PROPOSAL SA 19 - RICHMOND STATION, RICHMOND

FEBRUARY, 2017

This representation follows my formal response to consultation on *The First Draft of the London Borough of Richmond-upon-Thames Local Plan (Pre-publication version)* in relation to Site-specific proposal SA 19 – Richmond Station, Richmond, submitted in August, 2016. A summary of my response is set out in the Council's *Summaries of responses received in relation to the Local Plan policies and site allocations and Council's response*, reference 437.

This representation takes account of the formal advice on 'soundness' as explained in paragraph 182 of the *National Planning Policy Framework*.

In my response to consultation on the *Draft Local Plan* last August, I stated:

'The original frontage building of the Station facing Kew Road containing the generously proportioned upper concourse together with the circulation areas, platform-buildings and platform-canopies comprise a well-designed and coherent complex of sufficient special architectural and historic interest to merit statutory listing. Completed in 1937 the station complex was designed for the Southern Railway by the company's Architects Department under the direction of James Robb Scott (1882-1965) and connects sensitively to the surviving and very fine, 19th century platform-canopies serving island-platforms 4 and 5 and 6 and 7. The same architectural team designed the almost contemporary, grade II* listed Surbiton Station.

Having used the Station almost continuously since the early-1960s, together with many other Borough residents and visitors to Richmond, I value the distinctive architectural character and significance of the complex, its efficient layout, and above all, the platforms being day-lit and open to the sky and naturally ventilated. Any development taken across and above some or all of the existing tracks and platforms would not only seriously damage the architectural integrity of the existing station complex but would destroy the amenity presently enjoyed by the travelling public. Accordingly, the proposal as presently envisaged under SA 18 is not only totally unacceptable, but runs against the relevant policies contained in the *National Planning Policy Framework* and the Council's existing and emerging conservation and other policies.

I should add the Station was rightly recommended for statutory listing by The Richmond Society in May, 1976 and again in December, 1988 and April, 1989. I am not aware that the case for listing has been addressed by English Heritage or Historic England since then. In July, 1997, English Heritage wrote to the architects for a potential redevelopment scheme for the entire station complex and adjoining sites in further to a 'Planning Weekend' public

consultation exercise recalling that two of the key principles which enjoyed overall support from those attending were the retention of the existing station frontage building and its effective integration into new development; and the maintenance of full daylighting down to platform-level across all platforms, possibly within a fully glazed enclosure.

In my response to consultation on the *Draft Local Plan* last August, I suggested that the project needed to be fundamentally reviewed and redrafted to provide for the retention and restoration of the entire Southern Railway station complex as completed in 1937 together with the surviving 19th century platform-canopies serving platforms 4 to 7, and the retention of the daylighting and natural ventilation of all the platforms. I note that in a submission to the Council by The Twentieth Century Society, it expressed great concern that the *Draft Local Plan* promoted the Station site for 'comprehensive redevelopment', stating that 'given the architectural and historic importance of the building, as well as its clear townscape value within a conservation area... the draft as it stands runs counter to the guidance of the *NPPF* and to the guidance set out in the *Central Richmond Conservation Area Statement*, which specifically identifies development pressure as a problem, and which promotes the preservation, enhancement and reinstatement of architectural quality', and urged at site-specific proposal SA 18 should be redrafted 'in a way which encourages only conservation-led development which explicitly safeguards the retention and restoration of the 1937 station building'.

Whilst the addition of references to the location of the Station within a conservation area and to its designation as a *Building of Townscape Merit* is to be welcomed, no justification whatsoever is provided for the Council's assertion that 'the Station is a key development site' and that 'there is a need for comprehensive redevelopment' in order to deliver transport interchange improvement. The Council has not provided any assessment of the potential impact on the retail and business health of the remainder of the Town, on the amenity of its residents and visitors, and on the viability of existing cinemas in the Town that would result from providing 'approximately 10 000 square metres of retail floor-space', 'substantial provision of employment floor-space, particularly BI offices', 'other uses, such as for community, leisure and entertainment' and 'housing in (sic) upper floors'. Similarly, the Council has not provided any assessment of the potentially damaging impact on the character and appearance of the conservation area and on traffic movement and car-parking in the Town that would result from the essential servicing requirements of such a vast multi-use development. Such omissions render the proposal as presently worded entirely unsound and unsustainable.

The statement that 'any redevelopment (sic) proposal must be of the highest quality in character and respond positively to the Conservation Area' is entirely inadequate in setting the necessary parameters for development of the site' given the failure to refer to the need to provide for the retention and restoration of the entire Southern Railway station complex as completed in 1937 together with the surviving 19th century platform-canopies serving platforms 4 to 7, and the retention of the daylighting and natural ventilation of all the

platforms, and the need to ensure that any new development should either preserve or enhance the character and appearance of the conservation area and sustain its significance.

Finally and importantly, as presently drafted, there is a failure to distinguish between the purpose-built railway station, which is clearly of particular architectural, historic and townscape significance, and the later, post-War commercial buildings fronting The Quadrant and the Kew Road to each side of the main Station frontage and the multi-storey car-park on the southern side of the station complex which possess no such significance.

In the interests of clarity and consistency with the conservation and other relevant policies in the *National Planning Policy Framework*, the *London Plan*, and the emerging *Local Plan* and the need for a sound and sustainable statement of planning and conservation policy, the existing the site-specific proposal needs to be fundamentally reviewed and redrafted.

Paul Velluet

15th February, 2017.

PAUL VELLUET, M.Litt., RIBA, IHBC, CHARTERED ARCHITECT



APPENDIX C

LONDON BOROUGH OF RICHMOND-UPON-THAMES DRAFT LOCAL PLAN: PRE-PUBLICATION VERSION FOR CONSULTATION

A RESPONSE FROM PAUL VELLUET, CHARTERED ARCHITECT AND RESIDENT OF ST MARGARET'S

SITE ALLOCATIONS – SA 18 RICHMOND STATION, RICHMOND

AUGUST, 2016

I write as a locally-based architect, a resident of the Borough since 1948 and as a former Chairman of The Richmond Society. I am a member of the RIBA's Awards Group, a former Assistant Director of English Heritage London Region and a former member of the Richmond-upon-Thames Council's Conservation Areas Advisory Committee.

I wish to raise fundamental objections to proposal SA 18 as presently drafted.

The original frontage building of the Station facing Kew Road containing the generously proportioned upper concourse together with the circulation areas, platform-buildings and platform-canopies comprise a well-designed and coherent complex of sufficient special architectural and historic interest to merit statutory listing. Completed in 1937 the station complex was designed for the Southern Railway by the company's Architects Department under the direction of James Robb Scott (1882-1965) and connects sensitively to the surviving and very fine, 19th century platform-canopies serving island-platforms 4 and 5 and 6 and 7. The same architectural team designed the almost contemporary, grade II* listed Surbiton Station.

Having used the Station almost continuously since the early-1960s, together with many other Borough residents and visitors to Richmond, I value the distinctive architectural character and significance of the complex, its efficient layout, and above all, the platforms being day-lit and open to the sky and naturally ventilated. Any development taken across and above some or all of the existing tracks and platforms would not only seriously damage the architectural integrity of the existing station complex but would destroy the amenity presently enjoyed by the travelling public. Accordingly, the proposal as presently envisaged under SA 18 is not only totally unacceptable, but runs against the relevant policies contained in the *National Planning Policy Framework* and the Council's existing and emerging conservation and other policies.

The project needs to be fundamentally reviewed and redrafted to provide for the retention and restoration of the entire Southern Railway station complex as completed in 1937 together with the surviving 19th century platform-canopies serving platforms 4 to 7, and the retention of the daylighting and natural ventilation of all the platforms.

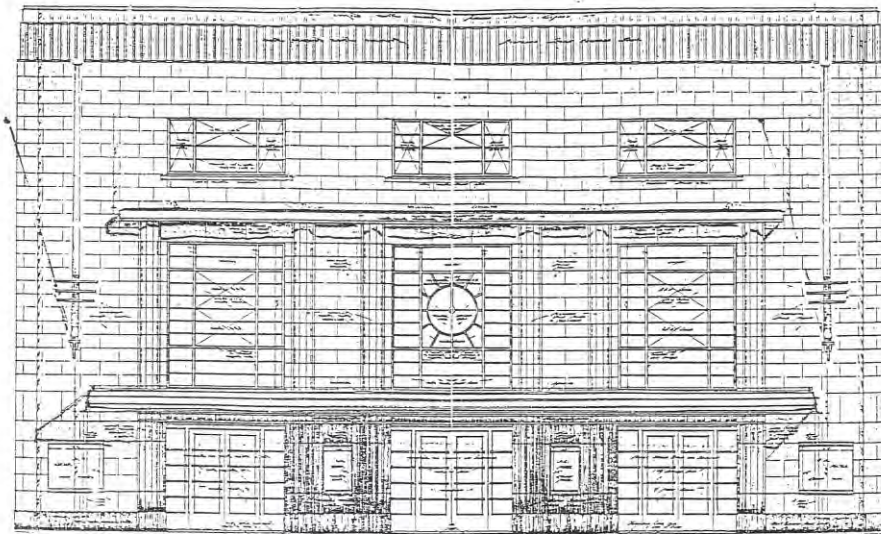
Paul Velluet, M.Litt., RIBA, IHBC, Chartered Architect



APPENDIX D – PAGES FROM THE RICHMOND SOCIETY'S 1998 REPORT

Rec.
21.V.01

RICHMOND STATION
Southern Railways 1937



Extract from working drawing for Richmond Station

An Illustrated Architectural and Historical View of the station
prepared in 1998 by



THE RICHMOND SOCIETY

The objectives of this report are:

To provide a brief history of the station and to illustrate the details of architectural interest in the building.

The report compares the station with other railway examples designed and constructed between the wars (1918 - 1939)

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The report is illustrated with photographs and key drawings as follows;

Extract from the Ordnance Survey map dated 1933
Plan of Station dated 1936
Elevations and Sections extracted from the original drawings
Notes and Photographs from The Builder and
The National Railway Museum Archive.

Introduction to the Report

This report has been prepared by the Richmond Society as a factual historical and architectural appraisal of Richmond Station. It has been made as comprehensive as possible by reference both to direct archival material and to the wider context of other contemporary examples which influenced its design.

The instigation of this study has been prompted by the scheme proposals from Railtrack PLC and their first appointed partnership developer to redevelop the whole of the Station's five hectare site. The nub of Railtrack's initial invitation brief to developers was that an improved station environment and integrated transport interchange were to be supported by a major commercial, retail and office development.

As regards the existing station buildings, it appears from the outset that their retention was not envisaged. The brief from Railtrack stated that the provision of a new station concourse including station retail, ticket and travel office would be a "likely" element of the targeted major development scheme.

The plan subsequently prepared by the Trevor Osborne Group indeed adopted a "clean sweep" approach. Any suggestions that (e.g.) the Booking Hall entrance building might be considered for incorporation in a redevelopment were flatly turned down.

The Richmond Society believes evaluation of the existing buildings to be an essential factor in any consideration of plans for the Station site and that this has not been done. The purpose of this report is to remedy this omission and provide to all concerned with the context of present or future schemes for the site, a factual account of the historical and architectural development of the station buildings. An appreciation of the worth and significance of the station is, we believe, essential to recommendations for its future.

Respondent 30 - Jon Rowles on behalf of OBO Friends of Heathfield Recreation Ground and Environs

In relation to Question 11 - In addition to our existing approaches of directing larger scale development to the borough's town centres, and expecting the majority of development on brownfield sites, where should we direct new growth in the borough?



In relation to Question 17 Can you suggest any other ways we could accommodate future growth and new development, ensuring support for sustainable communities?



Result of lack of bin storage for new flats; squalor.
Location: Bridge Way entrance to service road to Whitton High Street

In relation to Q 28 - What other ways could help deliver more affordable housing, in the right locations, given land values and property prices in the borough, and recognise the wider community benefits it brings?



Red Box shows where empty loft space could be converted into new units. This example is Andover Road in Twickenham.

In relation to Question 77 - Do you have any other suggestions on how planning can promote or contribute to creating places and an environment that is conducive to weight loss and active lifestyles?



Arden Close in Whitton – and example of lack of pavements discouraging exercise

All responses received to the Call for Sites

https://www.richmond.gov.uk/services/planning/planning_policy/local_plan/new_local_plan_direction_of_travel_engagement
<https://haveyoursay.citizenspace.com/richmondecs/call-20/>



Consultation from 24 February until 5 April 2020

Published by LBRuT November 2020

Please note, the responses below are exactly as received from the respondents and have not been edited by the Council.

They are not alphabetically ordered or in any other order of priority.

The schedule shows where any personal information within responses relating to contact details, particularly full address data, has been removed stating e.g. *[personal details removed for data protection]* or shown as black rectangles in the appendices.

Appendices have been made available separately where due to the length or nature of responses they could not be captured within the main Schedule. The officer references added are shown in the Schedule as *[See Appendix....]*

Respondent reference no.	Name / Organisation
2.	CBRE on behalf of LGC Teddington
3.	Katie Parsons, Historic England
8.	Sharon Jenkins, Natural England
11.	Surrey County Council
13.	Heather Archer, Highways England
19.	DP9 Ltd on behalf of London Square Developments
21.	Lucy Wakelin, Transport for London Commercial Development
22.	Jimmy Wallace, Richmond Athletic Association
24.	Paul Velluet
26.	Hannah Lukacs
31.	Tim Catchpole on behalf of the Mortlake with East Sheen Society
33.	Tim Catchpole on behalf of the Mortlake Brewery Community Group
34.	DP9 Ltd on behalf of Harlequin Football Club Limited
35.	Alice Roberts, CPRE London
46.	Joan Gibson
55.	Jon Rowles
72.	Andrew Weeks

Respondent reference no.	Name / Organisation
73.	Pegasus Group on behalf of Sheen Lane Developments
74.	Savills on behalf of Thames Water
75 (a) and (b)	David Taylor
76.	Henry Clive
77	Jennifer Farrell and Batu Lortkipanidze
78.	Graham Green
79.	Max Hampton
80.	Lira Cabatbat
81.	Dawn Roads
82.	Campbell Brown
83.	Chris O'Rourke
84.	Natasha Waithe
85.	Malcolm Hay
86.	Hester Huttenbach
87.	Clarissa Louise Angus
88.	Defence Infrastructure Organisation on behalf of the Ministry of Defence

Table 1: All respondents to the engagement

Detailed comments as received:

Respondent ref. no.	Name / Organisation	Detailed comments
2.	CBRE on behalf of LGC Teddington	<p>We write on behalf of our client LGC Ltd. (hereafter referred to as 'LGC') in response to consultation on the Local Plan Direction of Travel Document and Call for Sites.</p> <p>LGC is the UK National Measurement Laboratory and Designated Institute for chemical and biomeasurement. It has also been home to the UK Government Chemist function for more than 100 years. The company's headquarters is located on Queens Road in Teddington (hereafter referred to as 'the site'). A site plan is enclosed (see Appendix 1).</p> <p>On behalf of our client, we write to revive and reinforce our previous advocacy for redevelopment of the site for a mix of employment and residential uses. Over three years have now passed since our last correspondence on this matter and the importance of bringing forward enabling development on part of the site has never been more crucial.</p> <p>This consultation response follows previous representations submitted to London Borough Richmond upon Thames (LBRuT) on behalf of LGC, in respect of the now adopted Local Plan (July 2018 and March 2020). Previous representations presented to the Council on behalf of LGC were dated 15th February 2017, 18th August 2016 and 28th January 2016. These representations supported a mixed-use allocation at the site, most importantly for a modern, fit-for-purpose headquarters premises, alongside much needed housing, including affordable housing.</p> <p>Since the submission of our previous representations, LGC existing facilities in Teddington have become increasingly unsustainable, obsolete and outmoded. In part, this is due to far reaching changes to customer requirements and continuing evolution and miniaturisation of scientific techniques.</p> <p>Due to the original design and construction methods used, the building has a significantly higher operating cost than any other UK LGC site. In addition, the mechanical and electrical equipment (plant) that had already reached the end of its sustainable lifespan at the time of our previous representations, has now continued to operate for an additional three years. It is evident that the buildings are wholly unsustainable into the medium term. Further, increasingly high operating costs and inefficiencies are in large part due to the facility originally being designed and built for wet chemistry laboratory operations. Over time, substantial changes to scientific methods are evident, particularly with the introduction of instrument based analytical methods (e.g. liquid & gas chromatography and mass spectrometry etc). The site in its current form is now fundamentally constraining LGC's operating model in Teddington, contrary to facilitating the delivery of the LGC's wider business objectives and crucial national and global roles in measurement science.</p> <p>The site remains an important facility to LGC with its skilled local workforce. It is LGC's intention to retain the site as its group headquarters and part of its UK laboratory operations. However, the cost of upgrading the facilities is extremely high and a large portion of the site is surplus to LGC requirements.</p>

Respondent ref. no.	Name / Organisation	Detailed comments
		<p>The adopted Local Plan clearly sets out the Council’s broad support for LGC. As stated in paragraph 10.1.4 of the adopted Local Plan – “The borough is home to nationally important scientific institutions such as... the head office of the Laboratory of the Government Chemist (LGC). Scientific, innovation and research, provision of incubator units and laboratories will be supported.”</p> <p>A land-use allocation for mixed-use enabling development would go much further than simply providing a new, high-quality, fit-for-purpose facility to sustain LGC in the borough into the long-term. The site is currently under-developed, under-used and under-occupied. The effective use of this sustainable brownfield site would be assured through the development of a significant quantum of new Grade A office space, separate to that developed for LGC’s new headquarters building. New, much needed employment floorspace would serve to provide accommodation for a range of occupiers including start-ups and expanding/relocating businesses within LBRuT. Enabling development as part of the site through the building of new homes must also form part of any mixed-use allocation. New homes would not only serve to subsidise quality new commercial development on site, but also provide an appropriate means of delivering much needed homes and affordable homes for the borough.</p> <p>Housing and Employment Policy:</p> <p>The adopted Local Plan currently protects the site for employment use through its designation as ‘Locally Important Industrial Land and Business Parks’. We respectfully urge the Council to explore with LGC how the existing net employment floorspace can be successfully re-provided on site, whilst also allowing for the delivery of a substantial number of new homes for the borough. The critical matter of housing land supply and delivery of homes is explored further below.</p> <p>Notwithstanding Policy LP40 (1) of the adopted Local Plan seeks the broad protection of employment land, stating “land in employment use should be retained in employment use for business, industrial or storage purposes”, the policy continues by making an allowance under exceptional circumstances for mixed-use redevelopment. Policy LP40 (4) states “mixed use development proposals which come forward for specific employment sites should retain, and where possible enhance, the level of existing employment floorspace”.</p> <p>The supportive context of Policy LP40 for mixed-use redevelopment is reflected at national policy level. The National Planning Policy Framework (NPPF) actively seeks to promote effective use of land. Paragraph 118 directs that planning policies and decisions should encourage multiple benefits from both urban and rural land, including through mixed use schemes; give substantial weight to the value of using suitable brownfield land within settlements; and promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively. A mixed-use allocation would truly serve to optimise the use of this highly sustainable brownfield site.</p> <p>Policy LP34 states a borough target of 3,150 homes for the period 2015-2025, equating to 315 per annum. Crucially, the Council commits to exceeding this minimum strategic dwelling requirement, where this can be achieved in accordance with other Local Plan policies.</p> <p>The London Plan – Intend to Publish (ItP) version (December 2019) should be offered substantial weight given it is now in the final stages of preparation, where it has not been challenged by the Secretary of State. The London Plan ItP version provides for an increased housing</p>

Respondent ref. no.	Name / Organisation	Detailed comments
		<p>land supply requirement for LBRuT of 4,110 over a 10-year period, or 411 units per annum. This represents an increase of 960 units over a 10-year period. At a strategic level, the London-wide Strategic Housing Market Assessment (SHMA) has identified a need for 66,000 additional homes across London per annum.</p> <p>Borough's should be identifying and seeking to enable additional development capacity to supplement targets, thereby realising the true potential of brownfield housing capacity. The London Plan ItP version makes it clear that making the best use of land means directing growth towards the most accessible and well-connected places. Intensification of existing places will be required, including in outer London. Policy GG2c specifically directs the proactive exploration of potential to intensify the use of land to support additional homes and workspaces. This would involve the promotion of higher density development, particularly in locations that are well-connected to jobs, services, infrastructure and amenities by public transport, walking and cycling.</p> <p>Crucially, the very recent (13 March 2020) written response prepared by Secretary of State for Housing, Communities and Local Government to the Mayor of London in respect of the Intention to Publish version of the London Plan, was deeply critical of the response to housing delivery and affordability. The Secretary of State was clear that the approach for the ItP version of the London Plan was "inconsistent with the predevelopment stance we should be taking" and "the necessary decisions to bring more land into the planning system had not been taken". In addition, the Secretary of State reinforced that the "plan must be brought to the minimum level [he] would expect to deliver homes to start serving Londoners in the way they deserve" specifying that site density must be optimised, and development is brought forward to maximise site capacity. Finally, Rt Hon Robert Jenrick MP, in respect of future housing delivery in London, goes on to advise the Mayor of London to make a commitment to "maximise delivery in London, including through taking proactive steps to surpass the housing requirement in [the] plan".</p> <p>At the local level, the LBRuT Local Plan Housing Annual Monitoring Report 2018/19 (13 September 2019) serves to report on the borough's performance in respect of housing land delivery. The AMR states that the Borough performed well in 2018/19 overseeing the completion of 419 dwellings. However, if the average annual housing completions are taken over the 10-year period from 1st April 2009 through to 31st March 2019, it is evident that at 374 units per annum, the number would be insufficient to meet the proposed 411-unit target as stated in the London Plan ItP version.</p> <p>As such, a 5-year housing land supply could not be demonstrated, especially when including an additional buffer of 5% to ensure choice and competition in the market for land, as required by the NPPF. Taking the average annual delivery over the past 10 years and applying that across a 5-year period would equate to 1,869 dwellings, falling short of the London Plan ItP target of 2,055 completions across a 5-year period. When adding a 5% buffer this 5-year housing land supply target increases to 2,158 across a 5-year period.</p> <p>Notwithstanding the above, the reality of the evidence as presented in the Council's AMR 2018-19 represents far more of a challenge. Table 4 of the 2018/19 AMR details the sources of the current 5-year housing land supply. The Council has identified a potential 1,474 units over the 5-year period, 684 units short of the London Plan ItP target plus 5% buffer.</p>

Respondent ref. no.	Name / Organisation	Detailed comments
		<p>Policy H1 of the London Plan ItP version clearly states that boroughs should prepare delivery focused Development Plans which allocate an appropriate range and number of sites that are suitable for residential and mixed-use development and intensification.</p> <p>Crucially, given the mixed-use nature of LGC's proposal, the London Plan ItP version continues by encouraging the intensification and effective use of land through Policy E1. Policy E1(A) supports improvements to the quality, flexibility and adaptability of office space through new office provision, refurbishment and mixed-use development.</p> <p>In our strong view, the site lends itself well to a mix of employment and residential uses. The site can provide for a comprehensively masterplanned sustainable mixed-use development that retains LGC in the borough, provides new employment space for new, expanding and relocating businesses and delivers much need homes. Importantly, it is clear from the recent under-delivery of affordable housing that the site could serve as a productive and effective contributor to the Council's affordable housing land supply over the forthcoming plan period. It is considered that practical aspects such as car parking and site security can be comprehensively addressed and there is no barrier to delivering a mixed-use scheme in accordance with the National Planning Policy Framework.</p> <p>A new, fit-for-purpose building that meets the current and future needs of this modern, high-technology, knowledge-based employer is vital. LGC attracts highly skilled employees in the life sciences sector. It is broadly accepted that a borough's 'stock' of high skilled workers is one of the key determinants of its economic performance. Thriving local economies require a local workforce with high levels of employability. It should be that employment and skills are drivers of local economic growth. A motivated, flexible, and skilled workforce attracts employers and boosts productivity.</p> <p>Aside from the demonstrable economic benefits there are also a broad number of social and demographic benefits. Indeed, without opportunities for skilled work, the local authority will risk an ageing workforce as young people will ultimately relocate from such an area in search of higher skilled work, training and other benefits elsewhere.</p> <p>It is evident that LGC contribute economically to LBRuT, however, it is not solely the economic value that is important, but also the global reputation of scientific excellence that it provides within the life sciences sector, which is directly associated with Teddington.</p> <p>There is a compelling case for enabling development in this instance, whereby LGC can continue to reside and operate its headquarters from the borough for many years to come, retaining highly skilled employees within a renowned and growing business of both national and global significance.</p> <p>In summary, a proportion of the site is surplus to LGC requirements, whilst the headquarters facility requires substantial modernisation including redevelopment. A sustainable mixed-use allocation including for both employment and residential use would be both suitable and appropriate enabling development, allowing LGC to have a continuing presence in Teddington for the long term. Any mixed-use development proposal for the site would actively seek to make effective use of land, re-providing net existing employment floorspace whilst providing for significant housing delivery, including much needed affordable housing.</p>

Respondent ref. no.	Name / Organisation	Detailed comments
		<p>We would be grateful if you could confirm receipt of this letter and confirm that these representations will be duly considered when assessing the strategic direction of the forthcoming local plan. Given the importance of this matter we would welcome a meeting with officers to discuss this proposal in more detail.</p> <p>The Council's support would be strongly welcomed, helping to secure LGC within the borough whilst simultaneously protecting Teddington's rich scientific heritage long into the future.</p> <p><i>[See Appendix for site plan]</i></p>
3.	Katie Parsons, Historic England	<p><u>Call for Sites</u> Historic England has no sites to put forward for consideration. We would however like to draw your attention to the need to consider the historic environment at this stage of the plan making process. Heritage assets and their setting should be included within the assessment of sites which are submitted for consideration as part of the Local Plan process and other planning policy work and, should also consider the impact of sites on heritage assets in adjoining local authority areas.</p> <p>We advocate a wide definition of the historic environment which includes not only those areas and buildings with statutory designated protection but also those which are locally valued and important, as well as the landscape and townscape components of the historic environment. The importance and extent of below ground archaeology is often unknown, although information in the Historic Environment Record (HER) will indicate areas of known interest, or high potential where further assessment is required before decisions or allocations are made.</p> <p><u>Assessing Sites</u> Our advice note 3 on site allocations in local plans (see link below) sets out a suggested approach to assessing sites and their impact on heritage assets. It advocates a number of steps, including understanding what contribution a site, in its current form, makes to the significance of the heritage asset/s, and identifying what impact the allocation might have on significance. This could be applied to the assessment and selecting of sites within a plan.</p> <p>In assessing sites it is important to identify those sites which are appropriate for development and also to assess the potential capacity of the site in the light of any historic environment (and other) factors. This should be more than a distance based criteria but rather a more holistic process which seeks to understand their significance and value. Whilst a useful starting point, a focus on distance or visibility alone as a gauge is not appropriate.</p> <p>All potential sites will need to be appraised against potential historic environment impacts. It is imperative to have this robust evidence in place to ensure the soundness of the Plan. We recommend that the appraisal approach should avoid merely limiting assessment of impact on a heritage asset to its distance from, or inter-visibility with, a potential site. Site allocations which include a heritage asset (for example a site within a Conservation Area) may offer opportunities for enhancement and tackling heritage at risk, while conversely, an allocation at a considerable distance away from a heritage asset may cause harm to its significance, rendering the site unsuitable. Cumulative effects of site options on the historic environment should be considered too.</p>


Respondent ref. no.	Name / Organisation	Detailed comments
		<p>The following broad steps might be of assistance in terms of assessing sites:</p> <ul style="list-style-type: none"> • Identify the heritage assets on or within the vicinity of the potential site allocation at an appropriate scale. • Assess the contribution of the site to the significance of heritage assets on or within its vicinity • Identify the potential impacts of development upon the significance of heritage asset • Consider how any harm might be removed or reduced, including reasonable alternatives sites • Consider how any enhancements could be achieve and maximised • Consider and set out the public benefits where harm cannot be removed or reduced <p>If a site is allocated, we would expect to see reference in the policy and supporting text to the need to conserve and seek opportunities to enhance the on-site or nearby heritage assets and their setting, the need for high quality design and any other factors relevant to the historic environment and the site in question. Site allocations which include a heritage asset (for example a site within a Conservation Area) may offer opportunities for enhancement and tackling heritage at risk.</p>
8.	Sharon Jenkins, Natural England	<p>Thank you for your consultation request on the above Strategic Planning Consultation, dated 24th February, 2020. Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development. Natural England have no comments to make on this consultation.</p>
11.	Surrey County Council	<p>Thank you for consulting Surrey County Council s the Minerals and Waste Planning Policy team and Spatial Planning team on the Local Plan Direction of Travel consultation and Call for sites. We do not have any specific comments to make on this consultation, but please keep us informed of any future consultations.</p>
13.	Heather Archer, Highways England	<p>Your consultation is also asking for land to be identified for development. The Secretary of State for Transport does own and manage land within some areas of District Councils and a list of land available for sale is publicly available as identified below. Please therefore be advised that land that has been identified, that is already available for sale can be found on My Government Space website using the following link: https://www.gov.uk/find-government-property</p>
19.	DP9 Ltd on behalf of London Square Developments	<p>Call for Sites – Site allocation</p> <p>It is put forward that the Site is allocated within the new Local Plan for residential development on the basis that this is an appropriate brownfield site for this use. The site is immediately available for development and is located within a residential area. The requirement to re-provide the employment floorspace should not be included in this instance due to the site constraints and accessibility as outlined in detail above that make the site inappropriate for continued employment useA site plan is submitted denoting the proposed site allocation and ownership in red.</p> <p><i>Continued Employment Use</i></p> <p>There are significant Site constraints associated with the Site within the residential area which make it inappropriate for continued commercial use. The Site constraints are well documented within the London Borough of Richmond Employment Sites and Premises Study (2017) which identifies that “The site is bounded by residential uses. Crane Road is primarily residential road which means that operating hours, types of industrial activity and access are constrained. The current use experiences issues with HGV access”. The Site is identified as</p>

Respondent ref. no.	Name / Organisation	Detailed comments
		<p>having poor compatibility with surrounding neighbours and poor access via residential roads with resident's parking on both sides. Furthermore, The LBRuT Employment Sites and Premises Study (2017) sets out that <i>"The departure of Greggs presents an opportunity to redevelop a large site. However, the layout and location of the site has a number of constraints including access, hours of operation and the types of industrial activity permitted limiting the amount of employment floorspace that could be delivered. Redevelopment of the site would realistically be through a mixed use scheme. The northern part of the site, fronting the River Crane, is the most suitable area for employment use."</i></p> <p>It was noted by Officers that the Peter Brett Associates Report (2017) was produced before the GLA undertook a revision of the industrial land release benchmark. As such the draft London Plan sought to retain industrial capacity within the London Borough of Richmond, however as outlined above, the SoS has found this approach unsound. The Site was therefore protected in line with the London Plan aspirations on the basis that all employment Sites should be retained disregarding the evidenced site constraints that make the Site inappropriate for continued employment use.</p> <p>As identified by LBRuT, the use of the Site by Greggs as a bakery generated a significant level of daily HGV movement on the local highway. The streets surrounding the Site are narrow residential streets and are often heavily parked on both sides. The presence of HGVs on the residential street resulted in severe highways impacts including damage to parked cars. There is also evidence of damage to footways and kerbs where HGVs have had to mount the pavement. This also presents a safety risk for other road users and pedestrians. Local complaints of noise and poor air quality as a result of the presence of HGVs accessing the Site have also been reported. Greggs Bakery benefits from an unrestricted consent, meaning deliveries and servicing to and from the Site took place throughout the day including early in the morning and late in the evening.</p> <p>As demonstrated in the Site's planning history, there have been a number of attempts to ameliorate the noise amenity impacts of the bakery operation on the neighbours over the years. Specifically, an application (ref. 08/3145/FUL) was approved in November 2008 for the installation of a noise barrier to the rear of 20-22 Crane Road. The officer report for this application identified that the benefits of the proposed barrier were not <i>"limited to the activities around the waste storage but beyond this area where there is a high degree of noise and disruption from vehicular movements from Greggs and other delivery vehicles, noise and chatter amongst workers and rivers and other such activities within the site."</i></p> <p>A prior application (ref. 85/1756) for <i>"The erection of noise baffle sidewall sheeting and roof to covered van closing area together with screen"</i> was approved on 13th February 1986. This demonstrates the longstanding incompatibility issues associated with the use of the Site as a bakery in close proximity to residential dwellings. Despite the careful management of the bakery by Greggs and the acoustic measures implemented, the uses were not considered to be neighbourly uses and contributed to the vacation of the Site by Greggs to relocate to a purpose-built facility in a more accessible and appropriate location.</p> <p>Paragraph 120 of the NPPF identifies that <i>"Planning policies and decisions need to reflect changes in the demand for land. They should be informed by regular reviews of both the land allocated for development in plans, and of land availability. Where the local authority considers there to be no reasonable prospect of an application coming forward for the use allocated in a plan:</i></p>

Respondent ref. no.	Name / Organisation	Detailed comments
		<p><i>a) they should, as part of plan updates, reallocate the land for a more deliverable use that can help to address identified needs (or, if appropriate, deallocate a site which is undeveloped); and</i></p> <p><i>b) in the interim, prior to updating the plan, applications for alternative uses on the land should be supported, where the proposed use would contribute to meeting an unmet need for development in the area.”</i></p> <p>In line with the requirements of the NPPF and as demonstrated, there is no reasonable prospect of the site coming forward for the use allocated in the current plan. On this basis, it is considered that a site allocation for residential-led use which meets an unmet need in the Borough should be brought forward in accordance with NPPG paragraph 120.</p> <p><i>Office Use</i></p> <p>In accordance with the adopted Local Plan Proposals Map, the site is located within the Key Office Area – West Twickenham Cluster. Adopted policy encourages new office development within designated Key Office Areas. While the Site may be appropriate for minor provision of office space as part of mixed-use development, it is our consideration that the Site should not be allocated for office-led development.</p> <p>Paragraph 86 of the NPPF directs main town centre uses, such as office use, to existing town centres. Policy E1 of the draft London Plan seeks to consolidate and extend office markets in outer London, focusing new development in town centres and existing office clusters, having regard to Table A1.1 which sets out centres with greatest potential to accommodate office development. The aforementioned table identifies the nearest town centre, Twickenham, as having potential to accommodate mixed-use office development. Representations submitted to Richmond Council from the GLA (dated 20 March 2020, ref. LDF22/LDD16/LP02/HA01) echoes this approach. This approach is important to ensure the vitality and viability of existing town centres. As the Site is not located within a town centre nor an existing cluster of office use, the Site is not appropriate for continued allocation as a Key Office Area.</p> <p>Moreover, the GLA’s representations state that Richmond should differentiate its approach towards industrial and office development. We agree with this consideration as it is evident that there is some overlap in the allocations of Locally Important Industrial Land and Key Office Locations, including the West Twickenham Cluster Key Office Area. Again, office development should be directed to town centres and existing office clusters.</p> <p>The Site is not located near any town centre nor the amenities required to support a significant commercial workforce. The 175 sqm of floorspace proposed as part of application ref. 19/0646/FUL is considered to be the maximum viable level that can be sustained in this location. A local demand report by Milestone Commercial was submitted in support of the aforementioned application which confirms that there is no demand for a significant level of office floorspace in this residential location outside of a centre and as such development of a significant level of offices in this location would come with a high risk of vacancy. It is identified that there are high vacancy rates of offices and falling rents within the surrounding area and Milestone’s opinion is that a fully commercial scheme would not be viable or sustainable due to the lack of demand.</p> <p><i>Brownfield Site</i></p>

Respondent ref. no.	Name / Organisation	Detailed comments
		<p>Paragraph 118 of the NPPF (July 2018) sets out that planning policies and decisions should “give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land.” The proposals accord with these objectives whilst enhancing the character and appearance of the Site and surrounding area.</p> <p>Policy 3.3 of the London Plan identifies the potential to realise brownfield housing capacity, including for mixed use redevelopment, especially with surplus commercial capacity.</p> <p>The importance of utilising brownfield Sites is maintained in the Draft London Plan and the supporting text of draft London Plan Policy GG4, which identifies that “Reusing large brownfield sites will remain crucial, although vacant plots are now scarce, and the scale and complexity of large former industrial sites makes delivery slow.”</p> <p>Planning policies at all levels encourage the effective use of previously developed land. The proposed allocation of this brownfield Site would accord with this objective.</p> <p><i>Residential Use</i></p> <p>The Site has potential to deliver at least 116 residential dwellings over a mix of unit sizes and tenures. This provides an opportunity to contribute to strategic objectives for delivery of housing, including family housing and affordable housing.</p> <p>Redevelopment of the brownfield Site, which currently comprises outdated industrial buildings, will benefit the predominantly residential character of the area. Redevelopment will remove an unneighbourly industrial use and its associated HGV trips on residential streets. The Site also provides an opportunity to open up access to the River Crane at its northern edge.</p> <p>There is a clear justification and significant benefits to be gained in the redevelopment of the Site for residential accommodation which is appropriate within the surrounding residential context. The proposed residential use is supported in line with national objectives to increase the housing supply across the capital, the London Plan aspirations to deliver new homes across London and the Local Plan requirements to deliver a significant level of new homes specifically within West Twickenham.</p>
21.	Lucy Wakelin, Transport for London Commercial Development	<p>TfL CD owns two sites within the borough which are suitable for residential development. Optimisation of both sites through residential-led development would align with Intend to Publish London Plan Policies H1 and D3, proposal 97 of the Mayor’s Transport Strategy and paragraph 122 of the National Planning Policy Framework, which seek to ensure the efficient use of land (particularly housing delivery) through maximising development potential. As requested, we provide details of the two sites below.</p> <ul style="list-style-type: none"> • Twickenham Bus Stand, Station Yard, TW1 4LG <p>Twickenham Bus Stand is owned freehold by Transport for London. At present this site has ongoing operational requirements however, TfL CD recognises that Twickenham Bus Stand has the potential for future residential development should a suitable and feasible alternative site be found to accommodate the ongoing operational requirements. This is also recognised by site allocation TW 2 – Station</p>

Respondent ref. no.	Name / Organisation	Detailed comments
		<p>Yard in the Twickenham Area Action Plan (2013) which covers Twickenham Bus Stand and the adjacent, privately owned site. A planning application was recently submitted on this adjacent site and is currently pending a decision (ref: 19/3616/FUL).</p> <ul style="list-style-type: none"> • Fullwell Bus Garage, TW2 5NX <p>Fullwell Bus Garage is owned freehold by Transport for London. This site has the capacity for a significant mixed-use redevelopment, including re-provision of the bus garage. Redevelopment of this site has the potential to provide a substantial number of new homes and aligns with Intend to Publish London Plan Policy H1 which states that boroughs should <i>'optimise the potential for housing delivery on all suitable and available brownfield sites through their Development Plans'</i>. TfL CD also has freehold ownership of the LIDL site and would look to engage with RATP and the GLA about the opportunity for a comprehensive redevelopment of the wider site. For clarity, we have provided two separate red line boundaries; one to show the TfL owned site and one to show the potential comprehensive red line, including RATP and third party ownership.</p> <p>[See Appendix for site plans]</p>
22.	Jimmy Wallace, Richmond Athletic Association	<p>Call for Sites Consultation</p> <p>The Site & Site Allocation</p> <p>The Richmond Athletic Ground is the subject of a Site Allocation (SA 23) in the adopted Local Plan (July 2018). We therefore submit to the Call for Sites Consultation that a Site Allocation should be carried forward to the emerging Local Plan but that it should be amended to better reflect the redevelopment aspirations for the Athletic Ground.</p> <p>Whilst there will be future opportunities to comment on the detailed wording of the future Site Allocation as the Local Plan progresses through its various consultation stages, we set out below some of the key requirements which we believe should be included in the Site Allocation.</p> <p>The current Site Allocation text states the following: <i>"The Council supports the continued use of this site for sports uses, including improvements and upgrading of existing facilities. Additional associated leisure facilities and other complementary uses could be incorporated provided they have been fully justified as being necessary to support the continued sporting uses on the site, that they demonstrate meeting identified needs, do not detract from the main use of the site as a sports ground, and have been developed to take account of the Metropolitan Open Land (MOL) and historic designations."</i></p> <p>The emerging Site Allocation text should be updated as follows: <i>"The Council supports the continued use of this site for sports uses, including improvements and upgrading of existing facilities. Additional associated leisure facilities and other complementary enabling uses, including residential, could be incorporated provided they have been fully justified as being necessary to support the continued sporting uses on the site, that they demonstrate meeting identified needs, do not detract from the main use of the site as a sports ground, and have been developed to take account of the Metropolitan Open Land (MOL) and historic designations."</i></p>


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		<p>We provide our initial justification for these proposed amendments below. Clearly, we reserve the ability to comment in much greater detail once the emerging Local Plan, including the proposed Site Allocation, is issued for formal consultation.</p>  <p style="text-align: right;"><i>Site Location Plan</i></p> <p>Potential Type of Development</p> <p>As set out in the introduction to this correspondence, the RAA is in the early stages of developing a revised masterplan for the Athletic Ground involving improved facilities including enhanced sport facilities and proposals for better public access and enabling uses to fund the delivery of the proposed development.</p> <p>The RAA anticipates that pre-application planning discussions with LBRuT, the Greater London Authority (GLA) and other key stakeholders will be commenced in the short term. This follows a period of ongoing project review which has sought to develop the optimum proposals for the site to guarantee the delivery of this significant project.</p>


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		<p>Whilst further discussions will take place in formal pre-application meetings and wider consultation, the current preferred approach for the redevelopment of the site is broadly comprised of the demolition of a number of the existing buildings on the site and the provision of a new Grandstand with associated uses (e.g. bar, gymnasium, changing rooms, function rooms), a new Sports Hall with community access, refurbishment of the existing Grade II listed Pavilion building, a new groundsman building together with associated ground works, enhanced playing pitches (both grass and artificial), and new floodlighting. In addition to the proposed sports uses, it is proposed that up to 100 residential units (across a range of tenures including affordable housing) will be delivered as an enabling element of the wider masterplan to cross-subsidise the delivery of the proposed new sports facilities. Whilst details including proposed drawings outlining the proposals will be provided as discussions progress, it will be clearly demonstrated how the proposed masterplan will significantly enhance the overall character and appearance of the site delivering key benefits both in terms of significantly enhanced sporting facilities but also other landscape improvements. The proposed residential component will be located on existing brownfield land within the site and will constitute a very small component of the overall site.</p> <p>Timescales & Delivery</p> <p>In terms of the availability of the site for redevelopment, the RAA envisages that the pre-application planning and engagement process will commence later this year and that subject to securing the necessary planning permissions and approvals, the development could commence by late 2021 / early 2022, albeit clearly working around the constraints of the rugby calendar. Therefore, the emerging Local Plan and Site Allocation should consider the site to be deliverable in the first 5 years of the plan period.</p> <p>We are not aware at this stage of any barriers or physical constraints that would preclude the future redevelopment of the site. The site is designated as Metropolitan Open Land (MOL). The existing Pavilion building is Grade II listed and the site lies within a Grade I Historic Park and Garden and Conservation Area as well as within the Royal Botanic Gardens, Kew World Heritage Site buffer zone. These designations are all highly relevant to the acceptability to any future redevelopment of the site and would be fully assessed during both the pre-application stages and as part of any future planning application for the site.</p> <p>We trust that our initial representations will be taken into account in preparing the detailed draft of the new Local Plan. We commend the borough for commencing this early stage engagement and review of the adopted Local Plan to ensure that Local Plan policies are developed that are fit for purpose. The RAA is very keen to engage with LBRuT at the earliest opportunity and wishes to continue to be involved in further consultations on the Local Plan process moving forward.</p>
24.	Paul Velluet	<p>3.1 As noted above [See respondent no.24 in the Direction of Travel Responses Schedule], I welcome the opportunity of putting forward a number of significant issues relating to the future of Richmond Station for consideration in the preparation of a new <i>Local Plan</i> given the failure of both the Council and the Inspector to properly or adequately consider and respond to such issues which I put forward in the consultations and submissions leading to the adoption of the <i>Richmond-upon-Thames Local Plan</i> in July, 2018. The preparation of a new Local Plan provides the opportunity to review and resolve these particular anomalies and omissions.</p> <p>3.2 As noted in the Introduction to my <i>Statement regarding Site-specific Proposal SA 19 – Richmond Station, Richmond</i> of September, 2017 (see copy attached) [See Appendix], I was, and remain, seriously concerned regarding the soundness of specific aspects of the <i>Richmond-</i></p>

Respondent ref. no.	Name / Organisation	Detailed comments
		<p><i>upon-Thames Local Plan</i> relating to Richmond Station and its future – Site specific Proposal SA 19 – given that they are insufficiently robust in providing the Council as local planning authority and the local community with effective control over development affecting the particular architectural and historic interest and significance of Richmond Station as ‘a non-designated heritage asset’, and the character, appearance and significance of the Central Richmond Conservation Area as ‘a designated heritage asset’ (in the terms commended in the relevant parts of the <i>National Planning Policy Framework</i>).</p> <p>3.3 In Section 3 of my <i>Statement</i>, I set out my concerns about the soundness of specific aspects of the <i>Plan</i> relating to Site-specific Proposal SA 19 - Richmond Station, Richmond explaining the reasons for such concerns, and putting forward my suggestion on the potential means of addressing the weaknesses of the <i>Plan</i> as then submitted and securing amendment which would contribute to providing a sounder definition of the Proposal insofar as was necessary to ensure that the particular interest and significance of Richmond Station as a non-designated heritage asset and the character, appearance and significance of the Central Richmond Conservation Area as a designated heritage asset could be sustained. In setting forward these concerns, I stressed that I saw no objections to the incorporation of wording in the proposal statement referring to the provision of improved public transport interchange facilities on the site or to the potential redevelopment of the various post-war buildings to the immediate north and south of the original station-complex subject to the satisfactory scale and design.</p> <p>3.4 Regrettably, the Inspector failed to recognise or adequately recognise the significant issues about the inherent weakness Site-specific Proposal SA 19 raised in my <i>Statement</i> in his <i>Report of the Examination of the Richmond upon Thames Local Plan</i> of the 26th April, 2018 (at paragraphs 146 to 148). Accordingly, the wording of Site-specific Proposal SA 19 in the present <i>Local Plan</i> remains unduly weak and inadequate in relation to conservation issues, but importantly, potentially damaging to the survival of the existing retail role of George Street, The Quadrant, King Street and Hill Street at the heart of Richmond given the stated objective of accommodating a substantial quantum of retail floor-space on the site.</p> <p>3.5 Regrettably, despite the advice given by planning officers to the <i>Local Plan</i> hearing in September, 2017, that a revised planning brief for the Station site was being prepared to supersede that of March, 2002 and that officers were in discussion with Network Rail about the future development of the Station, and a written request to the Council’s Principal Planner in July, 2018, for an update on the position, the highly deficient <i>Richmond Station Planning Brief</i> of March, 2002 remains on the Council’s planning policy web-site and is still referred to in the present <i>Local Plan</i> – be it now referred to a ‘development brief’.</p> <p>3.6 Many aspects of the present <i>Planning Brief</i> not only pose substantial threats to the architectural and historic significance of the existing station as a locally listed complex and the Central Richmond Conservation Area through references to potential ‘comprehensive redevelopment’ and the creation of a ‘landmark building’, but importantly, but also substantial threats to the vitality and viability of the long- established retail roles of George Street, The Quadrant, King Street, Hill Street and other parts of the heart of Richmond (and its existing cinemas) by actively encouraging the establishment of a substantially scaled, mixed-use development above the tracks including retail and leisure uses.</p>

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		<p>3.7 Importantly, a particular threat posed by comprehensive redevelopment of the Station site as envisaged in both the <i>Local Plan</i> of 2018 and the <i>Planning Brief</i> of 2002 is reinforced by the site being identified as offering potential for the development of 'tall buildings' in the Council's <i>Borough-wide Sustainable Urban Development Study</i> of September, 2008 (at paragraph 4.2.2.).</p> <p>3.8 I attach a copy of my <i>Statement regarding Site-specific Proposal SA 19 – Richmond Station, Richmond, for presentation at the relevant hearing session of the Inspector's examination</i> of September, 2017. [See Appendix for copy of earlier submission]</p>
26.	Hannah Lukacs	<p><i>[Note for context: London Square Developments sent letters to residents in the area notifying them about the Council's Call for Sites and encouraging them to provide feedback on the type of development they would like to see on the site]</i></p> <p>I was surprised by your recent letter, you quoted many figures regarding the public engagement supporting for the principle of redeveloping the site.</p> <p>Can I ask where these figures were collected from?</p> <p>I live in Crane Road and am aware that we have as a whole street presented many concerns with regards to this potential development. Whilst I understand the need for more housing in the borough, the development only appears to consider this as a factor and no other. ie school places are already at a premium, buses in the morning are packed out and many times refuse to let me on, our drains are always blocking, parking around here despite residential parking remains difficult, old peoples support and facilities are minimal. Personally I believe part of this site needs to be left as green space - not a token amount, realistic thought into the impact on local transport, school places, drainage etc etc continues to need to be considered.</p> <p>If you want family homes then this should minimally be a one side of road development to ensure parking, adequate gardens, and minimise the impact on local transport schools etc.</p> <p>Overall we continue to be anxious about any change to the site as an already packed with terraced houses cannot sustain more. I believe there are many people in Crane Road with similar concerns, we have had plans put to us with regards to housing but no options or considerations about other possible businesses, eg offices etc have been put forward, hence this appear a one horse race.</p>
31.	Tim Catchpole on behalf of the Mortlake with East Sheen Society	<p>SA24 Stag Brewery – need to review?</p> <p>SA25 Mortlake and Barnes Delivery Office – why include?</p> <p>SA27 Telephone Exchange and 172-176 URRW – comprehensive redevelopment still required</p> <p>SA28 Barnes Hospital – detailed planning still to come</p> <p>Mortlake Station – was included before and needs to be included again</p> <p>Richmond Park Academy – need to consolidate to ensure 6th form viability</p> <p>Christ's School – ditto</p>
33.	Tim Catchpole on behalf of the Mortlake Brewery Community Group	<p>Response from Mortlake Brewery Community Group</p> <p>SA24 Stag Brewery</p> <p>On 25 Jan. 2020 the Planning Committee recommended approval of (A) redevelopment for 813 housing units and various mixed uses and (B) development of a secondary school and all-weather pitch on the playing fields but refused (C) the reconfiguration of Chalkers Corner to service (A) and (B). At the time of writing there has been no news of the s106 agreement which needed to be finalized before all three applications are referred to the Mayor for decision. It remains to be seen whether the Mayor will insist on a larger affordable housing element which can only be achieved if the development were to lose some of its costly basement carpark and become more car free.</p>

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		<p>Meanwhile the ONS population projections for the Borough based partly on the 2018 birth rate data were published on 24 March 2020. This shows the 5-year olds (most being the state primary school intake population) as continuing to decline for the next 15 years while the 11 year olds (most being the secondary school intake) are shown as peaking in 2021 and then declining for the next 15 years. The picture is the same in the neighbouring boroughs of Wandsworth, Hounslow and Kingston except that the secondary school intake population peaks in 2023 before declining. This supports the finding of the Mortlake Brewery Community Group that, using the latest available data and adjusting for cohort shrinkage in the primary schools, <i>the Borough's own model</i> predicts that secondary demand in the north-east <i>including demand from children in neighbouring boroughs</i> will peak in 2021 at about 660, requiring three extra forms, and decline thereafter until at least 2025, when the demand will be about 595, requiring less than one extra form (there were no primary data to justify a prediction beyond 2025 when this finding was published). On this basis we cannot see the need for another secondary school in the east of the Borough and we urge the Council to consider once again the consolidation of the existing secondary schools in the north-east and the relocation of Thomson House School from its highly dangerous site at the Mortlake Station level crossing to the site shown in the original Planning Brief for the Brewery development.</p> <p>If the primary school is relocated then there is no need for the all-weather pitch. The playing fields should be retained, as in the original Planning Brief, with a possible upgrading of the grass turf. They are a designated OOLTI and a visual, as well as recreational, asset; they also provide a much needed soft surface serving as a soakaway in the extreme rainy conditions which are becoming more common-place in the new era of Climate Change.</p> <p>Thus, the decision on the Brewery development has not been finalized and there are still details to be submitted pursuant to planning permissions being granted. So we would like to see this site retained in the update of the Local Plan.</p> <p>We would like to add two more: Richmond Park Academy If the final decision on the Stag Brewery Site is for a Primary rather than a Secondary School then RPA will need expansion to 8-form entry. This will enable greater viability for its 6th form. There is scope to allow further expansion without encroaching onto existing spaces which are designated OOLTI and without detriment to the Buildings of Townscape Merit on the site. The Council will need to negotiate necessary funding from the DfE. We would therefore like to see this site included in the update of the Local Plan.</p>

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		 <p>Mortlake Station</p> <p>This site, including its surrounds, featured in an earlier Local Plan but not in the current version. While we are all supportive of our local timber yards and builders’ merchants remaining in the area, these are currently sited on both sides of the station and, it has to be acknowledged, do not provide the ideal ‘gateway’ for visitors arriving at the station and heading for the prestigious Brewery development to the north and Richmond Park to the south. In addition they attract sometimes dangerous HGV movements adjacent to the level crossing and also the movement of forklift vehicles amongst pedestrians accessing the station. The current situation is already dangerous but with the additional pressure due from the STAG site development would clearly become even more unacceptable without major intervention. The Brewery development is expected to generate significantly more vehicular, and especially cycling and pedestrian traffic over the level crossing. The current footways and footbridge are completely inadequate. A detailed study is required of this whole site and the scope for development and/or enhancement and funding explored.</p> <p>We would therefore like to see this site included in the update of the Local Plan. We suggest it encompasses a small portion of Mortlake Green (as may be required to accommodate a safer crossing scheme), both the timber yards, the car showroom, the builders’ merchant and the car park sufficient to provide a high quality solution to the crossing. We are also extremely concerned about the current location of Thomson House Primary School immediately adjacent to the crossing and urge the Council and the school to consider an alternative location.</p>


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		<p>In addition we would like to see the following development site outside our area included:</p> <p>Christ's School If the final decision on the Stag Brewery Site is for a Primary rather than a Secondary School then RPA will need expansion to 6-form entry. This will enable greater viability for its 6th form. There is scope to allow further expansion with only minimal encroachment onto MOL. The Council will need to negotiate necessary funding from the DfE. We would therefore like to see this site included in the update of the Local Plan.</p> 
34.	DP9 Ltd on behalf of Harlequin Football Club Limited	<p>1. Introduction 1.1 The recently published London Borough of Richmond Upon Thames Local Plan Direction of Travel Consultation document includes a request for landowners to identify sites in the borough that may be suitable for future development. 1.2 The following representations identify the Harlequin Football Club site (also known as the Twickenham Stoop) and the adjacent Twickenham Central Depot site as a major mixeduse redevelopment opportunity. Harlequin Football Club has been in dialogue with the Council regarding this opportunity for a number of years.</p> <p>2. Site Description</p>

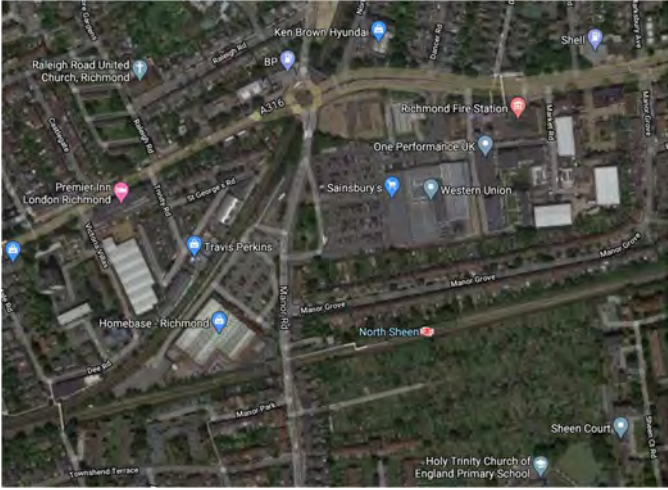
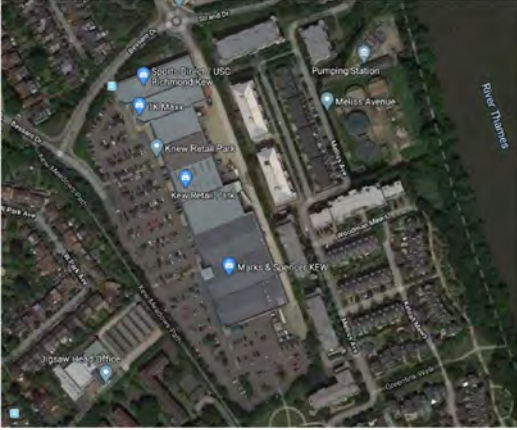
Respondent ref. no.	Name / Organisation	Detailed comments
		<p>2.1 A site location plan is included as Appendix A, and a detailed description of both sites is set out below. The combined total area of both sites is 9.7 hectares, which represents one of the largest and most important strategic redevelopment opportunities in the entire borough.</p> <p>Harlequin's Site</p> <p>2.2 Harlequin Football Club Limited, the site owner, is located on a triangular parcel of land to the south of the A316. The Site is bounded to the west by the "Duke of Northumberland River" and beyond that by the large Rosebine car park and an estate of residential properties which form part of the Rosecroft Gardens Conservation Area. Richmond Upon Thames College is located to the east of the site, itself going through a major redevelopment.</p> <p>2.3 The stadium comprises four stands, the Eastern Stand was constructed in 1996 and has a capacity for circa 4,042 spectators, with accommodation at ground and first floor level which is utilised for corporate hospitality and entertainment on match days and corporate events / meetings and private functions on non-match days. The southern end of the ground was redeveloped in 2006, with the demolition of the existing uncovered stand and the installation of a temporary Southern Stand which holds a capacity for circa 4,100 spectators, with ancillary educational facilities beneath.</p> <p>2.4 The Western end of the ground was redeveloped in 2005, with the demolition of the previous Western Stand and groundman's house and installation of a covered stand with a capacity for 3,881 spectators along with ancillary features including, players and officials facilities, club offices, club shop, a Members bar, 13 corporate hospitality boxes, an Executive club and two lounges.</p> <p>2.5 To the east of the Eastern Stand lies a triangular parcel of accessible open land, which had previously been utilised by the club for training along with hospitality events. In 2005, planning permission was granted for the development of a four-storey block of flats (67 units) on a portion of the open land as enabling works to fund the development of the Western Stand. The residential block includes both social and private housing and is known as "Challenge Court". The remaining area of open land has been retained as publicly accessible open space.</p> <p>2.6 Substantial open car parking facilities are provided on site between the stadium and the A316, providing approximately 400 on site car spaces.</p> <p>2.7 A Nuffield Health Gym is located on the eastern boundary of the Site and is within the land ownership of Harlequin Football Club.</p> <p>2.8 Vehicular access to the Site is provided via the A316, with a left turn into / out of the A316. The access road also serves the Twickenham Central Depot, with a branch route into the College Site, for use as an emergency access route by the club. The College has a right of access to use Langhorn Drive to serve its site. This junction is being significantly upgraded in the summer of 2020 to provide a traffic light left and right turn junction and new street level crossing.</p> <p>2.9 The Duke of Northumberland River forms the western boundary of the Site, with the Twickenham Central Depot and area of green open space located to the south of the Site.</p> <p>Twickenham Central Depot Site</p> <p>2.10 The Depot Site, owned by Richmond Upon Thames Council, is located immediately to the south of the Harlequin's stadium. The Site is bounded by the Richmond Upon Thames College Site to the north-east, and the Craneford Way recreation area with playing fields and children's playground to the east. The western edge of the Site lies along the path of the Duke of Northumberland River, with residential properties at Rose Croft Avenue beyond, and the main London to Reading railway line to the south.</p> <p>2.11 The West London Waste Plan (2015) identifies that the Site has been used for the following purposes:</p>

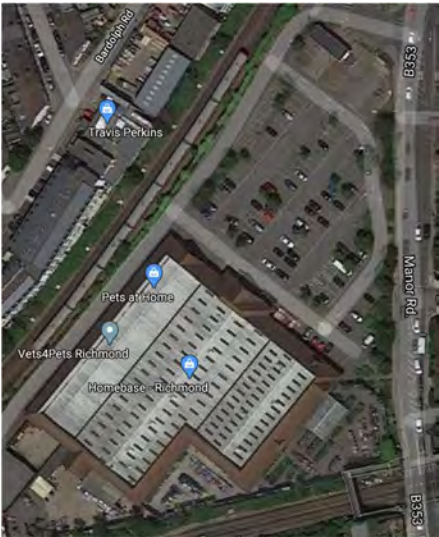

Respondent ref. no.	Name / Organisation	Detailed comments
		<ul style="list-style-type: none"> • for the parking of refuse and recycling vehicles; • material recovery facility (MRF); and • bulking facilities to support municipal recycling services, for a continuous period over the last 10 years. <p>2.12 There are a few structures currently onsite, including a two-storey residential property, prefabricated offices, a redundant Victorian brick building also known as the former pumphouse, bulking bays, workshops and covered vehicle storage.</p> <p>3. Housing Need [as under Respondent no. 34 in the Direction of Travel Responses Schedule]</p> <p>3.1 The Local Plan Direction of Travel Consultation document identifies housing delivery and meeting the housing targets set out in the London Plan as one of the key reasons why a new Local Plan is required.</p> <p>3.2 The Intend to Publish version of the London Plan (December 2019) provided Richmond with a new housing target which was substantially higher than the target set out in the adopted London Plan. The ten-year delivery target for the period from 2019/20 to 2028/29 is 6,440 new homes, which equates to 644 units per annum. The Direction of Travel Consultation document states that 315 new homes per annum will be delivered in the borough between 2015 and 2025, which highlights a major shortfall.</p> <p>3.3 To compound this particular issue, publication of the Local Plan Direction of Travel Consultation has been followed by a letter from the Secretary of State for Housing, Communities and Local Government to the Mayor of London, directing him to make changes to the new draft London Plan before it can be adopted. A relevant extract from the letter states: <i>“I had expected you to set the framework for a step change in housing delivery, paving the way for further increases given the next London Plan will need to assess housing need by using the Local Housing Need methodology. This has not materialised, as you have not taken the tough choices necessary to bring enough land into the system to build the homes needed.”</i></p> <p>3.4 Taking account of the above, one can expect that housing targets for individual boroughs will further increase in the short term. Through the new local plan process, it is therefore imperative that the Council seeks to promote the consolidation and intensification of large underutilised sites in the borough and targets the least constrained sites for higher density development. It is our strong view that redevelopment of the Harlequin’s site and the Twickenham Central Depot site can make a significant contribution to achieving these targets, whilst at the same time easing the pressure on other more sensitive parts of the borough.</p> <p>3.5 As suggested in the Direction of Travel consultation document, we support the undertaking of a borough wide Urban Design Study as a tool to help identify redevelopment opportunity sites and quantify the appropriate scale of development on individual sites.</p> <p>4. Potential Land Uses</p> <p>4.1 Through a well-designed Masterplan, and allowing for densities to increase on this important strategic site, we believe that it is capable of accommodating a wide range of uses, including the following:</p> <ul style="list-style-type: none"> • A significant quantum of new homes, including affordable homes, with a mix of tenures and sizes • A new sports stadium, subject to demonstrating long term viability • A consolidated multi-function Council Depot • Workspace, conference and exhibition space, including incubator space for start-up businesses • Hotel

Respondent ref. no.	Name / Organisation	Detailed comments
		<ul style="list-style-type: none"> • Student accommodation • Health and Leisure facilities • Retail, including bars and restaurants within the stadium <p>5. Site Opportunities</p> <p>5.1 Redevelopment of the site to deliver such uses offers significant opportunities at a local, regional and national level for the reasons set out below.</p> <p>1. Making More Efficient Use of Land - The existing site as a whole and particularly the existing Twickenham Central Depot is inefficient, uses more land than it needs and requires investment. A phased mixed-use redevelopment will make more efficient use of this important site in accordance with the National Planning Policy Framework and draft London Plan.</p> <p>2. A Masterplan led, Mixed Use Neighbourhood - A thoughtfully-designed, residential and mixed-use neighbourhood that promotes health and well-being for all, including local convenience retail.</p> <p>3. Contribute Significantly to Meeting Housing Need – Redevelopment of the site would contribute significantly to meeting Central, Regional and Local Government housing targets. There is significant marriage value of more homes from coordinated development of the depot site and the Stoop site together. A masterplan delivering significant numbers of homes of varying size and tenure would generate a substantial New Homes Bonus to Richmond, and of course significant CIL and S106 contributions.</p> <p>4. New Leading-Edge Sustainable State of the Art Stadium for Harlequins – A viable overall scheme incorporating a new Harlequin’s home 25,000 seat stadium and associated enabling development will generate multiple economic and social benefits for the borough, and secure the long-term future of Harlequins in this location.</p> <p>5. A Safe and Sustainable Community - Creating a place that enables community ownership and participation; a place with identity where you know your neighbours and your neighbourhood.</p> <p>6. Creating a Well Connected & Easy to Navigate Neighbourhood - A people-focused neighbourhood which prioritises pedestrians, cyclists and public transport connections, underpinned by a simple and easy to navigate network of streets and routes.</p> <p>7. Designing for the Future Residents of Richmond - A leading edge sustainable development, with the aspiration to deliver a highly sustainable stadium better than anything done before as well as zero carbon housing and utilising new technologies, serving as an exemplar for development projects in the borough.</p> <p>8. Delivering New Public Open Space - A series of landscaped public spaces with their own individual character creating considerate transitions between the scale of areas around the new neighbourhood and the stadium.</p>



Respondent ref. no.	Name / Organisation	Detailed comments
		<p>9. Protecting and Enhancing the Existing Landscape & Ecological Assets - Using the site's natural assets to actively inform the design of the neighbourhood and connect to wider green and blue networks to enhance local biodiversity and public amenity.</p> <p>10. A Collaborative Approach to Working with Stakeholders - Working with the Council together with the local resident and business community in a fully collaborative way to develop shared goals and ensure that investment benefits the local population, and specifically working with Friends of the River Crane Environment (FORCE) to genuinely improve the river corridor.</p> <p>11. Cross Pollination with Richmond College – A redevelopment of the site would facilitate the strengthening of ties with the regenerated Richmond College and create cross-over with their education syllabus and the professional training needs at Harlequins.</p> <p>12. Investment in Richmond - Harlequins currently makes a significant financial contribution to the Borough. Independent assessments of Gross Value Add (GVA) demonstrate the Club's contribution equates to £34 million per annum. Using the same methodology, a new stadium with associated enabling development could increase Harlequin's GVA contribution to circa £95 million per annum.</p> <p>6. Masterplan Concept</p> <p>6.1 Harlequins needs to invest in its club for many reasons including:</p> <ul style="list-style-type: none"> • Customer expectations from sporting experiences; • The changing nature of rugby for example women's rugby; • Competitors improving their facilities; • The ability to bring the existing training facility on site; • To remain competitive; and crucially • The ability to remain financially sustainable. <p>6.2 All of the above mean that doing nothing is not an option for the club. If comprehensive redevelopment is not achievable at the Stoop, Harlequins will be forced to relocate.</p> <p>6.3 Harlequin Football Club Limited has engaged the services of a full professional design team to pursue redevelopment proposals for the site, led by Populous Architects and Karakusevic Carson Architects. The images overleaf give an early visual indication as to what could be achieved on this important site.</p> <p>7. Next Steps</p> <p>7.1 Our team will continue to discuss our proposals with the Council and seek to engage with the local community. In the meantime, we trust that the Local Plan team will keep us informed as the consultation process progresses.</p> <p><i>[See Appendix for site plan and sketch views, along with site location plan]</i></p>
35.	Alice Roberts, CPRE London	ANNEX 1: appropriate sites for intensification for residential, commercial or mixed-use development

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		<p>Fulwell - Sites around the Bus garage, including supermarket car parks, could be redeveloped to meet housing demand. The site has a PTAL rating of 3. Several bus stops surround the site. Fulwell Railway Station is adjacent. The site can be developed car-free (with car club parking provision only) to maximise use of space and accommodate people who don't have access to a car (including older people, younger people and those on low incomes).</p> <p>There should be <u>no</u> development on any areas shown which are MOL or Green Belt.</p>  <p>North Sheen - Near to North Sheen Station there are a number of large buildings and large open car parks for example, at Homebase and Sainsbury's near Manor Road. The site has a high PTAL rating of 5. The site can be redeveloped car-free to accommodate people who don't have access to a car.</p>

Respondent ref. no.	Name / Organisation	Detailed comments
		 <p>Kew Retail Park - This site could be re-developed to move away from car-dependent retail and /or reduce surface car parking (moving towards car club parking) to intensify the site for both residential and commercial space.</p>  <p>Homebase North Sheen - The car park and Homebase site at North Sheen can be intensified for mixed-use development</p>

Respondent ref. no.	Name / Organisation	Detailed comments
		 <p>Richmond Station – car parking at Richmond Station could be replaced with commercial and/or retail development which would also serve to discourage car trips</p>  <p>Sainsbury's Hampton This site is a concern because it ought never have been turned over to car park, being MOL as it is. In the circumstances, there could be a compromise which helps to reduce car dependency and increase housing in the borough, while returning some of the MOL back to green</p>

Respondent ref. no.	Name / Organisation	Detailed comments
		<p>space (along the river, to support nature and wildlife). The low rise retail unit and part of the car park could be redeveloped for a new car-free, mixed-used neighbourhood while reducing car dependency, car-trips, pollution, congestion and road danger.</p>  <p>Oldfield Road light industrial site - This site could be intensified either for mixed use or to increase commercial space in the borough</p>  <p>Stanton Avenue – various surface car parks – space could be used to increase commercial space in the borough</p>

Respondent ref. no.	Name / Organisation	Detailed comments
		 <p data-bbox="566 839 2067 906">Lower Teddington Road - There is also some space which could be better used, currently given to what appears to be garages and surface car park, in the area to the east of Lower Teddington Road, to the south of the railway line.</p> 

Respondent ref. no.	Name / Organisation	Detailed comments
46.	Joan Gibson	<p>In what capacity are you responding to this consultation: I live in the local area</p> <p>Site Location: Whitton Community Centre and car park. Percy Road, Whitton. This is owned by the council and is an old inefficient (in emission terms) building. Site is large</p> <p>Type of Development: Leisure & Housing</p> <p>the Local plan wants to use sites more efficiently. You can car-lite build housing on this site with a car park in the basement for the community and medical centre (next door). The community centre can occupy the ground floor - this rebuild will make it carbon neutral. The location is excellent with good train services (buses need improving), schools, NHS services and the High Street shopping centre all in walking distance. The area can be greened as it is mostly tarmac at the moment to add to biodiversity.</p> <p>Potential scale of development: 4 storey 32-50 flats.</p> <p>Site availability: It belongs to you - can be available anytime</p> <p>Potential constraints: The key community centre courses and such things as the food bank can be moved to next door Twickenham school out of school hours and Whitton youth zone during school hours.</p> <p>Barriers to delivery: No</p> <p>In what capacity are you responding to this consultation: I live in the local area</p> <p>Site Location: Anywhere there is a large supermarket and car park or business park. Short list is: Sainsburys, Homebase and MacDonalds - St Clares Rugby road business parks and Tescos. There are a lot more large supermarkets and business parks in Richmond</p> <p>Type of Development: Retail, Leisure, Office, Warehousing & Housing</p> <p>These are large sites mostly tarmaced over. you can build on these sites by placing car parks underground, making sure public transport is right for car-lite developments, offices, leisure facilities and shops on the ground floor. Flats covering the site of the shop / office / warehouse and car park. Space can also be allocated to green the sites as they are currently bereft of greenery.</p> <p>Potential scale of development: 100+ flats on each site</p> <p>Site availability: Must ask the owners - Tesco and Sainsburys are already open to development of this sort - gives them more customers on site. Other businesses will be open to having more customers and employees on their doorstep and modern efficient premises.</p> <p>Potential Constraints: The business will need to keep going whilst development happens. This however is achieved all the time in other developments.</p> <p>Barriers to delivery: Yes. I assume you will have to upgrade sewers, water etc.</p> <p>In what capacity are you responding to this consultation: I live in the local area</p> <p>Site Location: Old Deer Car Park Richmond (and many other council car parks)</p> <p>Type of Development: Office & Housing</p> <p>You can build car-lite developments over your car parks. The car park can be moved underground with office / cultural space on the ground floor. Old Deer Park is perfect location with good transport links etc. The car park is also large so you can green parts of what is a large tarmaced space.</p> <p>Potential scale of development: Very large - multiple 100s of flats in a popular location</p> <p>Site availability: You own it so it can be available now</p> <p>Potential Constraints: Needs to be very much car-lite</p>

Respondent ref. no.	Name / Organisation	Detailed comments
55.	Jon Rowles	<p>Barriers to delivery: Yes. Large site sewers etc.</p> <p>In what capacity are you responding to this consultation: I live in the local area</p> <p>Site Location: Bridge Farm Nursery, Hospital Bridge Road, Twickenham, TW2 6LH</p> <p>Type of Development: Other & Housing</p> <p>This site could be used as either: a) A site to relocate Bishop Perrin School. Currently, it is a small school with only one form of entry. Relocating the school across the road would allow it to be enlarged and help meet the need of extra school places – without further enlarging the alternative schools in the area which are already on the large size. (b) It could be used as a site for an alms-house so there is affordable housing for old people in perpetuity</p> <p>Potential scale of development: The site will in the shadow of a huge standard schools block – though a primary school are typically single-story and thus would not be intrusive. The site currently has a mixture of warehouses, sheds and greenhouses so the developed footprint could be less than there is currently.</p> <p>Site availability: The site was reserved burial land for Hounslow Council, but since the majority of the reserved land has been leased to the ESFA for the building of Turing House School – the area occupied by Kingston Landscape Group has become detached from Borough Cemetary. Hounslow Councils new cemetery strategy shows they have removed this site from their list of reserved sites which indicates they may dispose of it.</p> <p>Potential Constraints: It will be next to a large secondary school with shared access – so there will be safety concerns.</p> <p>Barriers to delivery: Yes. Site access.</p> <p>[See Appendix for site map]</p>
72.	Andrew Weeks	<p><u>Windfall development land in Hampton</u></p> <p>I am a long-standing resident of Hampton at [full address details removed for data protection] and my work takes me all over Richmond Borough. You have made a ‘call for sites’ that local residents consider suitable for development, particularly for new homes in the light of Richmond’s Housing crisis. I would recommend that consideration should be given as a ‘windfall site’ for new housing on a small pocket of wasteland on Lower Hampton Road, Hampton, immediately west of Thames Water’s Sunnyside reservoir:-:</p> <p>1/ The land lies south of the road, between Sunnyside reservoir and the access road to Armadale villa, Birkholme villa & Garden Cottage. It is surrounded by Garden Cottage to the South and two new- build houses immediately to the west. Essentially it is part of Lower Sunbury riverside settlement, rather than Hampton.</p> <p>2/ Previously it was part of Thames Water’s operational land. It was sold-off around 10 years ago into private ownership and has been apparently virtually unused since, apart from occasional materials storage in some old sheds and shipping container, and on the concrete hard standing. The open land is treeless with just rough grass and brambles. It has no public access.</p> <p>3/ There is existing drop-kerb access from Lower Hampton Road – still in occasional use by Thames Water’s lorries to their reservoir for maintenance.</p> <p>4/ To my knowledge it has never been subject to flooding and @ 500 metres from a bus stop on the frequent 216 Kingston to Staines route.</p>

Respondent ref. no.	Name / Organisation	Detailed comments
		<p>5/ In early 2017 (I think February) your officers ran a Public consultation at Tangle Park, Hampton on the proposed Hampton SPD future plan where this pocket of land was neither shown as being in a Conservation Area nor designated as Green Belt on the detailed consultation map. If I recall correctly, the Green Belt boundary appeared to follow the reservoir embankments clearly <u>excluding</u> this pocket of waste land. That same map was adopted as policy by Richmond Cabinet in June 2017 and is now consolidated in Richmond's final, current 2018 Local Plan.</p> <p>6/ It is a notable recent precedent that two substantial houses are approaching completion on an almost identically-sized plot of previously neglected land immediately to the west of this 'windfall' site – photo attached. If this adjacent land was considered suitable for residential development, surely this v similar small infill site should be equally suitable? At least one, potentially two new substantial homes in Hampton; replacement of a long-standing derelict eyesore by (hopefully) some new-housing that reflects the style of the neighbouring Armadale and Birkdale Villas; a small but worthwhile to Richmond's sustainable housing. I commend this windfall site to your review. <i>[Note no photo attached to the response, however sufficient details of the site have been provided]</i></p>
73.	Pegasus Group on behalf of Sheen Lane Developments	<p>On behalf of Sheen Lane Developments we wish to submit representations to the London Borough of Richmond upon Thames "Call for Sites", in respect of the car park formerly associated with the St Margaret's Business Centre, Moor Mead Road, Twickenham, TW1 1JS. Sheen Lane Developments are a residential developer in agreement to purchase the site from the freehold owners of the Business Centre, PPF Real Estate Nominee 2 Limited. For the reasons detailed within this submission, we consider the site is suitable, available and deliverable for residential purposes.</p> <p>The Site As shown on the accompanying Site Location Plan (Dwg No. L192301-D09-001), the site being submitted as part of this "call for sites" comprises land formerly used as surface car parking associated with the St Margaret's Business Centre, which adjoins the site to the south-west. The car park is surplus to the requirements, and soon to form separate ownership from, the St Margaret's Business Centre, which comprises of 7no. industrial units served by adequate parking within forecourts directly to the front of the units.</p> <p>The site is largely square and measures approximately 0.06 hectares in size. The site is bound to the north by Godstone Road and Winchester Road to the east, which are characterised by 2-storey terraced and semi-detached residential properties. The site is located within a sustainable location being 250m to the west of St Margaret's Railway Station and the adjoining shops and services.</p> <p>The adopted Local Plan allocates the St Margaret's Business Centre as a "Locally Important Industrial Land and Business Park", however the site falls outside of this designation being physically separated from it. Accordingly, the site is not currently designated for development being "white land". Since the grant of planning permission in 1982 for the Business Park (Ref. 82/0457), the site has always been used intermittently for overflow car parking and has never assumed an employment use.</p>

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		<p>The site does not lie within a Conservation Area and none of the buildings within immediate vicinity are statutory Listed. According to the Environment Agency indicative flood maps, the site is wholly located within Flood Zone 2, which has a medium probability of flooding (between a 1 in 100 and 1 in 1,000 annual probability of river flooding).</p> <p>Whilst the site is predominately hard standing, there is vegetation on the site's perimeter, with the mature trees protected by a group Tree Preservation Order, made on 17th October 2019 (Ref. T1049 A1).</p> <p>Assessment</p> <p>The aforementioned site represents a brownfield site which, in our view, is suitable for residential development and should be considered as part of this "call for sites" process.</p> <ul style="list-style-type: none"> • The site measures 0.06 hectares in size and is capable of supporting 4-8 dwellings (66-133dph), depending on whether townhouse or flatted configuration. The site has been subject of pre-application discussions with LB Richmond upon Thames, where initial design options were considered (Annexed to this submission); • The site is 'suitable' for residential development, with the existing car park use being surplus to the requirements of the adjoining Business Park. The site is not in employment use and the residential development of the site would make efficient use of this underutilised site; • The site is 'available' for development being in single ownership (PPF Real Estate Nominee 2 Limited) which is under purchase agreement by Sheen Lane Developments; and • The site is 'deliverable'. Subject to the grant of planning permission, the site can be delivered in the short-term. <p>The main constraint from a planning perspective is the site's location within Flood Zone 2, however the nearby River Crane benefits from flood defences at the closest point to the site. The site also benefits from mature trees which are subject to a recent Tree Preservation Order. Appropriate layout design will seek to retain those trees of arboricultural value where possible, with any replacement planting forming part of a comprehensive landscaping solution for the site.</p> <p>Based upon the site's credentials described within this letter, it is our view that the site would benefit from designation for residential purposes as part of the emerging Local Plan. The site can make a valuable contribution towards the delivery of housing in the Borough, as is currently under-used and serves no meaningful purpose for either car parking or employment use. The site is previously developed land located in a sustainable residential area.</p> <p>Should you require any further information then please do not hesitate to contact me, otherwise I trust the above site will be considered as part of the "call for sites" process.</p> <p><i>[See Appendix for 'Design Constraints and Opportunities', 'Townhouse Sketch Proposals (4 units)', 'Flatted Sketch Proposals (8 units) and site location plan]</i></p>
74.	Savills on behalf of Thames Water	<p>Thames Water consider that the following sites are suitable for residential or mixed-use development:</p> <p>1. Land to West of Stain Hill West Reservoir, Hampton Water Treatment Works, Upper Sunbury Road:</p>

Respondent ref. no.	Name / Organisation	Detailed comments
		<p>Site area: approximately 3.58 hectares (refer to enclosed location plan). Current use: vacant. Proposed use: residential or mixed use development. Likely availability: 1-5 years.</p> <p>The site is currently within the Green Belt, but is very well contained and sandwiched inbetween the Stain Hill West Reservoir to the east and residential development along Kenton Avenue with Upper Sunbury Road forming the northern boundary and Lower Hampton Road forming the southern boundary. The site does not perform strongly in Green Belt terms and should therefore be assessed and removed from the Green Belt under the forthcoming Green Belt Review.</p> <p>2. Hydes Field, Land to North of Hampton Water Treatment Works, Upper Sunbury Road:</p> <p>Site area: approximately 21.18 hectares (refer to enclosed location plan). Current use: mixed use. Proposed use: residential or mixed use development. Likely availability: 1-5 years.</p> <p>This site is currently within the Green Belt, but is also well contained and sandwiched between development along Oldfield Road and Kempton Racecourse with Upper Sunbury Road forming the southern boundary and the railway line to the north. The site does not perform strongly in Green Belt terms and should therefore be assessed and removed from the Green Belt under the forthcoming Green Belt Review.</p> <p>The above sites are currently retained operational land but are included in a review that Thames Water is carrying out of its landholdings to establish whether the site can be released for redevelopment. There may also be other landholdings within the locality that may be suitable for development and Thames Water would be pleased to discuss the potential for making these sites available further with the Borough.</p> <p><i>[See Appendix for site plans]</i></p>
75 (a)	David Taylor	<p><u>LB Richmond Call for Sites. March 2020: LAND at HAMPTON</u></p> <p>1. Respondent's role I live in the local area and own a developable site in Hampton</p> <p>Name & address David Harvey Taylor <i>[full Teddington address details removed for data protection]</i></p> <p>2. Site location</p>

Respondent ref. no.	Name / Organisation	Detailed comments
		<ul style="list-style-type: none"> - A pocket of land on Lower Hampton Road lying between two new-build houses to the West, Garden Cottage to the South and the operational Sunnyside reservoir to the East. Post code TW16 5PR. - Copy of Land Registry title map No TGL394983 attached. [See Appendix for site plan] <p>3. Suggested development</p> <ul style="list-style-type: none"> - Residential Housing - The land was formerly owned by Thames Water for industrial material storage. The land was sold into private ownership in 2014 with the existing sheds & shipping container continuing to be used for materials storage; after brief use to graze goats, the residual open land has been derelict since 2015. - It is a sustainable location, above the flood plain that Environment Agency confirm only has a likelihood of flooding of 1:1000 years. There is a bus-stop on the high-frequency Staines – Kingston 216 bus route about 500m away. There are no trees on the land and v limited bio-diversity (probably due to activity of previous owner’s goats!). Mains water and power is available on-site but there is no local mains drainage: the site is large enough to contain a foul water drainage field (as neighbouring properties have). <p>4. Potential scale</p> <ul style="list-style-type: none"> - The 0.13 hectare site is slightly larger than the immediately adjacent site to the West (in Spelthorne BC) on which 2x new-build 4-bed houses are nearing completion. - The neighbouring, detached Victorian Villas to the South (Armada) and West (Birkholme) are substantial, imposing 3-storey properties. - There is existing dropped-kerb access into Lower Hampton Road - Comparatively large gardens are needed for a private foul-water drainage field system. <p>5. Availability Currently available</p> <p>6. Potential constraints on development</p> <ul style="list-style-type: none"> - LB Richmond continues to claim that the pocket of land is Green Belt, but it does NOT meet the criteria for such designation and was never so-designated whilst administered by Spelthorne BC until 1995. Under Spelthorne’s custody the local GB boundary followed the ‘permanent’ Reservoir embankments, in line with PPG3 guidelines – as shown on attached plan. - Richmond’s 1996 UDP (1st after inheriting custody of the site) EXCLUDES the land from its GB Policy statement ENV4 and from two supporting, defining maps Nos 3 & 4 illustrating the limited expansion of GB designation over other parts of nearby Hampton land concurrently inherited administratively from Spelthorne. The same UDP contains a ‘proposals’ map, without any justifying commentary, that shows Richmond’s GB boundary now following the Borough’s new Administrative boundary, rather than the reservoir embankments, and colours the site as GB – again see attached plan.

Respondent ref. no.	Name / Organisation	Detailed comments
		<ul style="list-style-type: none"> - LB Richmond have no evidence of implementing the necessary due process required of public consultation, proposal and policy approval to amend the GB boundary to have included my land – now simply saying <i>‘it was owned by Thames Water’</i> : ownership has never been a valid PPG3 yardstick for GB designation. - The 2005 LP simply duplicates the erroneous 1996 UDP summary map and states, correctly, that there was no change to Borough’s GB boundaries at that time. - In February & March 2017 Richmond held local public consultation meetings on the Hampton SPD village future plan with a Green Infrastructure map that showed my land EXCLUDED from GB designation. That map was adopted unchanged by Richmond Cabinet on 13.June 2017 and then consolidated into the current 2018 Richmond LP. - Also in 2017, LBRUT’s current Cabinet Member for Environment & Planning, after personally reviewing the land’s chronology, recommended that Officers <i>‘should give serious consideration to conceding that the site is not legally designated as GB’</i>. No action taken by Council officers. - Concluding the EiP of Richmond’s 2018 LP, and despite being INSTRUCTED by Council not to review the Borough’s GB, the SoS Inspector’s Report published on 26.4.2018 (now an integral part of the current 2018 LP) contains the following statement <i>‘it is for the Council to satisfy itself that the established GB boundary is accurately identified on policies map should the Council identify that the previous depiction is inaccurate, it has the ability to correct it AS A MATTER OF FACT’</i>. He added a codicil confirming that his comment specifically referred to what is my pocket of land. - Previously at the meeting on 13.12.2016 under item 450, resolution 4b LBRUT Cabinet had agreed that <i>‘authority be delegated to the Planning Policy and Design Team Manager to agreeminor amendments to the final version of the (2018) Plan as are necessary to make it sound following the public consultation period’</i>. No such corrections were made in response to the Plan’s EiP Inspector’s concerns identified in his Report about Richmond’s claimed GB designation of my land. - The 2020 London Plan observes in Paragraph 455 that <i>‘some brownfield (GB) land is derelict and unsightly and does not provide significant benefits. In any event it is implausible to insist that the GB is entirely sacrosanct’</i>. - The ‘Green Infrastructure and protecting of our Open land’ section of Richmond’s ‘Direction of Travel’ document states <i>‘There could however be a small number of sites or pockets of land that could benefit from a thorough assessment against the relevant policy criteria for (GB) designation. In the event that a very small number of sites no longer meet the criteria for Green Belt They could be considered for providing land to address our unmet needs for Housing.’</i> <p>7. Infrastructure constraints</p> <ul style="list-style-type: none"> - None
75 (b)	David Taylor (online response)	<p>In what capacity are you responding to this consultation: I live in the local area and owns potentially develop-able land in the Borough</p> <p>Site Location: Land adjacent to West of Sunnyside Reservoir, Lower Hampton Road, Hampton. Registered at Land Registry title number TGL394983- copy attached. [See Appendix for site plan]</p> <p>Type of Development: Housing</p>

Respondent ref. no.	Name / Organisation	Detailed comments
		<p>- The brownfield site immediately abuts the location of a pair of new-build houses currently approaching completion on an almost identical, but slightly smaller plot of land to the West. Spelthorne BC approved construction of these new-builds under delegated planning approval Ref:18/00659/FUL</p> <p>- Formerly owned by Thames Water for industrial storage, the site has been derelict for over 5 years: there are 3 derelict sheds and hard standing on the land.</p> <p>- There are no trees and minimal bio-diversity on the site; land was used by a previous owner as goat pasture.</p> <p>Potential scale of development: Potentially a similar scale development to the two 4-bed houses nearing completion on the immediately adjacent site.</p> <p>- one of the houses would be constructed as a self-build.</p> <p>- the site already has existing drop-kerb access onto Lower Hampton Road.</p> <p>- the site is less than 600m from a bus stop on the high-frequency 216 Staines – Kingston route.</p> <p>Site availability: Currently available</p> <p>Potential Constraints: The site does not meet the Green Belt criteria required under NPPF and was never so designated whilst administered by Spelthorne BC until 1995.- LB Richmond 1996 UDP EXCLUDES the site from it's GB Policy statement ENV4 & two defining maps Nos 3&4 expanding GB designation over parts of the land transferred from Spelthorne. The same UDP contains a 'proposals' map, without any commentary, that erroneously colours the site as GB.- the 2005 LP simply duplicates the erroneous 1996 map and states there will be no change to the Borough's existing GB designations.- in 2017 LBRUT's Cabinet Member for Environment & Planning, after reviewing the land's chronology, recommended that Officers should 'give serious consideration' to conceding that the site is not legally designated as GB.- despite the SoS Inspector being INSTRUCTED by LBRUT Officers not to Review Richmond's existing GB boundaries, his EiP Report (now an integral part of the final approved 2018 LP) contains the following statement ' it is for the Council to satisfy itself that the established GB boundary is accurately identified on policies map..... should the Council identify the the previous depiction is inaccurate, it has the ability to correct it AS A MATTER OF FACT'. He added in the LP that this comment specifically referred to this particular piece of land adjacent to Sunnyside Reservoir. LBRUT made no correction to their draft plan.- Para 70 of the Inspector's EiP Report in current 2018 LP also states, concerning Hampton Treatment Works, that 'application of (latest) national policy will enable due consideration to be given to development proposals on ANY site and their justification'.</p> <p>Barriers to delivery: No</p>
76.	Henry Clive	<p>I'd like to register my objection to the development of the old Greggs factory into residential units. I would strongly prefer an amazing community space such as a wildlife park/green space, and my second choice would be development into an underground station for an extension to the District Line. If neither of these are achievable, and if a residential development has to go ahead, then it must not be allowed to go ahead as per London Square's current planning, which I have already objected to during the previous consultation.</p>
77.	Jennifer Farrell	<p>I'm writing regarding the Local Plan Call For Sites 2020 Consultation, in particular regarding the former Greggs Bakery site in West Twickenham.</p> <p>I am a local resident.</p> <p>London Square will be submitting an application for residential development on this site and I would like my objection to this noted.</p>

Respondent ref. no.	Name / Organisation	Detailed comments
		<p>Previously I was open to the idea of residential development but having seen the density of their many proposals, even after they scaled them down, I am fully against this and would prefer the site to stay as industrial.</p> <p>I bought my home here 16 years ago and more and more pressure has been put on over the years. New apartment blocks have been built, a school has been added and this small network of roads can't take much more congestion, especially not a dense new development of multiple homes. It's unrealistic and unfair to keep adding more and more people per square metre to this small area.</p> <p>I ask you to please take the many existing residents into consideration.</p>
78.	Graham Green	<p>In what capacity are you responding to this consultation: I live in the local area and work/study in the local area Site Location: Greggs Bakery, Gould Road, Twickenham Type of Development: Office & other Application 19/0646/FUL seeks a fully residential redevelopment of this former employment site. The developer maintains that poor access and other constraints make the site unsuitable for continued commercial use. I do not agree. The site remains suitable for employment uses such as office, light industry, studio/workshop or similar non-polluting uses which can be carried out adjacent to residential property without seriously harming residential amenity.</p>
79.	Max Hampton	<p>Site Location Land to the Rear of 271 Hanworth Road, Hampton, TW12 3ER.</p> <p>271 Hanworth Road's very long rear garden provides the potential to accommodate development. Similar properties along Hanworth Road have had infill developments built, as can be seen in the attached aerial image. This site particularly lends itself to development, as it runs alongside a private road. This road forms part of the adjoining site, Glenmill, which is a block of flats owned by Richmond Housing Partnership (RHP) housing association. The land to the rear of the adjoining property, 273 Hanworth Road, also has the potential to be incorporated into the development, which would maximise the potential of the site.</p> <p>The site is well located, with local shops (a parade of shops next to Hampton High and a Sainsbury's), primary school (Buckingham Primary School), secondary schools (Hampton High, Hampton School and Lady Eleanor Holles) and a park (Hampton Common) all within a short walking distance. The site is also close to the larger Sainsbury's on Hampton Road and is well served by public transport, with Hanworth Road being a main bus route.</p> <p>Type of Development The land is suitable for residential development, with the potential to accommodate different tenures, types and needs.</p> <p>Scale of Development On its own, the site has the potential to accommodate a single new dwelling. There is the potential for a more substantial development, if the land to the rear of 273 Hanworth Road is incorporated and the development is integrated with the adjoining Glenmill site. This would provide the opportunity to create a mews, with a terrace of two or three storey houses or flats. The new dwellings would sit on the land to the rear of no. 271 and their gardens would be on the land to the rear of no. 273. Incorporating the development with the Glenmill site</p>

Respondent ref. no.	Name / Organisation	Detailed comments
		<p>would provide the opportunity to turn the access road into a mews, with the new dwellings facing Glenmill. From an urban design perspective, the development would define the new street and provide a greater sense of enclosure. The development would also provide the opportunity to make improvements to the surrounding area, such as new street trees and cycle parking. Attached is an example of how such a development could accommodate six houses (two storey/three bedrooms/approx. 95sqm), although there is the potential for the buildings to be three storeys and to accommodate flats.</p> <p>Creating a mews, with buildings facing Glenmill, would integrate the development and positively contribute to the wider area, as well as minimise the loss of green space. The development could also include measures to improve biodiversity and mitigate flood risk & climate change. For example, by including the planting of new trees and designing the houses/flats to have a green roof.</p> <p>It is also considered that the wider Glenmill site has the potential for further development. The garages and area at the back of the site could be replaced with another terrace of properties that, in combination, would create a good number of new homes.</p> <p>Site Availability As owners of the land to the rear of 271 Hanworth Road, we are happy to make the site available for development immediately. The owner of the adjoining property, 273 Hanworth Road, is also interested in seeing the sites developed together and has submitted a separate consultation response.</p> <p>Constraints to Development The full development potential of the site would require the involvement of multiple land owners. I have had very positive discussions with the owner of 273 Hanworth Road, but what would help bring the site forward for development is greater certainty about gaining planning permission. I am a town planner and believe that the site has the potential to be developed and that the proposal, as described above, would create a high quality development that would provide new housing and positively contribute to the wider area. It would be extremely helpful if the Local Plan could allocate the site for development and/or have a positive policy that is supportive of this type of development.</p> <p>[See Appendix for site location plan, aerial photograph and a sketch]</p>
80.	Lira Cabatbat	<p>In what capacity are you responding to this consultation: I live in the local area Site Location: Land at the back of 102 Sheen Road and adjacent to 2 Sheen Park, Richmond Type of Development: Housing The area / land is presently unused. It has not been used as a garden or green space for as long as records show. The land is located between 102 Sheen Road (rear) and 2 Sheen Park Richmond. Potential scale of development: A detached family house constructed to be very similar to 2 Sheen Park, a red brick Victorian property. Site availability: Available now subject to planning permission Potential Constraints: Richmond council has previously raised concerns at pre-application process. Barriers to delivery: No. It is submitted that any concerns / constraints raised are unwarranted.</p>

Respondent ref. no.	Name / Organisation	Detailed comments
81.	Dawn Roads	<p>In what capacity are you responding to this consultation: Company Director of company which owns land/site in the London Borough of Richmond upon Thames</p> <p>Site Location: Arlington Works 21-27, Arlington Road, Twickenham, Middlesex TW1 2BB</p> <p>Type of Development: Other</p> <p>Mixed use - residential and commercial/industrial/office</p> <p>Potential scale of development: 24 residential unit minimum of 5 commercial/industrial/office</p> <p>Site availability: 3 months</p> <p>Potential Constraints: Planning is currently going to appeal as refused by Richmond Council in September 2019</p> <p>Barriers to delivery: No</p>
82.	Campbell Brown	<p>In what capacity are you responding to this consultation: I live in the local area</p> <p>Site Location: An approximately 47m x 20m L-shape made up of two (two adjoining garden lands) alongside Glenmill roadway, off Hanworth Rd., Hampton, TW12 3EF. It is brownfield land currently forming the extended rear gardens of No's 271/273 Hanworth Rd. There are no significant trees or existing buildings on the land. RHP's 3-storey block of flats are on the Eastern side of Glenmill roadway; the 3-storey Victorian villas No's 271/273 lie to the North of the land. A comparatively recent single storey house abuts the land to the West.</p> <p>Type of Development: Housing</p> <p>Residential housing. Attached sketch shows the potential site in RED. The GREEN overlay illustrates a possible location for 3 two-storey houses, with required on-site parking at A,B,C. The logical pedestrian & vehicular access would be via RHP's existing roadway - this favoured access shown in YELLOW. This is a potentially fully sustainable site with suitable amenity space, no on-site trees, no risk of overlooking of existing properties, possible on-site parking for each house (marked A/B/C. Hanworth Rd had an existing 24hours 111 bus route Kingston/Heathrow plus frequent R70 route to Richmond. One of the 3 possible houses could be provided under 'Shared-Ownership' rules.</p> <p>Potential scale of development: A possible terrace of 3 / 6m 2/3 bedroom houses.</p> <p>Site availability: As part owner the combined garden land could possibly be available in the near future.</p> <p>Potential Constraints: Development of the land would require successful negotiation of a Wayleave access agreement with RHP, as shown, for vehicles and pedestrians. RHP have confirmed that granting such an agreement would not conflict or constrain their future plans for their Glenmill flats or their currently under-utilised land - BLUE on plan. There is an obvious opportunity to form a partnership with RHP to develop RHP's under-utilised Glenmill land, but we understand that any such development plans by RHP of their land are currently in abeyance.</p> <p>Barriers to delivery: No. However, there is a public sewer running across our land (without manholes)- marked. A Thames Water build-over agreement would be required.</p> <p>[See Appendix for sketch]</p>
83.	Chris O'Rourke	<p>In what capacity are you responding to this consultation: I live in the local area</p> <p>Site Location: Greggs Bakery site</p> <p>Type of Development: Other</p> <p>A low density development, considerate to the local area with a limited number of residential sites and commercial space for local businesses.</p> <p>Potential scale of development: The development should be low rise, not higher than the current building profile. The development should be self contained for parking needs and open space. The development should take into consideration local traffic and public transport</p>

Respondent ref. no.	Name / Organisation	Detailed comments
		<p>constraints. The development should also facilitate additional access opportunities with bridges and pathways to the parks and reserves located on the other side of the river.</p> <p>Site availability: The site is ready for development now.</p> <p>Potential Constraints: Road access in the area is constrained and this needs to be considered by the development. Parking is also restricted and space for residents must be provided on site. Public transport is limited and the additional burden this will place on local infrastructure needs to be addressed. The development cannot be out of place with the local character in terms of visual appeal and also size. The area has a history of mixed business and residential premises, this should be continued.</p> <p>Barriers to delivery: Don't know</p>
84.	Natasha Waithe	<p>In what capacity are you responding to this consultation: I live in the local area</p> <p>Site Location: Greggs Bakery</p> <p>Type of Development: Housing</p> <p>Potential scale of development: the amount of flats and people area concern as we have a sever lack of parking and the streets are very narrow. I am concerned that the traffic increase will be too great for the all the narrow roads to handle. Also there doesn't appear to be any green space on the proposed plans.</p> <p>Site availability:</p> <p>Potential Constraints: I am concerned about the height of the flats. We were hoping to get rid of the looming factory towers from Green bakery but disappointingly the height of the proposed flats is worse.</p> <p>Barriers to delivery: Don't know. HGV access has already been already been stated as a restraint but the building work for 2 + years will mean a high increase of HGV's on the narrow surrounding streets.</p>
85.	Malcolm Hay	<p>In what capacity are you responding to this consultation: I live in the local area</p> <p>Site Location: Greggs Bakery site</p> <p>Type of Development: Housing</p> <p>Housing, and especially affordable housing, is in drastically short supply throughout the UK and the number of people being housed away from permanent homes is growing when it should be reducing. The Government has for many years had a target of 300,000 homes to be built per year and has fallen consistently short every year. Richmond must play its part.</p> <p>Barriers to delivery: Don't know</p>
86.	Hester Huttenbach	<p>In what capacity are you responding to this consultation: I live in the local area</p> <p>Site Location: Greggs Bakery site, Colne Road</p> <p>Type of Development: Leisure and Housing</p> <p>I approved the plans submitted but would like to see as much space left open as possible to trees, grass and shrubs. Maybe a small children play space.</p> <p>Potential scale of development: Living on the opposite side from the site I would not be affected by heights but i appreciate that the odd numbers are concerned about being overlooked. As the new houses would have a small garden it should not create a problem as these roads have always been back to backs and a certain lack of privacy has never been an issue (I have lived her for 35 years)</p> <p>Site availability: Hopefully the development will get the go ahead as it has been vacant for some considerable time.</p> <p>Barriers to delivery: Don't know</p>
87.	Clarissa Louise Angus	<p>In what capacity are you responding to this consultation: I live in the local area</p>

Respondent ref. no.	Name / Organisation	Detailed comments
		<p>Site Location: Green spaces Type of Development: Leisure Barriers to delivery: don't know</p>
88.	Defence Infrastructure Organisation on behalf of the Ministry of Defence	<p>In what capacity are you responding to this consultation: landowner Site Location: Kneller Hall, Kneller Road, Twickenham TW2 7DU Type of Development: Retail, Leisure, Cultural, Office, Housing & Other The site is the subject of Policy SA14 in the adopted Richmond Local Plan and is also the subject of a site specific development brief, the Kneller Hall Development Brief 2020. The site is suitable for a number of uses including residential. The site should be included in the new local plan. Potential scale of development: The potential development is described in Policy SA 14 and the potential scale of development and the amount of development and range of uses that the site can accommodate is described further in the development brief for the site. Site availability: Currently it is planned that the site will be available for development in 2021. Barriers to delivery: No. Not aware of any currently.</p>

Appendices:

- 2. CBRE on behalf of LGC Teddington
- 21. Lucy Wakelin, Transport for London Commercial Development
- 24. Paul Velluet
- 34. DP9 Ltd on behalf of Harlequin Football Club Limited
- 55. Jon Rowles
- 73. Pegasus Group on behalf of Sheen Lane Developments
- 74. Savills on behalf of Thames Water
- 75 (a) David Taylor
- 79. Max Hampton
- 82. Campbell Brown

Appendices to all responses received to the New Local Plan Call for Sites consultation
https://www.richmond.gov.uk/new_local_plan_direction_of_travel_engagement

Consultation from Monday 24 February to Sunday 5 April 2020
Published by LBRuT on 30 November 2020

Respondent reference no.	Name / Organisation
2	CBRE on behalf of LGC Ltd, Teddington
21	Lucy Wakelin, Transport for London (TfL) Commercial Development
24	Paul Velluet
34	DP9 Ltd on behalf of Harlequin Football Club Limited
55	Jon Rowles
73	Pegasus Group on behalf of Sheen Lane Developments
74	Savills on behalf of Thames Water
75	David Taylor
79	Max Hampton
82	Campbell Brown

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Drawing Title
LGC Estate

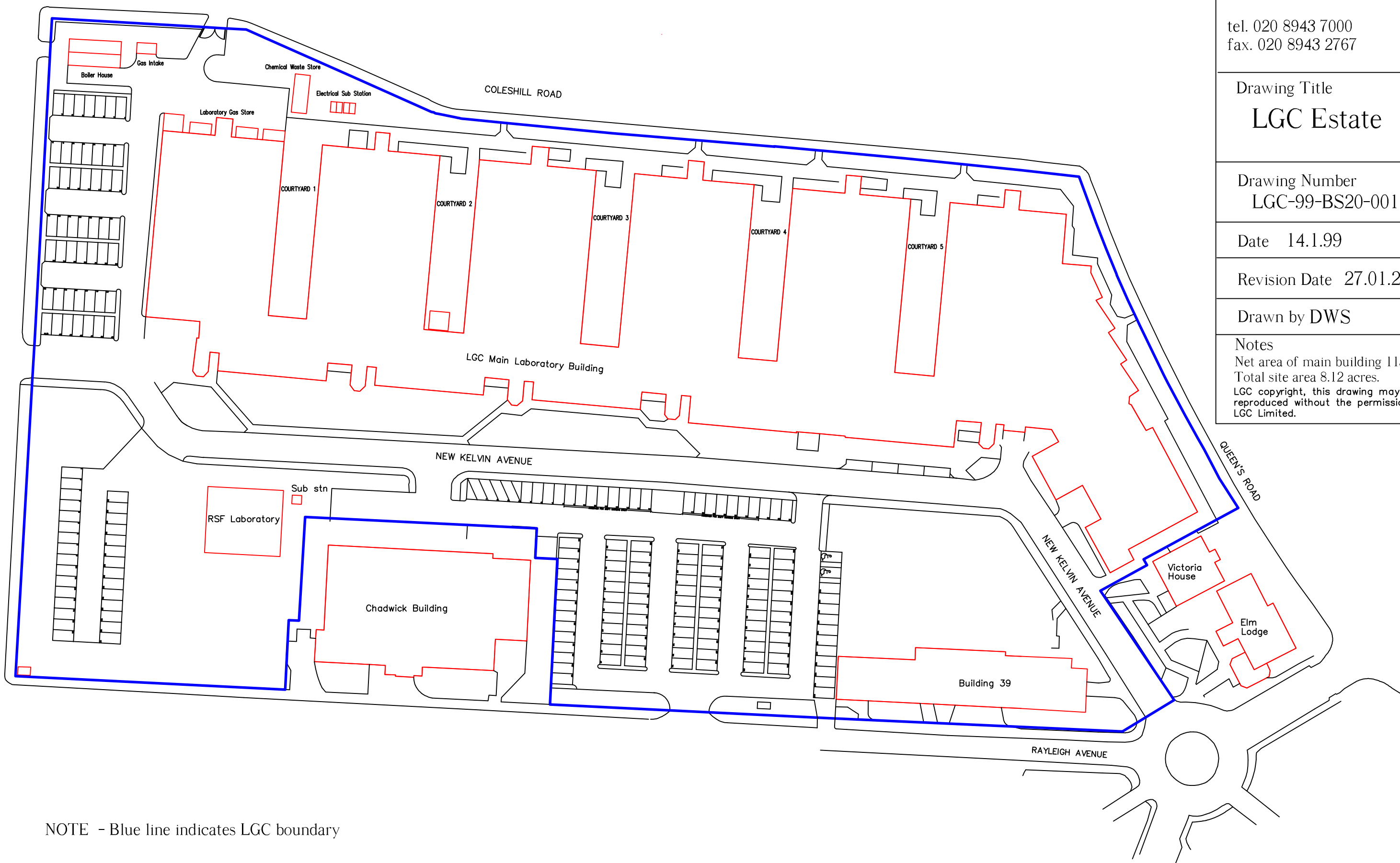
Drawing Number
LGC-99-BS20-001

Date 14.1.99

Revision Date 27.01.2016

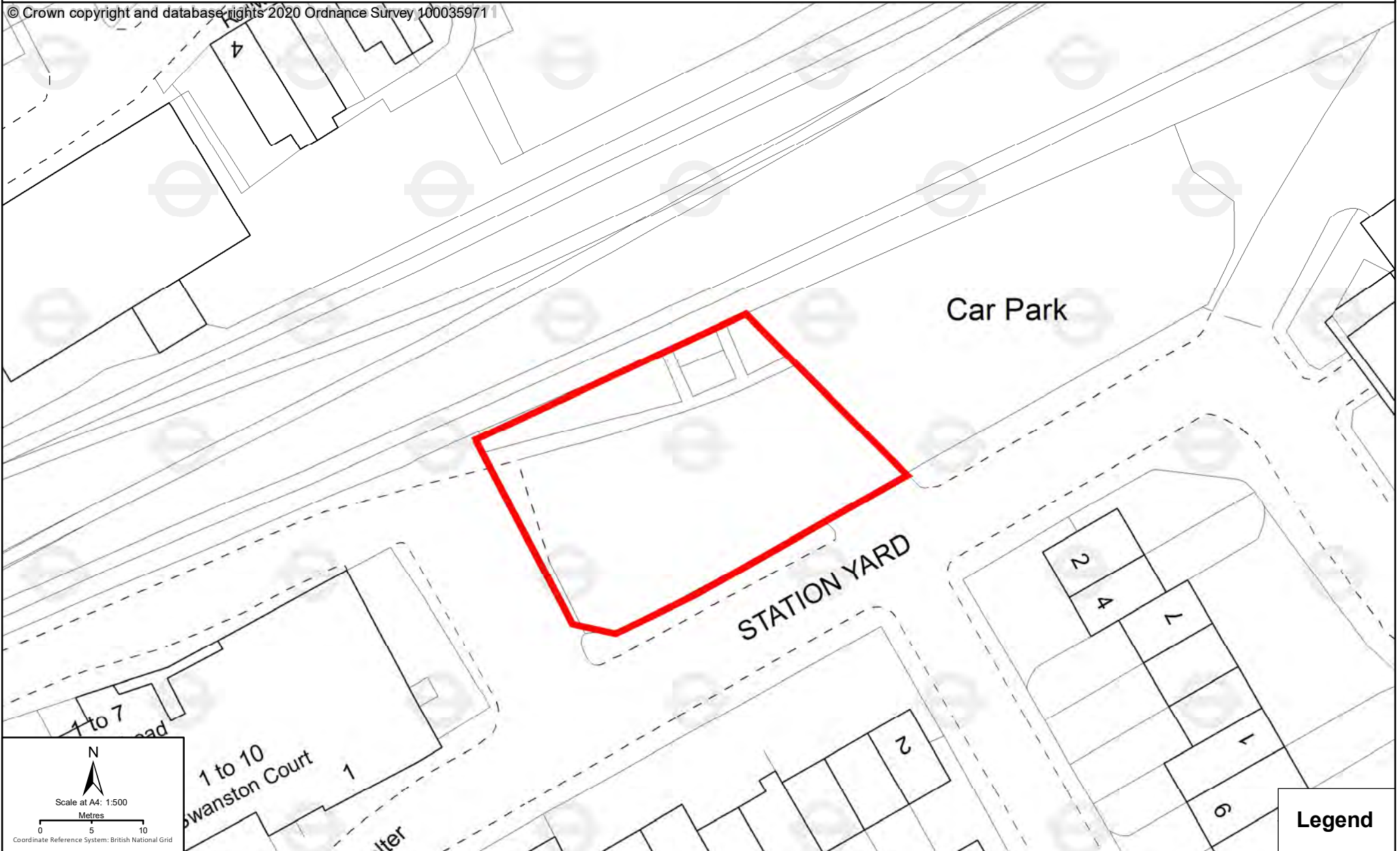
Drawn by DWS

Notes
Net area of main building 11500 m2.
Total site area 8.12 acres.
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NOTE - Blue line indicates LGC boundary

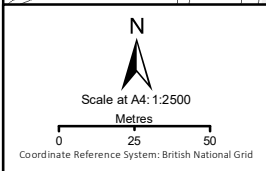
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Legend

Fullwell - TfL ownership

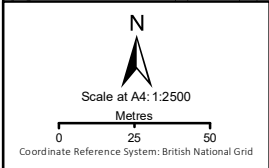
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Legend

Fullwell - comprehensive land ownership

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Legend

Respondent 24 - Paul Velluet

LONDON BOROUGH OF RICHMOND-UPON-THAMES LOCAL PLAN

A STATEMENT BY CHARTERED ARCHITECT AND BOROUGH RESIDENT, PAUL VELLUET, REGARDING SITE-SPECIFIC PROPOSAL SA 19 – RICHMOND STATION, RICHMOND, FOR PRESENTATION AT THE RELEVANT HEARING SESSION OF THE INSPECTOR'S EXAMINATION, SEPTEMBER, 2017

I. INTRODUCTION

- I.1 I am submitting this statement in an entirely independent capacity as a locally-based architect, as resident of the Borough since 1948 and as regular user of Richmond Station since September, 1962. I am a former Chairman of The Richmond Society and have recently been appointed as President of the Richmond Local History Society. I am a member of the RIBA's Awards Group and a former member of the RIBA's Planning Group. From 1991 until 2004, I worked as Regional Architect and Assistant Regional Director of English Heritage, London. In past years I have served on the Executive Committee of the Richmond Society and on the Richmond-upon-Thames Council's Conservation Areas Advisory Committee. I attach fuller particulars of my qualifications and experience in Appendix A.
- I.2 In this statement I convey my serious concern regarding the soundness of specific aspects of the Council's final (published) version of the *Richmond-upon-Thames Local Plan* relating to Richmond Station and its future – Site specific Proposal SA 19. My statement focuses on those aspects of the Council's *Plan* which I consider to be insufficiently robust in providing the Council, as local planning authority and the local community with effective control over development affecting the particular architectural, historic interest and significance of Richmond Station as 'a non-designated heritage asset', and the character, appearance and significance of the Central Richmond Conservation Area as 'a designated heritage asset' (in the terms commended in the relevant parts of the *National Planning Policy Framework*). My statement takes account of the formal advice on 'soundness' as explained in paragraph 182 of the *National Planning Policy Framework*.
- I.3 In Section 3 of this Statement, I set out my concerns about the soundness of specific aspects of the *Plan* relating Site-specific Proposal SA 19 - Richmond Station, Richmond. I explain the reasons for my concerns, and put forward my suggestion as to the potential means of addressing the weaknesses of the *Plan* as presently submitted and securing amendment which will contribute to providing a sounder definition of the Proposal insofar as is necessary to ensure that the particular interest and significance of Richmond Station as a non-designated heritage asset and the character, appearance and significance of the Central Richmond Conservation Area as a designated heritage asset will be assured. In setting forward these concerns, I would stress that I see no

objections to the incorporation of wording in the proposal statement referring to the provision of improved public transport interchange facilities on the site or to the potential redevelopment of the various post-war buildings to the immediate north and south of the original station-complex subject to the satisfactory scale and design.

2. THE BACKGROUND TO MY STATEMENT

- 2.1 This statement follows my representations in response to the Council's consultation on the final (publication) version of the *London Borough of Richmond-upon-Thames Local Plan* in relation to Site-specific Proposal SA 19 – Richmond Station, Richmond, submitted to the Council in February, 2017 – see copy attached as Appendix B. This, in turn, followed my formal response to the Council's consultation on *The First Draft of the London Borough of Richmond-upon-Thames Local Plan (Pre-publication version)* in relation to Site-specific Proposal SA 18, submitted to the Council in August, 2016 – see copy attached as Appendix C. A summary of this response was set out, with added comments by Council officers, in the Council's *Summaries of responses received in relation to the Local Plan policies and site allocations and Council's response*, reference 437.
- 2.2 The original frontage building of Richmond Station facing Kew Road containing the generously proportioned, upper concourse together with the circulation areas, platform-buildings and platform-canopies comprise a well-designed and coherent complex of sufficient special architectural and historic interest to merit statutory listing. Completed in 1937 the station complex was designed for the Southern Railway by the company's Architects Department under the direction of James Robb Scott (1882-1965) and connects sensitively to the surviving and very fine, 19th century platform-canopies serving island-platforms 4 and 5 and 6 and 7. The same architectural team designed the almost contemporary, grade II* listed Surbiton Station. Although parts of the station, in particular, the upper concourse, have lost some of their original features and detailing, sufficient original fabric and features remain to make full reinstatement entirely feasible. This would enable the original architectural integrity of the building to be recovered to leave the station in a similar condition as the fully restored listed station at Surbiton.
- 2.3 Having used the Station almost continuously since the early-1960s, together with many other Borough residents and visitors to Richmond, I value the distinctive architectural character and significance of the complex, its efficient layout, and above all, the platforms being day-lit and open to the sky and naturally ventilated.
- 2.4 Any new development spanning across and above some or all of the existing tracks and platforms of the station would not only seriously damage the architectural integrity of the existing station complex but would destroy the amenity presently

enjoyed by the travelling public. In addition and importantly, having been directly and professionally involved at the planning stages of the major development proposals above Victoria Station and Charing Cross Station, approved and implemented during the 1980s; in the development proposals above Fulham Broadway Station, approved and implemented in the 1990s; in the thankfully aborted development proposals above Paddington Station put forward in the 1990s; and, most recently, in the development proposals above the eastern Farringdon Cross-Rail/London Underground Interchange Station on Smithfield, now being implemented, I am entirely familiar with the issues raised by proposals for development above railway stations and of the impact of such developments when approved and implemented. I am also entirely familiar with the operational, logistical and cost challenges involved in seeking to develop above railway running-tracks and platforms, and of the potential need to provide significant commercial and other floor-space in such development in order to justify the additional costs incurred and to achieve a viable and profitable development for the prospective developer and the railway freeholder. Accordingly, in the light of such extensive and diverse experience, I view with particular concern the potentially damaging impact of seeking to span across the running-tracks and platforms at Richmond Station with substantially scaled development, as well as the other implications of redeveloping the station site.

- 2.5 I note that Richmond Station was rightly recommended for statutory listing by the Richmond Society in May, 1976, December, 1988, April, 1989 and 1998. (A copy of three pages of the 40-page report prepared by the Society in 1998 is attached as Appendix D). I am not aware that the case for listing has been addressed by English Heritage or Historic England since then, despite the significant changes to listing criteria since that time. Ironically, had the station complex been listed at this time, then many of the features and details that have been lost or adversely altered in the years since under the terms of 'permitted development' would have survived.
- 2.6 I also note that in July, 1997, English Heritage wrote to the architects for a potential redevelopment scheme for the entire station complex and adjoining sites further to a 'Planning Weekend' public consultation exercise recalling that two of the key principles which enjoyed overall support from those attending were the retention of the existing station frontage building and its effective integration into any new development; and the maintenance of full daylighting down to platform-level across all platforms, possibly within a fully glazed enclosure.
- 2.7 In my response to consultation on the *Draft Local Plan* in August, 2016, I suggested that the site specific proposal needed to be fundamentally reviewed and redrafted to provide for the retention and restoration of the entire Southern Railway station complex as completed in 1937 together with the surviving 19th century platform-canopies serving platforms 4 to 7, and the retention of the daylighting and natural ventilation of all the platforms. I note that in a submission to the Council by The

Twentieth Century Society, the group expressed great concern that the *Draft Local Plan* promoted the Station site for ‘comprehensive redevelopment’, stating that ‘given the architectural and historic importance of the building, as well as its clear townscape value within a conservation area... the draft as it stands runs counter to the guidance of the *NPPF* and to the guidance set out in the *Central Richmond Conservation Area Statement*, which specifically identifies development pressure as a problem, and which promotes the preservation, enhancement and reinstatement of architectural quality’, and urged that site-specific proposal SA 18 should be redrafted ‘in a way which encourages only conservation-led development which explicitly safeguards the retention and restoration of the 1937 station building’.

3. MY PARTICULAR CONCERNS

- 3.1 Whilst the addition of references to the location of the Station within a conservation area and to its designation as a *Building of Townscape Merit* in the relevant section of the Council’s final (publication) version of the *Local Plan* is to be welcomed, no justification whatsoever is provided for the Council’s assertion that ‘the Station is a key development site’ and that ‘there is a need for comprehensive redevelopment’ in order to deliver transport interchange improvement.
- 3.2 Importantly, the Council has failed to provide any assessment of the potential impact on the retail and business health of the remainder of the Town, on the amenity of its residents and visitors, and on the viability of existing cinemas in the Town that would result from providing ‘approximately 10 000 square metres of retail floor-space’, ‘substantial provision of employment floor-space, particularly BI offices’, ‘other uses, such as for community, leisure and entertainment’ and ‘housing in (sic) upper floors’. Similarly, the Council has failed to provide any assessment of the potentially damaging impact on the character and appearance of the conservation area and on traffic movement and car-parking in the Town that would result from the essential servicing requirements of such a vast multi-use development. Such omissions render the proposal as presently worded entirely unsound and unsustainable and in fundamental conflict with other policies of the Local Plan.
- 3.3 The statement that ‘any redevelopment (sic) proposal must be of the highest quality in character and respond positively to the Conservation Area’ is entirely inadequate in setting the necessary parameters for development of the site’ given the failure to refer to the need to provide for the retention and restoration of the entire Southern Railway station complex as completed in 1937 together with the surviving 19th century platform-canopies serving platforms 4 to 7, and the retention of the daylighting and natural ventilation of all the platforms, and the need to ensure that any new development should either preserve or enhance the character and appearance of the conservation area and sustain its significance.

- 3.4 Finally and importantly, as presently drafted, there is a failure to distinguish between the purpose-built railway station, which is clearly of particular architectural, historic and townscape significance and contributes to the particular character, appearance and significance of the Central Richmond Conservation Area, and the later, post-War, commercial buildings fronting The Quadrant and the Kew Road to each side of the main Station frontage (Westminster House and the shops below to the immediate north and Gateway House and the adjacent shops to the immediate south) and the multi-storey car-park on the southern side of the station complex, accessed from Drummond's Place, none of which possess any such significance and none of which contribute to the character, appearance or significance of the conservation area.
- 3.5 As presently drafted, the proposal reflects an alarming lack of recognition and understanding by the Council of the particular challenges and implications of designing, funding and delivering new development above railway running-tracks and platforms, and of the distinctive architectural and townscape interest and significance of the existing station-complex.
- 3.6 In the interests of clarity and consistency with the conservation and other relevant policies contained in the *National Planning Policy Framework*, the *London Plan*, and the emerging *Local Plan* and the need for a sound and sustainable statement of planning and conservation policy, I urge the Inspector to require the Council to fundamentally review and re-draft the existing the site-specific proposal, to take account of the key issues referred to above.

4. ADDITIONAL NOTE

- 4.1 I remain entirely willing to provide copies to the Inspector of any details about the history and development of the station and to clarify any of the issues I have raised in this submission. In addition, I would wish to encourage the Inspector to undertake a site inspection of the Station and its immediate setting in order to appreciate its considerable architectural and historic interest and significance as anon-designated heritage asset, and to recognise the need to ensure that sound policies are in place to ensure that such interest and significance will be effectively sustained in accordance with the relevant policies of the *National Planning Policy Framework*.
- 4.2 Finally, I would confirm that I recognise that the station was the subject of a Planning Brief drafted and adopted by the Council in March, 2002 and Site Specific Proposal R 6 in earlier local plans. However, I would observe that these contained significant and fundamental deficiencies similar to those contained in the emerging Local Plan.

Paul Velluet

7th September, 2017.

APPENDIX A – PAUL VELLUET, QUALIFICATIONS AND EXPERIENCE

Paul Velluet is a chartered architect - a member of both the RIBA and the Institute of Historic Building Conservation - with experience drawn from over thirty-five years working in both private practice and the public sector specialising in building conservation and development in historic areas. He holds B.A. Honours, B. Arch. Honours and Master of Letters degrees from the University of Newcastle-upon-Tyne.

Since 2005, he has headed an independent consultancy specialising in the provision of professional and technical advice to property owners, prospective developers and other planning and building professionals on projects involving new development in historic areas and the conservation, alteration and extension of historic buildings, particularly at the critical pre-planning and planning stages. The consultancy undertakes work for commercial, educational, residential, cultural, diplomatic, church, health-sector, hospitality-sector, urban and rural-estate and local planning authority clients, including the City of London Corporation and the City of Westminster Council. Clients have also included historic building trusts and local amenity and community groups in addition to the historic London estates.

Paul Velluet's professional experience includes working as a project architect with architects Manning Clamp + Partners, Richmond, Surrey, 1972-1975; as a Principal Urban and Design and Conservation Officer in Westminster City Council's Department of Planning and Transportation, 1976-1991; as Regional Architect and Assistant Regional Director, English Heritage London Region, 1991-2004; and as Senior Associate, Conservation and Planning, with the major Central London commercial practice HOK Architects, 2005-2011. During these years, he has been professionally responsible for projects which have been recognised with a *European Architectural Heritage Year (Civic Trust) Award*, a *Commendation under the R.I.B.A. Awards*, and awards and commendations under local awards schemes in south-west London. He has also been an exhibitor in the Architecture Room of the Royal Academy of Arts Annual Summer Exhibitions.

Currently he serves as a member of the RIBA's Awards Group; a member of the Archdiocese of Westminster Historic Churches Committee; and a member of the Guildford Cathedral Fabric Advisory Committee. In past years he has served on the Executive Committee of the Society of Architectural Historians of Great Britain, the RIBA's Planning Group, the Royal Fine Art Commission's Thames Landscape Strategy Panel, the Cathedrals Fabric Commission for England, the Cathedrals Fabric Commission's Technical Group, and the Richmond Society's Executive Committee. For twenty years he served as a Trustee of the Covent Garden Area Trust, and for five years as an assessor for the RIBA/Crown Estate's Annual Conservation Awards.

He has been a contributor to various publications, journals and guidance including: *Context: New buildings in historic settings* (The Architectural Press, 1998); *The Buildings of England, London 2: South* (1983), and *The Buildings of London, London 6: Westminster* (2003); *The Architects' Journal*, *Planning in London*, *Urban Design Quarterly*, *English Heritage's Conservation Bulletin*, *Church Building* and *Ecclesiology Today*; and diverse policy and guidance documents for Westminster City Council and English Heritage.

APPENDIX B

CONSULTATION ON THE FINAL VERSION OF THE LONDON BOROUGH OF RICHMOND-UPON-THAMES LOCAL PLAN (PUBLICATION)

REPRESENTATION BY PAUL VELLUET, CHARTERED ARCHITECT, IN RELATION TO SITE-SPECIFIC PROPOSAL SA 19 - RICHMOND STATION, RICHMOND

FEBRUARY, 2017

This representation follows my formal response to consultation on *The First Draft of the London Borough of Richmond-upon-Thames Local Plan (Pre-publication version)* in relation to Site-specific proposal SA 19 – Richmond Station, Richmond, submitted in August, 2016. A summary of my response is set out in the Council's *Summaries of responses received in relation to the Local Plan policies and site allocations and Council's response*, reference 437.

This representation takes account of the formal advice on 'soundness' as explained in paragraph 182 of the *National Planning Policy Framework*.

In my response to consultation on the *Draft Local Plan* last August, I stated:

'The original frontage building of the Station facing Kew Road containing the generously proportioned upper concourse together with the circulation areas, platform-buildings and platform-canopies comprise a well-designed and coherent complex of sufficient special architectural and historic interest to merit statutory listing. Completed in 1937 the station complex was designed for the Southern Railway by the company's Architects Department under the direction of James Robb Scott (1882-1965) and connects sensitively to the surviving and very fine, 19th century platform-canopies serving island-platforms 4 and 5 and 6 and 7. The same architectural team designed the almost contemporary, grade II* listed Surbiton Station.

Having used the Station almost continuously since the early-1960s, together with many other Borough residents and visitors to Richmond, I value the distinctive architectural character and significance of the complex, its efficient layout, and above all, the platforms being day-lit and open to the sky and naturally ventilated. Any development taken across and above some or all of the existing tracks and platforms would not only seriously damage the architectural integrity of the existing station complex but would destroy the amenity presently enjoyed by the travelling public. Accordingly, the proposal as presently envisaged under SA 18 is not only totally unacceptable, but runs against the relevant policies contained in the *National Planning Policy Framework* and the Council's existing and emerging conservation and other policies.

I should add the Station was rightly recommended for statutory listing by The Richmond Society in May, 1976 and again in December, 1988 and April, 1989. I am not aware that the case for listing has been addressed by English Heritage or Historic England since then. In July, 1997, English Heritage wrote to the architects for a potential redevelopment scheme for the entire station complex and adjoining sites in further to a 'Planning Weekend' public

consultation exercise recalling that two of the key principles which enjoyed overall support from those attending were the retention of the existing station frontage building and its effective integration into new development; and the maintenance of full daylighting down to platform-level across all platforms, possibly within a fully glazed enclosure.

In my response to consultation on the *Draft Local Plan* last August, I suggested that the project needed to be fundamentally reviewed and redrafted to provide for the retention and restoration of the entire Southern Railway station complex as completed in 1937 together with the surviving 19th century platform-canopies serving platforms 4 to 7, and the retention of the daylighting and natural ventilation of all the platforms. I note that in a submission to the Council by The Twentieth Century Society, it expressed great concern that the *Draft Local Plan* promoted the Station site for 'comprehensive redevelopment', stating that 'given the architectural and historic importance of the building, as well as its clear townscape value within a conservation area... the draft as it stands runs counter to the guidance of the *NPPF* and to the guidance set out in the *Central Richmond Conservation Area Statement*, which specifically identifies development pressure as a problem, and which promotes the preservation, enhancement and reinstatement of architectural quality', and urged at site-specific proposal SA 18 should be redrafted 'in a way which encourages only conservation-led development which explicitly safeguards the retention and restoration of the 1937 station building'.

Whilst the addition of references to the location of the Station within a conservation area and to its designation as a *Building of Townscape Merit* is to be welcomed, no justification whatsoever is provided for the Council's assertion that 'the Station is a key development site' and that 'there is a need for comprehensive redevelopment' in order to deliver transport interchange improvement. The Council has not provided any assessment of the potential impact on the retail and business health of the remainder of the Town, on the amenity of its residents and visitors, and on the viability of existing cinemas in the Town that would result from providing 'approximately 10 000 square metres of retail floor-space', 'substantial provision of employment floor-space, particularly BI offices', 'other uses, such as for community, leisure and entertainment' and 'housing in (sic) upper floors'. Similarly, the Council has not provided any assessment of the potentially damaging impact on the character and appearance of the conservation area and on traffic movement and car-parking in the Town that would result from the essential servicing requirements of such a vast multi-use development. Such omissions render the proposal as presently worded entirely unsound and unsustainable.

The statement that 'any redevelopment (sic) proposal must be of the highest quality in character and respond positively to the Conservation Area' is entirely inadequate in setting the necessary parameters for development of the site' given the failure to refer to the need to provide for the retention and restoration of the entire Southern Railway station complex as completed in 1937 together with the surviving 19th century platform-canopies serving platforms 4 to 7, and the retention of the daylighting and natural ventilation of all the

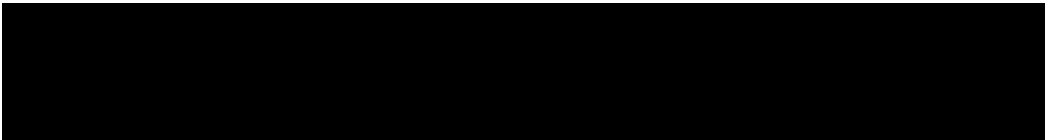
platforms, and the need to ensure that any new development should either preserve or enhance the character and appearance of the conservation area and sustain its significance.

Finally and importantly, as presently drafted, there is a failure to distinguish between the purpose-built railway station, which is clearly of particular architectural, historic and townscape significance, and the later, post-War commercial buildings fronting The Quadrant and the Kew Road to each side of the main Station frontage and the multi-storey car-park on the southern side of the station complex which possess no such significance.

In the interests of clarity and consistency with the conservation and other relevant policies in the *National Planning Policy Framework*, the *London Plan*, and the emerging *Local Plan* and the need for a sound and sustainable statement of planning and conservation policy, the existing the site-specific proposal needs to be fundamentally reviewed and redrafted.

Paul Velluet

15th February, 2017.



APPENDIX C

LONDON BOROUGH OF RICHMOND-UPON-THAMES DRAFT LOCAL PLAN: PRE-PUBLICATION VERSION FOR CONSULTATION

A RESPONSE FROM PAUL VELLUET, CHARTERED ARCHITECT AND RESIDENT OF ST MARGARET'S

SITE ALLOCATIONS – SA 18 RICHMOND STATION, RICHMOND

AUGUST, 2016

I write as a locally-based architect, a resident of the Borough since 1948 and as a former Chairman of The Richmond Society. I am a member of the RIBA's Awards Group, a former Assistant Director of English Heritage London Region and a former member of the Richmond-upon-Thames Council's Conservation Areas Advisory Committee.

I wish to raise fundamental objections to proposal SA 18 as presently drafted.

The original frontage building of the Station facing Kew Road containing the generously proportioned upper concourse together with the circulation areas, platform-buildings and platform-canopies comprise a well-designed and coherent complex of sufficient special architectural and historic interest to merit statutory listing. Completed in 1937 the station complex was designed for the Southern Railway by the company's Architects Department under the direction of James Robb Scott (1882-1965) and connects sensitively to the surviving and very fine, 19th century platform-canopies serving island-platforms 4 and 5 and 6 and 7. The same architectural team designed the almost contemporary, grade II* listed Surbiton Station.

Having used the Station almost continuously since the early-1960s, together with many other Borough residents and visitors to Richmond, I value the distinctive architectural character and significance of the complex, its efficient layout, and above all, the platforms being day-lit and open to the sky and naturally ventilated. Any development taken across and above some or all of the existing tracks and platforms would not only seriously damage the architectural integrity of the existing station complex but would destroy the amenity presently enjoyed by the travelling public. Accordingly, the proposal as presently envisaged under SA 18 is not only totally unacceptable, but runs against the relevant policies contained in the *National Planning Policy Framework* and the Council's existing and emerging conservation and other policies.

The project needs to be fundamentally reviewed and redrafted to provide for the retention and restoration of the entire Southern Railway station complex as completed in 1937 together with the surviving 19th century platform-canopies serving platforms 4 to 7, and the retention of the daylighting and natural ventilation of all the platforms.

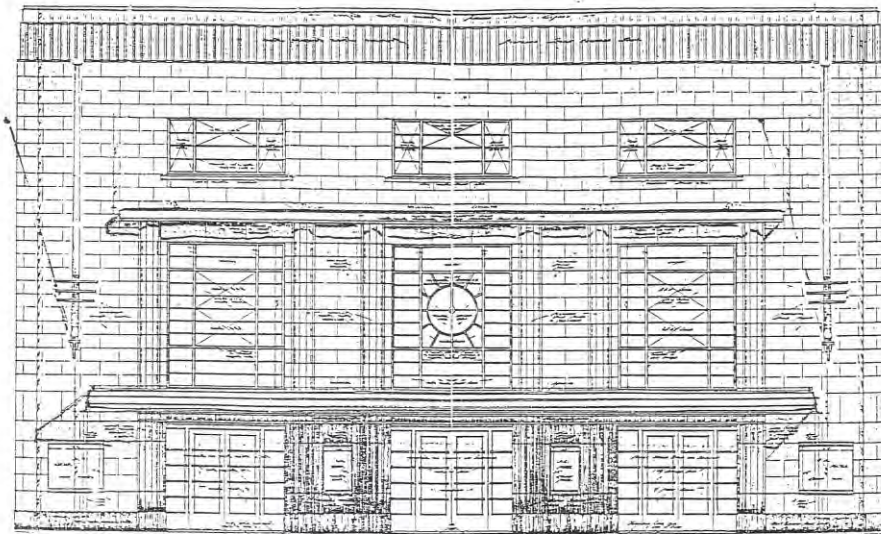
Paul Velluet, M.Litt., RIBA, IHBC, Chartered Architect



APPENDIX D – PAGES FROM THE RICHMOND SOCIETY'S 1998 REPORT

Rec. 1
21.V.01

RICHMOND STATION
Southern Railways 1937



Extract from working drawing for Richmond Station

An Illustrated Architectural and Historical View of the station
prepared in 1998 by



THE RICHMOND SOCIETY

The objectives of this report are:

To provide a brief history of the station and to illustrate the details of architectural interest in the building.

The report compares the station with other railway examples designed and constructed between the wars (1918 - 1939)

Contents

Introduction to the Report	5
A brief history of the station's origins	7
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Southern Region (later period)	
London Passenger Transport Board	
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Endnotes and Biographical notes.	38

The report is illustrated with photographs and key drawings as follows;

Extract from the Ordnance Survey map dated 1933
Plan of Station dated 1936
Elevations and Sections extracted from the original drawings
Notes and Photographs from The Builder and
The National Railway Museum Archive.

Introduction to the Report

This report has been prepared by the Richmond Society as a factual historical and architectural appraisal of Richmond Station. It has been made as comprehensive as possible by reference both to direct archival material and to the wider context of other contemporary examples which influenced its design.

The instigation of this study has been prompted by the scheme proposals from Railtrack PLC and their first appointed partnership developer to redevelop the whole of the Station's five hectare site. The nub of Railtrack's initial invitation brief to developers was that an improved station environment and integrated transport interchange were to be supported by a major commercial, retail and office development.

As regards the existing station buildings, it appears from the outset that their retention was not envisaged. The brief from Railtrack stated that the provision of a new station concourse including station retail, ticket and travel office would be a "likely" element of the targeted major development scheme.

The plan subsequently prepared by the Trevor Osborne Group indeed adopted a "clean sweep" approach. Any suggestions that (e.g.) the Booking Hall entrance building might be considered for incorporation in a redevelopment were flatly turned down.

The Richmond Society believes evaluation of the existing buildings to be an essential factor in any consideration of plans for the Station site and that this has not been done. The purpose of this report is to remedy this omission and provide to all concerned with the context of present or future schemes for the site, a factual account of the historical and architectural development of the station buildings. An appreciation of the worth and significance of the station is, we believe, essential to recommendations for its future.

Respondent 34 - DP9 Ltd OBO Harlequin Football Club Ltd

Indicative Site Plan



Sketch views of the proposed new neighborhood



Karakusevic Carson Architects



Karakusevic Carson Architects

Sketch views of the proposed new neighborhood



Karakusevic Carson Architects



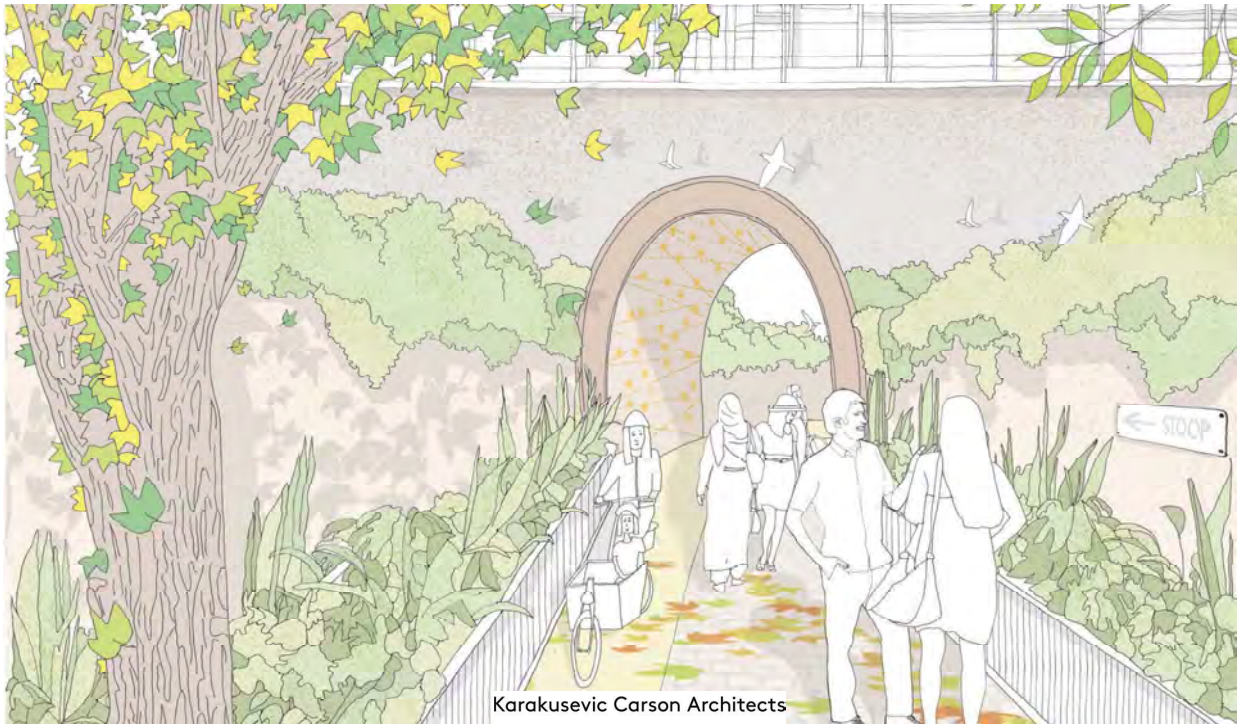
Karakusevic Carson Architects

Sketch view of proposed new bridge over the Duke of Northumberland River



Karakusevic Carson Architects

Existing railway underpass improvements



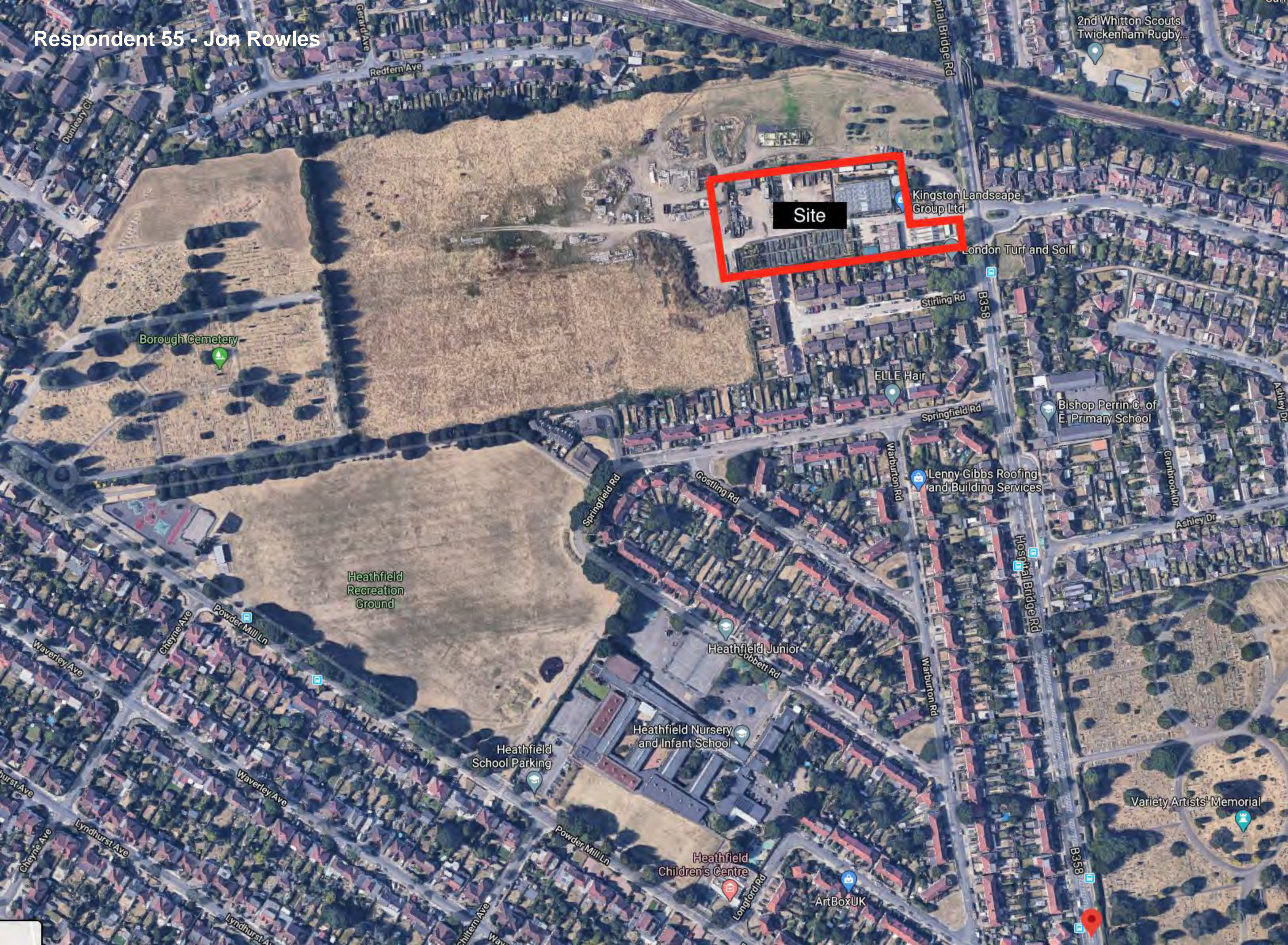
Karakusevic Carson Architects



Harlequins Indicative Ownership Boundary

LBURT Indicative Ownership Boundary

Respondent 55 - Jon Rowles



Site

Kingston Landscape Group Ltd

London Turf and Soil

Borough Cemetery

ELLE Hair

Bishop Perrin C. of E. Primary School

Lenny Gibbs Roofing and Building Services

Heathfield Recreation Ground

Heathfield Junior

Heathfield Nursery and Infant School

Heathfield School Parking

Heathfield Children's Centre

ArtBoxUK

Variety Artists' Memorial



ANNEX 1

DESIGN CONSTRAINTS AND OPPORTUNITIES

PLANNING | DESIGN | ENVIRONMENT | ECONOMICS

10 Albemarle Street | London | W1S 4HH

T 020 3897 1110 | W www.pegasusgroup.co.uk













Birmingham | Bracknell | Bristol | Cambridge | Cirencester | East Midlands | Leeds | Liverpool | London | Manchester

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Design process

3.1 Design constraints

Key:

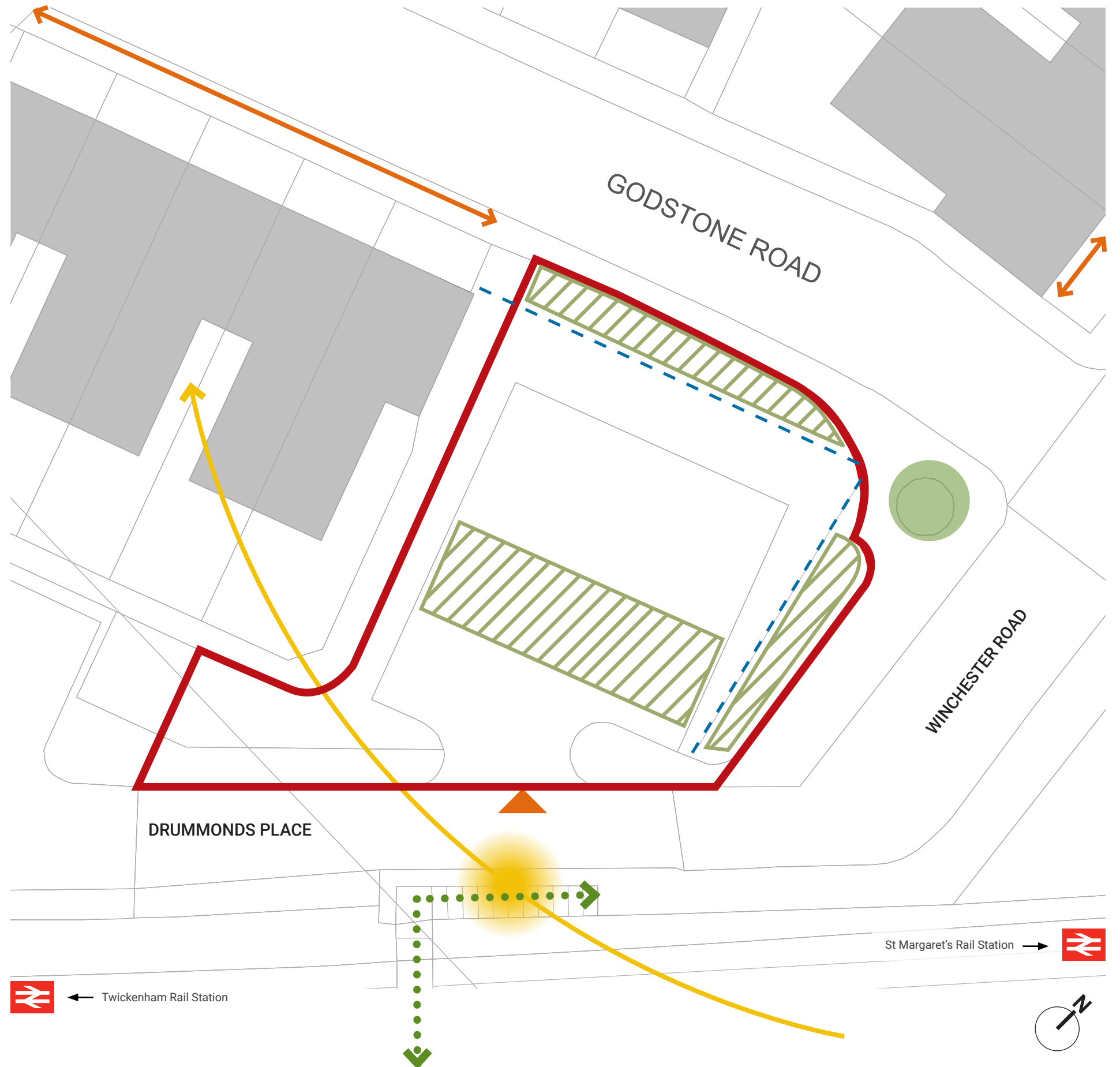
-  Site boundary
-  Surrounding building heights (2–3 storey housing)
-  Sun path
-  Proximity
-  Overlooking
-  Pedestrian link to rail station
-  Railway lines
-  Existing crossover
-  Mature planting
-  Existing footpath
-  Existing BT telecoms box
-  Flood zone 2



3.2 Design opportunities

Key:

- Site boundary
- ← Sun path
- - Opportunity to continue existing building line
- ↔ Maisonettes
- ↔ Pedestrian link to rail station
- ▲ Retain existing site access
- Mature planting
- ▨ Opportunity for garden space
- 🚉 Direction of rail station



ANNEX 2

TOWNHOUSE SKETCH PROPOSALS (4 UNITS)

PLANNING | DESIGN | ENVIRONMENT | ECONOMICS

10 Albemarle Street | London | W1S 4HH

T 020 3897 1110 | W www.pegasusgroup.co.uk

Birmingham | Bracknell | Bristol | Cambridge | Cirencester | East Midlands | Leeds | Liverpool | London | Manchester

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4.1 Summary of housing schemes

Total units

Houses	4
Parking spaces	2
Cycle spaces	8

Mix

3 Bed house	1 (25%)
3 Bed wheelchair adaptable house	1 (25%)
4 Bed house	2 (50%)

Gross areas

Residential NIA	529 sqm (5,694 sqft)
Residential GIA	540 sqm (5,812 sqft)
Residential GEA	625 sqm (6,727 sqft)

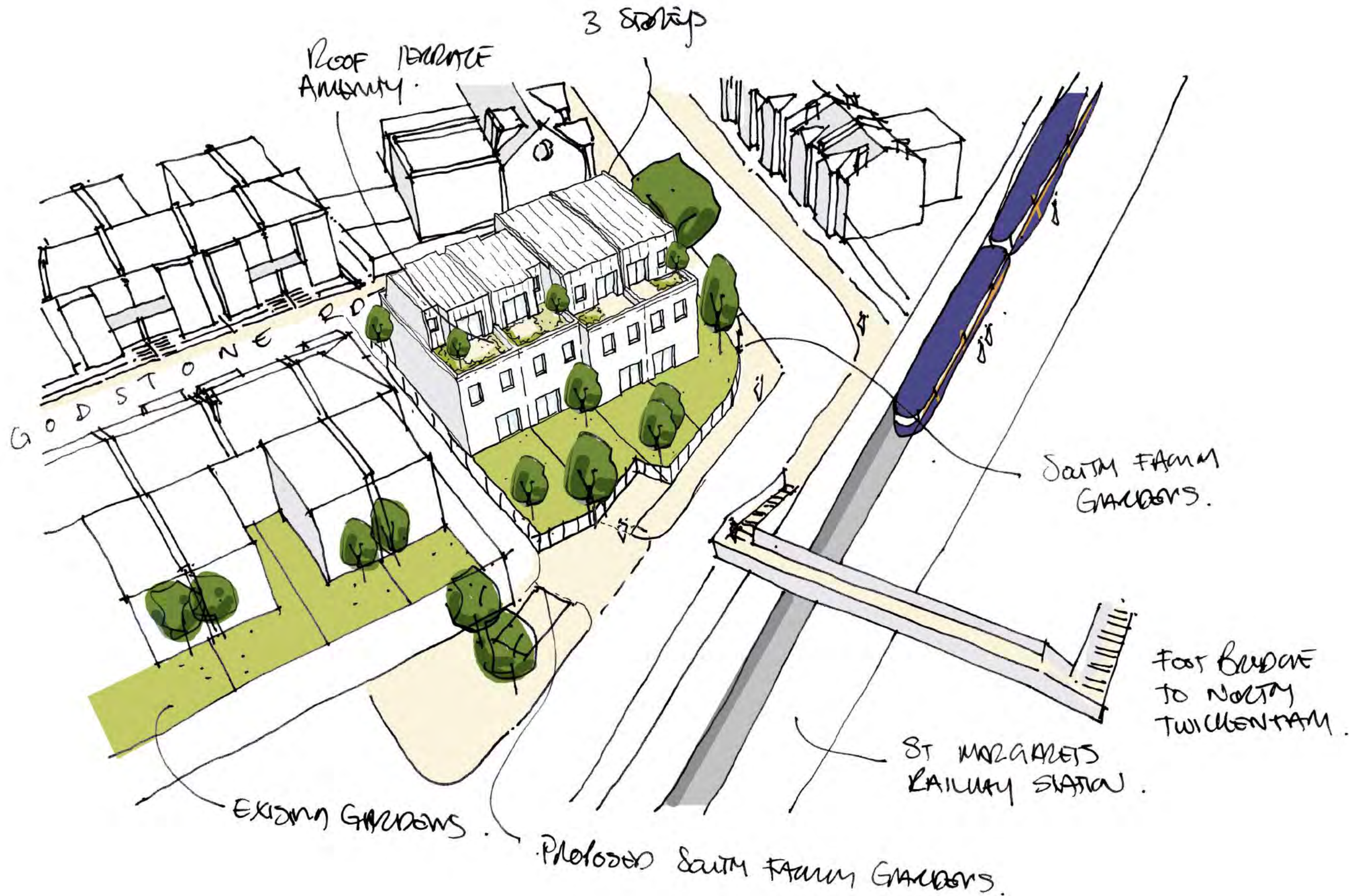
Massing and height

- All houses are at 3 storey with a mansard roof at the second floor. The massing reflects the frontages along Godstone Road, providing small front gardens and larger south facing gardens to the rear.
- The 3 bed dwellings' roofs step back to mirror heights along Godstone Road, whereas the 4 bed houses react to the 3 storey corner arrangement opposite.

Considerations

- Root protection zone for mature tree outside of site boundary to be considered.
- Retention of existing mature trees to be considered if viable - arboricultural survey to advise
- Opportunity for on site parking is limited to 2 spaces to maximise south facing gardens. One space per dwelling is called off within the draft London plan. Could additional spaces come forward with the wider proposals for St Margaret's Business Centre or permits be used for residents? Current Godstone Road residents parking is on street.
- Existing cross-over remodelled.
- Red line boundary is based on the marketing brochure provided by CBRE. To be confirmed if study is taken further.
- A measured site survey will be required
- The scheme meets the Richmond amenity space guidance as set out in Supplementary Planning Document Residential Development Standards 2010.





ANNEX 3

FLATTED SKETCH PROPOSALS (**8** UNITS)

PLANNING | DESIGN | ENVIRONMENT | ECONOMICS

10 Albemarle Street | London | W1S 4HH

T 020 3897 1110 | W www.pegasusgroup.co.uk

Birmingham | Bracknell | Bristol | Cambridge | Cirencester | East Midlands | Leeds | Liverpool | London | Manchester

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4.2 Summary of apartment scheme

Total units

Apartments	8
Parking spaces	5
Cycle spaces	16

Mix

1 Bed units	3 (38%)
2 Bed units	4 (50%)
2 Bed Wheelchair accessible unit	1 (12%)

Gross areas

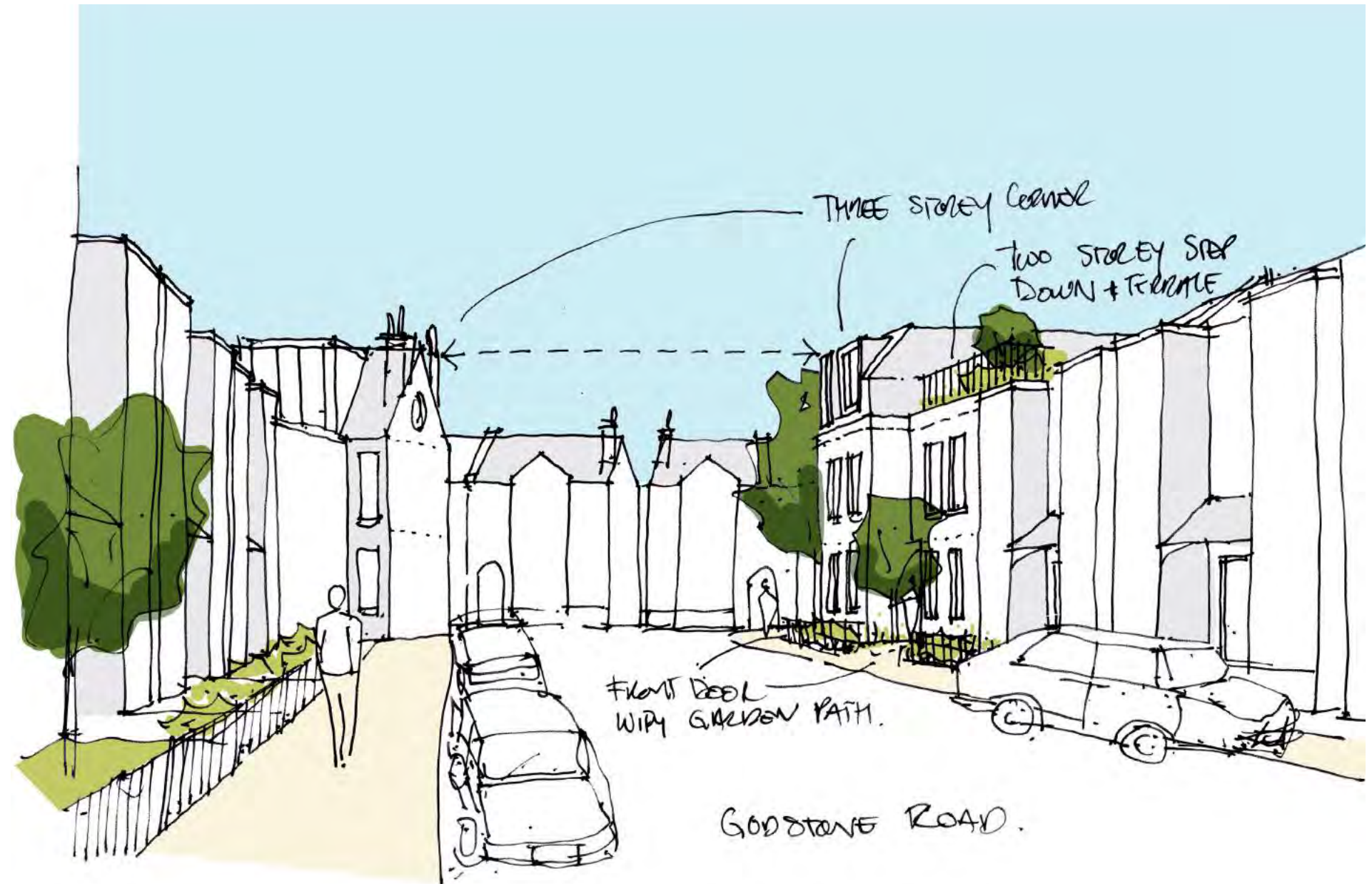
Residential NIA	511 sqm (5,500 sqft)
Residential GIA	587 sqm (6,318 sqft)
Residential GEA	680 sqm (7,319 sqft)

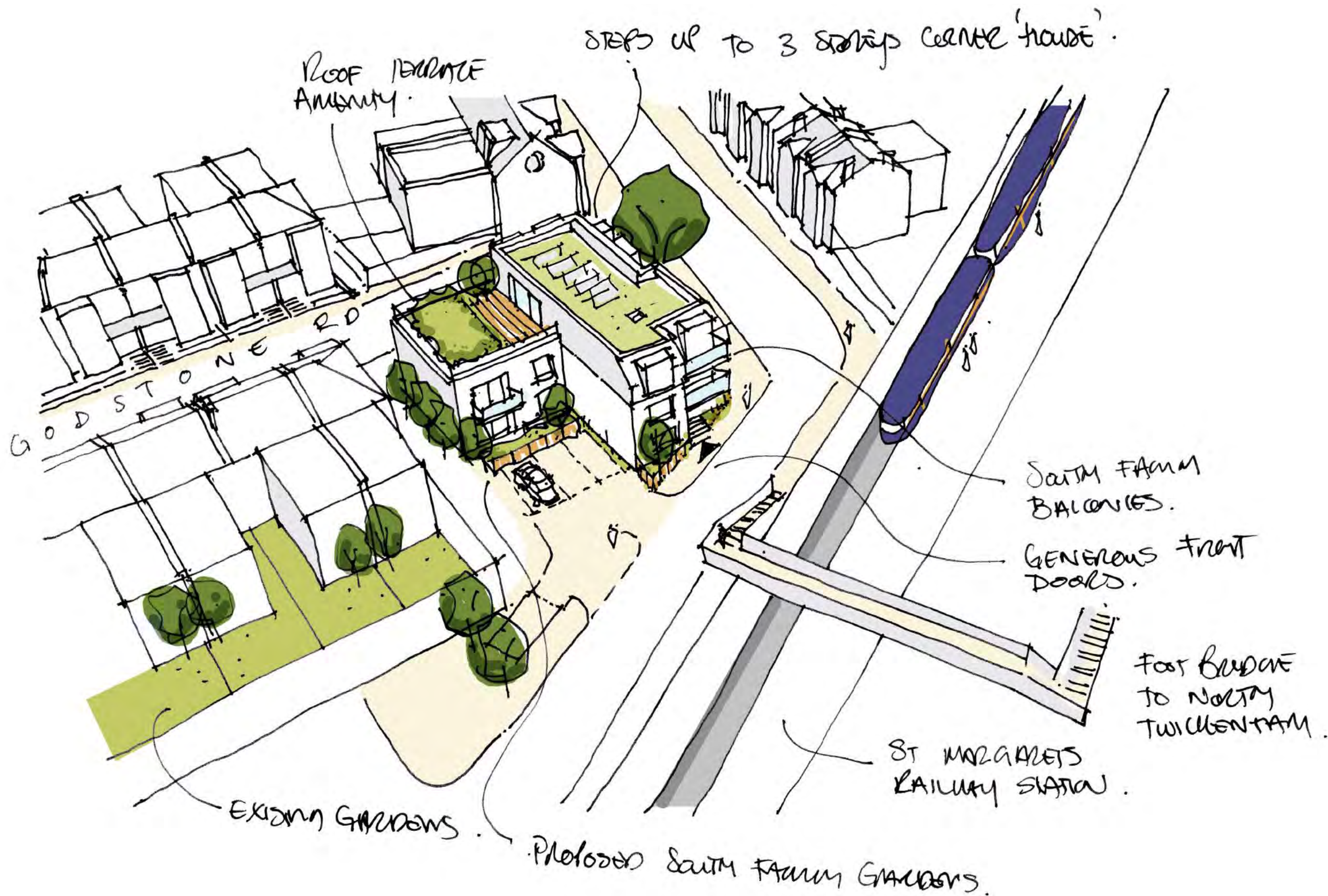
Massing and height

- A lower two storey element responds to the existing streetscape along Godstone Road.
- The massing steps up to three storeys on the corner, mirroring the height of the pitched roof corner building opposite.

Considerations

- Root protection zone for mature tree outside of site boundary to be considered.
- Opportunity for on site parking is limited. One space per dwelling is called off within the draft London plan. Could additional spaces come forward with the wider proposals for St Margaret's Business Centre?
- Existing cross-over remodelled.
- Red line boundary is based on the marketing brochure provided by CBRE. To be confirmed if study is taken further.
- A measured site survey will be required
- The scheme meets the Richmond amenity space guidance as set out in Supplementary Planning Document Residential Development Standards 2010.





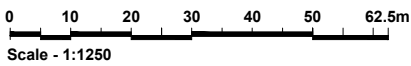
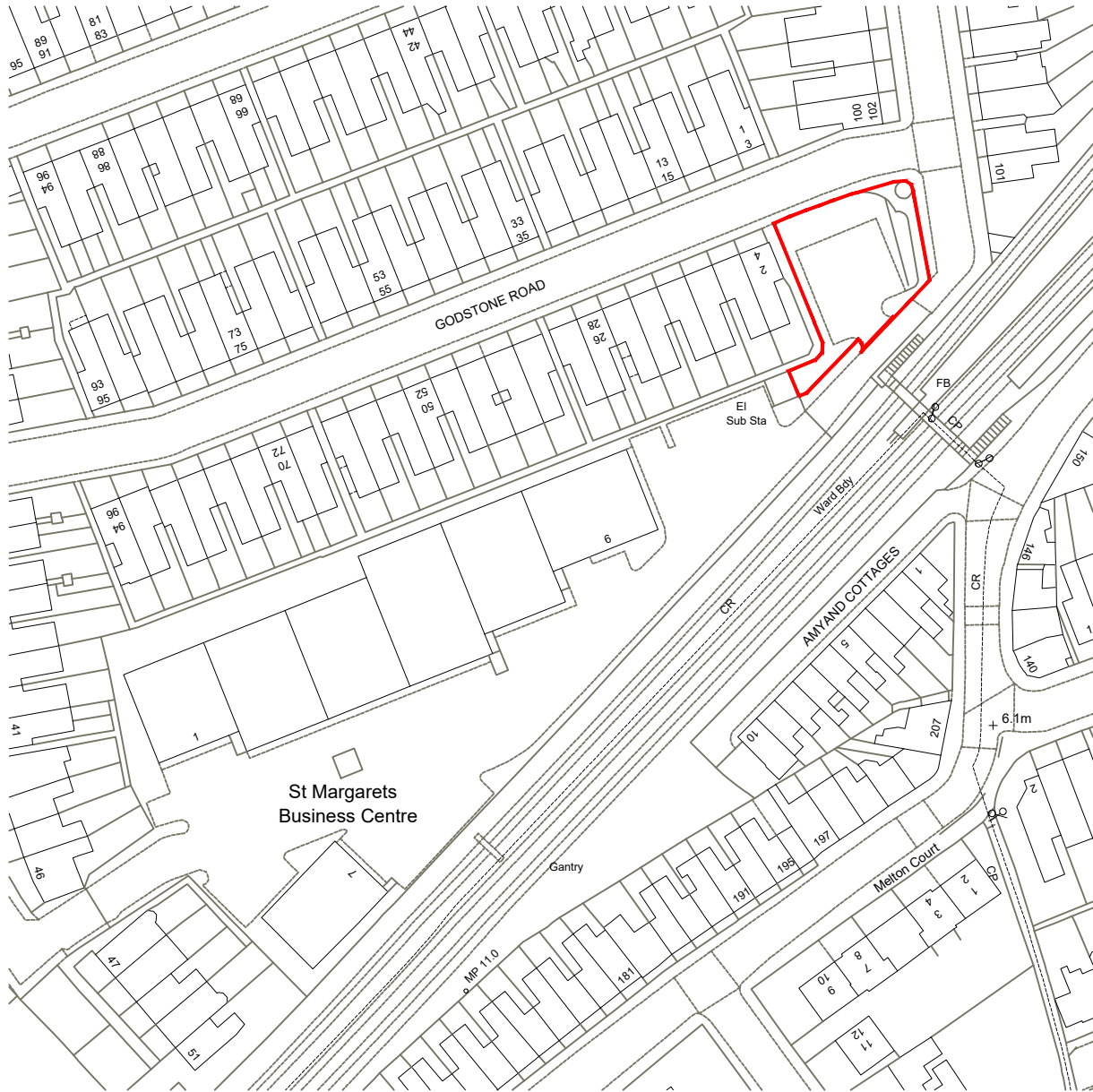
Layouts shown were supplied by a 3rd party; Workman LLP therefore take no responsibility for the accuracy or information taken from them.



NB Responsibility is not accepted for errors made by others scaling from this drawing. All construction information should be taken from figured dimensions only

A4

Site Location Plan



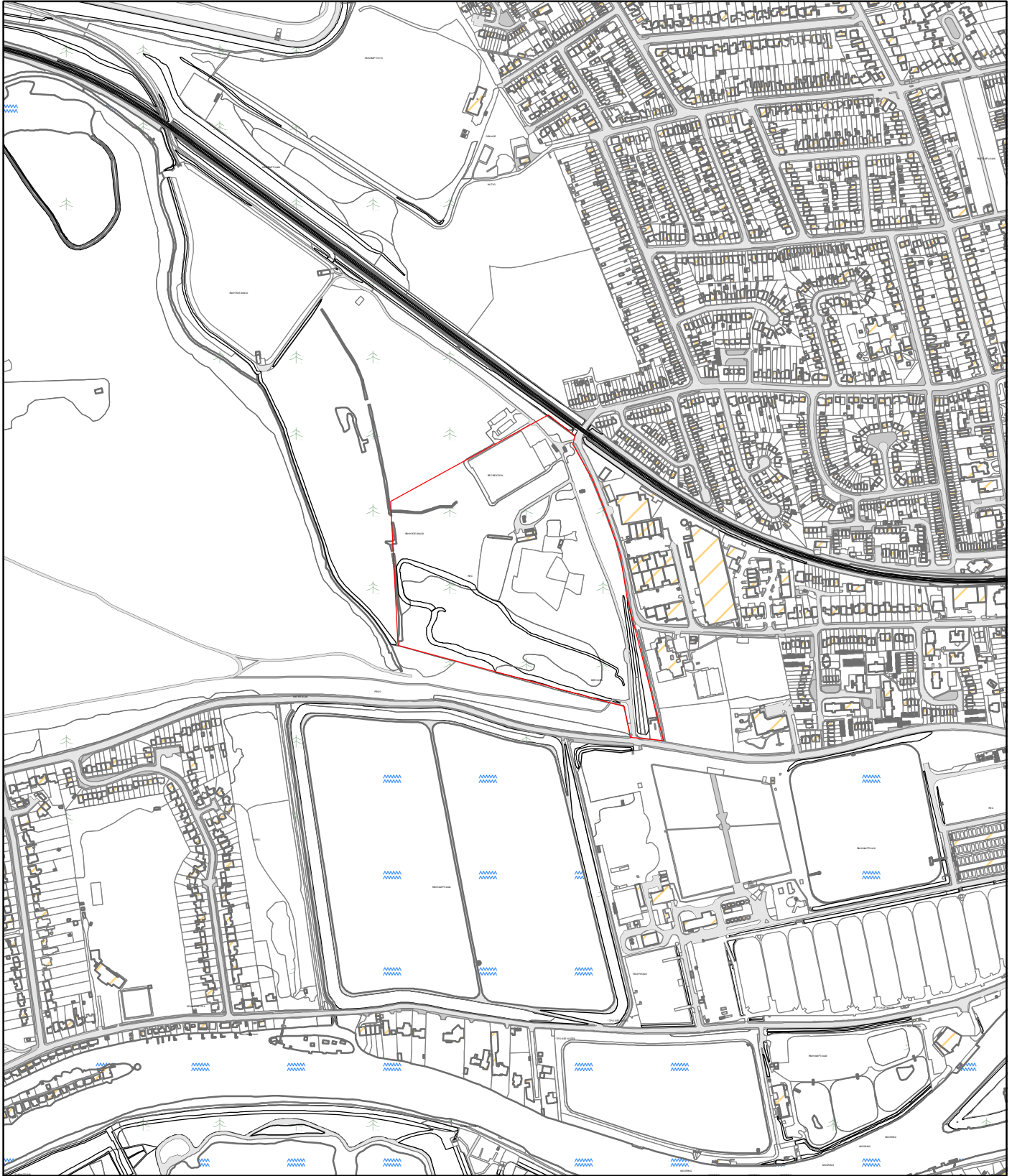
DRAFT

Rev	Description	By	Date

Project ST MARGARETS BUSINESS PARK, TWICKENHAM, TW1 1JN	Drawn by DRF	Surveyor GRC	Date FEB 2020
Client PPF REAL ESTATE NOMINEE 1 LTD	Scale 1:1250 @ A4		
Title SITE LOCATION PLAN	Drawing Number L192301-D09-001	Revision	



Hydes Field Location Plan, Hampton WTW



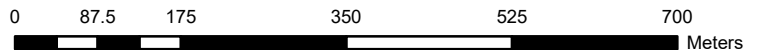
Thames Water
Map



Printed By : mhazeldi
 Print Date : 28/02/2020
 Map Centre On: 512447, 169882
 Centre Tile No. : TQ1269NW

Comments:

At scale at A4



Current Scale : 1:8,000

Disclaimer: Based on the Ordnance Survey Map with the Sanction of the Controller of H.M Stationery Office License Number- 100019345

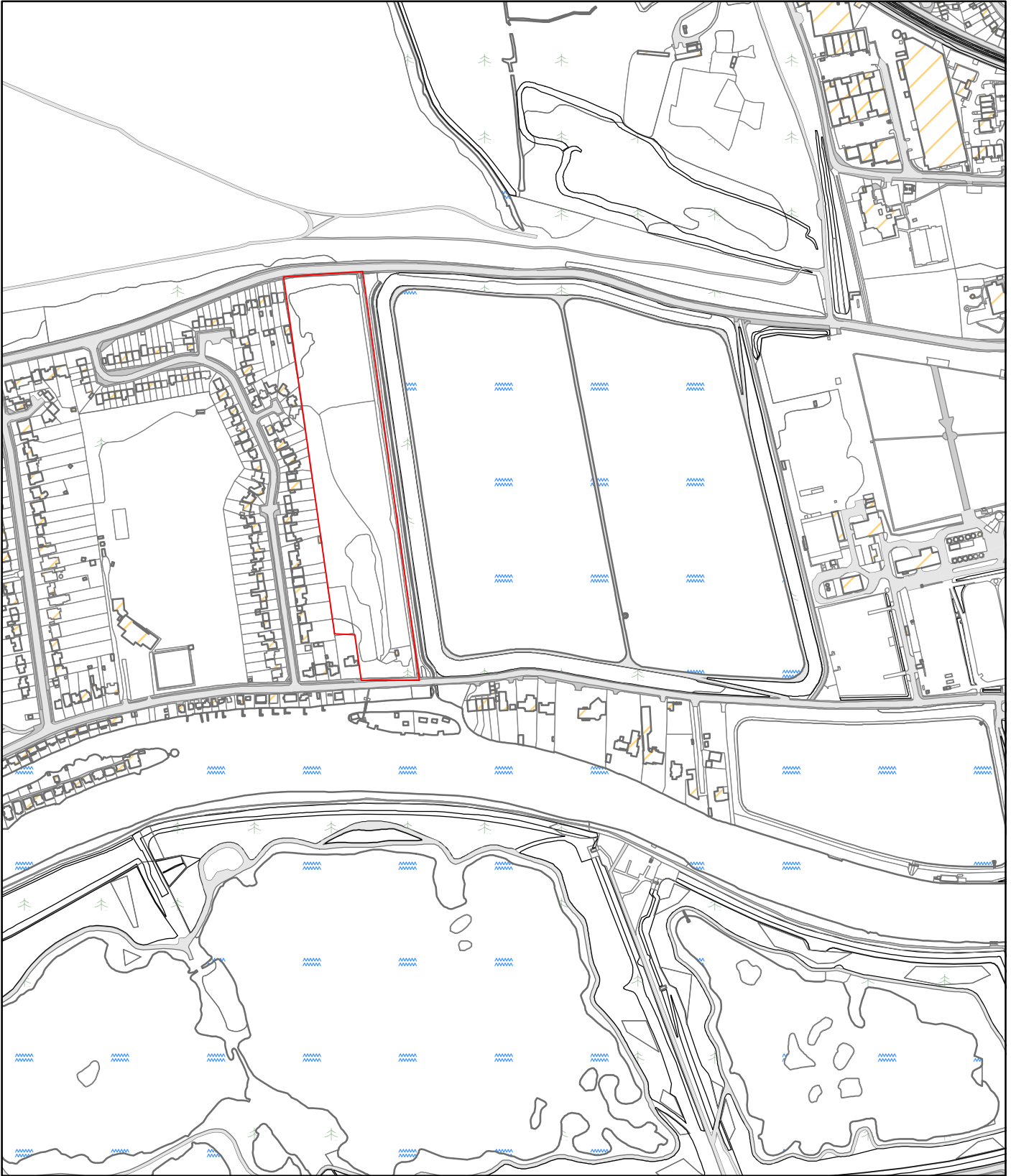
The position of any boundary or apparatus shown on this plan is given without obligation and warranty, and the accuracy cannot be guaranteed.

Service pipes are not shown but their presence should be anticipated. No liability of any kind whatsoever is accepted by Thames Water for any error or omission. The actual position of mains and services must be verified on site before any works are undertaken.

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Land to West of Stain Hill Reservoirs, Hampton WTW



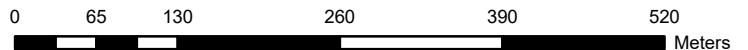
Thames Water
Map



Printed By : mhazeldi
Print Date : 28/02/2020
Map Centre On : 512389, 169688
Centre Tile No. : TQ1269NW

Comments:

At scale at A4



Current Scale : 1:6,060

Disclaimer: Based on the Ordnance Survey Map with the Sanction of the Controller of H.M Stationery Office License Number- 100019345

The position of any boundary or apparatus shown on this plan is given without obligation and warranty, and the accuracy cannot be guaranteed.

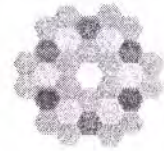
Service pipes are not shown but their presence should be anticipated. No liability of any kind whatsoever is accepted by Thames Water for any error or omission. The actual position of mains and services must be verified on site before any works are undertaken.

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Land Registry
Official copy of
title plan





Title number TGL394983
Ordnance Survey map reference TQ1269SE
Scale 1:1250
Administrative area Richmond upon Thames



© Crown copyright and database rights 2014 Ordnance Survey 100026316. You are not permitted to copy, sub-license, distribute or sell any of this data to third parties in any form.

*Stain Hill
Reservoirs*



-  My land
-  Post 1993 ADMIN. boundary
-  G.B boundary
-  G.B extension 1996

This official copy is incomplete without the preceding notes page.

Respondent 79 - Max Hampton



271 Hanworth Road - Site Location Plan



© Crown copyright 2000. All rights reserved. Based on Ordnance Survey digital data Survey Scale - 1:1250 Plotted Scale - 1:500
(Scales other than at Survey Scale should not be used for accurate measurement). Business occupancy data ©2000 Thomson Directories Ltd.



□ Development site ⋯ Freehold ownership

271/273 HANWORTH ROAD

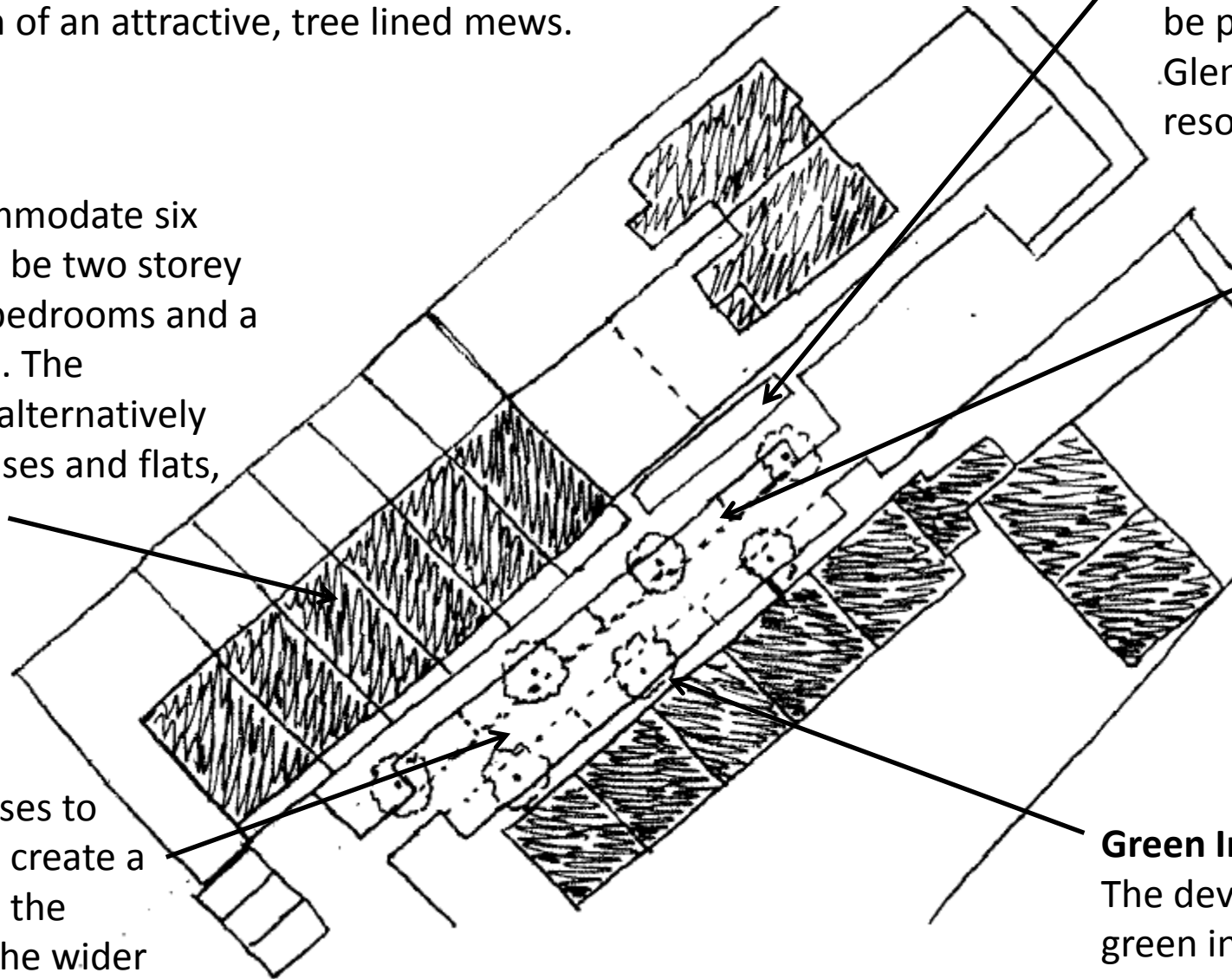
Development of a two/three storey terrace of houses or flats and creation of an attractive, tree lined mews.

Housing

The site could accommodate six houses. These could be two storey houses, with three bedrooms and a floor area of 95 sqm. The development could alternatively include a mix of houses and flats, as well some three storey elements.

Layout

Orientating the houses to face Glenmill would create a mews and integrate the development with the wider area.



Communal Facilities

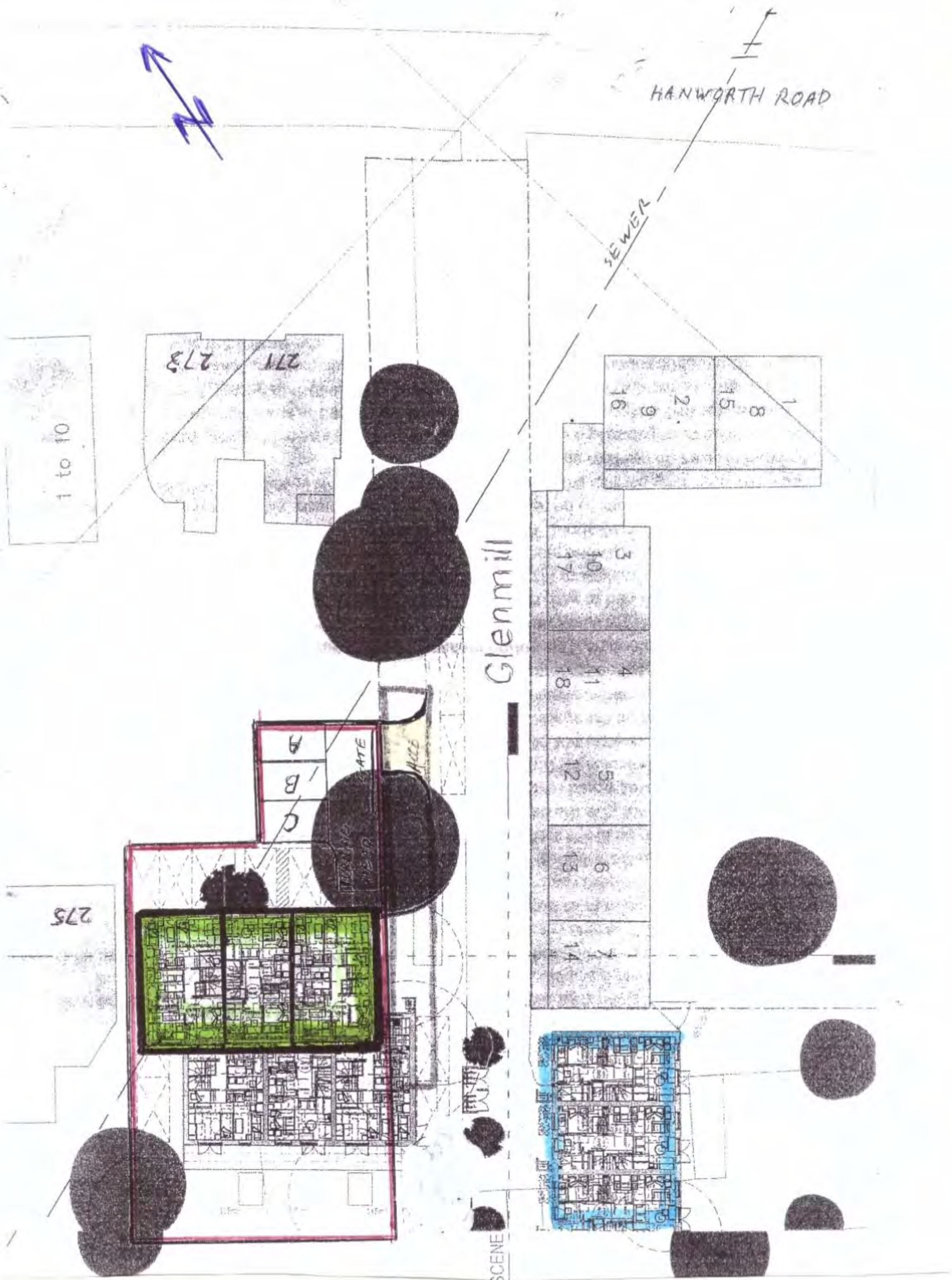
Bin storage and cycle parking could be provided within the wider Glenmill site, as a communal resource.

Car Parking

Cars could be sympathetically incorporated within the development, by widening the carriageway to create six additional on-street car parking spaces.

Green Infrastructure

The development could incorporate green infrastructure, such as street trees and SUDS, to enhance biodiversity and soften the street.



Potential residential development site: 271/273 Hanworth Road

47m x 20m. Possible 3-house overlay

All responses to the Draft Sustainability Appraisal Scoping Report
https://www.richmond.gov.uk/new_local_plan_direction_of_travel_engagement



Consultation from 24 February until 5 April 2020

Published by LBRuT November 2020

Please note, the responses below are exactly as received from the respondents and have not been edited by the Council. They are not alphabetically ordered or in any other order of priority.

Respondent reference no.	Name / Organisation
3.	Katie Parsons, Historic England
13.	Heather Archer, Highways England
17.	Hannah Bridges, Spelthorne Borough Council
19.	DP9 on behalf of London Square Developments

Table 1: All respondents to the engagement

Detailed comments as received:

Respondent ref. no.	Name / Organisation	Detailed comment
3.	Katie Parsons, Historic England	<p>As you will be aware under the provisions of Article 5(1) of the SEA Directive there is a requirement to assess the likely significant effects which the Policies and proposals of a Plan might upon “cultural heritage including architectural and archaeological heritage”. In terms of the historic environment, whilst we would many aspects of the Appraisal, we have the following comments to make:</p> <ul style="list-style-type: none"> • Plans, Policies, and Programmers: there are a number of other relevant plans and programmes that should be included in section 2.2: • UNESCO World Heritage Convention • European Landscape Convention • The European Convention on the Protection of Archaeological Heritage • Convention for the Protection of the Architectural Heritage of Europe • Planning (Listed Buildings & Conservation Areas) Act 1990 • Ancient Monuments & Archaeological Areas Act 1979 • The Royal Botanic Gardens Kew World Heritage Site Management Plan • The local level is also important in setting the appropriate context for the scoping report, which could helpfully draw on Richmond’s existing characterisations studies, local lists, Building of Townscape Merit SPD, Conservation Area Appraisals etc. Aspects of the emerging plan have the potential to impact upon the wider historic environment across administrative boundaries. It may be necessary to use local documents from neighbouring boroughs as part of the SA’s baseline evidence where relevant. <p>Section 3.24 – Historic Environment: This section is locally specific, detailed and comprehensive. We are pleased to see that cross boundary issues are being taken into consideration.</p> <p>Sustainability issues page 88 – we welcome that the conservation of the historic environment is recognised as sustainability issue. Column 3 should be expanded upon to make reference to the Kew World Heritage Site and to the borough’s Registered Parks and Gardens. Issues related to traffic congestion, air quality, noise pollution and other problems can affect the historic environment and detract from the setting of heritage assets and so it would be useful if this was also identified as an issue.</p> <p>SA objectives page 101 – this section should make reference to the Kew World Heritage Site and should reference the objectives set out in the WHS Management Plan.</p>

Respondent ref. no.	Name / Organisation	Detailed comment
		Method for Generation of Alternatives – The historic environment should be a factor when considering a method for the generation of alternative proposals. The impact of proposals on the significance of heritage assets should be taken into consideration at an early state. In terms of sites, this should be based on more than just measuring the proximity of a potential allocation to heritage assets. Impacts on significance are not just based on distance or visual impacts, and assessment requires a careful judgement based on site visits and the available evidence base.
13.	Heather Archer, Highways England	Of growing concern to Highways England is air quality and the impact of development traffic contributing to emissions from traffic on the SRN. We shall be paying particular attention to air quality matters and stress the need for appropriate monitoring. It is noted that the document does make reference to the SRN and highlights that there are high levels of traffic in the borough in the morning and evening peaks. However, no reference has been made to how the borough plans to reduce the impact of this (i.e. it should make reference to the car-free or car-lite proposals stated in the Local Plan Direction of Travel Consultation document). We recommend that this document should therefore ensure it identifies ways to reduce peak hour flows on the SRN.
17.	Hannah Bridges, Spelthorne Borough Council	The SA should be a key factor in the determination of the strategy pursued through the new Local Plan. This should be an iterative process and should seek to minimise the adverse impacts arising through the Plan.
19.	DP9 on behalf of London Square Developments (regarding the Greggs Bakery site)	Sustainability Appraisal – p. 6 The approach to considering environmental, social and economic sustainability in plan-making is supported. Environmental impact arising from pollution is particularly relevant to the subject Site. Its current industrial use has the potential to generate high levels of commercial vehicle traffic and therefore significant air quality impacts to surrounding residential uses. As part of the approach to promoting environmental sustainability, consideration must be given to protecting established residential communities from poor air quality.

Environment and Community Services
Andrea Kitzberger-Smith
Spatial Planning and Design Team Manager
Phone: 020 8891 1411
Email: LocalPlan@richmond.gov.uk

10 December 2021

[Enter 1st line of name and address here]
[Enter 2nd line of name and address here]
[Enter 3rd line of name and address here]
[Enter 4th line of name and address here]
[Enter 5th line of name and address here]

Dear Sir/Madam,

**London Borough of Richmond upon Thames – Local Plan Pre-Publication
(Regulation 18) Consultation 10 December 2021 to 31 January 2022**

Following our consultation in spring 2020 on the Direction of Travel, we have now prepared the first draft of the Local Plan, known as the ‘Pre-Publication Local Plan’.

We are consulting on the first draft of the Local Plan, which 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.

The draft Plan has been informed by a number of evidence base studies including an Open Land Review (Green Belt, Metropolitan Open Land, Local Green Space and Other Open Land of Townscape Importance), a review of nature conservation sites, an Urban Design Study, assessments of future needs for housing, retail and leisure, and employment land and premises.

The draft Local Plan, the accompanying Sustainability Appraisal, and other documents and evidence that support the draft Local Plan, are all available on our website.

The consultation is open to everyone. We would like to hear your thoughts and views on the draft Local Plan, and we are particularly keen to hear from our local communities, businesses as well as landowners and other key organisations in the borough. We have produced a response form, containing a number of questions, which we hope will help you in responding.

We will also hold a number of themed virtual events in January 2022, which will explain more about the draft Local Plan and provide an opportunity to discuss topics – more details, including how to register, will be on our website by the end of the year.

Where to view the documents and how to respond by 31 January 2022

The documents can be viewed as follows:

- Read the consultation documents at:

https://www.richmond.gov.uk/draft_local_plan_pre_publication_version and through our Consultation Portal at: <https://richmond-consult.objective.co.uk/kse>

- View the consultation material at the Civic Centre, 44 York Street, Twickenham, TW1 3BZ and in the Borough's main libraries.

Please contact us should you have problems accessing or printing the documents.

You can respond by:

- Completing the **online response form** through our Consultation Portal <https://richmond-consult.objective.co.uk/kse>
- Completing the word or pdf version of the **response form** available from https://www.richmond.gov.uk/draft_local_plan_pre_publication_version and sending it by
 - **email** to **LocalPlan@richmond.gov.uk** or
 - **post** to Spatial Planning and Design, LB Richmond upon Thames, Civic Centre, 44 York Street, Twickenham, TW1 3BZ

We would prefer all comments to be made electronically. Please note that the **deadline for comments is Monday 31 January 2022**, and responses will not be treated as confidential.

What happens next

Following this consultation, we will consider and analyse all responses received and make changes to the Plan, where appropriate. There will be a further round of public consultation on our final version of the Local Plan (so called 'Publication' or 'Regulation 19' version) later in 2022. This will be the version that we will submit – together with the representations received – to the Secretary of State for independent examination in public. The Local Plan is anticipated to be adopted in Autumn 2024.

You have received this notification as you have previously engaged with the Richmond Planning Policy and Design team or we have identified you as a stakeholder. 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. We hope that you or your organisation will continue to take an interest in, and contribute to, future planning policy and design policy. If you'd like to continue hearing from us, then you do not need to do anything to respond to this. If, however, you would prefer not to receive notifications regarding planning policy and design matters from us, then please notify us, preferably by email to LocalPlan@richmond.gov.uk

Yours faithfully

Andrea Kitzberger-Smith
Spatial Planning and Design Team Manager



[Planning](#) / [Planning policy](#) / [The Local Plan](#) / [Draft Local Plan](#)

Draft Local Plan: Pre-Publication version

About the consultation

This is an important stage in the process in developing a new Local Plan, known as the 'Pre-Publication' or 'Regulation 18' stage. We are consulting to 31 January 2022.

This first draft of the Plan sets out a strategic vision, objectives and spatial strategy, with place-based strategies and thematic policies and guidance to manage growth and guide development across the borough over a 15-year period.

Its development has been informed by a [Direction of Travel](#) public consultation which was undertaken in spring 2020.




We would like to hear your thoughts and views on the draft Local Plan, and we are particularly keen to hear from our local communities, businesses as well as landowners and other key organisations in the borough.

Participate in Local Plan virtual events

We are holding a number of virtual events in January 2022 to provide an opportunity to discuss the Local Plan. Find out [more about the sessions and how to take part](#).

Consultation documents


The key consultation documents are:

- 'Pre-Publication' Draft Local Plan (Regulation 18) (December 2021)
 - [PDF version - low resolution](#)  (pdf, 19.3 MB)
 - [PDF version - high resolution](#)  (pdf, 31.3 MB)
 - [Online version](#)
- [Sustainability Appraisal of the Pre-Publication Local Plan \(December 2021\)](#)  (pdf, 3.8 MB) (includes a non-technical summary)

These key consultation documents can also be viewed at the Civic Centre, 44 York Street, Twickenham, TW1 3BZ and in the borough's main libraries (from 17 December 2021).

Supporting documents

The 'Pre-Publication' Draft Local Plan is also informed by other supporting documents:

- [Equality Impact and Needs Analysis \(December 2021\)](#)  (pdf, 381 KB)
- [Habitats Regulation Assessment \(December 2021\)](#)  (pdf, 5.6 MB)

- [Health Impact Assessment \(December 2021\)](#) (pdf, 379 KB)
- [Flood Risk and Development Sequential Test \(December 2021\)](#) (pdf, 75mb)
- [Direction of Travel Consultation Responses Summary Report \(November 2020\)](#) (pdf, 1.5 MB)

The following documents have also been produced and may assist anyone responding to this consultation:

- [A summary of the place-based strategies with site allocations and policies \(December 2021\)](#) (pdf, 530 KB) - sets out some of the main changes when compared to the adopted Local Plan
- [Schedule of sites not taken forward as Site Allocations in the new Draft Richmond Local Plan \(December 2021\)](#) (pdf, 169 KB)

Evidence base

There are a number of research and studies forming the Local Plan [evidence base](#). The following have recently been updated. Further phases and additional studies are due to be undertaken in early 2022, to inform the final version of the Plan.

- [Open Land Review \(Green Belt, MOL, LGS and OOLTI\)](#) (2021)
- [Review of Sites of Importance for Nature Conservation](#) (2021)
- [Urban Design Study](#) (2021)
- [Employment Land and Premises Needs Assessment \(December 2021\)](#)
- [Local Housing Needs Assessment \(stage 1\)](#) (July 2021)
- [Retail and Leisure Needs Study \(phase 1\)](#) (July 2021)
- [Strategic Flood Risk Assessment and groundwater investigation](#)

How to take part

Online

Submit an online response through our [consultation portal](#).

Email

Email a response form to localplan@richmond.gov.uk:

- [Response form](#) (pdf, 202 KB)
- [Response form](#) (MS Word, 305 KB)

Post

Post a hard copy of the response form to Spatial Planning and Design, LB Richmond upon Thames, Civic Centre, 44 York Street, Twickenham, TW1 3BZ.

All responses must be received by **Monday 31 January 2022**. Please note responses will not be treated as confidential.

What happens next

Following this consultation, we will consider and analyse all responses received and make changes to the Plan, where appropriate. There will be a further round of public consultation on our final version of the Local Plan (so called 'Publication' or 'Regulation 19' version) later in 2022. This will be the version that we will submit - together with the representations received - to the Secretary of State for independent examination in public.

The Local Plan is anticipated to be adopted in Autumn 2024.

Contact

If you would like to be kept informed of future progress on the Local Plan, you can opt-in to our Local Plan database by emailing your contact details to localplan@richmond.gov.uk.

If you would like more information, please contact the Local Plan team at the same email address.

Up to: **[Draft Local Plan](#)**

Updated: 17 December 2021

[Contact us](#)

Address: Civic Centre, 44 York Street, Twickenham, TW1 3BZ
Opening hours: Monday to Friday: 9am to 5pm

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Draft Local Plan Pre-Publication Consultation

From 10 December 2021 to 31 January 2022

RESPONSE FORM

The Council is inviting comments on the first draft of the Local Plan.

The draft Local Plan sets out a 15-year strategic vision, objectives, place-based strategies and the overall spatial strategy for the borough as well as the planning policies that will guide future development in the borough. It looks ahead to 2039 and identifies where the main developments will take place, and how places within the borough will change, or be protected from change, over that period. In addition, the draft Local Plan sets out the site allocations that are considered to assist with the delivery of the vision and strategy of the Plan. This is of particular importance for ensuring there is sufficient land for employment, retail, housing and social infrastructure.

We would like to hear the views from our local communities, businesses and other key organisations on the draft Plan.

How to respond

Please read the consultation documents and other background information made available on the Local Plan website. To view the draft Local Plan and take part in the consultation, visit https://www.richmond.gov.uk/draft_local_plan_pre_publication_version

You can respond on the consultation documents in the following ways:

- Online response form through our **consultation portal** <https://richmond-consult.objective.co.uk/kse>
- Email to **LocalPlan@richmond.gov.uk** this response form (a PDF and Word version of the form can be found on the Council's website at https://www.richmond.gov.uk/draft_local_plan_pre_publication_version). In the form in 'Word' format you can type in your response and return it as an email attachment
- Post a hard copy of the form to Spatial Planning and Design, LB Richmond upon Thames, Civic Centre, 44 York Street, Twickenham, TW1 3BZ.

All responses must be received by Monday **31 January 2022**.

This form has three parts:

- Part A – Personal details and about you
- Part B – Your general views
- Part B – Your detailed response

Part A: Personal Details		
	1. Personal Details *	2. Agent's Details (if applicable)
Title		
First name		
Last name		
Job title (where relevant)		
Organisation (where relevant)		
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.

Part A: About You...		
3. Please tell us about yourself or who you are responding on behalf of...(tick all which apply)		
Do you live in the borough?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Do you work in the borough?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Do you run a business in the borough?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Are you a student in the borough?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Are you a visitor to the borough?	Yes <input type="checkbox"/>	No <input type="checkbox"/>

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.

Part B: Your General Views

4. Do you agree or disagree with the Strategic Vision? (section 3)

Strongly Agree Agree Neither Agree/Disagree Disagree Strongly Disagree

Any comments:

5. Do you agree or disagree with the Strategic Objectives? (section 3)

Strongly Agree Agree Neither Agree/Disagree Disagree Strongly Disagree

Any comments:

6. Do you agree or disagree with Policy 1. Living Locally and the 20-minute neighbourhood? (section 4)

Strongly Agree Agree Neither Agree/Disagree Disagree Strongly Disagree

Any comments:

7. Do you agree or disagree with Policy 2. Spatial Strategy: Managing change in the borough? (section 4)

Strongly Agree <input type="checkbox"/>	Agree <input type="checkbox"/>	Neither Agree/Disagree <input type="checkbox"/>	Disagree <input type="checkbox"/>	Strongly Disagree <input type="checkbox"/>
---	--------------------------------	---	-----------------------------------	--

Any comments:

8. Do you agree or disagree with the place-based strategies? (sections 6 to 14)

Strongly Agree <input type="checkbox"/>	Agree <input type="checkbox"/>	Neither Agree/Disagree <input type="checkbox"/>	Disagree <input type="checkbox"/>	Strongly Disagree <input type="checkbox"/>
---	--------------------------------	---	-----------------------------------	--

Any comments:

Part C: Your Detailed Response

9. To which parts 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	
Draft Local Plan	<input type="checkbox"/>	Page number(s)	
		Paragraph number(s)	
		Policy no./name	
		Place-based strategy	
		Site Allocation(s) no./ name	
		Maps	
		Tables	
Sustainability Appraisal Report	<input type="checkbox"/>	Page number(s)	
		Paragraph number(s)	
Other (for example an omission or alternative approach, or in relation to another supporting document/evidence base)	<input type="checkbox"/>		

10. Please give details below to set out your representation.

Please make it very clear to which document your comments relate to by indicating policy/place-based strategy/site reference, name and number, and/or paragraph number.

Please continue on a separate sheet / expand box if necessary.

11. Please set out what change(s) you consider necessary, why these changes should be made and what your supporting evidence is.

--

Please continue on a separate sheet / expand box if necessary.

Please note your detailed response should cover succinctly all the information, evidence and supporting information necessary to support / justify the response and the suggested change.

Following the consultation on the draft Local Plan, we will consider and take account of all responses received. There will be a further opportunity to view and comment on the final draft version of the Local Plan later in 2022, before it will be submitted in 2023 to the Secretary of State for examination in public by an independent planning inspector.

12. 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, complete Part A: Personal Details of this form and return it to us as appropriate.

Signature:

For electronic responses a typed signature is acceptable.

Date:

► Planning Notices

LONDON BOROUGH OF RICHMOND UPON THAMES RICHMOND LOCAL PLAN

The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) Public Notice to invite comments on the Draft Local Plan Pre-Publication Consultation* Public consultation: 10 December 2021 to 31 January 2022

Following our consultation in spring 2020 on the Direction of Travel, we have now prepared the first draft of the Local Plan, known as the 'Pre-Publication Local Plan'.

We are consulting on the first draft of the Local Plan, which 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.

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The consultation is open to everyone. We would like to hear your thoughts and views on the draft Local Plan, and we are particularly keen to hear from our local communities, businesses as well

as landowners and other key organisations in the borough. We have produced a response form, containing a number of questions, which we hope will help you in responding.

Where to view the documents and how to respond by 31 January 2022

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Please contact us should you have problems accessing or printing the documents.

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- Completing the word or pdf version of the **response form** available from https://www.richmond.gov.uk/draft_local_plan_pre_publication_version and sending it by
 - **email** to LocalPlan@richmond.gov.uk or
 - **post** to Spatial Planning and Design, LB Richmond upon Thames, Civic Centre, 44 York Street, Twickenham, TW1 3BZ

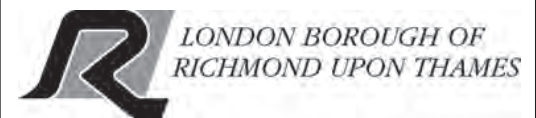
We would prefer all comments to be made electronically. Please note that the **deadline for comments is Monday 31 January 2022**, and responses will not be treated as confidential.

What happens next

Following this consultation, we will consider and analyse all responses received and make changes to the Plan, where appropriate. There will be a further round of public consultation on our final version of the Local Plan (so called 'Publication' or 'Regulation 19' version) later in 2022. This will be the version that we will submit – together with the representations received – to the Secretary of State for independent examination in public. The Local Plan is anticipated to be adopted in Autumn 2024.

Andrea Kitzberger-Smith
Spatial Planning and Design Team Manager

* The document applies to the whole borough and has been prepared in accordance with the Planning and Compulsory Purchase Act 2004 (as amended) and Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended). Note the Area Action Plan (AAP) for Twickenham, which was adopted in 2013, will be superseded by this new Local Plan. However, the Ham and Petersham Neighbourhood Plan (2019) and the West London Waste Plan (2015) will remain as existing.



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*Source: Newsquest data 2021

[December 2021](#)

Have your say on the new Local Plan to help shape the borough's development

16 December 2021

Richmond Council has published the first draft of the new Local Plan, which sets out a 15-year strategic vision to guide development and place-making across the borough.

When finalised, the Local Plan will be the main document against which planning applications are assessed, and residents, businesses and other key organisations are invited to [share their feedback](#).

At the heart of the draft Local Plan is the concept of a 20-minute neighbourhood – the idea that our places should be complete, compact, and connected neighbourhoods where most of the things we need for shopping or visiting are an easy walk or cycle away. This concept enables our communities and residents to 'live locally', which will not only improve the quality of life, but will also bring many other benefits such as healthier lifestyles, cleaner air, stronger local economies and a better resilience against climate change.

The Local Plan is supported by a large amount of research and numerous studies, which form the basis for a holistic understanding of the borough's qualities, constraints and capacity for growth, and assessing future needs.

The draft Local Plan is based around ten key themes:

- Responding to the climate emergency and taking action
- Delivering new homes and an affordable borough for all
- Shaping and supporting our town and local centres as they adapt to changes in the way we shop and respond to the pandemic
- Increasing jobs and helping business to grow and recover from the impacts of the pandemic
- Protecting what is special and improving our areas (heritage and culture)
- Increasing biodiversity and the quality of our green spaces and waterway
- Improving design, delivering beautiful buildings and high-quality places
- Reducing the need to travel and improving the choices for more sustainable travel
- Securing new social and community infrastructure to support a growing population
- Creating safe, healthy, and inclusive communities

The draft Local Plan takes a stronger approach to addressing the Climate Emergency, including setting requirements for new development on small sites to contribute to urban greening and biodiversity. It also takes a stronger approach to implementing requirements for affordable housing alongside all new homes.

Each place in the borough has a vision and plans for how it might be expected to change; the Council wants to hear from residents who know those places best as to whether this reflects what they would want to see for the future. There are also eight new key site allocations flagged for potential development including Teddington Police Station and former House of Fraser in Richmond Town Centre.

The consultation is open to everyone until 31 January 2022. Once it closes, Richmond Council will make changes to the Local Plan, taking account of the feedback where appropriate. There will be a further consultation, and, following examination by an independent Inspector, it is expected that the new Local Plan will be adopted in 2024. Visit the website for more information and to [share your comments](#).

Cllr Julia Neden-Watts, Chair of the Environment and Sustainability Committee, said:

“The COVID-19 pandemic has shown us just how important the concept of ‘local’ is. The new draft Local Plan aims to build on this by enhancing local places, whilst still protecting their unique character. It outlines how the borough will change and so it is important that you share your feedback and ensure your voice is heard. We want to set out ambitious policy requirements for new development to ensure it plays a role in responding to future challenges including climate change, affordability, health and wellbeing. Please visit the consultation page and share your comments - your responses will be used to shape the next version of the Plan.”

Residents are invited to attend collaborative and informative workshops to help share their feedback on the Draft Local Plan. The events will take place on Zoom on 18 January, 19 January and 25 January. More information will be shared soon.



[Share this](#)

Up to: **December 2021**

Updated: 16 December 2021

Contact us

Address: Civic Centre, 44 York Street, Twickenham, TW1 3BZ
Opening hours: Monday to Friday: 9am to 5pm

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‘Pre-Publication’ Draft Local Plan (Regulation 18) Consultation Responses

Planning

June 2023

About the consultation

The [consultation](#) was undertaken 10 December 2021 to 31 January 2022. Comments could be made through a [response form](#) (online, by email or post).

A number of virtual events were held in January 2022. There is a separate [engagement event report](#) about those events including the comments made, and where relevant the issues raised have been integrated into the summaries below from section 3 onwards.

The appendix to this report is a schedule of all the responses in full, along with the Council's officer response to each comment.

1. All respondents to the public consultation

Name / Organisation
David Abel
Matt Allchurch
Angela Appleby
Ursula Armstrong
Ben Ayliffe
Lynne Bailey
N'Yasha Bailey
Sarah Ball
Paul Barker
Liz Baran
Andrew Barnard
Kathleen Barnes
Emma Robinson, Barnes Community Association
James Bartholomeusz
John Blackwell
Robert Blakebrough
Lauren Bloch
Faye Wright, Forward Planning and Development on behalf of BMO Real Estate
Matthew Bolton

Jim Brockbank
Alan Brocklehurst
John Buckingham
Jon Burrell
MA & JA Byrne
Alison Campbell
Danielle Cantillon
Jean Carlin
Nicholas Carpenter
Matthew Casson
Kerry Chauhan
Vin Chauhan
Joanna Childs
Ziyad Thomas, Planning Issues Ltd on behalf of Churchill Retirement Living and McCarthy Stone
Sue Clayton Smith
Jane Cliff
Colin Clode
David Cloke
Judie Cole
Louise Cole

Michael Cole
John Coleman
Andy Collier
Patrick J Collins
Ann Cornick
Tracey Costard
Marcia Cotton
Rod Cowan
Alice Roberts, CPRE London
Christine Craik
Douglas Craik
John Waxman, Crane Valley Partnership
Stephen Croft
Michael Cross
Edward Cummings
Kevin Curtin
Paul Luton, Cycling UK
Ian Anderson, Lichfields on behalf of David Lloyd Leisure Ltd (David Lloyd)
Nicole Davies
Margaret Judith Davison
Marrin Dawson
David Deaton
John and June Demont
Samantha Powell, Department for Education
Emma Dobson
Carolyn Doughty
Matthew Doughty
Mr & Mrs S Drudge
Christine Duke
Emma Penson, DWD on behalf of Dukes Education Group and Radnor House School Limited

Tom Dunbar
Emma Durnford
Corinna Durocher
Peter Eaton
Michelle Eden
Barbara Egan
Mary Egan
Eva Eldridge
Suzanne Parkes, Elmbridge Borough Council
Daniel England
George Goodby, Environment Agency
Kerem Eryavuz
Eileen Folan
Sue Ford
Laura and Nick Forrest
Lesley Forster
Gary Backler, Friends of the River Crane Environment (FORCE)
Barbara Fryatt
Arthur Gelling
Joan Gibson
Hilary and Chris Gooch
Jennie Gower-Smith
Sadie Green
Charles Griffiths
Mamun Madaser, Habinteg Housing Association
Vicky Phillips, Habitats & Heritage
Katarina Hagstrom
Andy Hale
Melissa Hallan
Paul Hargraves
Trish Harle

Vincent Gabbe, Knight Frank, on behalf of Harlequin Football Club Limited
Siriol Davies, Ham and Petersham Neighbourhood Forum
Lynda Hance
Tim Harrington
Rosemary Harrison
Unity Harvey
David Hayne
Peter Heighes
Judith Heyworth
Janice Burgess, Highways England
Mark Connell, Sphere25 on behalf of Hill Residential
Terence Hirst
Katie Parsons, Historic England
Fiona Holland
James Stevens, Home Builders Federation (HBF)
Steve Honeybourne
Richard Hooker
Yvonne Hooker
Elizabeth Honer
Kenneth Howe
Mrs D Hudson
Zoe Ide
Irene Iwunze
Felicity Jackson
Myrna Jelman
John Jenkins
Caryn Jenner
Benjamin John
N Maureen John
Gemma Johnson

Denise July
Henry Carling, Kandahar (Jackson Square) Ltd
Elizabeth, Seymour and Joshua Kelly
Anna Kendall
Alice Shackleton, on behalf of The Kew Society
Sue Kidger
Jessica King
Karen L Kirkham
Christopher Knights-Whittome
Anthony Langridge
Mark Lawson
Robin Legard
Andrea Legrand
Marie Lewis
James Sheppard, CBRE, on behalf of LGC Ltd
Victoria Little
Patty Lloyd
Charlotte Orrell, DP9 Ltd on behalf of London Square Developments
Christopher Loughton
Margaret Loughton
Serge Lourie
Lucinda Robinson, Marine Management Organisation (MMO)
David Marlow
Michael Massey
Johann Martin
Nina Miles, GLA on behalf of Mayor of London
John McCarthy
EE McClelland
Stella Mccusker
Fiona McDaniel, McDaniel Woolf

Ben Fox, Planware LTD on behalf of McDonald's Restaurants LTD
Winifred McGee
Anna McGeoghegan
Mr & Mrs Metcalf
Vincent Gabbe, Knight Frank, on behalf of the Metropolitan Police Service
Wendy Micklewright
Matt Scales, Metropolitan Police Service - Designing Out Crime
Max Millington
John Miln
Rob Mitchener
Aleksandra Momic
Carol Morey
Tim Catchpole, Mortlake with East Sheen Society
William Mortimer
Conor Mulhern
Adrian Mullen
Tara Munday
Hannah Gray, Avison Young on behalf of National Grid
Katy Wiseman, National Trust
Natural England
Mark Newman
Sharon Newman
Emma Nicholls
Susan Norgan
Andrew Norman
Lynda Norman
Wendy J Norman
Clair O'Brien-White

Peter Willan and Paul Velluet, Old Deer Park Working Group
Hannah Oneill
Nuala Orton
Christine Palmer
Susan Park
Alison Parkes
Nicholas Grundy (responding as partners at Park Road Surgery)
Emma Nicholls, Park Road Surgery on behalf of patients
K Peachey
Michael and Jackie Perry
George Voss, WSP on behalf of Petersham Nurseries Ltd
Sarah Phillips
Kevin Scott, Solve Planning Limited on behalf of Port Hampton Estates Limited
Michael Atkins, Port of London Authority (PLA)
Jonathan Price
@PP
Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)
Geoff Adams, Putney Town Rowing Club
Magda Rabenda
Lesley Redding
Simon Redding
Leah Regel
Neil Henderson, Gerald Eve on behalf of Reselton Properties
Gary Rhodes-Brown

Simon Tompsett, Richmond & Twickenham Friends of the Earth
Philip Briggs, Richmond Bat Species Action Plan Steering Group
Juliet Ames-Lewis, The Richmond Charities
Heather Mathew, Richmond Council for Voluntary Service (CVS)
James Armstrong, Richmond Cycling Campaign
Rob Cummins, RHP
Alec Lever, Richmond Labour Party
Louise Fluker, The Richmond Society
Mark Buxton, RPS on behalf of Richmond upon Thames College
Audrey Rigge
Steve Rigge
Hilary Pereira, River Thames Society
Alan Roderick
Amanda Root
Catherine Rostron
Melanie Gurney, The Planning Lab, on behalf of the Royal Botanic Gardens
Ugne Staskauskaitė, Cushman & Wakefield on behalf of Royal Mail Group
Theresa Oddelm, The Royal Parks
F A Rowbotham
Gerald Rowe
Jon Rowles
Hannah Blunstone, CBRE on behalf of Rugby Football Union (RFU)
Judith Rutherford
Anna Stott, WSP on behalf of Sainsbury's
Paul Sanders

Ann Sandford
Stephanie Saul
Sally Serkovich
Theodore Serkovich
Mr & Mrs Shanks
Philip Villars, WSP on behalf of Sharpe Refinery Service Limited
John Sheppard
Daniella Marrocco, ROK Planning on behalf of Shurgard UK Ltd
Robin Sinclair
Alan Smith
Alan Smith
Joyce Smith
Moya Meredith Smith
Stella Smith
Tove Smith
Jeremy Smithers
Bartle Smith Smudge
Clare Snowdon
Olivier Somenzi
Anna Russell-Smith, Montagu Evans on behalf of South West London and St George's Mental Health NHS Trust
Martin Ellis, South West London Clinical Commissioning Group (CCG)
Joanna Sowell
Hannah Bridges, Spelthorne Borough Council
Laura Hutson, Sport England
Jamie Stewart-Liddon
Nick Alston, Avison Young on behalf of St George Plc and Marks & Spencer
Gavin Hindley, St Mary's University

Ina Stradins
David Cornwell, Strawberry Hill Residents Association
Larissa Suchecka
Jane Sweetman
Mike Priaux, Swifts Local Network: Swifts & Planning Group
Jane Tarbuck
David Taylor
Graeme Fraser-Watson, The Teddington Society (Planning Group)
Sebastien Thelu
Catherine Thomas and Valentin Andreev
Alison Thomson
Celia Till
Charles Titcombe
Chris Toop
Richard Carr, Transport for London (TfL)
Luke Burroughs, Transport for London (TfL) Commercial Development
Shahina Inayathusein, TfL Location Enquiries
David Wilson, Thames Water
Philip Tucker
James Tullo
Neroli Tullo
Alexandra Bamford, Boyer Planning on behalf of Twickenham Film Studios

Mark Jopling, Udney Park Playing Fields Trust
Peter Vincent
Dilys Walker
Deborah Waddon
Ken Ward
Councillor Richard Warren
Liz Waters
Jonathan Wax
Leslie Welch
Moira Welch
Victoria Barrett-Mudhoo, Lichfields on behalf of the West London NHS Trust
Stephen Brooker, Walsingham Planning, on behalf of Whitbread Plc
Eve Whitby
Andrew Whitehead
Michael Whitham
Wendy Whitham
Martin Peace, Whitton Community Association
Michele Williams
Chris Whittome
Bridget Fox, on behalf of the Woodland Trust
Sandra Worth
Caroline Wren
Chrissie Wrench
Mark Yates

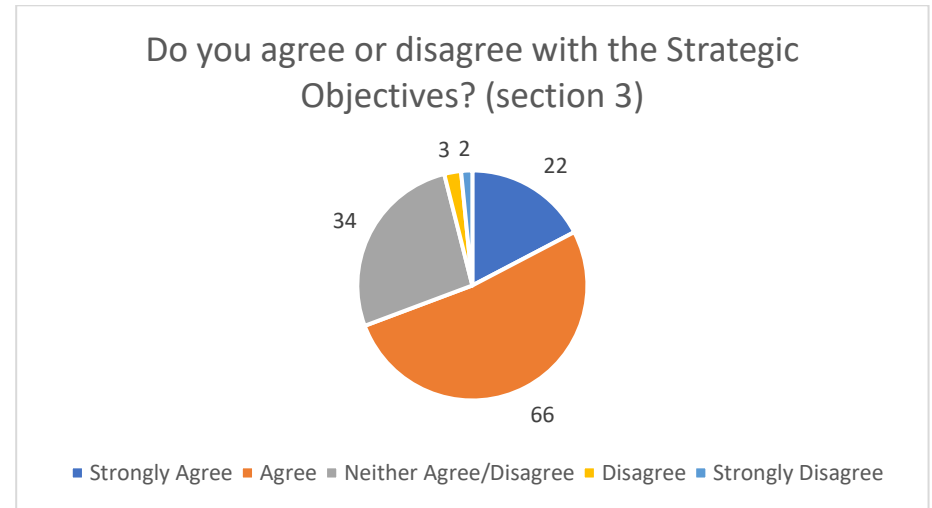
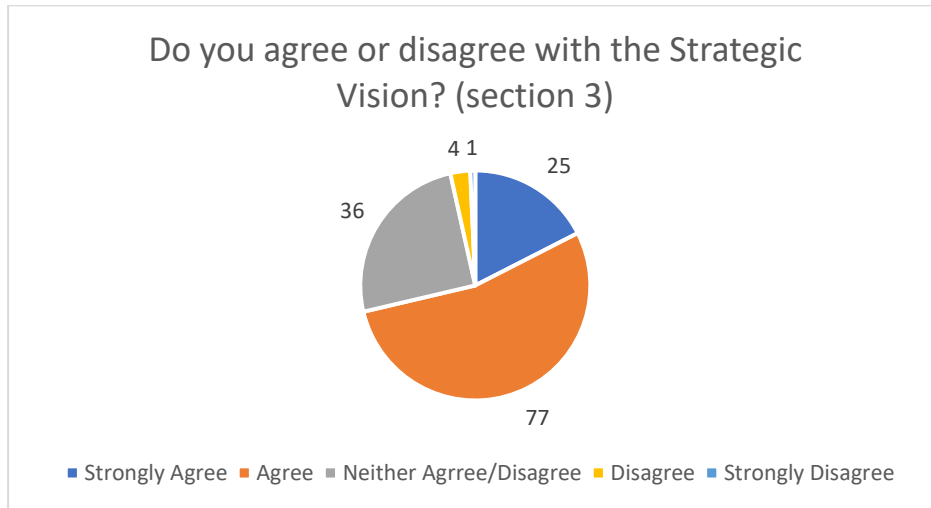
About the respondents

Comments were received from 311 respondents. Some responses were to the draft Local Plan, and/or the supporting documents including the Sustainability Appraisal, Habitats Regulation Assessment, and/or other evidence base reports.

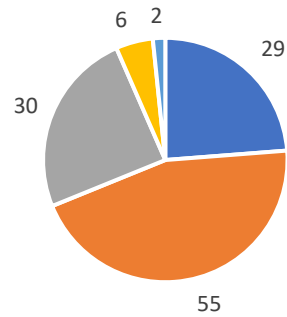
Respondents included a range of residents and amenity groups, landowners, organisations and statutory consultees. Part A of the [response form](#) asked 'about you' or who you are responding on behalf of. Of respondents who answered this question (with any duplicate responses removed), 168 said they live in the borough, 63 work in the borough, 36 run a business in the borough, 1 is a student in the borough, and 5 are a visitor to the borough (respondents could select as many as apply to them).

2. General Views

Part B of the [response form](#) asked about general views on the strategic vision, strategic objectives, Policy 1 'Living Locally and the 20-minute neighbourhood', Policy 2 'Spatial Strategy: Managing change in the borough?', and the place-based strategies. The following charts show the total number of respondents (with any duplicate responses removed).

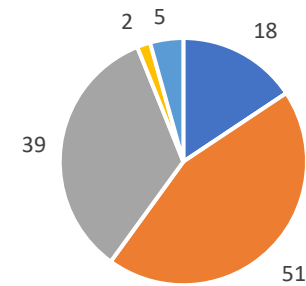


Do you agree or disagree with Policy 1. Living Locally and the 20-minute neighbourhood? (section 4)



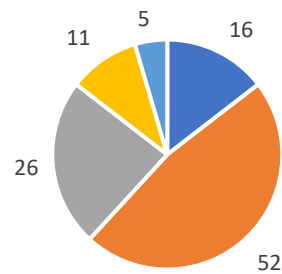
■ Strongly Agree ■ Agree ■ Neither Agree/Disagree ■ Disagree ■ Strongly Disagree

Do you agree or disagree with Policy 2. Spatial Strategy: Managing change in the borough? (section 4)



■ Strongly Agree ■ Agree ■ Neither Agree/Disagree ■ Disagree ■ Strongly Disagree

Do you agree or disagree with the place-based strategies? (sections 6 to 14)



■ Strongly Agree ■ Agree ■ Neither Agree/Disagree ■ Disagree ■ Strongly Disagree

3. Summary of all main issues raised during the Pre-Publication consultation

<i>Summary of all main issues raised</i>	<i>Summary of how issues raised have been dealt with</i>
<i>General/Introduction</i>	
<ul style="list-style-type: none"> • Some comments did not agree with the order of the Plan. • Some comments raised issues that had not been covered in the strategic context and trends, such as on health inequalities or Heathrow. • A few comments related to the supporting documents to the Plan – the Sustainability Appraisal, the Habitats Regulation Assessment, and the Sequential Test Report. • Some comments collated against the general/introductory parts of the Plan raised broad issues, such as on infrastructure. 	<ul style="list-style-type: none"> • Specific references have been added to the strategic context and trends section on health inequalities and carers. • The supporting Sustainability Appraisal, Habitats Regulation Assessment, and the Sequential Test report have all been updated to accompany the Regulation 19 Plan. • The update to the Infrastructure Delivery Plan also covers some of the general issues raised, where they are within the remit of the Local Plan.
<i>Vision and Strategic Objectives, Spatial Strategy, Place-Based Strategies and Site Allocations</i>	
<ul style="list-style-type: none"> • General support for the vision. Some support for the emphasis including on climate change and responding to change. Some suggestions for areas to improve and issues to address. A few over-development concerns. Some felt could be meaningless without measurable targets and could be bolder. The Mayor of London comment the themes and objectives align well with the London Plan ‘Good Growth’ policies. • Some general support for the strategic objectives, or support for some of them but not all. While some support for particular emphasis, should acknowledge competing objectives and some suggestions the climate emergency should take priority. Some suggestions for detailed issues to address across most of the themes. • There was broad support for the concept of ‘living locally’ (Policy 1), although some concerns about how it would be implemented, the need to address public transport and the need to provide for the transport needs of those less mobile (elderly, disabled etc). Comments highlighted the need for clarification, and to ensure a range of infrastructure and facilities. • There was broad agreement with the spatial strategy (Policy 2), although some concerns about the challenges and high-rise/high density development, with some suggestions for specific issues to be raised. • Many respondents agreed with the overall approach to the place-based strategies and Site Allocations. The Ham & Petersham Neighbourhood Forum support the vision that builds on the Neighbourhood Plan. Some respondents disagreed with the separation into ‘places’, and felt issues were inconsistent or not addressed. Some comments about 	<ul style="list-style-type: none"> • The vision now reflects the Council’s commitment to a borough wide net zero target of 2043. Some specific references have been added to emphasis improvements to public transport, and cover additional issues, including flood risk, and health inequalities. • The strategic objectives refer to further detailed issues including dark spaces for biodiversity, engaging with local community groups invested in blue and green assets, flood storage, climate resilience in development, safer use of spaces, and health and care services. • There is clarity to how the Living Locally (Policy 1) is intended to be implemented, addressing those with reduced mobility and explain the geography does not have any fixed zones or boundaries. • The context for the spatial strategy (Policy 2) is updated, to refer to new and updated evidence base. • Three new Site Allocations added - Hampton Telephone Exchange, Homebase at Hampton and Fulwell Bus Garage; two site allocations have been removed, i.e. Hampton Delivery Office and Twickenham Police Station. The boundary to the Site Allocation for Hampton Square is amended to remove the small portion of OOLTI/POS. A number of the Site Allocations have been updated, and all of the Site Allocations have been re-formatted in the Regulation 19 Plan to aid clarity.

the Urban Design Study and a couple of comments related to overdevelopment. There were individual comments on specific places/sites, and some new sites suggested on the basis of their similarity to existing Site Allocations.

- A comment the Site Allocation for **Hampton Square** is an implicit threat to build on the part of the site designated as OOLTI. Sainsbury's comment the Site Allocation for the **Carpark for Sainsburys, Uxbridge Road, Hampton** allocation for 100% affordable housing is not justified. A significant number of comments were received on the Site Allocation for **Teddington Police Station**, from Park Road Surgery and patients and individuals supporting its allocation, asking the Local Plan to require the Surgery to be relocated there; the Met Police also commented the Site Allocation was unreasonable and inflexible. Harlequins Rugby Football Club raised the Site Allocation for **The Stoop** should include land to the east and has potential to accommodate 7 stories or more. The RFU comment on the Site Allocation for **Twickenham Stadium** that the stadium's role as an entertainment venue should be recognised. The Met Police comment on the Site Allocation for **Twickenham Police Station** as it will be retained for policing and should be removed from the Plan. The Whitton Community Association comment the Site Allocation for Whitton Comm Centre should reflect a wider opportunity to create a masterplan and consider the needs-based community spaces. St George Plc and Marks & Spencer comment on the Site Allocation for **Kew Retail Park** seeking clarification on acceptable amount of retail and suggest the building heights are not backed up by robust evidence base. A number of comments from various parties were received on the Site Allocations for **Twickenham Riverside, Kneller Hall, Ham Close, Richmond Station, Homebase East Sheen, Sainsburys Lower Richmond Road, Stag Brewery, and Barnes Hospital**. The Department for Education support the allocations for schools at the Stag Brewery and Barnes Hospital. A number of detailed comments were received across the Site Allocations – from agencies such as TfL and Thames Water, to local groups such as Habitats & Heritage, and from individuals. A number commented on sites or uses that had been omitted from the Site Allocations, suggesting sites that could contribute to delivery or the landowner suggesting their site – Richmond Cricket Club, building next to the BP garage on Lower Mortlake Road, former car garage east of land on Sandycombe Road, Hanworth Homebase, Molesey Telephone Exchange, car park at Richmond Station/above Richmond Station, Fulwell Bus Garage and Lidl, above Sainsburys Uxbridge Road, detailed assessment of all town centres, Land to West of

- The rationale behind the inclusion of Site Allocations is considered to be sound and justified. No amendments to their inclusion, the principle for which is considered to be justified.

<p>Stain Hill West Reservoir, Upper Sunbury Road, Hydes Field Upper Sunbury Road, Richmond Park Academy, Christ's School, Mortlake Station area, LGC site, Arlington Works, Greggs bakery and the sports ground at Teddington Lock.</p>	
<p>Theme: Responding to the climate emergency and taking action</p>	
<ul style="list-style-type: none"> • Overall general support for the emphasis given to climate change and pollution from organisations (reflecting their ambitions) and individuals, although some comments raise how this interacts with other issues and requirements, such as fuel poverty and the biodiversity crises, and particularly around implementation including in historic buildings, Conservation Areas and applicability across wider sites and non-residential refurbishment and conversion. • Detailed comments on tackling the climate emergency (Policy 3) raise specific issues – decentralised energy networks, water management and flood storage. Comment about new development being a main area of planning control, and whether energy efficiency programmes on existing stock could be advanced. • General support for the measures to minimise greenhouse gas emissions and promote energy efficiency (Policy 4), including from the Mayor of London although should reflect the BeSeen energy monitoring guidance. However, a number of comments about the impact on costs and deliverability, going beyond London Plan standards for on-site carbon reduction and ahead of the Government's gradual transition, and particularly that the proposed carbon offset amount was too high, without flexibility and an evidence base to justify the approach. • On energy infrastructure (Policy 5), comment about requirement developments to contribute to future networks. • Some developer comments on the high sustainable construction standards (Policy 6), going beyond the London Plan, as onerous and costly, and about reliance on BREEAM. Specific comments on water stress and modular construction. • On waste and the circular economy (Policy 7), the Mayor of London supports the policy approach to whole life-cycle carbon assessments, safeguarding of existing waste sites and noting the West London Waste Plan/London Plan policies to assess proposals; the waste apportionment over the lifetime of the Plan should be accounted for. The EA comment on Construction Environment Management Plan for using the river to transport construction waste, and on preventing waste management activities causing 	<ul style="list-style-type: none"> • Updates to reflect the Council's ambition for a net-zero borough by 2043, and to reflect the Council's Net Zero Carbon study which supports the ambitious policy targets and specific standards. • Amends to reference flood storage along with flood risk (Policy 3). • Amends to reference the Building Regulations including on overheating and ventilation, reduce the threshold requirement for net zero minimum on-site carbon emission reductions from 500sqm to 100sqm for non-residential development, and requirement to disclose space heating demand over at least the 5 years of operation (Policy 4). Further supporting text recognises there is no one-size fits all solution to sustainable energy measures in the historic environment, it should not be presumed it cannot be found and will be assessed case-by-case. • Amends to clarify development of 500sqm or more of non-residential floorspace does include conversions, refurbishments, and major developments (Policy 5). • Amends to require evidence if a development is unable to achieve the Outstanding BREEAM rating and to apply to shell and core developments, and reduce the threshold requirement with regards to fabric efficiency standards from 500sqm to 100sqm (Policy 6). Added a summary table including all the climate change requirements for different types of developments. • Amends to add reference to Construction Management Plans for river transportation of construction materials and waste reference, the Refuse and Recycling: Storage and Access Requirements SPD, application of policies in the West London Waste Plan, and the Mayor's Whole Life-Cycle Carbon Assessment London Plan Guidance 2022 (Policy 7). • Amends to technical requirements with reference to sequential approach on specific sites, flood risk mitigation and resilience, sewer

<p>pollution and emissions. Comment safeguarding Arlington Works conflicts with the London Plan.</p> <ul style="list-style-type: none"> • On flood risk and sustainable drainage (Policy 8), specific issues raised relating to development including the setback of developments to the tidal river, Rewilding Arcadia project, approach to the islands, and risks of sewer flooding and storm surges and rising sea levels. The majority of comments are technical issues raised by the EA including on the sequential test and the sequential approach to the layout of sites, the approach to flood defences and flood storage, and recommend use of the ‘central’ scenarios for climate change allowances in line with Government advice. • On water resources and infrastructure (Policy 9), comments focused on water stress, water quality status, and wastewater networks. These raise issues of demand and supply planning including Water Resource Management Plans, the responsibilities for network connections and capacity, achieving good ecological status/potential requirements, connections between foul and surface water networks and impacts on combined sewage outfalls, guidance for bank protection works and for construction sites considering dewatering and run-off, and support for water efficiency measures. 	<p>flooding, separate fluvial and surface water flood risks, flood storage, functional floodplain, setbacks, basements, and a change from ‘upper end’ to ‘central’ climate change allowances (Policy 8).</p> <ul style="list-style-type: none"> • Amends to clarify on responsibilities around water supply, drainage and wastewater infrastructure for new development and improvements to water quality (Policy 9).
<p><i>Theme: Delivering new homes and an affordable borough for all</i></p>	
<ul style="list-style-type: none"> • Acknowledgement of the commitment to the borough’s housing target, to exceed as a minimum. A need to roll forward the target beyond 10 years. The broad locations for housing delivery (Policy 10) were queried by some residents/groups including identifying the impacts on existing infrastructure, while some developers felt the numbers were too low and the details were not clear, and particularly that employment land could provide a role. • The Mayor of London raises the approach to affordable housing (Policy 11) is likely to be an issue of general conformity with the London Plan, as the threshold approach to viability should be reflected in policy. There was largely support for the aims of delivering genuinely affordable housing, but concerns about clarity and delivery. A number of issues raised around implementation, including the lack of a Whole Plan Viability Assessment, approach to small sites and for public sector portfolio, almshouses, First Homes, listed buildings, and the tenure split. • A number of comments queried that the need for specialist older’ persons housing should reflect the London Plan benchmark (Policy 12). Some comments raised the need for other specific types of housing - particularly for people with multiple and complex 	<ul style="list-style-type: none"> • Updates have been made to reflect the latest Housing AMR 2021/22, the Whole Plan Viability Assessment and Local Housing Needs Assessment Update. • There is clarification on future housing delivery, particularly on the net housing target and unconstrained need figures, details added of the latest housing trajectory and rolling forward of the ten-year target (Policy 10). • There is additional reference to the inclusion of key workers in the Council’s latest affordability criteria and priority allocation for Intermediate Housing in the supporting text, and to clarify aspects of implementation of the policy such as evidence of RP discussions (Policy 11), • Amends have been made to clarify the policy approach for specialist and older persons housing, with reference to current housing priorities (Policy 12).

<p>physical and health needs, for older/less mobile to downsize, and students, and understanding impacts on infrastructure was raised. Query on the type of new housing the policy applies to and clarity on the application of legal agreements and higher standards.</p> <ul style="list-style-type: none"> • A few comments seeking clarity on the space standards particular around open space (Policy 13). • No comments on the dealing with loss of housing (Policy 14). • The Mayor of London comment there is no need to demonstrate parking is no longer needed on Infill and Backland Development (Policy 15). Two comments about protecting back garden land. • On small sites (Policy 16) a few comments about the types of development and its impact. The policy was supported by the Mayor of London. 	<ul style="list-style-type: none"> • Amends have been made to reference overheating, and the specific standards for inclusive access and supported housing (Policy 13). • Amends have been made to clarify environmental considerations and the impact of loss of housing (Policy 14). • On the approach to infill and backland development, amends for clarification on assessment of loss of parking and to reference modular construction and updated guidance (Policy 15). • Amends have been made to clarify the approach in areas beyond those identified for incremental intensification, and other guidance (Policy 16).
<p><i>Theme: Shaping and supporting our town and local centres as they adapt to changes in the way we shop and respond to the pandemic</i></p>	
<ul style="list-style-type: none"> • Specific issues were raised around support for the borough centres (Policy 17), with some reference to Class E, approach to other uses such as beauty salons and fitness studios, public realm and public toilets, and that the evidence base was not up to date. The Mayor of London supports the approach towards diversifying and repurposing centres. A comment the policy should include reference to major retail and leisure development also being directed to Site Allocations. Some place-specific comments, including defining the limits outside the secondary frontage of East Sheen, supporting a diversification of uses at Kew Gardens Station, beauty salons and fitness studios meeting community need such as Sandycombe Road and smaller centres, and that restricting convenience goods at Kew Retail Park is not supported by evidence. • Specific issues were raised in terms of development in centres (Policy 18) including reference to Class E, that more pro-active initiatives are needed in relation to empty premises, frontages only defined where they can be justified, dealing with out of centre development, not acknowledging trip generation of visitor attractions such as Twickenham Stadium, and that the evidence base is missing or piecemeal with particular concern the character of Richmond Town will be harmed by an imbalance in floorspace. Ideas put forward for a broad consideration of cultural activities or uses and highlighting of local assets. • General support for managing impacts (Policy 19) including consideration of the impact on residents, and on health and well-being, with suggestions to mention other specific 	<ul style="list-style-type: none"> • Significant amends to the retail policy approaches (Policies 17 and 18), to reflect further the Council’s research and the Retail & Leisure Needs Study phase 2. This retains a town centre first with a key focus on diversifying town centres. Primary Shopping Areas (replacing designated frontages) are defined for the larger centres with a comparison shopping role, where it is important to retain a compact retail core, and boundaries are defined for all centres and parades in the centre hierarchy within which commercial/community uses will be retained where possible. • Amends to updated capacity projections, the centre hierarchy, reference Primary Shopping Areas and Site Allocations, and the approach to refurbishment or redevelopment of vacant units (Policy 17). Twickenham Green is moved from a local shopping parade to a Neighbourhood Centre, and local shopping parades are renamed as Important Local Parades. • Amends to reference updated capacity projections, Primary Shopping Areas, resisting the loss of essential shops and services across the borough, markets, and to provide clarity on the sequential test (Policy 18).

<p>uses in terms of overconcentration, although some noted the Government’s flexibility and effect of Use Class E. The Mayor of London note the policy aligns with the London Plan on the Agent of Change principles. A comment opposing support for a night-time economy in Richmond Town, and a comment from McDonalds that the restrictive approach to hot food takeaways is not supported by evidence.</p> <ul style="list-style-type: none"> • On local shops and services (Policy 20) a comment supporting approach to pubs and a comment about business rates. 	<ul style="list-style-type: none"> • Amends for clarity on approach to overconcentration of uses and application to bars, including removal of specified frontages/areas subject to specific restrictions of public houses, bars and hot food takeaways, reference the Agent of Change principle, and update reference to the Council’s Licensing Policy (Policy 19). • Amends to add the definition of essential shops and services and clarify approach to implementation, including application to bars (Policy 20).
<p><i>Theme: Increasing jobs and helping business to grow and bounce back following the pandemic</i></p>	
<ul style="list-style-type: none"> • Some support for the principles of supporting the local economy and identified sectors (Policies 21 and 22), although others raised the policy does not recognise other sectors – leisure and tourism, and the voluntary and community sector. • Overall, some comments seeking flexibility and the recognition that some employment floorspace is not suitable for adaption/upgrade and/or not viable, including listed buildings, with some comments referring to the impact of pandemic (Policies 21 to 24). A comment the approach does not reflect the London Plan and should recognise some floorspace is no longer viable. The Mayor of London supports the focus of new office development in town centres, and the approach to industrial as supported by the London Plan. • A number of comments agreed with the overall principles but were suggesting sector and/or site-specific conditions necessitated a different policy approach in these cases, including on Platts Eyot, Greggs Bakery, St Clare Business Park, Onslow Hall, LGC, Shurguard, and Arlington Works. • General support for securing affordable, flexible and managed workspace (Policy 25), with some comments about the detailed implementation in terms of policy thresholds and targets, and viability. • General support for the approach to visitor economy (Policy 26) and the particular references to RBG Kew and Ham House. Some comments about existing facilities, in terms of travel and whether in sustainable locations. Comments requested references to particular issues/places including to provide support for infrastructure for the Royal Parks, expanding this area around East Sheen/Stag Brewery and Richmond Park, and Twickenham Stadium for appropriate development which complements the sporting and entertainment use. 	<ul style="list-style-type: none"> • Updates have been made to reflect the confirmed Article 4 Direction (Class E to C3), and the Employment Land and Premises Needs Assessment Update 2023, to reflect the updated employment needs for office floorspace, seeking to avoid any net loss (Policies 21 and 23, and Site Allocations where relevant). • Amends have been made to reference the voluntary and community sector (Policies 21 and 22), logistics hubs supporting last mile delivery (Policy 22), active travel (Policy 23). • The Sandycombe Centre, Sandycombe Road, Kew has been removed as a designated Locally Important Industrial Land and Business Park as it has been redeveloped for non-industrial uses (Policy 24). • On the visitor economy, amends have been made to refer to the refresh of the Visit Richmond Strategy and updated hotel accommodation projections (Policy 26).

<ul style="list-style-type: none"> • Support for the approach to telecommunications and digital infrastructure (Policy 27), with some comments on the details of assessments particularly the visual impact. 	
<p><i>Theme: Protecting what is special and improving our areas (heritage and culture)</i></p>	
<ul style="list-style-type: none"> • Some support for the policy approach to local character and design quality (Policy 28) or specific aspects it addresses such as shopfronts, lighting. Historic England consider the Plan provides a strong basis for conservation and enhancement of the historic environment. A number of comments on specific issues – seeking reference to enhancing where appropriate, following Secured by Design and early engagement with the Met Police on major development, the protection of the Royal Parks, Conservation Areas as well as the Urban Design Study places and character areas, healthy places and the requirements of health organisations, gated developments, banners, and digital advertising. • Some support for the policy approach to designated heritage assets (Policy 29). Specific details raised – wording around change of use, dealing with substantial harm, threat of climate change and the balance with sustainability and other needs, and issuing enforcement notices. Comment policy not compliant with the NPPF, and too specific wording around reinstatement of historic features • Specific issues raised on non-designated heritage assets (Policy 30) – no reference to historic industrial sites and watercourses, issuing enforcement notices, and historic walls. Comment the policy not consistent with the NPPF and should refer to significance and a balanced judgement. • General support for the approach to Local Views and Vistas (Policy 31), and the importance of CGI and 3D modelling to assess visual impacts. Historic England and the Mayor of London seeking detailed wording. Interest in the forthcoming Local Views SPD and some comments on specific views – importance in the Royal Parks and opportunities in the River Crane corridor, and threats from outside the borough. Comment the policy is too prescriptive and should be redrafted in line with the London Plan. • Support for the policy on Royal Botanic Gardens, Kew World Heritage Site (Policy 32) with detailed comments from Historic England, RBG Kew and the Mayor of London on specific aspects, including RGB Kew seeking a degree of balance in dealing with the management of the WHS. • On archaeology (Policy 33), comment on allowing time for field investigations. 	<ul style="list-style-type: none"> • Amends to clarify developments should maximise opportunities to enhance the local environment and character, and to reference Secured by Design (Policy 28). • Amends to clarify in relation to total loss of or substantial harm to a listed building and the optimum viable use (Policy 29). • Amend to reference the borough’s historic industrial sites and water courses in the supporting text (Policy 30). • Further to the Council’s consultation on the draft Local Views SPD in 2022, added a list of ‘new’ local views for designation. Amends to reference harm to quality of views and vistas/setting of a landmark, provision of Accurate Visual Representations, and how non designated views are assessed (Policy 31), • Amends to reference current site management plan for Royal Botanic Gardens, Kew World Heritage Site, (Policy 32). • Amends to reference the updated Archaeological Priority Areas (Policy 33).

<p><i>Theme: Increasing biodiversity and the quality of our green and blue spaces, and greening the borough</i></p>	
<ul style="list-style-type: none"> • Overall general support for protecting and recognising the value of green and blue spaces, with emphasis on the multi-functional network and the acknowledgement of pressures, including by the Royal Parks, FORCE, the PLA, the EA and Habitats & Heritage. The Royal Parks suggest a stand-alone policy due to the importance of the Parks. • There are broad supportive comments and some detailed issues raised on blue and green infrastructure (Policy 34) – including dark corridors used by bats and other species, green corridors, wildlife corridors, impact of artificial lighting, invasive species and dogs, larger sites and their connectivity, significance of the Crane Valley, the public open space hierarchy, attenuating flooding by naturalising the River Crane below the Mereway Weir, and naturalising riverbanks, inappropriate tree planting and barriers to enhancements. • Some support for the protection of open land designations (Policy 35) including by the Mayor of London. Detailed comments relate to cycle storage and accessibility for disabled persons, exceptional circumstances, visual impacts of developments on sites in proximity, flood storage areas, and the policy wording should match the London Plan and NPPF. The Local Green Space (LGS) sites proposed are supported generally by Habitats & Heritage, with specific support for Udney Park Playing Fields to be retained as LGS. Additional designations as new sites/removals are suggested – Teddington Library Gardens as an additional LGS; Mortlake playing fields should be designated as LGS; Putney Town Rowing Club should be an additional MOL; David Lloyd Club should be removed from MOL; Petersham Nurseries should be removed from MOL; RFU eastern edge should be removed from MOL; Hampton Water Treatment Works should be removed from the Green Belt; removal of and the MOL assessments for Fulwell Golf Club and Longford E & Schools contain inaccuracies; retitle the MOL assessments for Little Green and Thames Old Deer Park and queries the details of the Old Deer Park MOL assessment; the former Thames Water Operational land adjacent to west of Sunnyside Reservoir, Lower Hampton Road should not be in the Green Belt. • Comments on Other Open Land of Townscape Importance (OOLTI) (Policy 36) related to the nature conservation criterion, re-provision and defining openness, quantum and timing. Support for the Ellerman Avenue becoming OOLTI. • General support for the approach to public open space (Policy 37), including by Sport England noting the evidence base is being kept up to date, and by the Mayor of London 	<ul style="list-style-type: none"> • Amends to clarify approach to non-designated sites, measurable enhancements, green corridors and natural riverbanks (Policy 34). • Removal of one site from MOL, with two other minor changes to MOL boundaries; and 6 proposed new Local Green Space designations, along with amends to refer to improving accessibility and cycle storage (Policy 35). • Designation of the OOLTI at Ellerman Avenue (Policy 36). • References are added to the emerging Playing Pitch and Outdoor Sports Strategy, and future Action Plan Updates, and to add the Public Open Space (POS) deficiency mapping to reflect the updated Open Spaces Assessment. Amends to reference active environments, catchment mapping, updated accessibility standard distances, community use agreements and artificial 3G pitches, and extend the POS designation at Heathfield Recreation Ground (Policy 37). • Amends to reference biodiverse green roofs (Policy 38). • Updates to reflect the Nature Conservation Sites Review, along with amends to reference importance of ecological corridors, dark environments and swift bricks, and clarify the mitigation hierarchy for non-designated sites and SINCs and the application of policy including emphasis on a measurable net gain for biodiversity (Policy 39) • Amends to promote the link between protecting and enhancing river corridors for design reasons as well as biodiversity, flood risk benefit, improvements to public spaces, add reference that riverside access should be at all times, drowning prevention measures and supporting de-culverting (Policy 40). • Amends to reference biodiversity of waterbodies (Policy 41). • Amends for clarity and to reference historic parkland, support for hedgerows, increasing tree canopy cover and the Council’s future Tree Planting Strategy (Policy 42).

for play and informal recreation. Support for improving underutilised spaces and securing wider community needs through community use agreements. Detailed comments relate to active environments, impacts of excessive wear-and-tear, increasing green space, biodiversity, and encouraging the Council to take responsibility for maintenance. Site-specific comments relate to the Royal Parks, Udney Park Playing Fields, Heathfield Recreation Ground.

- Comments on urban greening (Policy 38) only relate to the benefits of urban greenspace, and the details around the policy implementation including relating only to major development, no evidence to justify the restrictive 70% requirement, and the ways it can be supported.
- General support for the policy approach to biodiversity (Policy 39) including the 20% BNG beyond Government requirements, although comments also raise whether this is feasible and viable without evidence. A number of comments related to dark corridors and/or dark spaces, with suggestions for areas for restrictions of light pollution. Detailed issues raised include biodiversity potential as a baseline, measurable BNG and DEFRA metric 3.0 the mitigation hierarchy, offsite contributions, submitting data to GiGL, riverside areas, reducing deficiencies in access to nature, integrated nest boxes, buildings-based species, management by site owners, and geodiversity. A number of site-specific comments were raised (analysed against Appendix 4) in support of proposed designations/upgrading including Udney Park, Fulwell and Twickenham Golf Courses, Twickenham Junction Rough, Portlane Brook and Meadow, Richmond Park and Associated Areas, Bushy Park and Home Park, Longford River in Richmond, and all the candidate Sites of Importance for Nature Conservation (SINCs). Some comments specified that parts of the sites should not be included. Comment objecting to upgrade of Hampton Water Treatment Works and Reservoirs. Some comments on Barn Elms.
- Detailed comments on rivers and river corridors (Policy 40), including water quality and undeveloped buffer zones, the multiple benefits of protecting river corridors, river-related industry and protection of slipways, securing public access, ambitions applicable to the River Crane, GLA's Green Grid, groundwater hydraulic flow systems, barriers to movement, drowning prevention, cross-borough working to gain benefit along the river, covered rivers, the overlap with Marine Planning, and site-specific conditions at Platts Eyot.

- Amends to reference need to demonstrate no unacceptable harm in an application, reference to importance of dark environments and to current technical guidance (Policy 43).

<ul style="list-style-type: none"> • Detailed comments on moorings and floating structures (Policy 41), in relation to riverside structures, enforcement action, limited powers regarding appearance of boats, approach to new or extensions to houseboats, moorings and piled bank protection methods causing shading. • Comments on trees, woodland and landscape (Policy 42), a policy approach welcomed by the Woodland Trust, related to details on ancient and veteran trees, increasing canopy cover, source of stock, and protection of hedgerows. • On floodlighting and other external artificial lighting (Policy 43), most of the comments raise concern about the impact of lighting on biodiversity and how the policy will be implemented, although Sport England consider the positive benefits of sports lighting. Specific issues raised – how harm can be demonstrated, a precautionary approach, existing baseline and temporary installations, need for lighting, newer forms of LED lighting, reducing light spill, and protection of dark corridors. 	
<p><i>Theme: Improving design, delivering beautiful buildings and high-quality places</i></p>	
<ul style="list-style-type: none"> • Comments around the subjective nature of design, some raised it was not clear how proposed developments would be assessed including for smaller developments and who is involved (Policy 44). The virtual event feedback considered what was important to ‘good design’ including materiality, sense of connection and community, and sustainability. • Comments were mixed about the tall and mid-rise building zones (Policy 45). Some felt the policy should not set maximums and is too prescriptive; the Hillingdon judgement was referred to as making it clear tall buildings can be found to be acceptable in areas that are not identified where they meet the London Plan. Some respondents felt the Urban Design Study was flawed, including the character assessments and sensitivity, and should not be used to reference acceptability of tall and mid-rise buildings, and while some agreed with the principles, they felt it lacked detail in the supporting evidence to underpin specific zones. Historic England support the policy and provides appropriate criteria to positively manage the conservation of the historic environment and consideration of local character, with comments on where to improve including to avoid harm to vistas and views; the Royal Parks, RBG Kew and the National Trust also comment on assessing the impact on views and heritage assets. RBG Kew request further information and justification on heights for zones in proximity to Kew Gardens. The EA raise the biodiversity of setting tall buildings back from the river, and FORCE 	<ul style="list-style-type: none"> • Amends for clarification, which have increased emphasis on early engagement with the Council, and inclusion of the London Plan fire safety requirements during design stage (Policy 44). • Amends have been made to refer to the setting of heritage assets and fire safety requirements (Policy 45). • Amends have been made to the Urban Design Study, to the character area profiles and design guidance, in the form of an updated 2023 version, with enhanced graphics to aid usability. This includes: <ul style="list-style-type: none"> ○ Profile area for Teddington Town Centre amended to identify poor quality existing developments and lack of legibility, and design quality review for Informer House updated to reflect built scheme. Additional wording has been added to the Teddington Railway Side Mid-Rise Building Zone, to reference heights of recent/existing developments and to state that proposed buildings should respond to surrounding context, stepping down in scale where appropriate to lower prevailing context. In Teddington Residential views from Bushy Park added as particularly sensitive. ○ Twickenham, Strawberry Hill and St Margarets Area the overall sensitivity to change has been amended from medium to high. Design

<p>would like the criteria applied to the River Crane, recognising the impact of tall buildings on adjacent open spaces.</p> <ul style="list-style-type: none"> • A number of site-specific concerns were raised (analysed against Appendix 3) commenting on the scope for a higher number of storeys/wider scope (often the landowner) on Greggs, Kew Retail Park, LGC site, and The Stoop, or that there should be a lesser maximum height/scope of the zones (often residents) on Kew Retail Park, Stag Brewery, Richmond Station, North Sheen (Lower Richmond Road), Teddington (railway side), and The Stoop. • Impact on neighbour amenity and overlooking from first floor terraces raised, as implied not normally acceptable yet the assessment is subjective and permitted in a specific case (Policy 46). 	<p>guidance for Twickenham Residential has been expanded to refer to Twickenham Stadium.</p> <ul style="list-style-type: none"> ○ Amended wording to the Ham Close Mid-Rise Building Zone to consider impacts on views and settings of Ham House as well as demonstrating positive benefits in terms of townscape and local context. ○ Amended design brief for Richmond Town Centre & Riverside to emphasise Conservation Areas. Amended wording to the Richmond Station Tall and Mid-Rise Building Zone to clarify the importance of the BTM and to provide flexibility for a comprehensive redevelopment of the site. Amended character strategy for North Sheen Residential to enforce opportunity to create a local centre. The Tall and Mid-rise Building Zone at North Sheen (Lower Richmond Road) has been amended to set the buildings further back from the railway line and to sufficiently take account of the BTMs and prevailing heights, with the wording amended to refer to need for a detailed townscape, visual and heritage assessment of impacts including on Kew WHS. ○ Features contributing to sensitivity updated for wider context of Kew WHS. Negative qualities section of character profile for East Kew Mixed Use updated. Added wording to Tall Building Zone to need for views from Kew WHS to be assessed. ○ Corrected typo in the Stag Brewery Tall Building Zone to 7 storeys. Added wording to the Mid-Rise Building Zone to require buildings step down sensitively to the riverside and respect the local character. • Reworded to separate the different types of amenity impact and clarify the unacceptable impacts on neighbours' dwellings as a whole. Added cross-reference to the agent of change, along with a new section on noise and plant equipment and update to the (Policy 46).
<p><i>Theme: Reducing the need to travel and improving the choices for more sustainable travel</i></p>	
<ul style="list-style-type: none"> • General support for the policy approach to reducing the need to travel and improving choices for sustainable travel (Policy 47). A number of suggestions for improvements/issues to address, particularly to support cycling and walking, including: 	<ul style="list-style-type: none"> • There are additional references to clarify cycle standards, vulnerable road users and accessibility, coaches, and approach to safeguarding land and refuelling stations (Policy 47).

<p>safeguarding existing transport infrastructure; bus operations can be made more efficient; mitigation informed by a multi-modal assessment; inclusive mobility; impact of traffic and associated air pollution on designated sites and priority habitats; taxis; coach parking; congestion and highway safety; standards for cycling proposals; the walking and cycling network; river corridor opportunities for active travel including River Crane and DNR; need to consider cross-borough active travel links.</p> <ul style="list-style-type: none"> • Highways England confirm policies and allocations will have no boundary issues related to the Strategic Road Network, but along with TfL consider exploration of borough-wide assessment and modelling would be useful in understanding impacts. • TfL welcome the intention to adopt London Plan parking and cycling standards and encourage car-free development (Policy 48). A number of comments on specific areas relating to how the policy would be operated, including excessive paving, the approach to car clubs, car-free development, electric vehicle charging and parking, delivery and servicing, cycle parking and storage, Controlled Parking Zones and disabled parking spaces. 	<ul style="list-style-type: none"> • Further work has been undertaken to assess the trip generation arising from the potential Site Allocations in the Plan, as the Habitats Regulation Assessment identified that a potential negative effect on the protected Wimbledon Common Special Area of Conservation (SAC) could not be ruled out without an assessment of the in-combination air pollution effects. This assessment has now been undertaken, using TfL models which confirmed that the changes in traffic on local roads are significantly less than the 1,000 AADT screening criteria. Therefore, in the updated Habitats Regulation Assessment the air quality impacts have now been screened out, with no further / appropriate assessment required. • Amends for clarification around electric vehicle charging points, cycle parking, car clubs, delivery and servicing plans, construction management plans, and crossovers (Policy 48).
<p><i>Theme: Securing new social and community infrastructure to support a growing population</i></p>	
<ul style="list-style-type: none"> • Providers raise comments on how policy requirements (Policy 49) apply to their service needs/estates, seeking flexibility for alternative uses such as residential, and from the Met Police seeking contributions to cover policing infrastructure. • Education provision (Policy 50) raised in terms of identifying sites/admission priority including for the Stag Brewery. 	<ul style="list-style-type: none"> • The approach to Local Employment Agreements has been clarified (Policy 50).
<p><i>Theme: Creating safe, healthy and inclusive communities</i></p>	
<ul style="list-style-type: none"> • General support for the policy approach to health and wellbeing (Policy 51). Some comments raised about the impacts of the ageing population including their ability to walk and cycle and how impacts are assessed. Some issues raised that are not covered in detail – community safety, housing standards, and public toilets, healthy food neighbourhoods and school super zones. • On allotments (Policy 52) support for their retention but issues raised about investment, their statutory designation, and waiting lists. • On local environmental impacts (Policy 53), detailed comments were mostly from the Port of London Authority, Thames Water and the Environment Agency, raising clarification around implementation including odour impact assessment, sensitive receptors, groundwater impacts, and waste sites. 	<ul style="list-style-type: none"> • There are additional references to healthy housing and reflect the current context for health bodies and strategies, with additional details on community safety and supporting safer neighbourhoods (Policy 51), • Amends to update the context for allotments with reference to the Council’s updated Allotment Strategy (Policy 52). • Amends for clarity including to reference the agent of change applies to noise and other nuisances, consideration of risk to water quality, and mitigation of groundwater from contamination (Policy 53). • Amends to cross-reference protection from sewer flooding covered by Policy 8 (Policy 54).

<ul style="list-style-type: none"> On basements and subterranean developments (Policy 54), detailed matters raised on demonstrating a scheme will not puncture/degrade a sealed/isolated aquifer or increase/exacerbate flood risk, and installation of a pumped device where there is a waste outlet from a basement. 	
<i>Implementation, Delivery and Monitoring</i>	
<ul style="list-style-type: none"> The impacts on particular infrastructure raised by The Royal Parks and the Clinical Commissioning Group (CCG). 	<ul style="list-style-type: none"> The section has been expanded to address the implementation of the Plan and to reflect the update to the Council’s Infrastructure Delivery Plan.

4. Summaries of responses received in relation to the strategic vision, strategic objectives and the Council’s response

(Taken from the detailed comments in Table 1 to Q4 on the response form)

<i>Summary of responses</i>	<i>Summary of Council’s response</i>
Strategic Vision	
<ul style="list-style-type: none"> Some general support for the vision, as appropriate for the borough and its population. Some support for particular emphasis in vision, including on climate change and responding to change, the 20-minute neighbourhood, heritage and culture, affordable housing, green infrastructure. Some suggestions for improvement and issues to address – sustainable energy sources, sustainable drainage, changing age profile, work-location preference of residents, accessible open spaces, adult education and training, our role in London, small/local business opportunities, inward investment, flood risk, waste, community services, broadband connectivity, unviable office space, urban greening, variety of shops, wildlife and dark corridors, inclusive access, air quality, noise pollution. Some felt the 20-minute neighbourhood was not clear, including on public transport and concerns about accessibility (<i>see also summary below against Policy 1</i>). A few comments around housing density and types, over-development concerns etc. 	<ul style="list-style-type: none"> Add reference to reducing flood risk in the vision in relation to responding to the climate emergency. Reflect the Council’s commitment to a borough wide net zero target of 2043. Add reference to improvements to public transport. Add a reference to health and care services and a contribution to reduced health inequalities.

<ul style="list-style-type: none"> • Some criticisms that it is too light, rings hollow, meaningless without measurable targets, and could be bolder; while others felt this section of the Plan difficult to comprehend. • Other issues also noted – whether will be fairly experienced across the borough, whether proper consultation on detailed schemes, about enforcement of policies (on particular site proposals), taking direct landlord responsibility, issues around particular sites. 	
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(Taken from the detailed comments in Table 2 to Q5 on the response form)

Summary of responses	Summary of Council's response
Strategic Objectives	
<ul style="list-style-type: none"> • Some general support for the strategic objectives, or support for some of them but not all. • Some support for particular emphasis, including on climate change, the 20-minute neighbourhood, heritage and culture, affordable housing, increasing biodiversity, accessible green spaces, active travel, and partnership working and role of the voluntary sector. Suggestions the climate emergency should take priority over other policies (including protecting heritage), but also a suggestion standards should align with the London Plan and consider as part of the planning balance when determining applications. Mayor of London notes the themes and objectives align well with the London Plan Good Growth policies. • A few comments around need to recognise the existing context, existing housing stock and limitations of new development. Need to be clear on what accommodating growth means, with concerns around development impacts and the need to safeguard existing occupiers. • Some criticisms that it is too light/vague/woolly, rings hollow, not measurable, could be contradictory and need to acknowledge competing objectives, out of date since the pandemic. A suggestion focusing on wrong things and ignoring what is important for residents. Others felt this section of the Plan difficult to comprehend, a suggestion the details should be moved out into SPDs so they can be updated more often as the context changes. 	<ul style="list-style-type: none"> • Add reference to the importance of dark spaces for some species in relation to protecting and enhancing biodiversity. • Add reference to engaging with local community groups who are invested in the protection and enhancement of local green and blue assets. • Add reference to flood storage as one of the multi-functional benefits in relation to rivers. • Add reference to climate resilience in relation to high quality development. • Add reference to opportunities for safer use of spaces in relation to our environments. • Add reference to health and care services in relation to health as a cross cutting priority. • Clarify the reference to amenity impacts is also those living, working or visiting the surrounding area. • Remove some references to the pandemic.

- Some suggestions for detailed issues to address (*grouped here by the themes*):
 - *Climate Emergency*: more specific on measurable commitments from the Climate Change Emergency strategy, address energy efficiency, address river pollution, strategies for surface flooding, refer to retro-fitting heat pumps, reducing flood risk and natural flood management techniques with reference to the requirements under the Water Framework Directive, link the climate change and biodiversity loss crises.
 - *New homes*: more emphasis on affordable housing, issue of vacant properties and property as in investment, integrate flats with need for family homes, reflect London Plan requirement to optimise.
 - *Town/local centres*: (none noted)
 - *Jobs/businesses*: focus on refurbished/viable office space, consider workplace parking levies.
 - *Heritage and culture*: wasteful energy use in digital billboards.
 - *Green and blue spaces*: obligations around preventing adverse air/water/noise pollution on nature conservation sites, issue of impact of street lighting on insect populations, importance of green spaces that are safe, use of river for transporting goods, prioritise natural spaces over man-made spaces (e.g. astroturf pitches), recognise flood storage.
 - *Design*: refer to resilient to climate change.
 - *Travel*: mention VisionZero and pedestrian safety, need to recognise transport needs of elderly and less mobile residents, target for reducing car ownership per household, need to increase levels of walking and cycling, charging points for electric vehicles.
 - *Social infrastructure*: identify shortfalls in infrastructure and community facilities and find places for those identified needs, ensure adequate facilities to support new development, prioritise facilities for youth needs.
 - *Communities*: reduce impact of air/noise/light/odour pollution, mention new allotments, support development that promotes healthy lifestyles and reduces health inequalities, emphasis on development that does not have a negative impact on health etc.

- Other issues also noted – need for disaster planning and allocation of resources, issues around particular sites, and some specific issues that are beyond the remit of planning policy.

5. Summaries of responses received in relation to Policies 1 and 2 and the Council’s response

(Taken from the detailed comments in Table 3 to Q6 on the response form, along with the engagement events report)

(See also section 7 for the detailed response form comments on Policies 1 and 2)

Summary of responses	Summary of Council’s response
Policy 1. Living Locally and the 20-minute neighbourhood	
<ul style="list-style-type: none"> • Broad support for the concept in principle, recognising benefits including encouraging walking and cycling to enable a modal shift, making it easier to be physically active, and improving accessibility/connectivity of green infrastructure. • Many respondents raised concern about the elderly, those with disabilities, those less mobile/able to walk or cycle for 20 minutes – which should be addressed in the policy. A comment people may also just not wish to walk or cycle; a comment about being able to carry grocery shopping for example. Concerns about the risk of social isolation. A comment that space is needed in new development for vehicles to drop off/collect less elderly/mobile; a comment about carers who need a vehicle. A comment that not everyone who is mobility limited has a blue badge. A comment about downsizing and doing more to encourage housing suited to older residents. A comment that not everyone is able to cover the same distance in 20 minutes, particularly those with pain/exhaustion, concerns about falling over, crime, accidents etc. and the condition of roads and pathways to be improved, well-lit and maintained, with seats, accessible toilets, more time at crossings, to enforce the ideal of ‘pavements for people’ – a suggestion to seek the views of Disability charities/organisations. • Many respondents raised public transport – buses and trains – which should be addressed in the policy. A suggestion should be a commitment to 20 minute bus rides, a smaller fleet of electric buses running at high frequency 	<ul style="list-style-type: none"> • Consolidate some of the core concepts of the living locally policy under part B to aid clarity. • Add reference in the policy to people who experience reduced mobility to the policy. • Add further reference in the policy to expectations for a mix of uses, across areas and on sites. • Add an information box for the Regulation 19 consultation to clarify the policy is not seeking to restrict movement. • Add reference in the supporting text to how the 800m relates to the borough, but this is not measured as an absolute geography, and there are no fixed zones or boundaries. • Add a paragraph detailing where applicants can demonstrate compliance with Criteria C. • Add a paragraph to the supporting text on mixed uses. • Add a paragraph to the supporting text on people with reduced mobility.

on all major roads. A comment raised the protection of rail services, with cuts to Fulwell undermining efforts to reduce car use. A comment that as most locations are within 800m walking distance of a train/tube and the few areas beyond are feasible to walk/cycle, every area of the borough should be considered for housing.

- Some expressed concerns, including that this is idealistic, that people should make their own decisions about where they live, and it should not become parochial given the outside investment brought by visitors and tourists. A comment that the policy risks creating 'islands' with the Council's ability to make investments limited, but the Council can help by reducing business rates. A number of respondents raised that as part of living in London people will travel elsewhere for jobs, culture etc. into London or Surrey, although a comment that post pandemic people may still stay local e.g. for leisure. A comment that changes in behaviour for the past 2 years were forced. A comment that the approach is a town centre first vision and should be named a 15-minute city approach. Some concern it should be about 10 minute one-way trips, but this has been doubled. A comment that offering 30 minutes free parking undermines the objective, and the bays could be used for public realm (parklets, tree planting, cycle parking). A comment that car-free development leads to parking elsewhere, and car use is often required e.g. to reach large supermarkets, for family-orientated transport.
- Some comments related to the infrastructure and services, and clarification around facilities needed. A number of comments highlighted that the offerings in the smaller centres and parades should be improved, and protect corner shops, another suggestion about provision of banks. Comments also about good access to health and education. A couple of comments about whether low-rise residential or high density etc. with a comment noting there needs to be a large enough population to support the concept. The Richmond CVS comment that development should demonstrate their understanding and awareness of voluntary and community sector provision locally and how investment in existing community buildings, spaces and infrastructure will support living locally. The CCG wish to raise what it means for healthcare services and models of

care, with opportunities for the NHS to become directly involved in the high street – running health services and the design of healthy places. A comment that the policy does not incentive local living or less car-use, and needs to set out what services are needed and what new hubs need to be set up. A comment about the need for analysis of facilities provide to achieve the range and quality.

- Other specific comments also noted. A suggestion to provide more local jobs and discovery of other areas in the borough. A comment should provide mixed-use development including workspaces like artist studios, workshops. A comment this is merging the urban villages to create bigger town planning units. A comment that those commuting into central London earn more, and encouraging local employment will affect financial security and retirement incomes and ultimately lead to a higher social care bill. A comment about isolation and widening gap between rich and poor. A need for affordable housing to avoid gentrification. Map under 4.1 should be done on actual walking distances. A comment that post-pandemic local employers find staff leave for better paid jobs in central London. A comment on managing green infrastructure accessibility in a way that does not impact on biodiversity, particularly avoiding lighting that has a negative impact on nocturnal wildlife. A comment there needs to be sufficient green space and amenities e.g. public toilets. A comment developers should show how plans for large development have designed out crime. A comment that proposals must demonstrate how they will improve local walking and cycling routes in all PTAL levels. A comment to include the ‘Healthy Streets’ Transport Assessments for major developments (10+ residential, non-res of 500sqm+). A comment about high rates of bike theft. A comment also about needing safe and secure bicycle storage e.g. subsidised bike lockers, a valet cycle hub/repair/hire service. A comment on improving walking and cycling routes, including cut-throughs in new development. A comment that the needs of pedestrians and public transport users and drivers should not be deprioritised. A comment that more is needed on how to link walking/cycling to the rail/tube network i.e. secure cycle storage.

<ul style="list-style-type: none"> • Some comments received about particular areas and sites. A concern about the western fringe of the borough becoming more isolated for older people. A comment that Whitton isn't well served by public transport so the policy doesn't tie in. Royal Botanic Gardens Kew comment that while encouraging visitors and staff to travel by walking, cycling and public transport it is not possible to enforce, and applications for temporary events and installations may not be able to deliver improvements to support living locally. RFU comment there should be exclusions for Twickenham Stadium. A comment on the opportunity to increase and diversify the area of Twickenham Green. A comment the Arlington Works site has the potential to contribute towards the 20-minute neighbourhood of St Margarets. Ham and Petersham Neighbourhood Forum note the parallels with neighbourhood planning and the constraints and context for residents of Ham and Petersham. A comment on encouraging a better mix of shops in Teddington – greengrocer, butcher, clothing. A comment about Kew and the impact of losing the retail park shops, leaving only corner shops, leaving residents to travel to larger supermarkets. A comment that in Kew the distance to the station and bus stops for older people can be daunting. A comment also that in Kew the thriving local parade is weighted towards coffee shops for tourists. A comment that the East Twickenham public realm improvements should be replicated – to improve the pedestrian environment on all High Streets, including Broad Street as a potential priority area, and noting issue of free car parking and narrow footways along Hampton Hill Street. A comment that the Elleray Hall replacement is a less convenient location than present building. There were also comments supporting Park Road Surgery to move (Site Allocation 9) for the benefit of living locally. • <i>Virtual event feedback:</i> There was also general support for the 20 minute neighbourhood policy. 	
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(Taken from the detailed comments in Table 4 to Q7 on the response form)

Summary of responses	Summary of Council's response
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Policy 2. Spatial Strategy: Managing change in the borough	
<ul style="list-style-type: none"> • Some broad agreement with the policy. Some respondents identified particular aspects of the policy they agreed with – brownfield land, embodied carbon, protecting open spaces, the biodiversity crisis, infrastructure, affordable housing, and accessibility. • A few noted the challenge and competing issues. Some differing views towards development. A number commented did not agree with high-rise/high density development and felt the area is already overpopulated. Some individual comments the approach is not reflected in relation to a particular site – Twickenham Riverside, Stag Brewery. Some reference to sensitivity to design and character, and impact on views. Some responses raised there are places and existing development outside of centres which do not have good public transport connections. • A number of particular issues were raised – the conflict between retrofit and historic buildings/Conservation Areas, reduction in train services, need for health and social care facilities locally, avoid development in areas that would encourage motor vehicle use, taking into account e-cycles, retail forecasts given on-line shopping, urban hedgerows and nature-connected neighbourhoods, oases of nature, open space deficiency areas, affordable housing forcing poorer families into spaces a fraction of the size of others, risk of maladaptation from presumption in favour of refurbishments, and using sites/buildings for shared use. 	<ul style="list-style-type: none"> • Update the supporting text to reflect the new and updated evidence base. • Update the Key Diagram to reflect updates to other map designations. • Delete the Alternative Policy Options to the Spatial Strategy, as that section was included in the Regulation 18 Plan to inform consultees of the issues being considered, and stated it would be removed.

6. Summaries of responses received in relation to the Place-based strategies and Site Allocations and the Council's response

(Taken from the detailed comments in Table 5 to Q8 on the response form)

Summary of responses	Summary of Council's response
<ul style="list-style-type: none"> • Many respondents agreed with the overall approach to the place-based strategies and Site Allocations. The Ham & Petersham Neighbourhood Forum support the vision that builds on the Neighbourhood Plan and references the policies and community proposals. Some comments picked out particular points that they agreed with including the River Thames, habitat corridors, reducing 	<ul style="list-style-type: none"> • Added as new Site Allocations Fulwell Bus Garage Homebase, Hanworth and Molesey Telephone Exchange as they are a similar type of site to other allocations. • Update the Key Diagram to reflect updates to other map designations.

<p>car dominance, mixed use development, routes for walking and cycling, pedestrian permeability, high street pedestrianisation, and interchanging with/promoting bus and train use.</p> <ul style="list-style-type: none"> • Some respondents disagreed with the separation into ‘places’, with a comment it could lead to division with areas protecting own interest, a comment that places don’t exist in isolation and would I be banned from somewhere more than 20mins walk, a comment that means the Council is moving away from liveable neighbourhoods and disadvantaged areas such as Heathfield and Hampton North are likely to lose out. A comment areas of outer London are suffering decline as many young people prefer to live in central London and this has skewed the demographics, and would expect to see more details on how different areas will be regenerated. A comment Twickenham Stadium and surrounds should form part of its own character area or specific exceptions referenced to properly enhance the sporting role. A comment the strategies have been put together using old information and engagement and research has not taken place. A comment on the key diagram that areas for intensification should not overshadow MOL and Green Belt. • Some felt there was inconsistency in how some measures had been included in the place-based strategies or what had been mentioned in Site Allocations e.g. cycling and walking. Some respondents raised issues not mentioned – biodiversity, residents needs for access to GP and police, a report on reducing car dominance in Hampton – Hampton Hill, outdated/unviable office accommodation could be converted to other more viable uses, and public transport improvements including the benefits of Crossrail 2. • Some comments specifically relating to the Urban Design Study, including a query about its status and relationship to existing Conservation Area Appraisals, and some comments about sensitivity. A comment about overdevelopment of the town centres. A comment the proposals for key sites replicate the aspirations of developers facilitating approval of their proposals. • Additional sites were suggested: <ul style="list-style-type: none"> ○ Hanworth Homebase for mixed use residential with affordable housing/commercial (as a large element of surface car parking, and as seen 	<ul style="list-style-type: none"> • Proposed change to boundary to remove the small portion of OOLTI/POS from Site Allocation Hampton Square. • A number of comments relate to broader issues which have been covered in other parts of the Plan, or in responses to other comments, or matters beyond the remit of the Local Plan. Some points are covered by the updated Infrastructure Delivery Plan. • It is considered that the character areas and places have been informed by the Urban Design Study and are an appropriate geography. Aspects including design guidance and sensitivity to change for particular areas have been updated in the Urban Design Study 2023 to reflect comments raised. • It is considered the place-based strategies and Site Allocations set out an appropriate level of detail to guide future development, without being overly prescriptive, and signpost where further work such as a masterplan or site development brief may be developed.
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on other Homebase sites in Richmond and in Kingston there is desire of the landowner to convert the sites).

- Molesey Telephone Exchange in Hampton (as other telephone exchanges that may be disposed are included).

- Some comments on specific places/sites:

- Richmond: devil in the detail getting the right balance between attracting visitors but not to the detriment of residents. Piloting clean air zone good in principle; the biggest polluters are the heavy goods vehicles and buses.
- Richmond College: are we happy the artificial grass pitch (3G) mentioned is appropriate, given importance for good drainage, whether the extra revenue or maintenance cost savings justify in an area liable to flood.
- A flood channel parallel to the Thames upstream from Richmond was recommended in 2010 but still not approved – is this Plan the place to address that? (partnership with EA, Thames Water Utilities and TfL)
- Teddington Weir mentioned in the SFRA as an asset that needs improving – what's the plan?
- Fulwell: strategy is unclear and poorly developed (in Hampton Hill area), what might be enacted and can have more explanation on the vision?
- Hampton Square: contains an implicit intention to develop the part that is designated as OOLTI and contains a much-used children's playground.
- Cassel Hospital: in line with the Site Allocation should reflect that potential redevelopment for residential uses could be considered.
- Stag Brewery: disagree with move from a primary to second school and sixth form, and cumulative impact of land uses will not contribute to the new village heart for Mortlake and will not protect green open space or reduce level crossing risk.
- Twickenham Green: poor access in surrounding housing areas with many schools and few amenities. Green space/infrastructure should be supported before plans to build.
- Twickenham Town Centre and Green: high sensitivity to change and require naturalising as much as possible because of packed terraced houses.

<ul style="list-style-type: none"> ○ Twickenham, Strawberry Hill & St Margarets: agree with reference to Twickenham Film Studios. Arlington Works should be designated as a 'Locally Significant Industrial Site'. ○ Twickenham, Strawberry Hill & St Margarets: map is inaccurate as it does not differentiate between St Margarets Local Centre and St Margarets Residential. The Local Centre and its immediate surroundings are mixed use in nature and should recognise have the potential to further develop a mixed use nature. Arlington Works could support a mixed use (commercial and residential) regeneration scheme on a key site within the area, however it has been discounted, and do not understand or agree with the rationale. ○ Kew World Heritage Site: would like a strategy for how to ensure the WHS will be protected and enhanced, particularly in light of construction in Hounslow that would impact negatively on its outstanding universal value. ○ Kew Retail Park: would like to see protection against inappropriate height (i.e. 7 storeys or more) and density of redevelopment, given adjacent Kew Riverside are, with one exception, five storeys or less. ● <i>Note detailed comments against each Place-based strategy and Site Allocation are also set out in Table 6 to Q9/10/11 on response form.</i> 	
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7. Summaries of responses received in relation to the Local Plan policies and the Council's response

(Taken from the detailed comments in Table 6 to Q9/10/11 on response form, along with the engagement events report)

Summary of responses	Summary of Council's response
General	
<ul style="list-style-type: none"> ● The Royal Parks acknowledge the inclusion of reference to the importance of Richmond Park and Bushy Park, which aligns with the Royal Parks' own objectives, but would like the Plan to go further by including a stand-alone Royal Parks policy. The importance of the Parks would justify such an inclusion. The Royal Parks would like to work with the Council to capture the value of development around the Parks, and for support in protecting, maintaining and enhancing these sites of key green infrastructure. Both dense development on our Park boundaries and taller developments that impact on the sightline are 	<ul style="list-style-type: none"> ● The name and order of the Plan is considered logical; it is inevitable that some parts are at the end, but a user can navigate their way around the document. ● A number of comments were for information or setting the context of organisations who have responded or for the Duty to Cooperate, which do not require any amends to the Plan. ● A number of comments relate to broader issues which have been covered in other parts of the Plan, or in responses to other comments, or matters beyond

potentially detrimental to these listed landscapes and intrusive to visitors. Suggest a policy could be similar to Policy 32 (Royal Botanic Gardens, Kew WHS) and could refer to the Royal Parks Management Plan, and refer to /cross reference with other key relevant policies, to give the Parks the protection and support which they require. Development in the borough, particularly new residential development, benefits significantly from what the Royal Parks provide but also increases pressure upon them, through increase and intensification of visitor numbers, and the Royal Parks would like to work with the Council to capture the value of relevant development to support the Royal Parks in their work to protect, maintain and enhance the Parks, potentially through S106/CIL contributions.

- Historic England is keen to ensure that the protection of the historic environment is taken fully into account at all stages and levels of the planning process. In summary the Plan represents the historic environment well and considers it consistently and appropriately throughout. Main concerns relate to the detail associated with site allocations, and some areas where the Plan can be improved to ensure the historic environment is conserved and managed sustainably. Would be helpful to have clarification on site allocations and quantum of development, densities etc. as important sites with heritage sensitivities are carefully considered. In general the Urban Design Study findings could be better transposed into policy objectives, particularly within the site allocation policies, where specific findings have already been drawn in the evidence; the future development of guidance leaves a gap and risks. The Plan provides a strong basis for conservation and enhancement of the historic environment, and welcome attention paid to climate change, focus on a designed approach to site capacity, as well as standalone policies on non-designated assets, views, shopfronts, and regular reference to the Urban Design Study.
- A comment the Plan launches almost immediately into the spatial strategy and the nine areas and then the borough-wide policies, whereas the current Local Plan sets the borough-wide policies first leading to the spatial strategy at the end, and wonder why there has been this change. The start of the 'batting order' with climate change, follows with housing, town centres etc. is sensible but fail to understand why concludes with the design process, tall buildings,

the remit of the Local Plan. Some points are covered by the updated Infrastructure Delivery Plan.

- It is considered that the place-based strategies and Site Allocations set out an appropriate level of detail to guide future development, without being overly prescriptive, and signpost where further work such as a masterplan or site development brief may be developed.

local environmental impacts and basements that seem to have been tagged on like after-thoughts, whereas they belong to the section on local character and design quality as in the current Plan. The plans in the spatial strategy sections need to be clearer and the ratings polygon diagrams are illegible and the data would be better presented as tables. The Summary supporting document has been useful.

- Spelthorne Borough Council note there are no Site Allocations in close proximity to the boundary of the two authorities, and look forward to continuing engagement as both Local Plans are taken forward.
- TfL Location Enquiries have no comments and note the London Underground Infrastructure Protection need to be consulted as statutory consultees on any planning application within London Underground zones of interest, and notified of intended works in the highway.
- The EA support the strategic objectives on responding to the climate emergency, biodiversity and green and blue spaces, and reducing the need to travel and improving choices for sustainable travel. Provided detailed comments on key environmental issues and opportunities, Site Allocations, and the Sustainability Appraisal and Sequential Test Report. Encourage full use of the Duty to Cooperate and cross-boundary and collaborative working when addressing climate change, flood risk, waste management, habitat and biodiversity enhancement, watercourse protection and improvement, water and waste resources.
- The Mayor of London comment all Development Plan Documents must be in general conformity with the London Plan, which forms part of the development plan. The comments draw our attention to the Mayor's nine pandemic recovery missions, including high streets for all, enabling resilient communities and digital access for all, which may be useful in helping develop the spatial strategy further. The Plan sets a clear plan for growth and addresses many important policy areas such as responding to climate change and delivering new homes through incremental intensification in well-connected locations. However, the current approach to affordable housing in Policy 11 is likely to be an issue of general conformity.
- Natural England have no comments to make on this consultation.

- A comment looks like a very progressive plan and would have liked more time to read and comment.
- A comment raising mental health and the issue that people are not listening and the problem is poverty.
- Crane Valley Partnership, an unincorporated association of public, private and third sector organisations, whose aims are around managing and improving the design and management of the River Crane and its tributaries. CVP is the formally recognised Catchment Based Approach (CaBa) partnership for the Crane catchment. Members of CVP will submit their responses accordingly if they wish to engage. FORCE is a member of CVP and there is nothing in there response that I would disagree with, and urge the Council to take note of and act on the issues raised to assist in the process of refining the Local Plan in relation to the protection and enhancement of the Borough's river corridors and associated open spaces. Reinforce FORCE's comment the Local Plan should be informed by the [Colne and Crane Valleys Green Infrastructure Strategy \(2019\)](#) which identifies a range of river corridor enhancement and active travel opportunities in the borough. River corridors and the many people who use them for travel and recreation, cross borough boundaries so a coordinated pan-borough approach to green infrastructure provision is required and the Plan should clearly acknowledge this. The CVP has commissioned Sustrans to undertake a footpath and cycleway audit along the river corridors of the Crane Valley and it would be beneficial to feed the future findings into the Local Plan.
- National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system; National Grid Gas plc (NGG) owns and operates the high-pressure gas transmission system. Identified the National Grid assets in the Plan area for electricity transmission – 275Kv underground cable route: Ealing – Laleham 1. An illustrative plan provided and guidance on development close to National Grid assets.
- Marine Management Organisation (MMO) as the marine planning authority, responsible for preparing marine plans for England inshore and offshore waters. At its landward extent the Marine Plan boundaries extend up to the level of the mean high water spring tides mark (which includes the tidal extent of any rivers), there will be an overlap with terrestrial plans which generally extend to

<p>the mean low water springs mark. Marine plans will inform and guide decision makers on development in marine and coastal areas. Planning documents may wish to make reference to the MMO's licensing requirements and any relevant marine plans. The South East Marine Plan is of relevance (adopted 2021). Public authorities taking authorisation or enforcement decisions that affect or might affect the UK marine area must do so in accordance with the South East Marine Plan, or the UK Marine Policy Statement (MPS) unless relevant considerations indicate otherwise. May also wish to refer to the MMO's online guidance, Explore Marine Plans and the Planning Advisory Service soundness self-assessment checklist. A marine licence is required for certain activities carried out within the UK marine area, which can range from mooring private jetties to nuclear power plants and offshore windfarms. Suggest the policies from the South East Inshore Marine Plans that are most relevant, but are provided only as a recommendation - SE-INF-1, SE-INF-2, SE-HER-1, SE-SCP-1, SE-EMP-1, SE-CC-1, SE-CC-2, SE-CC-3, SE-AIR-1, SE-ACC-1, SE-TR-1, SE-BIO-1, SE-BIO-2, and SE-BIO-3.</p> <ul style="list-style-type: none"> • Two comments the title of the Plan should be Richmond-upon-Thames Local Plan and not simple Richmond Local Plan. There is no pagination in the document. The lists of page numbers in the un-headed list of contents and the headed list of policies should be headed as such. 	
Introduction	
<ul style="list-style-type: none"> • Two comments neither section 2 nor section 15 refer to a Policies Map. Referring to 'Policies Map for the Local Plan Review, 2015-2018' which states the Policies Map will be updated in 2020 to reflect the adopted Plan. However, to date this has not been done. There is no published Policies Map beyond that published in 2015. • A comment delivery requires interventionist action by the Council which will not happen. Experience has shown that the ideological reliance, shared by Conservative and Liberal Democratic politicians, on the free market's ability to provide will fail again. Find a complacency in the relative prosperity of the borough pervades the preamble. A fairer share of income and wealth requires the 'no more business as usual' change to a national Labour Government, but the Richmond Labour Party suggest local Government can play its part. 	<ul style="list-style-type: none"> • Add references in the section on strategic context and trends to health inequalities and residents on lower incomes, and paid and unpaid carers. • Further work undertaken to assess trip generation arising from the potential Site Allocations in the Plan, using TfL models which confirmed that the changes in traffic on local roads are significantly less than the 1,000 AADT screening criteria. Therefore, in the updated Habitats Regulation Assessment the air quality impacts have now been screened out , with no further / appropriate assessment required. • The Habitats Regulation Assessment accompanying the Regulation 19 Plan has also been updated to reflect the qualifying feature of the Richmond Park SAC and how the impacts with regard to noise, vibration and light pollution, air pollution, and recreation have been assessed.

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| <ul style="list-style-type: none"> • Two comments much in the Local Plan derives from questionable analysis and recommendations in the Arup’s Urban Design Study, and in more limited part the MOL Annex Report. These need to be firmly challenged. • Historic England comment on the SA Scoping Report, under the SEA Directive there is a requirement to assess the likely significant effects which the Policies and proposals of a Plan might have upon “cultural heritage including architectural and archaeological heritage”. Suggest a number of plans, policies and programmes that should be included. The historic environment should be a factor when considering a method for the generation of alternative proposals – more than just measuring the proximity of a potential allocation to heritage assets, and not just based on visual impacts, as assessment requires a careful judgement based on site visits and available evidence. • The Ham & Petersham Neighbourhood Forum comment on the Sustainability Appraisal – include reference to construction waste (63% of all landfill) and reducing embodied energy, reference circular economy; 82% of buildings built today will be here in 2050, need to meet net zero now to avoid need for retro fit prior to 2050, include reference to reducing greenhouse gas emissions in retro-fits and refurbishments. • Natural England comment on the Sustainability Appraisal and Habitats Regulation Assessment (after their attention was drawn to, in relation to Duty to Cooperate). Broadly in agreement with the HRA conclusions. Support the strengthening of Policy 37 to encourage visitors towards greenspaces outside of those which are Habitat Sites, and recognise the need for further traffic modelling to be able to inform the impacts of the plan in terms of air quality. Would be happy to be reconsulted on the HRA once this modelling has been completed to assess whether we agree with the conclusions, and whether adverse air quality impacts on a Habitat Site can be ruled out or whether there is a need for mitigation. • The Royal Parks comment on the Habitats Regulation Assessment in terms of Richmond Park SAC. On noise, vibration and light pollution, there is no consideration of the potential impact on invertebrates such as stag beetle, which may alter their behaviour or be more vulnerable to predation as a result of artificial lighting. On air pollution, there is no consideration of through traffic | <ul style="list-style-type: none"> • The Sustainability Appraisal accompanying the Regulation 19 Plan has been updated to reference the natural environment features, along with the updated Flood Risk and Development Sequential Test. • A number of comments relate to broader issues which have been covered in other parts of the Plan, or in responses to other comments, or matters beyond the remit of the Local Plan. It is considered appropriate that the short introductory sections of the Plan do not need to exhaustively cover all issues or reference other strategies. • The reference to the adopted Plan and the existing Policies Map is considered adequate, as an updated Policies Map has since been published. • A policy on Heathrow is not considered appropriate because the airport does not lie within the borough boundary. |
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and the potential for associated air pollution to impact stag beetles, through impacts on trees or soil chemistry; nor is there consideration of the impact which local developments or transport policies may have on levels of traffic through the park. On recreation, impacts are discounted solely on the basis of site management, however as per the discussion for Wimbledon Common which is screened in for further assessment partly on the basis of its draw to visitors), Richmond Park is subject to extremely high visitor numbers and would likely be impacted by increased development to a greater degree given location and accessibility. Visitor pressure is at such a high level that even with extensive resources allocated to tree management, the tree population suffer from compaction and erosion, vandalism and fire, whilst deadwood habitats are subject to significant disturbance by visitors. It is therefore not appropriate to screen the site out from further assessment.

- The EA welcome the Sequential Test Report to support the Site Allocations, and look forward to working with us/reviewing the Level 2 SFRA which will also support the Site Allocations. Refer to Section 8.2 of the Level 1 SFRA.
- The EA comment on the Sustainability Appraisal and Sequential Test Report. Note the SA assessments of the Plan objectives show they have a largely positive effect when compared to the SA Framework, and no noteworthy policy gaps were identified, and no significant negative effects established that required mitigation. There are, however, instances where there are uncertainties or potential tensions amongst objectives. One of the key areas where this arose is the impacts on heritage and the natural environment. It states due to the large areas of protected open land and historic settlements it may limit development opportunities; other natural environmental features such as river corridors and areas of high flood risk may also limit where sustainable development can be delivered. The SA objectives are appropriately selected and represent the key environmental issues and opportunities; however wish to comment on specific SA objectives and policies to highlight where further opportunities are missed or where the significance/magnitude of the effects have not been accurately predicted. SA objective on climate change: disagree with the conclusion that delivering new homes/affordable borough for all would have a neutral/uncertain effect - the draft Site Allocations has a

number of potential sites within Flood Zone 2 or 3, and new development in town and local centres may not be required to apply the Sequential Test, potentially delivering a significant number of new homes in areas of flood risk. Refer to the current SFRA to identifying known effect of the policies – developments are required to pass the Exception Test in line with the national PPG, for example unless a change of use application. It would appear certain types of development would not be required to pass the Exception Test and thus this local Sequential Test would be contrary to the NPPF. Seek clarification that the proposed sites that have been deemed to not require the Exception Test are exempt in accordance with the NPPG. In addition, policy framework around town/local centres deemed not to be applicable to this SA objective, but would recommend it is tested given the potential flood risk in tow and local centres. Agree with the conclusion biodiversity/blue and green spaces will have a very positive effect. On the Sequential Test Report, recommended paragraph 1.1.1 refers to the risk of fluvial flooding from other tributaries of the River Thames as well. Support paragraph 4.2.1 regarding islands and flood risk (*see other comments against Policy 8*) and should refine wording in the Sequential Test Report as well. SA objective on reduce pollutions/minimise impacts of development: welcome inclusion of this objective and agree will have a very positive effect on the borough's biodiversity and green and blue spaces. Agree with positive effective from the climate emergency policy framework. Welcome policies 3, 7 and 9 which address potential pollution and other negative environment impacts. Agree with conclusion; however feel there is opportunity for the policy framework to provide a much greater positive effect. SA evidence base: welcome draft revised SA Scoping which includes the strategies and plans we highlighted in our last consultation responses; the SEA/SA section requires updating and recommend the following plans and strategies are added to the SEA/SA process and demonstrate how they have been considered to inform the development of the new Local Plan – EA2025 Action Plan, Natural Flood and Coastal Erosion Risk Management Strategy for England (2020), The Water Environment (Water Framework Directive) (England and Wales) Regulations 2017, Resources and waste strategy for England (December 2018), Serious and

organised crime: 2018 review, and Water Drainage and Wastewater Management Plans (DWMPs).

- The CCG note a HIA has been prepared. The draft Plan responds to the key challenges and trends, including the longer-term impact of the Covid-19 pandemic, the climate emergency and population change, that will have an impact on healthcare services and wider health and wellbeing.
- The CCG note paragraph 2.24 refers to the borough as prosperous, safe and healthy, however there is a difference in life expectancy; health inequalities have been exacerbated during the Covid-19 pandemic. In comparison to other London boroughs, Richmond is relatively less deprived but there are pockets of deprivation.
- Richmond CVS comment that at paragraph 2.26 in addition to an ageing population it is important to highlight high numbers of unpaid carers across the age ranges. Set out under the Care Act the local authority must ensure residents have services/support, and that the pandemic has further highlighted support needs the local authority must consider the needs in relation to access to employment, education, and access to local services.
- The CCG support the reference at paragraph 2.26 to ensure health and care services respond to a changing and ageing population.
- Richmond CVS comment paragraph 2.27 refers to high employment rates but these divert attention from the employment challenges and skills gaps for a number of targeted groups and risk increasing inequalities for these groups. Challenges for those who lack digital skills, with low educational attainment, recent graduates, people aged 50+ seeking work, professions adversely impacted by the pandemic, young people claiming universal credit/Job Seekers Allowance and with SEND. Government initiatives are short term funding. The employment skills gap and priority groups in Richmond need to be recognised in the Plan, and where possible expectations made within the planning process that will generate opportunities for skills-based learning and employment for targeted groups.
- A comment ask we also declare a nature emergency – the ecological crisis is often overlooked and there is a danger of a carbon land grab, which would see biodiversity displaced for offsetting and mitigation.

- The Royal Parks welcome paragraphs 2.33 and 2.39 which recognise that additional residential development and population growth will likely bring more access pressure to the borough's parks and open spaces and make trampling and erosion potential issues. However, additional issues of air pollution and light pollution should also be included.
- A comment delighted the Council declared a climate emergency and making this underpinning the draft Plan, however concerned this is not strong enough where the Climate Emergency conflicts with other policies and I think that the priority around climate emergency should be made explicit in the Plan. It is not unusual for policies to conflict and my experience as a Trustee of Richmond Charity Almshouses has shown there is a danger of priority being given to aesthetic and historical considerations in developments in Conservation Areas and of listed buildings. Application to instal photovoltaics on Candler's Amshouses, Amyand Park Road 21/3000/HOT turned down, by reason of its combined siting and design resulting in an incongruous, prominent and cluttered form of development that would impact on the unaltered roofscape and important unified composition of the former almshouses and thus fail to preserve or enhance the setting, character and appearance of the Conservation Area. The decision flies in the face of the declaration of the climate emergency and contributed to higher costs of the residents in social housing.
- The EA suggest the Thames Estuary 2100 Plan should be referred to in the section 'Responding to a changing environment' (Paragraph 2.33 to 2.40). Recommend the council include a summary of the issues and opportunities highlighted on page 82 of the [TE2100 plan](#).
- A comment on paragraph 2.36 commend the borough on the reduction in emissions made so far and look forward to progress. Ask planning embeds a requirement to move to renewables – possibly incentivising heat pumps and solar and eliminating dependence on gas.
- Richmond CVS comment on paragraph 2.36 inevitably those who need to upgrade their energy efficiency most are those who can least afford it. There have been Council run green energy grant and initiatives targeted these households – what is the data telling us and is there learning to take forward.

- A comment on paragraph 2.39 support the protection of biodiversity and the plan to extend green spaces. One of the key aspects is connectivity – one of the core ideas behind Nature-Connected Neighbourhoods – so I welcome moves towards urban greening e.g. urban hedgerows - space at the back of Squires on Wellington Road is filled with bird life. Perhaps businesses offering quality (and biocide-free) space for nature could receive a reduction in business rates.
- A comment on paragraph 2.40 support an increase in active travel and the idea of the 20 minute neighbourhood sounds promising. Would like to see further measures towards significant reduction in car journeys to schools, such as School Streets – perhaps could be extended to all side roads with school entrances residents and access only.
- A comment support paragraph 2.42 and the Corporate Plan objectives.
- A comment support paragraph 2.44 and opposition to expansion of Heathrow airport; such plans have no place in a climate emergency.
- A comment support paragraph 2.44 and Council’s objections to any further expansion of Heathrow. No other major city has a main airport which adversely affects many of its residents because of the flight paths as London and Heathrow. It’s the most significant factor reducing quality of life in the Kew region.
- Two comments propose Heathrow noise be given much more weight in the Local Plan, especially in response to the re-allocation of flight paths from Airspace Modernisation and the introduction of air taxis and drones. The Development Control for Noise Generating and Noise Sensitive Development 2018 is substantially deficient. The airspace is an important "asset" above Richmond (not only for Heathrow traffic but increasingly for air taxis, drones, etc). The ICAO set of rules for noise management is the Balanced Approach and sets the priorities – starting with reduction of noise at source, followed by land use, operations and finally restricting traffic movements. Land use is about not developing housing and vulnerable uses and/or mitigating noise where there is significant noise impact on health and well being from overflight. Other national noise policies could be deployed to deal with Heathrow noise. At the moment the Noise England Statement on Noise 2010 uses a threshold of 51 decibels (Laeq) for daytime; Heathrow aircraft noise levels in Richmond borough are at

least 60 dbA in some places; WHO Guidance threshold levels are 45 dbA day and 40dbA night. Recommend the Council develop a planning approach and policy to deal with housing and other developments exposed to noise from Heathrow aircraft and the emerging air taxis and drones. A number of developments, such as at Manor Road and Stag Brewery would be significantly affected by aircraft noise, especially on arrivals under the Heathrow landing flight paths, and Airspace Modernisation will affect the whole borough potentially and while the 4 year process takes place there will be uncertainty and blight.

Vision and Strategic objectives

- Richmond CVS highlight the value and contribution of the VCS to community development and sustainability, the needs of the sector as employers, service providers and owners/leaseholders of community buildings, and to create opportunities for investment; we are equal partners in future plans for the borough with particular reference to 20 minute neighbourhoods.
- RHP and Hill Residential support the strategic objectives, including for affordable housing and responding to the climate emergency, which redevelopment of Ham Close will support.
- The Mayor of London comment the themes and objectives align well with the London Plan Good Growth policies.
- The EA recommend the vision also refers to ‘reducing flood risk’ when referring to the challenges of climate change and taking action, as large parts of the borough are impacted by flood risk.
- The EA comment on the strategic objectives relating to climate change, that the climate emergency and biodiversity crisis are inextricably linked and must be tackled together. Consideration should be given to using Nature Flood Management (NFM) techniques where possible, allied with protection and enhancement of river and river corridors – re-naturalising the river, encouraging soft engineering approaches to riverbank protecting and an undeveloped buffer zone. This is aligned with requirements under the Water Framework Directive (WFD) that should be mentioned here – local authorities have a statutory duty to deliver WFD objectives and much can be achieved

- Add reference to reducing flood risk in the vision in relation to responding to the climate emergency.
- Add reference in the strategic objectives to flood storage as one of the multi-functional benefits in relation to rivers.
- Add reference in the strategic objectives to climate resilience in relation to high quality development.
- Add reference in the strategic objectives to health and care services in relation to health as a cross cutting priority.
- Clarify the reference to amenity impacts is also those living, working or visiting the surrounding area.
- Remove some references to the pandemic.
- Add references in section 2 to the Joint Health and Wellbeing Strategy and to the section on strategic context and trends to health inequalities.

through the planning system, see the [Catchment Data Explorer](#) for further information on the WFD status of waterbodies in the borough.

- The EA comment on the strategic objectives relating to green and blue spaces, recommend include ‘as flood storage’, to recognise the multi-beneficial outcomes that protecting and naturalising our rivers can achieve.
- The EA comment on the strategic objectives relating to high quality places, recommend include ‘resilient to climate change’, to demonstrate to applicants it is key to consider from the beginning of the design process, such as finished floor levels.
- A comment recognise the need to respond to the climate emergency and the principles supported. Advocate the need to meet high standards for sustainable design, increased urban greening and tackle biodiversity loss – these standards need to align with those in the London Plan, and considered as part of planning balance and applied flexibly where specific site circumstances or competing considerations mean that minor deviations are necessary. Support aspiration to deliver new homes and affordable provision in line with the London Plan. Note the LHNA need for 1,123 homes per annum and the objective could be realised with brownfield and larger sites, such as the former Greggs bakery, being allocated for residential or mixed use development (put forward by London Square as landowner). Support the objectives to increase jobs and achieve business growth, but do not support the blanket approach to protecting the borough’s Key Business Areas and industrial land and business parks. Note the NPPF paragraph 122. The Greggs site has been out of operation and marketed since February 2018 without interest from potential occupiers. Due to specific site constraints relating to highways, access and amenity issues and no planning application for continued employment use has been put forward since the closure of the bakery. There is no reasonable prospect of an application coming forward for a solely employment use and the site should be reallocated to a more deliverable use. Due to the surrounding residential context, the site provides opportunities to contribute to meeting the housing target. A more flexible and site-specific approach would align with the London Plan Policy E7.
- The Royal Parks welcome the prominence of climate change, culture and heritage and biodiversity within the strategic objectives.

<ul style="list-style-type: none"> • Tfl Commercial Development (commenting in capacity as a landowner) support the strategic vision and the objectives to meet housing targets and maximise affordable housing delivery, and to provide a pathway to zero-carbon. Tfl Commercial Development is committed to delivering 50% affordable housing (by habitable room) across its portfolio, and has published its sustainable development framework. • The CCG suggest reference is made to the Joint Health & Wellbeing Strategy and the Richmond Health & Care Plan under a new section perhaps titled 'A healthier borough'. Support the vision and references to social and community infrastructure and safe, healthy, and inclusive communities. Suggest additional wording in the strategic objectives 'to ensure that health and care services and infrastructure are provided to support and growing and changing population'. Suggest additional wording in the strategic objectives to 'to support development that promotes healthy lifestyles and reduces health inequalities'. Suggest additional wording to clarify health and wellbeing impacts of development extend beyond environmental issues and impacts, refer to impact on 'those living or working in the surrounding area'. 	
Spatial Strategy, Place-based Strategies and Site Allocations	
<ul style="list-style-type: none"> • The Mayor of London welcome the overarching aim to direct new higher density development to sites in town centres or places that are well connected by public transport, walking and cycling to jobs, services, infrastructure and amenities, which aligns with London Plan GG2, SD6 and SD7. Support the 20-minute neighbourhood and 'living locally' concept, which aligns with the Healthy Streets Approach and London Plan T2, GG1, and GG2. Policy 2 is welcomed particularly part B for prioritising previously developed land and support for refurbishment over demolition, which aligns with London Plan D3 and circular economy principles. Support reference to the London Plan's Good Growth objectives in paragraph 4.17. • A comment there are many plots of land not included and question why some are included when others are not. For example – Richmond Athletic Club is included but Richmond Cricket Club is not. Should consider building next to the BP garage on the Lower Mortlake Road, North West of Manor Circus roundabout – unused for a decade and now a car wash, needs a vision to get 	<ul style="list-style-type: none"> • New Site Allocations have been added for Hampton Telephone Exchange, Homebase Hanworth and Fulwell Bus Garage. • It is not considered necessary to make Site Allocations to include a broader range of types of infrastructure, as there is emphasis in the Plan on multi-use spaces and the flexibility of Class E, and may be beyond the scope of the Plan. The Infrastructure Delivery Plan identifies future infrastructure and service needs. • It is considered that further to work to inform the London Plan, the Urban Design Study has, alongside other evidence base work, assessed capacity for growth in the borough, with key sites identified as Site Allocations in the Plan. • It is not considered appropriate to designate other sites for Site Allocations, for example for mixed use development, where the site is a safeguarded waste site, where there is a need to protect/reprovide employment use, existing MOL, existing education, sites for station improvements (Arlington Works, LGC, Land

back into use for residential or commercial; and Plot of east land on the Sandycombe Road, was a old second hand car garage and remained derelict for many years.

- *A comment against the place-based strategies the Hanworth Homebase and Molesey Telephone Exchange should be included.*
- A comment there are additional sites. For example the car park at Richmond railway station could be converted/demolished and replaced by commercial property. The whole of Richmond railway station could be configured with development across the top by building upwards.
- CPRE London comment the borough does not appear to have carried out a rigorous study to unearth all the opportunities available to meet unmet need. For example: Mayor of London's Fulwell landholding is next to a railway station and the parts used for a single storey supermarket, DIY store and surface parking should be redeveloped with air-rights housing; Uxbridge Road Sainsbury's (Site Allocation 5 could have air-rights housing above the main store too; Hanworth Homebase on Staines Road could be redeveloped for air-rights housing; there needs to be a detailed assessment of all town centres to establish housing potential and infrastructure needs.
- A comment offering ideas for consideration missing in the space allocation proposal. Plan to allocate space for: NHS surgeries; pre-school Sure Start nurseries; Local Police and CS04 outposts; a Richmond Magistrates Court; two hands-on experience centres for primary and secondary pupils e.g. future skills in robotics, VR, renewable energy, net zero jobs; Green homes adaptation work spaces along the value chain including manufacture; public transport hubs for 10 seat hail and ride Evs in underserved 'long walk' wards; EV street charging points; increasing social housing provision in redevelopment sites beyond current proposals which allocate the incremental homes to expand private buy to let sector market sales.
- Thames Water (as statutory water supply and sewerage undertaker for the borough) use the information in Local Plans to estimate when upgrades to water supply/wastewater infrastructure will be required, and need to be kept informed of numbers and delivery to avoid delays in infrastructure delivery. Where offsite upgrades are required to serve development, they will be

to West of Stain Hill West Reservoir, Hydes Field, Richmond Park Academy, Christ's School, Mortlake Station area).

delivered and funded by Thames Water using infrastructure charges. Site-specific comments are provided from desktop assessments on water supply, sewerage/waste water network and waste water treatment infrastructure, but more detailed modelling may be required to refine requirements. Early engagement between developers with Thames Water would be beneficial. The time to deliver upgrades should not be underestimated, can take 18months – 3 years; in some cases a condition may be appropriate to ensure development doesn't outpace upgrades. Recommend Thames Water advice is attached to planning applications so the Council and public are assured matters are being addressed. If developers do not engage with Thames Water prior to submitting an application, more likely to lead to the recommendation that a Grampian condition is attached. Thames Water are in the process of creating long term drainage and wastewater management plans (DWMP) with objectives that overlap with those for Richmond, such as sustainable drainage and water management. Support for sustainable surface water drainage and addressing sewer flooding risk, to mitigate misconnections into the foul and surface water sewers.

- Thames Water (landowner) comment on Land to West of Stain Hill West Reservoir, Hampton Water Treatment Works, Upper Sunbury Road as disagree with the Green Belt review and consider the site does not perform strongly in Green Belt terms. Unclear which settlement sprawl is referred to. Consider the site should be removed from the Green Belt. Thames Water (landowner) comment on Hydes Field, Land to North of Hampton Water Treatment Works, Upper Sunbury Road as disagree with the Green Belt review and consider the site does not perform strongly in Green Belt terms. Unclear which settlement sprawl is referred to. Consider the site should be removed from the Green Belt. London's water needs are the key drivers for the strategic resource options programme and this site is a large landholding strategically located near key existing sewage treatment sites and reservoirs and therefore critical to support this strategic development; exceptional circumstances exist to release this site from the Green Belt to ensure the delivery of critical infrastructure is made more straightforward within the planning system, and should be allocated as a future infrastructure development site for water and/or wastewater

infrastructure provisions. There may be other landholdings suitable for development and Thames Water would be pleased to discuss the potential opportunity to contribute towards landscape and biodiversity enhancement, supported by allowing some essential infrastructure development.

- A concern the Stag Brewery Site Allocation is taken forward including a new secondary school, disagree with this element of the site allocation. *Suggested sites Richmond Park Academy and Christ's School to expand educational use.*
- A comment the Mortlake Station area is excluded [in the Council's Schedule of Sites not being taken forward] due to fragmented ownership; do not agree with this. The station area is a dangerous and unwelcoming area. Much of the land that holds the key to a comprehensive improvement is owned by Network Rail and is let on short leases.
- LGC Ltd (landowner) disappointed after a long period of Local Plan engagement the wide-ranging benefits of a mixed-use development in this location have not translated into an allocation. The site lends itself well to a mix of employment and residential uses, that retains LGC in the borough, provides new employment space for new, expanding and relocating businesses and delivers much needed homes. Could contribute to affordable housing land supply, activate the street scene, provide new high-quality publicly accessible green spaces, enhance permeability and promote active travel, be outward facing and connect with the local urban design vernacular. A new, fit for purpose building that meets current and future needs is vital as LGC attracts highly skilled employees in the life sciences sector, and can contribute to the local economy. There is a compelling case for Enabling development where LGC can continue to reside and operate its headquarters from the borough for many years to come. A proportion of the site is surplus to LGC requirements, and a sustainable mixed-use allocation would be appropriate, to make efficient use of land, re-providing and enhancing net existing employment floorspace while providing for significant housing deliver including affordable housing.
- Sharpe Refinery Service Ltd comment on Arlington Works (landowner), that the contribution that the site could make to the area has been dismissed and does not accord with the NPPF paragraph 16. There are factual inaccuracies in the Council's Schedule of Sites not being taken forward, as the site is not a

<p>designated Locally Important Land and Business Park in the adopted Local Plan (it includes Twickenham Studios within the list but does not include Arlington Works. The supporting evidence would not meet the tests of soundness; the Schedule of Sites not being taken forward does not provide a relevant or accurate evidence upon which to base a site allocations policy.</p> <ul style="list-style-type: none"> • TfL Commercial Development are supportive of the place-based strategy for Twickenham, Strawberry Hill & St Margarets, and have two significant landholdings in the area. Disappointed the TfL land at Fulwell Bus Garage and Lidl has not been allocated despite TfL promoting this site. Disagree with the reasons in the Council’s Schedule of Sites not being taken forward. The bus garage would be re-provided and there would be potential to incorporate the BTM into a wider scheme, with significant benefits that a redevelopment could bring to the area, particularly in terms of permeability and accessibility, public realm, new homes and jobs. TfL own the freehold of Fulwell Bus Garage and the Lidl site, and look to engage with the bus operator (RATP) and the GLA about the opportunity for a comprehensive development of the wider site, which a Site Allocation would help to facilitate. <i>Support against Site Allocation 15 for including the TfL landholding.</i> 	
<p>Policy 1. Living Locally and the 20-minute neighbourhood (Strategic Policy) (See also Section 5 for the general response form comments on this policy)</p>	
<ul style="list-style-type: none"> • A comment agree with the logic. • Richmond CVS raise the borough’s long history of an active and supportive voluntary and community sector, that promotes health and wellbeing, own or lease community buildings, and is a significant employer. Ability to mobile and adapt to meet needs of the local community highlighted by the pandemic, provide early intervention and network to reach the most vulnerable, acts as buffer for both health, community, and social care services, and other activities, increasingly recognised as social capital with an associated value. Voluntary and community sector organisations provide services and hubs that support many of the intended outcomes of 20-minute neighbourhoods, yet the vision relating to the 20-minute neighbourhood makes no direct reference to the role of the voluntary sector in enabling that vision, nor does the Plan reflect the support and investment that the VCS needs, alongside businesses, to be sustainable and promote growth. Suggest adding a bullet point to Policy 1 that all development 	<ul style="list-style-type: none"> • Consolidate some of the core concepts of the living locally policy under part B to aid clarity. • Add reference in the policy to people who experience reduced mobility to the policy. • Add further reference in the policy to expectations for a mix of uses, across areas and on sites. • Add an information box for the Regulation 19 consultation to clarify the policy is not seeking to restrict movement. • Add reference in the supporting text to how the 800m relates to the borough, but this is not measured as an absolute geography, and there are no fixed zones or boundaries. • Add a paragraph detailing where applicants can demonstrate compliance with Criteria C. • Add a paragraph to the supporting text on mixed uses.

should “demonstrate their understanding and awareness of the VCS provision locally and how investment in existing community building, spaces and infrastructure will support the living locally concept”.

- RFU support the living locally approach, however Policy 1 applies to all development, except householder applications, and needs to clarify exclusions for Twickenham Stadium as an internationally significant sporting and entertainment venue. Suggest part C is redrafted to specifically exclude Twickenham Stadium and its linked uses as a sporting and entertainment venue. Any development on the site would still be required to meet relevant London Plan and Local Plan policies promoting sustainable transport, healthy streets, and measures to improve biodiversity and air quality.
- CPRE London comment the 20-minute neighbourhood concept, as defined, does not incentivise local living / less car-use. Appears to define as 20 minute one way on foot or cycle, when the appropriate definition defines as 10 mins outward and 10 mins back by foot only – should re-define as 10 minute walk to and 10 minute walk from. More is needed to set out services needed and what new hubs need to be set up. More is needed on how to link walking/cycling to the rail / tube network i.e. secure cycle storage by all stations.
- The CCG support the policy which will enable healthier lifestyles. One of the adjustments needed to respond to Covid1-9 and climate change is to enable people to live locally and a renewed focus on high streets and local centres as destinations. Welcome the opportunity to discuss what the concept means for healthcare services and models of care; it is recognised the NHS has a role in supporting the regeneration of town centres, as research outlines opportunities for the NHS to become directly involved with running health services from vacant property, including vaccination programmes, broadening range of services provided within communities and supporting health places.
- A comment looks impressive but in reality needs to include analysis of the facilities provided too. Example of my local area around Kew Gardens station, a thriving local parade but a tourist hot spot heavily weighted towards coffee shops. In determining whether ‘20-minute neighbourhood’ is achieved the range and quality of the facilities needs to be included.

- Add a paragraph to the supporting text on people with reduced mobility.

<ul style="list-style-type: none"> • A general comment relating to cycle infrastructure across all boroughs. Need safe and secure storage to prevent theft of bicycles in all shopping areas, not just shelters, a rack nor CCTV. Could the Council consider subsidised bike lockers or a Council run bike valet/repair service (empty shops in Kingston and Richmond would be suitable). Would be prepared to pay for bike to be safely stored, whilst I shop. Not having secure bike storage is not encouraging me to get out of my car, along with not feeling safe on the road. 	
Policy 2. Spatial Strategy: Managing change in the borough (Strategic Policy) (See also Section 5 for the general response form comments on this policy)	
<ul style="list-style-type: none"> • A comment agree with the logic, but it leads into the spatial strategies for the nine areas and wonder why these should appear upfront and not at the end of the document. • National Grid infrastructure crosses land that is being brought through the planning process, due to the increasing pressure for development. National Grid advocates high standards of design and sustainable development, and understands contemporary planning and urban design agenda require a creative approach to new development around high voltage overhead lines, underground gas transmission pipelines, and other National Grid assets. To ensure Policy 2 is consistent with national policy, require addition of part E “Proposals will take a comprehensive and co-ordinated approach to development including respecting existing site constraints including utilities situated within sites”. • The EA refer to their duty to promote conservation and enhancement of habitats and species dependent on aquatic environments, linked to the quality of the water environment and the requirement of the Water Framework Directive to achieve “good” ecological status in all WFD waterbodies by 2027. Pleased to see it is a strategic aim of Policy 2 to deliver sustainable growth, while tackling the climate emergency and biodiversity crisis. • The CCG note the Plan aims to meet the needs of local communities and businesses through the provision of housing, employment, schools, community services, social infrastructure, leisure and other local services. Suggest reference is made to the Infrastructure Delivery Plan to ensure growth is delivered with sufficient supporting infrastructure. 	<ul style="list-style-type: none"> • Update the supporting text to reflect the new and updated evidence base. • Update the Key Diagram • Delete the Alternative Policy Options to the Spatial Strategy, as that section was included in the Regulation 18 Plan to inform consultees of the issues being considered, and stated it would be removed.

<ul style="list-style-type: none"> • Two comments that responded to the Direction of Travel consultation in 2020, wherein questioned the need and advisability of replacing the Local Plan 2018 so soon. One of the Council’s reasons given was population growth, but the Retail & Leisure Needs Study (2021) estimates the borough population to grow by only 2.8% in 2039, with a decrease in Richmond Town and surrounding area. The absence of population growth feeds through into housing, retail, leisure, employment uses. Believe it is important to emphasise improvement as well as growth. Even without population growth, expected there will be increasing prosperity and disposable income and therefore growth in the uses of Richmond Town. 	
Places	
<ul style="list-style-type: none"> • Habitats & Heritage support the need to provide new open space in all new developments expressed in many of the site allocation proposals. • The CCG note the high-level ‘places’ with key sites as site allocations, many of which have been rolled forward from the adopted Local Plan and Twickenham Area Action Plan; the CCG has responded to individual masterplans and planning applications for some of these key sites. • Richmond CVS comment it is notable the area profiles, beyond reference to Kew Gardens and Hampton Court, do not identify any of the community and voluntary sector infrastructure that contribute to the health, well-being and sense of place of that area, nor is there a mapping of the community assets that provide community centres and spaces. The same is true of demographic and economic profile – most of the information in the area profiles is heavily weighted in perpetuating that Richmond is a leafy green borough with the majority of residents employed in highly skilled professional jobs. We know this is not the case, and the pandemic has created a level of instability in social economic groups not previously seen in services. Pressures on unpaid carers and needs of children with Special Educational Needs, particularly to transition into adulthood including employment and housing, are expressed in the SEND Futures Plan. For there to be a joined-up approach it is essential to have an accurate and balanced profile of each area which maps the community assets, highlights the demographic and particular age profiles that may be relevant, and is clear in its expectations relating to investment and improvement of 	<ul style="list-style-type: none"> • The reformatted Site Allocations include a ‘Context’ section, within which greater detail of the constraints of the site and surrounding area has been provided. • See Policy 44 for amended supporting text on community engagement. • It is not considered necessary to generally add more details to area profiles or community mapping, with references to the community and voluntary sector added in other parts of the Plan and the Infrastructure Delivery Plan setting out the future needs of providers.

existing infrastructure. An example is Barnes – the area profile ignores Castelnau is an area of relative deprivation with extreme affluence neighbouring poor. The Barnes Fund research highlights the challenges residents face and the experience of isolation, limited public transport, no affordable shops, situation with Hammersmith Bridge, lack of local services. They value community provision such as Castelnau Community Centre and the Barnes Community Association. London Sustainable Development Commission Report highlights tangible benefits for local communities of a social value approach, using public bodies' purchasing power and decision making to increase the benefit to the community by requiring actions and activity that will contribute to growth, employment, resilience and environmental sustainability.

- Richmond CVS set out research that a social value approach helps identify what's important to communities and the likely impact of changes made to their neighbourhoods. Asset Based Community Development is an approach to sustainable driven development which would lend itself to development of the 20-minute neighbourhood. The Plan gives little indication how the community voice will be invited, heard and involving in planning and ongoing community development, and there are no suggested measures in the monitoring that will capture social impact of the 20-minute neighbourhoods, the difference it is making in terms of quality of life and the experience of living in Richmond. The Plan emphasis, particularly in relation to green and blue infrastructure, on community education and stewardship and many targets relating to the climate emergency rely on engaging residents. Plan would benefit from a clear set of expectations in relation to the community voice, engaging with and involving the seldom heard, and encouraging the involvement of young people in neighbourhood development.
- Historic England provided comments on a number of sites. All of the allocated sites are developable in principle, it is a matter of to what extent relative to where the sensitivities lie. Important a design-led approach is taken when allocating development capacity to ensure it can be accommodated within a site while avoiding harm to the historic environment in the first instance, or with appropriate mitigation. The allocations could include more details to reflect the findings of the Urban Design Study. Important to ensure all heritage

<p>assets are identified in allocations policies, and better reference should be made to archaeology. These sites will need more intervention and advice from GLAAS, with desk based assessments required to inform site capacity, mitigation and design – 10 St Mary’s University, 18 Twickenham Riverside, 20 Kneller Hall, 22 Ham Close, 22 Cassell Hospital, 27 American University, 34 Stag Brewery.</p>	
<p>Place-based Strategy for Hampton & Hampton Hill</p>	
<ul style="list-style-type: none"> • The Royal Parks comment should include reference to protection of open space, to reflect risk with increased recreational pressure. • A comment the Hanworth Homebase should be added as a potential mixed use residential/commercial intensification site allocation, as there is a desire by the landowner to bring this type of site to residential. The existing out of town retail does not add to the viability of the town centre, and encourages care use. A comment the Molesey Telephone Exchange should be included, as other telephone exchanges are included across the borough. Suggest adding these two sites would add consistency and provide opportunity for affordable housing on brownfield land. • A comment the acute shortage of school places is not being addressed and many families in Hampton cannot get into local schools, and the Council will need to identify a new secondary school site in Hampton and see how existing schools can increase their pupil numbers. A comment Hampton Nurserylands has high levels of social need and the Plan hasn’t acknowledged or put in place a policy to help people improve their quality of life. 	<ul style="list-style-type: none"> • Added reference to the protection of open spaces in the place-based strategy. • Added as new Site Allocations Homebase, Hanworth and Molesey Telephone Exchange as they are a similar type of site to other allocations. • It is not considered necessary to refer to a shortage of school places in Hampton, as the School Place Planning Strategy is kept under review and evidences there is sufficiency of places overall. It is considered other parts of the plan, particularly around ‘Living Locally’ support improvement of Hampton Nurserylands.
<p>Site Allocation 1: Hampton Square, Hampton</p>	
<ul style="list-style-type: none"> • TfL comment should state car parking should be minimised as part of any redevelopment, consistent with objectives to reduce car dominance and should not exceed maximum parking standards. • A comment disagreeing with the proposal, as it contains an implicit threat to build on part of the site that is designated as Other Open Land of Townscape Importance because it would be cheaper. Notes the OOLTI review assesses the site as meeting the criteria strongly, and nibbling away at it would matter to children and users who appreciate the green lung. Suggest the proposal should 	<ul style="list-style-type: none"> • Removal of reference to Area of Mixed Use as this designation is not being taken forward in the new Plan. • Added clarification that car-parking provision should be to London Plan standards. • Proposed change to boundary to remove the small portion of OOLTI/POS from the Site Allocation.

<p>exclude the OOLTI from potential redevelopment or redraw the boundary so there is no overlap.</p>	
<p>Site Allocation 2: Platts Eyot, Hampton</p>	
<ul style="list-style-type: none"> • Port Hampton Estates (landowner) consider a positive framework for regeneration on the island. Suggest a requirement to reinstate the listed buildings as they were before the fire should be reworded to refer to reinstate through an appropriate scheme of restoration. • EA comment that the sequential test report considers the allocation will be less vulnerable and if there is potential 'more vulnerable' residential use the sequential testing should be re-assessed. Suggest make it clear in the policy any development must comply with flood risk policy as new development should be outside of the functional floodplain. Suggest clarification that any access and egress works must not impact on flood defence maintenance access or a loss of riparian habitat or flood storage. • Elmbridge Council comment, as the site is along our shared boundary, caution to any intensification which could increase flood risk and impact flow routes of the functional floodplain. 	<ul style="list-style-type: none"> • Reference to new Plays Eyot Pedestrian Bridge added. • Reference to restoration of listed buildings to pre-fire standard removed and reference only to their appropriate restoration. • The new Site Allocations format identifies the flooding constraints for each site. Flood risk / SuDS matters are covered in Policy LP 8 of this Plan and it is therefore not considered necessary to set out the requirements of developers for this in the Site Allocations. • An update to the Sequential Test report for the site includes a 'more vulnerable' residential use.
<p>Site Allocation 3: Hampton Traffic Unit, 60-68 Station Road, Hampton</p>	
<ul style="list-style-type: none"> • Thames Water do not identify any infrastructure concerns but set out advice for a developer to consider the water supply / wastewater / surface water drainage, noting the site is within 15 metres of a strategic sewer. • Habitats & Heritage support a link to the Beveree site and would seek a contribution towards managing/improving biodiversity of the site which is a mix of the football pitch, parking and the designated nature conservation site which community groups have worked on in the past. 	<ul style="list-style-type: none"> • Removal of reference to Area of Mixed Use as this designation is not being taken forward in the new Plan. • The new Site Allocations format identifies the flooding constraints for each site. Flood risk / SuDS matters are covered in Policy LP 8 of this Plan and it is therefore not considered necessary to set out the requirements of developers for this in the Site Allocations. • No changes to reference to Beveree site as Policy 36 'Other Open Land of Townscape Importance' is clear that improvement and enhancement of OOLTI is encouraged, thus a financial contribution could be sought as part of this policy, if appropriate.
<p>Site Allocation 4: Hampton Delivery Office, Rosehill, Hampton</p>	
<ul style="list-style-type: none"> • No comments received on this Site Allocation. 	<ul style="list-style-type: none"> • Development on the site has now been completed, so the Site Allocation has been removed from the Plan.
<p>Site Allocation 5: Carpark for Sainsburys, Uxbridge Road, Hampton</p>	

<ul style="list-style-type: none"> • Sainsbury's (landowner) comment that while supporting the removal from MOL and re-provision of petrol station and parking for the foodstore, allocation for 100% affordable housing is not justified. The removal is the fact that it is a foodstore car park and petrol filling station, a historical quirk that needs to be justified, unrelated to tenure. Also raise concern 20% biodiversity net gain requirement will be unfeasible. • TfL comment that the allocation should make it clear that: the bus stop alongside the existing store must be retained; re-provision of parking should be minimised as part of any redevelopment; and refer to rapid charging hubs and/or hydrogen refuelling facilities in re-provided petrol stations. • A comment that re-provision will only work if a very large car park is retained for customers visiting the store, and parking facilities for the new development. • Some comments relate to supporting enhancements on the Longford River. Habitats & Heritage are concerned at the MOL release until a plan is agreed for the restoration of the important green corridor and so that relevant parts should be kept as MOL. • The CCG comment the site may generate the need for investment in healthcare infrastructure in the area. 	<ul style="list-style-type: none"> • Added reference to improved permeability for pedestrians and active travel as a benefit/expectation of new on-site Public Open Space provision requirement. • Added clarification that car-parking provision should be to London Plan standards, for consistency in wording across the Site Allocations. Added that car-parking would need to be provided as part of the new development, as well as re-provision for the Sainsbury's. Need to retain the bus stop has been added (and mentioned in the site description). Added need to incorporate sustainable refuelling options in the petrol station. • No changes to 100% affordable housing requirement as this is considered to be justified on grounds of providing an 'exceptional circumstance' for the release of the MOL. • No changes to 20% BNG requirement. The site is in an ecologically sensitive location and it is not considered unfeasible that the target could not be achieved on site. Any inability to do so would need to be fully demonstrated and justified by the applicant at planning application stage, though the Council is doubtful that this would be the case. • No changes to reference to release of MOL. The Site Allocation makes clear that ecological enhancements to the section along Longford River would be required. • No recommendation to include mention of need for healthcare infrastructure, which is covered elsewhere in the Plan.
Place-based Strategy for Teddington & Hampton Wick	
<ul style="list-style-type: none"> • A comment that the draft Plan sets out the appropriate strategy to maintain and improve the attractiveness of Teddington, but concern regarding the mid-rise zone in Teddington. The examples in Teddington are out of keeping and a mid-rise zone will encourage developers they can build 5/6 storey buildings and should be deleted. Suggest 5/6 storey buildings may be considered in appropriate settings, but against the assumption that buildings in a particular zone should be 5/6 storeys high. Consider the industrial area near Teddington Station should remain as employment. Another respondent also commented there should be no more hideous mid-rise development. • The Royal Parks comment future development plans should include reference to protection of open space, to reflect risk with increased recreational pressure. 	<ul style="list-style-type: none"> • Minor change recommended to include the protection of open spaces, as well as their improvement. • No changes recommended to the place-based approach for the borough as a strategy. • No changes recommended to the approach to identify areas which could be appropriate for mid-rise buildings, as per the findings of the evidence base of the characterisation study of the Urban Design Study. The identified mid-rise building zone for Teddington railway side covers a small part of the town centre, limited to just the area along the railway line north of Teddington Station, across the junction of Station Road/High Street. It is therefore

<ul style="list-style-type: none"> • A comment that affordable housing should not be subsidised and those unable to afford properties should go somewhere where they can afford. • A comment there is no mention of Ellera Hall, which has faced local opposition to the proposed redevelopment. 	<p>considered appropriate. However, the supporting text for the Mid-Rise Zone in the Urban Design Study has been expanded to further justify the designation.</p>
Site Allocation 6: Telephone Exchange, Teddington	
<ul style="list-style-type: none"> • Thames Water do not identify any infrastructure concerns but set out advice for a developer to consider the water supply / wastewater / surface water drainage. • Habitats & Heritage comment the green space to the front is a wildflower area and should be retained/improved as a local green hub. 	<ul style="list-style-type: none"> • Amendment to reference to convenience goods floorspace and additional food/beverage floorspace requirements to reflect updated Retail and Leisure Needs Study. • Amendment to text to refer to offices as an example of an appropriate floorspace, and addition of ‘or other commercial uses’ to create greater flexibility, with offices as one such option, in light of reduction in predicted office space needs in the updated Employment Land and Premises Needs Study evidence base. • The new site allocations format identifies the flooding constraints for each site. Flood risk / SuDS matters are covered in Policy LP 8 of this Plan and it is therefore not considered necessary to set out the requirements of developers for this in the Site Allocations. • The new site allocations format identifies areas of open space / access to nature and this piece of land has been included in the description. The developer requirements/asks section already mentions retention of this open space, but this has been amended to make clear that it is green nature of the open space which requires retention, for biodiversity and visual relief.
Site Allocation 7: Teddington Delivery Office, Teddington	
<ul style="list-style-type: none"> • Thames Water do not identify any infrastructure concerns but set out advice for a developer to consider the water supply / wastewater / surface water drainage, noting the site is within 15 metres of underground waste water assets. 	<ul style="list-style-type: none"> • Amendment to text to refer to offices as an example of an appropriate floorspace, and addition of ‘or other commercial uses’ to create greater flexibility, with offices as one such option, in light of reduction in predicted office space needs in the updated Employment Land and Premises Needs Study evidence base. • Minor amendment to the convenience good/food and beverages floorspace requirement reference to reflect the updated Retail and Leisure Needs Study. • The new site allocations format identifies the flooding constraints for each site. Flood risk / SuDS matters are covered in Policy LP 8 of this Plan and it is

	therefore not considered necessary to set out the requirements of developers for this in the Site Allocations.
Site Allocation 8: Strathmore Centre, Strathmore Road, Teddington	
• No comments received on this Site Allocation.	• Noted
Site Allocation 9: Teddington Police Station, Park Road, Teddington	
<ul style="list-style-type: none"> • The partners of Park Road Surgery comment on their urgent need to move premises, as they are accommodating 10,000 more patients than the building should and with poor access, recognised as the top priority in the CCG Estates Strategy. The Surgery ask for the Site Allocation to be strengthened specify the need for a co-located health and social care facility, and ensure any planning consent should specify the need is met, with any sale/lease of residential units conditional on occupational of the GP space. • A significant number of comments from patients and individuals were received, supporting the Surgery and asking the Local Plan to require the Park Road Surgery to be relocated there as part of any redevelopment, and that any planning consent should specify the need is met, with any sale/lease of residential units conditional on occupational of the GP space. Comments set out in detail the issues with the existing Surgery site, and the benefits of a move to new premises. • A comment that there should be a police office presence in Teddington. • The Metropolitan Police Service comment that the Site Allocation is unreasonable and inflexible, with inadequate justification. Concern that the approach is contrary to Policy 49 as policies allow flexibility to take into account the demand that exists for social and community infrastructure at the time of a planning application. Inconsistent with Policy 49 as where 100% affordable housing is proposed, other social and community use re-provision will not be required. Seek amendments to be consistent with Policy 49. • A comment supporting retention of the OOLTI on the site. 	<ul style="list-style-type: none"> • No changes proposed to the future acceptable land uses section of the Site Allocation as this already makes clear that redevelopment of the site will only be acceptable if a community/social infrastructure use is reprovided on the site, such as for a medical/health use. Policy 49 ‘Social and Community Infrastructure’ in this Plan already encourages the co-location of uses. • Whilst a police station falls within a Sui Generis Use Class, it is still considered to be a community/social infrastructure, thus it is considered to be reasonable and justifiable to include the re-provision of a community/social use on site. Should there be no demand for a social/community use / end-user, there is sufficient flexibility within Policy 49 to allow for alternative uses, thus it is not considered that the Site Allocation requirements prevent the site from coming forward for redevelopment. The Site Allocation makes clear that, as per Policy 49, where 100% affordable housing is proposed, there is not a requirement to provide the social/community use. • It would not be appropriate for planning to control the sale/lease of residential units on condition of the occupation of the GP space. Whilst the social/community infrastructure use can be protected via planning, planning cannot control which end-user ultimately occupies the space. Secondly, it is not considered that controlling the sale/lease of the residential units would meet the NPPF tests for a planning obligation. The retention of the community/social use via planning policy is considered to be appropriate. Finally, limiting the sale/lease of properties and the timing of their coming forward could have viability implications for the deliverability of the scheme overall. • No changes recommended regarding the OOLTI, as the protection and enhancement of this space is already a requirement of the Site Allocation.
Place-based Strategy for Twickenham, Strawberry Hill & St Margarets	

<ul style="list-style-type: none"> • A comment on behalf of Strawberry Hill Residents Association that no design guidance section has been provided for C4 Strawberry Hill Residential in the Overall Strategy. • A comment from Strawberry Hill Residents Association that it is unclear why Wellesley Road identified as an example for reanimating local commercial area given it is residential. • A comment that Twickenham, Strawberry Hill & St Margarets is too large to be a 20-minute neighbourhood. • A comment that the strategy is generic and not as thorough as the Twickenham Area Action Plan (TAAP); indicates that Council has not engaged as much with residents. • A comment that the viability of Eel Pie Island boatyards requires car parking on the embankment/Twickenham riverside. • Support from Twickenham Film Studios of the recognition of the Studios as an important employment location. • Support from Twickenham Film Studios for the policy criteria against which future development will be assessed. • Support from Friends of the River Crane Environment (FORCE) for protection and enhancement of riverways. • Support from FORCE for provision of public toilets in public realm. Would welcome public toilets in Shot Tower area. • Suggestion from FORCE that Council Depot may be too large for future waste site operations and that the site is opened up to the river to relieve pressures from nearby future residential development. • Comment on behalf of South West London Clinical Commissioning Group (CCG) that it is noted a number of sites area identified for residential use and the cumulative impact this could have on health infrastructure. • Comment from WSP on behalf of Sharpe Refinery Service Limited (SRSL) that the place-making strategy should be numbered/titled more clearly. • Comment on behalf of SRSL that description and mapping for St Margarets should be clearer. 	<ul style="list-style-type: none"> • Reference added which reflects the Urban Design Study design guidance. • Additional text to reference the possibility of a cycle bridge from Ham to Radnor Gardens. • Reference to public realm improvements retained though amended to refer to Wellesley Parade for clarity. • Two new Site Allocations added, both of which are identified as having potential to deliver residential (subject to other policy requirements in the Site Allocations and Plan overall). It is not recommended that any further amendments are made as part of the need to meet housing targets. • No amendments to the Twickenham, Strawberry Hill & St Margarets place-making boundary recommended, which are considered to be rational and appropriate. • No amendments to overall presentation and format of the policy in the draft Local Plan recommended, notwithstanding the reformatting of all Site Allocations and the removal of the spider diagrams. • No amendments recommended to car parking on the Embankment, which is considered to strike right balance between improving the environment of the Embankment through a reduction in car parking, and retaining some parking for the benefit of Eel Pie Island. • The Council Depot is a safeguarded waste site. • No amendments recommended to the reference to the intensification of existing employment space in Twickenham town centre. • A separate Housing Delivery Paper outlines details on past and future housing supply, therefore it is not considered necessary that Site Allocations include an indicative housing quantum for how many units could/should be delivered on site. • Greggs bakery site not recommended for inclusion as a Site Allocation for mixed-use residential development, given the need to protect/reprovide employment use on site.
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<ul style="list-style-type: none"> • Comment on behalf of SRS� that sites capable of delivering residential mixed-use schemes should be identified. • Comment on behalf of SRS� that Arlington Works should be included as a Site Allocation for mixed-use residential/commercial development. • Comment from DP9 on behalf of London Square Developments (LSD) that the wider aims of providing officer floorspace and flexible workspaces are generally supported though object to blanket approach to intensification of existing employment sites which does not consider site-specific circumstances. • Comment on behalf of LDS that policy is poorly evidenced and the Council’s indicative housing targets for the area are undeliverable. • Comment on behalf of LDS that need for housing should be made more explicit in the policy and that the Site Allocations should state indicative housing capacity figures. • Comment on behalf of LDS that Greggs bakery site should be included as a Site Allocation for residential development 	
Site Allocation 10: St Mary’s University, Strawberry Hill	
<ul style="list-style-type: none"> • A comment that the University have confirmed their former plans have been abandoned and its vision now is to develop and upgrade its existing residential footprint to improve quality and capacity, to make better use of their academic buildings and improve the setting of the University. • A comment very limited expansion only acceptable. • St Mary’s University (landowner) welcome inclusion of their main campus. Propose changes to the red line boundary – rear of 11 Waldegrave Road is owned by the University and should be included. Note the allocation includes their sports ground at Teddington Lock and believe this should have its own Site Allocation. Considering options for improving this site, at present does not provide an acceptable level of student and community experience outlining problems which can only be addressed through enhancement of existing buildings and/or development of new additional buildings and provision of artificial sports surfaces to serve the University and local community. • Historic England raise the Strawberry Hill site is highly sensitive and past masterplans have raised concern regarding the potential threat to the site’s heritage significance, notably the setting of the registered landscape. Future 	<ul style="list-style-type: none"> • A minor amendment to wording to ensure visual impacts on Ham House would be a consideration, via replacement of ‘having regard to’ sensitive heritage assets to their protection and where possible enhancement. • A minor amendment to wording to add to the need to ‘improve and enhance the Metropolitan Open Land (MOL) that its openness and character must be protected and where possible enhanced. • No amendments recommended to the proposed land uses or overall masterplan for St Marys Site Allocation. • It is not considered necessary for the sports grounds to have a separate allocation. • No amendment to the boundary, as the University has confirmed that the ownership boundary matches the Site Allocation. • No amendments recommended to the reference to upgrading and/or extending the residential accommodation on site.

<p>master planning should explore how lesser quality buildings and spaces can be redeveloped, bearing in mind the benefits of reusing buildings to maximise embodied carbon. Amend the allocation to refer to advice to consider reuse as an option before new development, along with research of the historic landscape and opportunities for enhancement. Specify that parts of the site particularly benefit from its existing open quality and the need to consider this early on in the design process. Require an archaeological assessment and GLAAS should be consulted at an early stage.</p> <ul style="list-style-type: none"> • A comment agree with strategy. • The National Trust comment the site could be developed without impacting adversely on Ham House provided the height is restricted to a maximum height to that of existing buildings on site, limited to between 2-3 stories. This will have the benefit of conserving this highly sensitive area. • CPRE London comment while the Plan protects MOL, proposals for the site are very likely to involve inappropriate development, and means the Plan is unsound and contradicting. • A comment this could lead to the further loss of MOL. A master plan should be developed as part of the Plan and some of the existing building footprints returned to the MOL to compensate for previous losses. • Richmond Bat Species Action Plan Steering Group comment there should be a statement about the potential biodiversity value of the site and connectivity via the Thames to the wildlife habitat of Ham Lands/Young Mariners Club (<i>see comment on Policy 34</i>). 	<ul style="list-style-type: none"> • No amendments recommended to reference biodiversity, as enhancement requirements would already be captured as part of assessment against draft Local Plan Policy 34. Green and Blue Infrastructure.
Site Allocation 11: Richmond upon Thames College, Twickenham	
<ul style="list-style-type: none"> • A comment the college building could be repurposed rather than demolished, for school/college for drama, dance, film making, gardening and landscape skills. • Richmond upon Thames College (landowner) set out the allocation does not reflect the up-to-date position that the Technical Hub will not come forward in the form envisaged and should be removed from the allocation; as a result the College are proposing to retain the existing Sports Hall while refurbishing and extending it. 	<ul style="list-style-type: none"> • Addition of reference to need to improve coherence and sense of place. • Rewording of Site Allocation to align with the recent planning applications approved at Planning Committee, and to remove reference to the Tech Hub, which is no longer coming forward. • No amendments to the wording with reference to ecology are recommended, noting that the Site Allocation already requires protection and where possible enhancement of the River Crane corridor. • No amendments recommending regarding flood risk, noting that the new format identifies the flood constraints for the site.

<ul style="list-style-type: none"> • A comment the text needs to be updated to reflect the development that has taken place and the remaining land is vacant college awaiting demolition and site now in the hands of a housing association. • FORCE have been engaged with the project and raised concern on the minimal enhancement so far delivered for the River Crane corridor, and risk of over-use and degradation of Craneford West Field and Kneller Gardens. Aspirations include measures to integrate Craneford West Field with the Challenge Court Meadow and for improvements to pathways serving the Duke of Northumberland’s River and the Crane. • Thames Water do identify the scale of development in this catchment is likely to require upgrades of the water supply network and recommend early liaison; do not identify any concerns but set out advice for a developer to consider the wastewater / surface water drainage, noting the site is within 15 metres of underground waste water assets. 	
Site Allocation 12: The Stoop (Harlequins Rugby Football Club), Twickenham	
<ul style="list-style-type: none"> • Harlequins Rugby Football Club comment on The Stoop (landowner) support for the inclusion of the site allocation, but objects in relation to aspects of the wording. Object to the proposed building heights and believes potential to accommodate 7 stories or more and should be an opportunity for ‘tall buildings’. Object to the extent of the allocation, as the Club owns additional land to the east which should be included and the allocation make clear there should be no loss in terms of the quantity and quality of open space so there is flexibility to be distributed through the proposed development. Object that the allocation does not include a statement that if the Council’s Depot Site to the south becomes surplus then it would be logical to extend the design brief to include this land. • TfL comment that early engagement should take place with TfL to assess potential impacts on the adjacent TfL road network. • FORCE comment the site has a long frontage on to the Duke of Northumberland River (DNR) and there should not be development to cause shading, light or noise pollution on the DNR corridor; would welcome a commitment by the Club to engage or adopt the stretch of the DNR. Concern the preparedness to consider residential development and would add to risks of imposing more 	<ul style="list-style-type: none"> • Added reference to need to include pedestrian routes where possible, and encourage active travel, for consistency of wording between the two stadium sites. • The new Site Allocations format identifies TfL road networks. No further changes to the wording are considered necessary as requirement for engagement is already referenced. • It is not recommended that the site be included as a Tall Building Zone, noting the low-rise nature of the surrounding area and nearby designated open land. • The inclusion of the designated open land within the Site Allocation boundary is not recommended, which is to be protected. • No amendments to the inclusion of the site as a Mid-Rise Building Zone. The site was found to have the potential to accommodate Mid-rise buildings as part of the modelling undertaken by Arup for the Urban Design Study 2021. • The inclusion of the Council Depot within the Site Allocation boundary is not appropriate, as this is to be retained as a safeguarded waste site. • No amendments recommended regarding the proposed land uses, which are considered to be appropriate for the site and area.

<p>crowding and wear-and-tear on Craneford West Field and Kneller Gardens which should be given equal weight to sporting and associated uses. Any further residential strengthens the case of opening up Challenge Court Meadow to public access and integrating with Craneford West Field.</p> <ul style="list-style-type: none"> • A comment do not agree with proposals re hotel and business uses and further housing, and do not agree the proposal for mid-rise buildings as would cause overdevelopment close to that already underway at Richmond College. 	<ul style="list-style-type: none"> • No amendments to the wording with reference to ecology are recommended, noting that the Site Allocation already requires protection and where possible enhancement of the River Crane corridor.
Site Allocation 13: Twickenham Stadium, Twickenham	
<ul style="list-style-type: none"> • TfL comment that although there is a need to retain sufficient parking should be rephrased to minimise as part of any redevelopment, to reduce car dominance; early engagement should take place with TfL to assess potential impacts on the adjacent TfL road network. • RFU (landowner) support the inclusion of an allocation, although the focus is on sports uses and does not acknowledge the stadium’s role as an entertainment venue, emphasising the importance of revenue generation from non-sporting events. Request specific references to food and beverage and retail that is ancillary and complementary, to allow for additional facilities to cater for visitors and generate local economic benefit. Recognise subject to a management plan, and depending on scale a retail impact assessment, demonstrating does not lead to harmful impacts on the vitality and viability of Twickenham Town Centre. Consider office space could detract from the venue and should be removed. On parking essential existing parking is retained and understand any further development subject to the relevant policies, although highlight the unique operational use of the site. On design objectives, comment on the Urban Design Study and that the stadium merits its own character area; and support acknowledgement of areas more able to accommodate growth and change and would support an approach to stepping down in massing as suggested. • FORCE comment the site has a 700m frontage onto the Duke of Northumberland River (DNR) and there should not be development to cause shading, light or noise pollution on the DNR corridor; the existing plant should be relocated and would welcome a commitment by the RFU to engage or adopt the stretch of the DNR. Concern the preparedness to consider residential 	<ul style="list-style-type: none"> • Addition of ‘and other commercial’ uses to appropriate employment generating uses, in recognition that site is outside of a town centre. • Added clarification that car parking provision should be to London Plan standards, though this is subject to further comment from Transport colleagues. • Added reference to need to improve pedestrian routes where possible and encourage active travel. • The new Site Allocation format identifies TfL road networks. A further minor amendment to further clarify requirement for partnership working. • An amendment to include food and beverage as possible appropriate additional facilities. • A separate bullet point has been included to reference recognition of the important role an entertainment use on site could play in supporting the viability of the sporting stadium. Reference added to the need to protect the local road network and neighbouring amenities. The inclusion of entertainment as a primary function, alongside sports uses, is not considered appropriate. • An additional sentence added to confirm that building heights should step down towards the boundary. • No amendments to need to consider sporting and/or employment uses prior to a residential scheme being considered. The stadium has an important sporting, cultural and employment role in Twickenham, thus these uses are to be retained/considered before a residential use might be deemed appropriate. • It is not recommended that a separate character area for Twickenham Stadium is created. The site already has its own sub area within the Urban Design Study 2021.

<p>development as no green space in the immediate vicinity and would add to risks of imposing more crowding and wear-and-tear on Craneford West Field and Kneller Gardens. Welcome condition to protect and enhance the DNR, noting new regulations require environmental enhancement and all Site Allocations should reflect this.</p> <ul style="list-style-type: none"> • A comment do not agree with supporter capacity increase, significant congestion and disruption on rugby fixture days, and fixtures have increased. Agree with improvements to hotel facilities for appropriate uses and indoor sports. • A comment that text about the new hotel, leisure centre, hospitality and conference facilities have been delivered and should be deleted. Whitton Brook runs under the site and should seek this is uncovered. 	<ul style="list-style-type: none"> • No amendments recommended to the identified appropriateness of additional facilities, as the wording is considered to make clear that these are to be complementary to the primary sporting use. • No amendments to the wording with reference to ecology are recommended, noting that the Site Allocation already requires protection and where possible enhancement of the River Crane corridor.
Site Allocation 14: Mereway Day Centre, Mereway Road, Twickenham	
<ul style="list-style-type: none"> • A comment that residents would be willing to buy part of the site to offset the cost of a local amenity. The site has been disused for many years, known for a number of issues. It would benefit from being used for public good, and as a green space (naturally extends from the Nature Reserve) and, if the preferred option of turning it into a green space is not possible, there may be low impact options for low-rise education/nursery or selling part of the land to residents. • A comment agreeing with the proposals for social and community use. • Thames Water do not identify any infrastructure concerns but set out advice for a developer to consider the water supply / wastewater / surface water drainage. • The Environment Agency are pleased to see desire to protect and enhance the River Crane, which does not achieve good ecological potential. There should be a commitment to 20% net gain for the river as part of any development, and to contribute to the aims of the Lower River Crane Restoration Strategy vision to re-naturalise. • A comment objecting to redevelopment for a social or community infrastructure use due to congested traffic/parking/dangerous junction and no possible access to public transport (same apply to affordable housing). Optimum use of the land to extend the Nature Reserve/Kneller Gardens, or a one storey nature classroom for children. Suggest changes to refer to 8m 	<ul style="list-style-type: none"> • Added reference to recently submitted planning application. • No changes recommended to the boundary of the Site Allocation, in recognition of the Council’s preference that the site comes forward for comprehensive development rather than partial. • No amendments recommending regarding flood risk, noting that the new format identifies the flood constraints for the site. • No amendments recommending regarding the proposed appropriate land uses, which are considered to be appropriate for the site and the area. • No amendments to the wording with reference to ecology are recommended, noting that the Site Allocation already requires protection and where possible enhancement of the River Crane corridor.

<p>undeveloped corridor and LP18 and providing public access to riverside, and developments should contribute to creating a new metropolitan park that provides a link between Hounslow Heath and the River Thames.</p> <ul style="list-style-type: none"> • FORCE comment if the site is to be used for social or community infrastructure support the inclusion of a River Crane-focused element, from interpretation boards to a river garden or ecology centre. Support the reference to enhance the River Crane corridor and would like to see public access. In light of potential residential on SA 12 and SA 13, the Council could consider leaving undeveloped as a new green space. • A comment objecting to redevelopment for social or community infrastructure as traffic and parking already congested, and a dangerous junction (same apply to affordable housing). Best use to add space to Kneller Gardens/Nature Reserve. 	
Site Allocation 15: Station Yard, Twickenham	
<ul style="list-style-type: none"> • TfL welcome reference to bus standards, but the requirement should be clarified that if redeveloped or reprovided this should only be with the agreement of TfL and standing capacity (as well as drivers' facilities) must be maintained and enhanced. • TfL Commercial Development (part landowner) welcome the Site Allocation. The land has ongoing operational requirements as a bus stand on event days at Twickenham Stadium, but should a suitable replacement location be found it will enable development to come forward. • A comment that housing development could reduce possibility of using the site for freight transportation by rail in the future. • Thames Water do not identify any infrastructure concerns but set out advice for a developer to consider the water supply / wastewater / surface water drainage, noting there are easements and wayleaves running through the site and public sewers crossing/close to the development. 	<ul style="list-style-type: none"> • Amendment to make clear that bus stand redevelopment/reprovision also requires consideration of standing capacity and drivers' facilities. • No changes recommended to the identified appropriateness of a residential scheme, which is considered to be appropriate for the site and the area. • No amendments recommending regarding flood risk, noting that the new format identifies the flood constraints for the site.
Site Allocation 16: Twickenham Telephone Exchange	
<ul style="list-style-type: none"> • A comment that the site could be purposed for housing needs as those are significant, while retail / commercial buildings are available to rent in close proximity to the site. 	<ul style="list-style-type: none"> • Replacement of refence to AMU with 'Main Town Centre' boundary. • No amendments recommended to the proposed appropriate land uses, which are considered to be appropriate for the site and the area.

<ul style="list-style-type: none"> • Thames Water do not identify any infrastructure concerns but set out advice for a developer to consider the water supply / wastewater / surface water drainage, noting the site is within 15 metres of underground waste water assets. 	<ul style="list-style-type: none"> • No amendments recommending regarding flood risk, noting that the new format identifies the flood constraints for the site.
Site Allocation 17: Twickenham Police Station	
<ul style="list-style-type: none"> • The Metropolitan Police Service state their Estates Strategy confirms the property is to be retained and the Site Allocation should be removed from the Plan as it unnecessary and may confuse local stakeholders as to the policing strategy in the area. • A comment this should be kept as a working Police Station. 	<ul style="list-style-type: none"> • The Site Allocation has been removed from the Plan.
Site Allocation 18: Twickenham Riverside and Water Lane/King Street	
<ul style="list-style-type: none"> • A comment raising concerns about the quantity of housing and retail. The site should be about public access, and preserving/reinstating river habitat. The Plan lacks biodiversity. • TfL welcome suggesting for a comprehensive approach to servicing and delivery and exploring a reduction in parking. Suggest this could be more directly worded to expect car parking to be removed on the Embankment. • A comment that the scheme is not offering improvement/enhancement to Diamond Jubilee Gardens, the public toilets are reduced to an aspiration, and the traffic scheme is dangerous. • A comment asking for the development to be special for everyone. • The PLA support seeking to maintain the embankment as a working quay and considering the impact on Eel Pie Island. This is important given the number of operational boatyards, which should be protected in line with London Plan Policy SI15. Also support the wider policy wording for Twickenham, Strawberry Hill & St Margarets stating future development in this area is expected to contribute to the environment including the River Thames riverside and Twickenham working waterfront. • The National Trust raise it is imperative to minimise any visual impact on the wider area, including Ham House. Development should conserve key areas and vistas to nearby green space and landmarks along the river, and may require a restriction on the height of new buildings. 	<ul style="list-style-type: none"> • Note: the majority of the comments received are observations of the recent planning application, and not comments on the Site Allocation itself. • Minor amendment to include reference to consideration of local views (which would include Ham House). • Amendment to remove reference to ‘where viable’ as part of requirement for improved flood defences. • No amendments to the reference to the reduction in car parking on the Embankment is recommended. The wording is considered to strike right balance between improving the environment of the Embankment through a reduction in car parking, and retaining some parking for the benefit of Eel Pie Island. • No amendments to the proposed appropriate land uses are recommended.

<ul style="list-style-type: none"> • A comment that the site was a park/open and flats should not be built on Diamond Jubilee Gardens. The modest building will not drive footfall nor attract large numbers of visitors. The viability requires subsidy and the Council should provide detailed justification why they want to depart from the Inspector’s findings on the Twickenham Area Action Plan. • The Environment Agency comment the site is in close proximity to the Tidal Thames statutory flood defences – support the reference to improvement and upgrading works but ‘where viable’ should be removed as these works are necessary. Recommend amended wording to refer to a riverside strategy approach including natural flood management techniques. • <i>Virtual event feedback</i>: Concerns were raised about biodiversity in Twickenham Riverside and the need to protect greenspace from infill development. 	
Place-based Strategy for Whitton & Heathfield	
<ul style="list-style-type: none"> • A comment does not address the main 20-minute neighbourhood challenge facing the area – lack of local employment, resulting in vast majority of people travelling out for work and very little entertainment, culture or restaurants, making the area one of the most car-dependent in the borough. Need to explore how the three railway bridges on Hanworth Road, Hospital Bridge Road and Nelson Road can be adapted so there are reasonable pavements and cycle facilities. Note that Ham, Petersham and Richmond Park have a strategy for a new bridge and seems odd the identified need for better bridges in Whitton has not made it in the Plan. • A comment there is a document describing wards and what is important about them; the Heathfield and Whitton wards not given much praise, but a key aspect missing. The Heathfield ward is unique in the UK as it has low cost or social housing right next to parks such as Heathfield Recreation Ground and Hounslow Heath. This is key in reducing inequalities in access to green spaces, and encouraging health and wellbeing for people on low incomes. This aspect needs to be recognised, protected and used as an example for the rest of the borough. • Dukes Education Group and Radnor House School Ltd disagree with vision for Kneller Hall and references to opening up for public access, as (<i>for reasons set out on Site Allocation 20</i>) the site cannot provide a public park or be publicly 	<ul style="list-style-type: none"> • Amendment to include ‘measures to improve cycling safety’ to give greater emphasis to this element of active travel in the Policy section. • Minor amendment to reference the improvement of air quality as a policy aspiration. • No changes to identified acceptable land uses for the area. The place-based strategy is considered to be in compliance with Local Policy 1. Living Locally and strikes the right balance between ensuring local employment opportunities, promoting a cultural and leisure offer and helping meet the Borough’s housing in need. • No amendment to reference improvements to Hanworth Road Bridge, Hospital Road Bridge or Nelson Road bridges given there are no known plans at present to undertake feasibility work for their upgrade as part of a wider strategy. • No amendment to make specific reference to the location of housing, including lower-cost housing, next to recreational grounds. The areas of open space in the area are already mentioned and the importance of these, including improvements to their access and connectivity, is also identified. • No amendment to refer to a plan for all vehicles to be electric powered in the near future, noting that this is not a transport target expressed in either national, regional or local policy. There is a general policy trend to improve

<p>accessible, and any access for the community must be managed to ensure pupil safety.</p> <ul style="list-style-type: none"> • A comment that the strategy is out of date already. No mention of how intend to address the provision to realise the borough’s ambition for all cars to be electric in a very few years’ time; need to have plans for every lamp post to be converted to a charging point, because majority of roads don’t have space for parking and allocated charging points. Turing House School will have a major detrimental impact on transport in/through Whitton, yet no mention is made of alleviating this in the short-term, current road layout amendments have prettified the two junctions in Hospital Bridge Road where roundabouts would have made more sense; add provision for a transport review in the short-term. 	<p>sustainable modes of transport, and it is felt that this aspiration is already adequately reflected in the place-based strategy.</p> <ul style="list-style-type: none"> • No amendment to reference transport impacts arising from Turing House school. The scheme has already been granted planning permission and the transport impacts were already fully assessed as part of that application, with provision for further analysis enabled via a further safety audit, which was secured via Heads of Terms as part of the permission. • No amendments to the reference to Kneller Hall, with regards the appropriate land uses and aspirations identified. The vision is based on the recently adopted SPD masterplan for the site, and whilst the aspirations of current landowner of a site will be given consideration, the purpose of the place-based strategy and Site Allocation is not intended to slavishly mirror these requirements where other uses and aspirations are also deemed to be appropriate by the Council. The Council has no control over who may be a future owner or developer for the site, and needs to make sure that the place-based strategy and Site Allocation is reflective of the Council’s general vision.
<p>Site Allocation 19: Telephone Exchange, Ashdale Close, Whitton</p>	
<ul style="list-style-type: none"> • Thames Water do not identify any infrastructure concerns but set out advice for a developer to consider the water supply / wastewater / surface water drainage. • A comment require an extension to the Library Way carpark as this will enable some car parking to be decanted from the High Street and other areas, will reduce conflict and enabled increased cycle lanes. 	<ul style="list-style-type: none"> • Amendment to text to refer to offices as an example of an appropriate floorspace, and addition of ‘or other commercial uses’ to create greater flexibility, with offices as one such option, in light of reduction in predicted office space needs in the updated Employment Land and Premises Needs Study evidence base. • No amendments to reference impact on water resources and infrastructure, which can be assessed against Policy 9 of this Plan. The updated Infrastructure Delivery Plan 2023 also identifies future infrastructure and service needs for the borough. • No amendment to include a reference to provision for an extension to Library Way carpark, noting that there is opportunity for this via a comprehensive redevelopment of the site as per the Site Allocation for Kneller Hall Telephone Exchange, though it would not be appropriate at this stage to include it as a specific requirement, noting the transport testing and consultation which would be required.
<p>Site Allocation 20: Kneller Hall, Whitton</p>	

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| <ul style="list-style-type: none"> • Historic England note the adopted SPD was accompanied by a heritage assessment, which helps form a useful baseline. Welcome emphasis upon reuse of historic buildings within the site. Commented on the draft SPD the area currently identified for greatest potential change includes at least one building (the Band Practice Room) identified as curtilage listed building and ascribed moderate heritage significance, which could benefit from further analysis and reference to this should be made. Site is in a Tier 2 Archaeological Priority Area, a desk-based assessment and potentially pre-determination fieldwork will be required to support future development proposals, with below-ground potential and post-medieval landscape garden remains; GLAAS should be consulted at an early stage. • FORCE support the requirement to provide habitat enhancement through creation of an east-west habitat corridor; would like an explicit requirement to de-culvert and naturalise Whitton Brook, which should have temperature-cooling, flood attenuation and ecological benefits. • Habitats & Heritage support provision of public open space in the SPD linking to wider work to improve access to the Duke of Northumberland River by the Crane Valley Partnership and others; hope the recent sale will not interfere with this vision. • A comment it's out of date already, written as through the future of Kneller Hall is unknown and the Plan speculates on what the site development might be. • A comment oppose idea a residential quarter is built on the western edge, would result in pressure to build on some of the MOL in time. A clear pattern of schools having to expand as the school curriculum expands and the school will need space to adapt. Site has clear heritage value and cramming in more residential will have a negative impact on the setting of the listed Kneller Hall and listed boundary wall. • Dukes Education Group and Radnor House School Limited (landowner) acquired the freehold interest of the entire site from the MOD in quarter 3 of 2021 and preapp discussions are taking place to convert to a day school. Dukes Education have significant experience in operating schools and in listed buildings. The existing Radnor House at Pope's Villa, Cross Deep, Twickenham caters for 440 pupils, age 9 (Year 5) to 18 (sixth form), and the school wishes to expand to | <ul style="list-style-type: none"> • The reformatted Site Allocations include a 'Context' section, within which greater detail of the characteristics and constraints of the site and surrounding area has been provided, including mention of the listed Band Room, Whitton Archaeological Priority Zone and the site's candidacy as a potential SINC. • An amendment has been made to remove the sentence 'Any proposal should provide for some employment floorspace, including offices', as employment-generating uses is already cited as an appropriate land use, though a further amendment has been made to reference 'including offices'. • An amendment has been made to include 'as part of any residential scheme' in the bullet point referring to a policy-compliant level of affordable housing, to clarify that this would apply where a proposal includes a residential use, and not for every application. • An amendment has been made to remove 'any residential development' from the requirement that development is sensitive to the historic building and responds positive to the setting of the heritage asset, as this requirement applies to any development, regardless of its type. • An amendment has been made to reference the opportunity to consolidate and reprovide the current footprint within the MOL in a new building, subject to scale, massing and impact on character and openness, for consistency with the wording in the Kneller Hall SPD 2020. • No amendment to make specific reference to opportunity to remove Whitton Brook from its culvert, as this would be too detailed for the scope of the Site Allocation, and is already identified in the Kneller Hall SPD 2020 as an option as part of wider SuDS opportunities on site. The Site Allocation already makes clear the expectation that future development has regard to the vision and requirements set out in the SPD. • No amendments to remove aspirations/requirements which do not directly tally with the details of the landowner's proposals in the current planning application submitted for Radnor House School, which remains under consideration. The Site Allocation vision is based on the adopted SPD masterplan for the site, and whilst the aspirations of a potential future developer of a site will be given consideration, the purpose of the place-based strategy and Site Allocation is not intended to mirror these requirements where |
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improve facilities and further grow the school. All pupils in Years 7 to 11 and in the sixth form will be relocated to Kneller Hall, and each year the school will grow in size with additional forms, up to a total of 750 pupils. Pope's Villa will solely be for Year 5 and 6 (junior school), growing to accommodate up to approximately 300 pupils. The two sites will be self-contained. Across the two sites a net increase of circa 80 jobs. The draft masterplan details: use of the main Grade II listed Kneller Hall, Guard Room and Band Practice Hall for education (use class F1), with demolition of some modern buildings and conversion of others to school use (use class F1), and new build to provide purpose-built buildings including sports facilities (use class F1), along with ancillary works to facilitate school use including sports facilities and Forest School programme and facilitation of managed access for local school and community groups. Details set out of an initial structural and conditions survey of the listed building and curtilage listed buildings which identified key issues and further investigations that are being undertaken, and the Mechanical and Electrical services and internal fit out and condition of the properties that must also be considered. Sets out the significant financial investment proposed to ensure the long term retention and preservation of the listed building and curtilage listed buildings, with cost consultant LXA estimate to circa £7million. The proposed use as a school is considered to be the optimum use for the building in heritage terms. Details representations on the draft site allocation, to reflect and acknowledge the significant investment and commitment associated with the restoration and enhancement of the Grade II listed building and its ongoing maintenance and upkeep, and that the Council's aspirations must be commercially realistic and acknowledge the constraints and limitations of the site. Flexibility on the potentially suitable land uses considered appropriate. It is not considered appropriate to deliver specific employment floorspace as the school needs the entire site; reference should be removed. It is not feasible or appropriate for open space to be provided; remove this reference and instead managed access to parts of the site can be provided. Should acknowledge the SPD was prepared prior to our acquisition of the site and provides one potential option, but the masterplan needs to evolve. Consider the entire site is required to meet educational requirements, so if

other uses and aspirations are also deemed to be appropriate by the Council. The Council has no control over whether a landowners aspirations could change, nor who may be a future owner or developer for the site, and needs to make sure that the place-based strategy and Site Allocation is reflective of the Council's general vision. Thus no amendments have been made with regards the following: identification of residential, employment-generating and office as appropriate land uses the Council would support; requirement for new public open space on site including improved active frontages and connectivity; identification of health uses as a possible form of appropriate social/community infrastructure on site.

- No amendment to remove residential as an appropriate land use, noting that the Site Allocation makes clear the requirement to protect the character and openness of the MOL and settings of heritage assets, and that Historic England have not raised an objection to the principle of residential uses on this basis.
- No amendment to remove office as an appropriate land use, noting that Local Plan Policy 23 allows for developments outside of town centres to provide a small amount of new office space, and the borough-wide need for this type of employment space.
- No amendment to remove requirement to provide new public open space and better connectivity, noting that land management and safeguarding matters can be weighed up and dealt with at full planning stage via a Community Management Plan.
- No amendment to reference to Kneller Hall SPD, which was adopted in 2020 and has weight in the decision-making process.
- No amendment to expected implementation timescale, noting that the full range of flexibility is included (short, medium and long) and does not conflict with the owner's aspirations for the new school to be on site by September 2023.
- No amendments to reference impact on water resources and infrastructure, which can be assessed against Policy 9 of this Plan. The updated Infrastructure Delivery Plan 2023 also identifies future infrastructure and service needs for the borough.

references to residential development are included it should be made clear this is one possible land use and is not a specific requirement. Remove the requirement for active frontages along Whitton Dene and Kneller Road, as conflicts with the requirement for listed buildings and structures to be retained and is not deliverable, nor is a visual and physical link to the existing community feasible or deliverable due to the need for pupil safeguarding. Expect the aspirations for the site can be delivered within the height development parameters. The requirement to deliver affordable housing will not be triggered, nor it is considered possible to deliver health uses apart from the wider school use. An ecologist has been appointed. It should be made clear the site is the 'former' home of military music. The existing built development within the MOL designation and the opportunity to re-provide the existing scattered built footprint within the MOL in a consolidated footprint, recognised in the SPD, should be stated in the site allocation. Increased permeability for pedestrians and cyclists through the site should be removed as it is not deliverable. The expected implementation timescale should be short and medium term. There are a number of other references where changes are not sought. In summary the main amendments to be addressed are: removal of requirements to deliver employment floorspace, public access, increased permeability and active frontages; recognise opportunity to consolidate and re-provide current built footprint within the MOL in new building(s); acknowledge SPD prepared prior to acquisition by the school; acknowledge significant financial investment required; acknowledge constraints of the site and client's proposals which limit the ability to deliver uses beyond the proposed education and associated sports facilities.

- Thames Water do not identify any infrastructure concerns but set out advice for a developer to consider the water supply / wastewater / surface water drainage; encourage any development to utilise green SuDS solutions.
- The CCG note the update with the new owner intending to transform the building into a school. On the western part of the site remains an opportunity to create a mixed use 'quarter', incorporating social infrastructure and community uses. The adopted SPD notes the GP practice catchments and the health bodies that should be engaged at an early stage to assess and mitigate any impacts

- No amendment to reference health Infrastructure, which can be assessed against Policy 49 and would be covered in the updated Infrastructure Delivery Plan.
- No amendment to reference to retention and possible upgrade of existing playing fields, noting that issues arising from compatibility of site uses and neighbouring amenities can be assessed against other policies in this Plan.

<p>that may arise on the capacity of health services in the locality. Suggest all options are considered, including provision of space within the development or developer contributions to increase capacity of health infrastructure in the area, noting the proximity of community spaces and opportunities to provide space to co-locate a range of health and wellbeing and community services.</p> <ul style="list-style-type: none"> • Sport England pleased to note specifies the playing fields should be retained and where possible upgraded; also important to ensure that any other uses do not prejudice the playing fields. 	
<p>Site Allocation 21: Whitton Community Centre, Percy Road, Whitton</p>	
<ul style="list-style-type: none"> • A comment the Whitton Community Association (operator of the Community Centre) welcome identification as a suitable location for new development as their current building has an outdated layout, is in poor condition and not energy efficient. It is intensively used by the local community and the case for a community space in the area remains strong, within reach of a diverse neighbourhood including some of borough’s most deprived communities. A new community building at such a prominent location should contribute to place-making for Whitton and Heathfield. More than one storey would be appropriate. Would not wish the Site Allocation to narrow options for needs-based community spaces across Whitton and Heathfield as a whole. Any policy should encourage complementary uses as neighbours/co-located within the same building to support joined up services/voluntary organisations and encourage integrated and flexible community spaces fit for the long-term. More intensive and coordinated use of sites may free up sites elsewhere for new uses (likely residential). Does not appear to be evidence/analysis to show this would be a good residential site, given adjoining uses. There is an 80-year-old ‘civic campus’ at Whitton Corner (school, health centre, day respite centre and church) alongside the community centre that should be valued as a coherent non-residential zone; concerned its effectiveness could be eroded by isolated new uses (noise-sensitive residential). Draw the site boundary wider (or describe the neighbouring context) as an important opportunity to create a masterplan for development that works more efficiently and releases other sites; suggest include St Augustine’s church’s temporary buildings (at southern 	<ul style="list-style-type: none"> • The reformatted Site Allocations include a ‘Context’ section, within which greater detail of the characteristics and constraints of the site and surrounding area has been provided. Reference is made to Whitton Community Centre and the local pharmacy as being a valued community service. The site is identified as forming part of a parcel of land within which a cluster of different uses serve the local community, including Whitton Corner, Homeline Day Respite Care Centre and St Augustine of Canterbury Church. Twickenham School is identified to the east, which also contains the Whitton Sports and Fitness Centre. • An amendment to the text to reference aspiration that redevelopment of the site should explore opportunities for complementary and greater joined-up services with neighbouring community uses. • No amendments to emphasise ‘place-making’ opportunities, given the site is already identified as a potential mid-rise building zone and thus Policy 45 would apply, the details of which do not need to be repeated in the Site Allocation. • No amendments to remove reference to residential as an appropriate land use. Retention/reprovision of the existing social/community use can be assessed against Policy 49. Whilst there is provision in this policy for a 100% affordable housing scheme to come forward without the need to provide social/community use and/or marketing evidence, the Site Allocation does make clear that on this site the Council would expect a mix of both uses. Matters relating to neighbouring amenities from co-location can be assessed under Policy 46 and controlled/mitigated at planning stage, noting that co-existence as part of a mixed-se scheme is supported by policy and also that the immediate site context already comprises some residential.

<p>boundary), Twickenham School car park and Methodist Church sites along Percy Road.</p> <ul style="list-style-type: none"> • A comment oppose idea can build residential accommodation above the community centre as incompatible land uses e.g. music noise and activity at the community centre late into the evening/night. The Site Allocation threatens its long-term future, there are few other music venues in Whitton, and would have a detrimental impact on the limited cultural scene in Whitton. A similar community association building in Hampton does not intend to have housing on top of it, so question why Whitton’s centre is targeted. A better approach to keep whole site in community use and re-provide the closed Heathfield Library and extra community space. 	
Place-based Strategy for Ham, Petersham & Richmond Park	
<ul style="list-style-type: none"> • A comment the Plan reiterates the call for a pedestrian/cyclist bridge between Ham and Twickenham which have not been supported by the River Thames Society as they ignore the needs of navigation at high tide, destroying mature trees and compromising open space and the viability of Hammerton’s ferry, and should be taken out. • The Royal Parks comment should be mention of Richmond Park in the policy, when noting the network of green spaces. • The Royal Parks comment should fully recognise the need to protect Richmond Park SAC, SSSI and NNR from all impacts associated with development including increased traffic, recreational pressure and light spill. Effective measures to reduce traffic in and through the Park should be included. • A comment that Richmond Park should be considered as a separate area requiring its own place-based strategy. Mention of SSSI requires explanation, and merits a geodiversity label (<i>see comment on Policy 39</i>). Mention the Royal Parks’ current strategy for decreasing number of vehicles in the Park and initiatives to introduce shuttle buses. • A comment that residential developments must take account of the impact of an increased population in respect of new development and occupation, as the local road infrastructure does not have the capacity to accommodate significantly more cars or lorries, and people prefer to use their cars. 	<ul style="list-style-type: none"> • Replacement of word ‘viable’ with ‘suitable’ when referencing location for possible cycle bridge, for better clarity. • Minor change recommended to include aim to improve the riverside environment. • No changes recommended to the place-based approach for the borough as a strategy. It is considered appropriate for Richmond Park to remain within this ‘place’ given the physical and perceptual relationship with Ham Common which ties it more to the Ham & Petersham Place. The vision is taken from the Neighbourhood Plan and has therefore not been changed. • No changes recommended to add details which are covered by other policies in the plan, including the protection of Richmond Park and the traffic restrictions, and how transport impacts of new development are assessed. • Reference to the aspiration for a new pedestrian and cycle bridge is considered appropriate.

<ul style="list-style-type: none"> • The Environment Agency recommend the vision should include “improving the riverside environment”. 	
Site Allocation 22: Ham Close, Ham	
<ul style="list-style-type: none"> • The National Trust raise any new development higher than 4 storeys would have a negative visual impact on the setting of Ham House, as residential development between Ham House and the site is predominantly low rise at 2 storeys. Suggest the maximum building height should be 4 storeys. • Richmond Housing Partnership (landowner) are working with Hill Residential (delivery partner) and are bringing forward an application for comprehensive redevelopment. The Site Allocation boundary should be amended to include a western strip of land (to enable replacement housing and a new makers lab) and hard standing on the eastern edge to the rear of the Ashburnham Road shopping parade (to deliver the community centre), and remove the Ham Clinic medical centre, to reflect the masterplan. Support the site proposal, context and timescales. Suggest the site proposal text could include reference to Hill Residential alongside RHP. • Hill Residential (delivery partner) are working with RHP and the Council and bringing forward an application for redevelopment. The Site Allocation boundary should be amended to include a western strip of land (to enable replacement housing and a new makers lab) and hard standing on the eastern edge to the rear of the Ashburnham Road shopping parade (to deliver the community centre), and remove the Ham Clinic medical centre, to reflect the masterplan. Support the site proposal, context and timescales. • Richmond Housing Partnership (landowner) and Hill Residential (deliver partner) welcome the vision and policy direction that this site can be a landmark scheme. • Thames Water state the scale of development is likely to require upgrades of the water supply network infrastructure and recommend early liaison and consideration of phasing to ensure upgrades are delivered ahead of occupation. Thames Water do not identify any infrastructure concerns for wastewater and management of surface water should follow London Plan Policy S113. Note there may be existing sewers or rising mains crossing the site, which may require diversion (financed by developer) or assessment of width of easement. 	<ul style="list-style-type: none"> • It is not considered necessary to include the area of hardstanding to the rear of the shops, although noted this reflected the support expressed by residents during consultation on the Ham Close masterplan for the development of this area, as it is referenced in the Neighbourhood Plan and this area can be incorporated into a proposal if needed. It is not considered appropriate to further amend the boundary to include the OOLTI and playing fields to the west, noting the designations and therefore strict requirements at planning stage for development this land to be supported, though simultaneously noting that omitting an area from a Site Allocation does not preclude development from coming forward on that land. It is also not considered appropriate to remove the medical centre from the boundary, given its siting in the site. • Some minor additions to the wording relating to design and heights, to mirror the wording in the Neighbourhood Plan with regards to the need to demonstrate positive benefits in townscape and local aesthetic quality and relate well to the local context. Further minor amendment to include need to consider impacts on views and setting of Ham House. • No amendments recommending regarding flood risk, noting that the new format identifies the flood constraints for the site.

<ul style="list-style-type: none"> • Ham and Petersham Neighbourhood Forum comment any development will need to address Neighbourhood Plan Policy H2 which states developments over 4 storeys will be acceptable if the proposal demonstrates positive benefits in terms of townscape and local aesthetic quality and relate well to the local context. • The CCG comment they and the Hounslow and Richmond Community Healthcare NHS Trust have been engaged in the proposals, noting services will continue to be provided from the Ham Clinic site. Suggest the Site Allocation boundary is amended to reflect the exclusion of the clinic site from the current proposal. There is no requirement for primary care services to be relocated within the redevelopment, although the impact of the additional demand on the Lock Road Surgery may necessitate the need for a developer contribution. 	
Site Allocation 23: Cassel Hospital, Ham Common, Ham	
<ul style="list-style-type: none"> • Richmond CVS comment given the long-term contribution of the hospital it would be appropriate to retain an element of the site as a mental health and well-being hub. • Ham and Petersham Neighbourhood Forum comment the Plan should discourage proposals that would lose the potential of opening spaces and gardens to the public, and reference the visual contribution of the buildings to the setting of Ham Common. • West London NHS Trust support the allocation of Cassel Hospital (landowner) and recognition that conversion or redevelopment for residential uses could be acceptable if it allows for the protection and restoration of listed buildings. Confirm the site is still in active use and the medium timeframe is appropriate. 	<ul style="list-style-type: none"> • A minor amendment to make clear that any development would need to protect and where possible enhance the character and openness of the designated open land. • No amendments to the identified appropriate land uses, as the Site Allocation already makes clear that the Hospital’s requirements are protected, and that social/community infrastructure uses must first of all be explored. • No amendments to the design/heritage references, which are considered to be adequate.
Place-based Strategy for Richmond & Richmond Hill	
<ul style="list-style-type: none"> • The Royal Parks comment should fully recognise the nature conservation designations of Richmond Park as immediately adjacent to this area. While policy encourages active travel and exercise, it should identify need to protect Richmond Park SAC, SSSI and NNNR from all impacts associated with development including increased traffic, recreational pressure and light spill. Effective measures to reduce traffic in and through the Park should be included. • A comment agree with the general objectives but less convinced Whittaker Square is a natural focus for visitors and is not an obvious destination. Should 	<ul style="list-style-type: none"> • Reword of reference to pilot Clean Air Zone to bring up to date. • Update to Retail and Leisure Needs Study reference to reflect updated report’s predictions for Richmond. • Relevant planning history section updated to reference recent planning permission granted. • Add reference to recreational pressures and nature conservation designations of Richmond Park.

be greater provision of public toilets and encourage this being provided by private enterprise e.g. advertising payments. Agree with improving North Sheen Residential Area; changes by TfL do not encourage this is achievable for public transport. Agree much could be made of area around Richmond Station although doubts about a building up to 8 storeys, not convinced the area is suitable for taller buildings and a cluster could change the appearance of the town centre.

- A comment the strategy fails to acknowledge the main challenge to the town centre has been the loss of the department store prompting other clothing retailers to leave. Needs to be a strategy to rebuild the comparison goods offer. Otherwise residents have to travel further and does not fit with living locally.
- A comment on the place definitions, and that the four Conservation Area components should be separately identified and the character area boundaries should match the Conservation Area boundaries.
- A comment the Richmond & Richmond Hill place should be titled as 'Richmond Town Centre and Riverside, Richmond and Richmond Hill Residential and North Sheen Residential', assuming accept the questionable concept and structure of the Urban Design Study.
- A comment that the vision relies on the RBID Vision Report as evidence; the RBID is established by businesses and there is likely to be a bias in favour of businesses. The areas covered by RBID are parts of the town centre, not Richmond Green where wholly oppose commercial use other than mixed use along Greenside. Concerned the democratic process may be at risk and needs to be resolved going forward. Not been able to find the Vision Report and not able to make a reasoned response on the RBID vision included in the Plan.
- A comment that the Old Deer Park Working Group recommend the Old Deer Park should be covered by its own Character Area.
- The Environment Agency state the vision should include 'improving the riverside environment'.
- A comment keep raising and told there is no budget for – the Sheen Road parade of shops does not have even, safe pavements.

- Add reference to promote Richmond area 'via active travel', reduction in car travel and improvement in air quality.
- Add reference to closure of House of Fraser as acknowledge impact on retail offer in Richmond town centre.
- Amend text to character area profile to more explicitly refer to the four Conservation Areas as core of town centre character area.
- Amendment to policy to reference enhancement of riverside environment.
- Retention of promotion of Whittaker Square as a new public space.
- No amendments proposed to character area boundaries, which are considered to be logical and appropriate.
- It is not considered that the Old Deer Park warrants its own character area, which would not be appropriate for the broader scale of the Urban Design Study.
- No amendment to reference to Be Richmond BID's objectives which, although not underpinning the Evidence Base of the Local Plan, are nevertheless considered to be relevant as an initiative the Council supports.
- No recommendation to include Sheen Road repaving in place-making strategy, which is of a more finer detail which is not appropriate for a strategic policy.

Site Allocation 24: Richmond Station, Richmond

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| <ul style="list-style-type: none"> • TfL welcome the aim of a comprehensive approach including transport interchange improvements; expect to be involved in early discussions and should be made clear in the Site Allocation. • A comment please plan a redevelopment of the station that includes exits from all platforms onto Church Road, to reduce local car journeys and provide more inclusive transport for people living east of the station. • A comment asking if redevelopment envisaged will be over the railway lines with the tall building on the site of the car park. Although the station façade is run down, it is a BTM and a good example of Art Deco, and architect believed to be same as for Surbiton Station which is listed. It merits proper restoration. A tall building over the top of the façade might not achieve the best aesthetic outcome. Support an integrated transport hub, but hard to envisage where buses would be based and relocating tals would be an improvement. • A comment do not support an air-rights development over the railway tracks. This will make public transport less attractive for those waiting for trains. Station has heritage value, extends to the walkways and generous circulation area at platform level and original 1930s features; some restoration could reveal the Art Deco heritage further. Many people visit Richmond as a pretty town on the river that feels less built up and proposal could undermine the tourism sector if development plonked on top. • A comment the title and draft text need substantial amendment. Title should refer not only to the station, but include the NCP car-park, parade of shops fronting The Quadrant, office block fronting Drummond's Place, parade of shops fronting Kew Road, Westminster House offices, and surface level car-park to north. A clear distinction needs to be made between proposals directly affecting the station and those affecting the other buildings, with different considerations that apply to the locally listed station complex and 19th century platform-canopies, to which there is no scope for redevelopment or Decking over the tracks, which would have a damaging impact on amenity and be inconsistent with national, London and local sustainability interests. Any significant increase in retail, leisure or entertainment uses is most likely to damage the viability and vitality of the heart of the town, and is likely to necessitate a significant level of vehicular servicing. This is not to suggest there | <ul style="list-style-type: none"> • Update to Retail and Leisure Needs Study reference to reflect to reflect updated report's predictions for Richmond. • Reference added to need for partnership working with National Rail and TfL. • Minor amendment to make clear that development must respond positively to the Conservation Area <u>and the</u> BTM. • Text referring to transport interchange improvements retained as worded, to remain high-level, as any proposals would require testing and input from transport providers; thus it would not be appropriate to set out specific and detailed requirements as part of the Site Allocation. • The site to be retained as a Tall Building Zone, based on the modelling undertaken by Arup as part of the UDS. Current wording, which does not separate the station from the remainder of the site, to be retained to allow for flexibility of future development. • Requirement for a retail offer to be retained, as this is considered appropriate for a station location and is not expected to negatively impact on the wider retail offer of Richmond. |
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<p>is no scope for enhancing the station complex. The Urban Design Study flawed analysis and recommendations including the opportunity for a landmark building is wholly unacceptable, unrealistic and needs to be omitted.</p> <ul style="list-style-type: none"> • See comment on Policy 45. To omit reference to acceptability of development above five storeys and delete or substantially amend Richmond Station tall and mid-rise building zone. 	
Site Allocation 25: Former House of Fraser, 16 Paved Court 20 King Street 4 To 8 And 10 Paved Court And 75 - 81 George Street, Richmond	
<ul style="list-style-type: none"> • A comment the text needs to be amended to reference any redevelopment provides for the enhancement of the external elevations of the existing 1960s building and removal of the existing roof plan enclosures to enhance views of the building from The Green and Hill Street, particularly in relation of the setting of the listed properties in Old Palace Terrace. Reference any extension or extensions to the existing buildings should rise no higher than the existing building (i.e. above four storeys); and for any replacement development. • A comment would like to see House of Fraser back again. 	<ul style="list-style-type: none"> • Update to Retail and Leisure Needs Study reference to reflect to reflect updated report's predictions for Richmond. • No amendment to text setting out design requirements, which is considered to adequately allow for sufficient assessment of more detailed aspects, such as elevational treatment, heights, townscape, heritage etc
Site Allocation 26: Richmond Telephone Exchange, Spring Terrace, Richmond	
<ul style="list-style-type: none"> • A comment support a low rise development of what is an eye sore. • A comment the text needs to be amended to reference any extension or extensions to the existing buildings should rise no higher than the three-storey part of the existing buildings; and for any replacement development. • A comment the site would benefit from demolition; the obvious replacement would be a single dwelling house to reinstate the single dwelling house at 7 Spring Terrace that was lost in the past, to accord with Policy 28 and ensure the design respond to the historic environment. 	<ul style="list-style-type: none"> • No amendment to text setting out design requirements, which is considered to adequately allow for sufficient assessment of more detailed aspects, such as elevational treatment, heights, townscape, heritage etc. • Retention of requirement for a refurb-first approach, in line with sustainability policies in the Plan.
Site Allocation 27: American University, Queens Road, Richmond	
<ul style="list-style-type: none"> • A comment support repurposing the site as education or mixed education/residential or residential. • A comment the text needs to be amended to reference any extension or extensions to the existing buildings should rise no higher than any of the existing buildings; and for any replacement or additional buildings. 	<ul style="list-style-type: none"> • Amendment to correct error regarding a heritage reference. • No changes to proposed appropriate land uses (educational, and then mixed-use social/community infrastructure). The site is not being recommended for a residential development, noting that this does not in itself preclude a residential scheme from being submitted and assessed against relevant policies in the Plan.

	<ul style="list-style-type: none"> • No amendment to text setting out design requirements, which is considered to already make clear the requirement for consideration of heritage assets, and would adequately allow for sufficient assessment of more detailed aspects, such as elevational treatment, heights, townscape, heritage etc.
Site Allocation 28: Homebase, Manor Road, East Sheen	
<ul style="list-style-type: none"> • TfL welcome requirement for retention of the existing bus terminus; helpful to clarify this comprises bus standing and drivers' facilities that should be retained and enhanced in any redevelopment in consultation with TfL. The site is adjacent to the TfL Road Network; early engagement should take place with TfL to assess potential impacts. • A comment the Urban Design Study has negated to account for the locally designated cottages on the NW border of the site, so does not follow the same recommendations of centrally-southerly siting of taller buildings with adequate buffer zones as it has for other sites. Anything above 6 storeys on the border will swamp the buildings and have a significantly deleterious impact on daylight of existing residents. The heat map shows no sufficient buffer, especially those directly next to the railway on Bardolph Road and southerly side of St George's Road, which along with Trinity Road and Trinity Cottages will mean homes left below BRE acceptable standards for light. Detailed summary and diagrams from the Daylight and Sunlight Report from the planning agents to show context and scale of the overshadowing. Support sensitive redevelopment of the site and a reasonable mid/lower rise solution. Noted struggle to register query on the consultation and that residents were not formally notified of the Local Plan consultation. • A comment support redevelopment but with a limit of 8 storeys. • Thames Water do not envisage any infrastructure concerns but set out advice for a developer to consider the water supply / wastewater, but as the site currently drains via infiltration are unable to fully assess the site for a sewer connection prior to completion of infiltration tests. • The CCG note the site allocations in this place, including the application on this site; the CCG has raised the need to provide a contribution to provide additional primary care capacity in the local area. 	<ul style="list-style-type: none"> • Minor amendment to include need to retain/reprovide standing and drivers' facilities as part of bus terminus. • Additional bullet point added to reference requirement to engage with TfL, and also to encourage active travel. • No changes to text of Site Allocation referencing Tall and Mid-Rise Building Zones, though the updated Urban Design Study amends the zone itself in the UDS to set it further back from the building line on the NW border, to reduce the impact on the BTMs. • No changes to text of Site Allocation regarding the prevailing character, which is considered to be sufficient, although the updated Urban Design Study makes specific reference to this in the character area profile. • No amendments recommending regarding flood risk, noting that the new format identifies the flood constraints for the site. • No amendment to reference health Infrastructure, which can be assessed against Policy 49 and is considered in the updated Infrastructure Delivery Plan.

<ul style="list-style-type: none"> • A comment noting this is not East Sheen. Given the Urban Design Study flawed analysis and recommendations, reference to the tall and mid-rise building zone should be deleted and state that any new development across the site to rise no higher than 4 storeys to relate to the predominantly 2 storey scale of nearby residential areas and the nearby Conservation Area. • A comment support up to 7 storeys and have objected to the current/past proposals notably the ridiculous 11 storeys development. 	
Site Allocation 29: Sainsbury's, Lower Richmond Road, Richmond	
<ul style="list-style-type: none"> • TfL comment the site is adjacent to the TfL Road Network; early engagement should take place with TfL to assess potential impacts. • A comment the loss of the supermarket would be a major reduction in amenities, but can see the sense in redeveloping the area to make better use of the space, and combine retail/residential provided the height is in keeping with surrounding, not higher than 6 storeys or 8 at most. Public transport and access would need to improve. • Thames Water state the scale of development is likely to require upgrades of the water supply network infrastructure and recommend early liaison and consideration of phasing to ensure upgrades are delivered ahead of occupation. Thames Water do not identify any infrastructure concerns for wastewater and management of surface water should follow London Plan Policy S113. Note the proposed development is within 15 metres of strategic sewer and a condition related to piling should be added to any permission. • A comment about the lack of mention of car parking, asking how much car parking will be required. If the car parking provision is too restrictive, the owners are unlikely to bring forward. • Sainsbury's (landowner) support the commitment to re-provide an equivalent amount of retail floorspace as part of any redevelopment; the allocation should also refer to the re-provision of adequate car parking, servicing and operational space on-site. The store trades well, with shoppers visiting on foot or by bicycle, however visits by car remain important with the majority of expenditure being on large, weekly shops, and parking is beneficial to those with larger families and less mobile/vulnerable. Any redevelopment should incorporate re-provision of car parking to London Plan levels (Table 10.5). 	<ul style="list-style-type: none"> • Additional bullet point added to reference requirement to engage with TfL, and also to encourage active travel. • Added reference to need to provide car parking provision for retail offer in line with London Plan standards. However, no prescriptive targets/limits have been included for a residential land use. • No amendments to inclusion of site as a Tall and Mid-Rise Building Zone, which is considered to be based on sound methodology as part of the UDS. • No amendments recommending regarding flood risk, noting that the new format identifies the flood constraints for the site.

<ul style="list-style-type: none"> • A comment given the Urban Design Study flawed analysis and recommendations, reference to the tall and mid-rise building zone should be deleted. • The CCG note the site allocations in this place, and the introduction of a residential use on this site, which will add to the pressure on local healthcare infrastructure. Welcome the opportunity to identify future healthcare requirements which could include new healthcare provision on the site. 	
Place-based Strategy for Kew	
<ul style="list-style-type: none"> • Royal Botanic Gardens Kew request details of the active travel opportunities referenced under other initiatives, noting there are no accessible routes through Kew Gardens Station and would encourage such initiatives. Support reference to improving wayfinding to RBG Kew. • Two comments that Old Deer Park should be covered by its own Character Area, within the Richmond & Richmond Hill area, and the Urban Design Study should be adjusted accordingly. The proposed structure of the character areas relating to Richmond, Kew and North Sheen are challenged as they relate neither to ward boundaries or existing Conservation Area boundaries, and should be based on the most part on present Conservation Areas. • St George Plc and Marks & Spencer support the principle of a place-based strategy for Kew, but suggest amendments to ensure consistency with Site Allocation 30 and their suggestions of amendments, including to refer to an element of replacement retail and small-scale complementary uses, a detailed assessment of surrounding townscape character and a comprehensive viewpoint study, a tall building zone circa 7-8 storeys, and proposals for buildings of height supported by justification including a comprehensive Heritage, Townscape and Visual Assessment. • A comment support the aim to promote active travel and reduce the dominance of vehicle traffic. 	<ul style="list-style-type: none"> • Amendment to reference improved accessibility as part of Kew Gardens Station upgrade. • No amendments necessary to provide detailed information on Kew Gardens Station improvements, given the high-level scope of the place-making strategy. • No amendments to make Old Deer Park its own character area or other alterations to the character area boundaries, the methodology and reasoning for which is set out in the Urban Design Study (UDS) and have been subject to consultation. • No amendments to the mention of acceptable land uses for Kew Retail Park, which are considered to be consistent with what is set out in the Site Allocation for that site. • No amendments to the section mentioning Kew Retail Park to include further details of the design objectives, which instead are set out in the Site Allocation. • No amendment to increase identified Tall and Mid Rise Building Zone for Kew Retail Park from 7 to 8 storeys. Heights have already been tested on this site as part of the UDS and 7 storeys is considered to be the maximum that can be accommodated.
Site Allocation 30: Kew Retail Park, Bessant Drive, Kew	
<ul style="list-style-type: none"> • A comment that a policy compliant level of affordable housing is necessary and the minimum level that should be aimed for. • A comment that Kew Retail Park works well as a local shopping centre, as larger than normal units make it a valuable and unique resource. Removing floorspace 	<ul style="list-style-type: none"> • Amendment to include ‘where feasible’ in relation to requirement to improve connectivity from Kew Retail Park to the River Thames. • No amendments to wording of acceptable land uses. Retail uses are not protected by policy and Local Plan and London Plan policies encourage new

to build homes is a mistake, given number of homes in area and the river barrier to access other areas. Higher rise development is inappropriate to the area and the quality of the local landscape; future developments need to be limited to the height of the existing Kew Riverside development.

- TfL comment the site is adjacent to the TfL Road Network; and welcome the reference to early engagement with TfL prior to a transport assessment.
- Historic England comment the cumulative impact of this site and Kew Biothane Plant need to be considered and referred to in the policies. Identified as suitable for tall and mid-rise buildings (max 7 storeys) and bounded to the north by more recent development 4-5 storeys so this is likely to be appropriate. Taller elements should be carefully located within the site and the policy could state this. Generally criteria helpful in managing how the historic environment is treated; modelled a height of 21m on Vu City to assess potential impacts on Kew WHS and while theoretically visible below the ridgeline of surrounding development and unlikely to be problematic with regards to Kew. An Archaeological desk based assessment will be required; should be early consultation with GLAAS.
- The CCG note adjacent to Levett Square new health facility; would welcome opportunity to discuss the potential healthcare impact.
- St George Plc and Marks & Spencer (landowner) strongly support the allocation of the site for redevelopment and are keen to work collaboratively to deliver a scheme. Key to this is ensuring an appropriately supportive site-specific policy, and set out recommendations as to how this could be strengthened and identify where consider there to be soundness issues, setting out detailed amendments. Set out details about the site including the planning context, site ownership and conditions for making the site available, and timescales. Support substantial residential development, suggest there is no need to repeat content covered in other policies (e.g. affordable housing). Policy should confirm the acceptability of increasing the amount of retail where this can be justified by the sequential and impact policy tests, and an improved retail offer is needed as there is existing access deficiency for main food shop needs on the basis of Living Locally. It is not a sound approach to restrict the acceptable amount of convenience retail floorspace to no more than existing. The acceptable amount

retail space to be directed to town centres. Retention of some retail space strikes the right balance between recognition of the popularity of Kew Retail Park and these policies. There is a need for additional housing in the Borough and this site is considered appropriate to help meet that need. A small amount of office space is considered to be complementary to the mix of uses and supported by a borough-wide need for more office space. The wording is considered to be sufficiently worded to allow for a range of uses, recognising the primacy of housing as part of a residential-led scheme.

- No amendment to requirement for new on-site Public Open Space, which is considered appropriate for a residential-led development in this location and in line with Policy 37.
- No amendment to identified Tall and Mid Rise Building Zone for Kew Retail Park, which is based on sound methodology as part of the Urban Design Study 2021 (UDS). The UDS references that the highest elements should be towards the centre of the zone.
- No amendment to mention of tree-lined avenues, given that these are characteristic of the area and therefore relevant to any future development design proposal.
- No amendments to mention archaeology, as the site is not in an Archaeological Priority Zone.
- No amendment to reference health Infrastructure, which can be assessed against Policy 49 and would be covered in the updated Infrastructure Delivery Plan.

<p>of retail floorspace should be dealt with at planning application stage through the sequential and impact policy tests. There should not be a requirement for provision of 'major' office development as the site is not in a town centre or designated employment area. The inclusion of a range of small-scale other uses that would add to vibrancy and vitality should be in a more flexible approach. The provision of open space is not consistent with Policy 37 and should be removed. Agree that improving permeability and connections to Kew Riverside and the River Thames is desirable, however issues outside of the landowners' control prevent direct options and suggest this is referred to as where feasible. Tree-lined avenues are too prescriptive. The building heights are not backed up by a robust evidence base and a range of heights across the site would be more suitable.</p>	
<p>Site Allocation 31: Kew Biothane Plant, Mellis Avenue, Kew</p>	
<ul style="list-style-type: none"> • A comment agree the site is suitable for housing, but do not believe developments higher than the height of the existing Kew Riverside can be justified due to the visual impact; most people do not want to live in high-rise developments. • Thames Water do not identify any infrastructure concerns but set out advice for a developer to consider the water supply / wastewater, and for surface water drainage would expect discharge directly to the River Thames; there are Thames Water assets running through the site and is within 15m of a Thames Water Sewage Pumping Station and strategic sewer which will need to be taken into account in future plans. • Historic England comment the cumulative impact of this site and Kew Retail Park need to be considered and referred to in the policies. An Archaeological desk based assessment will be required; should be early consultation with GLAAS. • The Environment Agency comment the site is within Flood Zone 3 and all sleeping accommodation must be above the tidal breach 2100 flood level. The site is next to statutory tidal Thames flood defences and raisings in line with TE2100 will be required, and sufficient set back between the development and flood defence to accommodate raisings and future maintenance (would not accept pushing the flood defence riverward as it would have a detrimental 	<ul style="list-style-type: none"> • Amendment to require consideration of nearby sewage works as part of any future residential scheme and need for an odour impact assessment upfront. • No amendments to design section, which already does identify support for tall buildings in this location. • No amendments recommending regarding flood risk, noting that the new format identifies the flood constraints for the site.

<p>impact on flood storage and the environment). Recommend refer to a Riverside Strategy Approach to achieving the TE2100 Plan flood defence raisings in this location. Recommend add to the wording on public open space to refer to multi-functional benefits including flood risk, flood storage and the Riverside Strategy Approach. The buffer zone should be planted with locally native species and form part of green infrastructure, free from all development including lighting; a working methods statement will need to detail how any buffer zone will be protected during construction.</p>	
Site Allocation 32: Pools on the Park and surroundings, Old Deer Park, Richmond	
<ul style="list-style-type: none"> • A comment agree the Council’s position. • Royal Botanic Gardens Kew note the site is in relatively close proximity; support the continued use for sports, however not any development that would adversely impact on the setting, views, heritage context etc. of Kew Gardens. • A comment the fourth bullet point needs to be amended to refer to the incomplete draft of the Statement of Significance which needs to be amended before formal adoption to take full account of the particular special interest and significance of the listed pools complex and its landscaped setting. The Old Deer Park Working Group have been pressing for amendment since 2018; the text also needs to take account of repeated community requests for the Pools complex and its surrounding landscape to be designated MOL. 	<ul style="list-style-type: none"> • No amendments to existing reference to significance of the Park and surroundings, which is considered to be sufficient. • No amendment to mention of Statement of Significance, which is currently noted as a draft on the Council’s website, and remains relevant to refer to. • No changes to the Metropolitan Open Land boundary of the Park to include the site, which is considered likely to score poorly against the 4 criteria set out in the Open Land Review 2021. • No amendments to support for sporting facilities required, as the text is already sufficient. • No amendments to support for biodiversity required, as the text is already sufficient.
Site Allocation 33: Richmond Athletic Association Ground, Old Deer Park, Richmond	
<ul style="list-style-type: none"> • Royal Botanic Gardens Kew note the site is in relatively close proximity; support the continued use for sports, however not any development that would adversely impact on the setting, views, heritage context etc. of Kew Gardens. • Two comments no change / agree the Council’s position. 	<ul style="list-style-type: none"> • No amendments to existing reference to significance of the Park and surroundings, which is considered to be sufficient.
Place-based Strategy for Mortlake & East Sheen	
<ul style="list-style-type: none"> • A comment the removal of the word ‘village’ before ‘heart’ is inconsistent with the vision wording; should retain the word ‘village’ for consistency and clarity with the Village Planning Guidance, Site Allocation and vision. Welcome reference to the Planning Brief to retain the relevance of this document into the future. Concern removal of the word village and the diagrams/Appendix 3 could 	<ul style="list-style-type: none"> • Minor amendment to text to include mention of improved accessibility with regards to aspirations for Mortlake Station and outside public realm. • Minor amendment to text to include improving the riverside environment as an aspiration for the place-making strategy.

create opportunity to excessively develop the site with buildings of 5-6-7 floors predominating and covering too great an extent of the site, conflicting with local context and heritage assets; should be greater emphasis on retaining and enhancing the village character. The School Place Planning Strategy may set out the requirement for a new secondary school but the clear need has been strongly challenged by the community. The Strategy does not take into account the likely damage/harms to the sustainability of existing secondary schools, nor impact assessment on the context or local infrastructure. Concern harm to the viability of existing 6th forms. An updated Strategy needs to take account of these factors and changes and reductions in population, despite reported arrivals from Hong Long there is spare capacity. Remove 'there is a clear need' until there is evidence to substantiate this claim.

- A comment key concerns are the stresses on the riverside corridor imposed by the addition of 1,114 new dwellings and a proposed secondary school, not anticipated in the 2011 Plan and would occasion at least 2400 movements per day in addition to those generated by the inhabitants of new dwellings. Raised issues about impediments for disabled persons, wheelchair users and young mothers unless development at Mortlake Station to enable tracks to be crossed when the gates are closed, foresee accidents at the crossing and a solution for station enhancement would be a wheelchair friendly underpass. Concern new dwellings will place a load on the water management of rain and dirty water draining built by the Victorians; must be assured consequence will not be raw sewage dumping in the Thames or more frequent flooding. Loss of the medical centre in the new Plan will add to travel for vulnerable and elderly people. Only half the school children will exercise every 2 weeks and half of those on MUGA. No specifics in terms of the social housing element including provision for key workers and special needs young persons needing supervised living. Efforts to reduce traffic on the A3003 have not been helped by lack of imagination for use of the river as a transport artery; a flaw not to bring the catamaran service which terminates in Putney up to Richmond, with Mortlake a stop on the route, which would also reduce traffic and pollution at Chalker's Corner.

- No amendments to reference to/omission of 'village', 'centre' and 'place' as these terms are considered to be interchangeable and do not alter the need for the design of any future development proposal to have regard to the character of the wider area, as set out in the relevant character areas of the Urban Design Study, Village Planning Guidance and Conservation Area appraisal where applicable.
- No amendments proposed to character area boundaries, which are considered to be logical and appropriate.
- No amendments to the reference to the Tall and Mid-Rise Building Zone as identified for the Stag Brewery site, which is based on a sound methodology which recognises the sensitivities of the surrounding context.
- No amendment to refer to a reduced number of homes proposed for the area, based on impact on water resources and sewerage. There is provision to assess these matters in Policy 9 (and flood risk against Policy 8) of this Plan and the updated Infrastructure Delivery Plan 2023 also identifies infrastructure and service needs for the borough.
- No amendments to the place-making strategy to include reference to an extended Thames Clipper service, noting this is operated by a private company and the Council is not aware of any plans to extend the service to Mortlake. It is not considered that the policy precludes this from happening, should there be any future plans.
- No amendments to include more specific details of cycle routes, noting that the policy is intended to as an identification of high-level aspirations for the area, and that the potential cycle route identified between Mortlake and East Sheen in TfL's Strategic Cycling Analysis is indicative and aspirational with no commitment from TfL at this stage to deliver.
- No amendment to include further details of the constraints from Richmond Park, beyond citing that the Mortlake and East Sheen area is located between the Park and the Thames, noting that the conservation designations are already listed in the place-making strategy for Ham, Petersham & Richmond Park, the Urban Design Study 'place area' within which the Park the located.
- No amendment to remove reference of Upper Richmond Road as a 'strategic corridor with growth potential', noting that adequate context is provided in the

<ul style="list-style-type: none"> • TfL note the reference to a potential cycle route between Mortlake and East Sheen in TfL’s Cycling Action Plan; this is indicative and more work will be required to determine the actual alignment of any cycle route. • The Royal Parks comment the area profile needs greater recognition of the nature conservation designations of Richmond Park (SAC, SSSI and NNR) as immediately adjacent to the area. While the policy encourages active travel and exercise, it should also identify need to protect Richmond Park SAC, SSSI and NNR from impacts associated with recreational pressure, as well as other impacts associated with development including increased traffic and light spill. Include measures to reduce traffic in vicinity of and through the Park. • A comment disappointed Upper Richmond Road (West) identified as a ‘strategic road corridor with growth potential’ as completely out of keeping with the look and feel of the local area. Similarly Manor Road allowing mid-size development along its length of up to 5 storeys also negatively changing the look and feel of the area. • A comment the Mortlake with East Sheen Society agree with the strategy, but disagree with the boundary of the area which has always defined its area as based on the Parish boundary of Mortlake with East Sheen, which equates better with the catchment area of the shopping centre but also the cultural quarters including our churches (used for cultural events). Note this includes the Mortlake Crematorium and adjacent cemetery, and excludes Christ’s School and its adjacent cemetery. Agree with the definitions of character areas H1, H2 and H3, but problems with the boundary between H4 and H5 - Martindale and Spencer Gardens on the north side of Christchurch Road are in character with H4, not H5, and Sheen Mount Primary School is split between both character areas which makes no sense; boundary needs refinement. Area profile does not mention several cemeteries in the area, including their importance as open spaces, nor the archaeological interest on the Brewery site. Pleased to see focus on town centre including improvement of public realm and creation of public areas at Milestone Green and elsewhere; however needs to be tempered with appraisal of air quality and what can be done to improve it. Public realm at Mortlake Station suggested previously as a Site Allocation and disappointed to see unlikely due to fragmented ownership; not true as Network Rail single 	<p>place-making strategy and UDS regarding the requirement for sympathetic development which respects the character of the area.</p> <ul style="list-style-type: none"> • No amendments to the text regarding Manor Road, noting that Manor Road is not specifically mentioned in the place-making strategy for Mortlake and East Sheen and is not identified as a mid-rise zone along its length or as ‘ripe for development’. A tall and mid-rise building zone is identified at the north end of Manor Road, which is located in the Richmond and Richmond Hill place area, the appropriateness of which has been tested and is soundly justified in the UDS. • No amendments to list the area’s cemeteries, as the place-making strategy already references open spaces and places of wildlife habitat as a characteristic of the area. • No amendment to include Mortlake Station as a Site Allocation, noting that there is no known likelihood of redevelopment of the site coming forward, and that aspirations for the area, such as improved public realm, are referenced separately in the place-making strategy and are not reason enough to designate for a Site Allocation. • No amendments to description of the character of the riverside area near the Stag Brewery site, which is considered to be sufficient. However, an amendment has been made to the Urban Design Study to reference the Arcadian nature. • No amendments to the reference to the requirement of a new secondary school and sixth form at the Stag Brewery site, the need for which is evidenced in the adopted School Place Planning Strategy February 2018 and most up-to-date draft Strategy January 2023. Both documents are based on a detailed and reasoned methodology which demonstrated the need for a fourth state-funded secondary school in the eastern half of the Borough. Concerns and comments raised by objectors to the new school with regards to recent population trends and impact on existing sixth forms, are addressed in the Strategy. • No amendments to the place-making strategy, to remove reference to the need for a new school, on grounds of context or infrastructure. These matters can be assessed under other policies in this Plan and the updated IDP 2023 also identifies future infrastructure and service needs in the borough.
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<p>owner. Pleased to see mention of Mortlake Riverside and Thames Path, but would like to see reference to the river’s arcadian setting mentioned.</p> <ul style="list-style-type: none"> • The Environment Agency comment the vision and sixth bullet point should include ‘improving/enhancing the riverside environment’. Include replacing active flood defences (e.g. flood gates) with passive ones (e.g. walls and embankments); if new developments are unable to design out these features, they should reduce flood risk by raising the sills of these structures. • A comment note the reference in the vision to a village, consistent with the 2011 planning brief which refers to making a new village heart for Mortlake; applications should be consistent with this ‘village’ approach, not an urban approach. Statement about creating a new quarter is inconsistent with this, as is the statement about links between the river and the ‘town’. • The South West London and St George’s Mental Health NHS Trust comment the strategy refers to the expectation the Barnes Hospital site redevelopment will provide a new SEN school and health centre, along with residential. There is an extant outline permission, however subject to other Plan policies this should be amended to reflect the policy position if the requirement for the community use changes / falls away (<i>see also comment on Site Allocation 37</i>). 	<ul style="list-style-type: none"> • No amendment to reference to the Stag Brewery site as a Site Allocation in the place-making strategy on basis of impact on river corridor. The Site Allocation text is based on the constraints and opportunities set out in the adopted Stag Brewery planning brief, wherein creation of improved linkages and enhancement of the landscape around the site and along the river is highlighted. There is also provision to assess development’s impact in Policy 34. • No amendment to reference to the Stag Brewery site in the place-making strategy as a Site Allocation based on the impact of the existing playing fields. The Site Allocation supports the retention and/or reprovision of the designated playing fields and matters relating to their sports use, impact on OOLTI and ecology can be assessed against Policies 36, 37, 38 & 39 of this Plan. • No amendments to reference to the Stag Brewery Site in the place-making strategy as a Site Allocation where comments relate to a previous or current planning application, and are not a direct comment on the texts of either the place-making strategy or the Site Allocation, for example, playspace provision. These would be matters assessed at full planning stage, and assessed against relevant policies in the Local Plan accordingly. • No amendment to reference to Barnes Hospital in the place-making strategy as a Site Allocation on basis of ‘loss of medical centre amenity’ as the Site Allocation makes clear that reprovision of primary and community healthcare services on this site are and appropriate land use which would be supported. • No amendment to the place-making text in reference to the Barnes Hospital site, regarding the policy requirements should a community/social infrastructure use not be proposed. This is set out in more detail in the Site Allocation itself, and is also covered in relevant policies (49 & 11) in the Plan.
Site Allocation 34: Stag Brewery, Lower Richmond Road, Mortlake	
<ul style="list-style-type: none"> • The Department for Education support the allocation to facilitate delivery of a secondary school and meet clearly identified need. DfE Pupil Place Planning Team have confirmed the area contains only 3 of the borough’s 11 state-funded secondary schools and has experienced a sizeable demand for places for some years. Demand could not be addressed through permanent expansion of existing school(s). Projected shortfall of secondary places in 2025/26 at both phase and year of entry level, without even taking into account need that will 	<ul style="list-style-type: none"> • Removal of reference to Area of Mixed Use in recognition that these designations are no longer being taken forward in the Plan. • Minor amendment to add ‘if appropriate’ to requirement to relocate the bus stopping/turning facility from Avondale Road bus station, in recognition that TfL’s review of bus services in the wider area has been delayed and in light of uncertainties of Hammersmith Bridge closure. • Ownership reference amended to cite towpath in public ownership.

arise from additional development. Area of London which does not have a large surplus of school places, with unplaced Y7 pupils and existing schools operating bulge classes for 3 years until the new free school opens.

- TfL support the requirement for bus standing space within the site, but does not support the closure of the Avondale Road bus station.
- Historic England comment the heights set out in Appendix 3 reflect those in the adopted site-specific SPD which have been generally accepted as appropriate. Links back to the UDS are helpful but would be improved by drawing out aspects of the site's significance not just based on distance or visual aspects, and assessment requires a careful judgement. An archaeological Desk Based Assessment will be required as located in Tier 2 Mortlake APA; GLAAS should be consulted at an early stage.
- A comment urge protection of the playing fields and also create a neighbourhood park/garden in that location to add to the sense of heart of the village/community. The only opportunity for decades to come.
- A comment pleased to see reference to the planning brief and the continuation of its 7 storey height which has been reinforced in the UDS. Continue to disagree that there is a clear need for a new 6-form of entry secondary school plus sixth form replacing primary school in the brief, as: no demand for the secondary school as primary school numbers been in steady decline for last 10 years; threaten viability of 6th forms at RPA and Christ's School; deny possibility of Thomson House Primary School relocating from its current two sites; reduce land requirement for housing and affordable component; require existing playing fields to be all weathered with unsightly fencing and floodlights; generate large numbers of cyclists and pedestrians encountering problems at level crossing on Sheen Lane and at crossing of heavily-trafficked Lower Richmond Road. Maintain that the re-distributed OOLTI into a series of courtyards, which will be overshadowed and likely private open spaces in gated communities, represents a failure in terms of both quality and openness. Elaborate on mention of the Archaeological Priority Area. No mention of flood risk and need to install storm surge flood mitigation measures. Note the comments of the Mortlake with East Sheen Society may change in next few months when comment on the forthcoming planning applications.

- No changes to text of Site Allocation regarding the site's characteristics, noting that the general reformatting includes a section on 'Context', though Arup are in agreement to amend the Urban Design Study to include additional wording to draw out further the site's significance.
- No changes to text of Site Allocation to reference archaeology, noting that the general reformatting includes a 'Heritage' section wherein the Archaeological Priority Zone is identified, though Arup are in agreement to amend the Urban Design Study to include additional wording to reference the potential archaeological significance of the site.
- No amendment to the text to reference a desired new park/garden, noting that the Site Allocation already makes clear that provision of new green space is required.
- No amendment to text to reference a café, as there is already mention of this.
- No amendments to the reference to the requirement of a new secondary school and sixth form at the site, the need for which is evidenced in the adopted School Place Planning Strategy February 2018 and most up-to-date draft Strategy January 2023. Both documents are based on a detailed and reasoned methodology which demonstrated the need for a fourth state-funded secondary school in the eastern half of the Borough. Concerns and comments raised by objectors to the new school with regards to recent population trends, impact on primary schools, impact on secondary schools, impact on existing sixth forms, alternative sites and impact on relocation of Thomson House Primary School are addressed in the Strategy.
- The principle of a new school is considered to be justified and sound. No amendments to the reference to the requirement of new school, based on impact on existing playing fields. Reprovision/upgrading of playing fields can be assessed under Local Plan Policies 36 & 37.
- No amendments based on impact on pedestrian and cyclist safety, as the Site Allocation makes clear that the Council expect development to deliver improvements to sustainable modes of travel, as identified in the Stag Brewery site planning brief, on which the Site Allocation is based.
- No amendments based on air pollution, as the Site Allocation makes clear that strict mitigation measures will be required.

<ul style="list-style-type: none"> • A comment redeveloping the site is a laudable and necessary aim, as is providing a new heart for Mortlake. Developing to such an extent and density is not. Question need to do a school. Lack of definitive affordable housing provision and any form of industry. Suggest reversion of heights to original 2011 plan and engagements with Mortlake Brewery Community Group who live in community and have a better proposal detailed. • A comment need for a secondary school is highly questionable, as submission by Mortlake Brewery Community Group demonstrates would be better to relocate Thomson House School and ease congestion at the level crossing. • A comment the need for a new secondary school plus 6th form is not supported by evidence, with the Council having consistently over-projected demand relative to what has transpired; the Mortlake Brewery Community Group have produced a detailed evidence base demonstrating there is no requirement for places that cannot be discharged by temporarily expanding existing schools, which will be negatively impacted by the new school. Further the impact would be disproportionate taking in context of traffic and emissions of noxious gases. Delete references to secondary school, or replace with primary. A primary school will be required to respond to anticipated local demographic change, by development of Stag and other sites, which will displace existing primary catchments. It is a legal obligation to provide sufficient primary school places, and the NPPF references locally as young children cannot travel unaccompanied and only for shorter distances. Council to make available evidence base showing these obligations will be discharged, including basis of proposed residential tenure split. Ideally planning for future primary school provision will involve moving Thomson House to the site. Add reference that the planning brief was reaffirmed as the appropriate basis for development in the 2017 Local Plan. Add reference to new village heart for Mortlake per 2011 SPD. Delete reference to a new secondary school/quality this to reference an expanded primary school. Due assessment must be made of alternative sites for locating a secondary school, consider all material factors including accessibility, impact on emissions, risk of places being lost to out of authority pupil; it is not appropriate to limit assessment to ease of navigating planning restrictions (as previously) – Barn Elms would be a better location holistically. Provision of affordable 	<ul style="list-style-type: none"> • No amendment where comments relate to a previous or current planning application, and are not a direct comment on the text of the Site Allocation, for example, the standard of re-provided OOLTI proposed in a planning application. The Site Allocation text is consistent with the requirements set out in Policy 36 and no amendments to the text are required. More detailed matters would be assessed at full planning stage, and assessed against relevant policies in the Local Plan accordingly. • No amendments regarding flood risk, noting that the new format identifies the flood constraints for the site. • No amendments to the proposed land uses, noting that the Site Allocation does not preclude an industrial use on site as part of a mixed-use scheme. • No amendments to specify density, noting that there is no longer a Density Matrix in the London Plan in favour of a more flexible approach which responds to site-specific context. • No amendments to the reference to proposed heights or the identified Tall and Mid-Rise Building Zone, which is based on a sound methodology which recognises the sensitivities of the surrounding context. • No amendment to reference the proposals of Mortlake Brewery Community Group. The Site Allocation does not preclude any group or developer from submitting a planning application for the site. • No requirement to reference the currently adopted Local Plan (2018) as the new Plan will supersede this. • No amendments to reference to/omission of ‘village’, ‘centre’ and ‘place’ as these terms are considered to be interchangeable and do not alter the need for the design of any future development proposal to have regard to the character of the wider area, as set out in the relevant character areas of the Urban Design Study, Village Planning Guidance and Conservation Area appraisal where applicable. • No amendments to specify tenure within the affordable housing provision, as this can already be assessed under Policy 11. • No amendments to the Site Allocation to designate the playing fields as Local Green Space. The sports fields were omitted from the recent updated Open
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housing should be to appropriate tenure mix spread across the site and avoiding a concentration in one area. Air Quality Focus Area delete reference to secondary school, and regard should be had to impact on Working Mums nursery, imperative Lower Richmond Road does not become more congested/higher emissions – suggest a second, independent traffic and emissions assessment. Playing fields should be retained, with any reprovision scrutinised allowing in truly limited circumstances; roads, a school and a bus turnaround would not satisfy requirements and any area with a fence will cease to be ‘open’ – reference to within the site is not appropriate. Advance an application at the community’s request for designation of the playing fields as Local Green Space. Be more specific about areas of height; add reference to the requirements of the SPD that taller buildings should be located at the centre and heights decline towards the perimeter. Add reference to condition of adequate improvements to the dangerous level crossing in the vicinity, in consultation with Network Rail and other stakeholders. A public footpath runs to the north of the development and needs to be restored. Consider these comments along with detailed representations on the present 2017 Local Plan; comments represent the Community Liaison Group and general consensus, residents of Williams Lane and Wadham Mews.

- Thames Water comment the scale of development is likely to require upgrades of the water supply network infrastructure and upgrades to the wastewater network and recommend early liaison to agree a housing and infrastructure phasing plan. Set out advice for a developer to consider, and for surface water drainage would expect discharge directly to the River Thames.
- The Environment Agency comment the site is within fluvial/tidal Flood Zone 3 and in close proximity to statutory Thames Tidal flood defences. Applications must consider TE2100 raising requirements in their design. Any future application must have fixed flood defence line and remove any flood gates. Recommend refer to a Riverside Strategy Approach to achieving the TE2100 Plan flood defence raisings and ambition for a permanent fixed flood defence line.
- The CCG note a significant number of homes proposed; have been engaged in the planning applications and note a new application is likely.

Land Review 2022 due to the site’s inclusion as a Site Allocation and in recognition of the live planning applications for the site.

- No amendments to reference towpath, which is identified in the reformatted ‘Context’ section. Improvements to the towpath are mentioned in the planning brief, on which the Site Allocation is based. The text makes reference to having regard to the brief, thus no further amendments are required.
- No amendments to reference to construction matters, which would be assessed at planning stage under Policy 48.
- No amendments to reference impact on water resources and infrastructure, which can be assessed against Policy 9 of this Plan. The updated Infrastructure Delivery Plan 2023 also identifies future infrastructure and service needs for the borough.
- No amendments to reference a Riverside Strategy Approach, as the Site Allocation already makes clear that flood risk benefits, urban greening and public realm improvements are expected.
- No amendments to specify biodiversity, provision for bats and a wildlife corridor. The Site Allocation refers to the need to have regard to the site planning brief, which specifies the requirement for a new green space linking Mortlake Green to the Thames and river and ecological enhancement, and there is already scope to assess these issues in the Local Plan against Policies 38, 39 and 40. Implications for bats would be addressed at planning stage as part of a Preliminary Ecological Assessment, the submission of which would be a mandatory requirement for any future planning application.

<ul style="list-style-type: none"> Richmond Bat Species Action Plan Steering Group comment development should include greater provision for biodiversity incorporating provision for roosting bats, including a wildlife corridor between river and Mortlake Green (see comment on Policy 34). 	
Site Allocation 35: Mortlake and Barnes Delivery Office, Mortlake	
<ul style="list-style-type: none"> Royal Mail Group (landowner) comment that Royal Mail have a statutory duty to collect and deliver letters six days a week at an affordable and geographically uniform price to every address in the UK, with minimum standards regulated by Ofcom; meeting high specification performance obligations is in the public interest and should not be affected detrimentally by any highways or development project. Royal Mail currently occupies and are the freeholder of the site, for sorting and distributing mail, with vehicular access from Vineyard Path and operational 24 hours a day, 6 days a week. The delivery office is of strategic importance to Royal Mail to continue to fulfil their statutory duty, and not currently available for development. Support the proposed allocation for redevelopment, should Royal Mail operations cease or be relocated in the future. However, should refer to mixed-use development including new homes. 	<ul style="list-style-type: none"> Amendment to remove reference to the Area of Mixed Use, in recognition that these designations are no longer taken forward in the Plan. Amendment to include reference to the Article 4 Direction, to which the site is subject, which removed permitted development rights for change of use from Class E (commercial) to residential. Minor amendment to clarify that residential uses would be considered as part of an employment-led mixed-use scheme which retains and intensifies employment-generating uses on site. No amendments to inclusion of site as a Site Allocation despite there being no immediate plans from Royal Mail Group to dispose of the site, noting their support for the site's allocation.
Site Allocation 36: Telephone Exchange and 172-176 Upper Richmond Road West, East Sheen	
<ul style="list-style-type: none"> A comment should note permission has been granted and implemented for change of use to a gym; the rear end of the gym site and the closed access to the site off Paynesfield Avenue are derelict and unsightly. 	<ul style="list-style-type: none"> No amendment regarding the implemented change of use to a gym as this is already referenced in the text. No amendments to reference existing access quality as this would be address at planning stage against Local Plan policies relating to design and access.
Site Allocation 37: Barnes Hospital, East Sheen	
<ul style="list-style-type: none"> The Department for Education support the allocation for a SEND school. The need for SEND school provision is generally rising across all LPAs and in Richmond is clearly acknowledged. DfE support is evidence through the approval of funding in 2019. Outline permission was granted in 2020 although further feasibility since demonstrates the site area for the school is significantly smaller than usually required, efforts are being made to optimise the site area and the final site layout may be different. The CCG note the permission granted in 2020 included a health centre, and the allocation refers to the possibility of locating primary and/or community health 	<ul style="list-style-type: none"> Inclusion of a sentence in the 'Flood Risk' section within the reformatted 'Context' section of the Site Allocation, to highlight the EA's intended flood risk review, noting that no changes to the flood risk for this site have been indicated or confirmed at this time. No amendments to Site Allocation based on the current planning applications which have recently been submitted. The text does not preclude amended schemes from the extant permission from coming forward and being assessed, subject to their compliance with the aspirations of the Site Allocation.

services on the site. The outline includes a new healthcare facility which will accommodate mental health outpatient services provided by South West London and St George's Mental Health NHS Trust; there will not be a need to relocate primary health services onto the site.

- A comment there is no guidance about height and density and what can be accepted in relation to poor access from South Worple Way. Outline permission for 83 housing units has been granted, which believe is the maximum; any increase should not be considered.
- South West London and St George's Mental Health NHS Trust (landowner) set out an overview of the Trust and the site. A programme of modernisation of mental health facilities is underway. Outline permission was granted in 2020 and a drop-in amended application is under consideration. Consideration has been given to the NPPF and London Plan context. The Site Allocation is in principle supported. The Trust and LocatED are progressing feasibility studies to maximise opportunities for a health centre and a SEN school. Support the opportunity of alternative uses such as housing, however the policy should reflect London Plan Policy S1 regarding loss being part of a wider transformation plan.
- The Environment Agency note the site is in Flood Zone 1, however due to review the Beverley Brook flood modelling which could potentially result in a higher flood risk designation, and impact on any sequential testing. Recommend no current action required from the LPA.
- Thames Water do not identify any infrastructure concerns but set out advice for a developer to consider the water supply / wastewater / surface water drainage.

- No amendments to remove aspiration of primary or community healthcare facilities on site in light of South West London CCG's assertion that new residential uses on site would not require this. The site has an existing social infrastructure use on site, thus Local Plan policies require its retention/reprovision, and noting too South West London and St George's Mental Health NHS Trust's intention to provide a new healthcare facility on this site.
- No amendments to provide a maximum height, density or number of units for a residential development on site. The Site Allocations are not intended to provide prescriptive targets of this level of detail, beyond identifying where a site has been designated as a Tall and Mid-Rise Building Zone, the on-site and nearby planning, heritage and open land constraints to which a development must respond, and stressing the need to have regarding to the relevant character areas in the Urban Design Study and Village Planning Guidance. Further, there is no longer a density matrix to which a development must comply in the London Plan, to enable account to be taken of other factors relevant to optimising the potential of a site, such as local context, design, viability and transport capacity.
- No amendments to provide more specific details of access arrangements. The Site Allocations are intended as high-level aspirations from development on a site and more detailed matters, such as access, would be assessed at planning stage against transport policies 47 and 48.
- No amendments to reference London Plan Policy S1 regarding loss of social infrastructure being part of a wider transformation plan and the acceptability of other replacement uses, such as residential. The Site Allocation already references Local Plan Policy 49 wherein Parts D and E relate to the acceptability of other land uses where the loss of social/community infrastructure has been justified.
- No amendments to reference impact on water resources and infrastructure, which can be assessed against Policy 9 of this Plan. The updated Infrastructure Delivery Plan 2023 also identifies future infrastructure and service needs for the borough.

<ul style="list-style-type: none"> • Barnes Community Association support the ambition. Welcome the particular focus on the Castelnau shopping parade although have found obstacles to improvement. Improvements to Barnes High Street are being implemented, and would welcome full road closures for events. Ambition is to improve connectivity between the river and replace a section of concrete flood defence with glass. Further investment would aid wayfinding, working on link between the station and the village and would welcome support for a safer crossing at Station Road and at Mill Hill. Also discussing need to review Station Road parking arrangements to prioritise local residents. Agree need to improve shopping at Priest's Bridge and support businesses in White Hart Lane including a new parking scheme. Ambition to open up Barnes Waterside to water sports and recreational activities, and discussions already underway including for a river pool at the dock area with temporary pop-up amenities. Urgent need for resurfacing some sections of the towpath. Welcome support for the green walkway along Barnes Bridge. • A comment on parking in Station Road, where it is difficult to pass if a car is coming the other way (could be made one way) and questioning why there is free, unlimited parking which attracts drivers from elsewhere, and should be made no parking, or pay and display. • The Environment Agency seek clarification that any pedestrianisation of The Terrace should not over sail or impede their ability to inspect any tidal flood defence element, and there should not be encroachment or overhanging of the River Thames. • A comment on the traffic congestion in the Barnes area and impact on air quality. Concern about the garden bridge on the redundant railway bridge, which may be needed for disaster management. • A comment raising other local issues in relation to transport and a suggested route change of the 378 bus, and in relation to the private road belonging to Wandsworth Council outside 5&7 Queen Elizabeth Walk which has no footpath. • The Richmond CVS raises the description ignores Castelnau is an area of relative deprivation with extreme affluence neighbouring poor, with research on residents facing isolation and that they value community provision. (<i>see general comment on Place-based strategies which raise the need for an accurate and</i> 	<ul style="list-style-type: none"> • Added reference to partnership working with Barnes Common Ltd and WWT in 'Other Initiatives' and 'Other policy initiatives' sections • Added reference to community isolation and deprivation in the vision. • Added reference to opportunities for improved wayfinding from the station and opening up the riverside for sport and recreational activities. • Added cross-reference to Policy 8 in respect of the tidal flood defences and to ensure any proposals do not encroach on the river. • It is not considered necessary to add further details of all local specific projects, as these can come forward outside of the Local Plan, subject to funding. • A number of comments related to specific transport issues and are addressed in transport policies, or are beyond the remit of the Local Plan, and therefore no further changes were considered necessary.
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<p><i>balanced profile of each area with expectations for investment and improvement of existing infrastructure).</i></p>	
<p>Responding to the climate emergency and taking action</p>	
<ul style="list-style-type: none"> • A number of respondents supported the emphasis given to climate change and pollution, including organisations, statutory consultees and individuals. • A comment supporting putting climate change at the heart of decision making, but would prefer stronger requirements about the circular economy and worry whether it is sufficient robust to put into practice. • Richmond Charities comment that fuel poverty is a key issue for elderly residents, and they undertook a large scale energy audit in 2019 which identified installation of PV panels as the most appropriate renewable energy source for their almshouses. However the Council has refused permission to install on the majority of their estates, and the policy needs to enable renewable energy sources to be installed on listed buildings and in Conservation Areas, and shift towards the climate emergency. • Royal Botanic Gardens Kew comment that Policies 3 to 7 largely align with their own sustainability initiatives and commitments, but seek a number of clarifications and observations. Their overarching aim is becoming Climate Positive by 2030, which involves an extensive range of site wide initiatives. These will not always be delivered alongside other developments, may be stand-alone, or measures may bridge several projects. The related benefits may not be captured on individual planning applications, so it will not always be feasible for net zero carbon to be achieved for individual developments, and seek a degree of flexibility to consider the wider picture, as well as recognising the complexities around retrofitting sensitive heritage assets as in Policy 29.F. • Historic England is committed to achieving net zero and to meet the Government target of being carbon neutral by 2050 we must adapt our historic buildings. Optimising embodied carbon by reuse, maintenance and retrofit of existing buildings is essential, as is avoiding maladaptation. Suggest it would be helpful if the Plan provided further details on how climate change measures can be applied to historic buildings e.g. encourage a fabric first approach. They provide details and further links to their guidance and research covering both mitigation and adaptation, including utilising modelled life cycle assessments 	<ul style="list-style-type: none"> • The Council have placed climate change at the centre of the Local Plan and with the Net Zero Carbon Study, aim to reduce the amount of on-site carbon emissions significantly. • The Council has established high ambitious targets for reducing the effects of climate change but intends to achieve this while conserving Richmond’s historic environment. A balanced approach to these two objectives will be struck through the development management process. • Policy 4.E.1 does set out that ‘off-site provision instead of a cash-in-lieu contribution is only acceptable if an alternative proposal is identified, delivery of that proposal is certain and subject to agreement by the Council’, which is considered sufficiently flexible for circumstances such as those Royal Botanic Gardens Kew have described.

<p>and finding locally based solutions. Support the emphasis on the circular economy and reuse which reflects the London Plan and supports retention of historic buildings as well as existing materials. Suggest it would be helpful to refer to the risks of maladaptation and areabased solutions, alongside planning for retrofit on a building by building basis.</p> <ul style="list-style-type: none"> • A comment that biomass boilers should be banned, should only be electric or heat source low carbon energy. 	
Policy 3. Tackling the climate emergency (Strategic Policy)	
<ul style="list-style-type: none"> • A comment could mention development plans for centrally sponsored decentralised energy networks using heat exchanges from under sports pitches/open spaces. A comment B.7 could include minimising run-off and promoting soakaways, also aquifer use. • Habitats & Heritage comment on 3.A it will be necessary to move towards net-zero more quickly; planning control over new development is one of the main levels the local authority has to reduce CO2 from buildings, whereas other areas the Council has less control. Support 3.B, 3.D and paragraph 16.6 acknowledging need to increase energy efficiency of existing building stock; research demonstrates problems and existing programmes are reaching only a tiny proportion of properties, and would like to see discussion whether Council can advance this policy using planning powers and what national changes are needed. • EA comment add to B.7 reference to maintaining flood storage and increasing it where possible, to manage flood risk as part of tackling the climate emergency. Even small losses can cumulatively have a large impact, and the NPPF requires no increase in flood risk elsewhere. B.7 could refer to an integrated approach to water management. • EA comment the link between biodiversity and climate crises is expanded upon in this policy. • The CCG support the policy, noting the NHS is committed to reaching net zero carbon by 2040 and moving towards a sustainable model of healthcare. 	<ul style="list-style-type: none"> • Amend the policy to require net-zero to be achieved by 2043, <u>at the latest</u>. The Local Plan's policies are very ambitious. • The requirements for Decentralised Energy Networks and minimising run off and soakaways are adequately captured in Policy 5 and Policy 8 respectively. • Solar panels are already captured in Permitted Development right unless they are subject to Article 4 Directions or within a Conservation Area. References to specific technologies are captured in para 16.13 of the draft Local Plan. In addition to the Plan policies, the Council has committed to producing additional planning guidance to ensure where planning consent is required an optimum balance can be struck between the need to reduce carbon emissions and preserving the borough's historic buildings and their setting. • The Local Plan has set out requirements for developments involving refurbishment in Policy 4 Minimising Greenhouse gas emissions and promoting energy efficiency (Strategic Policy). It is not considered they need to be repeated here. • It is agreed that the policy could be amended as the Environment Agency have suggested with regards flood storage. The Local Plan is to be read as a whole and Policy 39 Biodiversity and Geodiversity is considered sufficient along with the existing reference in Policy 3 to the importance of biodiversity in tackling climate change. Richmond Council have declared a climate emergency and intend to address the effects of climate change through a variety of methods.
Policy 4. Minimising Greenhouse gas emissions and promoting energy efficiency (Strategic Policy)	
<ul style="list-style-type: none"> • A comment that Reselton Properties fully support measures to minimise greenhouse gases and promote energy efficiently, however collectively with the 	<ul style="list-style-type: none"> • The carbon offset amount has been assessed as part of the Net Zero Carbon Study as well as the Whole Plan Viability Assessment, and it is considered to be

Mayor's off set payment, the proposed carbon offset would equate to a payment nearly 4 times the current value. While technology is still evolving and payment more likely to be required initially, may render many schemes unviable, particularly where ambition to meet other priorities such as affordable housing. Suggest should be discretion in the policy to allow payment to be directed to other priorities.

- A comment part B.2 could include DENs using heat from ground source and borehole source heat exchangers.
- The HBF comment on the London Plan approach and that the Council justifies its departure due the cumulatively large number of small sites is a specious argument. The contribution to carbon emissions from new development is negligible compared to the existing housing stock which is highly energy efficient and protected by Conservation Areas which prevents their gradual replacement. New homes on minor developments will have to be built to the higher energy efficiency requirements of the new Part L that comes into force from June this year. Consider the Council's approach is disproportionate when there is a need to encourage a higher supply of housing from small sites, as a strategic priority in the London Plan.
- Royal Botanic Gardens Kew seeking clarification on whether the non-residential development of over 500sqm includes conversions and refurbishments (for listed buildings) or is only applicable to new build floorspace; view is generally more applicable and deliverable in relation to new build development. Part E stipulates a blanket rate for cash-in-lieu offset contributions and does not provide any flexibility or exemption for charities and cultural institutions. RBGK applies its own rigorous site-wide sustainability targets and it is not always able to be reflected in individual planning applications. Highlight a slight conflict part D requires non-residential development of 500sqm or more to achieve net-zero carbon with a minimum of 60% on-site reduction; Table 16.1 specifies 50% and clarification is sought.
- The Mayor of London welcome the elevation of the importance of tackling climate change. The Mayor has set an ambition aim for London to be a zero carbon city by 2030 and you may want to reflect this. With regard the ambitious targets that seek a higher level of on-site carbon reduction and a higher offset

viable. Any payments resulting from a development should be directed to their appropriate causes and are not transferable.

- Decentralised Energy Networks are captured in Policy 5.
- The Council encourages upgrading of the existing housing stock as well as setting a high bar for new developments, changes of use and refurbishments where applicable.
- The Net Zero Carbon Study has shown that the standards established for small sites are achievable, and that the requirements have been tested as being viable as part of the Whole Plan Viability Assessment.
- The Council encourages the development of small sites and sustainable development meeting both goals from the London Plan.
- The Council explained that the supporting evidence had been provided and that the wording to the supporting text would be changed.
- BREEAM targets have been included in Policy 6 relating to Sustainable Construction Standards.
- Further to the Council's own monitoring of compliance with the Sustainable Construction Checklist and on the advice of the Council's sustainability consultants, the threshold requirement for on-site carbon emission reductions has been reduced from 500sqm to 100sqm for non-residential development. This means that all non-residential developments of 100sqm and more need to comply with the specific requirements.

rate compared with London Plan Policy SI2, it will be important to ensure these are deliverable and that housing targets and other Plan requirements can be achieved, and reviewed once the Whole Plan Viability Assessment has been produced. Paragraph 16.8 should read 'at least five years' rather than over a period of 4 years, as per the Mayor's BeSeen energy monitoring guidance.

- A comment welcome the aspirations, but London Square Developments query the need to meet burdensome policy requirements over and above London Plan policy without evidence-based justification. The minimum of 60% on-site carbon reduction for new build development is considerably higher than London Plan Policy SI2, it is not clear why nor has there been a review as to the realities of sites being able to deliver this target. The Government plans to bring in a more gradual approach (Future Homes Standard and interim Part L in 2022) which is more sensitive to the abilities of the industry to adapt and deliver these increasingly demanding targets and is based upon detailed studies and extensive consultation. There is no evidence-based reasoning as to how they carbon offset figure has been arrived at nor the appropriateness of it. A significant increase in carbon offset price will fail to encourage on-site reductions and be prohibitive to the redevelopment of sites as a whole, including on-site affordable housing. Query if the Council have liaised with the GLA regarding the updated figure to ensure alignment. The London Plan targets do not jeopardise the strategic aims for London; the burdensome nature of the policies without justification would significantly affect the deliverability of residential schemes, including the viability of small housing sites, impeding the Council from meeting borough housing targets and deliverability of affordable homes.
- The CCG support the policy. It is recognised delivering a net zero health service will require work to ensure new healthcare buildings are net zero compatible, as well as improvements to the existing estate. For the redevelopment of NHS sites the London Plan Policy SI2 requirement for major development to be net zero carbon can add significant costs. New health estate projects and major refurbishment projects area assessed by BREEAM and note the London Plan paragraph 9.2.7 states can be bused to demonstrate energy efficiency targets have been met and are encouraged in Local Plans.

<ul style="list-style-type: none"> • A comment the Policy is not in accordance with national policy, not in general conformity with the London Plan, nor justified. There is no evidence base for the carbon offset price, which should include an assessment of the carbon offsetting measures possible in the LPA and divide the average cost per tonne per year of these measures by the expected shortfall in emissions from the anticipated development coming forward over the next 30 years. St George Plc and Marks & Spencer set out as a worked example on a development of 20,000sqm it is estimated it would be an additional £1m which will greatly affect a development's viability. Policy 4 is based on a baseline of Part L 2013 emissions which will become superseded by Part L 2021 and under the Future Homes Standard will go further to effectively surpass the 60% target for major developments, but allows for a gradual transitional period for the construction industry to adjust. The GLA are due to release a revised Energy Assessment Guidance 2022 to address the improved carbon reduction target and how this should be assessed. National policy and London Plan encourage maximising renewable provision, including solar PV, but do not set specific targets, recognising site and roof space constraints, and allows greater design flexibility; the target of 40% of the building footprint area should be dropped. Suggest the Policy should reflect the London Plan. • <i>Virtual event feedback:</i> Participants also expressed desire that new homes had very high energy efficiency standards, and those developers were held to account on this. 	
Policy 5. Energy Infrastructure (Strategic Policy)	
<ul style="list-style-type: none"> • A comment that where networks do not exist part B should require developments to contribute significantly to any future network within 5 years or by 2030. • A comment seeking clarification on whether the non-residential development of over 500sqm includes conversions and refurbishments (for listed buildings) or is only applicable to new build floorspace is raised against Policies 4, 5 and 6 (<i>see also comment on Policy 4</i>). 	<ul style="list-style-type: none"> • The Council has made several amendments to confirm that development of 500sqm or more of non-residential floorspace does include conversions, refurbishments, and major developments. • The policy includes a sufficient amount of flexibility which does allow for off-site provision instead of a cash-in-lieu contribution.
Policy 6. Sustainable construction standards	
<ul style="list-style-type: none"> • A couple of comments on behalf of developers raise concern about the high standards required by the policy. 	<ul style="list-style-type: none"> • Following the completion of the Council's Net Zero Carbon Study, BREEAM requirements have been amended in the policy to require evidence if a

- A comment that water stressed does not square with the observation that water levels under London are rising and this aquifer must be a water resource; the requirement for high standards of water efficiency in new developments should remain.
- The HBF comment that the requirements that go further than the London Plan and national Building Regulations are a disproportionate position and places a significant barrier to smaller developers. Advise the Council not to make additional policy in this area and adhere to the London Plan and any new requirements via Building Regulations.
- A comment that the policy standards are unduly onerous and costly, and the rigid application (as worded) will deter SMEs from locating to the borough (due to high fit out costs) and become unviable to deliver new commercial schemes. A BREEAM 'outstanding' rating for commercial elements will have a negative impact on economic growth and job creation, and it is an unusual requirement with the BRE defining as appropriate for an innovator building. It is more appropriate to target an 'excellent' rating. Achieving a BREEAM rating over and above the London Plan requirements has not been justified by the Council's evidence base.
- A comment suggesting wording to encourage prefabrication/modular construction to speed up construction and reduce pollution and disruption, as tend to be more energy efficient. Modular construction is common and appropriate, with examples from elsewhere.
- A comment that the policy is not in accordance with national policy or general conformity with the London Plan, nor justified. Deviation on BREEAM and Home Quality Mark standard. Policy does not take into consideration practical implications to 'shell only' and 'shell and core'. BREEAM 'outstanding' is a considerable uplift, which requires assessor input prior to consultant appointments. The London Plan targets BREEAM minimum performance for selected key credit criteria, such as energy and water, and surpasses BREEAM outstanding for other key areas, such as reduction in carbon emissions and prediction of operational energy performance, and reduction of demolition and construction waste. Recommend the London Plan policies be targeted which cover the key BREEAM credits. The Fabric Energy Efficiency Standards should be

- development is unable to achieve the Outstanding rating. The threshold for BREEAM non-domestic new construction has been increased from 100sqm to 500sqm following the findings of the Study.
- The Council does encourage the use of modular construction in paragraph 17.40 but the suggested change would be too limiting and effectively make modular construction the default.
 - The supporting text has been amended to clarify that the final ratings for BREEAM need to be applied to shell and core or core only developments.
 - Thames Water's comments were agreed with and the supporting text changed accordingly.
 - The Council considers BREEAM to be the preferred construction standard and will enable more sustainable developments to come forward in the borough.
 - Further to the Council's own monitoring of compliance with the Sustainable Construction Checklist and on the advice of the Council's sustainability consultants, the threshold requirement with regards to fabric efficiency standards has been reduced from 500sqm to 100sqm. This means that all non-residential developments of 100sqm and more need to comply with the specific requirements.
 - A summary table was added to the end of the policy including all the climate change requirements of different developments.

<p>based on Building Regulation compliance in accordance with Part L and the Future Homes Standard.</p> <ul style="list-style-type: none"> • Thames Water refer to the Environment Agency’s designation of the Thames Water region to be “seriously water stressed” and support the mains water consumption target of 110 litres per head per day as set out in national planning guidance, which should be applied through a planning condition for all new residential development. • A comment relying on BREEAM and not Passivhaus. A comment that many town centres are under stress without proper infrastructure e.g. drains, street lighting, refuse management. • A comment seeking clarification on whether the non-residential development of over 500sqm includes conversions and refurbishments (for listed buildings) or is only applicable to new build floorspace is raised against Policies 4, 5 and 6 (see also comment on Policy 4). 	
Policy 7. Waste and the circular economy (Strategic Policy)	
<ul style="list-style-type: none"> • The Richmond CVS comment that while food waste from retailers is used for community benefits it involves multiple vehicle journeys around the borough; reference surplus waste in plans for infrastructure. • The Mayor of London welcomes the policy reference for Whole Life-Cycle Carbon Assessments and the Mayor’s guidance should be referenced within the supporting text. • On waste, the Mayor of London sets out that the London Plan requires boroughs to allocate sufficient land and identify waste management facilities to meet apportioned tonnages of waste, or any pooled arrangements. Welcome the safeguarding of existing waste sites and noting the West London Waste Plan/London Plan policies will be used to assess proposals. Noting the Waste Plan is due for review it should be made clear the waste apportionment over the lifetime of the Plan will be accounted for. • EA comment on A.3 should include a requirement for a Construction Environment Management Plan for all development using the river to transport construction materials and waste to ensure the river will be protected. • EA comment generally that waste management activities can cause pollution and emissions, and waste planning has a role to play in prevention, making sure 	<ul style="list-style-type: none"> • The Council recognises that the West London Waste Plan was adopted in 2015, however the London Plan (2021) also states that waste sites should be safeguarded. This policy position would also apply to Arlington Works. • Added a requirement for a Construction Environmental Management Plan to be required for all development using the river to transport construction materials and waste. • Added clarification that the policies of the West London Waste Plan will apply over the lifetime of the Local Plan. • It is not considered relevant to add a reference in the Local Plan to infrastructure for distributing surplus food waste.

<p>waste facilities are located and designed to minimise their impact, including for further afield hazardous and specialist waste streams.</p> <ul style="list-style-type: none"> • Sharpe Refinery Service Ltd comment on Arlington Works (landowner) that the policy approach does not meet the requirements of NPPF section 3 and has failed to consider the site could deliver homes/commercial floorspace. Part B is based on out of date evidence base, and should refer to a referenced version of the London Plan. Policy will continue to safeguard a disused waste site which is in conflict with London Plan policy GG2. 	
Policy 8. Flood risk and sustainable drainage (Strategic Policy)	
<ul style="list-style-type: none"> • A comment that the place-based strategies demonstrate the importance of the river and the River Thames Society is supportive of the overall principles and policies proposed, but the details on particular planning application details can be more problematic. Hope planners to insist on exceptionality for any built development in MOL (including over Thames water space) or within 16 metres of the bank of the tidal river. • A comment urging include a policy stating flood risk areas are protected from storm surges and rising sea levels. Suggest a paragraph for the opening text on these risks, a Zone 0 should be added with the same parameters as Zone 1 to take account of extreme storm surge flooding, and a Sustainable drainage reference should be 2 l/s per sqm runoff rate. • Habitats & Heritage suggests a reference to the Thames Landscape Strategy including its work on flooding via the Rewilding Arcadia project. • Thames Water comments that waster and/or sewerage infrastructure may be required to be developed in flood risk areas, and existing works will need to be upgraded or extended to provide the increase in treatment capacity to service new development. Flood risk policies should reference 'sewer flooding' and that it is the responsibility of the developer to make proper provision for surface water drainage to ground, water courses or surface water sewer, to reduce the quantity of surface water entering the sewage system to maximise the capacity for foul sewage to reduce the risk of sewer flooding. • The Environment Agency comments on their general remit as a statutory consultee and welcome the ambition to go above and beyond national policy, although urges to consider the practical implications. Recommend the Plan 	<ul style="list-style-type: none"> • Comment noted in relation to place-based strategies. • Storm surges do not need to be specifically referred to in the policy as this is taken into account in the TE2100 Plan and climate change allowances. Flood zone definitions need to be in line with national guidance, therefore, a Zone 0 cannot be introduced. • Reference to the Thames Landscape Strategy has been included. • Thames Water's comments are already reflected in the relevant Local Plan policies. • The Environment Agency's recommendations have been taken on board as follows: <ul style="list-style-type: none"> - Inclusion of requirement for sequential approach on specific sites. - Clarifications regarding the role of the LLFA and EA. - Inclusion of additional wording in relation to flood risk mitigation and resilience, including additional paragraphs in the supporting text, to reflect specific requirements for finished floor levels as well as flood storage. - Separately refer to fluvial and surface water flood risks in part D. - Minor amendments to flood storage requirements. - Clarification on functional floodplain and making the policy clearer as to what would be required if redevelopment is proposed. - Clarifications have been made in relation to parts I and J and supporting text around 'set backs'. - Clarifications in relation to basements.

strongly emphasises connection between tackling climate change and flood risk management.

- The Environment Agency comments part A should differentiate between national policy and guidance such as the SFRA, and recommends the sequential approach is required to the layout of sites.
- The Environment Agency recommends clarifying reference to the EA and LLFA in part B.
- The Environment Agency recommends specifying finished floor level requirements for developments in the fluvial and defended tidal wording in part B.
- The Environment Agency recommends that fluvial and undefended tidal flood storage compensation is referenced in part B as well as surface water compensation.
- The Environment Agency recommends separating the surface water and fluvial flood risk requirements in part D.
- The Environment Agency comments that the requirement for floodplain compensation in part D should be clarified as it is not just an ask from the Environment Agency.
- The Environment Agency comments the requirement for providing additional flood storage in part D should be strengthened.
- The Environment Agency comments in part E to update the wording to clarify what is meant by no intensification of the land use in Zone 3b.
- The Environment Agency welcomes references to the TE2100 Plan and the future defence maintenance, replacement and raising requirements, and suggest amends to parts I and J and the supporting text. Clarify some instances a greater set back may be required. Remove the reference to 'where possible'. Include a policy to ensure no new active flood defences will be permitted, and require any developments coming forward that currently use active flood defences to replace them with permanent flood defences to achieve betterment through re-development. Refer to the flood defence owner's responsibility for maintaining flood defence structures. Update to mandate flood defence raisings to the statutory 2065 flood level for developments adjoining the tidal Thames statutory flood defences.

- Change from 'upper end' to 'central' climate change allowance requirement.
- Reference to the requirements for an Environment Agency Flood Risk Activity Permit (FRAP) have been included.

Note that no changes have been made to the application of the Sequential Test and the local approach.

- The Environment Agency recommends include in part J promotion of the Riverside Strategy Approach for the benefits to flood risk, placemaking and biodiversity.
- The Environment Agency suggests to add reference to the multiple benefits that flood defence work can achieve to paragraph 16.75.
- The Environment Agency comments the requirements for basements are stronger than their position across the tidal Thames on bedrooms at basement level, but do not suggest a change.
- The Environment Agency comments on the climate change allowances for fluvial flood risk, as while commendable using the upper end allowance is not in line with national guidance. The EA would review Flood Risk Assessments against the national guidance and maintain consistency. Urge to consider the practical implications, and highlight may cause further contradictions with setting finished floor levels to the current required heights.
- The Environment Agency comments on the national guidance relating to the Sequential Test, as not requiring the Sequential Test (subject to certain criteria for the 800m buffer zone around town and local centres) will restrict the ability to move development to lower risk flood zones. If the local Sequential Test is taken forward, consider the impacts and advocate minimising the buffer zone.
- The Environment Agency comments there is no reference to the requirements for an Environment Agency Flood Risk Activity Permit (FRAP) which may be required.
- The Environment Agency comments that sustainable drainage (SuDS) should incorporate above ground features with outfalls that have minimal impact on the receiving watercourse. Should be an emphasis on working with natural processes to reduce flood risk, such as soft engineering to bank protection works, and the requirement for river buffer zones should acknowledge the multiple benefits of undeveloped river buffer zones (*see also comment on Policy 40*).
- The Environment Agency comments flood risk management requirements can deliver multiple benefits. Support cross-referencing between policy areas and recommend enhancing the emphasis on the multiple benefits for flood risk, biodiversity, access to the river and public realm for example.

<ul style="list-style-type: none"> • The Environment Agency comments on the islands and seek clarification in paragraph 16.63 on what the Council considers to be in the functional floodplain for example even structures that are elevated above the 1 in 20 modelled flood level. • A comment that certain areas of the borough might be better to allow flooding to defend other areas. • A comment on the number of Thames islands included within the borough, and those claimed by other authorities. Clarity helpful in the Plan on how the EA's general rules limiting development within 8/16 metres apply, noting all the islands have existing build development closer. 	
Policy 9. Water resources and infrastructure (Strategic Policy)	
<ul style="list-style-type: none"> • FORCE would prefer C.1 to encourage improvement where rivers have been classified by the EA as failing to meet 'good' status as the target standard for the Water Framework Directive (WFD). Minimising misconnections between foul and surface water networks will be dependent on effective inspection and sanctions regimes by the Council. Support adherence to the WFD that 'good status' or 'good ecological potential' should be achieved by 2027. Consider impacts on Combined Sewage Outfalls when considering applications for developments which will increase demand for water services, as these contribute to sewage pollution. • The HBF set out the legal duty on companies providing water supply and wastewater services. It is contrary to the national approach to place the onus on the developer to demonstrate capacity, as the provider of water services should invest to meet planned requirements. The housebuilding industry already provide resources to water companies, and there is no need for policy to stipulate further payments to water companies to allow new residential development to connect. • Thames Water refer to national guidance which states Local Plan should be the focus for ensuring that investment plans of water and sewerage/wastewater companies align with development needs. Support the section on Water and Sewage Infrastructure in the Policy. Authorities should also consider the requirements of the utilities for land to enable them to meet the demands that will be placed on them, noting it is not possible to identify all the water and 	<ul style="list-style-type: none"> • A minor amendment is proposed to Policy 9 C.1: "protect the water quality of rivers and groundwater; where rivers have been classified by the Environment Agency as having 'poor' failing to meet 'good' status, any development affecting such rivers is encouraged to improve the water quality in these areas." • Some amendments are proposed in response to the HBF, including clarifying that developers need to provide information that shows there is adequate supply and capacity (this is to reflect that it's not the applicant's responsibility to ensure this; additional text has been added to the supporting text to clarify that water companies are responsible for ensuring that water supply, drainage and wastewater infrastructure is in place in advance of new development coming forward. • Thames Water's comments have been addressed by referring to the fact that any adverse land use or environmental impacts are minimised as far as possible. The other points raised by Thames Water do not necessitate any further changes. • A number of changes are proposed as a result of the Environment Agency's (EA) response, although Policy 6 already deals with water efficiency standards and the fact that the borough is in a water stressed area, therefore, these will not be repeated within policy 9 as well. • The EA's suggested advice note on riverbank protection goes beyond the scope of this Local Plan.

<p>wastewater/sewerage infrastructure over the plan period as water companies are regulated in 5 year periods. Suggest a change to part B to reference any adverse land use or environmental impact is minimised as far as possible.</p> <ul style="list-style-type: none"> • The Environment Agency raise the Plan should recognise the borough has been classified as an area of serious water stress and there is limited water resource availability, along with demand and supply issues set out in Water Companies Water Resource Management Plans. The classification should be mentioned in the Plan, and consider the capacity and quality of water supply systems and any impact development may have, including considering cross-boundary working and the impact of a changing climate. Encourage the Council to ensure the Plan and major developments identify and plan for the required levels of water efficiency and water supply infrastructure to support growth, the IDP can help. Support the use of water efficiency measures, where the area is designated Water Stressed seek the tighter Building Regulations optional requirement of 110 l/p/d. In addition, the EA's assessment of water availability and the impacts of existing abstraction on the aquatic environment in the area shows most of the catchments in the South East are heavily abstracted with unsustainable abstractions occurring to the detriment of the environment. Note it is a useful exercise to carry out a water cycle study to inform policy requirements. • The Environment Agency seek mention of how the WFD Waterbodies could achieve good ecological status/potential and encourage the Council to produce supplementary advice for developers undertaking bank protection works, as they seek to restore and enhance watercourses to a more natural channel wherever possible. • The Environment Agency note other policies will be relevant to Water Quality, and would like to see requirements for construction sites to include strict adherence to the regulatory position statements regarding dewatering. Construction method statements should include details of how silt/site run-off will be managed and note whether any site activity requires a Flood Risk Activity Permit. 	<ul style="list-style-type: none"> • Further changes are proposed to Policy 53 in relation to Construction Management Plans and necessary requirements to ensure that surface and ground water is not polluted as a result of a development, particularly its construction.
Delivering new homes and an affordable borough for all	
<ul style="list-style-type: none"> • A comment that the Town & Country Planning Association states 20 minute neighbourhoods without adequate social housing is just gentrification. 	<ul style="list-style-type: none"> • Add reference to refer to Living Locally in Policy 11.

Richmond has delivered the lowest level of housing in London in recent years – and the outlook is the same. The existing housing associations have a limited ability to build more housing. If there is to be a step-change the Council would have to attract new housing associations or start building Council housing. Housing associations charge higher rents than equivalent council house on average. Do not understand why Richmond is so reluctant to help neediest members of society, by not focusing on housing delivery that results in the lowest rents. Lack of social housing means new tenants no longer have lifetime tenancies and therefore have much less security.

- Spelthorne Borough Council recognise housing is a strategic and cross-boundary issue, and acknowledge boroughs face similar constraints. Support the plans to meet the London Plan housing target, however every effort should be made to address housing needs in the wider Greater London area. While the Mayor of London is responsible for the overall distribution of housing need in London, recognise there remains a notable amount of unmet need in the Greater London area therefore further work should be undertaken to review the implications associated with this and to identify further capacity options to ensure this is met within Greater London. Support emphasis on higher density development and smaller units, but could have implications for Surrey, since previous under-delivery in London and lack of affordable family units has added to housing pressures in Surrey districts / boroughs with associated implications for infrastructure.
- Elmbridge Borough Council recognise the difficulties in delivering sustainable growth and balancing competing environmental, social and economic pressures. Note the London Plan target and Policy 10 states the borough will exceed the minimum, and note the top end of the approximate number of units to be delivered in the broad areas equates to 4,800 dwellings and the details are set out in the Housing AMR; however for transparency it would be useful if each of the allocations set out the indicative number of units. If approach to meeting housing need changes wish to further discuss. Elmbridge is pursuing a Local Plan strategy that will not meet the local housing need figure (as set by the Standard Methodology); as indicated could potentially exceed the London

- It is considered the Plan already sets an ambitious affordable housing target and allows for a mix of unit sizes.
- The Council is unable to assist in meeting any unmet housing need from other boroughs, but Duty to Cooperate discussions continue.

<p>Plan target circ. 700 homes across 10 year period, grateful if could confirm if the position on meeting any of Elmbridge’s unmet need has changed.</p>	
<p>Policy 10. New Housing (Strategic Policy)</p>	
<ul style="list-style-type: none"> • A comment note the housing target for Barnes, Mortlake and East Sheen has increased; see as being substantially met from the Brewery and Barnes Hospital redevelopments and any increase beyond this will put significant strain on physical and social infrastructure which is already at breaking point. • The Royal Parks note the number of homes to be delivered within close proximity to Richmond Park (around 1,200) and Bushy Park (around 1,000). This would result in intensification of visitors to the Parks. Capturing some of the value of those developments, through S 106 or CIL payments, would seem appropriate to help The Royal Parks ensure the Parks can continue to cope with the resultant increase in visitor numbers and their increasing importance as open green space for borough residents. • The HBF raise whether the London Plan target is the right figure to base the plan upon is arguable in view of the now apparent strategic shortfall in planned housing provision across London as a whole as well as the more local evidence of need in the LHNA. Housing delivery across London as a whole is failing to keep up with the requirements of the new London Plan; the Council could do more to make a greater contribution towards addressing the wider-housing shortfall. Land supply is tight. The Council should consider the OOLTI sites assessed that perform weakly for release as housing and rethink its approach to development on back garden land which is generally too restrictive. The Plan contains few large site allocations for housing and the indicative ranges (upper and lower) represent a very slender housing land supply; it is unclear how the site allocations relates to this table but appears relying on windfall homes from these broad areas and many site allocations are expected to provide affordable homes only. National policy expects authorities to identify and allocate sites for small developments equivalent to 10% of overall housing supply, also encouraged by London Plan Policy H2; some allocations are on small sites but unclear and it would be helpful to identify and allocate more small sites to assist in delivery. Recommend rethink approach to retaining so much OOLTI, as unjustified given the documented housing problems – 3 sites perform weakly, 	<ul style="list-style-type: none"> • Clarify in the policy the target is for net housing completions. • Update the policy and supporting text to reference the context of the latest Housing AMR 2021/22. • Add to the supporting text clarification on rolling forward the London Plan housing target beyond the ten year London Plan target. • Add the housing trajectory from the Housing AMR 2021/22 to the supporting text. • Clarify the cross-reference to employment policies to assess if there is potential to housing gain on employment land. • Clarify in the supporting text to Policies 2 and 11 the London Plan housing target is based on capacity, whereas the LHNA affordable housing needs are unconstrained figures calculated to inform the policy approach to affordable housing.

and York House car park offers potential for housing, and Harlequins site has potential. New Government policy as well as the London Plan is keen to tap back gardens and suburban areas as potential sources of land supply; London Plan Policy H2.B.1 is in contrast to Policy 15.B which is very restrictive and includes many conditions to make it virtually impossible to build on back gardens, neutralising the Government objective of gentle densification; stipulating no identified harm is general and vague and there is no justification for this. Recognise the political sensitivity surrounding the development of back gardens but the Council should avoid erecting unnecessary barriers.

- A comment in line with London Plan Policy H1 the target is expected to be achieved through optimising housing delivery on all suitable, deliverable and available brownfield sites. It is therefore supported that, on the basis that community uses is not delivered in full or part across a site, that residential accommodation could be a suitable alternative use on the Barnes Hospital site (suggested by South West London and St George's Mental Health NHS Trust) and should be reflected in the policy.
- A comment support the statement to exceed the minimum 10 year housing requirement. The policy would benefit from a clear reference to number of homes being a net target. Important for Ham Close (suggested by RHP).
- The Mayor of London welcomes the commitment to exceed the borough's 10 year London Plan target of 4,110 homes through the optimisation of all suitable and available brownfield sites and are pleased to note delivery against the target is capable of being met without the release of employment land. Note confirmation the target can be rolled forward for future years; this will need to be carried out in accordance with London Plan paragraph 4.1.11.
- A comment support the statement to exceed the minimum 10 year housing requirement. The policy would benefit from a clear reference to number of homes being a net target. Important for Ham Close (suggested by Hill Residential). Consider the housing target too low for Ham & Petersham (examples provided) and should be changed to 300-350 homes.
- A comment support the delivery of the minimum target and the new homes proposed within Twickenham, noting appears to be inadequate number of draft site allocations for housing within sustainable locations to achieve this. The

AMR 2019/20 shows delivery in 2019/20 331 homes were delivered below the 410 target set by the London Plan, and a shortfall against the LHNA (affordable homes per annum). Encourage the Council to increase the number of draft site allocations for housing including the Greggs Bakery site (by London Square Developments), to reduce the reliance on small housing sites that result in few affordable new homes and can become unviable. The supporting text that states the borough target is capable of being met without release of employment land is not demonstrated by the latest AMR and should be removed.

- A comment to be consistent with national policy the housing requirement should cover the whole Plan period; the target set by London Plan Policy H1 is projected forward to cover full 15 years and amended to plan for a target of 6,165 homes. The reference to exceed the minimum strategic dwelling requirement should not be qualified with the reference to other Local Plan policies as it is unnecessary and over cautious; the policy should adopt a more positive and ambitious approach to significantly boosting housing supply and optimising sites on the basis of the supply of deliverable/developable sites. A housing trajectory should be included in the Plan. Recommend amend the Site Allocations expected implementation timescales to years 1-5, 6-10, and 11-15 to be consistent with national policy. The use of wards is inconsistent with the place-based approach in the Plan, and cannot be read/applied effectively. The indicative ranges are vague and do not commit to delivering the London Plan minimum housing target; recommend the futures stated should be 'targets' and amended to tally with the 10-year housing target and where possible the 15-year period. No explanation is provided how the amounts for each location have been calculated and our review suggests they may be under-ambitious and too low (examples provided) (offer by St George Plc and Marks & Spencer to prepare the evidence to determine the optimum capacity of the Kew Retail Park site).
- A comment the aspiration/target (paragraph 17.7) should not be able to override protected open land and should be consistent with requirements of Conservation Areas, which should be held by present owners as trustees for

<p>future generations. Once gone for short-term needs and perceived needs, they are gone forever.</p> <ul style="list-style-type: none"> • A comment to add wording to paragraph 17.8 to state on employment land there may be potential for enabling housing gain if proposals increase the level of existing floorspace or the existing commercial floorspace is not viable. 	
Policy 11. Affordable Housing (Strategic Policy)	
<ul style="list-style-type: none"> • A comment the Affordable Housing SPD makes reference to the discounted contribution sought from listed buildings subject to conversion from employment to residential; this should be referenced in the supporting text to the policy. • A comment pleased to see the definition. Note the tenure split is different to current; there is no explanation as to why this has changed. • A comment the aims are worthy but the targets appear optimistic. Questions how will be financed if developers find profit margins unattractive, and will the restrictions in Conservation Areas be respected. • A comment that the Regulation 18 Plan is not supported by a Local Plan Viability Assessment limiting scrutiny and the Council should reconsult on the Regulation 18 Plan with the supporting viability assessment. The viability of specialist older persons' housing is more finely balanced than general needs housing, and these typologies should be robustly assessed to accord with the PPG. • TfL Commercial Development raise the Mayor's portfolio approach to delivering 50% affordable housing across public sector landholdings in London, and this flexibility allows for more complex sites to come forward; update the policy to reflect the wording in London Plan Policy H4. • A comment that as not enough affordable housing is being built, every possible option should be explored to ensure affordable homes are provided, including a balanced appropriate to mixed use development while ensuring no-net loss of employment floorspace. A large proportion of future delivery is predicated on small sites which often results in payments of lieu that are far less effective. • A comment viability should be required where schemes do not meet the threshold in the London Plan. 	<ul style="list-style-type: none"> • Add reference to listed buildings to clarify on small sites seek the normal percentage requirement for conversions, even if a change of use from employment to residential. • Add clarification in policy and supporting text seeking evidence of discussions with Registered Providers, and the Council's Affordable Housing Enabling Officers to determine the appropriate housing mix, to inform on-site affordable housing provision. • Add reference to the inclusion of key workers in the Council's latest affordability criteria and priority allocation for Intermediate Housing in the supporting text, and add key worker housing to the Glossary. • It is considered the policy approach reflects the need for ambition, in light of the acute affordable housing crisis, while recognising viability and other policy requirements need to be taken into account on a case by case basis. • The policy is considered appropriate in light of variation to national and regional approaches, given local circumstances, and the Council's evidence base. • References are updated in terms of the Whole Plan Viability Assessment (WPVA) 2023, to recognise site-specific viability, and Local Housing Needs Assessment (LHNA) Updates 2023. • It is not considered necessary to expand on the reference to almshouses, as the benefits of charitable housing can be recognised under Policy 12.

- Mayor of London welcome intention to seek 50%, however the threshold approach is not reflected in the Plan which is likely to constitute a General Conformity Issue. The threshold approach should be reflected in policy, as the borough's approach is not supported by viability evidence or historical delivery rates.
- A comment welcome the tenure split, as a greater proportion of intermediate housing can make a significant difference to viability. Should be flexibility in the policy for different tenure splits where delivering same social rent quantum but allows for a significant increase in overall quantum of affordable housing.
- A comment the policy is contrary to the London Plan threshold approach where they would not be required to provide a viability assessment and would not apply a late stage review. The exceptional circumstances when viability will be accepted should be defined; site specific circumstances should be taken into account through the Viability Tested Route (particularly important to the Greggs Bakery site due to decontamination). Question how the borough intends to deliver the additional affordable housing requirements without the release of employment land given historical under-delivery.
- The CCG note the tenure split and that the London Plan allows for flexibility to explore innovative products. Recognise the shortage of affordable housing is hindering recruitment and retention of public service workers; the NPPF definition includes essential local workers which includes NHS staff. The redevelopment of surplus public sector land and buildings represents an opportunity to delivery homes for essential workers which could be part of the 50% requirement.
- A comment the definition is muddled, including what the Council considers to be 'genuinely' affordable and is not in accordance with NPPF nor in general conformity with the London Plan; the definition should reflect the NPPF and the supporting text should reflect the London Plan on LAR and LSO (the Council's Intermediate Housing Policy Statement is not available therefore it is not possible to assess if it is sound). The 50% policy requirement is not justified by a Whole Plan Viability Assessment to confirm if it is viable and therefore deliverable. It is essential the Whole Plan Viability Assessment accounts for the range of site-specific considerations in the borough. The policy approach has

not delivered the amount or proportion of affordable homes in the borough, and there is evidenced success of the Mayor's threshold approach; there is no justification in deviating from the London Plan and the reference to only accepting viability information in exceptional circumstances is not sound. Discussions with RPs should be done at Plan-making stage. There is no evidence to confirm if the proposed 70/30 split is viable.

- A comment in support of providing social housing at truly 'affordable rents' rather than a percentage of actual private rents. Raises if any scope for Council funding provision through investment constructs such as Model Dwelling Companies.
- A comment the definition should have almshouses added. The Council refuses to accept its affordable housing while at national level the Government hands out grants for almshouse charities.
- The HBF comment the definition excludes First Homes. Give consideration to allowing First Homes to form an element of the affordable housing supply.
- The HBF comment it is contrary to national policy to levy affordable housing contributions from schemes of all sizes. Increasing delivery of SME developers is a strategic priority in the London Plan to increase delivery from small sites. Lift this requirement to make the planning application process easier and help with viability.
- A comment pleased to see almshouses acknowledged. The Richmond Charities are delivering new almshouse developments and are recognised as an affordable housing provider. They would like the requirement for 100% nomination rights on developments of over 10 units reconsidered, as their Trustees must retain the ability to decide who to house in line with the charity's criteria for residency.
- *See comment on Site Allocation 5 Carpark for Sainsburys, Uxbridge Road, Hampton that the allocation for 100% affordable housing is not justified.*
- *See comment on the Place-based Strategy for Teddington & Hampton Wick that affordable housing should not be subsidised and those unable to afford properties should go somewhere where they can afford.*

Policy 12. Housing Needs of Different Groups

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| <ul style="list-style-type: none"> • A comment that Churchill Retirement Living and McCarthy Stone support inclusion of B.4. The need for specialist older persons' housing across Greater London is detailed in the London Plan which requires the borough to provide 155 units per annum. Richmond's AMRs do not monitor the delivery of specialist older persons' housing. The Knight Frank Senior Housing Update 2021 is a useful reference and highlights the target of an additional 4,115 units per year across London up to 2029, however only 3,000 units have been delivered since 2017, with a further 1,600 units under construction/granted which will do little to address the shortfall. In light of the urgent need to significantly increase the delivery of specialist older persons' housing in the borough and across London, it is imperative the planning framework does not impede delivery, and question the requirement to demonstrate local need when the need for specialist older persons' housing is critical and self-evident. • The Mayor of London supports Policy 12 that seeks to assess applications in accordance with London Plan H13, however note the policy refers to identified local need as set out in the Council's LHNA and currently appears to be lower than the London Plan benchmark of 155 units; would welcome further review of this figure to bring it closer in line with the London Plan benchmark. Note the Gypsy & Traveller accommodation research (2016) suggested no demonstrated need for additional pitches, however 10-year pitch requirement needs to be set out once research is updated in 2022 and should take London Plan Policy H14 into account. Welcome reference to the Mayor's future London-wide Gypsy and Traveller accommodation needs assessment. • The CCG welcomes policy which supports the need to provide a wider range of housing options for older people, reducing reliance on residential care homes to enable people to live more independent lives for longer. Should recognise an increase in homes which support people with complex and nursing care needs will support a shift in healthcare 'closer to home' and reduce pressure on hospital services. A concentration of specific types of accommodation e.g. residential care beds can place additional burden on local health and care services. Should also recognise other forms of accommodation e.g. student and shared living will place pressure on local healthcare services/infrastructure and may require developer contributions to mitigate. | <ul style="list-style-type: none"> • Clarify in the supporting text the policy applies to all specialist housing, but this is not an exhaustive list and can come through various development types. Add to glossary definition of conventional homes. • Clarify the net need (for housing for older people and housing with care) identified by the Richmond Housing LIN research. • Add to the supporting text details about current housing priorities. Reference the Richmond Accommodation-Based Care Commissioning Statement 2022. • Add in the supporting text reference to the Council's informal specification guidance for supported housing. • Add reference in the supporting text to the Mayor of London's Practice Note on Wheelchair Accessible and Adaptable Student Accommodation 2022. • The aspirations of St Mary's University for student growth are noted, but it is not considered necessary to update the LHNA. • Update the supporting text with reference to the Council's Gypsy and Traveller Research 2023. |
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- A comment the wording in parts A and B indicate the policy applies to new 'housing' and/or 'accommodation'; neither term is defined and the initial paragraphs of the supporting text implies the policy applies to specialist forms of housing only' - recommend amend policy to make explicitly clear what type of residential development applies to. Part B states a legal agreement will be necessary to control nature of provision, eligibility and affordability for future occupiers; may not be justifiable against CIL Regulation 122(2)/NPPF paragraph 57 and will need to be judged on a case by case basis – recommend text amended to refer to 'may be necessary'. Part B.1 duplicates Policy 11 and is unnecessary - recommend deleted. Part B.2 requires proposals to demonstrate how 'higher' standards of accessible and inclusive design have been met, but not defined and therefore requirement unclear – recommend policy is amended to make it explicitly clear standards required, which would need to accord with NPPF para 35, and reserve right to make further representations at Reg 19 stage.
- Richmond CVS raise the LBRUT Learning Disability Strategy 2015 – 20 identified gaps in service provision for supported living spaces for people with multiple and complex physical and health needs including behaviour that challenges services, and accessible quality accommodation for people with a learning disability and a physical disability, with both children's and adult's services stating intention to provide facilities and accommodation in borough and reduce cost of out of borough placements. The position has not changed, and there is a need to ensure building-based services are fit for purpose and meet future accommodation needs of this cohort, echoed in the AfC SEND Futures Plan and needs added to this section (page 178).
- A comment agree helping older residents to remain in their own homes by making minor adjustments is a good objective, but should also focus on encouraging developers to build accommodation suitable for older/less mobile residents to downsize.
- HBF comment that relying on the small number of homes required to Part M4(2) or M4(3) standards or hoping adaptations will not provide an adequate response to catering for the ageing population. Strongly recommend include the London Plan benchmark figure for the supply of older persons housing (155

<p>units per year from 2017 – 2029), as a figure the Council should endeavour to achieve. Need to clarify what intending in part B.3 of the Policy and take care not to apply to the supply of care home accommodation, which H13 does not encompass, and does not contribute towards the benchmark requirements. HBF does not support the supplementation of the Council’s own assessment of need with the assessment undertaken by the GLA, as London is a single housing market area and the assessment of need is undertaken by the GLA on behalf of all boroughs/development agencies.</p> <ul style="list-style-type: none"> • St Mary’s University comment the LHNA reflects the position regarding provision of student residential accommodation subject to two amends: accommodation projections should reflect on-site capacity increase to 950 units (not 893) and it should be made clear the statement - there is no requirement to increase the overall housing need on the basis of student growth – will not apply if their predicted growth in residential cannot be contained within exiting landholdings. 	
Policy 13. Housing Mix and Standards	
<ul style="list-style-type: none"> • A comment that minimum standards should be set higher, for the people to live in these developments and important for mental and physical health. • A comment from a registered provider supporting the policy requirements for accessible and adaptable homes and wheelchair homes. Sets out the local benefits of making such provision, and directing to further information and resources. • A comment suggesting issues regarding the likely effectiveness of the policy – clarify the standard referred to is the NDSS, clarify winter gardens can be an appropriate form of amenity on constrained sites to overcome issues of noise and air pollution, and clarify private amenity space relates to the London Plan minimum standards and can be accessed from bedrooms. • A comment paragraph 17.53 should refer to listed buildings where housing mix and standards may not be met due to the plan form of the building and the heritage benefits. • CPRE London would like the Council to ensure new housing development or estate regeneration do not leave residents with inadequate green and communal open space. 	<ul style="list-style-type: none"> • Add reference in the supporting text to dual aspect dwellings, to cross-reference to London Plan Policy D6. • Add reference in the supporting text to the Council’s approval of the Inclusive and Accessible Housing Design Guidance, the Council’s specification for supported housing, and to the Government’s announcement to mandate M4 (2) requirement in the Building Regulations as a minimum standard for all new homes. • It is considered that local authorities cannot go beyond the Government’s Nationally Prescribed Space Standards. • It is considered there is flexibility in requirements for provision of external amenity space, and the supporting text makes adequate reference to the London Plan. • It is considered the policy allows for a flexible approach to housing mix and standards, and it is unnecessary to reference the conversion of listed buildings to residential. • It is considered the policy requires an open space assessment to address public open space for future occupants and surrounding local communities.

Policy 14. Loss of Housing	
<ul style="list-style-type: none"> • A comment noting the reference to embodied carbon and the circular economy is sensible. 	<ul style="list-style-type: none"> • Added clarification to the policy on the environmental considerations that are set out in the supporting text. • Added further reference in the policy and supporting text as to the impact of a loss of housing units on supply.
Policy 15. Infill and Backland Development	
<ul style="list-style-type: none"> • The Mayor of London welcome A.2 encouraging redevelopment of car park sites for housing, however there is no need to demonstrate parking is no longer needed in London Plan Policy H1. Reductions in parking can deliver modal shift and this requirement should be deleted. • A comment back garden development is a key issue in the Mortlake & East Sheen Society area, in particular summerhouses becoming office or residential accommodation. The policy needs strengthening and should be separate to backland. • Habitats & Heritage agree garden land protection needs protection as it often forms part of green corridors for protected or endangered species. A case in Hampton Road where trees/shrubbery were removed prior to an application shows the Council needs to lobby for additional powers. 	<ul style="list-style-type: none"> • Amend criterion A.2 to refer to assessment of any net loss in parking in accordance with transport policies. • Update references in the supporting text to the latest London Plan Guidance on ‘Optimising Site Capacity – A Design-Led Approach’ and ‘Small Site Design Codes’. • Add reference to the supporting text to modern methods of construction. • It is not considered appropriate to include a separate section on back garden development, nor refer to garden buildings; the policy is considered to set the appropriate balance for how garden land proposals are assessed. • It is considered other policies cover green corridors; national TPO legislation and guidance is a matter separate to the Local Plan.
Policy 16. Small Sites	
<ul style="list-style-type: none"> • The Royal Parks comment the London Plan priority to increase delivery from small sites is not at the expense of open space; sites could be close to Royal Parks and impact individually or cumulatively, and should be addressed in the policy. • A comment seeking clear policy guidance on the redevelopment of substandard lock-up garages and/or development at the rear of corner sites with access from small roads. • The Mayor of London supports the policy. • <i>Virtual event feedback:</i> In terms of small sites feedback, there was agreement with the principle of encouraging development where there already is development. Given the range of styles and site types with small sites development, it was felt that designs should be judged by individual merit and 	<ul style="list-style-type: none"> • Clarify in the policy the approach to intensification outside the areas identified in part B.2. • Update references in the supporting text including to the latest Housing AMR figures and the London Plan Guidance on ‘Optimising Site Capacity – A Design-Led Approach’ and ‘Small Site Design Codes’. • It is not considered necessary to add further references to different types of small sites, nor the potential impact on existing infrastructure.

<p>that conservation area status may prove a challenge. There was also a wish to see a more joined up approach in terms of small sites development.</p>	
<p>Shaping and supporting our town and local centres as they adapt to changes in the way we shop and respond to the pandemic</p>	
<ul style="list-style-type: none"> • Two comments support attention given to the cultural policies and would like to see Richmond town centre playing a significant role in the Council’s Culture Richmond Plan. 	<ul style="list-style-type: none"> • Noted.
<p>Policy 17: Supporting our centres and promoting culture (Strategic Policy)</p>	
<ul style="list-style-type: none"> • A comment notes East Sheen is designated as a District Centre and the boundaries remain unchanged. A number of shop frontages and other non-residential frontages are outside the secondary frontage limits; these limits need to be better-defined taking into account additional features such as footway widths, landscaping and opportunities for creating gateway treatments. • A question whether shopping, leisure and culture uses is intended to represent Class E. The area at Kew Gardens Station is attracting more coffee shops/cafes and it might be useful to stress that a range or mix/diversification of uses is supported. A question whether the wording includes beauty salons, spa-type uses, and fitness studios which have been increasing in some locations such as Sandycombe Road, Kew and have become successful businesses meeting a community need; suggest such uses should be encouraged and would be more appropriate in the smaller centres. • The Mayor of London note and support the approach to use existing vacant stock to meet the identified need in the Retail and Leisure Needs Assessment 2021. Support approach towards diversifying and repurposing high streets and centres for a wider range of uses and note this will facilitate Living Locally. • A comment part A of the policy should be amended to include reference to major retail and leisure development also being directed to allocations, and amend the supporting text to remove the theoretical assumption all new town centre uses should be accommodated in vacant shop units and re-purposing existing retail floorspace does not mean that there is no requirement to allocate sites for major retail development. The retail hierarchy should define which locations are town centres through an assessment of scale, role, catchment and function, to comply with the NPPF; and the role and function of 	<ul style="list-style-type: none"> • This policy and others in this chapter of the plan have been reviewed and significantly revised. Phase 2 of the RLNS, much more detailed than Phase 1 and including an up-to-date household survey, has informed policy development along with the updating of other key elements of the evidence base. An important outcome of RLNS Phase 2 is that there is no need for further retail Site Allocations. • The Council considers that Parades of Local Importance should remain within the hierarchy. The policy conforms with the requirements of the sequential and impact tests set out in the NPPF. The degree to which a local parade should be considered in terms of the 2 tests would need to reasonably relate to the proposal. • It is proposed to amend the text in relation to a respondent’s suggestion to include reference to an acceptable location for retail being also at a Site Allocation which specifies retail, providing that any requirements of that Site Allocation in terms of scale of retail are met and that the proposal complies with other Local Plan policies. • Local Plan policy would not preclude further gateway treatments at East Sheen. • The need for public toilets is noted.

<p>the various tiers, to assist with the operation of the sequential and impact tests. The evidence base is out of date due to the age of the household survey, or will be due to new Experian economic forecasts in January 2022.</p> <ul style="list-style-type: none"> • A comment as the Phase 2 Retail Study has not been published, the evidence base is out of date and cannot be relied upon. Recommend the matters to be addressed in Phase 2 include the methodology for assessing quantitative retail floorspace capacity and consideration of qualitative needs. Reference that a restriction on the amount of convenience goods floorspace at Kew Retail Park would not be supported by any recommendations in the Phase 1 Retail Study. • A comment the public realm needs public toilets to encourage people to dwell, support that such provision is generally supported and form a part of requirements for new major development. • A comment agree with the Article 4 Direction requiring planning permission for change of use from Class E to residential use. 	
Policy 18. Development in centres	
<ul style="list-style-type: none"> • A comment the intention to create ‘shop-like’ appearances to empty retail premises is papering over the problem; pro-active initiatives to do with ownership, pricing, and Use Class management are warranted. Note Use Class E challenges and opportunities. • RFU comment Part C does not acknowledge the trip generation of visitor attractions such as Twickenham Stadium; suggest amended text. • A comment considering the evidence for retail, non-retail services and leisure floor space, office floor space, and housing floor space, raise concern the character of Richmond Town will be harmed by an imbalance amount and type in the development of floor space. Recommend several reports be updated and coordinated to provide comprehensive estimates across all future uses for Richmond Town, and there needs to be a pre-Covid base year stock for all uses. At the moment evidence is piecemeal or missing, and it would be unwise to place too much weight on the quantitative estimates of the future. Should be recognition of uncertainties and risks, apply sensitivity analysis and focus on planning controls. Do not believe estimates are robust to support major development at Richmond Station or higher buildings. 	<ul style="list-style-type: none"> • Primary Shopping Areas have now been defined in the larger centres and the policy approach updated to reflect these. • Some revision has been made to the text to clarify that the sequential test as set out in the NPPF is to be followed. Part C – The policy text has been revised to include reference to Site Allocations. Part F – The sentence relating to the inappropriateness of out-of-centre development has been deleted. • A reference to markets is added to the policy and supporting text, in line with the NPPF. • The updated RLNS Phase 2 has been used to update the approach to retail. Additionally, other elements of the evidence base have also been updated to provide the most accurate data at a time when the economy has experienced an unprecedented degree of change. • Reports have been published separately as per industry standards but have been produced in a co-ordinated way. • The Council notes that more than one respondent refers to the introduction of Class E. Policies are designed to be flexible in terms of change of use so that vacant retail premises can be occupied by other commercial and community uses.

<ul style="list-style-type: none"> • A comment the Local Plan should provide town centre and primary shopping area boundaries, and only defined frontages where they can be justified, to reflect the NPPF and PPG. Part C of the Policy requires major development that generates high levels of trips to be located within a town centre boundary, but this is not consistent with other parts of the Plan, notably the Site Allocation for Kew Retail Park; amend the text to refer to specific allocations. Part F states out of centre development is not considered appropriate in line with the London Plan, but the London Plan does not preclude it; amend the text to refer to where out of centre development involves the replacement of existing out of centre development and/or in accordance with Site Allocations. Part F refers to the sequential test for main town centre uses and impact assessments for retail and leisure, but should refer to proposals outside of defined centres and not in accordance with an up to date development plan; the sequential test should not apply to proposals at Kew Retail Park (or any other retail allocation). Similar inconsistencies in relation to the impact test. • A comment welcome the recognition of the implications of Use Class E and changes to permitted development rights. • <i>Virtual event feedback:</i> In terms of ideas for Richmond’s cultural quarters, there was demand for pop-up and season use of spaces, as well as emphasising ‘hidden gems’ and heritage, culture and art trails. There were many comments in support of improved wayfinding and sign-posting, as well as noting the lack of public toilets and bins that became particularly apparent during lockdown. Clarity over what is considered ‘culture’ in planning terms would be appreciated, as there was support for the concept of cultural quarters but concern of activities or certain uses being excluded. It was also recognised that the Council should not always be organising, but encouraging and supporting residents to organise their own arts and culture events. Ideas for highlighting our local assets included: • Breakdown barriers to ensure people feel able to attend. • Links and connections to other cultural places. • Transport links between more local areas and key stations. • Increased use of the river as a third is greenspace. • More murals and public art. 	<ul style="list-style-type: none"> • There is no need to specifically mention Twickenham Stadium. Policy as it stands would not preclude appropriate development there.
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Policy 19. Managing impacts

- A comment in support of the policy, noting effect of Use Class E. Suggest in Part D add reference to betting shops, public houses, bars and takeaways, where the potential to reduce diversification of uses applies as well as potential to affect amenity of residents, compromising the notion of community in the 20 minute neighbourhood.
- A comment in support of the policy, while there needs to be flexibility to reflect changes in society (e.g. shift from retail to leisure) there must be a balance to take account of residents enjoyment of their properties.
- A comment note Government is considering making external areas, brought into temporary use during the pandemic, a permanent right; if this transpires need to designate suitable frontages capable of mitigating adverse impacts.
- The Mayor of London note the Policy aligns with London Plan Policy D13 on the Agent of Change principles; a reference to D13 would be welcomed.
- A comment note the support in the Plan to the Richmond town centre night-time economy and extending to the Riverside and Richmond Green, and welcome caveat the impact needs to be controlled and amenity of residents protected. Recommend greater distinction between evening and night-time economies, and oppose supporting a night time economy in Richmond Town and around Richmond Green and the Riverside due to resident harm. Richmond town and surrounding areas have one of the highest ratios of pubs/bars to residents to the whole of London and confined to a small area, public transport is reduced by midnight and police and cleaning resources not available at night time. Support the evening economy but the town needs to wind down by midnight. Urge the Plan to go further to discourage closing hours past 11pm in Richmond town.
- The CCG support part D to avoid an over-concentration of uses which can have a detrimental impact on health and wellbeing. Suggest extend reference to pawnbrokers, pay-day loan stores and amusement centres in line with paragraph 6.9.5 of the London Plan; remove reference to public houses as overconcentration is unlikely to occur.
- A comment from McDonald's Restaurants which supports the policy objective of promoting healthier lifestyles and tackling obesity but considers the policy
- Removal of specified frontages/areas subject to specific restrictions of public houses, bars and hot food takeaways, as changes in Government policy have brought flexibility on what changes can occur in our centres, and there is insufficient evidence to justify such an approach in these locations.
- It is noted there are some respondents who would like policy to be even stronger in terms of restricting certain types of uses, including the night-time economy as a whole. Two respondents suggested that specific uses could be added to the non-exhaustive list of examples. However, it is considered that the policies as drafted are suitably flexible but provide a strong degree of protection against deleterious impacts.
- The London Plan policy E9 is a very similar policy on new takeaways within 400m of schools, with which the Local Plan should be in general conformity. It is considered unnecessary to make revisions bearing in mind the London Plan and that there remains a continuing need within the borough to retain such a policy.
- A reference has been added to London Plan policy D13 Agent of Change in response to the representation by the GLA and further amendments made to the text for clarity.

<p>approach (Policies 19 and 51) which assumes all hot food takeaways are harmful to health is not supported by evidence. Provide examples of the McDonalds business which offer a wide-ranging menu (following steps to reduce fat, salt and sugar in recent years) with healthy meal options and transparent nutritional information to allow for healthy choices; while food high in calories and low in nutritional value can be derived in Class E consents that are not controlled and therefore the approach is inconsistent. Policy fails to acknowledge the wider benefits of restaurants, including for community health and wellbeing. The policy approach is inconsistent with national policy on positive planning, and discriminates against hot food takeaways without mention of other possible reasons behind the national high levels of obesity.</p>	
<p>Policy 20. Local shops and services</p>	
<ul style="list-style-type: none"> • A comment agreeing with the policy to resist the closure of pubs. • A comment the Council should reduce business rates, which are an impediment to small operators. 	<ul style="list-style-type: none"> • Support for the policy is noted. A reduction in Business Rates is beyond the remit of the Local Plan.
<p>Increasing jobs and helping business to grow and bounceback following the pandemic</p>	
<ul style="list-style-type: none"> • A comment recognising the housing schemes at Greggs Bakery site, Twickenham and St Clare Business Park have been refused on insufficient employment/industrial use, but there should be some flexibility in largely residential areas, especially where difficulty of access. • A comment concerns the employment policies are too binary, separating office and industrial uses, and the evidence base and supporting text sets out a need for flexibility in the provision of uses and floorspace. Policy approach could result in an inability to be responsive to the borough’s needs, hinder investment in retention/upgrading of premises, and does not necessarily reflect how existing employment sites operate or what some sectors need. Many creative industries and SMEs require a mix of uses. Discouraging investment could affect investment in improvements such as energy and water efficiency, which underpin the Circular Economy objectives, and there is limited recognition of role of refurbishment and intensification of existing sites. Policies do not explicitly support proposals that facilitate retention of existing firms where their operational needs have changed and require a mix of uses. Request amendments to policies and supporting text which provides for a more flexible 	<ul style="list-style-type: none"> • The nature of the borough means that many of the existing commercial uses are located in residential areas and this is not a justification in itself for the loss of a commercial site. • Distinguishing between office and industrial uses follows the Use Classes Order, as well as the London Plan and NPPF.

approach, to provide certainty for site owners, support viable operation of a site, and a greater incentive for investing in refurbishment of existing stock to improve workspace quality and increase number of employees, energy efficiency and longevity of the stock. This will also provide certainty for occupiers. This would avoid having to determine primary and ancillary uses, and avoid empty units or businesses going outside of the borough. It would provide flexibility to achieve appropriate intensification. A similar approach to that taken in Camden’s Local Plan is suggested.

Policy 21. Protecting the Local Economy (Strategic Policy)

- Port Hampton Estates (landowner) while support the principles included in Policies 21, 23 and 24, they need to take account of site specific conditions that may not enable reprovision of employment space or provision for a range of types of commercial units, particularly on sites such as Platts Eyot where opportunities limited by access arrangements and site conditions.
- A comment note the aim to make office space more efficient but see little about how this will be done particularly in the light of occupational changes accelerated by the pandemic.
- The Royal Parks support protection of the local economy but any increase in number of workers could increase footfall in Richmond and Bushy Parks; keen to ensure Parks are protected and any additional pressure on them mitigated.
- BMO Real Estate comment on Onslow Hall (landowner) that supply of high quality office accommodation is outstripping demand, with secondary space not being taken up. Provide report on Onslow Hall marketing which remains largely vacant, reflecting difficulties faced by unflexible accommodation. Suggest wording should reflect the London Plan which recognises that some office space is no longer viable and there will be instances of surplus office capacity.
- A comment the policy does not recognise other sectors which provide valuable employment and socio-economic advantages for example leisure and tourism sectors, and policy should be revised to take into account such redevelopment possibilities.
- London Square comment the policy is contrary to the London Plan and should be amended to retain employment capacity whilst also taking into account

- Specific site considerations and policy requirements are weighed up as part of the Development Management Process (including where an application relates to a Listed Building).
- The Employment Sites and Premises Needs Assessment 2021 has identified an ongoing shortfall in the amount of office and industrial floorspace in the borough. The update in April 2023 considered recent (post-pandemic) economic data. There has been a reduction in need for office floorspace since 2021 however industrial need has remained at the same level.
- Introduction of Class E provides greater flexibility for the consideration of other commercial uses on certain sites. The B2 and B8 use classes have been retained. Leisure and tourism uses are considered under other policies.
- Changes made to policy 21 and policy 22 to recognise the importance of the voluntary and community sectors in the borough.

<p>employment type and quality, and note there are no Strategic Industrial (SIL) designated in the borough. Employment designation in the borough serves less of a strategic role, and set out that the Greggs site (landowner) meets none of the criteria being in a residential area with low footfall, PTAL rating of 2, located far from the strategic road network and in an existing condition where full redevelopment and high capital costs are required for any use. The highways and amenity impact cannot be mitigated, full re-provision would give rise to the same impacts and would affect the amenity of adjoining residential properties.</p> <ul style="list-style-type: none"> • A comment paragraph 19.3 should be amended to protecting viable employment land within designated employment areas to reflect London Plan Policy E1. • The Richmond CVS comment on the challenge of affordable and conveniently located office accommodation. The needs of the sector have not changed as a result of the pandemic and there is still a need for in-person services, and co-located office accommodation that offer flexible work spaces and hybrid delivery, and potential to create a participatory, inclusive and community focused economy. The accommodation needs of the voluntary and community sector need to be recognised. There should be a commitment to the long-held ambition for a voluntary sector hub, or hubs, offering affordable office and meeting spaces for the VCS. • A comment paragraph 19.4 should recognise constrained facilities and layout of listed buildings when upgrading office stock; add reference that if cannot be successfully upgraded then consider alternative viable uses. • A comment paragraph 19.7 should recognise some listed buildings may not be adaptable to provide affordable and flexible workspace. 	
Policy 22. Promoting jobs and our local economy	
<ul style="list-style-type: none"> • The Royal Parks welcome the note in the supporting text that the Parks offer opportunities for economic spin-offs. Important that any resultant increase in footfall within the Parks is effectively mitigated through support for their work to protect and conserve them. • A comment the requirements for high standards of workspaces should be included in Policy 23 which relates to protecting existing offices. 	<ul style="list-style-type: none"> • Amendments to policy 21 and policy 22 have been made to recognise the importance of voluntary and community sectors in the borough. • Policy 23 also makes reference to refurbishment of existing office floorspace and the requirement for refurbishment to improve the quality, flexibility and adaptability of office space for different sizes. • Note LGC response that site should be allocated for mixed use development.

<ul style="list-style-type: none"> • A comment welcome support for TV, film studio capacity and river-related/dependent industries. • LGC Ltd (landowner) comment their headquarters on Queens Road, Teddington should be allocated for mixed-use development. Set out their intent to secure a future for LGC in Teddington, with a high quality office and laboratory headquarter building for LGC while also delivering a ‘third-party’ employment buildings(s), affordable workspace and space for SMEs, and residential development. Details the previous representations submitted and the existing facilities continue to become unsustainable and uneconomical. Details the indicative scheme for a balance of development, re-providing and enhancing the existing net employment space on site. Seek a land-use allocation for mixed-use enabling development, to make effective use of the brownfield site to reflect the NPPF. • A comment the policy adopts a narrow view of employment floorspace and should recognise much employment takes place and is reliant upon sectors such as retail, health, leisure and tourism. Add at part A.8 leisure and tourism sectors. 	<ul style="list-style-type: none"> • Introduction of Class E provides greater flexibility for the consideration of other commercial uses on certain sites. The B2 and B8 use classes have been retained. Leisure and tourism uses are considered under other policies.
Policy 23. Offices	
<ul style="list-style-type: none"> • A comment that the policy should reflect London Plan Policy E1 and Policy 22 so that existing unviable office space is not restricted by the policy, and should be considered for alternative uses. • A comment that it is not clear how the forecasts fit in with post-pandemic uncertainties around demand. • The Mayor of London comment London Plan Policy E1 supports the focus of new office development in town centres, however the Key Business Areas should be supported by improvements to walking, cycling and public transport. • A comment support the reference to marketing evidence. Reference should be made in paragraph 19.19 to listed buildings and recognition there may be heritage benefits arising from a change of use from offices. 	<ul style="list-style-type: none"> • Specific site considerations and policy requirements are weighed up as part of the Development Management Process (including where an application relates to a Listed Building). • The Employment Sites and Premises Needs Assessment 2021 has identified an ongoing shortfall in the amount of office and industrial floorspace in the borough. An update to the employment evidence in 2023 found that there was a lower need for office floorspace, albeit still a positive need for the Plan period. • Amendment to policy to make reference to encouraging active travel in Key Business Areas.
Policy 24. Industrial land	
<ul style="list-style-type: none"> • A comment from Shurguard their storage facilities are a key economic benefit. Suggest that reference to ‘no net loss’ of industrial land should be removed from the policy, requirement for greater clarity in Policy 24 regarding the 	<ul style="list-style-type: none"> • Requirement for ‘no net loss’ of industrial floorspace is considered appropriate in Richmond context in light of employment evidence.

<p>provision of affordable employment space and flexibility when considering applications for industrial (storage) uses outside employment designations.</p> <ul style="list-style-type: none"> • A comment should designate Arlington Works as a Locally Important Industrial Land and Business Park to allow for the neighbouring Twickenham Studios to expand. • A comment noting paucity of industrial land in Mortlake and East Sheen area; reference to the Big Yellow storage unit and no mention of the potential loss of Stag Brewery site. • LGC Ltd (landowner) commented on inflexibility of ‘no net loss’ approach in this policy and scope for intensification and co-location of industrial uses to achieve policy objectives; suggest more flexible wording. • The Mayor of London note the evidence base and few options to address this deficit; approach will help to protect existing floorspace and potentially provide a net increase as supported by London Plan Policy E7. • London Square comment that the Greggs site is inappropriate for industrial use and is being promoted for residential-led development. • London Square object to the inclusion of the Greggs site as a designated Locally Important Industrial Land and Business Park in the West Twickenham cluster, as future needs for employment land can be met through other sites or even mixed-use redevelopment. Raise inconsistencies between the LBR’s Draft Local Plan (as worded) and the London Plan (2021). • Rename Marlborough Trading Estate as 159 Mortlake Road and de-designate as Locally Important Industrial Land and Business Park. 	<ul style="list-style-type: none"> • The Employment Sites and Premises Needs Assessment 2021 has identified an ongoing shortfall in the amount of office and industrial floorspace in the borough. It is a priority of the Local Plan to continue to protect industrial land. The update in February 2023 considered recent (post-pandemic) economic data and found the industrial need for the Plan period to be the same. The industrial stock in the borough has continued to decline. • Note Mayor of London’s support for Policy 24. • The nature of the borough means that many of the existing commercial uses are located in residential areas and this is not a justification in itself for the loss of a commercial site. The policy is informed by the evidence which has identified a need to protect existing employment sites.
Policy 25. Affordable, flexible and managed workspace	
<ul style="list-style-type: none"> • A comment there is different wording to Policy 24 part B and should be clarified. The policy is ambiguous and does not state what proportion of employment floorspace will be required to be affordable and at what rate of affordability (only within the supporting text). It is not clear the 1,000sqm threshold is viable. Flexibility should be incorporated to allow for an off-site contribution where provision on suitable sites is not feasible. Suggest detailed wording to include in policy a minimum of 10% affordable light industrial workspace will be required in all major developments, at 80% of local market rates for a minimum of 15 years. 	<ul style="list-style-type: none"> • Affordable workspace policy encapsulates all types of provision, whereas policy 24 specifically refers to provision on industrial sites. • Evidence base for policy is Employment Sites and Premises Needs Assessment which identified limited availability of this type of floorspace in the borough, as well as high rents more equivalent to fringe of central London than an outer London borough. • Supporting text to the policy provides detail regarding thresholds and targets for provision of affordable workspace.

<ul style="list-style-type: none"> • A comment part B.3 does not provide any threshold as to when securing the appointment of managed workspace providers will be required, suggesting even a minor amount of new floorspace as an extension to an existing premises would be subject to this requirement. Unworkable in practice and could impact on viability. A threshold should be provided and/or made clear it would not apply to extensions to existing premises. • A comment agree with the aims set out. • The Mayor of London welcome the policy, protecting existing affordable workspace and requires new provision in line with London Plan Policy E3. Should ensure this is supported by local evidence in accordance with E3 part C and in the circumstances outlined in part B. • A comment appreciate the supporting stance towards smaller-scale businesses and intended delivery of affordable workspace in accordance with London Plan Policy E3. Policy does not provide adequate detail in terms of specific affordable workspace targets. A suggested minimum target for developments proposing over 1,000sqm is in the supporting text only, and not supported by a detailed evidence base. Policy provides no provisions to take into account site specific viability; this should be incorporate and to accept a level of affordable workspace below policy requirements in exceptional circumstances and where it is robustly justified. 	<ul style="list-style-type: none"> • Local Plan policies have been subject to viability testing, and detailed viability evidence is considered on a case-by-case basis. • Planning Obligations SPD provides further guidance on delivery of affordable workspace. • 1,000sqm threshold is gross and can include extensions to existing premises. • Part B.1. of policy 25 directs new affordable workspace provision to the borough’s town centres. This does not preclude its provision within major developments that may be located outside the town centres given the limited opportunities to secure this type of provision in Richmond and its accessibility to different active travel modes.
Policy 26. Visitor economy	
<ul style="list-style-type: none"> • The Royal Parks comment Richmond and Bushy Parks should be specifically including in the policy, and supported in providing the infrastructure to support visitor numbers. • A comment there is potential for expanding this within the Mortlake & East Sheen Society area associated with the river, Stag site, Sheen Lane Community Centre, Richmond Park and local/passing trade demands for seating and al fresco areas. • RBG Kew welcome the policy including Kew Gardens and other assets connected via the River Thames. Note that proposals leading to increased visitors and tourists will be assessed against transport policies, and that events at RBG Kew lead to increased visitors at certain times and are an essential part 	<ul style="list-style-type: none"> • The list of major attractions included in the policy is not exhaustive and no changes are proposed to extend the list. It is considered that proposals for temporary events are more appropriately considered on an individual basis, bearing in mind the uniqueness of RBGK. It is not considered necessary to give further encouragement to the redevelopment of existing visitor accommodation sites. Such proposals would in any case be considered against all plan policies including those relating to the location of development and wider transport issues.

<p>of the visitor attraction and of great benefit. Suggest temporary events could be considered in the plan (see also Policy 32).</p> <ul style="list-style-type: none"> • RFU comment Twickenham Stadium should be added to the existing attractions that the borough will support, promote and enhance, adding as a criteria to part A supporting appropriate development which complements the use as an internationally significant sports and entertainment venue. • The National Trust support the Policy supporting sustainable growth of the visitor economy. Particular support for A.1 and the reference to Ham House and A.4 as it recognises approaches to and from visitor destinations. • A comment that policy support needed for additional visitor bedspaces with reference to other Local Plan policies may make proposals unacceptable, particularly for existing development that happens to be outside of a town or district centre; add reference to B.2 to add support for development and redevelopment of existing visitor accommodation sites. 	
<p>Policy 27. Telecommunications and digital infrastructure (Strategic Policy)</p>	
<ul style="list-style-type: none"> • FORCE support the policy to ensure appropriate siting and minimising the number of sites. Oppose siting of such infrastructure within the Crane corridor, as will intrude visually and into tranquillity. • A comment that all applications for masts should include visual impact studies, for the promotor to assess the impact. • A comment of support for the Council's position. 	<ul style="list-style-type: none"> • It is considered the policy reference to appropriate siting is sufficient to consider site proposals. • A photomontage, whilst helpful, is not essential to making a decision on such a planning application, thus it would not be reasonable to make this a policy requirement.
<p>Protecting what is special and improving our areas (heritage and culture)</p>	
<p>Policy 28. Local character and design quality (Strategic Policy)</p>	
<ul style="list-style-type: none"> • A comment pleased to see the Council will resist removal of shopfronts of architectural or historic interest and shopfronts including signage and illumination should complement the surrounding street-scene and buildings. From experience, know that many owners/leaseholders are not aware nor advised by agents of this. Asks if there is some way the Local Plan can ensure this is done properly and regularly communicated to interested parties. • The Royal Parks comment the scale and nature of Richmond and Bushy Parks is such they are considered to be a significant influence on local character; it is important development does not threaten their character. The inclusion of the 	<ul style="list-style-type: none"> • Shopfronts SPD is referenced which provides detailed guidance. • Impacts on character of Green Belt and MOL considered elsewhere. Policy amended to clarify developments and the way they connect or relate to wider open space network needs to be considered as part of this policy. • Comments relating to lighting considered elsewhere. • Comments relating to design of health facilities considered elsewhere. • Purpose of Urban Design Study considered in detail earlier in the Plan – not considered necessary to repeat in this policy.

Parks' importance and reference to their protection should be included within this Policy.

- Habitats & Heritage strongly support the need to ensure lighting is appropriate and does not have a detrimental impact on biodiversity and biodiversity species. The Council needs to keep up with current research which is showing some lighting previously considered non-detrimental is having a detrimental impact.
- The CCG support the policy. The National Design Guide sets out ten characteristics of well-designed places, including movement, nature, safe and socially inclusive public spaces, mixed and integrated uses and healthy and sustainable homes and buildings, all of which contribute towards health and well-being. Suggest the Council's Public Health team are involved in the local design coding process. Refer to numerous national accreditations and standards which seek to improve design, and NHS England advice on designing healthy places. When setting out requirements relating to health and care facilities, there is a need to include a specific reference to DHSC's Health Building Notes which provide guidance on design and planning new healthcare buildings and their immediate environment. *See also comment on Policy 51 in relation to housing design to ensure homes are healthy.*
- A comment note the addition of nine new principles such as the promotion of energy efficiency, urban greening etc. however note one phrase in LP1 has disappeared – gated developments will not be permitted – and ask why and whether this is because it has proved to be unrealistic.
- Two comments the wording on part A needs to be amended to refer to the Borough's Conservation Areas as well as to the 'character areas' and 'places' identified in the Urban Design Study characterisation work, given the statutory protection enjoyed by such designated heritage assets. The wording needs to be amended to define the 'places' identified in the UDS, and the purpose of such a designation.
- A comment while the drafting of the Policy is generally supported, part B is unsound. Recommend amendment to refer to 'where appropriate' enhances the local environment and character.

- Amendment to include 'maximise opportunities to' under Part B of the policy in relation to developments being required to enhance local character.
- Individual types of adverts are not prohibited as part of this policy.
- Energy efficiency in digital advertising displays will be encouraged as part of the guidance on adverts.
- Additional information about the Secured by Design scheme referenced in policy and encouragement to consult with the Metropolitan Police at an early stage in the supporting text.

<ul style="list-style-type: none"> • A comment on paragraph 20.22 should ensure banners are still included in the list of banned advertisements especially on MOL, as individual coaches and clubs would like their own banners. • A comment digital advertising displays are energy wasteful and serve minimal public utility. Policies should ensure energy utilisation is minimised e.g. static displays, require no additional lighting or energy, and not just be about the visual appearance. Provided links to research. • The Metropolitan Police Service – Crime Prevention and Designing Out Crime set out the Secured by Design scheme has proven results in reducing crime and the fear of crime, and successful in reducing anti-social behaviour through a raft of measures including design/layout of new homes. Support reference part B.11 and would like to encourage early consultation with the Metropolitan Police Designing-Out Crime Officers (DOCO's) as well as following the Secured by Design Guides for New Homes/Schools/Commercial as applicable. Suggest an additional point to add to part B to: Council to consult the Metropolitan Police on all applications involving major development, significant community interest or those deemed appropriate by the LPA, and in certain circumstances achieving Secured by Design certification may be required as a condition; applicants should consult the Metropolitan Police at the earliest opportunity and include details of security and secured by design compliance in the Design & Access Statement. Additionally, MPS and Secured by Design can play a huge role in a safe environment, health and wellbeing; research details provided. Consideration should be paid to the Council's duty under section 17 of the Crime and Disorder Act 1998 to consider crime and disorder implications in exercising its planning functions; to promote the wellbeing of the area in pursuance of powers under section 2 of the Local Government Act; and ensure development provides a safe and secure environment in accordance with London Plan Policy D11 section B and paragraphs 3.11.3 and 3.11.4. 	
<p>Policy 29. Designated heritage assets</p>	
<ul style="list-style-type: none"> • The Royal Parks welcome the Council's approach to heritage assets, especially the protection and enhancements of the Borough's Historic Parks and Gardens. • A comment in relation to part A.8, note this will have to address the challenge of accommodating protection of protected open lands and heritage assets with 	<ul style="list-style-type: none"> • Requiring developments to enhance 'where possible' (the borough's Historic Parks and Gardens') accords with the NPPF. • Re-wording of part A.2 in relation to total loss of or substantial harm to a listed building in response to comments from Historic England.

satisfying perceived strategic needs, including how Kew WHS will be protected and enhanced in light of development in Hounslow which would impact negatively on the OUV (*see also comments on Policy 2 and the place-based strategies*).

- Historic England recommend amendments to part A.2 as equates substantial harm with the total loss i.e. demolition, of an asset rather than dealing with significance. The NPPF is clear substantial harm can occur without demolition or total loss of the asset. Furthermore when considering substantial harm, the term resist is a weaker test that is unlikely to be effective given such harm should be either exceptional or wholly exceptional (depending on the grade of the asset), and the NPPF goes on to tell us where a proposal will lead to substantial harm of total loss of significance consent should be refused. Ideally not to duplicate the NPPF tests, however if a policy criterion is included it should better reflect the NPPF. However, if the intention of part A.2 is not to deal with substantial harm but instead to maximise embodied carbon through retention rather than demolition of buildings, this could be drawn out as a separate issue – a criterion covering just the importance of reusing and repurposing heritage assets. In either situation policy criterion should be amended and split into covering the differing issues 1) substantial harm 2) demolition, re-use, and embodied carbon. It would be helpful at part E to reference the risks proposed by maladaptation; suggested wording ‘to avoid maladaptation’.
- A comment nothing is said about issuing enforcement notices where owners have left listed buildings or BTMs to decay.
- Royal Botanic Gardens Kew generally support the policy as largely reflects the NPPF. However part A.3 resists the change of use of listed buildings where their significance would be harmed, particularly where the current use contributes to the character of the surrounding area and sense of place. The change of use of a building is not generally controlled by the listed building consent process; it is a matter of whether constitutes development. Furthermore the change of use of heritage assets can be a positive to bring back into a functioning, viable use consistent with their conservation; in turn helps to secure investment in their upkeep to preserve them. PPG also acknowledges the ‘optimum viable use’ is

- Policy text on embodied carbon that would be maximised through retention of buildings moved to supporting text.
- Issuing of enforcement notices falls outside the planning policy process and relates to the legal powers contained in the Planning (Listed Buildings and Conservation Areas) Act 1990. Each enforcement situation will be carefully considered on a case-by-case basis.
- Additional text added to part A.3 in relation to resisting the change of use of listed buildings where their significance would be harmed ‘unless it secures the optimum viable use and/or there are public benefits that outweigh the harm’ in response to comments from Royal Botanic Gardens, Kew.
- Part B of policy amended to correct drafting error (duplication of earlier text).
- Additional text added to supporting text paragraph 20.29 to make a stronger link to policy 31 on views and vistas in relation to development affecting heritage assets, in response to comment from National Trust.
- A number of amendments in response to comments from Nick Alston, Avison Young (on behalf of St George Plc and Marks & Spencer – response number 880) whilst other parts of the policy were considered to be sound and have not been changed.

not necessarily the original use. While harm to significance should be generally avoided, changing the use of a historic asset is sometimes necessary to secure other heritage and public benefits and this might be better reflected in the policy. RBG Kew welcome recognition in the Plan there is a balance between securing energy and carbon savings in historic buildings while protecting their architectural and historic significance; suggest acknowledgement of this is within the main energy and sustainability policies (3 to 7). Part F recognises whilst energy and carbon savings in historic and listed buildings are supported, there are limitations given the heritage value of the buildings and need to protect sensitive fabric; the supporting text acknowledges each proposal will be assessed on a case by case basis – RBG Kew support this approach dealing with the complex but important balance, and encourage a focus on accommodating building efficiencies, where other potentially intrusive options could cause greater harm to significance. Highlight a reference effort at paragraph 20.27 which refers to RBGK WHS as Policy 28 rather than Policy 32.

- A comment part B duplicates part A.9; one of these has to be deleted.
- The National Trust supports the Policy, and the wording within requiring developers to also have regard to the setting of heritage assets when considering the significance of the borough's designated heritage assets; while support paragraph 20.29 this could be strengthened by linking with Policy 31 Views and Vistas. Climate change is the single biggest threat to the precious landscapes and historic houses, and are tackling the causes of climate change by reducing emissions with an environmental pledge to be carbon net-zero by 2030 across our own emissions and those created by our supply chain and investments; pleased the draft Plan recognises historic and listed buildings will need to adapt and that sympathetic measures to make energy and carbon savings in historic and listed buildings are encouraged (criterion F) as will allow us to adapt our significant historic buildings.
- A comment consider the Policy to be unsound and suggest amended wording. NPPF states where a proposed development will cause harm to a designated heritage asset (whether that be substantial or less than substantial), clear and convincing justification is required in order to demonstrate that such harm is outweighed by the public benefits of a proposal. Parts A.4, A.6, A.8 and A.9 are

<p>considered too specific, particularly in reference to the requirement to retain and preserve original structures, layouts and architectural features; there is no requirement in national policy or the London Plan to reinstate historic features, not least in cases of buildings of multiple periods, as it may not be appropriate to reinstate features of a particular phase of a building's history.</p> <ul style="list-style-type: none"> • Two comments no change proposed. 	
<p>Policy 30. Non-designated heritage assets</p>	
<ul style="list-style-type: none"> • FORCE are disappointed the policy makes no explicit reference to the preservation and enhancement of the borough's historic industrial sites and watercourses e.g. formerly industrial landscape of Crane Park with its water power, Little Park and historic water features in grounds of Kneller Hall. The whole of the Crane corridor is an area of archaeological importance, and it should be protected and promoted as a heritage and educational asset as other assets identified in paragraph 20.37. • A comment nothing is said about issuing enforcement notices where owners have left listed buildings or BTMs to decay. • A comment pleased that historic walls dating from the 18th and 19th centuries have recently been designated as BTMs but there are numerous other walls not included and hope these will come to be recognised as 'other historic features'. Logical the applicants' requirements have been moved to the supporting text. • A comment the policy is not consistent with the NPPF, which requires the effect of an application on the significance of a non-designated heritage asset to be taken into account; there is no requirement to preserve or enhance the significance of non-designated heritage assets. Suggest amended wording to refer to significance, and a balanced judgement. • Two comments no change proposed. 	<ul style="list-style-type: none"> • Reference to the borough's historic industrial sites and water courses has been added to the examples in the supporting text of non-designated heritage assets. • The issuing of enforcement notices falls outside of the planning policy process. • Process for designating Buildings of Townscape Merit falls outside the Local Plan process. • Policy 30 is considered to be consistent with the NPPF.
<p>Policy 31. Views and vistas</p>	
<ul style="list-style-type: none"> • The Royal Parks welcome the Policy as aims to protect the quality of identified views, vistas, gaps and skyline which are important factors in the Parks. Commend inclusion of King Henry VIII mound as a protected view. Would like to work further with the Council to positively manage views from the Parks. • Historic England comment a helpful Policy with appropriate criteria for assessing development proposals. Support the criteria to seek improvements to 	<ul style="list-style-type: none"> • A list of new local views for designation in the Local Plan is referenced in the draft policy and included in the supporting text, further to consultation on a draft Local Views SPD in 2022. • Policy wording will be amended to specify that harm to the quality of views etc should be avoided.

remedy existing harm; suggest amended wording to state “avoid harm to” rather than “protect” or “respect” the quality of views and settings etc. as that is less ambiguous.

- A comment support the approach, but biggest threats are from applications for high rise buildings outside the borough.
- FORCE support the policy of protecting views and vistas, and encourage the Council to explore opportunities to create new views and vistas with reference to the River Crane corridor (trust these requirements will take precedence over Policy 45 on tall and mid-rise buildings).
- A comment look forward to consultation on the additional views identified.
- Royal Botanic Gardens Kew generally support the Policy. However, seek clarification as to how the views have been assessed. Support any proposal affecting a designated view or vista to have to submit CGI and visual impact assessments; particularly relevant for Kew Gardens which is highly sensitive to impacts of surrounding development. Wish to be kept informed of the Views and Vistas SPD.
- The National Trust support the Policy, including criterion A.1 as seeks to protect the quality of the designated views and vistas, and support the requirement for proposals affecting these to be supported by CGI as use of visualisation will help communicate the visual impacts of proposals. Wish to be kept informed of the Views and Vistas SPD.
- A comment the Policy is too prescribed and elements do not conform with the London Plan, which states that development should not harm, and should seek to make a positive contribution to, the characteristics and compositions of Strategic Views and their landmark elements. Recommend redrafting to be in line with the London Plan, Policy HC4 and the London View Management Framework.
- The Mayor of London comment the London Plan identifies the King Henry VIII’s Mound to St Paul’s Cathedral linear view as a protected vista, which should be managed by following the principles of London Plan Policy HC4 and this should be noted in the supporting text. Welcome recognition of the importance of CGI and 3D modelling in the policy and paragraph 20.44.

- The Council commissioned consultants (Arup) to carry out analysis on the borough’s views, alongside the Urban Design Study. Existing documents, such as Conservation Area Appraisals, were reviewed, and site visits carried out to recommend whether existing views were intact and whether there were any new views which merited designation. Further analysis was carried out in the draft Local Views SPD which sets out existing protected views, as well as newly identified locally important views.
- Reference to Policy HC4 of the London Plan will be noted in the supporting policy text for the management of the view from King Henry VIII’s Mound to St Paul’s Cathedral.
- It is not considered any further amendments are necessary to reference tall and mid-rise buildings or make the policy less prescriptive.

Policy 32. Royal Botanic Gardens, Kew World Heritage Site

<ul style="list-style-type: none"> • Historic England suggest amended wording to make reference to Outstanding Universal Value in part A, and an additional criterion in the policy requiring development within or around the WHS to provide a HIA upon application to accord with guidance. Suggest it would be helpful to explain how the Council will refer relevant applications to UNESCO in the supporting text. • Royal Botanic Gardens Kew support the site-specific policy, but request the Council recognise the effective management of the WHS requires an appropriate balance between the needs of conservation, access, interests of visitors and the local community, and sustainable economic use and operation of the site. Request a degree of flexibility and scope, with a fourth point added to part A about ensuring the long-term sustainability of the WHS requiring a careful balancing between the needs of conservation, access, biodiversity, the climate emergency, income and the public benefits of any development on the site. Request a fifth point added to part A to recognise temporary events and exhibitions are a key part of the offer and are supported in principle. Suggest updating detailed references to the WHS documents. • Mayor of London welcome the policy in line with London Plan HC2. The requirement for development proposals with the potential to affect the WHS or it setting to be supported by HIA should be in the policy not the supporting text. 	<ul style="list-style-type: none"> • Outstanding Universal Value of the WHS covered in separate bullet point of the policy. • Requirement for Heritage Impact Assessment considered on a case-by-case basis, and is proportionate to the scale of development that is being proposed. • There is not a process in place for referring applications affecting the WHS to UNESCO (UNESCO inscribes new WHS). Ongoing protection of the WHS takes place through partnership working that sits outside the Local Plan (detailed in paragraph 20.51). • Most appropriate approach to considering exceptions to the policy (including on temporary events and exhibitions) continues to be on a case-by-case basis. • Policy amended to refer to ‘current’ Royal Botanic Gardens, Kew World Heritage Site Management Plan. • Reference to Kew Landscape Masterplan removed as now outdated.
<p>Policy 33. Archaeology</p>	
<ul style="list-style-type: none"> • A comment that there is insufficient time allowed for archaeological field investigations on the Stag Brewery site. 	<ul style="list-style-type: none"> • Comment relates to a specific planning application for the Stag Brewery. Noted no comment on the draft policy.
<p>Increasing biodiversity and the quality of our green and blue spaces, and greening the borough</p>	
<ul style="list-style-type: none"> • A comment the Biodiversity Plan looks great. It would be good to see inclusion of support for Nature-Connected Neighbourhoods, including urban hedgerows, swift tiles, hedgehog highways and wildlife gardening as equitable access to green and blue spaces. It would be great if the Council adopt the Wildbelt strategy as recommended by the Wildlife Trusts. • River Thames Society set out the borough is very important to the river, being the only London Borough with territory over both banks. Includes water that is fully tidal up to Richmond, half-tidal between Richmond and Teddington, and then non-tidal further upstream. As such helps demonstrate the diversity of the Thames which is celebrated. River Thames Society share the sentiment in the 	<ul style="list-style-type: none"> • Add a reference in the strategic objectives to engaging with local community groups invested in the protection and enhancement of local green and blue assets. • No further amendments to refer to nature-connected neighbourhoods, interlinked wildlife sites, as the Plan sets out the broad strategy to protect biodiversity. • Further regulations and guidance are awaited before proceeding with the nature recovery network mechanism.

Plan to encourage wide enjoyment of the blue/green spaces, and endorse the vision and strategic objectives in the Plan in relation to protecting and improving the unique environment of the River Thames as wildlife corridors, opportunities for recreation and river transport, increasing access to and alongside the rivers, gaining wider local community benefits and habitat improvements when sites are redeveloped. This means protecting river-related vistas and restraining any development which risks overpowering the river environment. An active supporter of the Thames Landscape Strategy and encouraged by the commitment to continued partnership working.

- CPRE London are a membership based charity concerned with the preservation and enhancement of London's vital green spaces, as well as improvement of London's environment for health and wellbeing. Welcome the Council's commitments to protect and retain the borough's Green Belt and MOL, with no changes to the GB boundaries, and protect Local Green Space from inappropriate development, with six new LGS sites. However, raise concerns on the 20 minute neighbourhood concept and whether unearthed opportunities to meet need (*see comments on Policy 1 and the Spatial and Place-based strategies*).
- Richmond CVS play a crucial role in protecting, maintaining and enhancing the green and blue infrastructure, engaging people of all ages – Habitats & Heritage, Friends of Barnes Common, Friends of Crane Park, River Thames Boat Project etc. The Plan should acknowledge the breadth of expertise and community engagement that such groups provide and encourage developers to work with groups to provide the formal and informal education to enable people to learn and connect with nature and biodiversity.
- A comment on wildlife sites – does not go far enough to secure a meaningful network of interlinked wildlife sites for wildlife to move about and ensure genetic diversity. Not fully implemented recommendations in 'Making Space for Nature' by Sir John Newton. About 20 years ago all the railway lineside were recognised as important routes and the following Local Plan deleted them all. Support Whitton Linesides being added, feel the whole route to Richmond Bridge should be added.

<ul style="list-style-type: none"> • The Environment Agency welcome the approach to protect and enhance the borough's' biodiversity and green corridors (<i>see comment on the Sustainability Appraisal against the Introduction</i>). 	
Policy 34. Green and Blue Infrastructure (Strategic Policy)	
<ul style="list-style-type: none"> • A comment why the Policy excludes the public open space hierarchy listed in Policy LP 12. • A comment dogs off the lead are a nuisance; ensure the policies are retained to not permit dogs on the Wandsworth Sports Centre and Richmond Playing Field and keep dogs on a lead on public roads, pavements and footpaths. • The Royal Parks welcome acknowledgement of recreational pressures and impact of increased development on the Royal Parks, and reference to working with the Royal Parks to ensure careful management is achieved. • The Royal Parks welcome recognition of role of green infrastructure in reducing recreational impacts on sites such as Richmond Park. Specific reference should be made within the policy text given the significance of the impact on sites, including the Bushy Park SSSI and the Richmond Park SAC, SSI and NNR. • FORCE support the primacy the Plan places on protecting and enhancing designated open land and other open spaces and the presumption against the loss of, or building on, greenfield sites. Support recognition of importance of smaller pieces of open land in providing continuous linkage, and emphasise significance of the River Crane Valley. Agree residential development is likely to exacerbate pressure on existing green infrastructure; ask the Council to be creative in avoiding the over-usage of existing green spaces. Support protection and provision of pedestrian and cycle routes through green spaces, however important paths are maintained for dual use and the green space characteristics are upheld when selecting alignments and surfaces, in particular avoid lighting in dark corridors. Support recognition of storm water retention opportunities and would like the Plan to recognise the potential for attenuating flooding by naturalising the River Crane below the Mereway Weir, and naturalising riverbanks to improve the recreational value of the river. While recognise potential for trees to promote urban cooling and provide shade cover, the Plan should recognise inappropriate tree planting can reduce biodiversity by blocking light. Would like a more explicit commitment to tackling invasive 	<ul style="list-style-type: none"> • Add a reference to recognise non-designated sites can also contribute to increase biodiversity. • Add a reference to ensure biodiversity value is protected and enhanced in a measurable way. • Add a reference in the supporting text to clarify green corridors, and add to the Glossary. Refer to safeguarding biodiversity in green corridors, through physical infrastructure such as the impact of artificial lighting (with cross reference to Policies 39 and 42). • Dark corridors are not identified in the Plan as there is no policy requirement to do so, and are difficult to achieve in urban areas. • As this is a strategic policy, it is not considered necessary to add further details such as reference to the specific environmental designations for the Royal Parks or on inappropriate tree planting, where matters are covered by other Plan policies.

species. Welcome commitment to encourage multi-functional green spaces and advocacy of SuDS, and recognition of need for long-term management and maintenance. Believe dark corridors are essential for wildlife and quiet spaces are important for wildlife and people; would like to see specific policies to protect and enhance dark corridors and quiet spaces.

- The Port of London Authority support reference to blue and green infrastructure, including aim to enhance accessibility to the blue infrastructure network, particularly rivers and their banks, for leisure and recreational use.
- Habitats & Heritage comment it is essential to protect as well as enhance green corridors, including dark corridors used by bats and other species at night. Green corridors are not mapped and the definition is not clear. Protecting only designated open spaces will not ensure protection for many species most at risk and subject to action plans in the Richmond Biodiversity Action Plan, whereas Policy 39 sets out a more comprehensive vision. Applaud introduction of requirement to provide space for food growing in new developments; this is needed and needs to be part of the design of landscaping of developments at an early stage.
- The Environment Agency are pleased to see value of green and blue infrastructure recognised. Part 2.7 of the Policy would be strengthened if refer to enhancing biodiversity value in a measurable way.
- A comment would like to see wording ensuring wildlife corridors are functional during the night as well as during the day. Unless completely unavoidable, should have no light spill from artificial lighting which has been shown to have detrimental effects on bats. The borough is important for bats, and richness in biodiversity is an important part of the borough's character. The wide extent of artificial lighting causes fragmentation of habitat; to prevent worsening need new lighting to be kept to a minimum and opportunities taken to review existing lighting in areas adjacent to important bat habitat.
- A comment could the commitment in paragraph 12.7 regarding multi-functional green space be included in each of the larger site specific plans, highlighting where this is missing. Site Allocation 10 St Mary's University should be a statement about the biodiversity value of the site and connectivity via the Thames to Ham Lands/Young Mariner's Club. Site Allocation 34 Stag Brewery

<p>should include greater provision for biodiversity, incorporating provision for roosting bats, and a wildlife corridor between the River and Mortlake Green.</p> <ul style="list-style-type: none"> • A comment many community groups want to enhance their local area but face barriers from the Council. A policy encouraging working together would accelerate improvements and attract external funding. • <i>Virtual event feedback</i>: Other ideas included better connections between the ‘Green’ and the ‘Blue’, for example in Radnor Gardens to improve the park to river access for things like paddleboarding and jetties to flow into park. There was also support for more covered outdoor spaces that can be used in all weathers. 	
Policy 35. Green Belt, Metropolitan Open Land and Local Green Space	
<ul style="list-style-type: none"> • A comment suggesting policy wording to add reference to cycle storage as appropriate small-scale structures in part C, and to refer to accessibility for disabled persons and those travelling via Active Travel modes in part D. • The Royal Parks welcome the policy, given both Bushy and Richmond Parks are designated MOL. • A comment ‘very special’ circumstances should be changed to ‘exceptional’ to give the fullest protection. • FORCE welcome the clear statement on Green Belt and MOL protection and associated test of very special circumstances for development, and commitment that visual impacts of developments on sites in proximity will be taken into account. Keen to uphold the sense of “escape” and associated mental health benefits provided by natural vistas, and keen to avoid intrusion of light into dark corridors. Welcome no changes to the Green Belt boundaries. • A comment there is no mention of the importance of the playing fields and other Green Belt land as flood storage areas. For example the playing fields on the Stag Brewery site are in Flood Zones 2 and 3 and should remain green. The Mortlake Brewery Community Group applied to the Council to have the playing fields designated as LGS but there has been no positive response and would like to know the reason. • A comment terminology should match the NPPF and London Plan more closely. 	<ul style="list-style-type: none"> • The policy reference to acceptable inappropriate development has been moved to only be referenced in the supporting text. • A minor amend to the supporting text has been made to address improving accessibility to open land for a range of users; a reference to cycle storage is added to the supporting text. • The detailed comments on the site specific MOL assessments have been considered by the consultants Arup who undertook the Open Land Review. Where appropriate, updates to the methodology/site assessments/scoring have been made in an update to the Open Land Review, although these do not alter the overall outcome of the assessments.

- *See Habitats & Heritage comment on Site Allocation 5 concerned at the MOL release until a plan is agreed for the restoration of the important green corridor and so that relevant parts should be kept as MOL.*
- CPRE London suggest the policy wording is not compliant with London Plan or NPPF; it suggests MOL has policy goals and leaves MOL open to threat from development.
- The Mayor of London is pleased to note the strong protection of Green Belt in accordance with London Plan Policies G2 and G3 and following recommendations of the Open Land Review in retaining Green Belt designations. Note the majority of MOL identified as strong performing with some specific areas scoring weakly including the proposed release of Sainsburys car park and some front gardens. Alterations to MOL boundary should only be changed in exceptional circumstances when fully evidenced and justified; none of the three sites appear to meet the MOL criteria and the Mayor raises no objection at this stage, subject to detailed justification being provided in the supporting evidence.
- A comment in support of maintaining the openness of the Green Belt. General support for the allocated site proposals for Hampton with caveats. Releasing the MOL designation of the Sainsburys car park will only work if adequate customer car parking is retained, and for Hampton Square proposals. *See comments on Site Allocations 1 and 5.*
- A comment the MOL assessments for Little Green and Thames Old Deer Park should be retitled.
- A comment on the pocket of land (landowner) within the former Thames Water Operational land adjacent to west of Sunnyside Reservoir, Lower Hampton Road in relation to the claimed designation as Green Belt and that it is performing weakly against the NPPF criteria. Details the shortcomings and omissions in the Green Belt designation, until 1993 it was part of Spelthorne BC and not designated as Green Belt, and there are no records to legally designate the land as Green Belt. Details the performance against Green Belt criteria, that the site is constrained on all four sides and does not protect a gap between settlements. Refers to the 2017 Local Plan Inspector's Report which set out the

Council should satisfy themselves the Green Belt boundaries were correctly depicted and correct any errors.

- Two comments on the MOL status and boundary anomalies to remove any question of important part of Old Deer Park ceasing to being designated as MOL. The current Policies Map is unclear. The MOL assessment unjustifiably severs the area south of the A316 despite it forming an integral part of the Park, forming the most accessible part of the park from the town and riverside. The eastern third provides an integral part of a pedestrian link. The scoring of the MOL parcel assessments for The Green and Little Green are flawed and do not recognise its accessibility to the riverside and the town, the historic significance and amenity value to the community.
- *See comment from Sainsbury's (landowner) on Site Allocation 5 supporting the removal from MOL.*
- A comment from Putney Town Rowing Club (landowner) the MOL should include the car park adjacent to the boathouse/gatehouse together with the school playing field adjacent and to the west. Allotments in the site are not mentioned.
- A comment the MOL assessment for Fulwell Golf Club contains inaccuracies, errors and omissions. Details provided including public access, allotments, public right of way, biodiversity and contribution to habitat connectivity. Suggest these could have significant potential to result in higher scores for MOL criteria.
- A comment the MOL assessment for Longford E & Schools contains some inaccuracies, providing details including the public right of way, nature conservation, and historic and cultural heritage value, and highlights potential for a wildlife corridor link.
- A comment from Petersham Nurseries (landowner) that the site fails to meet four of the MOL criteria and should be excluded. Suggest the hedgerow and wall provides a natural buffer between the site and Petersham Meadows which is distinguishable from the built environment.
- RFU (landowner) comment the eastern edge of the MOL should be de-designated. Consider the MOL assessment justifies the removal of the hardstanding associated with the Stadium.

<ul style="list-style-type: none"> • A comment from the David Lloyd Club (landowner) that the MOL boundary does not follow any defensible boundary, cutting through the site, and is considered weakly performing and should be released from the MOL. Suggest the boundary is drawn southwards from the tennis courts to exclude the southern portion of isolated MOL land. • Thames Water propose the removal of Hampton Water Treatment Works (landowner) from the Green Belt. The operational site is of strategic importance for London’s water supply and it is inevitable that further upgrades will be required. The site has a built up nature. Disagree with the findings of the Green Belt assessment, which is unclear and flawed. • A comment that the Udney Park Playing Fields Trust welcome the retention of the site as an asset of community value and as LGS. • Habitats & Heritage support the new LGS designations, and ask to consider Teddington Library Gardens as an additional LGS. 	
Policy 36. Other Open Land of Townscape Importance (OOLTI)	
<ul style="list-style-type: none"> • A comment questions whether the biodiversity /nature conservation criteria could stand on its own, removing the reference to meeting one of the above criteria. • A comment wish to see the quantum and openness defined more precisely where OOLTI will be reprovided; even if new smaller spaces are of high quality they would not act as a replacement. Suggest refer to quantum as broadly equivalent proportions to the existing OOLTI. Same principles in terms of openness. The timing of re-provision should be controlled, so on a major scheme it is not only re-placed in the last phases, and defined in the policy. • A comment concern at the re-provision of the OOLTI on the Brewery site as question the quality, character and biodiversity of the reprovioned space. • <i>See the HBF comment on Policy 10 which raises protecting large swathes of the borough including as OOLTI is unjustified given the documented housing problems.</i> • A comment of support for the green at Ellerman Avenue becoming OOLTI. Funding has been received to “wild” up the green which has resulted in a small wildlife rich area. 	<ul style="list-style-type: none"> • It is not considered necessary to amend the criteria for designation; as this policy is to safeguard open land of local importance. • It is considered further definition for the re-distribution of OOLTI is not necessary, as it will be context specific. • Note the support for the new OOLTI at Ellerman Avenue.
Policy 37. Public open space, play, sport and recreation	

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| <ul style="list-style-type: none"> • The Royal Parks welcome the policy states public open space, such as Bushy and Richmond Parks, will be protected. Welcome provision of new open spaces as part of new development which could mitigate potential increases in visitor numbers to existing parks. • Sport England refer to the updated guidance on planning for sport and note the Playing Pitch Strategy adopted in 2015 is being kept up to date and support the update being considered. Their new Strategy 'Uniting the Movement' is about the big role of sport and physical activity in improving physical and mental health, through connecting communities and active environments. Wish to ensure the choice to be active is easier and appealing for everyone, and would welcome a reference to their design guidance on 'Active Design'. • Sport England support the clear protection for sport and recreation facilities in line with the London Plan and NPPF. Welcome the requirement for early engagement with Sport England for development affecting playing field. Welcome the aspiration to secure community use agreements in order to ensure that private sports facilities meet the wider needs of the community. • Sport England comment for any future site allocations, sites for sports facilities should be identified through a robust evidence base such as the Playing Pitch Strategy. The NPPF states it is important to ensure the right facilities in the right place. Essential that where sites adjacent to playing fields are redeveloped the new use does not prejudice the use of the playing field. Note the aspiration open space delivered as part of housing developments and mentioned in several site allocations; request for major developments the evidence base for support determines whether on-site sports facilities may be appropriate. • FORCE are strongly in favour of investing to improve underutilised open spaces for public and environmental benefit, and improvement to those spaces at risk of excessive wear-and-tear from new development. At a basic level, frequency litterbins are emptied after weekends. When play space is provided in private developments, support expectation for play spaces to be made publicly accessible, and important on-site facilities are maintained. The Council are reluctant to take on responsibility for new green and open spaces through planning gain or its own estate; a missed opportunity for significant public benefit and note the Twickenham Junction Rough has provided a major public | <ul style="list-style-type: none"> • Criteria at paragraph 21.27 has been imbedded into the policy to ensure existing open space is protected from development. • The updated Richmond Playing Pitch and Outdoor Sports Strategy is anticipated to be finalised in 2023 and will operate alongside the Local Plan to inform decision-making. • Policy 37 explicitly requires new major developments to provide additional open space, as well as improving existing space where accessibility in inadequate. • Amend the Policies Map to redesignate the eastern strip of land at Heathfield Recreation Ground as public open space. • Update the Public Open Space Deficiency Areas on the Policies Map, in line with the Open Spaces Assessment 2023, including update to the accessibility standards. • Add reference to Community Use Agreements and artificial grass pitches, given the need to make best use of sites. • Add reference to the Richmond Public Health Physical Activity Plan 2021-2031 and Sport England's Active Design Guidance in the supporting text, giving emphasis to the importance of active environments. • External lighting is considered under Policy 43. |
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benefit. As population grows the benefits of local open space are better understood, and need and value then becomes greater. Propose a specific policy to encourage the Council to take the opportunities for new public open spaces.

- The Mayor of London support references to children and young people's play facilities and note the references to the GLA's child yield calculator, London Plan benchmark of 10sqm per child, and the Mayor's Play and Informal Recreation SPG. Paragraph 21.27 sets clear criteria for the loss of facilities and should be embedded in the policy. London Plan Policy S4 notes the importance of informal recreation and paragraph 5.4.2 highlights the lack of opportunities for children to play in their local neighbourhood; a recognition of informal play would be welcome, connected to the Healthy Streets Approach.
- A comment the policy is not fully evidenced to be justified, although the intention to prepare updated Public Open Space deficiency maps should address this.
- A comment note the Playing Pitch Strategy will be updated in 2022; it is essential Udney Park retains the status granted in the current Local Plan as a strategic site in the provision of playing field capacity at this end of the borough, as demand exceeds supply and all capacity / potential capacity must be protected irrespective of site ownership.
- A comment notes the further sports review to be undertaken in 2022.
- CPRE London comment an area of land at Heathfield Recreation Ground was proposed for a school site and should be added back in and given protected status. More needs to be done to turn 'grey' space to green or community open space.
- Another comment that a portion of Heathfield Recreation Ground was taken out of the Public Open Space designation to allow for the redevelopment of Heathfield School in the early 2000s; now not going ahead the POS removal should be reversed.
- CPRE London believe the Council could demonstrate greater ambition for increasing the amount of green space e.g. new parks in areas of the borough with not enough green space by converting 'grey space' into streetparks.

<ul style="list-style-type: none"> • A comment supporting the reference that, regardless of the type of open space provision, it should be designed with nature conservation and biodiversity benefits in mind. Add about the importance of avoiding artificial lighting in order to provide dark corridors. • Two comments proposing no changes. 	
<p>Policy 38. Urban Greening</p>	
<ul style="list-style-type: none"> • The National Trust support the policy, as urban greenspace has a proven impact on health and wellbeing, as well as providing environmental benefits. Refer to research on the economic case for investing in green infrastructure. Support for strategic green infrastructure and small spaces that cumulatively can have a significant impact on greening. Support criterion D focus on the climate emergency and biodiversity, and welcome reference to locally relevant greening to add to the identity and connect to the local area. • A comment that only major development need to do calculations – move to something like 5 units or over. A comment all sites should contribute to the greening of streets or local areas. A comment that biodiverse green roofs are needed. A comment that design guidance for houses favour pitch roofs so may need to be altered so more green roofs can be constructed. • A comment that part E should be amended as there is no evidence to justify the 70% requirement which limits space for rooftop amenity, plant/services and is too restrictive. • <i>Virtual event feedback:</i> There were many suggestions to support our urban greening policy: <ul style="list-style-type: none"> • An interest in integrating policy requirements for items like bee bricks and bat and bird boxes. • Proper maintenance and consideration of trees - not just numbers. • Pop up allotments and food growing spaces, using as educational tools. • Desire for sensory planting and areas of wildflowers. 	<ul style="list-style-type: none"> • It is considered that the policy reflects appropriate requirements for biodiverse green roofs and the technical details for floorplates.
<p>Policy 39. Biodiversity and Geodiversity</p>	
<ul style="list-style-type: none"> • A comment support increasing biodiversity and greening the borough and the initiatives in the Plan to support this. Building on greenfield sites tends to offer most provide and more attractive, and trees, hedgerows, wildlife are more likely to be cleared around the time of a land sale destroying complex mature habitats; needs to be more lifecycle responsibility for green sites so initiatives to retain and enhance biodiversity are monitored beyond initial development 	<ul style="list-style-type: none"> • Clarify the approach to blue and green infrastructure, particularly the importance of ecological corridors. • Clarify how back gardens will be protected from development to protect this cumulative key wildlife habitat resource.

plan. Council appears to have limited powers in prevention, even in designated green space and often only aware when too late. Developers demonstrating environmental conscience should be welcomed and responsibility with site owners to evidence ongoing maintenance plans, and take a positive approach to budget to demonstrate impact of development on existing species during and after development, to improve future decisions. Green roofs and walls should be additional measures rather than replacements for existing biodiversity; new habitats are not usually a valid replacement for mature complex habitats. Local opposition to measures less likely to succeed in areas where little finance to hire experienced planning barristers; would welcome any funding to be provided by development companies to ensure adequate representation (similar to party wall disputes funded by the owner wishing to build).

- A comment part B.3 delivering offsite biodiversity value is likely to favour profit over biodiversity, since difficult to predict the impact on other ecosystems connected to the existing site; propose this is removed as an option.
- A comment part B appears to apply less obligations on protecting biodiversity than national and London Plan policy and guidance, narrows the application of the mitigation hierarchy versus its application elsewhere in planning guidance, and is inconsistent with the objectives/principles of the Plan which depend on whole ecosystems and ecological networks – an apparently ‘less significant’ feature may nevertheless play a vital role. Suggest maintain the explicit application beyond designated SINCE sites, as the obligation to protect biodiversity applies even if a site has not been designated. Suggest make explicit the requirement to firstly and wherever possible avoid harm; add as per the London Plan Policy G6 A and C. Even with clear contextual clarification on the mitigation hierarchy, NPPF paragraph 180 must be fully taken into account; it may be helpful to provide explicit clarity on the requirement for adequate mitigation / compensation without which planning permission should be refused (not the same thing as simply achieving biodiversity net gain).
- The Royal Parks welcome the Policy given the SSSI designation of both Richmond and Bushy Parks and the National Nature Reserve and SAC designation of Richmond Park.

- Clarify the biodiversity mitigation hierarchy in line with the NPPF and London Plan, covering non-designated sites and the additional hierarchy to be applied to SINCEs.
- Clarify the requirements for information to be submitted with applications including for major developments and small scale development.
- Amend the policy and supporting text to refer to the importance of dark environments and the opportunities to maintain these in line with the Biodiversity Action Plan.
- Amend the policy and supporting text to refer to a measurable net gain for biodiversity including the relevant metric and good practice guidance, and the details confirmed following the Environment Act.
- Add to the supporting text the provision of swift bricks is expected at one per dwelling.
- Update the supporting text to refer to locally important geological sites.
- It is not considered appropriate to make further detailed changes including reference to buildings-based species, or requiring the submission of ecological data to GiGL.

- The Royal Parks welcome the Policy and the protection and opportunities it offers for enhancement of designated sites and green corridors. *See also comments on Appendix 4 in relation to proposed SINCE extensions.*
- FORCE welcome commitments to protect and enhance biodiversity and geodiversity and protecting ecological or wildlife corridors from development. Favour an approach that starts by recognising biodiversity potential of a site rather than its current biodiversity status as the relevant baseline from which to evaluate genuine biodiversity net gain, and trust that this approach will inform the upcoming SPD. Trust the new SINCEs will be implemented (whether or not the population increases as forecast) as will make an important contribution to countering the Climate Emergency and improving physical and mental health of existing residents.
- A comment there is little mention of geodiversity. There is a proposal to include the landforms and Pleistocene deposits of Richmond Park into a new Geodiversity area.
- A comment the requirement for 20% Biodiversity Net Gain goes beyond Government requirements or the London Plan, and a Whole Plan Viability Assessment has not been published. The cost of BNG must be allowed for in the forthcoming Viability Assessment; presently the policy is not justified and unsound.
- The Port of London Authority welcome references in part A.4 to the need for development to deliver measurable net gains for biodiversity by incorporating/creating new habitats/biodiversity features, and part 5 which requires at least 20% BNG. As part of this it should be noted net gains in biodiversity can be achieved in and alongside riverside areas as well as on land. Note the future SPD and the PLA requests to be consulted. Suggest amended wording for A.4 to reference green 'and blue' links.
- The National Trust supports the Policy; everything must be done to prevent the decline in biodiversity. The National Trust is committed to creating 25,000 ha of new wildlife habitats by 2025 to provide more opportunities for nature and people to connect to nature; recognise multiple small and local actions that enhance and improve biodiversity add up. Support A.5 which requires a minimum 20% biodiversity net gain and appreciate this target is one of the

more ambitious within the region. Support part C which positively supports proposals that will reduce deficiencies in access to nature and green space. Aligns with our values and the NPPF.

- A comment raise concern the 20% biodiversity net gain requirement will be unfeasible. It is twice the requirement sought through the Environment Act 2021; it is unsound and should be amended to reflect the requirements of the Environment Act. Site Allocation 5 should be amended to refer to 10% BNG (*see also comment on Site Allocation 5*).
- The Environment Agency welcome blue-green infrastructure, biodiversity and rivers are all covered in separate policies and the ambitious policy for 20% Biodiversity Net Gain set on most types of new development. A third of the borough's land is parkland or green open space, and policies recognise the importance of this to the borough's unique character. *See also comment on Policy 34 which links biodiversity value and Policy 39 with green and blue infrastructure. See also comments on the Strategic Objectives and Policy 3 which seek to expand on the link between the climate and biodiversity crises.*
- The Environment Agency are pleased to see an ambitious policy for 20% Biodiversity Net Gain to build on requirements in the Environment Act. Much of the secondary legislation and guidance is still under consultation before the requirement becomes mandatory in 2023, including expanding the metric to consideration of marine (sub-tidal) biodiversity and which types of development will be included; recommend the policy remains flexible so can be applied in conjunction with and compliment the mandatory net gain requirements. Note householder development is included in the Policy requirement and consideration should be given whether DEFRA metric 3.0 is appropriate; Natural England have developed a Small Sites metric which may be applicable. The policy should include a demonstration the requirements are consistent and proportionate to the size of development proposals and any potential impact on biodiversity. In point A the biodiversity value of rivers should be acknowledged, as some of the biggest assets and opportunities to enhance them should be sought; the links between biodiversity, climate change, food risk, and the Water Framework Directive should be made. Clarity of point A.5 would be improved if changed to 'provide a measurable 20% net

gain for biodiversity, in line with the DEFRA metric 3.0 or latest available version'. Policy should also include a requirement for developers to demonstrate how they have followed the mitigation hierarchy and demonstrate they have followed CIEEM BNG good practice. The rivers section of the DEFRA Biodiversity metric penalises encroachment within 10m of top bank, so providing a 10m buffer zone would help sites with a riverine element (requested a 8m buffer zone from fluvial main rivers so if extended) synergise well with BNG requirement. Note intended SPD and appreciate some comments could be explored in more detail in this.

- A comment welcome parts A.2 and A.4 and paragraph 21.66 for their requirement to provide integrated nest boxes, in accordance with the London Plan and the NPPG, and welcome encouragement for swift bricks as a universal nest brick which benefits a range of birds. Request a requirement for nest boxes to be installed in accordance with CIEEM best practice guidance with regard to recommended densities (1:1 swift bricks to residential units, and one swift brick per 6sqm of façade on commercial buildings).
- A comment paragraphs 21.66 and 21.70 relating to swift bricks are a welcome implementation of London Plan Policy G6 item B4, and the reference to universal nest bricks is welcome representing the latest guidance from NHBC and CIEEM. However important omission is these should be implemented in accordance with best practice (RIBA, CIEEM, and imminent British Standard), on average one nest brick per dwelling. Note Brighton & Hove Council go beyond this requirement.
- A comment the requirement to provide data to GiGL is in the current Local Plan, but is largely ignored by developers despite its promotion as good practice, and understand the Council has no means of enforcement. Suggest include a requirement in paragraph 21.67 that all ecological data must be submitted to GiGL at the same time any ecological survey is submitted; any planning application cannot be accepted under this requirement has been fulfilled (this accords with CIEEM guidance which clarifies the whole dataset should be available on request).

<ul style="list-style-type: none"> • Habitats & Heritage comment it needs to be compulsory for developers to lodge with GiGL all data collected during ecological surveys, enforced through planning conditions or some other way. • A comment paragraph 21.67 is welcome but does not clearly consider the impact on buildings-based species of bat and birds; suggest wording to add reference to including buildings-based species. • A comment that biodiversity net gain should include a time factor – in ensuring displaced species are displaced to suitable nearby habitat and not eliminated. Also a requirement to demonstrate actual net gain over a period of several years, not purely an intention to create which fails due to poor implementation e.g. tree planting fails or ‘lip-service’ placement of bat boxes. • A comment requesting some specific commitments to retaining and increasing areas of darkness in and around features with known/likely biodiversity value or which have the potential to act as nocturnal wildlife corridors should lighting be reduced or removed. Richmond Bat Species Action Plan Steering Group’s recommendation would be to exclude the introduction of street lighting, waymarking lighting on key dark habitats primarily (but not limited to bats) in these areas including restrictions of light pollution from developments adjacent to the key nature reserves and habitats: Ham Lands, Ham Avenues, Ham Common, Ham Common Woods, Petersham Common, Terrace Gardens, Ham and Petersham towpath, Kew towpath, The Old Deer Park, Barnes Common, London Wetland Centre, Richmond Park, Bushy Park, Barnes Towpath, Home Park, Barge Walk (towpath Home Park), Marble Hill Park, Corporation Ait, Flower Pot Islands, Petersham Meadows, Petersham Lodge Woods, The Copse, and Glover’s Island (Petersham Ait). • <i>See also comments on Appendix 4 in relation to site-specific designations of Richmond SINCs and Candidate SINCs.</i> 	
Policy 40. Rivers and river corridors	
<ul style="list-style-type: none"> • River Thames Society note the Council is proud of the river-related industry, but the last remaining working slipways are at risk (at Platts Eyot and Eel Pie Island). Only rigid planning controls can protect these and the Policy needs to be worded more strongly to protect these and other river-related uses, many of which struggle to compete with alternative uses on strictly financial criteria. 	<ul style="list-style-type: none"> • Part F of policy 40 clearly states that the loss of river-dependent and river-related uses will be resisted, this includes slipways and therefore no change is proposed. • additional wording is added to reflect that public access to the riverside should be accessible at all times.

River-related uses should be for the benefit of the general public. Policy 47 on the use of the river for transport depends on the continuation of river infrastructure, as well as working boatyards with slipways also means wharves and landing stages.

- River Thames Society comment any public access which is secured is genuine and free for all at all hours, not conditional and limited at the discretion of the developer/riparian owner; this prevents the creeping privatisation of what should be public space.
- Richmond CVS suggest the Plan could think about the neighbouring boroughs' development on the borough borders and ways of working cross borough to gain benefit along the length of the river that flows through it.
- FORCE comment the Policy is presented largely with reference to the River Thames, and believe many of the ambitions and protections proposed would be equally applicable to the River Crane. The Crane has more scope to add marginal value in terms of amenity and public health benefits; the Council as a major riparian owner should have scope to influence development outcomes. Welcome the recognition in paragraph 21.89 to the aim of creating a metropolitan park incorporating river restoration works along the lower Crane, and the explicit linkages to relevant Site Allocations. Support the requirement to enable public access to the riverside environment and would like this extended to the Crane and all feasible sites, at all times of the day and night, while protecting the river corridor from light and noise pollutions. Strongly support the requirement for an 8m buffer zone.
- A comment Port Hampton Estates Ltd generally support the provisions of the policy, but consider that it needs to address the situation where site specific conditions may preclude meeting all or some of these objectives; alternatively this could be addressed in the text/policy for Platts Eytot.
- A comment pleased to see reference to the Thames Policy Area and the special character of the reach set out in the Thames Landscape Strategy and Thames Strategy (latter should add 'Kew to Chelsea'). Interested to know what the Local Plan has to say about the GLA's Green Grid Study (2016) which showed the whole section of the river in the borough as 'Arcadia'. Paragraph 21.84 should include reference to the groundwater hydraulic flow systems and where they

- In response to CVS' representation, the Council works closely with neighbouring boroughs, partner organisations and stakeholders through for example strategies such as the Thames Landscape Strategy etc.
- FORCE's ambitions are already covered in the policy as well as in paragraph 21.89.
- In response to Port Hampton Estates Ltd, it would not be appropriate to refer to site specific circumstances or conditions as the onus will be on the applicant to demonstrate and set out why criteria cannot be met.
- The Thames Strategy will be correctly referred to as "Thames Strategy (Kew to Chelsea)".
- The detailed requests for technical groundwater flooding matters are already sufficiently covered elsewhere in the Plan.
- A reference will be added to exploring opportunities to improve accessibility between different areas of the borough that are separated by the borough's rivers, such as between Ham and Twickenham.
- The Port of London Authority's suggestion on strengthening suicide prevention measures is agreed, and wording in relation to appropriate drowning prevention measures is added to Part D of the policy as well as to the supporting text.
- A reference is added to support initiatives to de-culvert rivers where it is feasible and practicable to do so, with a reference to the Council's Surface Water Management Plan, which outlines this measures as generally not suitable for constrained or heavily urbanised areas.
- The comment on requiring access to and a public footpath along Longford River is noted; some of this is addressed in Policy 47 around the GLA's new requirement to set out a full network of walking and cycling routes.
- Part A of the policy will be amended to take account of the Environment Agency's (EA) requests. In addition, the supporting text will be amended to refer to Policy 8 in relation to the set back requirements for rivers as well as including a reference to creating buffer zones that support green infrastructure networks and reduce light spill into the river. A new paragraph is added to reflect the EA's comments on barriers to fish movement.
- Add to the supporting text to clarify the remit of the Marine Plan and the Marine Management Organisation (MMO).

intersect particular aquifers can be a zone of particularly sensitivity, which need careful mapping and control of any building work, especially basements.

Paragraph 21.87 about the network of linked waterways should refer to barriers to movement and need for expensive bridges and ferries.

- The Port of London Authority in principle welcome the Policy, predominantly unchanged from current policy. To strengthen the policy recommend contains a specific reference to the need for development proposals adjacent to the riverside to consider appropriate suicide prevention measures, such as CCTV and appropriate fencing/edge protection and signage, in line with the PLA's guidance and the Tidal Thames Water Safety Forum Drowning Prevention Strategy. Suggest adding reference to part D.
- A comment need to map covered rivers and seek redevelopment proposals to see that they are restored to a natural uncovered state. Ones run through Fulwell Bus Garage, Kneller Hall and Twickenham Stadium. The Council should explore options to open up Longford River to more public access.
- The Environment Agency suggest could promote the link between protecting and enhancing river corridors for design reasons as well as biodiversity and flood risk benefit. Suggest update part A to incorporate the multiple benefits that can be achieved.
- The Environment Agency comment all waterbodies are failing to achieve 'good ecological status' or 'good ecological potential' and development needs to address this; the policy should acknowledge the need to bring into good ecological status/potential. Note requirement for set back is in Policy 8, but could sit under this policy; Part F. should be corrected so it is in line with Policy 8 or expand buffer zone requirements to a subsection of the Policy. Undeveloped buffer zones have multiple benefits, and suggest additional wording and would welcome a separate advice note on watercourses, including on the design of new riverside development (and the inclusion of buffer zones); landscape design of the riverbank; public access; surface water run-off and the avoidance of pollution and weirs/barriers to fish passages. (*see comment on Policy 8*)
- The Marine Management Organisation note paragraph 21.88 which means there is an overlap with terrestrial planning which could be referenced, with the

• The CVP only endorses FORCE's formal response, which is already addressed elsewhere.

• Policy 40 sufficiently addresses the points raised in relation to Mereway Day Centre site allocation.

• A definition has also been added to the glossary to clarify the remit of the Marine Management Organisation (MMO).

<p>benefits of working with the MMO, and ensuring the policies do not conflict through referencing specific and relevant marine plan policies. Ensure correct reference to the South East, South, and East marine plan areas where included. Refer to a webinar on the South East Marine Plan Implementation Training.</p> <ul style="list-style-type: none"> • See general comment of the Crane Valley Partnership endorsing comments of FORCE and reinforcing the Colne and Crane Valleys Green Infrastructure Strategy which identifies a range of river corridor enhancement and active travel opportunities, with the need for a coordinated approach to river corridors. • See comment on Site Allocation 14 in relation to development adjacent to the river. 	
Policy 41. Moorings and floating structures	
<ul style="list-style-type: none"> • A question how the Council will deal with requests to use riverside structures for different purposes; likely to be increasing pressure for greater commercial use extending further towards Petersham. • A comment part C includes important principles and the Council needs to follow through with enforcement action when the existing rules appear to be being flouted. Harsh words appropriate in relation to planning transgressions, most particularly for floating structures purported to be for wider benefit for the community but this cannot be demonstrated. • The PLA support the principle unchanged from current Policy LP19. The supporting text states the Council has limited powers regarding the appearance of boats and therefore recommend further justification is required for inclusion of the policy wording (replacement houseboats should not harm the character of the river). • The Environment Agency support the presumption against new houseboats but suggest part A wording is updated to say ‘no new proposals for houseboats’ to strengthen argument against any new or extensions to houseboats. • The Environment Agency comment applications for new and replacement moorings and floating structures invariably involve sheet piled bank protection methods and result in shading of the river. Policy should discourage the use of hard engineering approaches to riverbank protection where possible. • Elmbridge Borough Council would welcome sight of the evidence base that supports the approach to resisting new proposals for houseboats. EBC has 	<ul style="list-style-type: none"> • Provided more clarity regarding the application of criteria B of the policy, including in the supporting text at paragraph 21.102. • Emphasised the importance to protect the biodiversity of waterbodies in the policy and the supporting text. • MOL designation heavily restricts development along the river to water-based activities such as sport and recreation and would protect against changes of use that would conflict with these uses. • Planning Enforcement is a discretionary function of the Council and appropriate action is taken in line with the Council’s Planning Enforcement Policy and the NPPF. • ‘Presumption against’ is a strong policy position, and the supporting text in paragraph 21.101 further outlines potential negative impacts of new development. The wording provides limited flexibility for potential exceptional cases otherwise not captured by the policy. • New housing development is inappropriate development on MOL and so a more flexible policy would undermine this designation. As noted above the policy provides limited flexibility for potential exceptional cases. The Council’s research has considered riverboat dwellers.

<p>recently assessed the housing needs of boat dwellers on the River Thames in Elmbridge and found there is a need for 10 additional moorings.</p>	
<p>Policy 42. Trees, Woodland and Landscape</p>	
<ul style="list-style-type: none"> • The Woodland Trust in general welcome the policy. Recommend strengthening part B.2 on ancient woodland to include minimum 50m buffer, and make clear applies to ancient and veteran trees outside woods as well as the full range of ancient woodland habitats. Recommend strengthening part B.5 requirement to replace lost trees on a greater than 1:1 basis, to increase the canopy cover in line with biodiversity net gain requirements, using a ratio based on their guidance. Recommend strengthening parts B.6 and C.3 with preference to UK & Ireland sourced and grown tree stock. • A comment that there is a gap in planning policy on protection of hedgerows which are important in an urban setting for supporting biodiversity, and could be given prominent and explicit protection within the Local Plan. Suggest for example clarifying existing hedgerows will be protected in part A and that conditions will be used to protect hedgerows in part C. • <i>Virtual event feedback:</i> There were also concerns about tree removal and the level of protection given to trees in policy. 	<ul style="list-style-type: none"> • Reworded criteria A to provide further clarity regarding what the London Plan policy G7 requires. • As there is no ancient woodland within the Borough, criteria B.2 was reworded to make reference to historic parkland as suggested by the Woodland Trust. • Included more explicit support for hedgerows in the supporting text and linked this to the Council’s biodiversity objectives. • Included more explicit support for increasing the Borough tree canopy cover in line with wider London Plan objectives. • Referred to the proposed Tree Planting Strategy being prepared by the Council’s Tree team.
<p>Policy 43. Floodlighting and other external artificial lighting</p>	
<ul style="list-style-type: none"> • FORCE raise concern at the presumption floodlighting of sports pitches will be permitted unless there is demonstrable harm, as this can be very difficult to demonstrate e.g. species may have abandoned spaces. Oppose floodlighting of College Field and Moor Mead Park in the River Crane corridor, and the lighting of any path along the River Crane or Duke of Northumberland’s River. Council should adopt a policy that recognises and protects the value of dark corridors through the borough as important for wildlife. • The National Trust supports the policy; aligns with the NPPF requires new development to take account of light pollution. Welcome criterion D.1 as light pollution can have a significant adverse impact on the historic integrity of historic building. • A comment that within a biological context the body of evidence for artificial light causing harm is extensive, and disturbance of nature often causes harm. Current Ecological Impact Assessment guidelines are clear a precautionary 	<ul style="list-style-type: none"> • The wording of Criteria A has been altered to put emphasis on the need to demonstrate there should be no unacceptable harm, and to clarify how this should be justified in an application. • The wording of paragraph 21.114 has been altered to ensure that any likely harm is considered in the context of Criteria D. • Added a reference in the supporting text to the importance of dark environments, and to the Institution of Lighting Engineers Guidance Note for Bats and Artificial Lighting. • Dark corridors are not formally identified in the Plan as not considered practicable – not being a national or London Plan requirement, given other designations for open space and biodiversity, and as generally difficult to achieve in urban environments; may be opportunities to maintain dark night-time corridors/refuges in line with Plan priorities and the Biodiversity Action Plan.

approach to evaluation must be applied, thus it is appropriate to assume a significant effect where artificial light may impact on biodiversity. NPPF includes no presumption in favour of floodlighting. Issues are the policy and supporting text do not apply the appropriate standard, and appears to place the burden of proof on the Council, rather than requiring the developer to submit enough information to fully consider the effect on protected species and their habitats. Any presumption in favour is contrary to trends in understanding how artificial light harms biodiversity, efforts to maintain dark corridors and decrease harmful light pollution. Suggests detailed wording to apply a precautionary approach.

- A comment that improvement of existing lighting installations should be considered against the appropriate 'baseline' to avoid temporary installations being used as a way around this policy.
- Habitats & Heritage comment the policy is not adequate to protect biodiversity. Reword part A to put the onus on developers to carry out a full assessment to demonstrate there will be no harm. Part E is open to abuse as it is not clear how long the lighting being replaced needs to have been in use.
- The Environment Agency comment rivers and river corridors should be free from direct lighting to minimise impact on nocturnal animals. All artificial lighting should be directional and focused with cowlings to reduce light spill, refer to the Institute of Lighting Professionals guidance. Where floodlighting is likely to result in light spill into the river corridor, a luminaire schedule should be submitted and a bat survey carried out.
- A comment the emphasis is the wrong way round, floodlighting should not be permitted unless it can be shown that there would be no harm to biodiversity.
- A comment part A feels weighted in favour of floodlighting that is far from essential; harm is not easily demonstrable. Applicant should set out the actual need for lighting.
- Sport England welcome policy considers the positive benefits of sports lighting and reference to their guidance. Newer forms of LED lighting less problematic in terms of light spill and timing can be automatically controlled.
- A few respondents noted no comments on this policy.

Improving design, delivering beautiful buildings and high-quality places

Policy 44. Design Process

- A comment noting the quality of design is itself subjective, although underpinned by policy and guidance, and by the Urban Design Study. It is good to see the Design Review Panel formally included as part of the process. This policy would sit better in the section on Local Character and Design Quality.
- A comment that it is not clear how proposed developments will be judged to determine whether they are beautiful or not, which is subjective. Applications are validated that do not provide sufficient information on judging sensitivity to the surrounding area – all applications that potentially affect the street scene should include before and after street scenes of the development and its surrounding properties, perhaps 3D representations, and this requirement can be mandated in the Plan.
- Two comments the reference in part B to the design guidance for the relevant character area in the Urban Design Study should be omitted insofar as it refers to Tall and Mid-rise Building Zones for Richmond and Richmond Hill.
- The CCG suggest Public Health should be involved in the local design coding process (*see comment on Policy 28*).
- A comment whether it is possible to meet part C as pre-applications do not have any timescale for assessment, especially for smaller projects and household developments can be time wasteful, and the guidance can be overturned at formal application. The previous duty planning officer system was a better way of getting feedback, please reconsider reintroducing a meeting.
- *Virtual event feedback:*
Some responses to the meaning of ‘good design’:
 - Materiality – detailed proposals at ground floor where live or interact.
 - Contemporary better than pastiche.
 - Should ideally promote a sense of connection with surroundings and the area.
 - Bring people together in communal spaces and encourage a sense of community.
 - Ideas to improve design quality focused on function, longevity, connection and sustainability.A requirement to consider the lifespan of material choices during planning, for example timber cladding, was also suggested. Concerns were raised about implementation and monitoring as being a barrier to design quality. There were also caution about expecting the planning process to do too much.
- Minor rewording of the policy and supporting text to enhance clarity of the policy requirements.
- Additional bullet to main policy added on fire safety requirements during design stage, plus an additional paragraph in the supporting text.
- Supporting text on community engagement expanded to clarify expectations and reference draft ‘Raising the Bar’ guidance.
- Rewording of Part C to reference strong encouragement of developers engaging with pre-app, rather than ‘it is recommended that all planning applications receive pre-application advice’, to change the nuance of the expectation slightly given that there will be circumstances where pre-app is not necessary (fully policy-compliant minor householders eg).
- No amendments to the position/numbering of the policy in the Local Plan, which is considered to be logical and appropriate.
- No amendments to policy to stipulate what ‘beauty’ is, given that good design is subject to a number of factors which are often site-specific.
- No amendments to require CAD streetscape visuals for all applications, as a blanket approach is not considered appropriate given that such visuals would not always be essential to make a planning judgement on the acceptability of an application, and streetscape visuals are already required within the Local Validations Checklist for infill developments.
- No amendments to reference to Urban Design Study, as this would be relevant to all applications, including Tall and Mid Rise Building Zones and applications in Richmond and Richmond Hill.
- No amendment to stipulate involvement in local design code process, as this is not a direct comment on the Local Plan / policy.

Policy 45. Tall and Mid-Rise Building Zones

- The Royal Parks raise tall buildings around the Parks can have a significant impact on their character; welcome protection of views and vistas towards heritage assets and the protection of parks.
- A concern that mid-rise buildings may be permitted outside the zones, as once developments such as Homebase are built proposals in the vicinity will use that to argue for compliance with part C.
- Historic England support the policy and provides appropriate criteria to positively manage the conservation of the historic environment and consideration of local character. Reinforces that higher densities can be delivered through mid-rise development. Minor comments on where the policy could be improved – avoid harm to vistas and views, and a key or explanatory text to the maps with colour gradients in Appendix 3.
- FORCE would like to see the same criteria applied to the River Crane where appropriate as applies to tall and mid-rise building near the River Thames frontage. There are no tall building zones within the Crane and DNR corridors, and the only mid-rise building is The Stoop, and would oppose any further designations as higher density development has disproportionate impacts on adjacent open space. Committed to protecting vistas in open spaces; tranquillity and escape is compromised by visual intrusion, and the absence of such should be a public benefit.
- A comment this policy would sit better in the section on Local Character and Design Quality.
- Royal Botanic Gardens Kew request further information and justification on the heights for the zones in proximity to Kew Gardens, including F1 (Richmond Station), F3 (North Sheen), and G3 (Kew Retail Park). Strongly against any development that would have an adverse impact on the WHS. Suggest wording is amended to ensure a maximum height, and only appropriate where fully justified through a tall building assessment. Support A.5 supported by graphic 3D modelling, including Accurate Visual Representations and lighting assessments, and wish to be consulted on any future planning applications for these sites.
- Additional paragraph added to Appendix 3 to clarify the colour coding for the heat maps and to refer to the explanatory text accompanying the mapping in Section 4.6 of the Urban Design Study.
- An amendment to include ‘and their setting’ to the reference to heritage assets in Part C2 of the policy.
- Amendment to the Urban Design Study to add additional bullets to the negative qualities section for Kew Residential.
- Additional text added to the Kew ‘sensitivities’ section in the Urban Design Study to reference character and views to/from the River Thames, landscape and open spaces, surrounding low rise houses, Ruskin Residential & Defoe Avenue Conservation Area, wider context of the Royal Botanic Gardens Kew World Heritage Site, and the setting of/views from opposite the river bank within LB Hounslow.
- Removal of reference to Kew Biothane as a consented tall building, as it does not meet the definition.
- Amendment made to text within Appendix A justifications section in Urban Design Study to clarify the scenario testing on Kew Retail Park site included a range of heights up to 9 storeys, rather than just 9 storeys.
- No amendment to text which states that there may be some circumstances where mid-rise buildings will be considered appropriate outside of designated zones. Part C of the policy sets out the circumstances and a criteria which development must meet. The policy wording is considered to be sufficiently robust to protect the borough against inappropriate mid-rise development.
- No amendment to requirement to ‘respect’ local context, as ‘respect’ is used throughout the Local Plan with regards to design and is not considered to be ambiguous.
- No requirement to reference the River Crane and Duke of Northumberland River in the same way as the River Thames in the policy. The River Thames and Thames Policy Areas are specifically referenced in the London Plan and thus it is appropriate that development near this river has its own section in Policy 45. There are no tall building zones directly adjacent to these subsidiary rivers and any such development would in any case need to comply with the requirement

<ul style="list-style-type: none"> • RFU suggest revised wording for Part A as recent case law confirms tall buildings can be acceptable outside zones provided they meet London Plan Policy D9.C, and the portion of Site Allocation 13 to the north of the stadium is less sensitive in townscape terms and should be included in Appendix 3 (see comment on Site Allocation 13 on the Urban Design Study and that the stadium merits its own character area; and support acknowledgement of areas more able to accommodate growth and change and would support an approach to stepping down in massing as suggested). • The National Trust support the policy including to prohibit tall buildings outside of the identified zones. As landowner for Ham House, support A.1 and C.2 with regard to heritage assets. Suggest strengthen C.2 to reference heritage assets and their setting. • London Square comment the Greggs site (landowner) is not included in locations for tall or mid-rise development, and the refused application proposed a mix of building heights rising to 5 storeys which has been accepted in consideration of the application and the Urban Design Study; the Greggs site should therefore be included as an area suitable for mid-rise development in the Plan. • A comment the policy is too prescriptive and gives no opportunity for consideration of detailed design to influence the extent to which a location is capable of being able to accommodate a tall building, suggest reference to tall buildings will normally only be appropriate in tall building zones. • The Environment Agency suggest part B of the policy should recognise the biodiversity value of setting tall buildings back from the river; proposals for tall buildings close to the river should be submitted with a Transient Overshadowing analysis. • Two comments that the policy should be amended to omit any reference to the acceptability of development above 5 storeys in the character areas F1, F2, F3 and G1 to reflect the maximum height of existing development, with parts of the Urban Design Study reflecting a flawed analysis and appreciation of this area. The claim that tall buildings can make a positive contribution has not relevance at all to the existing urban character of Richmond. 	<p>in Policy 45 that waterways are respected, as well as other policies protecting rivers in the Local Plan.</p> <ul style="list-style-type: none"> • No amendments to incorporate a 'view premium' on residential development adjacent to open spaces/riverways. It is not clear what this would entail. Local Plan Policies 31, 35, 36 and 40 allow for assessment of the impact on open spaces and/or river views. • No amendments to remove Policy 45 as a separate policy. London Plan Policy D9 requires Councils to identify tall building zones and thus it is appropriate that provision for this is via a standalone policy. • No amendments to remove Richmond Station, North Sheen and Kew Retail Park as tall building zones. The methodology underpinning the Urban Design Study, which includes scenario testing of the zones and their impact on the surrounding area, is considered to be robust and sound. • No amendment to Kew Retail Park tall building zone text in the Urban Design Study to reference 8 storeys, as scenario testing showed that heights above this would likely be visible from the World Heritage Site. • No amendment to the policy stipulation that applications for tall buildings outside of the designated zones will not be supported. Policy 45 is considered to be in general conformity with London Plan D9 whilst also seeking to make it specific and appropriate to the borough, having regard to the local environment and evidence, as set out in the Urban Design Study. The approach is considered to give clarity to developers, residents and decision-makers. • No amendment to include Twickenham Stadium as a tall and mid-rise building zone, given the sensitivities of the wider area. • No amendment to include the former Greggs Bakery site as a mid-rise building zone, noting its assessment as having a low probability of change, largely due to its designation as a Key Business Area and Locally Important Industrial Land and Business Park (part of the West Twickenham cluster). Further, the policy does not preclude mid-rise development from coming forward outside of the designated zones. • No amendment to include reference to the ecological value of setting tall buildings back from the river. Part B of the policy already requires buildings to maintain the river frontage as a public resource and to be set back and Criteria
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<ul style="list-style-type: none"> • Two comments concerned at the support for high-rise development at the Richmond Station and elsewhere given the potential for interrupting views/vistas important to Old Deer Park. • A comment opposing designating North Sheen as a location suitable for tall buildings, with an 8 storey building overbearing and visible from Conservation Areas. • St George Plc and Marks & Spencer comment (landowner) the general principles of the Urban Design Study are sound and well justified, and support the need to identify specific locations for tall building development, but are concerned with the lack of detail in the supporting evidence particularly to underpin where tall and mid-rise buildings are considered appropriate. Generally agree with the findings of the townscape character assessment of the area, concerns with its ability to support the parameters set in the Plan. Suggest West Park Avenue is in East Kew Mixed Use Character Area (G3) but is more similar to Kew Residential (G2) and a revised boundary could run along Kew Meadow Path. The valued features for G3 contain repetitions. In the design guidance it is not appropriate to state that tall buildings are to be set in landscape. There is a need for a detailed townscape character assessment. The study fails to identify existing tall building development in the borough, which highlights the lack of a thorough, granular assessment. Tall buildings are capable of being acceptable in areas of lower height, and London Plan Policy D9 allows for such an approach; the recent Hillingdon judgement makes clear tall buildings can be found to be acceptable in areas that are not identified where they meet D9.C and thus the analysis of acceptability should allow for some flexibility. For G3 lack of referent to the Kew Biothane Plant redevelopment. If the supporting evidence was underpinned by a thorough assessment, the sensitivity for G3 would be identified as low, and question the medium probability to change given the site allocations, which would increase the development capacity to the highest rating. Raise a lack of consistency in the definition of a 'tall building' (example of Kew Biothane) and that using scenarios to test appropriateness of tall building zones ignore the importance of viability. It is not necessarily the case that tall buildings require space around them. Sets out detailed comments on the analysis of the Kew Retail Park site, while 	<p>5 of Part F requires the setting back of development from river banks. Matters of ecology and biodiversity can be assessed under Policies 39 and 40 of the Plan. Policy 39 has been amended to reference dark spaces, that are important for some species, and to specifically cite blue links.</p> <ul style="list-style-type: none"> • No amendment to the character area boundaries, which are considered to be logical and have also been subject to public consultation. • No amendment to remove any values qualities for Kew 'place' from the Urban Design Study, which are considered to be sound and appropriate. • No amendment to guidance in Urban Design Study on landscaping and connectivity to the river in Kew 'place', which are considered to be appropriate aspirations. • No amendment to include reference to existing tall buildings in Kew 'place', which are already referenced. • No amendment to reference to Kew Biothane Plant redevelopment in relation to the Kew Retail Park site in the Urban Design Study. Whilst consented developments influence the assessment of appropriate heights, they do not affect the probability and development capacity analysis as set out in the methodology. • No amendment to 'Probability' section in Kew 'place' in the Urban Design Study, noting that other factors also influence probability, including PTAL. The methodology is considered to be sound. • No amendment to the design guidance for Kew 'place' in the Urban Design Study, as it is not considered that there are any conflicts with the guidance set out in the London Plan.
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<p>welcoming the identification able to accommodate tall buildings, suggest a scenario of 8 storeys and the testing of 9 storeys should be made available.</p> <ul style="list-style-type: none"> • St George Plc and Marks & Spencer (landowner) suggest amends to the policy, including deletion of A.10 and C.5, and around the function of the base of buildings in line with London Plan D9. • A comment the Kew Retail Park should be no more than 5 storeys, over the whole site, in keeping with adjacent development. • <i>See also comments on Appendix 3 in relation to site-specific designations for tall and mid-rise zones.</i> 	
Policy 46. Amenity and living conditions	
<ul style="list-style-type: none"> • A comment this policy would sit better in the section on Local Character and Quality. • A comment regarding first floor roof terraces when considering the impact on neighbour amenity and overlooking. The policy references and SPD suggest such proposals will not normally be acceptable, yet the assessment is subjective, and permitted in a specific case. The objecting neighbour is unlikely to afford an appeal, creating an unconscious bias in favour of applicants. 	<ul style="list-style-type: none"> • Add clarification in the policy and supporting text to separate the different types of amenity impact and add reference to noise and plant equipment which can impact on amenity. • Update the supporting text with reference to the Mayor’s latest London Planning Guidance. • Policy 46 replaces Local Plan Policy LP 8, which is a standalone policy. Considered appropriate to include in this theme. • No amendment regarding roof terraces. A blanket restriction would not be appropriate. New development is expected to have neighbouring amenities at the forefront of its design. Where there are likely to be impacts, developers are expected to mitigate these via the design of the development and/or agree to conditions attached to the planning decision. The wording of Policy LP46 is considered to sufficiently make this requirement of developers clear. However, owing to its existing built-up nature, the majority of development in London will have some impact on neighbouring amenities. That there would be some impact does not mean that the effects would be unacceptable for the occupier(s). Further, compliance with the development plan needs to be assessed by reference to the content of the plan as a whole. Thus it does not mean that a proposal which has some unavoidable impact on neighbouring amenities, and where all reasonable steps have been taken to account for this, would warrant overall refusal of the application. • No amendment based on Appeal process and bias. All planning decisions are made in accordance with the development plan, unless other material planning

	<p>considerations indicate otherwise. Planning decisions are based on a planning judgement following an assessment of the scheme. The Appeals process exists for where developers feel that planning permission was refused for reasons that they think go against the development plan. Where an application is refused and then appealed, the Council would seek to defend their reason(s) for refusal on policy grounds and make a case to the Planning Inspector (PINS) on this basis. A costs application would only be granted by PINS where the Council has been found to have acted unreasonably, or caused the appellant unreasonable costs or delay. That these processes exist, and the reasons for them, does not mean that planning officers would have a 'subconscious bias' towards a developer, or any other interested party.</p>
<p>Reducing the need to travel and improving the choices for more sustainable travel</p>	
<ul style="list-style-type: none"> • TfL welcome the aspirations to implement the 20 minute neighbourhood concept, reduce the need to travel and improve the choices for more sustainable travel. Helpful to reference the Mayor's Vision Zero ambition for road safety. Commend adopting London Plan parking standards and encouragement of car free development, however not always reflected in site allocations and text which refers to car parking requirements or needs. Welcome intention to seek contributions towards active travel improvements and enhanced public transport capacity and infrastructure. Welcome safeguarding of transport land, this should be extending to existing transport infrastructure as well as future schemes. As part of the evidence base recommend potential need for borough-wide strategic transport assessment to address concerns about deliverability and useful when considering transport impacts of major sites. • Highways England comment there are no sections or junctions with the Strategic Road Network (SRN) in the borough, although a series of junctions lie just beyond the boundary that could still be affected by development and policies within Richmond (M3 J1 including short section of A316, M4J1 and J2) and interested as to whether there would be any adverse safety implications or material increase in queues and delays on the SRN. Encourage policies and proposals which incorporate measures to reduce traffic generation at source and encourage more sustainable travel behaviour. Require a robust evidence 	<ul style="list-style-type: none"> • Regarding the need for a Borough-wide strategic transport assessment to help assess the cumulative impacts of major developments, the Council strongly encourages applicants to use the pre-application advice service it offers to work with Council and TfL Officers to agree with parameters of any vehicular traffic impact assessment and the tools used to complete this.

base and refer to their guidance. Accept that policies and allocations will have no boundary issues related to the SRN. Welcome the exploration of strategic traffic modelling and expect necessary SRN improvements to have been identified for allocations and tested as part of the long-term Transport Strategy, considering individually and the cumulative Plan impact. It could identify necessary highway improvements as part of the Infrastructure Delivery Plan, so the only consideration as part of a planning application would be phasing of development, with conditions to ensure infrastructure is in place prior to development becoming operational to ensure operation and safety of the SRN.

Policy 47. Sustainable travel choices (Strategic Policy)

- A comment support these policies and note they are well matched with those promoted by TfL. However, note the evidence base does not include any borough-based transport studies. Note developments that would generate high volumes of trips should be focused in PTAL areas 4-6 unless mitigated by bus service improvements; highlights some of the problems arising from the development of the Stag Brewery. Note paragraph 23.12 that safe networks should be created for pedestrians and cyclists and conflicts with deterioration of safety conditions around Mortlake Station and the Council's stance on the provision of local schools. Note the policy protecting local filling stations has been omitted – ask if expecting to be phased out as more cars become electric, where will tyre pumps and car wash facilities be located? There are only two filling stations in the East Sheen Society area and one of them is listed Grade II, question if it will soon become under threat.
- A comment infrastructure plans are needed to larger developments e.g. dangerous traffic congestion along South Worple Way and question how traffic will be managed with new larger development there. Congestion on the Upper Richmond Road at peak times has caused Queens Road to be used to access South Worple Way as a rat run, there is insufficient turning circle.
- Richmond Cycling Campaign is overall highly supportive of the Policy, it includes many positive measures to deliver on the strategic vision enabling choosing to walk or cycle. Suggest a number of improvements. Part B should also refer to improve infrastructure on the cycle network. Part C should also refer to Local Transport Note 1/20 Cycle infrastructure design. Part D ask to confirm if

- Supporting text relating to refuelling stations has been amended for clarity.
- Additional general information about safeguarding for transport schemes and infrastructure has been included in the supporting text.
- The impact of construction traffic on highway safety is assessed as part of any transport assessment.
- Further additional references included in policy to specific cycle design guidance.
- Clarity on references to most up-to-date Inclusive Design guidance.
- Amendment to specify in policy that there is an overall objective to reduce the proportion of trips taken by private car.
- Amendment to specify that major developments must demonstrate how they help to meet sustainable transport mode targets.
- The impact of development proposals on air quality and wildlife habitats and vegetation is assessed by the Environmental Health team and not through the transport assessment process.
- Additional text highlighting importance of high quality, safe access to public transport services in supporting text.
- Agree supporting text should also refer to vulnerable road users.
- River Crane is not maintained by the Council but contributions can be secured as long as they meet CIL Regulations (2021).

'Inclusive Mobility' is referring to Inclusive Mobility: a guide to best practice on access to pedestrian and transport infrastructure; if not please refer to. Paragraph 23.4 add reference to bus and cycle links. Paragraph 23.4 clarify if the Policy intends future improvements are to be implemented before the occupation of new development, as travel habits form early must be implemented before the occupation or use of a new development. Paragraph 23.12 clarify the measures should be applied in all new developments, while the use of modal filters should be considered for addition; reference LTN 1/20 in addition to the London Cycling Design Standards. Paragraph 23.12 the Council should also ensure that signage and waymarking of the sections of National Cycle Route 4 that passes through the borough is achieved, along with other cycle routes passing through borough. Paragraph 23.19 refer to sustainable and active travel.

- TfL support the potential requirement in part B to provide financial contributions towards increased capacity or improved infrastructure. However, public transport capacity constraints may apply in higher PTALs and the wording should make it clearer there is a potential requirement for contributions in all areas regardless of PTAL; the level and type of mitigation will be informed by a multi-modal assessment. Part C could refer to implementing measures identified through an Active Travel Zone (ATZ) Assessment in line with the Healthy Streets Approach. Part H should refer to safeguarding existing transport infrastructure.
- TfL comment on paragraph 23.2 helpful to clarify developments will need to demonstrate how they are contributing to the Council's sustainable transport mode split targets.
- The Royal Parks comment specific reference should be made in this section to the impact of traffic and associated air pollution on designated sites and priority habitats, such as: Richmond Park SAC, SSSI and NNR; Bushy Park SSSI; veteran trees; and acid grassland; and highlight the need for the impacts to be mitigated by measures to reduce traffic in and through such sites and habitats.
- A comment Part C should be made clear that such walking and cycling routes should not obstruct public transport nor adversely affect the safety of those less able (e.g. cycle route running inside a bus stop so that persons alighting a

- London Plan does not have maximum off-street parking standard for coaches and this is therefore discussed on a case-by-case basis. Amendment to part I to specify policy also applies to coaches and public highway should only be used for minimum time necessary for dropping off and picking up and where there is no off-street alternative.
- General reference added to traffic calming measures as Richmond does not have LTN (but it does have a number of school streets).
- Bus garages will be protected unless it is demonstrated they are no longer operationally needed. Policy amended to state this will need to be confirmed by TfL.
- Council's Active Travel Strategy and LIP 3 contain details of the borough's strategic cycle routes and quietways and these documents are referenced in the policy.

bus might encounter cyclists on the pavement). Part D relates to disabled persons but there are many others (e.g. elderly less able but not disabled) who will be excluded by the priority of cycling over public transport which appears to the case in the Plan. Sustainable travel choices should be inclusive and the needs of the ageing population an important consideration relating to travel and the 20 minute neighbourhood.

- Sport England fully support the Policy which promotes a high quality walking and cycling environment, in line with Sport England's own aims around Active Design. *See also comment on Policy 37.*
- FORCE fully support improvements in transport provision for both cyclists and pedestrians, and appreciate commitment to signage and way marking of the River Crane Walk (23.13) and improvements that have been made in recent years. Believe scope for further improvements along the River Crane and DNR that will benefit road traffic management, connectivity and public health. Would like to see improvements to path beside the River Crane to increase clearances for pedestrians and cyclists under Hospital Bridge Road and A316, de-trafficking of Craneford Way between Challenge Court Meadow and Craneford West Field, path through Twickenham Rough during hours of traffic restrictions on RFU event days or ideally unrestricted. Concerned at the in-borough focus of the Policy, when need to consider at a sub-regional level in partnership to deliver cross-borough links. The Colne and Crane Valley Green Infrastructure Strategy 2019 sets out a strategy for enhancing the linkages; the Local Plan would benefit significantly from adopting the Strategy as a strategic objective for enhancing green links as well as committing to specific interventions identified. FORCE is currently engaged with the Crane Valley Partnership to develop the Smarter Water Catchment programme, funded by Thames Water, one of the key elements is to identify the opportunities and blockages to green travel through the catchment and the work is being delivered by Sustrans; hope the Council will engage with the next phase which will seek to prioritise improvement options along the corridor. FORCE have conducted usage surveys for over 10 years at multiple locations along the River Crane and DNR and show the order of magnitude increases in cyclist and pedestrian usage that can follow investment; data and insights can be shared.

- Royal Botanic Gardens Kew note Part I confirms where appropriate taxis, minibuses, coaches and PHVs can be safely accommodated; and comment they have seen a reduction in coach parking in recent years which is unfortunate as it provides an efficient and sustainable way for visitors to major destinations. Support the Policy and request that existing coach parking on surrounding streets is retained and where possible improved. RBK Kew also support improvements in public transport to reduce car trips, however the need for sufficient car parking for visitor and specialist staff needs remains an important part of daily operations.
- Cycling UK comment on Part C cycling proposals should adhere to LTN 1/20, unless physically impossible, as the most up to date specification. Paragraph 23.8 should refer to a network linking people's homes with schools, workplaces, shops and other destinations. Paragraph 23.12 management of other users should include excluding through traffic from residential roads as LTNs; maybe protected lanes rather than segregation. Paragraph 23.13 should also extend to NCR4 in the borough and the local cycle network (if we had one).
- A comment on paragraph 23.11 developments must be permeable on foot and by cycle if appropriate. Paragraph 23.14 promoting new access routes and transport links should not cause consequential harm to the amenity of existing users of the route or nearby residents. Paragraph 23.24 the Plan needs to recognise that taxis and PHVs are increasingly being used to make deliveries from food businesses and dark kitchens; may need to be managed while waiting to avoid bringing harm to other road users.
- TfL Commercial Development comment the policy wording does not recognise that bus operations can be made more efficient and sustainable as part of redevelopment; suggest wording changed to reflect enhanced provision has been made as part of a redevelopment of the site or made elsewhere.
- Mayor of London refer to TfL comments, and welcome references to Active Travel. Welcome intention to safeguard land required for transport schemes, which should also be extended to existing transport infrastructure in accordance with London Plan Policy T3. It will be important the transport chapter identifies the need to secure land for transport and outlines future plans and proposals in line with Policy T3 and the emerging Sustainable

<p>Transport, Walking and Cycling London Plan Guidance (LPG). The Plan should identify walking and cycling networks and any gaps or potential improvements.</p> <ul style="list-style-type: none"> • Ham and Petersham Neighbourhood Forum comment the aims and aspirations of the section are in line with the Neighbourhood Plan and updated in the context of the climate emergency and new London Plan. Important to include that active and sustainable travel infrastructure (part C and paragraphs 23.4 and 23.6) should be installed prior to occupation of new development to enable new residents to support positive habit formation. Ask to confirm if ‘National Design Guide’ is referring to LTN 1/20 or future equivalent. Support reference to Manual for Streets. Ask to confirm if ‘Inclusive Mobility’ is referring to Inclusive Mobility: a guide to best practice on access to pedestrian and transport infrastructure or future equivalent. Suggest the Plan should address increasing issue of car charging cables across pavements which are a trip hazard. Paragraph 23.11 taking into account additional travel demand of development and to support active travel. Paragraph 23.12 clarify new design should meet the London Cycling Design Standards. Paragraph 23.13 support wayfinding and marking of routes; cycle routes should be network and identified by numbers. • Crane Valley Partnership comment generally that the Plan should be informed by the Colne and Crane Valleys Green Infrastructure Strategy (2019) which identifies a range of river corridor enhancement and active travel opportunities in the Borough (<i>see comment on General</i>). • Elmbridge Borough Council support the Policy, though it is unclear what the proposed major developments are as Table 1 does not exist in the document and requires clarification. Whilst Surrey County Council is the Local Highways Authority, welcome direct discussions on opportunities for connecting two boroughs through active travel means. 	
Policy 48. Vehicular Parking standards, Cycle Parking, Servicing and Construction Logistics Management	
<ul style="list-style-type: none"> • TfL comment on paragraph 23.10 when referring to London Plan minimum standards for cycle parking, helpful to add developments that exceed the minimum will be encouraged. 	<ul style="list-style-type: none"> • Policy amended to state cycle parking should be provided at least in accordance with the London Plan standards. • Site Allocations seek to strike a balance between provision of car parking and encouraging active travel and highway safety.

<ul style="list-style-type: none"> • Mayor of London pleased to note the intention to adopt London Plan parking standards and encouragement of car free development in accordance with London Plan Policy T6; also expect to see this reflected in Site Allocations. • TfL comment on paragraph 23.21 welcome safeguarding of bus garage facilities, but should make clear in all cases TfL agreement will be needed to confirm that any replacement facilities are fit for purpose and capable of being delivered, or existing facilities are surplus to requirements. This will need to take into account need for additional space to accommodate alternative fuel facilities. • A comment paragraph 23.25 need to be balanced against the issues of excessive paving and loss of valuable green space and flooding adaptation. • A comment that the borough only grants car-club spaces to the most expensive profit-making car clubs, asks has consideration been given to involve a non-profit making one. Understand they have to pay for on-street spaces at a higher rate and is counter-productive to reducing car ownership and waiving this cost might enable lower fees. • A comment welcome general approach that new developments will not necessarily be associated with right to resident parking. However, should be accompanied by a more radical approach to CPZ parking rather than individual developments being considered in operation. The Council causes a significant problem in my local CPZ X (probably applies elsewhere) as no restriction on number of resident parking badges each household can have, found reoccurring problems as insufficient space for contractors' and delivery vehicles on an occasional basis, suggest a solution; a broader-based approach to parking restriction would make it easier to justify not allowing resident parking for new development. • TfL strongly support the requirement to provide cycle and vehicle parking in line with London Plan policies and standards, including reference to London Cycling Design Standards. Where parking is provided, a Parking Design and Management Plan should be submitted with the application. Welcome part F encouragement of car free developments in PTAL3 or above. In F5 where CPZs are not already in place it would be appropriate to encourage developments to provide funding towards implementation of a new or extended CPZ (or equivalent controls). In F8 and part I it may not be appropriate to require car 	<ul style="list-style-type: none"> • Policy amended to state developers must secure an accredited car club operator. • Policy sets out circumstances in which an applicant will need to complete an on-street parking stress survey to support their case as to whether occupants should be included in or excluded from a CPZ. • Note TfL support for consideration of car-free development in PTAL 3 or above. Council's view is that developers should continue to provide access to car club vehicles in areas with a high PTAL as they help to reduce car ownership by providing residents with use of a car when they need it. • Council does not want to encourage provision of disabled parking by developers on street through the policy. It will continue to be considered on a case-by-case basis where developers are seeking to demonstrate there is no alternative. • Policy has been amended to refer to developers contributing to cost of providing cycle parking off-site. • London Plan does not specify a requirement for cargo and non-standard cycles. The policy references London Cycle Design Standards where 20% of spaces should be for large bikes. • Electric vehicle charging points for vehicles should be on-site wherever possible. The policy has been amended to state provision should be in such a way that ensures the development is safe for other road users. • Cycle parking should be well-located and close to the pedestrian entrance of the main building. The policy has been amended to state it should be easy to use by people of all ages. • Car free developments may be appropriate in areas with a PTAL of 3 or above, and the list of criteria in the policy will also apply. • Additional references to guidance on servicing and refuse collection have been added to the supporting text of the policy.
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club spaces in developments in areas of very good connectivity. In part G may be a need to consider on street disabled persons' parking spaces on constrained sites otherwise suitable for car free development. In part H where there is no physical possibility of accommodating short stay cycle parking on site, on street provision may need to be considered as set out in paragraph 23.35. In part L helpful to refer to TfL guidance on Delivery and Servicing Plans. In Part M it would be helpful to refer to Construction Logistics Plans rather than Construction Traffic Management Plans, to ensure consistency with London Plan and TfL.

- Richmond Cycling Campaign overall support the number of positive policies for improving on and off street cycle parking provision, as well as reducing car dominance. While understand the need for compliance with the London Plan, should explore options to further reduce the number of motor vehicle parking spaces provided with new development, as well as allow for provision of a greater amount of off and on street cycle parking, including replacement of on-street car parking with secure cycle parking. Suggest a number of improvements. Part A refer to the impact and use of car-based travel. Part B refer to provision for cargo and non-standard cycles. Part B clarify electric car charging points must be done in a way that is not detrimental to the safety of vulnerable road users, avoids unnecessary street clutter, does not detract from pedestrian, cycle or wheelchair user amenity, and wherever possible are provided on the highway not the pavement. Part C clarify the meaning of "well located" cycle storage, must be more easily accessible and convenient than car storage i.e. next to the building entrance, safe, secure and easy to use by people of all ages and abilities. Part F the deletion of points 4 and 5, or the increase of on-street parking stress permitted to a significantly higher than 85%. Continued provision of additional parking spaces (on or off street) perpetuates the dominance of motor vehicles (cars parked around 95% of their time); car free developments an excellent way to discourage car ownership). Part H refer to provision of lockable on-street cycle shelters. Part I car clubs are a positive measure, but only if deployed at scale, otherwise only ever remain a supplement to owning a car. Paragraph 23.25 delete last sentence (referring to on-site parking). Delete paragraphs 23.27, 23.28 and 23.29 (referring to CPZs).

Paragraph 23.35 delete reference to local support for the Traffic Management Order as illogical that public opinion gathering exercises are to be carried out for installation of cycle hangars, especially if cost is covered by a developer through S106.

- A comment the use of electric vehicles requires parking and no acknowledgement of this is made as a separate matter of parking and electric vehicle parking is included in the required reduction of all vehicle parking; this seems inconsistent – air quality improvements must occur, charging facilities must be provided, but question where are they to park. Part E car free developments but PTAL3 is only moderate , surely car-free developments should be considered where there is good public transport PTAL4 at least. Part F.4 new developments preclude residents from CPZ permits but outside operational hours so increasing parking stress for residents in the CPZ. Realistically people do use cars and increasingly households have on-line deliveries of goods which do not seem to be addressed. Creating car-free major developments may increase congestion, parking stress and difficulties for residents; this may detract from the Living Locally concept and a more realistic approach could be indicated.
- A comment support these policies.
- A comment car-free developments are only mooted for PTAL3 and above but not everyone owns a car and its not fair to make people pay for car parking they don't want/will not use. Maybe better to shift away from wanting highest number of car-free developments and have a percentage of all developments that are car-free instead.
- CPRE London support car-free development and more efforts should be made to use planning policy to restrict car parking and driving. Support proposals to restrict front garden parking. Policies could ensure bus lanes, pavements are given higher priority.
- A comment the location of electric charging points should be promoted within the new development parking provision; on-street embeds parking and detracts from the attractiveness, safety and amenity of the place. Clarify the meaning of 'well-located' for cycle storage so that it is easily accessible and convenience i.e. near the building pedestrian entrance; it should be safe, secure and easy to use

<p>by people of all ages and abilities. The standards in part I seem far too low; car clubs are the opportunity to reduce car trips/ownership and align travel costs per journey more closely with real costs to the environment (individual car ownership puts majority of cost into initial purchase and future journey costs to the car owner relatively small, while costs to environment are high).</p> <ul style="list-style-type: none"> • A comment on paragraph 23.39 this should be expanded to ensure that developers have fully considered and will manage the freight and servicing requirements of residential properties (i.e. not only business needs). 	
Securing new social and community infrastructure to support a growing population	
<ul style="list-style-type: none"> • The Richmond CVS comment on the voluntary sector as owners/leaseholders of community buildings and research identifying they face property issues of affordability of premises, unforeseen repair/maintenance cost, lack of in-house property management expertise, and cost/difficulties of compliance with workplace regulations. Also low awareness of environmental regulations. Local authorities can be landlords, and most common charity sectors were education, health and disability, village halls/community centres, culture, recreation and community development. Outdated community buildings in a poor state of the borough is reflected in the local picture, exacerbated during the pandemic with lower incomes/fees. There is no clear understanding of the assets uses, the communities they serve, and their value in supporting the 20 minute neighbourhood, and it would be useful if the Council mapped and reviewed their buildings and spaces, their maintenance/repair/refurbishment needs and prioritised them in terms of urgency and benefits to the community (<i>see also comment on Policy 21</i>). 	<ul style="list-style-type: none"> • It is considered it would be difficult to map and update existing voluntary sector buildings, and the policy context provides for an assessment of local needs through the planning application process (where permission is required).
Policy 49. Social and Community Infrastructure (Strategic Policy)	
<ul style="list-style-type: none"> • The Metropolitan Police Service seek contributions from major development to cover the cost of policing infrastructure and should be referenced in the policy, the Infrastructure Delivery Plan, and the Planning Obligations SPD. • Sport England note the supporting text refers to indoor sports facilities and welcome the encouragement to engage early with Sport England. • South West London and St George’s Mental Health NHS Trust seek a reference in Part D that other alternative uses such as residential would be considered appropriate, reflecting the London Plan, to optimise the potential on sites. 	<ul style="list-style-type: none"> • It is suggested that a cross-reference to policy 51 is added to the policy and supporting text (paragraph 24.17) in relation to the requirement for a HIAs for residential development of 10 or more units. • Minor updating required to refer to the Integrated Care System which replaced CCGs in July 2022. • It is not proposed to include residential use (open market) as a use acceptable on unviable social infrastructure sites. The policy text as drafted refers to enabling development and also to agreed programmes of re-provision being

<ul style="list-style-type: none"> • The CCG comment on what living locally means for healthcare services and models of care (<i>see comment on Policy 1</i>). The CCG comment that when considering redevelopment or disposal of surplus NHS sites there should be flexibility to allow the loss, or part disposal, in accordance with NHS service transformation and estate strategies. The introduction of housing and other uses provides funds for re-investment, and flexibility would accord with the London Plan. The CCG support clause F and suggest the impact is addressed in a Health Impact Assessment and there should be a cross-reference to Policy 51 B.1. The CCG suggest additional wording that developer contributions will be sought if there is insufficient capacity to accommodate the needs arising from new development, as set out in the Planning Obligations SPD (<i>see also comment on Policy 55</i>). 	<p>taken into account when proposals are determined. However, it is proposed that the supporting text is amended to refer to NHS service transformation.</p> <ul style="list-style-type: none"> • No further changes are suggested. The issue of financial contributions raised by the MPS is dealt with adequately in the text in addition to the reference in the Planning Obligations SPD.
Policy 50. Education and Training	
<ul style="list-style-type: none"> • In relation to identifying sites, this should not include protect green sites/infrastructure, with a suggestion to commission an independent sequential search. A comment that for local authority development there must be safeguards to protect against any questions of bias, with ideally proposals promoted through the local plan. • A comment that schools can have admission priority areas. • Some comments in relation to education provision on the Stag Brewery site (<i>see comments on Site Allocation 34</i>). 	<ul style="list-style-type: none"> • Add clarification to the supporting text on the implementation of Local Employment Agreements to ensure they deliver specific and measurable outputs. • It is considered that in light of safeguarding education land and buildings and the Site Allocations to meet future needs for schools, a site search is not necessary at this time. • It is considered that schools are not able to grant priority to children on the basis of residence within the borough. • The comments in relation to the Stag Brewery site are addressed under Site Allocation 34.
Creating safe, healthy and inclusive communities	
<ul style="list-style-type: none"> • The Mayor of London comment the policies are aligned with the Mayor’s Good Growth objective. 	<ul style="list-style-type: none"> • Support noted.
Policy 51. Health and Wellbeing (Strategic Policy)	
<ul style="list-style-type: none"> • The Richmond CVS comment on a lack of reference to community safety (aside from food and night club licences and reference to crime and minimising anti-social behaviour), given increased concern relating to public safety and measures (e.g. reduction in violence against women, street lighting, stop knife crime) to factor into developing neighbourhoods. 	<ul style="list-style-type: none"> • Add reference in the policy and supporting text to cross-refer to housing design to reflect the importance of healthy homes, as part of the broad approach to health and well-being.

<ul style="list-style-type: none"> • A comment that older people are fit and active but may no longer be able to walk or cycle long distances. A specific point that public transport in the Kew area is being reduced and older people may need to use a car. • Some comments in relation to the approach to takeaways, including whether healthy food neighbourhoods and school super zones should be investigated as an alternative due to the limited impact of this type of policy. • A comment that there are needs of an ageing population with long term health issues (at cost to the NHS and social care) which specialist older persons' housing is designed to alleviate. Therefore the requirements of HIAs should not apply, and should be limited to developments with clear adverse impacts on health and wellbeing and strategic housing. • The CCG comment that the policy should cross reference housing standards, and that there is repetition in the clauses dealing with loss of health facilities. • A comment that the policy should address where and how the provision of public toilets is going to happen, as the Community Toilet Scheme is not working, and details many specific examples of locations across the borough where there is insufficient provision and opportunities exist. • Some general support noted for the policy, including from Sport England, the CCG. 	<ul style="list-style-type: none"> • Add broader references in the supporting text to community safety, including to cross-reference where this is addressed elsewhere in the Plan, and to the emerging new Community Safety Strategy. • Update the supporting text to reflect the move to the South West London Integrated Care System has happened. • It is considered there are already adequate references to recognise the needs of the older population. • It is considered the approach to takeaways is justified (see also Policy 19). • It is considered the approach to requiring Health Impact Assessments is justified. • It is considered that the approach to loss of health facilities should be explicitly stated. • It is considered there are adequate references in the Plan to public toilets.
Policy 52. Allotments and food growing spaces	
<ul style="list-style-type: none"> • Habitats & Heritage support the retention of all allotment sites and their assessment as possible SINCs, but should recognise many require considerable investment e.g. maintaining paths and water supplies, introducing composting. • Comments that the allotments not designated as statutory should be upgraded to such, and that there are waiting lists, with subdivided plots too small for crop rotation. 	<ul style="list-style-type: none"> • Support noted. • Only allotments in Council ownership can be designated as 'statutory'; some allotments are however not in Council ownership and therefore this isn't feasible to do. In addition, designating sites as 'statutory' would need to take place outside of the Local Plan process under the Allotments Act. • Any non-statutory allotments are afforded full protection from inappropriate development through open land designations such as Green Belt, Metropolitan Open Land and Other Open Land of Townscape Importance. • Allotment (including plot) management is not a matter for the Local Plan; respondents are referred to the Council's latest Allotment Strategy 2019-2029.
Policy 53. Local Environmental impacts	

<ul style="list-style-type: none"> • A comment this policy would sit better in the section on Local Character and Quality. • PLA support reference to the Agent of Change principle, in line with NPPF and the London Plan, which states the Council will apply the principle. Thames Water comment the Plan should consider the impact of any development within 800m of a sewage works and 15m of a pumping station, in line with the Agent of Change principle, in line with the NPPF, PPG and the London Plan, through requiring a developer to liaise whether an odour impact assessment is required to assess adverse impact on resident's amenity and any mitigation required. • EA comment in detail on waste management, seeking more details on developer's requirements at waste sites - where poor air quality and excessive noise issues can arise from occupiers of new developments near to these sites. • EA seek clarification in relation to biodiversity - include a definition of receptors in relation to light pollution; support inclusion in relation to construction and demolition that sensitive receptors includes rivers and the habitat they support. • EA comment the Plan should ensure groundwater is protected, identifying sensitive groundwater areas, and where necessary development will not create risk of land contamination whether from previous uses or new development. • EA comment sustainable drainage systems involving infiltration must be assessed with the EA to ensure groundwater protection. • EA comment in detail on development enabling contaminated sites to be brought into beneficial use, and the specific conditions that should be secured and the guidance applicants should be referred to. Suggest a stronger and clearer policy wording to clarify what is required in both terms of assessment and suitability through site investigations, with a risk-based approach to defining contaminated land by identifying the source-pathway-receptor, requiring a Preliminary Risk Assessment where land is potentially contaminated. • Elmbridge Council support the policy and recommend greater emphasis and connection with Policy 3 Tackling the climate emergency, expecting increased development will impact air quality in the Hampton court area. 	<ul style="list-style-type: none"> • Amendment to reflect/reference recent publication of Mayor's Air Quality Neutral LPG 2023. • Minor amendments to incorporate comments from Council's Environmental Health (land contamination) expert, with main change being replacement of 'competent person' with 'aptly qualified person'. • Part C amended to make clear that agent of change principle is relevant to nuisance-generating uses and not just noise. • Intro section of supporting text to Policy 53 added to include short para linking relevance of local environmental impacts to the climate emergency. • Amendment to policy and supporting text to refer to dewatering in Construction Management Plans. • Supporting text of agent of change amended to include odour as a nuisance from existing uses. Supporting text amended to include the addition of a requirement to submit a relevant impact assessment, where development is likely to be impacted by an existing nuisance-generating use, to enable the Council to understand the nature/degree of the impact, and to inform the necessary mitigation measures required to make the development acceptable. • The supporting text on light spill has been amended to make clear that occupiers, residents and wildlife are deemed to be 'receptors'. 'Ecological habitats, including rivers' has been added/clarified as a receptor. • The supporting text on land contamination has been amended to reference Policy 8 (Flood Risk and Sustainable Drainage) and the need to minimise risk of groundwater flooding (which can increase risk of land contamination). Additional text added to outline that water quality must also be protected from land contamination risks. • It was not considered necessary to set out specific distances from certain uses for when an impact assessment (re noise, odour air quality etc) would be required for new development. The policy and text is already clear that the Council will require this information where necessary. • It was not considered necessary to specifically mention waste sites, with regards to applicant's requirements for new developments near these sites, as this is covered within 'nuisance-generating uses' and would be subject to the agent of change principle.
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	<ul style="list-style-type: none"> It was not considered necessary to specify/include all of EA's recommended requirements, as these recommendations are already requirements in other policies within the Plan (eg Policy 8 Flood Risk) and/or would be dealt with outside of the planning process via other legislation pertaining to environmental matters. The requirements set out in the land contamination supporting text are considered to be sufficiently clear, especially as it states that a competent person is required to prepare any necessary reports. The EA would also be a statutory consultee as part of the planning process.
Policy 54. Basements and subterranean developments	
<ul style="list-style-type: none"> A comment that the Policy should be modified to demonstrate that the scheme will not puncture or degrade a sealed or isolated aquifer or increase or otherwise exacerbate flood risk. A comment this policy would sit better in the section on Local Character and Quality. Thames Water comment that the policy should require all new basements to be protected from sewer flooding, through installation of a suitable pumped device, where there is a waste outlet from the basement, as basements are particularly vulnerable to sewer flooding. 	<ul style="list-style-type: none"> This matter is already addressed in Policy 8 Flood Risk and Sustainable Drainage. The policy sits well amongst the policies that focus on creating safe communities, particularly alongside Policy 53. Local Environmental impacts. A pumped device is already requested at paragraph 16.82 of Policy 8. To ensure this requirement is also stipulated in policy, a new criterion is proposed as part of Policy 54 to specifically require the installation of a suitable pumped device to protect from sewer flooding.
Delivery and Monitoring	
Policy 55. Delivery and Monitoring	
<ul style="list-style-type: none"> The Royal Parks note the size and value of the Royal Parks, and it is important some of the value of development helps to support the maintenance, management and protection of Parks which will come under increasing pressure. The CCG welcome the policy, but the clauses under Infrastructure do not refer to social infrastructure and does not reflect the requirements in Policy 49. Part D refers to planning obligations but the SPD is not mentioned in the policy or supporting text, and the requirements for each type of infrastructure. Note the intention to update the IDP and welcome opportunity to contribute so that it reflects the Richmond Health and Care Plan and Richmond Health and Care Estates Strategy. 	<ul style="list-style-type: none"> A formatting error has been corrected in the policy. The section has been expanded to address implementation of the Plan, drawing out details in the supporting text and to reflect the update to the Council's Infrastructure Delivery Plan and Infrastructure Delivery Statement. Reference added in the supporting text to the Planning Obligations SPD. Reference added in the supporting text to the GLA's datahub. Reference added in the supporting text to future Plan reviews being brought forward through the Government's reformed system for plan-making.
Appendices	

<ul style="list-style-type: none"> Two comments note a Glossary should be added. One notes in the absence of one, the definitions in the NPPF will be applicable. 	<ul style="list-style-type: none"> Add a glossary to the Plan.
<p>Appendix 1: List of Key and Secondary Shopping Frontages</p>	
<ul style="list-style-type: none"> No comments received on this appendix. 	
<p>Appendix 2 Marketing Requirements</p>	
<ul style="list-style-type: none"> No comments received on this appendix. 	
<p>Appendix 3: Tall and Mid-Rise Building Zones</p>	
<ul style="list-style-type: none"> St George Plc and Marks & Spencer comment on the Kew Retail Park tall and mid-rise building zones, commenting on the Urban Design Study and suggesting a scenario of 8 storeys and the testing of 9 storeys should be made available, <i>see comments on Site Allocation 30 and Policy 45</i>. A comment on the Stag Brewery (Mortlake) tall and mid-rise building zones. In the UDS there are three locations where there is inconsistency which requires correcting. The appropriate building height references should be to 7 storeys as a maximum height. The darker tall building zone generally accords with the Planning Brief SPD 2011, however the mid-rise zone is far too broad reaching and does not accord with the SPD and in particular clause 5.31 which requires buildings to diminish in height and scale towards the perimeter of the site or along the Riverside; a reduction is not sufficient in the location shown by the contours and ought to be defined further back from the site perimeter and riverside. It could be interpreted buildings up to 6 storeys would be acceptable at the perimeter and along the Riverside but this would be harmful to the Arcadian Thames context, towpath and surrounding character. Given scale of the site, it would be appropriate to enlarge the diagrams in Appendix 4 for clearer definition of the zones. A comment on the Richmond Station and North Sheen (Lower Richmond Road) tall and mid-rise building zones, raising concern about support for high rise development on Site Allocation 24, Site Allocation 29 and Site Allocation 29 and that the Urban Design Study analysis is flawed, <i>see comments on Policy 45</i>. A comment on the Richmond Station and North Sheen (Lower Richmond Road) tall and mid-rise building zones, raising concern about development on Site Allocation 24, Site Allocation 29 and Site Allocation 29 as the Urban Design Study analysis is flawed, <i>see comment on Policy 45</i>. 	<ul style="list-style-type: none"> Many of the comments are similar to those addressed under Policy 45 and relate to specific sites and the text of the Urban Design Study and not Appendix 3 itself. Please refer to the Summary of Reg 18 comments for Policy 45. A supporting paragraph has been added to Appendix 3 to make clear the colour coding and to refer to the explanatory text accompanying the mapping in Section 4.6 'Tall and Mid-Rise Buildings' of the Urban Design Study (nb. this is in response to comment 1023 received on Policy 45). Amendment to the tall and mid-rise zones at North Sheen, Lower Richmond Road, to set the buildings further back from the railway line to the west. The following amendments have been made to the Urban Design Study that do not relate directly to the Appendix 3 maps/diagrams, but were received as comments to Appendix 3 and have not been raised elsewhere in the consultation on the Plan: <ul style="list-style-type: none"> Amended caption to fig. 446 to reference correct name of pub (Jolly Gardeners) Text for Stag Brewery Tall and Mid-Rise Building Zone amended to read 7 storeys to correct consistency issue Added text to Stag Brewery Mid-Rise Zone section state that buildings should step down sensitively to the riverside and respect the character of the Arcadian River Thames and surrounding area of 2-3 storeys Additional text to the sensitivity section of the character profile for Teddington Residential (sub-area B2a) to reference views from within Bushy Park No amendment to the Stag Brewery Mid-Rise Building Zone, as it is considered that is sufficiently offset already to allow for appropriate stepping down to

<ul style="list-style-type: none"> • A comment on the Richmond Station tall and mid-rise building zones, not convinced the area is suitable for taller buildings, <i>see comment on Place-based Strategy for Richmond & Richmond Hill</i>. • LGC Ltd note the Urban Design Study character area appraisal for Teddington Residential (and sub-area B2a) and suggest the LGC site is one of the few areas in the borough that can accept change, through redevelopment that could be progressed in a form that is highly beneficial to the urban design context and is appropriate for designation as suitable for mid-rise buildings. Acknowledge the sensitivity to change, but should be assessed in more detail. An evolving illustrative masterplan suggests mid-rise buildings could be carefully located and designed to step down to surrounding existing and proposed buildings. The site is no longer fit for purpose and must change to ensure business and scientific needs are met into the future, and the probability of change should be increased to high. Given its suitability and moderate sensitivity to change, suggest assess potential to be designated as a mid-rise zone. • A comment on the Kew Retail Park tall and mid-rise building zones, raising concerns developments higher than the existing height cannot be justified, <i>see comments on Site Allocation 30 and site Allocation 31</i>. • A comment on the Teddington (railway side) mid-rise zone raising concern it is inappropriate, <i>see comment on Place-based Strategy for Teddington & Hampton Wick</i>. • A comment on The Stoop (Twickenham) mid-rise zone raising concern would cause overdevelopment, <i>see comment on Site Allocation 12</i>. • Harlequins Rugby Football Club comment on The Stoop (Twickenham) mid-rise zone as believes potential to accommodate 7 stories or more and should be an opportunity for tall buildings, <i>see comment on Site Allocation 12</i>. • A comment on the North Sheen (Lower Richmond Road) tall and mid-rise building zones, in relation to Homebase site, concern not taken into account locally designated cottages on NW border, <i>see comment on Site Allocation 28</i>. 	<p>surrounding low-rise buildings and Mortlake and Mortlake Green Conservation Areas, noting too that the zone does not suggest 5-6 storeys over the entirety of the zone, as reinforced in the supporting text.</p> <ul style="list-style-type: none"> • No amendment to the scale of the Stag Brewery Tall and Mid-Rise Building Zone diagram, which is considered to be of a scale which sufficiently indicates the heat mapping. • The LGC site has not been included as a Mid-Rise Building Zone, noting its assessment as having a low probability of change largely due to its designation as a Key Business Area and Locally Important Industrial Land & Business Park designation (part of the West Twickenham cluster), together with it having a medium sensitivity to and capacity for change, and further noting that Policy 45 recognises that proposals for mid-rise buildings may be considered suitable outside of the designated zones. • The following amendments – as put forward in duplicate comments received to Policy 45 and/or the relevant place-based strategies/Site Allocations, but which also relate directly to the maps/diagrams in Appendix 3 – have <u>not</u> been incorporated: <ul style="list-style-type: none"> – No amendment to remove Richmond Station, Kew Retail Park, Kew Biothane Site and North Sheen as Tall and Mid-Rise Building Zones. No amendment to remove Teddington (Railway Side) and The Stoop as Mid-Rise Zones. The methodology underpinning the Urban Design Study, which includes scenario testing of the zones and their impact on the surrounding area, is considered to be robust and sound.
Appendix 4: Review of Sites of Importance for Nature Conservation	
<ul style="list-style-type: none"> • A comment about Barn Elms. Add the area of <i>Shadwell Pool from Queen Elizabeth Walk to Beverley Brook</i> as a vital and essential area for nature conservation – for protected wildlife like bats, but also only over-land wet area 	<ul style="list-style-type: none"> • The inconsistency in the mapping of the borough boundary around the river has been improved in the Plan.

to and from the London Wetland Centre from Surrey via Richmond Park Roehampton Golf Club and Barnes Common. The *strip of grass between the Wandsworth Tennis courts and the Richmond Playing Field copse belonging to Wandsworth* used to have special status to protect the woodland copse but removed some years ago; protect again to prevent car and boat parking, waste bins and rubbish being placed on it. Ensure the *no floodlighting on Barn Elms* regulation remains and also *address the issue of increasing numbers of mobile lights*. Already on Rocks Lane Sports Centre narrowing the wildlife run, Enable Wandsworth Sports Centre between the copse and Beverley Brook, Richmond Playing Field Tennis Courts and the London Wetland Centre, and Enable will want on their tennis courts too; patchwork of lights blocks the north/south wildlife corridor, insect life is at its peak for first hour after sunset which lights are switched on so seriously affect food supply for nocturnal creatures.

- River Thames Society comment responsibilities over river-related matters are not immediately obvious, and unhelpful the maps (pages 336 and 339) draw over the borough boundary to exclude the water space which is incorrect. While some of the Council's powers do not apply in/over the river, it is still the responsible borough and charts need to be corrected.
- A comment in support of **RiB32 Udney Park** as the fields are an important corridor of green space for wildlife as well as for sports play. Biodiversity studies show varied wildlife – in particular bat species, and has been partially rewilded.
- A comment in support of **RiB32 Udney Park** being designated as a SINC so that biodiversity can be maintained/enhanced. Site hosts multiple and protected species and acts as connecting habitat for flocks of birds and local wildlife. Its earlier OOLTI status did not prevent some destruction of mature habitat, including tree felling and hedgerow removal.
- A comment the Udney Park Playing Fields Trust support **RiB32 Udney Park** for designation as a site of boroughwide importance, consistent with public access and use of Udney Park as a community playing field. It is a critical habitat as part of the local ecology network of SSSIs and home to at least 9 protected species.

- Support noted for designations at a number of sites, including Udney Park Playing Fields, upgrading of Twickenham Junction Rough and of Portlane Brook and Meadow, Richmond Park, Bushy Park and Home Park, and Longford River in Richmond. Noted support for all the new designations and changes from Habitats & Heritage and FORCE, who also support the candidate sites. Objection to upgrade of Hampton Water Treatment Works and Reservoirs.
- It is considered that existing uses, such as car parks, in relation to golf uses and reservoirs, do not mean sites should be excluded from SINC designations.

- A comment in support of **RiB32 Udney Park** as a Borough Grade SINC. The overwhelming evidence base supporting this designation (with references) includes
 - bat surveys onsite in 2016-17 recorded at least 8 different species of bats, report names 9 species.
 - bat surveys in 2019 recorded similar at least 8 different species of bats, report naming 9 species.
 - the Richmond Bat Species Action Plan steering group noted high species richness, including records of species of conservation concern in London; site is part of a network of green spaces connecting two important bat habitats, Bushy Park and the river Thames, and vitally important to maintain these wildlife corridors which are under threat.
 - for the planning inquiry 2019, Peach Ecology assessed as meeting some criteria for a Site Metropolitan Importance for Nature Conservation, most notably species richness and important populations of species.
 - for the planning inquiry 2019, Dr Sarah Cox evaluated the bat data, considered within the context of the wider landscape (GiGL) and agreed with the Council presents an important local assemblage. Given provides functional connectivity and at least eight species, guidelines clear to apply a precautionary approach and evaluate at least at the borough scale.
 - Natural England in 2019 response on the Local Plan Modifications noted the significant role in the provision of a mosaic of linked and related greenspace across the area, including Udney Park as an important 'stepping stone' site for wildlife.
 - Ecological Appraisal from 2016 noted hedgerows more than 20m long, contain 80% native species, and considered as UK BAP habitat.
 - Salix Ecology Review of Sites of Importance for Nature Conservation in Richmond upon Thames (November 2021) Addendum noted further protected and priority species recorded at Udney Park.
- Habitats & Heritage support the new designations and changes suggested, including the recognition of **RiB32 Udney Park (Playing Fields)** in Teddington as a Site of Borough Importance for Nature Conservation.

- David Lloyd Club comment on **RiB07 Fulwell and Twickenham Golf Courses** and the Salix Review of the site. Support the exclusion of the David Lloyd club, its car park and tennis/external areas. The site assessment confirms the area south of the club of neutral grassland, which forms part of the golf practice area, and dispute this is 'semi-improved' given it is regularly cut to facilitate use by the Club; consider this element of the proposals can be removed from the SINC, providing very little contribution to the designation.
- FORCE support the addition of the new SINC, proposed expansions of existing SINC, and upgrading of SINC from Local to Borough importance. In particular welcome upgrading of **RiB29 Twickenham Junction Rough** to Borough Grade SINC and of **RiB24 Portlane Brook and Meadow** to Metropolitan Grade SINC. Support all of the candidate SINC, in particular **50. Kneller Gardens, 8. Twickenham Bridge, 12. Marsh Farm** and **19. Hatherop Road Allotments, 22. Challenge Court Open Space** and **24. Kneller Hall**. Ask the Council to give consideration to the way in which appropriate public access could be secured to new SINC.
- The Royal Parks comment on **M082 Richmond Park and Associated Areas** (paragraphs 5.3.10 and 5.3.11) and assume the additional areas at Richmond Park Golf Course comprise the two small expansion areas on the eastern boundary of the site – note these comprise an existing overflow car park (within the existing SINC boundary) and an existing golf driving range (closely mown grassland and boundary scrub). On the assumption the inclusion of these areas will not preclude the existing use explained above, there is no objection; other extension areas are on land outside of TRP control.
- The Royal Parks comment on **M084 Bushy Park and Home Park** there is no objection to the area to be added (paragraph 5.3.13) as the habitats warrant their inclusion in the SINC boundary.
- The Royal Parks comment on **RiB06 Longford River in Richmond** there is no objection to the area to be added (paragraph 5.3.17) which would provide a buffer to the River.
- Thames Water object to proposal to upgrade **M085 Hampton Water Treatment Works and Reservoirs** SINC to a Site of Metropolitan Importance. Hampton WTW is an operational site which should not be unduly constrained by

additional planning designations. The proposal to upgrade is flawed based on the presence of all of the WTW infrastructure development on the site similar to industrial processes and are not suitable for the creation/enhancement of new habitats, as important they are able to function in line with operational requirements. Furthermore inclusion of the full WTW is anomalous as it is a developed site with buildings, roads and hardstanding and no natural/green space. The site assessment sets out 'potential' to improve biodiversity conditions e.g. reduced mowing is fundamentally incompatible with the operation. Thames Water has strong commitments to biodiversity to its regulator Ofwat, which includes identifying sites of biodiversity interest where biodiversity can be enhanced without affecting operations. While certain areas may be temporarily not in use they are retained for future operations key to London's water supply improvements.



All responses received to the Pre-Publication Draft Local Plan (Regulation 18)
https://www.richmond.gov.uk/services/planning/planning_policy/local_plan/draft_local_plan/draft_local_plan_pre_publication_version
 Consultation from 10 December 2021 until 31 January 2022

Published by LBRuT April 2023

Please note, the responses below are exactly as received from the respondents and have not been edited by the Council.

They are not alphabetically ordered or in any other order of priority.

Comments have been moved/grouped so that common points are viewed together.

The format follows the questions set out on the [response form](#) in Tables 1 to 5 and the following general comments in Table 6 are in Plan order.

The schedule shows where any personal information within responses relating to contact details, particularly full address data, has been removed stating e.g. *[personal details removed for data protection]* or shown as black rectangles in the appendices.

[Appendices](#) have been made available separately where due to the length or nature of responses they could not be captured within the main Schedule. The officer references added are shown in the Schedule as *[See Appendix....]*

A full consultation report including summaries of issues raised and responses to the comments raised, and a report of the virtual events, are published separately. A separate report will also include discussions with relevant Duty to Cooperate bodies.

Table 1: All responses received (to question 4 on the [response form](#)) in relation to the strategic vision (section 3 of the draft Plan) (as received) and the Council's officer response

(note general comments in relation to the strategic vision are also set out in Table 6 below)

Rep No.	Name	Comment	Council's response
1	Caroline Wren	I don't disagree with anything in this section but I think it's missing some important ingredients / is a bit too light in some important areas; • shouldn't we see something about supporting sustainable energy sources such as solar panels, or is that not in scope for this type of doc because there are limitations imposed at national level on what can be pushed through in a conservation area? • I'm quite concerned about flooding and read that a lot of the borough is 'Critical Drainage Area'; by 2024 there are commitments to have new Sustainable Drainage Systems in place across the borough, according to the Climate Change Emergency Strategy - should that have been referenced? for example better drainage for schools and other public facilities.	Solar panels are already captured in Permitted Development rights unless they are subject to Article 4 Directions or within a Conservation Area. References to specific technologies are captured in para 16.13 of the draft Local Plan. A report to the Council's Environment, Sustainability, Culture and Sports Committee on 6 September 2022 considered energy efficiency within the historic environment and included recommendations for producing additional planning guidance such as an update in the Solar Together guidance. Policy 3 requires development to provide sustainable drainage systems, with further details in Policy 8.
2	Robert Blakebrough	Generally reasonable and not controversial	Support noted.
3	Gary Backler, Friends of the River Crane Environment (FORCE)	This response to the London Borough of Richmond upon Thames Local Plan Pre-Publication Regulation 18 Consultation has been prepared by Friends of the River Crane Environment. FORCE is a registered charity, set up in 2003 and with nearly 800 members, most of whom reside in LBRuT. More information on FORCE can be found at www.force.org.uk The Objects of the Charity are to protect and enhance the corridors of the River Crane and Duke of Northumberland's River for the benefit of wildlife and local people. This response is prepared in relation to these Objects, and we comment on the Consultation draft only insofar as its draft policies pertain to our Objects. We believe that we have a constructive relationship with relevant LBRuT officers, and we value this relationship. It has enabled a positive track record of delivery of benefits for the Crane valley. We look forward to continued engagement with LBRuT in the development and implementation of its Local Plan. At a strategic level, we recognise that the climate emergency and growing population are identified as reasons why a new Local Plan is needed (2.10). We welcome the parity given by the Council in the Local Plan to addressing the climate emergency and accommodating population and business growth. We trust that in its development and implementation, the Local Plan will continue to respond to emerging population levels, taking account of Brexit-related and post-pandemic population shifts. We trust that it will continue to respond also to the changing age profile and work-location preference of residents, both of which impel towards increased demand for accessible open spaces connected by safe and intuitive pathways, and may mitigate the pressure to provide new office space.	Support noted.
4	Jon Rowles	The document has become difficult to comprehend. Maybe the area plans and site allocations need to go to the end. It does not appear 'positively prepared' and I get the impression that LBRuT is trying to push growth onto neighbouring boroughs and the countryside. For instance, conservation areas are not off-limits for new development and they often contain buildings which if replaced could enhance the area. I do not believe that assertion that at the end of the plan period everything a resident needs 'can now be reached within 20 minutes by foot or bike' - some needs may be met this way but not 100% and the plan doesn't have enough detail on how it's going to increase capacity for longer essential journeys that will still need to be made in the context of huge growth taking place in Kingston and Hounslow (both London Plan Opportunity Areas) and the home counties. When you go through the plan it is clear that the policies will never get near delivering this and it makes the plan unsound. Twenty-minute neighbourhoods may be the current "buzz word" in planning circles but Richmond appears to have misunderstood what the 'twenty minutes' refer to. The generally accepted definition is ten minutes to the destination and ten minutes back home (twenty mins in total). This local plan is trying to say that people would be willing to walk a round trip of forty minutes, which is just not going to happen. The council seems to have mixed up the 20-minute neighbourhoods with 15-minute cities which have 15 minute-one way journeys by foot or cycle (and thus significantly less compact) and is more of the traditional 'town-centre-first' policy and doesn't include the need for most people's workplaces to be in the same neighbourhood. Therefore, the plan needs to define better what it trying to achieve; 20-minute neighbourhoods or 15 minutes cities as there are significant differences. Any ambiguities will be fully exploited by developers and their expensive planning barristers. Statements like 'local hubs provide space to work, rather than workers commuting daily out of the borough' already look out of date - and show a lack of understanding of the local labour market. Most employers are now requiring workers to return to the office - and the majority of economically active people in Richmond do not have jobs that can be easily undertaken at home. The local plan is not addressing their needs and appears to be saying that it will be a 'good thing' if their journey to work is taking longer and is more uncomfortable.	It is considered that it is logical for the overarching Living Locally and Spatial Strategy policies to be followed by the place-based strategies interspersed with the relevant site allocations. The themes have then been ordered to start with climate change and affordable housing. In any plan order there will always be policies that have to be at the end; it is more important that the structure flows and it is easy for a user to navigate around the document. As with the adopted Local Plan, it responds positively to seeking opportunities to meet the needs of the borough, including the objectively assessed needs for homes, jobs and other key community facilities in a way that is compatible with the specific context and constraints of Richmond. Policy 29 addresses development in Conservation Areas and is in line with Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended) and paragraphs 199 to 202 of the NPPF. Policy 1 addresses the Council's policy requirements and ambitions regarding 20 minute neighbourhoods, which has been amended to add further clarity. Census 2021 data identifies significantly high rates of residents working from home, although the timing was affected by the pandemic, and the ONS release of commuting data

		<p>If you look at the alternative Travel to Work Areas website you can see that people with fewer qualifications are having to work increasingly further distances to work. Therefore, if the council is serious about reducing the need to travel it needs to improve adult education and training opportunities and set up more adult education hubs across the borough.</p> <p>The borough is an important part of London, the capital city of the UK - but the plan is very 'lite' on how it aims to support London's role as the centre of the UK economy.</p> <p>One of the easiest ways to reduce traffic would be to increase the number of school places so that children can go to a school close to their home. Another is to have more food shops (such as Tesco Express or Sainsbury's Locals) close to peoples homes. We used to have twenty-minute neighbourhoods in the 1950s and they give us a very good blueprint on what facilities are needed. Unfortunately, this plan concentrates on town centres rather than identifying areas that lack services and plugging these gaps.</p> <p>The plan also suggests there should be large scale investment in the cultural offerings in the well to do Twickenham and Richmond centres - where there is already good provision, but then offers very little for the less wealthy areas that have none and just suggests that one-off events can be held in parks or high streets. I can see why the Town & Country Planning Association warns of the risks of gentrification and that left behind areas can be further disadvantaged by the reduced mobility that poorly implemented 20-minute neighbourhoods can cause.</p>	<p>is awaited. See the update to the Employment Land & Premises Needs Assessment which has considered the local economy and latest forecasts further.</p> <p>See Policy 20 in relation to essential local shops and services. See Policies 17 and 18 that support culture.</p> <p>The section on Delivery & Monitoring has been expanded to address implementation of the Plan, and the updated Infrastructure Delivery Plan looks at the future needs of providers. There is emphasis in the Plan on delivery through the private sector, other agencies and bodies, and parts of the public sector, as well as the community and voluntary sector, recognising the limitations of the Council's role.</p>
5	Melanie Gurney, The Planning Lab, on behalf of the Royal Botanic Gardens	RBGK is generally supportive of the overarching strategic vision, including the response to the climate emergency, retaining and improving biodiversity, and protecting heritage and culture.	Support noted.
6	Tom Dunbar	I see an opportunity to allow smaller businesses to thrive nearer Twickenham Green. in particular, local amenities (E.g. gyms) and shops / cafes - especially as more and more people are now working from home. Such amenities should evolve to meet the growing population in this area - particularly with the new Greggs site potentially bringing in more households.	Twickenham Green is being upgraded from a Local Shopping Parade to a Neighbourhood Centre. Please see Policies 17 and 18. Note that Greggs is designated as a Locally Important Industrial Land and Business Park to protect for employment, please see Policy 24.
7	Stephen Brooker, Walsingham Planning, on behalf of Whitbread Plc	Whilst the thrust of the Vision is supported the emphasis on localism should not be allowed to become resistance to the encouragement of inward investment and the attraction of people and resources from outside the Borough, for example hotel schemes which support the local economy and community by attracting and retaining visitors and their spending power.	The emphasis on living locally is intended to encourage the development of vibrant communities that enable residents to complete everyday tasks such as shopping and accessing essential services by foot, bike, or public transport. This is achieved by ensuring residents are within 20 minutes' walk from a town centre, local centre, neighbourhood centre, or local shopping parade in line with Policies 17 and 18, or other smaller concentrations of local shops and services in line with Policy 20. The value of the visitor economy is recognised through Policy 26, which sets out how proposals for tourist accommodation will be assessed.
8	Louise Fluker, The Richmond Society	The vision is a challenging one. Without specific targets which are measurable it might be meaningless	The Local Plan sets out the strategic vision for the borough, as required by the NPPF, as well as the policies that planning applications are assessed against. While the Local Plan is aspirational in nature, it does set certain targets such as for new housing and for what percentage of new housing is classed as affordable housing. The Local Plan Monitoring Framework will be updated for submission. Monitoring of these strategic outcomes and targets is completed in house and published in the Council's Annual Monitoring Report. Please see Policy 55.
9	Siriol Davies, Ham and Petersham Neighbourhood Forum	<p>The 20- minute neighbourhood concept and strategic vision is complementary to the Ham and Petersham Neighbourhood Plan (HPNP) vision copied below. We recognise that HPNP was developed in conformity with the current Local Plan and previous iteration of the London Plan and does not reflect the council's declaration of Climate Emergency or the impact of the pandemic.</p> <p>HPNP Vision To build on the identity of Ham and Petersham as a distinct and sustainable mixed community giving great opportunities to live and work within a semi-rural historic landscape. Our vision for a sustainable community is that, whenever viable, residents will have access to education, shopping, working, cultural and other opportunities within Ham and Petersham so as to foster a greater sense of belonging and identity. We will encourage an increasing proportion of local journeys to be by foot or bicycle by creating a network of cycle/walking routes accessible to a range of ages and good public transport. Local services, activities and opportunities will be complemented by convenient and efficient access to Kingston, Richmond, Twickenham and further afield including central London. Walking, cycling and public transport will be attractive and viable for these journeys also. From our consultation, the range of social groups living in the area emerged as a distinctive and valued characteristic and this has led to the aspiration to continue to encourage a mixed community of different ages and social groups. The description of the neighbourhood area as 'semi- rural' has been used to describe the setting of the settlements of Ham and Petersham within substantial areas of open and undeveloped land. This is also a distinctive and valued feature of our area, providing relative isolation from more urban areas of London.</p> <p>20-minute Neighbourhood concept We are supportive of the 20 minute Neighbourhood concept and the idea of living locally with access to local shops, schools, and social spaces and workplaces within an easy 20-minute walk or cycle journey; nurturing local facilities and connectedness to strengthen communities and improve the quality of life, by reducing the anxiety and time spent travelling, and providing more time to spend with family and friends. And decreasing car journeys to improve air quality, and create liveable cities, and increase active journeys to improve physical and mental health and wellbeing. Inclusiveness and equality As a concept, the provision of local services is inclusive of those who are less able to travel through wealth or health inequality and for younger people and children who are less able to travel independently. For communities who have experienced isolation through lockdowns and shielding, the importance of sustaining relationships and value of social interaction and activity for mental and physical health, has been brought into focus and is addressed through this concept. Economy As the pandemic has exacerbated a rise in internet shopping, the 20-minute Neighbourhood is a means to support local and independent shops and services and provide a strategy for recovery.</p>	Support noted, particularly that it is complementary to the Ham & Petersham Neighbourhood Plan.

		<p>Heritage and Design The plan notes that today's London was formed from the expansion of villages which joined to form the metropolitan area. This concept seeks to re-establish the character and identity of neighbourhoods within the metropolitan area.</p> <p>Climate Emergency The draft Local Plan and 20-minute Neighbourhood strategy responds to Richmond Council's declaration of Climate Emergency and commitment to net-zero by 2050, through reducing need to travel and improving the choices for sustainable and active modes, improving the environment and biodiversity and promoting net-zero development.</p>	
10	Mr & Mrs Metcalf	We are concerned that the climate objective rings hollow when, first, policies allow a weaker approach to flood risk for an extension than a new development/ redevelopment, especially when the former includes the demolition of a house but for a token piece of wall (or, if the developer can manage it, even that can be demolished in the course of the works on safety grounds); second, if the Borough's officers do not enforce the policies, eg accepting FRAs that consultees point out as flawed as to facts and completeness of content. We have personal experience of that.	Please see Policy 8 which has been updated following the Regulation 18 consultation. Enforcement is a discretionary function of the Council where the expediency of each case is determined in line with the Council's adopted Planning Enforcement Policy.
11	Simon Tompsett, Richmond & Twickenham Friends of the Earth	We welcome the emphasis on avoiding climate change and protecting biodiversity.	Support noted.
12	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	We agree broadly with the Strategic Vision but with a number of caveats referred to in this response.	Support noted.
13	Benjamin John	Provision for existing waste disposal to be improved and recycling of plastic waste especially should be included as a top priority.	Please see Policy 7 for the Council's waste management policy, and refers to the Council's SPD on Refuse and Recycling Storage Requirements.
14	Carolyn Doughty	I think it is very important to provide community services and minimise over development of residential properties	The Council's 20-minute Neighbourhood concepts and Policies 17-20 should ensure that neighbourhoods are adequately serviced by community uses as well as shops and services.
15	Lynne Bailey	concern when you mention 20 minute neighbourhoods is that you do not always tie it in with public transport and the need for good public transport to reach those amenities. Many people who prefer to avoid car use do not cycle and would struggle badly to walk for 20 minutes therefore leaving public transport as the only option. I did not feel this section gave enough consideration to the elderly and disabled. I also felt Section 4 had the same issue.	While the emphasis of the 20-minute neighbourhood concept is to encourage more active travel, it is recognised that not all residents will be able to walk or cycle and will need to undertake part or all of their journey by public transport. This is reflected in Policy 1, which has been amended to emphasise facilitating access to public transport including improving inclusive access.
16	Clare Snowdon	I would like to see the borough be even more bold, visionary and courageous in the vision for biodiversity, climate and human welfare - perhaps through training and collaboration e.g. with https://climateimagination.org/	Please see Policy 39 for the Council's biodiversity policy. Several amendments have been made following Regulation 18 consultation to make the policies even more robust. The Council considers the draft Local Plan to have ambition, bold, and deliverable policies that will improve the biodiversity in the borough. Beyond the remit of the Local Plan, the Council's Climate Emergency Strategy is about taking robust action, as shown in the report to the Council's Environment, Sustainability, Culture and Sports Committee in February 2023 highlighting actions delivered and progress made and an updated Action Plan, including for example training and partnership working.
17	Paul Luton, Cycling UK	Fully support this vision	Support noted.
18	Lynda Hance	It's out of date already: 2 We are in year 2 of the pandemic and I can see no acknowledgement of how this has impacted the people of the borough or any consideration to what they will need in the future. I am particularly thinking of larger homes with more space to work from home, & improved broadband connectivity. [See comment 558 in relation to Kneller Hall and comment 552 in relation to Whitton/Heathfield]	To inform the Regulation 19 Local Plan, further evidence base phases and additional studies have been undertaken during 2022 and 2023. There are areas where there may still be a time lag in evidence to be able to firm up medium and long-term trends, but the Plan overall seeks to recognise the impacts on our centres and on businesses and on travel, and has informed the focus on 'Living Locally'. With regard to the specific points Policy 27 promotes enhanced connectivity including broadband, with the supporting text recognising the increase in home working, along with the supporting text to Policy 13 recognising the importance of space in homes, including the potential for future working patterns in some sectors to retain a high proportion of home working.
19	James Armstrong, Richmond Cycling Campaign	RCC strongly agrees with the Strategic Vision. The framing of the Local Plan within the 20 Minute Neighbourhood concept is a remarkably progressive, and to the benefit of all residents. A borough where Active Travel is the easiest choice, with reduced dominance of vehicles and benefiting from a Healthy Streets approach is one that is healthier, happier, and wealthier. We hope Richmond Council is bold enough to deliver the policies that will make this vision possible.	Support noted.
20	Faye Wright, Forward Planning and Development on behalf of BMO Real Estate	The Strategic Vision states that "office space in our main centres has adapted and local hubs provide space to work, rather than works community daily out the the borough". We would comment that Richmond is a key SW London Office Market and is proving particularly attractive for the Technology, Media and Telecomms sector. There has been a recent large influx of available newly refurbished office space. Older office stock is not as able to adapt to the changing post pandemic requirements particularly in the face of the large amount of newly refurbished stock. As a result, the strategic vision to secure the best for the borough needs to recognise the disparity between viable and unviable office space. The release of unviable office space will not harm the strategic vision of increasing jobs and helping business to grow and bounce back following the pandemic.	There is scope for landowners to invest in upgrading existing stock. The update to the Employment Land & Premises Needs Assessment has considered the local economy and latest forecasts further, including the impact of available office floorspace, but recommends a stringent policy to resist losses. A variety of space at different prices will support a range of employment opportunities, wider than just the Technology, Media and Telecomms sector. See also updates to Policy 23; no further changes to the vision are considered necessary.
21	Jim Brockbank	I especially agree with Policy 1 the 20 minute neighbourhood, Policy 11 Affordable Housing, Policy 49 Social and Community Infrastructure, and Policy 51 Health and Well-being These policies are especially relevant in the context of the borough being an attractive locality for families, as acknowledged in the local plan.	Support noted.
22	Michael Cross	The principle of the 20 minute community is a very sound one for the social, economic and environmental development of Richmond	Support noted.

23	Matthew Bolton	I strongly agree with the strategic vision, particularly around the spatial plan to cater for 20-minute neighbourhoods. This is vital as we learn the lessons from the pandemic and the importance of the local community, health and wellbeing. By promoting localism, there will be better opportunities to walk and cycle for daily needs and reduce car dependency within the area which has numerous disbenefits for the driver and the wider community. I strongly support the need to reduce the need to travel and improving the choices for more sustainable travel. As a borough with high car ownership, it will always be difficult to tempt drivers out their cars. In many cases they have paid a lot of money for their car, which they consider as a status symbol and therefore wish to drive it, irrespective of whether it is the most appropriate mode. However, by promoting sustainable modes and reducing the attractiveness of driving, such as the councils free 30 minutes car parking, the council can make a meaningful change to the way its residents behave day to day.	Support noted.
24	Mark Lawson	I support any genuine improvement to the borough that increase or maintain it as a desirable borough to live in. This is clearly an important document which I would have appreciated more time to consider prior to the deadline for one of my local buildings in Teddington.	Support noted.
25	Alison Parkes	I agree that any plans for Teddington should reflect the strong sense of community already within the area. Emphasis should be on promoting local businesses and initiatives rather than national chains. We also need to do more to make our green spaces - like the misnamed Udney playing fields - publicly available. With regard to residential developments, we do need truly affordable housing within the borough. And housing that reflects the needs of families - ie not more blocks of flats. Perhaps the council should take direct landlord responsibility rather than relying on developers - who have other imperatives - to provide 'affordable' dwellings as part of a broader commercial package.	Following the amalgamation of various use classes into a single class (Class E), the Council has limited ability to encourage a variety of different shops and services within this use class. Open spaces that are currently not publicly accessible, such as Udney Park Playing Fields, will be encouraged to make them available for public access and use. Udney Park Playing Fields are already designated as Local Green Space of particular importance to the local community which protects it from inappropriate development. Please see policies 35-38 for the Council's approach to protecting and enhancing access to green space within the Borough. Affordable Housing is designated as a Strategic Policy in the Local Plan. The Council has set an ambitious target for 50% of all housing delivered in the borough to be affordable housing over the plan period. The Council's affordable housing targets are informed by the Local Housing Need Assessment. Please see Policy 11 for more information.
26	Alison Campbell	More social housing for affordable rent needed.	Please see Policy 11 for the Council's affordable housing policy which seeks to maximise delivery of genuinely affordable housing.
27	Ursula Armstrong	There should be an option to agree with some objections and disagree with other objectives/strategic visions [See 357 comment on Site Allocation 9: Teddington Police Station, Park Road, Teddington]	Noted.
28	Sue Clayton Smith	The vision to encourage response to climate emergency is critical. I think this can be assisted by increasing urban greening and protecting what valuable green space there already is in the borough. The plan for new homes is important, however it should be borne in mind that in some parts of the borough housing density is already high and the addition of new homes in these areas with the additional traffic and pressure on local services this will bring needs to be fully taken into account. The variety of shops and uses should be increased and encouraged there are too many of the same type of outlet in Twickenham town centre for example, cafes, barbers etc.	The Council places great importance on the borough's green spaces and other open spaces, and the Plan contains clear and consistent policies intended to protect, enhance, and provide additional open space both in the public and private realms. The Council will also require developments to provide a Net Biodiversity Gain (NBG) so that any proposed loss will not only be replaced but will result in an enhanced provision. Please see policies 34-39 for more information, particularly policy 38 on Urban Greening. Policy 2 is seeking to direct new higher density development in the town centres or places that are well connected. The London Plan sets out a town centres first approach, and also prioritises sites that are well connected by public transport. The NPPF requires us to meet the development needs of the area, to provide for objectively assessed needs for housing and other uses, and expects a Local Plan to optimise the use of land, therefore it would be difficult to avoid further development in certain areas if other policies in the Plan could be addressed. Following the amalgamation of various use classes into a single class (Class E), the Council has limited ability to encourage a variety of different shops and services within this use class. However, Policy 1 on Living Locally and the 20-Minute Neighbourhood Concept activity encourages a mix of uses in order to create vibrant centres. Policy 19 explicitly states that overconcentration of certain uses will be resisted.
29	N Maureen John	Agree with general ideas. Specific to Teddington: To combine the old Police Station in Teddington with housing and use as a medical centre thus relocating Park Road Surgery would be good a use of the existing site.	Support noted. The site allocation for Teddington Police Station requires retention of community/social infrastructure use at ground floor level and specifically identifies medical/health use as one option. Please see Site Allocation 9 for more information.
30	Christine Palmer	Affordable housing needs a far higher presence and priority	Affordable Housing is designated as a Strategic Policy in the Local Plan. The Council has set an ambitious target for 50% of all housing delivered in the borough to be affordable housing over the plan period. The Council's affordable housing targets are informed by the Local Housing Need Assessment. Please see Policy 11 for more information. The supporting text has been amended to recognise affordable housing for key workers and the contribution to communities.
31	David Marlow	P14 - P24. Ok. <u>BUT</u> it is a pity Council largely ignores its own Vision + strategic objectives e.g. See Twickenham Riverside Planning Application ref 21/2758. Project will generate tons (undisclosed) of CO2. Delivers new homes but on Diamond Jubilee Gardens held in Trust for public enjoyment - re-provision is clearly inferior.	The Site Allocation for Twickenham Riverside seeks a comprehensive redevelopment including to provide high-quality public realm, and improvements to the riverside and open space.
32	Christine Duke	Agree for the most part, with reservations. Am concerned that the more positive aspects of this strategic vision will not be experienced fairly and equally across the Borough; And do not consider additional high rise buildings to be of benefit anywhere within the Borough. Also, am concerned that certain areas idealistically proposed for development and infill could end up becoming overcrowded, crammed and cluttered with a mish mash of concrete buildings and deprivation of various and numerous kinds, especially at the centre and on the outskirts of our lovely Borough. I think it is fair to say that most of Richmond Borough residents would want to live in family friendly towns / village areas and healthy streets.	The NPPF requires us to meet the development needs of the area, to provide for objectively assessed needs for housing and other uses. It expects a Local Plan to optimise the use of land, expecting an uplift in density of residential development in city and town centres and other locations well served by transport. The London Plan sets the Council's housing target and directs incremental intensification to existing residential areas within high PTALS or close to stations or town centres. Therefore it is not possible to take an approach that considers we are over populated and resist higher density development.

		Also regarding the vision of local residents needs being reached within a twenty minute walk or cycle ride. It needs to be borne in mind that not everyone can cover the same distance within 20 minutes and the condition of both pavements and roads need to be improved dramatically, and kept safe to use.	While the emphasis of the 20-minute neighbourhood concept is to encourage more active travel, it is recognised that not all residents will be able to walk or cycle and will need to undertake part or all of their journey by public transport. This is reflected in Policy 1, which has been amended to emphasise facilitating access to public transport including improving inclusive access. Comment regarding condition of pavements and roads is noted.
33	Hannah Blunstone, CBRE on behalf of Rugby Football Union (RFU)	The strategic vision states that from adoption of the Plan in 2024 (by 2039) growth will have been accommodated across the borough, making use of the borough's much valued assets. The RFU support this ambition and the creation of adaptable and vibrant places through new development. The vision references the outcome of the 'living locally' concept: by 2039 everything a local resident needs can be reached within 20 minutes by foot or bike. The RFU support the living locally approach for access to essential services to fulfil daily needs. However, the vision and the corresponding policy (Policy 1) as currently drafted applies to 'all development, except householder applications', and needs to clarify exclusions for Twickenham Stadium as a nationally significant sporting and entertainment venue. This is further considered in the attached detailed response letter. The vision includes the borough's sustained and enhanced strong arts and cultural offer, and its role in post-pandemic recovery, providing a destination and reason to visit, locally, from across the wider region and beyond. The Twickenham Stadium and complementary uses included within its site allocation will be key to attract visitors and the associated local spend essential to post-pandemic recovery This is further discussed in the attached detailed response letter. [See comment 522 in respect of Site Allocation 13. Twickenham Stadium]	See response to comment 269. In terms of the strategic vision and overall approach, Policy 2 is seeking to direct new higher density development in the town centres or places that are well connected. The London Plan sets out a town centres first approach, and also prioritises sites that are well connected by public transport. It is reasonable in a strategic policy to not refer to out of centre development which may not be well connected. That does not mean the useful contributions from existing sites will not be recognised. Any proposal is considered on a case by cases and subject to all other Plan policies, so it may be possible to demonstrate there are no unacceptable impacts identified.
34	Mary Egan	The vision to encourage much more response to climate emergency is a high priority. This can be achieved by increasing urban greening and protecting species and habitats thus tackling the biodiversity loss. Wildlife and dark corridors along the borough rivers should be promoted especially after the pandemic when we realised just how important they are. Delivering new homes is good, but some of our communities are overcrowded with dense housing and resultant traffic stress. The variety of shops should be increased, most new openings are related to food - cafes, grocery.	The Council places great importance on the borough's green spaces and other open spaces, and the Plan contains clear and consistent policies intended to protect, enhance, and provide additional open space both in the public and private realms. The Council will also require developments to provide a Biodiversity Net Gain (BNG) so that any proposed loss will not only be replaced but will result in an enhanced provision. Please see Policies 34-39 for more information. The NPPF requires us to meet the development needs of the area, to provide for objectively assessed needs for housing and other uses. It expects a Local Plan to optimise the use of land, expecting an uplift in density of residential development in city and town centres and other locations well served by transport. The London Plan sets the Council's housing target and directs incremental intensification to existing residential areas within high PTALS or close to stations or town centres. Therefore it is not possible to take an approach that considers we are over populated and resist higher density development. Following the amalgamation of various use classes into a single class (Class E), the Council has limited ability to encourage a variety of different shops and services within this use class. Policy 19 explicitly states that overconcentration of certain uses will be resisted.
35	James Bartholomeusz	It is good to see a plan to help combat the climate emergency via local action, including maximising the positive environmental impact of the borough's green spaces. This will be the single most important aspect of any policy, local or national, in the coming years.	Support noted.
36	William Mortimer	Although keen to see redevelopments in the riverside area comprised of Mortlake and Barnes, it is difficult to agree that proper consultation is resulting in the appropriate detail of the proposed schemes, particularly for the Brewery Site. This stretch of the Thames is where J M W Turner learned to paint the river-scape with its mists and surface conditions in a variety of lights. His paintings show the amount of craft on the river plying trade and ferrying people. Historically, the tall chimneys at the brewery site were approved in very recent history. The plan for restoring a village centre for Mortlake, which was gutted when the dual carriageway element of the A3003 was pushed through in the 1960s. A change in the designation of land use from industrial to a mixture of residential and commercial building must therefore consider the character of the adjacent residential areas and the historic importance dating before the huge population growth from the time of Tudor and Stuart monarchies. Since the arrival of the railways this area has supported the verdant riverside towpath and Commons that today provide the recreational lungs of our communities. The Mortlake Community Group reflects a desire to develop the brewery site but has not enjoyed the support of the Council to date in its pursuit of solutions that match the needs of the community and the service infrastructure that is available to support them. I have responded to the Developer's Zoom event on 26th January 2022 and my principle concerns are repeated later.	The Council has produced and adopted the Stag Brewery Planning Brief SPD in 2011 for this site, which sets out the vision for redevelopment and provides further guidance on the site's characteristics, constraints, land use and development opportunities. Please see Site Allocation 34 for more information.
37	David Abel	I agree with the idea of trying to provide services within a twenty minute walk but do not agree that we need to intensify the density of housing. Affordable housing to ensure that the borough is a mix of people and occupations should be the strategy not just to increase housing provision. The desire to tackle biodiversity loss and improving green spaces is an excellent idea but I can't see how that is going to be achieved by building over and astroturfing existing green spaces.	The NPPF requires us to meet the development needs of the area, to provide for objectively assessed needs for housing and other uses. It expects a Local Plan to optimise the use of land, expecting an uplift in density of residential development in city and town centres and other locations well served by transport. The London Plan sets the Council's housing target and directs incremental intensification to existing residential areas within high PTALS or close to stations or town centres. Therefore it is not possible to take an approach that resists higher density development. Policy 11 emphasises the importance of affordable housing delivery, for creating mixed and balanced communities, and the supporting text has been amended to recognise affordable housing for key workers and the contribution to communities.
38	Alice Shackleton, on behalf of The Kew Society	In principle The Kew Society is supportive of this vision. We discuss some aspects and concerns below under relevant policies, as we do have concerns about potential lack of inclusivity of older people (there is noted the increasing proportion of ageing people), those less able and those with young children in the emphasis on cycling an walking or other people who are less mobile and who may need motor vehicle transport.	While the emphasis of the 20-minute neighbourhood concept is to encourage more active travel, it is recognised that not all residents will be able to walk or cycle and will need to undertake part or all of their journey by public transport. This is reflected in Policy 1, which has been amended to emphasise facilitating access to public transport including improving inclusive access.
39	Jon Burrell	Key points of strategic vision are good but would expect a focus on public transport in addition to active travel. More focus should be made on air quality and reducing noise pollution.	Air quality is referenced in the strategic vision, and pollution as a strategic objective. Add further reference in the strategic vision to improving public transport.

			<p>More broadly, while the emphasis of the 20-minute neighbourhood concept is to encourage more active travel, it is recognised that not all residents will be able to walk or cycle and will need to undertake part or all of their journey by public transport. This is reflected in Policy 1, which has also been amended to emphasise facilitating access to public transport.</p> <p>Policy 46 explicitly ensure there is no harm to the reasonable enjoyment of the use of buildings, gardens and other spaces due to, inter alia, air and noise pollution. The Council has additionally prepared and adopted an Air Quality SPD in June 2020 that sets standards for air quality and Air Quality Assessment in the Borough.</p>
40	Bridget Fox, on behalf of the Woodland Trust	We support the vision of protecting, enhancing and extending biodiversity and natural green infrastructure within the Borough.	Support noted.
41	Joanna Childs	<p>Climate change initiatives need to be accelerated or much of the borough will be under water by 2039. Does your use of terms such as “compacted”, “intensification” and “infill” mean you aspire to cram as much housing into the area as possible, so that everyone’s quality of life deteriorates?</p> <p>Has the biological leakage of the ageing population been factored in? In 2013 13.6% of the population were over 65 so will be over 91 by 2039 and it is likely that many may have died.</p>	<p>The Council’s Climate Emergency Strategy is about taking robust action, as shown in the report to the Council’s Environment, Sustainability, Culture and Sports Committee in February 2023 highlighting actions delivered and progress made and an updated Action Plan. The strategic vision has been amended to reflect the borough aim to be net-zero carbon by 2043, at the latest.</p> <p>The NPPF requires us to meet the development needs of the area, to provide for objectively assessed needs for housing and other uses. It expects a Local Plan to optimise the use of land, expecting an uplift in density of residential development in city and town centres and other locations well served by transport. The London Plan sets the Council’s housing target and directs incremental intensification to existing residential areas within high PTALS or close to stations or town centres. Therefore it is not possible to take an approach that considers we are over populated and resist higher density development.</p>
42	Vivien Harris, Friends of Richmond Green	<p>The Friends of Richmond Green (FoRG) is an amenity action group. Our key aims and objectives are:</p> <ul style="list-style-type: none"> • to promote public interest and civic pride in Richmond Green and vicinity • to improve the quality of life and long-term attractiveness for residents • to improve the character and quality of the built and natural environments • to improve the cleanliness and appearance of the streets and public spaces • to contain traffic while recognising the parking needs of residents and visitors • to encourage responsible use of The Green and surrounding area <p>FoRG as an amenity group is over 50 years old and is run by an executive committee based on a formal constitution. The Friends of Richmond Green fully endorse and support the response by Prospect of Richmond to the new draft Local Plan. We have read the response and have been engaged with the respondents on the content. For clarification, the response is a Prospect of Richmond response with Friends of Richmond Green support and endorsement.</p>	Noted.
43	Alec Lever, Richmond Labour Party	Congratulations are due to all whose diligent work produced this plan. Its Strategic vision and objectives are endorsed by Richmond Labour Party.	Support noted.
44	Vicky Phillips, Habitats & Heritage	<p>Habitats & Heritage (www.habitatsandheritage.org.uk) is a local charity based in Twickenham that acts for the natural and historic environment and climate of South and West London. We act as the Chair and Secretariat of the Richmond Biodiversity Partnership which produces the Richmond Biodiversity Action Plan. We also work on projects which seek to tackle climate change, including the energy efficiency project South West London Energy Advice Partnership (www.swleap.org.uk), and involve the community in parks and open spaces.</p> <p>We are pleased with the overall shape of the plan and its emphasis on action to tackle the climate emergency, protect and increase biodiversity and protect local heritage. The concept of living locally and the 20-minute neighbourhood is also very much part of the vision of our charity which seeks to connect people to the places where they live and work.</p>	Support noted.
45	Peter Willan and Paul Velluet, Old Deer Park Working Group	We agree broadly with the Strategic Vision but with a number of caveats referred to in this response.	Support noted.
-		Note comments on site-specific allocations (including in relation to Site Allocation 9: Teddington Police Station) have generally been collated in Table 6 below.	

Table 2: All responses received (to question 5 on the [response form](#)) in relation to the strategic objectives (section 3 of the draft Plan) (as received) and the Council’s officer response
(note general comments in relation to the strategic objectives are also set out in Table 6 below)

Rep No.	Name	Comment	Council’s response
46	Caroline Wren	<p>There were a few details I thought were lacking / too light:</p> <ul style="list-style-type: none"> • if one of the aims is to make this borough 'affordable for all', shouldn't there be more reference to that? or is a few nods to affordable housing and the 20 min neighbourhood the only in-scope initiatives for this type of doc? I felt like we should see harder targets for pricing on new homes, potentially commitments on rents too. • I would have preferred to see a mention of VisionZero for reducing Killed & Seriously Injured on the transport network • obligations around sites important for nature conservation (SINC) include preventing adverse effects from air/water/noise pollution; as such, couldn't we aim for more to be done to improve pollution around those sites? 	<ul style="list-style-type: none"> • The Local Plan forms the basis for assessing planning applications in the Borough and would not be appropriate to set hard targets for pricing of new homes or rental rates, as it beyond the remit of the Plan as the Government does not allow rent control. The Council has set an ambitious target for 50% of all housing delivered in the borough to be affordable housing over the plan period. Please see Policy 11 for more information. • The Council is committed to Vision Zero, which is adopted in the borough’s Local Implementation Plan. It sets the long-term aim of achieving Vision Zero by 2041 by lowering

		<ul style="list-style-type: none"> from the Climate Change Emergency strategy there's some commitments to details like installing drinking water fountains and creating rain gardens, blue/green roofs, etc - i didn't see mention to that type of initiative specifically in the Local Plan, although I think those ideas were being hinted at; could we be more specific so that the plan will be more measurable and actionable? 	<p>speed limits on local roads, working with TFL to lower speeds on the TLRN, addressing collision hotspots and through education and training. Measures are largely outside of the remit of the Local Plan, and therefore it is not considered necessary to reference.</p> <ul style="list-style-type: none"> The Biodiversity Action Plan recognises specific threats from pollution, including in individual habitat and species action plans. Where development would impact on a species or habitat Policy 39 applies the mitigation hierarchy. Actions to improve pollution around sites that is not in relation to new development can be taken forward by the Council with local stakeholders, with generic and specific actions set out in the Biodiversity Action Plan. As explained above, the Local Plan is a planning policy document that guides decision makers in assessing planning applications. It sits alongside the Climate Change Emergency Strategy as a policy document of the Council as a whole. The Plan is specific, measurable, and actionable in determining the planning policy approach for applicants. Rain gardens and green roofs are recognised for their role in surface water drainage and urban greening where they may form part of development proposals. Reference to free drinking water is included in Policy 51, which reflects London Plan Policy D8, as these may form part of public realm proposals.
47	Myrna Jelman	I support urgent urban greening as well as mitigating strategies for surface flooding in the borough. There is no sense of crisis from the local plan yet in my view and yet flooding is coming to London, as we already know.	The Council recognises the extreme challenge that climate change poses and the need to create a climate resilient Borough. Please see Policy 8 on Flood Risk and sustainable drainage and Policy 38 for the Council's urban greening policy, and Policy 3 for the Council's Strategic Policy on Tackling the climate emergency.
48	Jon Rowles	<p>There are ten strategies - with a subset of policies under each one. They are too long, difficult to comprehend and are confusing which will result in few people being to understand what the key strategies actually are.</p> <p>It looks like the council have copied out the old community plan and corporate plan objectives rather than thinking about what is a strategic policy is. Maybe the council need to look at paragraph 20 of the NPPF - and are more general aims and policies and need to be moved to the correct section.</p> <p>The NPPF also expects councils to identify shortfalls in infrastructure and community facilities and find places for these identified needs. the council does not appear to have done this and only says that any new provision should be in town centres, or that they are doing research (such as sites for education) and will report back separately outside of the local plan process.</p> <p>The strategy section is dominated by net-zero and a host of other environmental policies but they probably should not be here – as they sit below the top-level item of combating climate change and are more detailed policy. It may also be wise to move the detailed strategies into separate supplementary planning documents so that they can be updated more often. I suspect the requirements around zero-carbon houses, boilers, heat pumps etc will keep changing as more research is carried out.</p>	<p>The themes have been developed since the Direction of Travel consultation in 2020, and have been ordered to start with climate change and affordable housing. Where a policy is a Strategic Policy, this is clearly signposted in the Plan on the list of policies and in the policy titles.</p> <p>As with the adopted Local Plan, the Plan is unable to meet the objectively assessed needs for housing and employment. References to updated evidence base have been added to the Plan. The section on Delivery & Monitoring has been expanded to address implementation of the Plan, and the updated Infrastructure Delivery Plan looks at the future needs of providers.</p> <p>The Council's climate change policies are bold and ambitious, and it is necessary to include all policy requirements in the Plan. While SPDs can be updated through a quicker process, they can only provide greater detail and guidance to supplement Local Plan policies. It is intended that the Sustainable Construction Checklist SPD will be updated to reflect the new Plan, once it nears adoption.</p>
49	Melanie Gurney, The Planning Lab, on behalf of the Royal Botanic Gardens	No specific comments.	Noted.
50	Tom Dunbar	<p>I strongly agree and support the broad objectives of the borough as stated in the document. Relevant to comments made later in my response, I strongly support the Council's ambitions to response to climate emergency with decisive action and delivering new home (especially genuinely affordable housing).</p> <p>I encourage the Council to continue to work with organisations such as FORCE to achieve these aims.</p> <p>At a high level, I support the vision to increase urban greening and protecting brown and green field sites where possible.</p>	Support noted.
51	Stephen Brooker, Walsingham Planning, on behalf of Whitbread Plc	Whilst the thrust of the Objectives is generally supported it is important that interpretation of the Objectives into policy does not become too inflexible, for example it is important to recognise existing patterns of development/land use in considering new proposals (for example that not all "town centre" uses are currently located in town and district centres but that they are nonetheless worthy of support) and that there will be practical limitations on the ability of some new development to fully meet all climate change objectives so that pragmatic application of policy is important.	All proposals are assessed on a case-by-case basis against the Plan as a whole. The Council has identified a town centre hierarchy that also recognises smaller parades of local importance. The Council's climate change policies are bold and ambitious, all developments will be expected to conform to the policies within the Plan. Please see policies 3 and 17-20 for more information.
52	Victoria Barrett-Mudhoo, Lichfields on behalf of the West London NHS Trust	n/a	Noted.
53	Louise Fluker, The Richmond Society	<p>The strategic objectives are laudable because they are so general but there are some ones which contradict each other. For example the population of the borough is said to be ageing but how the transport needs of elderly and less mobile residents are to be met is not clear unless there is good public transport and a recognition that some people will still need to drive even if getting the rest of the population to walk or cycle is highly desirable.</p> <p>Likewise there is much emphasis on the concept of a 20 minute neighbourhood i.e. with residents being able to reach amenities within 20 minutes by bike or foot but such areas will be different since a cyclist will travel at least three times as far as a pedestrian in 20 minutes. Which is meant?</p> <p>There is a good emphasis on the environment as regards new housing and developments but one of the challenges is that the housing stock in Richmond is old and the draft Plan highlights that domestic emissions are the major source of carbon emissions but the draft does not address this.</p>	<p>While the emphasis of the 20-minute neighbourhood concept is to encourage more active travel, it is recognised that not all residents will be able to walk or cycle and will need to undertake part or all of their journey by public transport. This is reflected in Policy 1, which has been amended to emphasise facilitating access to public transport including improving inclusive access. Further details are added to the supporting text in Policy 1 as to how the 800m relates to the borough, but clarifies this is not measured as an absolute geography, and there are no fixed zones or boundaries.</p> <p>Policy 3 recognises that extensive retrofitting will be required to decarbonise Richmond's existing building stock and will actively promote retrofitting of existing buildings through low-carbon measures. See further in response to comment 138.</p>
54	Siriol Davies, Ham and Petersham Neighbourhood Forum	<p>The Ham and Petersham Neighbourhood Plan (HPNP) strategic objectives are copied below, although we recognise that HPNP was developed in conformity with the current Local Plan and previous iteration of the London Plan and does not reflect the council's declaration of Climate Emergency or the impact of the pandemic.</p> <p>HPNP objectives</p>	Noted.

		<p>1.1.4 Character and Heritage To ensure all development enhances the character and appearance of the area and is designed to integrate with the existing architecture and green spaces. To ensure that development is only permitted in locations which are consistent with the vision for the neighbourhood.</p> <p>1.1.5 Housing To ensure the mix of any new housing has an appropriate balance in terms of tenure, size and type. Opportunities will be optimised for affordable housing. Older persons' housing, providing for a range of independence and support, will be encouraged.</p> <p>1.1.6 Green Spaces To protect and enhance existing green spaces, sites of historical and environmental significance and the semi- rural character of the area, for the benefit and enjoyment of the local and wider community and in the interest of nature conservation.</p> <p>1.1.7 Travel and Streets To create better transport links within the neighbourhood and with adjoining centres, in such a way as to enable safe walking, cycling and the use of public transport, and to minimise traffic congestion and pollution.</p> <p>1.1.8 Community Facilities To provide an appropriate range of community facilities which will promote the health, education and physical, mental and spiritual development of all residents, particularly the young and the elderly.</p> <p>1.1.9 Retail and Local Services To enhance the character, quality and distinctiveness of the neighbourhood's three local centres to ensure viable and vibrant shopping centres serving residents and visitors. To encourage small businesses and self- employment, many based from home.</p> <p>1.1.10 Environmental Sustainability To ensure that buildings in the area achieve the highest of standards for energy and water efficiency and that flood risk is minimised.</p>	
55	Mr & Mrs Metcalf	See above [See comment 10 on strategic vision]	Noted.
56	Simon Tompsett, Richmond & Twickenham Friends of the Earth	<p>P16 Responding to the climate emergency and taking action: Good statement but needs to consider existing buildings too, esp with regard to alterations and changes. If owners are seeking planning permission for extensions say, would it be possible to grant it only if they undertake other improvements to improve their energy efficiency?</p> <p>P20 "Provide a positive approach to accommodate growth across the borough"- not clear what this means. Is it the number of residents, of buildings, of households or of land occupied by buildings? Needs clarification as each of these has differing implications.</p>	<p>Policy requirements are related to the nature and scale of a proposal, so this limits opportunities via householder extensions (that may be permitted development) (and similarly to the Building Regulations that would apply), although the Council makes efforts to raise awareness. Policy 4. Minimising Greenhouse gas emissions and promoting energy efficiency (Strategic Policy) does set out requirements for all conversions and changes of use that result in the creation of 1 or more dwellings. They must provide an energy strategy as well as achieve net zero carbon along with a 35% reduction of carbon emissions against Part L 2021 on site.</p> <p>The general reference to accommodating growth is considered appropriate in the strategic objectives, as Policy 2 in particular in the supporting text, explains the future needs for housing, employment, retail and leisure, as identified through the housing target or future floorspace needs.</p>
57	Philip Briggs, Richmond Bat Species Action Plan Steering Group	The commitment to increasing biodiversity is excellent, in particular in relation to the constant pressure of development: "Require new major development to provide on-site green spaces with multi-functional benefits for biodiversity, climate change as well as health and wellbeing, including providing formal and informal education opportunities to enable people to learn about and connect with nature and biodiversity".	Support noted.
58	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	We agree broadly with the Strategic Objectives but with a number of caveats referred to in this response.	Noted.
59	Benjamin John	The policy of new residential builds that incorporate 'affordable' housing should be a top priority. Prices of houses in the Teddington area are grossly inflated and are available only to those people are cash rich.	Affordable Housing is designated as a Strategic Policy in the Local Plan. The Council has set an ambitious target for 50% of all housing delivered in the borough to be affordable housing over the plan period. The Council's affordable housing targets are informed by the Local Housing Need Assessment and the affordability issues are recognised. Please see Policy 11 for more information.
60	Eileen Folan	Anti car use policies too aggressive. Focus on active travel does not consider needs of less mobile (older, disabled) people and can limit their ability to shop locally and enjoy our green spaces. Pedestrian safety not incompatible with 30mph speed limit on main roads, particularly with new highway code and pedestrian rights. 20mph in residential streets good but frustrating on main roads.	<p>The emphasis in the Plan is contributing to a modal shift away from the car, to minimise residents' trips made by car, recognising the borough has high levels of car ownership. The 20-minute neighbourhood concept is intended to encourage the development of vibrant communities that enable residents to complete everyday tasks such as shopping and accessing essential services by foot, bike, or public transport. While the emphasis of the 20-minute neighbourhood concept is to encourage more active travel, it is recognised that not all residents will be able to walk or cycle and will need to undertake part or all of their journey by public transport. This is reflected in Policy 1, which has been amended to recognise that not everyone will be able to walk or cycle and emphasise facilitating access to public transport including improving inclusive access.</p> <p>Outside of the remit of the Local Plan, note that the Local Implementation Plan (2018) refers to the introduction of the lower 20mph speed limit on borough roads – the key aim is to reduce the number and severity of collisions; reductions in vehicle speeds are particularly beneficial for pedestrians, cyclists and other vulnerable road users when struck by a vehicle.</p>
61	Serge Lourie	<p>I support the strategic objectives, especially the commitment to respond strongly to the Climate Emergency</p> <p>However, I do not feel that the Plan goes far enough as it appears not to give enough weight to the impact of the climate emergency on listed buildings and in conservation areas.</p> <p>Although I support many of the policies relating to listed buildings, I believe that tackling the climate emergency should always take priority over other policies.</p> <p>In conservation areas and on listed buildings, "enhancement" should include the reduction of greenhouse gas emissions</p>	The Plan places emphasis on reuse and conversion of existing buildings to minimise embodied carbon with a presumption in favour of refurbishment set out in Policy 2. The Council has prepared a Net Zero Carbon Study to support several policies in the Plan which set out ambitious targets for Richmond. There is no one-size-fits all approach or solution to accommodating sustainable energy measures in the historic environment, and further

			details are added to the supporting text of Policy 4 to recognise this conflict and how it is expected to be addressed on a case by case basis.
62	Clare Snowdon	perhaps supporting initiatives such as Transition Towns (as in Totnes), and a People's Climate/Nature Assembly, using Doughnut Economics tools in decision making, solving the issue of LED street lights decimating insect populations far more than sodium lights did, dealing with vacant properties and property-as-an-investment vs housing need (as far as possible within national policy)	Comments are noted but suggestions largely fall outside the scope of the Local Plan. Tools in decision-making for organisations, including the Council, are beyond the remit of the Local Plan. The Council's work on climate policy and projects may take a broader view on initiatives around climate change. A report to the Council's Environment, Sustainability, Culture and Sports Committee in February 2023 on the delivery of the Council's Climate Emergency Strategy, including a 2023 Action Plan, with an expansion of climate and sustainability engagement work planned for 2023.
63	Paul Luton, Cycling UK	Again fully in support. Arguably Hampton should be included in development centres to give spread into SW of borough. New housing must be highly energy efficient by requirement. It would be a logical extension to have a target for reducing car ownership per household.	Hampton Village and Hampton Hill are identified as Local Centres in the Plan's centre hierarchy. Please see Policies 17 and 18 for more information. Policy 4 sets out the Council's approach to energy efficiency and identifies targets for new-build residential development. The Council's Living Locally and 20-minute neighbourhood concept policies aim to promote more use of active travel and public transport that would reduce the need to own a car for the majority of residents. The emphasis in the Plan is contributing to a modal shift away from the car, to minimise residents' trips made by car, recognising the borough has high levels of car ownership. A target in the Local Plan for reduced car ownership is not therefore considered appropriate. A report to the Council's Transport and Air Quality Committee in November 2022 on Transport Priorities 2022-26, agreed new performance indicators and targets in relation to transport, which are kept under review.
64	Lynda Hance	See above [comments on vision] - you are focusing on the wrong things and ignoring the things that are important for residents and which will hugely impact on us.	See response to comment 18.
65	James Armstrong, Richmond Cycling Campaign	RCC strongly agrees with the Strategic Objectives, particularly those that require measures to be taken in new developments to encourage Active Travel and improve the Public Realm, create 20 Minute Neighbourhoods, and make reference to the application of a Healthy Streets approach. It was additionally encouraging to see the holistic inclusion of Active Travel as a tool for delivering many of the Strategic Objectives. Focusing on the Strategic Objective: Reducing the need to travel and improving the choices for more sustainable travel, we are excited to see active and public transport featured prominently, and are largely supportive. However, we would ask that the council aims more highly than simply "maintaining" post pandemic increases in Active Travel, and instead finds appropriate wording to deliver on the Strategic Vision, which in our understanding would require levels of walking and cycling far higher than those seen post-pandemic. The Strategic Vision for example states that by 2039 Richmond will have increased levels of Active Travel.	Support for the strategic objectives noted. The emphasis in the Plan is contributing to a modal shift away from the car. Please see policy 47 on Sustainable Travel Choices that explicitly deals with enhancing active travel in the Borough. The long term Local Implementation Plan target is for 75% of journeys to be made by sustainable modes by 2041. A report to the Council's Transport and Air Quality Committee in November 2022 on Transport Priorities 2022-26, agreed new performance indicators and targets in relation to transport, which are kept under review. However it also relevant to note that revenues that support transport investment, for the Council notably from parking management, and for other providers income from fares, have not recovered to pre-pandemic levels.
66	Faye Wright, Forward Planning and Development on behalf of BMO Real Estate	In relation to the strategic objectives in relation to jobs and helping businesses to grow and bounce back, the objectives should recognise that protection of all employment uses may not result in the most efficient use of land. In the case of outdated/unviable office space, it is not considered that the protection of these spaces will help businesses to grow. Encouraging the delivery of newly refurbished, viable office spaces which meet occupier demands should be the focus of the Council's strategy in relation to office space.	See response to comment 20.
67	Jim Brockbank	I strongly agree with the objective to promote working with communities and local partners including the public sector, community, and voluntary sector as set out in paragraph 2.23	Support noted.
68	Matthew Bolton	I agree with the strategic objectives in light of the climate emergency and need to reach net zero. I think that the council should be ambitious and consider workplace parking levies under its objective to reinforce the need for business and workplaces to embed sustainability at their heart.	This is not a matter for the Local Plan; it is not solely related to new development. The Mayor's Transport Strategy refers to workplace parking levy schemes as a possibility for the next generation of road user charging systems. Generally work place planning levies would be part of a package of measures promoting alternatives to car travel and improving transport options and infrastructure. It would be subject to a scheme order, operated through a licensing scheme, rather than any link with planning.
69	Mark Lawson	It is frankly too wordy to read on a mobile phone. I won't always agree with Council decision-making, or be consulted on it, but one has to applaud the consideration and intentions of those deciding the future of this wonderful borough.	Support noted.
70	Liz Waters	Largely agree, but the Council needs to ensure that there are adequate facilities (eg health services, transport capacity, school places, playing fields) to support any increase in population resulting from provision of new residential developments.	Policies 49 and 50 set out the Council's policies regarding social and community infrastructure and education facilities. The Council supports the provision of other essential services and infrastructure such as transport and health. Proposals need to assess the potential impacts on existing infrastructure. However, service provision itself would be a matter for the relevant provider such as a health body. Where the Council does have the ability to support the provision of infrastructure this has been identified in the plan. See also Policies 37 for outdoor sport and 47 for sustainable travel choices. The section on Delivery & Monitoring has been expanded to address implementation of the Plan, and the updated Infrastructure Delivery Plan looks at the future needs of providers.
71	Sue Clayton Smith	Reducing the environmental impact of air, noise, light and odour pollution is important. Thames Water should not be allowed to regularly pollute our rivers. Affordable housing is important but needs to be managed carefully and the creation of high density flats should be managed against the need for family homes, ie don't just allow lots of small flats to be built.	Policy 46 requires all new development to protect the amenity and living conditions of new, existing, adjoining and neighbouring properties.

		Green spaces for residents to relax is really important, particularly now that so many people are working from home more and therefore likely to be using these type of spaces more regularly. They need to be safe and planned so that people feel safe using them, with regular park and police patrols if necessary. Planning for walkable environments which are well connected to the surrounding areas is good but the impact on the surrounding existing residents must also be taken into account.	Policy 13 seeks a higher proportion of small units in sustainable locations, it does not set prescriptive proportions by unit size and tenure that need to be met, allowing for a site-specific assessment. The Council places great importance on the borough's green spaces and other open spaces, and the Plan contains clear and consistent policies intended to protect, enhance, and provide additional open space both in the public and private realms. The Council will also require developments to provide a Biodiversity Net Gain (BNG) so that any proposed loss will not only be replaced but will result in an enhanced provision. Please see Policies 34-39 for more information.
72	N Maureen John	Sounds good though I'm no expert and have only glanced at the detailed document	Support noted.
73	Christine Palmer	facilities for youth needs to be enhanced and prioritised	Policy 37 and 49 provide for play and sporting facilities and youth centres, please see these policies for more information.
74	David Marlow	P14 - P24. 1/3 of respondents with disabilities said they would no longer visit because of poor access + loss of parking (80 spaces). Overall regular visitors will reduce by 4% + all bad for retail and hospitality businesses + cultural offer. The presents DJG cafe is special, popular is being destroyed 5 storey block flats on Wharf Lane will be a blight.	While the emphasis of the 20-minute neighbourhood concept is to encourage more active travel, it is recognised that not all residents will be able to walk or cycle and will need to undertake part or all of their journey by public transport. This is reflected in Policy 1, which has been amended to emphasise facilitating access to public transport including improving inclusive access. The Site Allocation for Twickenham Riverside seeks a comprehensive redevelopment including to provide high-quality public realm, and improvements to the riverside and open space, including a widened footway to better connect the town to the river.
75	Christine Duke	Strategic objectives - Agree with some, disagree with others. - Agree that previously developed land and preused buildings should be repurposed where possible as part of new developments. Cannot understand why this could not still be the case with the old Richmond upon Thames College building in Egerton Road Twickenham, which could for instance be used as a dance, drama and film making school / college with operational film studios attached as were previously situated at Teddington Riverside. - Agree that on-site green spaces, preferably with seating, should be included in all new developments. - Agree with the ideal of 20 minute neighbourhoods. - Agree with the recognition of the importance of inclusive neighbourhoods. - Agree with protecting and improving the River Thames and its tributaries and environs. Would like to see more thoughtful use in transporting goods as well as people for work as well as leisure purposes, a little more diversity. - Do not agree with enabling tall buildings and/or high density developments to develop anywhere in the Borough, this would increase temperature and pollution levels. - Do not agree that only Richmond, Twickenham, Teddington, Whitton and East Sheen should be disproportionately purposed for major new developments, is unreasonable.	Support noted for a number of objectives. Policies 28 and 46 refer to consideration of the local micro-climate. It is recognised that tall buildings have an impact on the microclimate, and the Urban Design Study contains design guidance on factors to consider during the design development. Policy 2 is seeking to direct new higher density development in the town centres or places that are well connected. The London Plan sets out a town centres first approach, and also prioritises sites that are well connected by public transport. It is not therefore considered disproportionate or unreasonable to direct major new development to these locations.
76	Hannah Blunstone, CBRE on behalf of Rugby Football Union (RFU)	The RFU support the strategic objective to protect what is special and improve our areas (heritage and culture), and value the recognition that cultural facilities provide a destination and reason to visit the borough and a means to sustainably grow the visitor economy. The RFU support the objective to provide a positive approach to accommodate growth across the borough, enabling tall buildings and higher density development in 'appropriate locations'. However, it should also be noted that recent case law has clarified how Policy D9 should be interpreted, and this needs to be reflected in the wording of Policy 45 (Tall and mid-rise building zones). This point is further discussed in the detailed response letter appended to this form. [See comment 1027 in respect of Policy 45]	Support noted. Please see response to comment 1027.
77	Mary Egan	I agree that reducing the environmental impacts of air, noise, light and odour pollution levels is crucial. That Thames Water can regularly pollute our rivers is a disgrace. Delivering genuinely affordable housing, without creating tall buildings, is very important and the necessary social and amenity infrastructure should be a prerequisite, as well as the benefits for biodiversity climate change. Safe play and relaxation areas for children and families are important. Protecting the environment and giving access to the borough's rivers will give wonderful opportunities for the education and appreciation of nature by local people. Planning for walkable environments with street connectivity is good but ensuring the local impacts of development do not damage the health and safety and amenity of existing nearby occupiers is paramount.	Policy 46 requires all new development to protect the amenity and living conditions of new, existing, adjoining and neighbouring properties. See response to comment 162 on why tall buildings are considered in the Plan. Policies 49 and 50 set out the Council's policies regarding social and community infrastructure and education facilities. The Council supports the provision of other essential services and infrastructure such as transport and health. However, the Council processes limited control over this provision and relies on London-wide and National bodies to provide this infrastructure. The Council places great importance on the borough's green spaces and other open spaces, and the Plan contains clear and consistent policies intended to protect, enhance, and provide additional open space both in the public and private realms. The Council will also require developments to provide a Net Biodiversity Gain (NBG) so that any proposed loss will not only be replaced but will result in an enhanced provision. Please see policies 34-39 for more information. See Policy 40 and 41 in regard to rivers and river-based amenity.
78	William Mortimer	On a personal level, I am extremely concerned that the development strategy for the whole area is proceeding without looking at a parallel definition of disaster planning and allocation of resources. Not only flooding but the possibility of a commercial airliner crash or a 'dirty bomb' from terrorist activity requires that priority is given to the safety of local citizens and the services necessary to deliver an effective recovery of services - transport, communications, provisioning, medical services and so on. Hence I am completely averse to the use of the third track over the Thames via Barnes Railway Bridge for a garden when it is of strategic significance to a Disaster Recovery plan.	The Council's emergency planning includes a Corporate Resilience Plan, work with emergency services and other agencies on a multi-agency response, and a Borough Risk Register . This identifies for example the significant number of road and rail bridges that cross the Thames. The Partnership promoting the proposed green walkway along the disused railway bridge have now appointed consultants to progress the project, including costing, and set up a website www.theviewatbarnesbridge.org/ . This sets out the challenges, and it is considered that both the risks and opportunities can be considered as part of the planning and design processes.

79	David Abel	There are elements that I disagree with mainly because the wording is aspirational rather than anything concrete but it's largely sensible but not for the world that the pandemic has shown us so the whole plan is to my mind completely out of date and out of step. I entirely disagree with the objective of providing more housing for affluent middle class people like me. All our new housing should be for the people who actually make society work and any new areas of development particularly brownfield should be turned into largely parkland incorporating traditional gardens or outside space and not towering flats with bars and shops. If the recent pandemic has taught us anything it is that there isn't enough space for people and these objective do not meet that. It's also sad that there is no mention in terms of facilities for new provision of allotments.	The Local Plan sets out the strategic vision for the borough, as required by the NPPF, as well as the policies that planning applications are assessed against. The Local Plan Monitoring Framework will be updated for submission. Monitoring of these strategic outcomes and targets is completed in house and published in the Council's Annual Monitoring Report. Please see Policy 55. Affordable Housing is designated as a Strategic Policy in the Local Plan. The Council has set an ambitious target for 50% of all housing delivered in the borough to be affordable housing over the plan period. The Council's affordable housing targets are informed by the Local Housing Need Assessment. Please see Policy 11 for more information. The Council places great importance on the borough's green spaces and other open spaces, and the Plan contains clear and consistent policies intended to protect, enhance, and provide additional open space both in the public and private realms. The Council will also require developments to provide a Biodiversity Net Gain (BNG) so that any proposed loss will not only be replaced but will result in an enhanced provision. Please see Policies 34-39 for more information. Policy 52 deals with allotments and food growing spaces.
80	Philip Villars, WSP on behalf of Sharpe Refinery Service Limited	We welcome that the Local Plan states that it will enable opportunities to deliver new homes across the borough, and the contribution that sites such as Arlington Works can make to deliver mixed use development. We hope that the planning policies contained within the plan are supportive of these objectives and that officers will deliver upon what is stated within the Local Plan.	See also response to comment 839, as any loss of existing waste and industrial uses on Arlington Works would be considered against the relevant policies protecting those uses.
81	Alice Shackleton, on behalf of The Kew Society	We agree in principle with these, subject to comments we have made elsewhere in this response.	Support noted.
82	Jon Burrell	As someone who lives in small development of flats I am concerned about how we will make changes that help respond to the climate emergency e.g. charging points for electric vehicles in resident parking spaces and retro fitting heat pumps. There should be help for residents to plan and adapt to the changes that will be needed. Would like support for self fixing and freecycling e.g. of electricals. Need identification of wasteful use of energy e.g. digital billboards. Champion elimination of cars from boroughs parks (or placement of car parking on periphery)T.	Comments noted though some suggestions fall outside the scope of the Local Plan. See Policies 3, 4, and 47. A report to the Council's Environment, Sustainability, Culture and Sports Committee in February 2023 on the delivery of the Council's Climate Emergency Strategy, including a 2023 Action Plan, indicating progress and planned actions on many areas including EV charging infrastructure, retrofit, and electrical reuse and repair. See response to comment 869 on digital advertising.
83	Bridget Fox, on behalf of the Woodland Trust	We support the strategic objectives for increasing biodiversity, the quality of green spaces, and greening the borough, including trees.	Support noted.
84	Joanna Childs	All too vague. Need to have concrete measurable objectives. Very woolly about green energy and water efficiency. Also what about sewage?	The Local Plan sets out the strategic vision for the borough, as required by the NPPF, as well as the policies that planning applications are assessed against. The Local Plan Monitoring Framework will be updated for submission. Monitoring of these strategic outcomes and targets is completed in house and published in the Council's Annual Monitoring Report. Please see Policy 55. For more information regarding green energy, water efficiency, and sewage, please see Policies 5 and 9. The updated Infrastructure Delivery Plan also sets out details including on surface and foul water infrastructure and wastewater treatment.
85	Max Millington	Disagree with objective of maximising affordable housing (page 17/341). This should be consistent with London Plan requirement to optimise and should acknowledge competing objectives which mean maximisation will not always be achievable or even desirable (e.g. protection of natural green space). In connection with green space and recreational space, natural spaces (such as playing fields) should be prioritised over man-made spaces (e.g. astro turf pitches), not least for the biodiversity they offer but also because they represent a significant part of what is great about Richmond.	The Council's affordable housing targets are informed by the Local Housing Need Assessment. Please see Policy 11 for more information. This is considered in accordance with the London Plan which does expect all schemes to maximise the deliver of affordable housing (paragraph 4.4.1). Optimising is about the London Plan expectation to use a design-led approach to establish site capacities (Policy D3) which is reflected in Policy 28. The Local Plan sets out a number of priorities, to cater for economic, social and environmental objectives as required by the NPPF, and it would be for the benefits and harm of any proposal to be weighed up on a site-specific basis. The Council places great importance on the borough's green spaces and other open spaces, and the Plan contains clear and consistent policies intended to protect, enhance, and provide additional open space both in the public and private realms. The Council will also require developments to provide a Biodiversity Net Gain (BNG) so that any proposed loss will not only be replaced but will result in an enhanced provision. Please see policies 34-39 for more information.
86	Peter Willan and Paul Velluet, Old Deer Park Working Group	We agree broadly with the Strategic Objectives but with a number of caveats referred to in this response.	Noted.
-		Note comments on site-specific allocations (including in relation to Site Allocation 9: Teddington Police Station) have generally been collated in Table 6 below.	

Table 3: All responses received (to question 6 on the [response form](#)) in relation to Policy 1. Living Locally and the 20-minute neighbourhood (section 4 of the draft Plan) (as received) and the Council's response
[\(note general comments in relation to Policy 1 are also set out in Table 6 below\)](#)

Rep No.	Name	Comment	Council's response
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87	Myrna Jelman	The '20mins' guideline you insist upon seems to privilege walking and cycling over public transport. I would like a similar commitment to a 20mins bus ride guarantee with no more long waits for local buses! I expect much more of the richest borough in London and would like to see a fleet of smaller electric buses running on all major roads in the council at very high frequency, giving access to all in an inclusive and innovative manner and thus contributing greatly to reduced local traffic and increase in air quality, as well as providing a few more local jobs and more discovery of other areas in the council.	Public transport is supported in the policy, particularly enhancing access to public transport. However, bus routes and frequencies are provided London-wide by TfL (who aim for transition to a zero-emission bus fleet by 2034, but for longer routes electric buses cannot be charged sufficiently overnight, and so alternative fuel cell options are being investigated). The Council work closely with TfL and bus operators, but does not have the resources to provide the kind of service described.
88	Robert Blakebrough	People should make their own decisions about where they live not dictated to by the State	The Policy will not dictate where people live. The 'Living Locally' concept will give greater choice for people living and working locally by providing increased accessibility to things like shops, services, parks and community facilities that are in easy reach by foot, bike, or public transport for everyone through improvements to the public realm that incorporate the needs of children, older people, and people with disabilities. Due to wider concerns about the concept, add clarity that the policy is not seeking to restrict movement, and there are no fixed zones or boundaries.
89	Jon Rowles	<p>The council is proposing more of a town-centre-first vision, and then a 15-minute city approach to development. Therefore, unless there is a reboot, the council should adopt the 15-minute city name over that of a twenty-minute neighbourhood.</p> <p>The trajectory of the council's approach is going to be regressive as the council currently has an urban village approach with 14 villages - whilst the new local plan will merge some to create bigger town planning units - so in many ways that council is doing the opposite of what it is claiming to do. Maybe the council need to have a rethink and divide up the top-level places into neighbourhoods so that residents have access to essential food and healthcare needs within a short walk and town centre in a slightly longer journey?</p> <p>Its approach to work is that people will just be able to work from home, or from shared office space. All the guides to 20-minute neighbourhoods talk about providing more mixed-used developments that include workspaces like artist studios, workshops, etc.</p> <p>As mentioned above the 20-minute neighbourhoods are supposed to be about 10-minute one-way trips, but LBRUT have doubled this - and research shows most people will get into the car if the round trip is over 20 mins.</p> <p>It assumes that everyone can walk or cycle - significant numbers of the over 70's will not be able to walk or cycle to these facilities - and the council is proposing to take away car parking in many places will mean they will be cut off from essential facilities. These people are at a huge risk of becoming socially isolated and are likely to see a huge decrease in their quality of life. I know many people in the western fringe of the borough who has become isolated and cut off as they have aged and have become less mobile (such as having to give up their car due to age). This local plan should be doing more to reduce this isolation and improve the offerings in the smaller centres and parades.</p> <p>The plan is very much 'town centre first' and then larger parades of shops but it makes no mention of the social value of corner shops - of which there are still many, often newsagents that also sell small selections of basic groceries. The council should investigate their distribution and what can be done to protect them.</p> <p>There is also a risk to the central London economy if this policy is pursued 'too-far' as there could be disbenefits from deagglomeration - both in terms of the economy and to the individual. The Office of National Statistics has income tables that show that people who live in the borough but commute into central London earn considerably more than those who live and work here. If more people are encouraged to pursue employment close to home the result will be less financial security and lower retirement incomes which will ultimately mean the council will have a higher social care bill.</p> <p>Research undertaken for the Centre for Cities states there is a risk of isolation, territorial stigmatisation, and a widening gap between the rich and poor associated with 20-minute neighbourhoods due to reduced mobility.</p> <p>The Town & Country Planning Association state 20-minute neighbourhoods can be just gentrification if there isn't sufficient provision of affordable housing. I note that Richmond has been building the lowest number of affordable housing in London for some years, and the targets for new affordable housing are also amongst the lowest. I feel the council need to explain how this won't lead to negative social outcomes.</p> <p>The map under paragraph 4.10 needs to be done on actual walking distances - because as the crow fly can greatly exaggerate how accessible places are.</p> <p>An unintended outcome of the pandemic and more flexible working patterns is that more residents could end up working in central London because the choice is no longer commuting five days a week or working locally. Only having to work two or three days in the office could mean that local employers find that staff leave for better-paid jobs in the centre of London and they have recruitment issues.</p>	<p>Different authorities have adopted slightly different interpretations and understanding of the general concept. Terminology and precise methodology may differ. However, the central aim of facilitating those who wish to live more locally by providing the opportunity to do so. The availability of shops and services to meet the essential needs of local residents is an extension of a long-established aim of local planning policy. Equally, it does not mean that individuals cannot access services, shops, cultural facilities, places of work and so on outside of their local areas.</p> <p>It is intended that neighbourhood boundaries are flexible; add wording to clarify there are no fixed zones.</p> <p>The adopted Local Plan includes a hierarchy of centres which categorises the borough centres from the principal centre of central Richmond to local parades of importance which may consist of only a handful of businesses. The Council produced a report looking into the distribution of convenience provision across the borough and to identify gaps in provision where residents lived more than 400 metres from provision. This research fed into the development and review of the centre hierarchy.</p> <p>The composition of the borough's centres is monitored annually through the Council's Town Centre Land Use Survey which covers approximately 2,500 properties.</p> <p>Policy 11 seeks mixed and balanced communities and recognises that affordable homes, including for key workers, are important to local communities. Additional wording has been added to refer to Living Locally in that policy; see also response to comment 765.</p> <p>It is not clear at this stage exactly how the pandemic will alter an individual's choice of place of work. However, it has been suggested that the pandemic may result in positive opportunities for areas such as Richmond, should individuals prefer to work at home more often on a more permanent basis which could assist in supporting local centres, for example Policy 22 supports flexible workspace and serviced offices in the borough's suburban town centre locations.</p>
90	Melanie Gurney, The Planning Lab, on behalf of the Royal Botanic Gardens	<p>RBGK support the concept of living locally and the 20-minute neighbourhood in general. We welcome many local visitors each year and run a number of festivals, events and exhibitions to encourage different audiences and repeat visits, alongside concessionary admissions (including as part of our universal credit programme offer); and other community outreach programmes.</p> <p>While RBGK actively encourage all visitors and staff to travel to the site by walking, cycling and public transport, this is not possible to enforce as an existing, internationally significant, major London visitor attraction and science research facility. Therefore, development in Kew Gardens cannot always meet Part (B) of the policy that suggests that a target of 75% of trips be undertaken by sustainable modes. Part C also requires all development to demonstrate how it will deliver improvements to support the locally living concept. However, many applications for RBGK relate to temporary events and installations, which will not always be able to demonstrate this. RBGK request that some flexibility is considered in relation to this policy for uses outside commercial and residential uses.</p>	<p>The target of 75% of trips by walking, cycling, and public transport is a Borough-level target set in the adopted Local Implementation Plan, and it may be that where justified individual developments would not be required to meet this target, however as much modal shift as possible is encouraged.</p> <p>It is recognised that not all development applications will be contributory to the Living Locally concept and a commensurate amount of detail to the scale of development would be all that is expected.</p>
91	Tom Dunbar	Yes, but as stated above there is an opportunity to increase and diversify the area of Twickenham Green. This is an expanding area and has little to offer especially as more people are now working from home. The Council should support local gyms, cafes, restaurants, and other amenities in the area.	Twickenham Green is being designated as a Neighbourhood Centre, rather than a Local Shopping Parade, owing to its importance locally as providing an increasingly diverse array of shops and services. See Policy 17. Further development appropriate to neighbourhood centre that supports the Living Locally concept is supported in principle.
92	Stephen Brooker, Walsingham Planning, on behalf of Whitbread Plc	Whilst the thrust of the Policy is generally supported, it is essential that this approach does not become parochial, the unequivocal wording of the Borough Living Locally policy runs this risk and should be modified to take account of the importance (and advantages to the Borough) of also attracting outside investment and activity, for example visitors and tourists.	It is hoped that by promoting our centres as vibrant and people-focussed, this will attract investment as more businesses choose to locate within the borough. The Borough boasts some of the finest green spaces in Greater London that attract visitors from all over the world such as the UNESCO World Heritage Site in Kew Gardens, and Richmond Park which is the largest park in London. Enhancing the vibrancy of our centres will ensure that these visitors stay longer in the Borough. The Plan should be read as a whole, and for example Policies 17 and 26 recognise the importance of visitors.

93	Victoria Barrett-Mudhoo, Lichfields on behalf of the West London NHS Trust	n/a	Noted.
94	Louise Fluker, The Richmond Society	Agree but with caveats about provision for less mobile residents who cannot walk or cycle: New developments should provide safe space for vehicles to drop off and collect elderly or less mobile passengers. The draft Plan highlights that Richmond has an ageing population whilst there is evidence of under occupancy of properties. Some of this may be because people are reluctant to downsize with all the expense incurred and there is insufficient housing provided for the elderly if they wish to continue living in Richmond. The Council could do more to encourage developers to provide housing more suited to older residents and provide incentives for people to downsize thus freeing up family accommodation. In the section on safer communities surely developers should be required to show explicitly how the plans for large developments have designed out crime.	Reference has been added in the policy to inclusive access and a new paragraph has been added to the supporting text which recognises that not all residents can comfortably walk or cycle and some still require the use of a car. Specific mention has been given prioritising the retention of disabled parking spaces and providing additional spaces where appropriate. Please see Policy 12 – Housing Needs of Different Groups for the Plan’s policy approach on downsizing. References have been added to the Council’s new Community Safety Strategy in the supporting text to Policy 51, and in Policy 28 the Secured by Design scheme is now referenced in policy along with encouragement to consult with the Metropolitan Police at an early stage in the supporting text.
95	Siriol Davies, Ham and Petersham Neighbourhood Forum	The 20-minute neighbourhood has parallels with the Neighbourhood Plan process in that it is a place based methodology which identifies neighbourhoods and analyses their character and needs, with the aim of conserving the identity and heritage, and providing the services and needs for the community. We note that on Map 4.1 Petersham is identified as having no local centres within the buffer zone and residents of Ham and Petersham are reliant on Richmond town Centre and Kingston Town Centre for many amenities, shops and services, albeit the road network is limited, public transport is limited to buses and improving infrastructure for sustainable and active travel to Kingston and Richmond is one of the objectives of the HPNP.	Noted.
96	Philip Briggs, Richmond Bat Species Action Plan Steering Group	This clearly has a wide range of benefits. From our perspective it's good to see this identified as an additional driver for "improving accessibility and connectivity of green infrastructure". It would be good to have something in about managing accessibility for people in a way that does not impact on biodiversity, particularly avoiding lighting green spaces at night as artificial lighting has a negative impact on nocturnal wildlife, and avoiding new infrastructure or public access that will negatively impact on wildlife.	Support noted. Please see policies 39 and 43.
97	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	We agree broadly with Policy 1 and the 20-minute neighbourhood.	Support noted.
98	Benjamin John	Any policy that encourages people from using their car to shop locally is to commended.	Support noted.
99	Eileen Folan	this will only work if rail services are protected. SWR cuts to Fulwell and beyond undermine efforts to reduce car use, and also impact on my local area Teddington. Also provision of local services such as banks. i am very disappointed that the four major banks have all closed in Teddington, resulting in shops refusing cash as nowhere to bank their takings. A better mix of shops in Teddington could be encouraged - greengrocer (no pre packed, plastic wrapped veg), butcher in high street, everyday clothing.	Unfortunately, rail services are not under the remit of the Council and beyond the scope of the Plan. The Council’s Local Implementation Plan sets out that the Council will work closely with TfL, Network Rail and South Western Railway to improve public transport across the borough. The Living Locally concept aims to enhance access to public transport which hopefully would encourage greater service provision by transport companies. The Policy and supporting text have been amended to place a greater emphasis on the need for mixed uses. However, please note that following the amalgamation of many commercial uses into Use Class E in 2021 it is exceedingly difficult for the Council to control this. By retaining Class E through the use of Article 4 Directions prohibiting the change of use to residential, it is hoped that market forces would regulate the diversity of commercial offering. See Policy 20 in relation to essential local shops and services.
100	Catherine Rostron	Where I live offers a prime example of an area which does currently support the concept of the 20 minute neighbourhood in a good way but which is currently under significant threat. Half of Kew Retail Park has just been sold to a developer who intends to build luxury flats. All the retail units other than Marks and Spencer will be lost to the community. Without the footfall to the other shops it is unlikely that Marks and Spencer will survive for long. Between 2001 and 2019 the population of Kew ward increased by over 27%. The retail park is the main non-tourist retail site in the area. Without it the 12,000 residents will be served by only a handful of corner shops. The retail park provides for most daily shopping needs within walking or cycling distance for Kew’s residents e.g. pharmacy, clothing, food and basic household goods. It goes a long way towards supporting a ‘20 minute neighbourhood’. Access along the tow path also provides a safe walking or cycling route which also benefits from lower levels of pollution. Without the retail park car journeys to the larger supermarkets around the periphery of Kew will have to increase (Richmond, Brentford etc) as will congestion and air pollution. While I support the need for more housing in London, particularly social housing, communities also need viable infrastructure. I can only really comment about my local neighbourhood, here it feels as if the facilities to support the ‘20 minute neighbourhood’ are in shorter supply than housing.	As set out in response to comment 624, the Site Allocation for Kew Retail Park does recognise that Kew Retail Park is well used and a popular retail destination, despite its location outside of a main or local centre. The Site Allocation also makes clear that the Council expects commercial uses to be retained on site, and that the mix of such uses, including retail, should be curated so that they add to the vibrancy and vitality of the new community. As Policy 1 sets out general principles, it cannot deal with every scenario, but the Council’s aspiration is that applying part C to an application will ensure that all the elements that contribute to “Living Locally” are fully considered. Add to the supporting text further clarity about how applicants are expected to demonstrate compliance with the policy.
101	Andrew Barnard	This is an idealistic vision which will not suit all in the community. Not everyone can walk or use a bike, nor indeed may they wish to. The policy risks creating 'islands' (were it to be implemented) with extensive duplication and/or significant costs. The Council's ability to make the investments envisaged is extremely limited and will depend on the private sector who will make judgements made based on commercial viability. However, the Council can help by reducing business rates and associated costs to encourage businesses to invest and employ staff.	The Policy has been amended to recognise that not everyone will be able to walk or cycle but that this should be supported, and appropriate facilitation be made to enable walking or cycling where this is currently unfeasible due to public realm, lack of opportunities to rest, distance too far, etc.

		Great care must be taken not to extrapolate the exceptional experiences of the past 2 years to build a vision for fifteen years hence. Changes in behaviour have been by force of circumstance. We live in close proximity to all the extraordinary assets of one of the world's major cities - London - and imagining that the inhabitants of Richmond will somehow turn in themselves over a strategic timeframe seems entirely unlikely.	The different centres will be permeable, and many people will be within the catchment of more than one centre. The centres are organised in a hierarchy based on the level of service provision and importance and not all centres will offer the same. At the very least, Local Shopping Parades provide basic needs and some services.
102	Paul Luton, Cycling UK	Improvement of walking and cycling availability should be required in all areas.	As can be seen on the 800-metre centre catchment area map, the vast majority of the Borough is within 800-metres of a centre. Improvements to walking and cycling will, therefore, be promoting in all areas. The Borough has an ambitious target of 75% of all trips being undertaken by walking, cycling, and public transport and the policy will aim to achieve this goal.
103	Lynda Hance	It's a nonsense to imagine that people living in a London Borough won't travel into Surrey or elsewhere in London to work, for shopping, for pleasure (theatres etc) to other transport hubs (Waterloo, Heathrow, the tube, etc). You have stated that Whitton isn't well served by transport links so this policy doesn't tie in with that.	The policy will not prevent residents from travelling and not all services or amenities will be offered within the Borough. The goal of the policy to increase choice by offering more everyday needs and services close to where people live to promote increased use of active travel and public transport.
104	Clare Snowdon	I love the 20 minute neighbourhood idea. It would be nice to see provision for people with disabilities here so that they can see how they fit into this neighbourhood	The Policy has been amended to recognise that not everyone will be able to walk or cycle but that this should be supported, and appropriate facilitation be made to enable walking or cycling where this is currently unfeasible due to public realm, lack of opportunities to rest, distance too far, etc.
105	Jim Brockbank	The policy of the 20 minute neighbourhood, living locally and encouraging easy access through active travel eg walking and cycling is excellent	Support noted.
106	James Armstrong, Richmond Cycling Campaign	RCC strongly agrees with Policy 1, and welcomes the strong commitment of the council to the Living Locally concept & 20 Minute Neighbourhoods. The measures included will go a long way towards leveraging the planning system to enable modal shift to Active and Sustainable Travel modes. We wish to ask for clarification regarding Policy 1C, Point 6. Is the wording intended to be interpreted such that relevant proposals must demonstrate how they will improve local walking and cycling routes, ONLY in areas with lower levels of public transport accessibility or higher levels of health deprivation and disability? If so, we would ask that this is amended such that major developments located in ALL PTAL levels must demonstrate how they will improve local walking and cycling routes. This is important because of the focus in Policy 2 on the direction of higher density development towards high PTAL level areas, which likely present the largest opportunities for gains in Active Travel use.	Support noted. This particular policy ask to demonstrate improvements was intended to be sought in areas with lower levels of public transport accessibility or higher levels of deprivation and disability. The supporting text at paragraph 4.11 is intended to refer to the spatial areas of deprivation and PTALs. For clarity, this is considered to go beyond the requirements of Policy 47.C which ensures developments provide a high quality walking and cycling environment within the curtilage of the development and in its near vicinity.
107	James Stevens, Home Builders Federation (HBF)	The HBF is the principal representative body of the house building industry in England and Wales and our representations reflect the views of discussions with our membership of national and multinational plc's, through regional developers to small, local builders. Our members account for over 80% of all new housing built in England and Wales in any one year. Recent research by the Government has estimated that housebuilders have made a significant contribution to the nation's infrastructure, providing some £21 billion towards infrastructure of all types including affordable housing since 2005. We have noted the site allocations and the rationale behind the 400 metre and 800 metre active travelling zones. In view of the relatively small size of the borough, and the constraints on the supply of land for housing, but the high levels of public transport connectivity - most locations are within 800 metres walking distance of a train or tube station and even those few areas beyond this distance are still a feasible distance to walk or cycle – every area of the borough should be considered capable of contributing to future housing supply. Nowhere should be placed off limits on grounds of public transport connectivity.	Policy 15 recognises the Areas for Intensification as set out in the London Plan, but this does not exclude development outside of those areas. The Council's aspiration is that applying part C to an application will ensure that all the elements that contribute to "Living Locally" are fully considered, not just public transport accessibility.
108	Lynne Bailey	In the same theme as my comments on Section 3, this policy feels like it is excluding the elderly and disabled. Not everyone is capable of walking or cycling for 20 minutes and doesn't want to be continually reminded of this! I am not suggesting you disregard the policy but, rather, expand it to cater for the less mobile in the borough. Remember that not everyone who is mobility limited has a blue badge. Please reword to show you are considering all residents and not simply disregarding some of the more vulnerable.	The Policy has been amended to recognise that not everyone will be able to walk or cycle but that this should be supported, and appropriate facilitation be made to enable walking or cycling where this is currently unfeasible due to public realm, lack of opportunities to rest, distance too far, etc.
109	Matthew Bolton	Policy 1 1 under point C should include the need to have a 'Healthy Streets' Transport Assessment for Major developments of 10 or more residential units or non-residential development of 500sqm of floorspace or more. Whilst the Local Plan Policy adheres to the same principles the TfL document categorises how developments should contribute to the TfL objective of healthy streets that promote healthy travel and environments. I would highlight the current council policy of offering 30 minutes free car parking to residents undermines the objective of the 20-minute neighbourhood. This scheme encourages motorists to drive to shops, often for short trips, as it incentivises them with 30 minutes free parking. This free parking should be cut down. This scheme also ensures that on street bays are often occupied when there would be considerably better uses to the high street public realm such as parklets, tree planting and cycle parking. To support the objective of living locally and 20 minute neighbourhoods, the council should consider reviewing the free parking scheme and put the revenue gained from parking receipts into public realm enhancements and cycle infrastructure improvements. I note the council has recently approved the East Twickenham public realm improvements which is commended. This should be replicated more widely through improving the pedestrian environment on all its High Streets. I would recommend Broad Street in Teddington as a potential priority area. This has two sides of car parking and narrow footways. Buses are frequently blocked due to the narrow road as a result of wide cars parking on both sides. These cars could comfortably be accommodated within the North Lane Car Parks, as shown in the Ellery Hall Transport Assessment. As a result, the pedestrian environment is not as good as it could be, which is a key component of the success of 20 minute neighbourhoods. I would add that free car parking and narrow footways along Hampton Hill High Street also undermines the 20 minute neighbourhood objective.	The requirement to follow the 'Healthy Streets Approach is set out in part B of Policy 1, in Policies 17 and 51, as well as underpinning the emphasis on Active Travel in Policy 47, and as set out in TP2 of the London Plan. It is therefore considered the requirements are clear and it does not necessarily need to be stated under part C. The provision of free car parking is beyond the remit of the Local Plan, although it is recognised that this can bring benefits to those with restricted mobility, and for short period of times aids deliveries and collections, which need to be considered along with the impacts. The Council will be led by whether there is space in highways/footways before considering any change to green space – see also response to comment 956. The Council has set up a Public Realm Investment Fund (PRIF) and, as reported to the Finance Policy and Resources Committee in September 2022 and a further update in February 2023, placemaking interventions have been identified in areas across the borough to support high streets.
110	EE McClelland	I have concerns about providing car-free development as many people will choose to park elsewhere on streets making congestion worse. I believe in a suburb like Teddington car use is often required as larger stores such as Sainsburys are distant and as a family-oriented town parents often require a car for baby and child transport. This is NOT always easy on public transport if you want your child to participate in activities with their peers.	The Policy has been amended to recognise that not everyone will be able to walk or cycle but that this should be supported, and appropriate facilitation be made to enable walking or cycling where this is currently unfeasible due to public realm, lack of opportunities to rest, distance too far, etc.
111	Mark Lawson	I will read the document in more detail on my laptop this evening. The implications and changes resulting from the Pandemic are certainly interesting and the Council seem to be preparing for those changes which are complex and varied. For example I happen to feel that non-mask wearing on public transport and crime in the Inner London boroughs is encouraging residents to stay local, certainly for their leisure time.	Support noted.
112	Anna Kendall	I have been living locally for 35 years. I hear my surgery has to move and would like it to move to the site described in sectopn7 as site allocation 9, so it stays local and can support initiatives such as the Whatsapp groups set up in Covid time for Albert Road and Park Road which helped with collecting prescriptions etc...	Noted. See the Site Allocation for Teddington Police Station and the response to comment 307.

113	Olivier Somenzi	let's not forget that a 20-min walk or bike ride might not be possible for everybody (older people, people with disabilities etc) - what's the plan for these vulnerable populations?	The Policy has been amended to recognise that not everyone will be able to walk or cycle but that this should be supported, and appropriate facilitation be made to enable walking or cycling where this is currently unfeasible due to public realm, lack of opportunities to rest, distance too far, etc.
114	Sue Clayton Smith	A great idea and goal but this will only be achieved if the local high streets are attractive and have an appropriate mix of outlets. There also needs to be good access to health and education, as well as sufficient green space so that it is not too overcrowded. Amenities need to be provided to such green spaces too, eg toilets on Richmond and Twickenham Greens to avoid the adjacent residential streets from being used as public toilets. Local walking and cycling routes to be enhanced and developed.	The Policy and supporting text have been amended to place a greater emphasis on the need for mixed uses. However, please note that following the amalgamation of many commercial uses into Use Class E in 2021 it is exceedingly difficult for the Council to control this. By retaining Class E through the use of Article 4 Directions prohibiting the change of use to residential, it is hoped that market forces would regulate the diversity of commercial offering. Recreational pressures on our green infrastructure are recognised in the Plan, such as Policy 37. Policy 51 seeks access to free public toilet facilities in major developments open to the public, and the site allocations for Twickenham Riverside and the place-based strategy for Richmond & Richmond Hill also refer to aspirations for provision of public toilets.
115	N Maureen John	Sounds good though again - I'm no expert and have only glanced at the document	Support noted.
116	David Marlow	<u>BUT</u> Council is ignoring residents with disabilities and the fact that not everyone can walk or cycle. See DJG comments. The planned Elleray Hall in Teddington is far less convenient than present building (as well as being of incongruous design and out of character). A site next to the Teddington Library and adjacent bus stops was rejected.	The Policy has been amended to recognise that not everyone will be able to walk or cycle but that this should be supported, and appropriate facilitation be made to enable walking or cycling where this is currently unfeasible due to public realm, lack of opportunities to rest, distance too far, etc.
117	Christine Duke	Agree for the most part with the ideal of the 20 minute neighbourhood. However, consideration needs to be given to the fact that not everyone is able to cover the same distance in 20 minutes and could take twice as long or more (40 min +) to get to local shops and amenities. After shopping etc. then having to another 40 + minutes to return home, exhausted and often in pain, makes far easier said than done. Also many elderly, disabled and vulnerable people are afraid to go out anywhere alone for fear of falling over, crime and other accidents etc. The condition of roads and footpaths will need to be improved greatly, across the Borough. Footpaths will need to be well lit and maintained. There will need to be more resting points/seats, more localised accessible toilet facilities, visible community policing. Clear enforcement of the ideal of "pavements are for people" is needed as many people are fearful of being hit or knocked over by electric scooter riders, and cyclists etc. using the pavements often at high speeds, and it is difficult for the less able to move out of the way to avoid an accident, more time is needed to cross roads, timed crossings do not allow enough time to cross safely. Overall would like to see the views of Disability charities and organisations sought for their input, so that their views can be taken on the reality of getting around for shopping, socialising etc.	The Policy has been amended to recognise that not everyone will be able to walk or cycle but that this should be supported, and appropriate facilitation be made to enable walking or cycling where this is currently unfeasible due to public realm, lack of opportunities to rest, distance too far, etc.
118	Hannah Blunstone, CBRE on behalf of Rugby Football Union (RFU)	As noted in response to Question 4 [See comment 33 in respect of the strategic vision] , the RFU support the living locally approach for access to essential services to fulfill daily needs. However, the vision and the corresponding policy (Policy 1) as currently drafted applies to 'all development, except householder applications', and needs to clarify exclusions for Twickenham Stadium as one of London's premier entertainment venues and an nationally significant sporting venue. To account for this, we would suggest that Policy 1 (Part C) be redrafted as described in the detailed response appended to this form. [See comment 269 in respect of Policy 1]	Support for the Policy is noted. Requirements of Criteria C are not onerous to demonstrate in a way that would satisfy the requirements of the policy and the needs of the stadium. As acknowledged in the representation, applicants are expected to demonstrate compliance with policies regarding transport, biodiversity, healthy streets, air quality and other such measures. This policy would only require consideration in the supporting planning documents how this compliance is in support of the Living Locally concept.
119	Mary Egan	The policy of the 20 minute neighbourhood is an excellent goal - ensuring access to food and necessities by creating attractive high streets, health and education by providing good open spaces and work good public transport as well as access to recreational and cultural areas. Developers should comply with these aims, by creating well designed and finished low rise housing with adequate on site parking. Local walking and cycling routes should be increased.	Support noted.
120	David Abel	Having sounded negative in my previous answers it would be churlish of me not to fully applaud this. It's an excellent idea so long as it incorporates things like access to a GP surgery	Support noted.
121	Philip Villars, WSP on behalf of Sharpe Refinery Service Limited	The Arlington Works site is within a short walk of the local centre of St Margaret's and other local facilities such as parks, train and bus services. The Arlington Works site has the potential to positively contribution towards the 20-minute neighbourhood of St Margarets.	Noted.
122	Alice Shackleton, on behalf of The Kew Society	- in principle, The Kew Society is supportive of this concept - there are some requirements for this to work: one is that a high density of residential development is required in order for there to be a large enough population to support a "living locally" environment - to have businesses, education, health, culture, retail and other elements of a viable community as envisaged. - This concept is fine if one is mobile. Whilst the increasing proportion of ageing people in the Borough population is noted, there needs to be more recognition that even those who are relatively mobile may not be able or want to walk or cycle for twenty minutes or at all and also may not be able to carry grocery shopping, for example. They may need carers who themselves may need a vehicle to cater for their needs (and travel to various customers). Not to make provision for these needs risks excluding a growing part of the population. - Within Kew the distance to walk to Kew Gardens Station and bus stops for the older people can be daunting, for example, it is a significant distance from the Kew Riverside development to the Underground station. It may be a short distance for a fit young person who could walk or cycle. - The draft Local Plan considers the increasing ageing population in terms of adult social care rather than in meeting their needs for transport. Many of the older population are relatively fit but not comparable to the young and so not able to walk or cycle to meet all their needs.	Support noted. The Policy has been amended to recognise that not everyone will be able to walk or cycle but that this should be supported, and appropriate facilitation be made to enable walking or cycling where this is currently unfeasible due to public realm, lack of opportunities to rest, distance too far, etc.
123	Jon Burrell	Totally support active travel and cycling but something needs to be done about high rates of bike theft which undermine this.	Support noted. The Local Implementation Plan sets out how crime and fear of crime can be addressed, such as through assessment of lighting levels through parks and other open spaces. Policy 48 refers to the London Cycle Design Standards to deliver cycle parking that is secure and well-located.
124	Hilary Pereira, River Thames Society	Not a matter on which comments from the RTS would be appropriate	Noted.
125	Laura Hutson, Sport England	Sport England is fully supportive of this policy which helps create environments that make it easier to be physically active. This is also in line with our Active Design guidance as outlined below. [See comment 945 in relation to Uniting the Movement and Active Environments]	Support noted.

126	Bridget Fox, on behalf of the Woodland Trust	Support B8. "improving accessibility and connectivity of green infrastructure".	Support noted.
127	Joanna Childs	Nice idea, but the whole point of living in a city is access interesting jobs and culture otherwise we'd all live in Tavistock. Will you relocate the Financial Services sector, the ROH, British Museum, RA, National Gallery, Barbican etc to LBRUT? In pre-industrial London fisherman dried their nets by Kew Bridge and had no bathrooms.	The 20-minute neighbourhood concept is intended to encourage the development of vibrant communities that enable residents to complete everyday tasks such as shopping and accessing essential services by foot, bike, or public transport. This is achieved by ensuring residents are within 20 minutes' walk from a town centre, local centre, neighbourhood centre, or local shopping parade in line with Policies 17 and 18, or other smaller concentrations of local shops and services in line with Policy 20.
128	Joan Gibson	Would think some policies to encourage active travel such as green routes, and exercise information would help folks leave the car at home without costing LBRuT a fortune. Hounslow's beat the streets is a good example which has been shown to work. Also planning need to change so they take a wider view of developments and make sure any changes include through routes to improve walking / cycling. For instance cut throughs from Redfern Avenue to Heathfield rec could have been organised with the THS development. Have any cut throughs been organised for the Brewery development etc. etc.	The Council has published an Active Travel Strategy in 2020 and Richmond Public Health has introduced a Physical Activity Plan 2021-2031 which both seek to increase physical activity in the borough.
129	Max Millington	I am wary of the numerous references to cycling: more cycle lanes and rights for cyclists are not to my mind the answer for Richmond. The needs of pedestrians, public transport users and drivers (of less polluting vehicles) should not be deprioritised. I don't think it is right to say LBRuT needs to be more locally dependent - a great many residents work and have educational requirements in Central London and in the wider area, so it would be inappropriate not to provide adequately for that.	Increased number of cycle lanes will reduce conflict with pedestrians and drivers and make for overall safer streets and roads. The policy aims to provide more choice locally by increasing access to our centres by walking, cycling, or public transport. It does not seek to restrict access to other parts of London. Access to Central London will be retained by cycling, public transport, or car.
130	Peter Willan and Paul Velluet, Old Deer Park Working Group	We agree broadly with Policy 1 and the 20-minute neighbourhood.	Support noted.
-		Note comments on site-specific allocations (including in relation to Site Allocation 9: Teddington Police Station) have generally been collated in Table 6 below.	

Table 4: All responses received (to question 7 on the [response form](#)) in relation to Policy 2. Spatial Strategy: Managing change in the borough (section 4 of the draft Plan) (as received) and the Council's response
(note general comments in relation to Policy 2 are also set out in Table 6 below)

Rep No.	Name	Comment	Council's response
131	Caroline Wren	Broadly speaking this section all makes sense: welcome the commitment to brownfield development and sensitivity to place-based character in design, consideration of embodied carbon, and the other principles.	Support noted.
132	Robert Blakebrough	Certainly do not agree with Policy 2 -A "higher density development including homes," Complete madness in a city/country already hugely over populated i.e. UK population has increased approx. ten fold in the last 300 years. Solutions should look at reducing population as current situation is unsustainable	The NPPF requires us to meet the development needs of the area, to provide for objectively assessed needs for housing and other uses. It expects a Local Plan to optimise the use of land, expecting an uplift in density of residential development in city and town centres and other locations well served by transport. The London Plan sets the Council's housing target and directs incremental intensification to existing residential areas within high PTALS or close to stations or town centres. Therefore it is not possible to take an approach that considers we are over populated and resist higher density development including homes.
133	Jon Rowles	This sounds OK in practice, however, as the council is adopting a 20-meter walking distance/800-meter buffer development can take place in 95% of the borough. Development needs to be directed towards the 200-meter buffer, and to a lesser extent, the 400-meter buffer - and these need to be actual walking distances. Section B - the presumption in favour of refurbishment could end up being a 'maladaptation' as converting buildings can involve using more carbon. Reading through the research - it's often the case that only 'lite' refurbishment saves carbon. It also does not consider the benefits of intensification that rebuilding can bring to town centres and the reduced need to build on green land in the countryside. Rebuilding also saves carbon after about 30 years and most domestic buildings will last over 100 years – so on that timeframe it is the right thing to do. I get the impression the council is trying to make development more difficult. With the high property prices in the borough, most refurbishment schemes are very intensive with places often gutted back to the shell - and then most of the shell is often replaced too. There would have to be some very robust calculations to show that refurbishment uses less carbon.	The focus on Living Locally is considered an appropriate concept for the borough; and further details are added to the supporting text in Policy 1 as to how the 800m relates to the borough, but clarifies this is not measured as an absolute geography, and there are no fixed zones or boundaries. The Plan places emphasis on reuse and conversion of existing buildings to minimise embodied carbon with a presumption in favour of refurbishment set out in Policy 2. The Council has prepared a Net Zero Carbon Study to support several policies in the Plan which set out ambitious targets for Richmond. There is no one-size-fits all approach or solution to accommodating sustainable energy measures in the historic environment, and further details are added to the supporting text of Policy 4 to recognise this conflict and how it is expected to be addressed on a case by case basis. The need to avoid maladaptation has been added to Policy 29.
134	Melanie Gurney, The Planning Lab, on behalf of the Royal Botanic Gardens	RBGK generally agree with this policy. However, request that Part (A) of the policy reflects that higher density development, which is directed to sites in the town centres or highly accessible spaces, should also have regard to the impact on townscape character, heritage assets, and key views. Each application for development must be assessed on a case-by-case basis, and just because a development is proposed for a highly accessible, town centre location, does not necessarily mean that it will be acceptable in townscape and heritage terms. RBGK also seek clarification on the "key diagram" on page 28. A large proportion of Kew Gardens is designated as an "incremental intensification area", as well as an "area deficient in public open space". The Royal Botanic Gardens at Kew is a World Heritage Site; located in a Conservation Area; registered as a Grade I Registered Park and Garden of Special Historic Interest; and manages a total of forty-six listed buildings and structures. It provides approximately 300 acres of open space and gardens, and is heavily protected in policy terms, therefore it is unclear why these designations have been partially applied to Kew and its immediate setting, which is also very sensitive. RBGK request that these designations are removed, or their relevance to Kew Gardens be clarified in the policy text.	Noted and agree every decision is assessed on a case by case basis - the Plan should always be read as a whole; this particular policy would not override other policies. However, it is considered important that this is a policy seeking to convey the spatial strategy, and adding cross-references and caveats could undermine what it is seeking to articulate. In respect of the key diagram and the areas of public open space deficiency, only sites publicly accessible are included in the assessment, so any sites which people cannot access freely, are not included – such as Royal Botanic Gardens Kew. The Public Open Space deficiency areas have been updated in Policy 37 to reflect the 2023 study, and continues this approach. That is not to say it does not make an important contribution towards provision.
135	Tom Dunbar	I agree but the growth needs to be proportionate to a) the need to protect green / open spaces; b) to ensure the right infrastructure and amenities are in place to meet needs (especially public transport).	Noted, and these priorities are mentioned in Policy 2.

			<p>The Council places great importance on the borough's green spaces and other open spaces, and the Plan contains clear and consistent policies intended to protect, enhance, and provide additional open space both in the public and private realms. The Council will also require developments to provide a Biodiversity Net Gain (BNG) so that any proposed loss will not only be replaced but will result in an enhanced provision. Please see policies 34-39 for more information.</p> <p>Policies 49 and 50 set out the Council's policies regarding social and community infrastructure and education facilities. The Council supports the provision of other essential services and infrastructure such as transport and health. However, the Council itself has limited control over many aspects of this provision and relies on infrastructure providers, service delivery organisations, strategic bodies, developers and landowners, as set out in the new section on Implementation of the Local Plan.</p>
136	Stephen Brooker, Walsingham Planning, on behalf of Whitbread Plc	Policy 2 [A] fails to recognize that there are reasonable opportunities for the redevelopment of existing sites which lie outside of town and district centres and which may not enjoy good public transport connections but which can nonetheless make useful contributions to the Borough.	Policy 2 is seeking to direct new higher density development in the town centres or places that are well connected. The London Plan sets out a town centres first approach, and also prioritises sites that are well connected by public transport. It is reasonable in a strategic policy to not refer to out of centre development which may not be well connected. That does not mean the useful contributions from existing sites will not be recognised. Any proposal is considered on a case by cases and subject to all other Plan policies, so it may be possible to demonstrate there are no unacceptable impacts identified.
137	Victoria Barrett-Mudhoo, Lichfields on behalf of the West London NHS Trust	n/a	Noted.
138	Louise Fluker, The Richmond Society	We agree with the general approach and that the Plan identifies the specific challenges to LBRUTC in meeting its targets of affordable housing because so little land is available. To that extent focusing on reusing land is sensible. There is however an issue which is not sufficiently debated which is that the Council has identified that most of the CO2 emissions are from domestic consumers yet the housing stock in Richmond is old with specific areas containing many historic and listed buildings, it is unclear how both objectives can be reconciled (i.e. preserving historic buildings vs modernising them sufficiently)	The Plan places emphasis on reuse and conversion of existing buildings to minimise embodied carbon with a presumption in favour of refurbishment set out in Policy 2. Policy 3 recognises that extensive retrofitting will be required to decarbonise Richmond's existing building stock and will actively promote retrofitting of existing buildings through low-carbon measures. There is no one-size-fits all approach or solution to accommodating sustainable energy measures in the historic environment, and further details are added to the supporting text of Policy 4 to recognise this conflict and how it is expected to be addressed on a case by case basis.
139	Siriol Davies, Ham and Petersham Neighbourhood Forum	A. Ham and Petersham also has a very low PTAL. We note that Ham Close redevelopment (site allocation) would lead to a significant increase in residents and trips, which need to be met by associated services, public transport and active travel infrastructure. B. It is good to see recognition of embodied energy and support for reuse and conversion of existing buildings to minimise embodied carbon with a presumption in favour of refurbishment, however reference to retrofitting/ deep retrofitting should be included here so that when buildings are refurbished they are also upgraded to improve the fabric performance to achieve net zero by 2050, and to make a strategy which addresses the challenge of retrofit in conservation areas.	In relation to A, the limited options for access in Ham and Petersham are referenced in the place-based strategy, along with the Neighbourhood Plan requirements for higher levels of cycle storage due to the poor accessibility. I note under consideration of the planning application on the site, a draft Travel Plan included the objective to reduce the number of car trips by 5%, due to the low PTAL for the area, and recognised opportunities to encourage walking and cycling, and car club membership. Overall with the proposed mitigation, the site layout and connections to the existing road network and the level of parking were considered to pose no severe threat to highway safety and convenience, subject to conditions and a legal agreement. Note support for B. See also response to comment 138 and the further details added to the supporting text of Policy 4.
140	Philip Briggs, Richmond Bat Species Action Plan Steering Group	Really good to see the commitment to growth being delivered in a sustainable way, with supporting infrastructure, while tackling the climate emergency and biodiversity crisis, limiting new housing to already developed land.	Support noted.
141	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	We agree broadly with Policy 2, Spatial Strategy: Managing Change in the borough.	Support noted.
142	Carolyn Doughty	It is crucial that South western railways are encouraged to maintain the previous level of service from Shepperton to London Waterloo. The current reduction in train results in severe disruption to commuting times and overly busy trains, particularly at peak times.	Unfortunately, rail services are not under the remit of the Council and beyond the scope of the Plan. The Council's Local Implementation Plan sets out that the Council will work closely with TfL, Network Rail and South Western Railway to improve public transport across the borough
143	Deborah Waddon	The opportunity to receive affordable housing is extremely limited. It is very sad the opportunity is not there to those that have grown up here and worked here to support the local economy and to continue to be a support to their families have little or no chance of affordable accommodation.	Affordable Housing is designated as a Strategic Policy in the Local Plan. The Council has set an ambitious target for 50% of all housing delivered in the borough to be affordable housing over the plan period. Please see Policy 11 for more information, as further details are added to refer to providing genuinely affordable homes for local key workers.
144	Paul Luton, Cycling UK	"places that are well connected by.....cycling". In an area the size of Richmond borough all there is no reason why all places should not be readily accessible by cycling especially taking into account e-cycles. Perhaps question forecasts of demand for retail space given growth in on-line shopping.	Noted. The Retail & Leisure Needs Study has taken into account online shopping, and while it is difficult to predict longer term implications they have used both the household survey and Experian projections to inform forecasts.

145	Faye Wright, Forward Planning and Development on behalf of BMO Real Estate	In relation to Part B, we agree that prioritising the use of previously developed land, including the reuse and conversion of existing buildings to minimise embodied carbon with a presumption in favour of refurbishment will deliver growth in a sustainable way. The continued use and reuse of listed buildings should also be prioritised and it should be recognised that the conversion of listed buildings to alternative uses may secure their future, thereby representing sustainable development.	Support noted. Please see Policy 28 regarding listed buildings. See response to comment 138 which recognises a case by case approach to sustainable energy measures in the historic environment.
146	Clare Snowdon	I would like to see strong policy on protecting habitat and connectivity of green spaces - for instance designating the Sainsburys St Clares car park as MOL and the introduction of urban hedgerows, support for Nature-Connected Neighbourhoods etc	The Council places great importance on the borough's green spaces and other open spaces, and the Plan contains clear and consistent policies intended to protect, enhance, and provide additional open space both in the public and private realms. It recognises the multi functional network, including corridors and stepping-stone sites. The Council will also require developments to provide a Biodiversity Net Gain (BNG) so that any proposed loss will not only be replaced but will result in an enhanced provision. Please see policies 34-39 for more information. Note the Open Land Review (Green Belt, MOL, LGS and OOLTI) examined the performance of existing designated open space against relevant national, regional and local purposes and criteria – for MOL the criteria are set by the London Plan.
147	Jim Brockbank	The 'living locally' concept makes a lot of sense. But paragraph B11 which relates to the Major's Healthy Streets Approach to encourage walking and cycling are the choices made for local journeys is significantly let down if the health and social care facilities locally are not 'fit for purpose'. This is relevant to the proposal for site allocation 9 at Teddington Police Station- see below. The local plan acknowledges that there are limited opportunities for development in the locality and the opportunity to develop the site allocation 9 as a community / social infrastructure should not be missed	Noted, and Policy 49 seeks to ensure adequate provision of community services and facilities, with Policy 51 also supporting health and social care facilities. The Site Allocation for Teddington Police Station already makes clear that redevelopment of the site will only be acceptable if a community/social infrastructure use is re-provided on the site, such as for a medical/health use.
148	James Armstrong, Richmond Cycling Campaign	RCC agrees with Policy 2, noting with particular interest the proposal to direct higher density development towards areas that are well connected by public transport, walking and cycling. If Policy 2 was to be improved, note could be made of the need to avoid further development in areas that would encourage motor vehicle use.	Policy 2 is seeking to direct new higher density development in the town centres or places that are well connected. The London Plan sets out a town centres first approach, and also prioritises sites that are well connected by public transport. However, the NPPF requires us to meet the development needs of the area, to provide for objectively assessed needs for housing and other uses, and expects a Local Plan to optimise the use of land, therefore it would be difficult to avoid further development in certain areas if other policies in the Plan could be addressed. Clearly the Plan as a whole seeks to contribute to a modal shift away from the car, to minimise residents' trips made by car.
149	Mark Lawson	I think we all appreciate that we live in the Royal Borough of Richmond for a reason. Intentions are honourable.	Support noted.
150	Graeme Fraser-Watson, The Teddington Society (Planning Group)	See Question 10 [comments added under Section 7 Place-based Strategy for Teddington & Hampton Wick in Table 6]	See response to comment 300 in relation to the place-based strategy for Teddington & Hampton Wick.
151	Sue Clayton Smith	Plans for housing, retail and employment related development need to also take into account the impact on the local environment and in particular the need for accessible green spaces for exercise and relaxation.	The Council places great importance on the borough's green spaces and other open spaces, and the Plan contains clear and consistent policies intended to protect, enhance, and provide additional open space both in the public and private realms. The Plan recognises the importance of providing open spaces on-site as part of new development. The Council will also require developments to provide a Biodiversity Net Gain (BNG) so that any proposed loss will not only be replaced but will result in an enhanced provision. Please see policies 34-39 for more information.
152	N Maureen John	Generally agree	Support noted.
153	David Marlow	BUT the Council is not reusing the present safe, enclosed, popular amenities of Diamond Jubilee Gardens (which in fact was the rubble from the former swimming pool, very eco efficient). Proposal is <u>not</u> an overall enhancement of environment, local character - and certainly not another pub - we have plenty of pubs in Twickenham.	The Site Allocation for Twickenham Riverside seeks a comprehensive redevelopment including to provide high-quality public realm, and improvements to the riverside and open space. The Retail & Leisure Needs Study does identify a need to provide space for the food & beverage sector. See also response to comment 543.
154	Christine Duke	Agree with some, disagree with others. - Do not agree with the plans/strategies to direct major developments into the five town centres of Richmond, Twickenham, Teddington, Whitton and East Sheen. Consider that this would be disproportionate and unfair overdevelopment of the respective townscapes which would lead to further congestion and pollution as well as concrete sprawl in each of the respective areas and could well lead to undesirable discord and division between local residents and business interests. - Do not agree that dispersing the major developments across the borough would/could create unsustainable patterns of development, rather consider that doing so would evenly distribute both the benefits and disbenefits of the same. - Agree with repurposing pre-used sites and buildings. - Do not agree with the need to develop high rise building anywhere in the Borough. - Suggest sites/buildings could be used/purposed for shared use, needing less development overall.	See response to comment 132. The Plan prioritises the use of previously developed land, including the reuse and conversion of existing buildings to minimise embodied carbon with a presumption in favour of refurbishment set out in Policy 2.
155	Hannah Blunstone, CBRE on behalf of Rugby Football Union (RFU)	The RFU support the Local Plan objective to direct new higher density development to places that are well connected to jobs, services, infrastructure and amenities, as well as town centres. The supporting text to Policy 2 references the boroughwide Open Land Review alongside other studies which have been undertaken to form the basis for a holistic understanding of the borough's constraints and capacity for growth. The supporting text states that: 'the majority of the MOL has been assessed as performing strongly, with some areas scoring weakly against the MOL criteria'. Part of the Twickenham Stadium land parcel is within the Kneller Chase Bridge MOL area (no. 36 in the Open Land Review). The Review confirms: 'The eastern edge of the parcel, hard standing associated with Twickenham Stadium, meets none of the MOL criteria and it is recommended that its MOL status is considered further'. This needs to be acknowledged in the Site Allocation 13.	Support noted. See response to comment 935.

		Further commentary on this point and Draft Policy 35 and the MOL Policy Map designation is provided within the attached detailed response letter. [See comment 935 in respect of Policy 35]	
156	Mary Egan	Plans to meet the needs for Housing, Retail and Employment should be taking into account the urgent need for oases of nature, however small, to refresh, educate and make the citizens of Richmond able to exercise healthily and enjoy the spaces available especially in the urban environment.	The Council places great importance on the borough's green spaces and other open spaces, recognising the role of green oases, and the Plan contains clear and consistent policies intended to protect, enhance, and provide additional open space both in the public and private realms. The Plan recognises the importance of providing open spaces on-site as part of new development. The Council will also require developments to provide a Biodiversity Net Gain (BNG) so that any proposed loss will not only be replaced but will result in an enhanced provision. Please see policies 34-39 for more information. Amends to Policy 37 add reference to the importance of active environments.
157	David Abel	I strongly disagree with building intense developments anywhere in the borough, but particularly where the affordable housing provision forces poorer families into spaces a fraction of the size of others. I also do not agree that plonking a massive development or developments in to an area will be beneficial to that area - the new Mortlake Riverside development will have a devastating affect on East Sheen for example.	See response to comment 132 that sets out the need for development and making efficient use of land. Policy 13 states that new homes significantly above the minimum space standard that do not make efficient use of land will be resisted. The supporting text to Policy 11 expects the creation of mixed and balanced communities in new development, with the same standards to be applied to all new developments.
158	Philip Villars, WSP on behalf of Sharpe Refinery Service Limited	We welcome that the Council has recognised that the use of previously developed land can contribute to housing targets which accords with the London Plan.	Support noted.
159	Alice Shackleton, on behalf of The Kew Society	We agree with this but note that this will have to address the challenge of accommodating protection of protected open lands and heritage assets with satisfying perceived strategic needs as highlighted in A to D of Policy 2 and the accompanying paragraphs	The Council places great importance on the borough's green spaces and other open spaces, and the Plan contains clear and consistent policies intended to protect, enhance, and provide additional open space both in the public and private realms. There is protection for designated open land and nature conservation sites, in addition to heritage assets. Please see Policies 28 and 34-39 for more information.
160	Hilary Pereira, River Thames Society	Not a matter on which comments from the RTS would be appropriate	Noted.
161	Bridget Fox, on behalf of the Woodland Trust	Support C. "Development in the borough will promote the provision of green infrastructure that creates resilience and helps mitigate the impacts of climate change".	Support noted.
162	Joanna Childs	Strongly disagree with the proliferation of tall buildings. Incidents such as Grenfell have shown that while these can be safe when first constructed it is difficult to control this thereafter. They blight the landscape, cast deep shade over their neighbours, generate wind tunnels and put huge pressure on local infrastructure. Are we planning to incarcerate our children in towers and allow them out now and then for organised sport on astroturf?	Noted. Tall buildings can make a positive contribution to urban design and optimise the use of land, and the Council has responded to the London Plan by undertaking an Urban Design Study to develop an overall strategy for potential development and/or increased height across the borough. Policies 28 and 46 refer to consideration of the local micro-climate. It is recognised that tall buildings have an impact on the microclimate, and the Urban Design Study contains design guidance on factors to consider during the design development. Details on fire safety are added to Policies 44 and 45.
163	Peter Willan and Paul Velluet, Old Deer Park Working Group	We agree broadly with Policy 2, Spatial Strategy: Managing Change in the borough.	Support noted.
-		Note comments on site-specific allocations (including in relation to Site Allocation 9: Teddington Police Station) have generally been collated in Table 6 below.	

Table 5: All responses received (to question 8 on the [response form](#)) in relation to the place-based strategies (sections 6 to 14 of the draft Plan) (as received) and the Council's response
(note general comments in relation to the Place-based strategies and site allocations are also set out in Table 6 below)

Rep No.	Name	Comment	Council's response
164	Caroline Wren	<p>Only a few comments:</p> <ul style="list-style-type: none"> • are we happy that the artificial grass pitch (3G) mentioned for Richmond College is appropriate, given the importance for the environment of good drainage in the areas by the river (set out clearly in the Strategic Flood Risk Assessment doc)? I'm guessing it's for financial reasons but I'm not sure that the extra revenue potential, or the cost savings on maintenance, are sufficient to justify a large artificial grass pitch in an area liable to flood? • relatedly, LBRuT is supposed to be working with the EA, Thames Water Utilities & TfL to create a flood channel running parallel to the Thames, upstream from Richmond - it was recommended in 2010 but still not approved - is this plan the place to address that? • Teddington weir was also mentioned in that SFRA as an asset that needed improving - what's the plan? • Fulwell's strategy was unclear and poorly developed (in Hampton Hill area): it's one of the few places in the plan which is described as having a vague character and not hanging together all that well, but the doc doesn't really go into any details about what might be enacted as a result - can we have more explanation on the vision here? 	<p>See Policy 37 and additional details added on artificial grass pitches including assessing impact on surface water drainage. Drainage tends to be optimised for effective playing conditions, as the key benefit tends to be for reliable intensive sporting use.</p> <p>Policy 8, the Strategic Flood Risk Assessment (SFRA) and the updated Infrastructure Delivery Plan refer to the latest on the River Thames Scheme. The outline business case for funding was agreed in 2021, and a consultation on plans closed in 2022; it will be subject to a Development Consent Order and detailed planning and design work is underway. The scheme includes the improvements to Teddington Weir where five new gates will be built to increase capacity.</p> <p>Fulwell Bus Garage is now addressed in a new Site Allocation, covering the surrounds and expectations for future development opportunities.</p>
165	Jon Rowles	<p>The key diagram - the areas for intensification overshadows areas of MOL and green belt. the shading should not go over these areas to make clear the council is not opening these areas up for development.</p> <p>The division of the borough up into 9 high-level places - rather than the previous 14 villages means that the council is moving away from livable neighbourhoods. Disadvantaged areas such as Heathfield and Hampton North are likely to lose out under this approach.</p> <p>The strategies and other initiative sections, look like they have been put together quickly by reviewing old documentation and that the engagement and empirical research that would normally go into preparing a new plan has not taken place. Many areas of outer London are suffering from relative decline due to the</p>	<p>The policy on incremental intensification encourages development in the broad areas as described in the London Plan; it is considered clear that MOL and Green Belt policies would need to be considered as the Plan should be read as a whole. Update the Key Diagram mapping to reflect other Policies Map designations in the Plan.</p>

		<p>improvements to inner-city living many younger people (20-40) prefer to live in central London and this has skewed the demographics in the borough. I would expect to see more details on how the different areas will be regenerated.</p> <p>Hounslow in comparison to proposing a large number of public transport improvements whilst Richmond is only talking about cycling. The quality of life for people living in areas such as Fulwell and Hampton would be massively improved if Crossrail 2 was built but this local plan is not championing it, and also seems happy for the poor rail services and low PTAL ratings to continue.</p>	<p>See response to comment 644 on the methodology for defining the boundaries of the characters areas set out in the Urban Design Study. This is not moving away from liveable neighbourhoods.</p> <p>As set out at paragraph 5.3 in the Reg 18 Plan, the place-based strategies have been informed by the Ham & Petersham Neighbourhood Plan, Twickenham Area Action Plan and the Village Plan SPDs, updating as necessary, and drawing on details of the Urban Design Study prepared to inform this Local Plan. The level of detail is considered appropriate for the Plan.</p> <p>The Living Locally concept aims to enhance access to public transport. The Council's Local Implementation Plan sets out that the Council will work closely with TfL, Network Rail and South Western Railway to improve public transport across the borough.</p>
166	Melanie Gurney, The Planning Lab, on behalf of the Royal Botanic Gardens	<p>RBGK generally agreed with the placebased strategies. However, have some comments on, and seek clarification on, a number of policies as set out in section C of this form below, in relation to: - Policy 2 (Spatial Strategy), particularly Part (A) and they key diagram on page 28; - Section 12 (Place-based strategy for Kew); - Site allocations 32 and 33; - Policy 4 (Minimising greenhouse gas emissions and promoting energy efficiency), specifically Part (D) and Part (E); - Policy 5 (Energy infrastructure), specifically Part (C); - Policy 26 (Visitor economy); - Policy 29 (Designated heritage assets), specifically Part (A)(3) and Part F; - Policy 31 (Views and vistas); - Policy 32 (Royal Botanic Gardens, Kew World Heritage Site); - Policy 45 (Tall and mid-rise building zones). - Policy 47 Sustainable travel choices), specifically Part I [See comments 617, 633, 637, 677, 691, 853, 875, 892, 898, 1026, 1053].</p>	Noted.
167	Victoria Barrett-Mudhoo, Lichfields on behalf of the West London NHS Trust	<p>West London NHS Trust supports the principle of place based strategy for Ham, Petersham and Richmond Park (Section 10) and the vision to build on the identity of Ham and Petersham as a sustainable mixed community giving greater opportunities to live and work. The Trust particularly supports the continued recognition in the policy of the Cassel Hospital site for development. We note that the text states that "There is also an opportunity if Cassel Hospital is declared surplus to requirements (Site Allocation 23, Neighbourhood Plan Policy Q5) for conversion to community facilities." In line with the adopted Site Allocation wording, this wording should reflect that potential redevelopment for residential uses could be considered. We therefore request that the wording is amended to "...for conversion to community facilities and / or potential redevelopment for residential uses."</p> <p>We comment further on the site allocation in response to Question 9. [See comment 582 in relation to Cassel Hospital]</p>	<p>General support for the Cassel Hospital Site Allocation noted. With regards the amendments to the place-based strategy text, the Site Allocation makes clear that social and community infrastructure uses are the most appropriate land uses for any development proposal (if the site and hospital are declared surplus to requirements). It then also states that conversion or potential redevelopment for residential uses "could be considered if it allows for the protection and restoration of the listed buildings". The supporting bullet points in the Site Allocation clarify that "only if other alternative social or community infrastructure uses have been explored and options discounted in line with other policies in the Plan", would a residential-led scheme be considered as a potential redevelopment option (with policy-compliant affordable housing). The supporting bulleted text also references the application of Local Plan Policy 49, which removes the need for an alternative social infrastructure use (or submission of marketing evidence) where a scheme comes forward for redevelopment or change of use to 100% genuinely affordable housing. A further supporting paragraph acknowledges that conversion or potential redevelopment for residential uses "may be needed to support the protection and restoration of the listed buildings", stating that residential uses should, however, "be limited to the minimum necessary to achieve viability".</p> <p>There is therefore the potential for the principle of a residential use to be appropriate, though this would be subject to certain circumstances, i.e. the provision of 100% genuinely affordable housing or demonstration that the residential uses are required in an enabling capacity for heritage and conservation reasons. However, social and community uses remain the most appropriate land uses. As a general point, the place-based strategies include only brief references to the Site Allocations and a short sentence on their primary aspirations/development opportunity. It is expected that a developer and/or decision-maker would refer to the full text of the Site Allocation itself when developing/assessing a scheme, as well against the Local Plan as a whole. In this case, that the place-based strategy text does not list in full all of the potential appropriate land uses (which would also need to include the circumstances in which they would be considered appropriate), does not preclude a different development from coming forward and considered against the Site Allocation text and policies in the Local Plan. No amendments to the place-based text are therefore necessary.</p>
168	Louise Fluker, The Richmond Society	<p>Place based strategy for Richmond Park: we agree with the strategic objective that Riverside (E2) has a high sensitivity to change, due to openness and visual aesthetic of the area. Richmond Park (E3) is recognised as having high sensitivity to change, with the high value and susceptibility of the areas meaning that significant change is unlikely to be appropriate.</p> <p>Place based strategy for Richmond Hill and Richmond: we agree with the overall strategy but the devil is in the detail and getting the right balance between attracting visitors but not to the detriment of residents is very difficult</p> <p>Piloting a clean air zone is good in principle but again it's the detail that matters. The biggest polluters are the heavy goods vehicles and buses. Reducing their emissions would help significantly.</p>	<p>Noted.</p> <p>The purpose of the Plan is to set out the factors that need to be assessed, for example when considering the benefits of visitors and the impact on existing residents, to enable the planning balance at assessment stage of an application.</p> <p>See response to comment 584 on the progress of the clean air zone pilot.</p>
169	Siriol Davies, Ham and Petersham Neighbourhood Forum	<p>PLACE-BASED STRATEGY FOR HAM, PETERSHAM & RICHMOND PARK</p> <p>The Local Plan character analysis identifies 3-character areas, whilst the Neighbourhood Plan adds a more detailed differentiation of areas. p.91</p> <p>We welcome reference to Neighbourhood Plan and that they should be read together. It notes and the Neighbourhood Plan was prepared in the context of the 2018 Local Plan and previous iteration of the London Plan. It notes where the Neighbourhood Plan diverges from the Local Plan, justified through local evidence. p.92</p>	<p>Noted support, including the reference in the place-based strategy to read the Local Plan along with the Neighbourhood Plan.</p> <p>The Urban Design Study is underpinned by a townscape character assessment of the entire Borough, and it is intended it sits alongside other detailed guidance. Many policies refer to local character as identified in the Urban Design Study and Conservation Area Appraisals/Statements, and the guidance around Conservation Areas is explained in the supporting text to Policy 29.</p>

		<p>We note reference to The Urban Design Study with design guidance for each character area. The Urban Design Study includes listed buildings and conservations areas. What is the status of the Urban Design Study and its relationship to existing conservation area appraisals. Urban Design Study link Executive Summary here Urban Design Study shows capacity for development with Ham Close as high and E1 (Ham and Petersham Residential character area) as medium-medium/low. There are also spots of med-high capacity at Cassell Hospital, the Convent and Latchmere Close. We support the 'vision' which cites and builds on the Neighbourhood Plan vision. P.93 We note reference to Neighbourhood Plan policies and 'community proposals'.</p> <p>[See comment 578 on site allocation for Ham Close and comment 581 on site allocation for Cassel Hospital]</p>	
170	Philip Briggs, Richmond Bat Species Action Plan Steering Group	<p>Biodiversity isn't specifically mentioned in all of these. They all have aims to protect and expand green networks but the specifics mostly relate to the benefit for people. Please could we have protecting and increasing biodiversity and wildlife corridors included as a key part of wording about green networks in each place-based strategy? It is excellent to see explicit requirements to protect and enhance adjacent river wildlife corridors in several of the Site Allocations. However, a number of the Site Allocations which would be major developments do not specify anything relating to the Council's commitment to "...encourage the creation of multi-functional green space wildlife or ecological corridors within new development site layouts..." (from section 21.7). More specific comments are provided in Part C below.</p>	The place-based strategies have been informed by the Ham & Petersham Neighbourhood Plan, Twickenham Area Action Plan and the Village Plan SPDs, updating as necessary, and drawing on details of the Urban Design Study prepared to inform this Local Plan. The Site Allocations are an opportunity for the Council to set out its aspirations for what that development should and could achieve, based on the context of the site and policies within the Local Plan. The Plan should be read as a whole, and therefore the policy requirements to address such issues across the borough and all relevant site proposals are set out in the thematic policies.
171	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	Our response here on the Place-based Strategy: Richmond Town and Richmond Hill and Policy 28 – Local character and design quality (Strategic Policy) explains where we disagree.	Noted.
172	Eileen Folan	Concerned that the focus seems to be on buildings and office space, rather than resident needs - eg GP surgery, access to police ,	Noted, although the Plan is focused on land uses and new development. Service provision itself would be a matter for the relevant provider such as a health body or the Met Police Service. The section on Delivery & Monitoring has been expanded to address implementation of the Plan, and the updated Infrastructure Delivery Plan looks at the future needs of providers. There is emphasis in the Plan on working with service providers to provide space including where practicable in multi-use, flexible and adaptable buildings.
173	Paul Luton, Cycling UK	Look again at report commissioned to reduce car dominance in Hampton - Hampton Hill. This seems to have been filed away as too brave.	The emphasis in the Plan is contributing to a modal shift away from the car, to minimise residents' trips made by car, recognising the borough has high levels of car ownership. The 20-minute neighbourhood concept is intended to encourage the development of vibrant communities that enable residents to complete everyday tasks such as shopping and accessing essential services by foot, bike, or public transport.
174	Faye Wright, Forward Planning and Development on behalf of BMO Real Estate	<p>In relation to Richmond and Richmond Hill the draft policy states:- "Future Development in this place is expected to: - encourage the provision of office floorspace and new flexible workspaces within the town centre and intensification of existing employment sites to provide for jobs and support local businesses". We are of the view that this needs to recognise that only viable employment sites will be intensified and that in order to secure vibrancy and flexibility, outdated/unviable office accommodation could be converted to other more viable uses.</p>	See response to comment 20. This encouragement of employment floorspace for the place-based strategy for Richmond (and the same for Twickenham) is considered appropriate given they are the most accessible locations in the borough, including the town centres where the London Plan Town Centre Network office guidelines envisage office potential.
175	Jim Brockbank	Overall I strongly agree with the innovative concept of the place based strategies outlined.	Support noted.
176	James Armstrong, Richmond Cycling Campaign	<p>RCC is overall supportive of the place based strategies, and particularly welcomes the policies included that aim to reduce car dominance, encourage mixed use development, improve routes for walking and cycling, encourage pedestrian permeability, high street pedestrianisation, and interchanging with/promoting bus and train use. However we notice that these measures (excluding the mixed use of land) are not consistently included in all the place based strategies, something that will be necessary if the plan is to deliver on the proposed Strategic Vision, the borough's transport modal share targets, and the implementation of the 20 Minute Neighbourhood concept through the Local Plan. Similarly, we notice that within the context sections of the site proposals, cycling, walking and public transport are often not mentioned (or only public transport is). This is particularly concerning when considering the larger and more dense sites proposed to be allocated, as these promise the largest possibility to change and embed more positive transport habits.</p>	The place-based strategies have been informed by the Ham & Petersham Neighbourhood Plan, Twickenham Area Action Plan and the Village Plan SPDs, updating as necessary, and drawing on details of the Urban Design Study prepared to inform this Local Plan. The Site Allocations are an opportunity for the Council to set out its aspirations for what that development should and could achieve, based on the context of the site and policies within the Local Plan. The Plan should be read as a whole, and therefore the policy requirements to address such issues across the borough and all relevant site proposals are set out in the thematic policies.
177	Matthew Bolton	<p>Under place based strategy 6: Hampton, Hanworth Homebase should be added as a potential mixed use residential/ commercial intensification site allocation. This is a retail park site with a large proportion of the site as surface level car parking. As seen elsewhere in the borough (Richmond Homebase) and in neighbouring boroughs (Kingston Homebase and Syon Lane Homebase) there is a clear desire by the landowner of these sites to convert their use to residential. The Local Plan makes no reference to the potential redevelopment of Hanworth Homebase for a residential scheme with affordable housing. Also the Molesey Telephone Exchnage in Hampton is not allocated as a site. Elsewhere across the borough, the place-based strategies often contain telephone exchanges that may be disposed. This site should also be included.</p>	Homebase on the Twickenham Road, Hanworth and Hampton Telephone Exchange have been added as Site Allocations.
178	Andrew Whitehead	<p>I strongly disagree with content in section 6, "Place-based Strategy for Hampton & Hampton Hill" and specifically its sub-section "Allocation 1: Hampton Square, Hampton". The "Site Proposal" contains an implicit intention to develop the only part of the Hampton Square Allocation that is designated as an Other Open Land of Townscape Importance (OOLTI), and which contains a much-used children's playground. [See comment 289 in relation to Site Allocation 1]</p>	It is considered appropriate to remove this area of OOLTI/Public Open Space from the Site Allocation. See also response to comment 289.
179	Mark Lawson	I am commenting specifically on Section 7 of the plan.	Support noted.

		I am specifically on the Teddington Police station site. If you want to build affordable housing next to the Stoop, that is fine as I do not frequent that rugby club or the larger stadium across the road, where I find the tickets too expensive.	
180	Graeme Fraser-Watson, The Teddington Society (Planning Group)	See Question 10 [comments added under Section 7 Place-based Strategy for Teddington & Hampton Wick in Table 6]	See response to comment 300 in relation to the place-based strategy for Teddington & Hampton Wick.
181	Sue Clayton Smith	Twickenham Town Centre and Twickenham Green have a high sensitivity to change and require as much naturalising as possible because of the high density of development in the surrounding streets. Access to green space is vitally important for the health and wellbeing of local residents.	Noted.
182	N Maureen John	The 20 minute neighbourhood plan is an interesting concept	Noted.
183	Alexandra Bamford, Boyer Planning on behalf of Twickenham Film Studios	Agree with '8 Place based strategy for Twickenham, Strawberry Hill & St Margarets' and specific reference to the Studios. We consider that 'Arlington Works' should be designated as a 'Locally Significant Industrial Site'.	Noted. See response to comment 839.
184	Christine Duke	Agree that place based strategies could give the benefit of experience and experience of community in recognised areas however could also lead to division across the Borough where each recognised area seeks to protect its own interests rather than view the overall quality of life experience of the Borough as a whole. - Do not agree with overdevelopment of town centres of Richmond, Twickenham, Teddington, Whitton and East Sheen.	It is not the intention to carve up places for them to protect their own interests. See response to comment 644 on the methodology for defining the boundaries of the character areas set out in the Urban Design Study. Character area boundaries are, in reality, zones of transition and are rarely hard lines on the ground. Any proposal that comes forward would still need to take into consideration the local area and impacts. See response to comment 132 in relation to development in town centres.
185	Hannah Blunstone, CBRE on behalf of Rugby Football Union (RFU)	The Twickenham Stadium is within the Twickenham, Strawberry Hill & St Margarets area, specifically, Twickenham Residential. The supporting text acknowledges that the area includes Twickenham's nationally important rugby venues at Twickenham Stadium, a world famous landmark and the home of Rugby Union. The Urban Design Study (2021) notes that Twickenham Residential has high sensitivity to change. The overall strategy states that for Twickenham Residential (C2) the strategy is to conserve, enhance and improve the character of this area by enhancing its legibility and the consistency of its built environment. We consider inclusion of the Stadium within the Twickenham Residential sub-area conflicts with the following statement within the 'vision' section of the place-based strategy: 'Twickenham's important sporting and cultural attractions will be maximised'. We consider that to properly enhance the role sporting role of Twickenham Stadium (Site Allocation 13), the Stadium and its immediate surrounds should form part of its own character area; or, specific exceptions should be referenced in Place Based Strategy 8. This is further considered within the detailed response letter. [See comment 522 in respect of Site Allocation 13. Twickenham Stadium]	The character profile for C2 Twickenham Residential notes that the stadium forms a "distinct sub area". Under Sensitivity, the Twickenham Stadium is identified as sub area b, with a lower sensitivity and described as one of the two "discrete areas standing in contrast to the mostly low-lying residential setting. In these areas there may be areas more able to accommodate change..." The following wording added to the design guidance in the Urban Design Study: <i>Create a masterplan/vision for the area around Twickenham Stadium (sub area b) to encourage better integration of the stadium alongside opportunity for additional sporting and cultural attractions.</i>
186	Mary Egan	I would suggest that Twickenham town centre and the Green have a high sensitivity to change and require as much naturalising as possible because of the tightly packed roads with terraced houses. Access to Green spaces is of paramount importance to the citizen's mental health.	For Twickenham, Strawberry Hill and St Margarets Area the overall sensitivity to change in the Urban Design Study has been amended from medium to high, as there are more areas of higher sensitivity than lower sensitivity as shown on the map.
187	Chris Toop	I strongly object to the fact that the proposals for key sites such as the Homebase site, The Sainsburys site and Kew Retail Park appear to replicate the aspirations of developers for those sites thereby facilitating approval of their proposals.	The Site Allocations are intended to identify sites across the Borough where development is likely or feasible to come forward, and are an opportunity for the Council to set out its aspirations for what that development should and could achieve, based on the context of the site and policies within the Local Plan. Where there is an extant planning permission, or a live application where the applicant has extensively engaged with planning officers as part of the Council's pre-application service, it is reasonable that the Site Allocation aspirations might align with the development proposal. However, this would not be at the expense of what the Council believes to be appropriate and desirable for the site in general. Indeed, the Council has received a number of comments from potential developers, as part of the Regulation 18 consultation, with suggested amendments to the Site Allocations. In a number of cases, officers have not agreed with the suggested changes, as can be seen in the Council's Schedule of Comments. Ultimately, all applications would need to comply with policies within the Local Plan as a whole, and the Site Allocation aspirations are designed to align with these. Further, the Site Allocations are not prescriptive with regards to specific density or minimum/maximum housing numbers, thus they do or do not reflect developer aspirations where these are already known.
188	David Abel	I vehemently disagree with the decision taken to subdivide the borough into discreet sections as though impact on one area has no impact on another. A holistic approach across the whole of the space should be taken not piecemeal carving up. For example East Sheen has within it the Mortlake Riverside development and Barnes hospital but it would appear that Manor Road and Kew retail will have no impact at all as they exist in two separate pocket universes.	It is not the intention to carve up places. See response to comment 644 on the methodology for defining the boundaries of the character areas set out in the Urban Design Study. Character area boundaries are, in reality, zones of transition and are rarely hard lines on the ground. Any proposal that comes forward would still need to take into consideration the local area and impacts.
189	Clare Snowdon	It's good to see requirements such as habitat corridors included here	Support noted.
190	Philip Villars, WSP on behalf of Sharpe Refinery Service Limited	Place-Based Strategy for Twickenham, Strawberry Hill and 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. In order to be robust it should differentiate. As an aside, the policy attached to this section does not have a number or title. We therefore assume that the policy is to be known as Policy 8 - Place-Based Strategy for Twickenham, Strawberry Hill and St Margarets. Broadly we support the overall vision for St Margarets which is to maintain an attractive residential character to the area. Having said this, we are of the view that St Margarets Local Centre and its immediate surroundings are mixed use in nature and have the potential to further develop a mixed use nature. This should be recognised within the policy for the area, as the mixed use nature is an important component of the local economy which should be identified and supported. We do not understand or agree with the rationale used to select or discount sites for inclusion within site allocations within the area. Our client's site, Arlington Works 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	The local centre has not been defined as a separate character area in the Urban Design Study due to its scale, however, its distinct character is brought out in the text of the character area profile for C6. Mixed use character is brought out in the strategy text "improve local centre function, encouraging more mixed uses..."

		Works can play in regeneration. The immediate neighbourhood to the Arlington Works site is primarily residential in nature, and going forwards, planned development on the site needs to be mindful of this.	
191	Alice Shackleton, on behalf of The Kew Society	<p>- We would like to see a more concrete strategy for how the Council intends to insure that "Kew World Heritage Site will be protected and enhanced to conserve its outstanding universal value", particularly in light of the blocks under construction, applied for and envisaged in East Hounslow which would undoubtedly impact negatively on the OUV. Could "what you want" mean current important matters (such as shortage of affordable housing) might be used to override designation of protected open lands? These lands should, in our view, be held by the present owners as trustees for future generations. Once gone for current short-term needs and perceived needs, they are gone forever.</p> <p>- Notwithstanding the Urban Design Study 2021 proposals, we would like to see protection against inappropriate height (ie 7 storeys or more) and density of a potential redevelopment of Kew Retail Park, given current maximum heights in the adjacent Kew Riverside development are - with one exception - five storeys or less. Reactions to and changing work patterns as a result of the pandemic bring into question people's wish to live and increasingly work from home in such buildings.</p>	<p>-The design guidance for G1 Kew Gardens and Riverside contains a link to the WHS management plan which contains the detail about how to protect and enhance the site.</p> <p>- The Urban Design Study has identified there is capacity for the site to accommodate buildings up to 7 storeys 'within part of the tall building zone in the centre of the site' (p.257). The UDS has assessed the tall building zone with reference to a scenario, as set out in Appendix A (p.335-337). The assessment concludes that 'the depth of the Kew Retail Park site offers potential for buildings up to 7 storeys within part of the tall building zone in the centre of the site. The existing character and size of the Kew Retail Park site provides opportunity for a development that could positively enhance the character of the area'. (p.337).</p> <p>As illustrated on p.336 of the UDS, the assessment in Appendix A includes a ZTV of a 7 storey building in the centre of the site, and shows that visibility of this is unlikely to extend to Kew WHS.</p> <p>- Added wording to the tall building zone in the UDS: "Views from Kew World Heritage Site,...will need to be assessed as part of any tall building proposal."</p>
192	Jon Burrell	The plan should not support the use of Twickenham Stadium to facilitate arms dealing as has happened in Jan 2022 with the International Armoured Vehicles Conference.	This is a matter outside the scope of the Local Plan; events and conferences are the decision of the owner/operator.
193	Hilary Pereira, River Thames Society	Most of these strategies have much that is sensible and appropriate in relation to the River Thames. However, the River Thames Society has commented adversely during the planning process on the detail of proposals in some areas, like Twickenham Riverside, and will continue to do so.	Noted.
194	Bridget Fox, on behalf of the Woodland Trust	n/a	Noted.
195	Joanna Childs	Although LBRUT is made up of lots of villages they don't exist in isolation and any future plans need to look at the borough as a whole. Or am I banned from Richmond town centre because it takes me more than 20 mins to walk there?	The 20-minute neighbourhood concept is intended to encourage the development of vibrant communities that enable residents to complete everyday tasks such as shopping and accessing essential services by foot, bike, or public transport. This is achieved by ensuring residents are within 20 minutes' walk from a town centre, local centre, neighbourhood centre, or local shopping parade in line with Policies 17 and 18, or other smaller concentrations of local shops and services in line with Policy 20.
196	Max Millington	<p>Speaking only in relation to Site Allocation 34 (Stag Brewery), I strongly disagree with the move from a local primary school to a large secondary school, and sixth form serving a large number of out-of-Borough pupils, that will have a materially negative impact on the local area, particularly when taken in context of other proposed land uses: the cumulative impact will not contribute to the new village heart for Mortlake, will not protect green open space, will not protect residents' lungs and will not reduce the risk presented by the level crossing. Mortlake is severely constrained and cannot house a secondary school of the size proposed. 6FE plus sixth form is not sustainable on this site.</p> <p>Further, there is no requirement for such a school that cannot be met by expansion of other schools.</p> <p>And, even if there were a requirement, this is not the optimal site - Barn Elms represents a better site overall when assessed alongside all potential sites across all relevant criteria - an exercise with LBRuT have not undertaken. There should be due local consultation on this - noting that only 9% of respondents to the LBRuT planning applications supported Application B (secondary school) - there is vehement local opposition, for good reason.</p> <p>In any event, local parents do not wish to see a school of the type proposed by Livingstone Academy (the proposed provider, without local consultation). Section 14A of the Education Act 1996 (parent choice) has been entirely disregarded.</p> <p>Further, the impact of the proposed development - and other local schemes such as Homebase - on primary school provision has not been properly assessed and should be prioritised, including the opportunity to move Thomson House school from its sub-optimal dual site position at present away from the level crossing onto a single site with its own enclosed recreation space.</p> <p>Otherwise, the objectives of the allocation are reasonable, but the application of those principles to recent planning applications falls short and cannot be disregarded in formulating the new Local Plan. For instance, the Local Plan references respecting the 2011 planning brief, but that has not been the case. The Local Plan references protecting natural green space, but that has not been the case (for instance, 2 natural grass playing fields will be replaced by concrete and a single plastic pitch. Please refer to detailed comments. [See comment 646 in relation to the place-based strategy for Mortlake and see comment 655 in relation to Site Allocation 34]</p>	<p>Noted.</p> <p>See responses to comments 646 and 655.</p>
197	Tom Dunbar	I suggest that Twickenham Green currently has very poor access in the surrounding housing areas - with many schools and few amenities. I believe that green space and green infrastructure should be supported before plans to build are in place. The infrastructure isn't there and green spaces are highly sensitive to change.	<p>Noted. Twickenham Green is being upgraded from a Local Shopping Parade to a Neighbourhood Centre. Please see Policies 17 and 18.</p> <p>The Council places great importance on the borough's green spaces and other open spaces, and the Plan contains clear and consistent policies intended to protect, enhance, and provide additional open space.</p>
198	Peter Willan and Paul Velluet, Old Deer Park Working Group	Our response here on the Place-based Strategy: Kew and on Policy 28 – Local character and design quality (Strategic Policy) explains where we disagree. [See comment 620 on the place-based strategy for Kew]	Noted.
-		Note comments on place-based strategies and/or site-specific allocations (including for example in relation to Site Allocation 9: Teddington Police Station) have generally been collated in Table 6 below to group with other similar comments.	

Table 6: All responses received (to questions 9/10/11 on the [response form](#)) in relation to general comments on the Local Plan (detailed policies etc) (as received, in Plan order) and the Council's response

Rep No.	Full Name	Part of plan commenting on	Detailed Comments	Council's response
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199	Theresa Oddelm, The Royal Parks	General comments (in relation to Royal Parks)	<p>The Royal Parks is grateful for the opportunity to comment on the above proposals at this stage in the process.</p> <p>Planning Overview</p> <p>The Royal Parks acknowledges the inclusion of reference to the importance of Richmond Park and Bushy Park within the London Borough of Richmond upon Thames as set out within the Pre-Publication Draft Local Plan.</p> <p>We note that the Royal Parks are highlighted within the document text in respect of: area context, place-based strategies, promoting jobs and local economy, views and vistas, green and blue infrastructure network, public open space, and biodiversity designations. The importance of the Parks in the context of these topic areas aligns with The Royal Parks' own objectives.</p> <p>In addition to references in the supporting text, the Pre-Publication Draft Local Plan makes specific reference to The Royal Parks within a number of policies. Whilst this is acknowledged, we would like the London Borough of Richmond upon Thames to go further by including a stand-alone Royal Parks policy. We consider that the importance of the Parks - as demonstrated by relevant reference to them throughout the Draft Local Plan - would justify such an inclusion and The Royal Parks would be keen to work with the Council to achieve this.</p> <p>The Royal Parks would also like to work with the Council to capture the value of development around the Parks, and for support in protecting, maintaining and enhancing these sites of key green infrastructure which represent a significant asset to the Borough. Both dense development directly on our Park boundaries and taller developments that impact on the sightline are potentially detrimental to these listed landscapes and intrusive to our visitors. We would therefore like to see the Local Plan tie in with our own developing policy documents.</p> <p>[See other comments in relation to draft policies and comments specific to biodiversity and the Royal Parks' Environmental Designations]</p> <p>Conclusions and Proposals</p> <p>We are pleased to see the quality of the policies put forward which align with many objectives of The Royal Parks. We would however like to work with the Council to achieve more policy support for The Royal Parks, both in terms of its protection from development beyond the Park boundaries, and in terms of The Royal Parks' own activities and objectives to maintain, protect and enhance these important assets and provide for the increasing number of visitors to them.</p> <p>In addition to the policy-by-policy comments provided above, we would like to suggest the following actions in respect of the development of this Local Plan:</p> <p>A stand-alone Royal Parks policy: Bushy and Richmond Parks account for most of the green space in the Borough and deliver significant environmental and amenity benefits for local residents. The Royal Parks are key features and assets in the London Borough of Richmond upon Thames. It would therefore be proportionate for a specific Royal Parks policy to be included within the Local Plan. This could be similar to draft Policy 32 (Royal Botanic Gardens, Kew World Heritage Site). A specific Royal Parks policy in the Local Plan could refer to the Royal Parks Management Plan. It could then be referred to and cross-referenced within other key relevant policies, for example similarly to how draft Policy 45 refers to Policy 32 (note there is a typo which refers to the policy as Policy 29 rather than Policy 32). We believe the objectives of the Council and The Royal Parks are aligned and we are keen to engage with the Council in the drafting a stand-alone policy which would have the benefit of giving the Parks the protection and support which they require over the Plan period.</p> <p>Capturing value of development to support The Royal Parks:</p> <p>The Royal Parks are a key part of green and open space infrastructure in the Borough, in terms of both the quality they provide and the sheer scale of space they provide. Development in the Borough, particularly new residential development, benefits significantly from what the Royal Parks provide but also significantly increases the pressure upon them, through increase and intensification of visitor numbers. The Royal Parks would therefore like to work with the Council to capture the value of relevant development to support The Royal Parks in our work to protect, maintain and enhance the Parks, potentially through S106/CIL contributions over the next Plan period.</p> <p>As we review and refresh existing policies and develop new initiatives in respect of development within the Parks, we will engage with the Council and other key stakeholders at appropriate times and take into account the new Local Plan for the Borough.</p>	<p>The importance of the Royal Parks is recognised in the Plan, along with the recreational pressures faced. There are a number of policies that would apply to their protection. They are referenced in the relevant place-based strategies, by a number of policies in terms of those protecting MOL, biodiversity and nature conservation, views and vistas (Policies 34, 35, 39, 31), and that allow the impacts of development to be assessed (including Policies 53, 37, and 49).</p> <p>These are considered to adequately address the Royal Parks across the Plan as a whole, and a stand-alone Royal Parks policy is not considered necessary.</p> <p>Assessing impacts of major applications on certain types of existing infrastructure, including public open space is set out in Policy 37 and social infrastructure in Policy 49. Planning obligations are a mechanism to make a development acceptable in planning terms that would not otherwise be acceptable, as set out in the Implementation, Delivery and Monitoring section of the Plan, however they must meet the tests set out in the regulations, and so also must be directly related to the development, and fairly and reasonably related in scale and kind to the development. Alongside planning obligations, the Community Infrastructure Levy (CIL) is collected (on CIL-liable floorspace) and can be spent on a wide range of potential infrastructure to support development in the borough.</p>
200	Katie Parsons, Historic England	General comments (in relation to historic environment)	<p>As the Government's adviser on the historic environment Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the planning process. Therefore, we welcome the opportunity to comment on the draft document.</p> <p>We have provided some more detailed comments in appendix 1 below [see comments in this schedule], but in summary the plan represents the historic environment well and considers it consistently and appropriately throughout. Our main concerns relate to the detail associated with site allocations. There are some areas however where the plan can be improved to ensure the historic environment is conserved and managed sustainably.</p> <ul style="list-style-type: none"> • We note that the plan allocations do not assign densities, quantum of development etc. This may be due to the early stage of the plan, but it would be helpful to have clarification on this point. It is important that sites with heritage sensitivities are carefully considered to ensure the extent of development anticipated can be accommodated sustainably. We have focused our comments on key sites being put forward for allocation. • In general, the findings from the Urban Design Study (2021) could be better transposed into policy objectives, particularly within the site allocation policies. It is appreciated that further design work will be carried out e.g. masterplans, SPDs etc. for some of the sites, but where specific findings have already been drawn in the evidence there is scope to reflect key points within the plan policies at this stage. The future development of guidance leaves a gap between adoption of the plan and its production, the risks posed by this would be minimised by providing further detail and development requirements within the policies. This is an important part of demonstrating a positive strategy for the conservation of the historic environment as set out in the NPPF. 	<p>Noted, and welcome comment that the Plan represents the historic environment well.</p> <p>The Site Allocations are intended to identify sites across the Borough where development is likely or feasible to come forward, and are an opportunity for the Council to set out its aspirations for what that development should and could achieve, based on the context of the site and policies within the Local Plan. See also response to comment 284.</p> <p>The Site Allocations in the Local Plan are not prescriptive with regards to specific density or minimum/maximum housing numbers. The detailed completions and five year housing supply are set out by ward in the annual Housing AMR, including Site Allocations where relevant in any particular year.</p> <p>The boroughwide Urban Design Study has informed the place-based strategies, Site Allocations and policies, and it is considered an appropriate level of detail is set out in the Plan. A number of the Site Allocations reference where a masterplan</p>

			<p>Finally, we should like to stress that this opinion is based on the information provided by the Council in its consultation. To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposals, which may subsequently arise where we consider that these would have an adverse effect upon the historic environment.</p> <p>Detailed comments The plan provides a strong basis for the conservation and enhancement of the historic environment. We welcome the attention paid to climate change, the focus on a design-led approach to site capacity, as well as standalone policies on non-designated assets, views, shopfronts, and regular reference to the Urban Design Study. Generally, please take the absence of comments on policies as them being acceptable. We have some comments on the following aspects of the plan however. [see comments in this schedule]</p>	<p>or site development brief could be developed in the future, although this may be linked to these sites being brought forward.</p>
201	Tim Catchpole, Mortlake with East Sheen Society	General comments (in relation to structure of plan)	<p>We note that this draft update of the Local Plan (referred to hereafter as the Update Plan) launches almost immediately into the spatial strategy for the nine distinct areas of the Borough and then covers the Borough-wide policies, whereas the current Local Plan adopted in 2018 sets out the Borough-wide policies first leading to the spatial strategy at the end. We wonder why there has been this change of approach?</p> <p>The ‘batting order’ of the Borough-wide policies rightly starts with policies on climate change, energy, flood-risk and water infrastructure and then follows with housing, town centres, local character and design quality, green and blue infrastructure, sustainable travel and the social and community infrastructure. This is a sensible batting order but we fail to understand why the document then concludes with the design process, tall buildings, local environmental impacts and basements – they seem to have been tagged on at the last minute like after-thoughts whereas they should surely belong to the section on local character and design quality, as indeed they do in the current Local Plan.</p> <p>The plans in the spatial strategy sections need to be clearer and the ‘ratings polygon diagrams’ from the Urban Design Study consultation of 2021 are poorly presented in an almost illegible series of images. The data would be better presented as tables as the polygons are virtually meaningless to most people who are not academic specialists.</p> <p>In our comments we have found the text in your supporting document – A Summary of the place-based strategies with site allocations and policies (Dec 2021) – very useful as “it sets out some of the main changes when compared with the adopted Local Plan.”.</p>	<p>The adopted and draft Plans have different structures. However, the spatial strategy (section 3.1) did follow the vision and objectives in a similar way. There were no place-based strategies in the adopted Plan.</p> <p>It is considered that it is logical for the overarching Living Locally and Spatial Strategy policies to be followed by the place-based strategies interspersed with the relevant site allocations. The themes have then been ordered to start with climate change and affordable housing.</p> <p>In any plan order there will always be policies that have to be at the end; it is more important that the structure flows and it is easy for a user to navigate around the document.</p> <p>The spider charts on what people valued in their area, taken from the Urban Design Study, have now been removed as the text is considered sufficient.</p> <p>Noted the summary has been useful, and this has been updated to accompany the Regulation 19 Plan.</p>
202	Hannah Bridges, Spelthorne Borough Council	General comments (in relation to Site Allocations and Spelthorne Local Plan)	<p><u>Allocations</u> We note there are no sites proposed in the Site Allocations document in close proximity to the boundary of the two authorities.</p> <p><u>Spelthorne Local Plan</u> Spelthorne BC plans to consult on its Draft Local Plan (Regulation 19) in late Spring 2022 therefore we welcome further engagement on this and strategic matters moving forward.</p> <p>Spelthorne Borough Council looks forward to continuing its engagement with LB Richmond upon Thames through the Local Plan process. Officers in the Strategic Planning team are available to discuss any of the comments above should this be useful.</p> <p>Please note that this response is at officer level and as such, Spelthorne Borough Council reserves the right to raise any further issues during the preparation of the LB Richmond Local Plan if Members of the Council wish to do so.</p> <p>[See comment 742 on housing].</p>	<p>Noted.</p>
203	Shahina Inayathusein, TfL Location Enquiries	General comments (in relation to London Underground Infrastructure Protection)	<p>We have no comments to make at this stage except that London Underground Infrastructure Protection needs to be consulted as Statutory Consultees on any planning application within London Underground zone of interest as per TOWN AND COUNTRY PLANNING, ENGLAND-The Town and Country Planning (Development Management Procedure) (England) Order 2015 issued on 16th April 2015.</p> <p>Also, where there are intended works in the Highway we would need to be notified of these so that we can ensure there is no damage to them.</p> <p><i>This response is made as Railway Infrastructure Manager under the “Town and Country Planning (Development Management Procedure) Order 2015”. It therefore relates only to railway engineering and safety matters. Other parts of TfL may have other comments in line with their own statutory responsibilities.</i></p>	<p>Noted.</p>
204	George Goodby, Environment Agency	General comments (in relation to EA position and Duty to Cooperate)	<p>Environment Agency Position Our aim is to assist you prepare and implement a sound, robust, and effective plan that is reflective of national policy and your local evidence base. We hope that this collaborative process leads to a plan that delivers sustainable development, contributes to a stronger economy, and safeguards the environment for future generations.</p> <p>Our detailed comments are provided below, following the general order of the topics presented in the draft local plan document. Where we wish to see policies strengthened we have outlined the additional content we would like included. We have also referenced the relevant sections and policy numbers for ease of navigating our response.</p> <p>We support your strategic objectives to ensure London Borough of Richmond has a sustainable future:</p> <ul style="list-style-type: none"> • Responding to the climate emergency and taking action • Increasing biodiversity and the quality of our green and blue spaces, and greening the borough • Reducing the need to travel and improving the choices for more sustainable travel <p>We have provided detailed comments in Section 1 on the key environmental issues and opportunities within the Local Plan. Section 2 contains our comments on the individual proposed site allocations for development. Within Section 3 we have provided comments on our review of the Sustainability Appraisal and Sequential Test report. [See other comments in this schedule]</p> <p>Duty to Co-operate</p>	<p>Noted.</p>

			<p>Most natural resources extend across multiple Local Authority areas. We encourage the Council to make full use of the Duty to Co-operate when revising this draft local plan. Cross-boundary, collaborative working will ensure that strategic priorities across local boundaries are properly co-ordinated. Please consider this when addressing climate change, flood risk, waste management, habitat and biodiversity enhancement, watercourse protection and improvement, water and waste resources.</p> <p>Final comments Once again, thank you for contacting us, we hope that our comments are useful. We would welcome the opportunity to work with you to address our concerns so that prior to the Regulation 19 consultation, you may produce a robust, effective and justified plan that is reflective of national planning policy and your local evidence base.</p>	
205	Nina Miles, GLA on behalf of Mayor of London	General comments	<p>As you are aware, all Development Plan Documents in London must be in general conformity with the London Plan under section 24 (1)(b) of the Planning and Compulsory Purchase Act 2004. The Mayor has afforded me delegated authority to make detailed comments which are set out below. Transport for London (TfL) has provided comments, which I endorse, and are attached at Annex 1. [See comments under Richard Carr, Transport for London (TfL) in this schedule]</p> <p>The London Plan This letter provides advice and sets out issues or approaches you should consider as the new London Borough of Richmond upon Thames Local Plan develops so that the final draft Local Plan is consistent with the London Plan 2021 (LP2021). The London Plan 2021 was formally published on the 2 March 2021, and now forms part of LB Richmond upon Thames' Development Plan.</p> <p>General The Mayor recognises that Richmond's Local Plan consultation is now at the pre-publication stage of the borough's Local Plan preparation and that it has been informed by a Direction of Travel public consultation which was undertaken in Spring 2020. It sets out the strategic vision, objectives and spatial strategy, with place-based strategies and thematic policies and guidance to manage growth and guide development across the borough. This letter provides an opportunity also to draw your attention to the Mayor's pandemic recovery missions. There are nine missions in total, including high streets for all, enabling resilient communities and digital access for all, which may be useful in helping to develop the spatial strategy for Richmond further. The Regulation 18 Local Plan sets a clear plan for growth and addresses many important policy areas such as responding to climate change and delivering new homes through incremental intensification in well-connected locations. However, the current approach to affordable housing in Policy 11 is likely to be an issue of general conformity and further detail on this is provided below.</p>	Noted.
206	Natural England	General comments	<p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development. Natural England have no comments to make on this consultation. [See comment 221 following Duty to Cooperate email]</p>	Noted.
207	K Peachey	Whole plan	<p>I congratulate you on what looks like a very progressive plan at first glance. I would have liked more time to read and comment before the deadline but must focus on a couple of areas for the time I have.</p>	Noted.
208	Wendy Micklewright	General comment	<p>Hope you are good + thank you for all you do Mental illness is a lie - which causes untold suffering + distress Please see our website + UTUBE detailed below ... Please include this in your work Emotional CPR: Heart-Centered Peer Support Website – Emotional CPR I do not attend online meetings generally - in solidarity - with many people I know who are digitally excluded for many reasons ... I am not a big fan of surveys - ask certain questions get certain answers When are people going to listen to us - not paid researchers ? The problem is poverty - not individuals being "gaslighted" into thinking they are mentally ill .. I think it is important to stress hearing voices is not an illness ... I understand the conflict between working in the system + challenging the system - it is however important to stress if people do not want the drugs they should be supported to come off the drugs ... This information maybe useful to you ? Sedated, How Modern Capitalism Created our Mental Health Crisis - James Davies + Combating Structural Racism and Classism in Psychiatry: An Interview with Helena Hansen How Western Psychology Can Rip Indigenous Families Apart: An Interview with Elisa Lacerda-Vandenborn Suman Fernando's book Institutional racism in psychiatry + clinical psychology Whiteness as a chemical restraint in statutory guidance of the Mental Health units (Use of Force) Act 2018 – a tribute to Seni's law + Aijibola Lewis Blog by Colin King via NSUN A straight-talking introduction to Psychiatric drugs – the truth about how they work + how to come off them – Joanna Moncrieff People deprived of liberty due to misapplication of Mental Health + Capacity Acts Half of people with a learning disability and autistic people reluctant to provide feedback on care Women disproportionately affected by soaring Mental Health Act detentions Report Finds Monitoring of Electroshock Treatment Unsafe New Study Finds ECT Ineffective for Reducing Suicide Risk</p>	Noted.

			<p>Repeal provisions for Community Treatment Order Provide Tapering Strips for People Who Want to Withdraw Safely from Psychotropic Drugs Petition by James Moore Tapering strips Long-term antipsychotic use linked to breast cancer NICE revises antidepressant guidance to warn of 'severe' withdrawal symptoms Coronavirus and depression in adults, Great Britain: January to March 2021 ONS "Almost 4 in 10 adults earning less than £10,000 a year experienced depressive symptom compared with around 1 in 10 earning £50,000 or more" The data shows what we know to be true: struggling with your mental health doesn't happen in a vacuum. Why not Diagnose Social Conditions Instead of Individual Symptoms? The WHO Calls for Radical Change in Global Mental Health Our work is cited as best practise by the WHO ... FOR INFORMATION To quote Andy Burnham ... If we wait for the "powers that be" we will wait forever? so best if we just do it ourselves?</p> <table border="1" data-bbox="943 646 2071 1144"> <tr> <td>Citizen control</td> <td rowspan="3">Degree of citizen power</td> </tr> <tr> <td>Delegated power</td> </tr> <tr> <td>Partnership</td> </tr> <tr> <td>Placation</td> <td rowspan="3">Degree of tokenism</td> </tr> <tr> <td>Consultation</td> </tr> <tr> <td>Informing</td> </tr> <tr> <td>Therapy</td> <td rowspan="2">Non participation</td> </tr> <tr> <td>manipulation</td> </tr> <tr> <td>Old power</td> <td>New power</td> </tr> <tr> <td>Currency</td> <td>Current</td> </tr> <tr> <td>Held by few</td> <td>Made by many</td> </tr> <tr> <td>Pushed down</td> <td>Pulled in</td> </tr> <tr> <td>Commanded</td> <td>Shared</td> </tr> <tr> <td>Closed</td> <td>Open</td> </tr> <tr> <td>transaction</td> <td>relationships</td> </tr> </table>	Citizen control	Degree of citizen power	Delegated power	Partnership	Placation	Degree of tokenism	Consultation	Informing	Therapy	Non participation	manipulation	Old power	New power	Currency	Current	Held by few	Made by many	Pushed down	Pulled in	Commanded	Shared	Closed	Open	transaction	relationships	
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209	John Waxman, Crane Valley Partnership	General and in relation to river corridors	<p>I am submitting this consultation response in my capacity as the Crane Valley Partnership's Development Manager. The Crane Valley Partnership (CVP) is an unincorporated association of public, private and third sector organisations that aims to:</p> <ul style="list-style-type: none"> • raise awareness and support action for conservation, restoration and new approaches to design and management of the river valley • help communities take a sustainable approach to managing and improving the River Crane and its tributaries • improve and protect the biodiversity of the area • maximise the use of the river corridor as a resource for healthier living and educational activities for local people • promote connectivity along the river corridor <p>CVP is hosted by the Crane Valley Community Interest Company and is the formally recognised Catchment Based Approach (CaBA) partnership for the Crane catchment. CVP is also a member of the GLA's 'Catchment Partnerships in London' Forum. For more information on CVP please see: www.cranevalley.org.uk</p> <p>Please note that LB of Richmond upon Thames is itself a member of CVP. I should also highlight that my response does not present the collective view of the various partner organisations within CVP. Members of CVP will have their own perspectives on the draft Local Plan and will submit their own responses accordingly if they wish to engage in the consultation process.</p> <p>I have read the detailed formal response to this consultation produced by Friends Of the River Crane Environment (FORCE). FORCE is a member of CVP and as you are no doubt aware, this community-based organisation has considerable local knowledge and an impressive track record in terms of environmental stewardship activity. There is nothing in FORCE's response that I disagree with - indeed it provides an excellent commentary and I fully endorse all the comments therein. I would urge the Local Authority to take note of FORCE's response and act on the specific issues raised to assist the process of refining the Local Plan in relation to the protection and enhancement of the Borough's river corridors and associated open spaces. Given FORCE's credentials I would suggest that this organisation's views should carry considerable weight within this consultation.</p> <p>I would like to take this opportunity to reinforce FORCE's comment that the Local Plan should be informed by the <i>Colne and Crane Valleys Green Infrastructure Strategy</i>, produced in 2019, which identifies a range of river corridor enhancement and active travel opportunities in the Borough. This document can be found at: https:// www.colnevalleypark.org.uk/project/green-infrastructure-strategy-colne-and-crane-valleys/ . River Corridors - and indeed the many people who utilise them for travel and</p>	<p>Noted. The protection and enhancement of river corridors and associated open spaces is covered when the Plan is read as a whole. The Council has added a reference to the Colne and Crane Valleys Green Infrastructure Strategy in the supporting text to Policy 34. See also responses to comments 986 and 1052. The updated Infrastructure Delivery Plan also sets out details on green infrastructure, and future projects and opportunities for improvements.</p>																									

			<p>recreation - cross borough boundaries, so a coordinated pan-borough approach to green infrastructure provision is required. LBRuT's Local Plan should clearly acknowledge this.</p> <p>I would highlight that CVP has (through the Smarter Water Catchments initiative) commissioned Sustrans to undertake a footpath and cycleway audit along the river corridors of the Crane Valley. This report will be ready soon and it would be beneficial to feed the findings into the Local Plan consultation process.</p>			
210	Hannah Gray, Avison Young on behalf of National Grid	General in relation to National Grid and energy infrastructure assets	<p>National Grid has appointed Avison Young to review and respond to local planning authority Development Plan Document consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.</p> <p>About National Grid National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. The energy is then distributed to the electricity distribution network operators, so it can reach homes and businesses. National Grid Gas plc (NGG) owns and operates the high-pressure gas transmission system across the UK. In the UK, gas leaves the transmission system and enters the UK's four gas distribution networks where pressure is reduced for public use. National Grid Ventures (NGV) is separate from National Grid's core regulated businesses. NGV develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States.</p> <p>National Grid assets within the Plan area Following a review of the above Development Plan Document, we have identified one or more National Grid assets within the Plan area. Details of National Grid assets are provided below.</p> <p>Electricity Transmission</p> <table border="1"> <thead> <tr> <th>Asset Description</th> </tr> </thead> <tbody> <tr> <td>275Kv Underground Cable route: EALING - LALEHAM 1</td> </tr> </tbody> </table> <p>A plan showing details and locations of National Grid's assets is attached to this letter. Please note that this plan is illustrative only. Please also see attached information outlining further guidance on development close to National Grid assets.</p> <p>Further Advice National Grid is happy to provide advice and guidance to the Council concerning their networks. If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us. To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, National Grid wishes to be involved in the preparation, alteration and review of plans and strategies which may affect their assets. [See Appendix 1 for further guidance and plan]</p>	Asset Description	275Kv Underground Cable route: EALING - LALEHAM 1	<p>Noted. The underground cable, which runs towards the western edge of the borough, has been noted in the update to the Infrastructure Delivery Plan, along with the high-pressure gas pipeline running through part of the east of the borough. The relevant statutory consultees would be informed if any site-specific development is near these assets as part of the development management process.</p>
Asset Description						
275Kv Underground Cable route: EALING - LALEHAM 1						
211	Lucinda Robinson, Marine Management Organisation (MMO)	General in relation to marine planning and marine licensing	<p>MMO Marine Planning and Marine Licensing response to Richmond Local plan Thank you for giving us the opportunity to comment on the local Plan. The comments provided within this letter refer to the document entitled Richmond local plan As the marine planning authority for England, the MMO is responsible for preparing marine plans for English inshore and offshore waters. At its landward extent the Marine Plan boundaries extend up to the level of the mean high water spring tides mark (which includes the tidal extent of any rivers), there will be an overlap with terrestrial plans which generally extend to the mean low water springs mark.</p> <p>Marine plans will inform and guide decision makers on development in marine and coastal areas. Planning documents for areas with a coastal influence may wish to make reference to the MMO's licensing requirements and any relevant marine plans to ensure the necessary considerations are included. In the case of the document stated above, the South East Marine Plan is of relevance. The plan was published for public consultation on 14th January 2020, at which point it became material for consideration. The South East Marine Plan was adopted June 2021, alongside the North East, North West, and South West. The South East Marine Plans cover the area from Landguard Point in Felixstowe to Samphire Hoe near Dover, including the tidal extent of any rivers within this area.</p> <p>All public authorities taking authorisation or enforcement decisions that affect or might affect the UK marine area must do so in accordance with the Marine and Coastal Access Act 2009 and any relevant adopted Marine Plan, in this case the South East Marine Plan, or the UK Marine Policy Statement (MPS) unless relevant considerations indicate otherwise. Local authorities may also wish to refer to our online guidance, Explore Marine Plans and the Planning Advisory Service soundness self-assessment checklist.</p> <p>Marine Licensing The Marine and Coastal Access Act 2009 states that a marine licence is required for certain activities carried out within the UK marine area. The MMO is responsible for marine licensing in English waters and for Northern Ireland offshore waters. The marine licensing team are responsible for consenting and regulating any activity that occurs "below mean high water springs" level that would require a marine licence. These activities can range from mooring private jetties to nuclear power plants and offshore windfarms.</p> <p>Summary notes</p>	<p>Noted. The Council considers that paragraph 21.88 already addresses the points raised. Add further details to paragraph 21.88 to clarify the remit of the Marine Plan and the Marine Management Organisation (MMO).</p>		

		<p>Please see below suggested policies from the South East Inshore Marine Plans that we feel are most relevant to your neighbourhood plan. These suggested policies have been identified based on the activities and content within the document entitled above. They are provided only as a recommendation and we would suggest your own interpretation of the South East Marine Plans is completed:</p> <p>-SE-INF-1: Proposals for appropriate marine infrastructure which facilitates land-based activities, or land-based infrastructure which facilitates marine activities (including the diversification or regeneration of sustainable marine industries), should be supported.</p> <p>-SE-INF-2: (1) Proposals for alternative development at existing safeguarded landing facilities will not be supported. (2) Proposals adjacent and opposite existing safeguarded landing facilities must demonstrate that they avoid significant adverse impacts on existing safeguarded landing facilities. (3) Proposals for alternative development at existing landing facilities (excluding safeguarded sites) should not be supported unless that facility is no longer viable or capable of being made viable for waterborne transport. (4) Proposals adjacent and opposite existing landing facilities (excluding safeguarded sites) that may have significant adverse impacts on the landing facilities should demonstrate that they will, in order of preference: a) avoid b) minimise c) mitigate - adverse impacts so they are no longer significant.</p> <p>-SE-HER-1: Proposals that demonstrate they will conserve and enhance the significance of heritage assets will be supported. Where proposals may cause harm to the significance of heritage assets, proponents must demonstrate that they will, in order of preference: a) avoid b) minimise c) mitigate - any harm to the significance of heritage assets. If it is not possible to mitigate, then public benefits for proceeding with the proposal must outweigh the harm to the significance of heritage assets.</p> <p>-SE-SCP-1: Proposals should ensure they are compatible with their surroundings and should not have a significant adverse impact on the character and visual resource of the seascape and landscape of the area. The location, scale and design of proposals should take account of the character, quality and distinctiveness of the seascape and landscape. Proposals that may have significant adverse impacts on the seascape and landscape of the area should demonstrate that they will, in order of preference: a) avoid b) minimise c) mitigate - adverse impacts so they are no longer significant. If it is not possible to mitigate, the public benefits for proceeding with the proposal must outweigh significant adverse impacts to the seascape and landscape of the area. Proposals within or relatively close to nationally designated areas should have regard to the specific statutory purposes of the designated area. Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks and Areas of Outstanding Natural Beauty.</p> <p>-SE-EMP-1: Proposals that result in a net increase in marine-related employment will be supported, particularly where they meet one or more of the following: 1) are aligned with local skills strategies and support the skills available 2) create a diversity of opportunities 3) create employment in locations identified as the most deprived 4) implement new technologies - in, and adjacent to, the south east marine plan area.</p> <p>-SE-CC-1: Proposals that conserve, restore or enhance habitats that provide flood defence or carbon sequestration will be supported. Proposals that may have significant adverse impacts on habitats that provide a flood defence or carbon sequestration ecosystem service must demonstrate that they will, in order of preference: a) avoid b) minimise c) mitigate - adverse impacts so they are no longer significant d) compensate for significant adverse impacts that cannot be mitigated</p> <p>-SE-CC-2: Proposals in the south east marine plan area should demonstrate for the lifetime of the project that they are resilient to the impacts of climate change and coastal change.</p>	
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			<p>-SE-CC-3: Proposals in the south east marine plan area, and adjacent marine plan areas, that are likely to have significant adverse impacts on coastal change, or on climate change adaptation measures inside and outside of the proposed project areas, should only be supported if they can demonstrate that they will, in order of preference:</p> <ul style="list-style-type: none"> a) avoid b) minimise c) mitigate <p>- adverse impacts so they are no longer significant.</p> <p>-SE-AIR-1: Proposals must assess their direct and indirect impacts upon local air quality and emissions of greenhouse gases. Proposals that are likely to result in increased air pollution or increased emissions of greenhouse gases must demonstrate that they will, in order of preference:</p> <ul style="list-style-type: none"> a) avoid b) minimise c) mitigate <p>- air pollution and/or greenhouse gas emissions in line with current national and local air quality objectives and legal requirements.</p> <p>-SE-ACC-1: Proposals demonstrating appropriate enhanced and inclusive public access to and within the marine area, including the provision of services for tourism and recreation activities, will be supported. Proposals that may have significant adverse impacts on public access should demonstrate that they will, in order of preference:</p> <ul style="list-style-type: none"> a) avoid b) minimise c) mitigate <p>- adverse impacts so they are no longer significant.</p> <p>-SE-TR-1: Proposals that promote or facilitate sustainable tourism and recreation activities, or that create appropriate opportunities to expand or diversify the current use of facilities, should be supported. Proposals that may have significant adverse impacts on tourism and recreation activities must demonstrate that they will, in order of preference:</p> <ul style="list-style-type: none"> a) avoid b) minimise c) mitigate <p>- adverse impacts so they are no longer significant.</p> <p>-SE-BIO-1: Proposals that enhance the distribution of priority habitats and priority species will be supported. Proposals that may have significant adverse impacts on the distribution of priority habitats and priority species must demonstrate that they will, in order of preference:</p> <ul style="list-style-type: none"> a) avoid b) minimise c) mitigate - adverse impacts so they are no longer significant d) compensate for significant adverse impacts that cannot be mitigated. <p>-SE-BIO-2: Proposals that enhance or facilitate native species or habitat adaptation or connectivity, or native species migration, will be supported. Proposals that may cause significant adverse impacts on native species or habitat adaptation or connectivity, or native species migration, must demonstrate that they will, in order of preference:</p> <ul style="list-style-type: none"> a) avoid b) minimise c) mitigate - adverse impacts so they are no longer significant d) compensate for significant adverse impacts that cannot be mitigated <p>-SE-BIO-3: Proposals that conserve, restore or enhance coastal habitats, where important in their own right and/or for ecosystem functioning and provision of ecosystem services, will be supported. Proposals must take account of the space required for coastal habitats, where important in their own right and/or for ecosystem functioning and provision of ecosystem services, and demonstrate that they will, in order of preference:</p> <ul style="list-style-type: none"> a) avoid b) minimise c) mitigate d) compensate for - net habitat loss. <p>[See also comment 993 in relation to paragraph 21.88]</p>	
212	Peter Willan and Paul Velluet, Old Deer Park Working Group	General (in relation to title of the Plan, page numbers)	Local Plan covers the entire Borough so the Title should be Richmond-upon-Thames Local Plan and not simple Richmond Local Plan. Needs remedying.	The shortened reference to the Richmond Local Plan is considered acceptable as it is clear it is a boroughwide plan.

			Despite the page-numbers given in what appears to be the list of contents – but is not headed as such – there is no pagination in the entire document. Needs remedying. The lists of page-numbers in the un-headed list of contents and the headed list of policies should be headed as such. Needs remedying.	The main audience is expected to view the Plan online (either as a pdf where the hyperlinks aid navigation and page numbers appear, or using a web-based html version which has a navigation pane), but it is intended that page numbers will be added to the final version.
213	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	General (in relation to title of the Plan, page numbers)	Local Plan covers the entire Borough so the Title should be Richmond-upon-Thames Local Plan and not simple Richmond Local Plan. Needs remedying. Despite the page-numbers given in what appears to be the list of contents – but is not headed as such – there is no pagination in the entire document. Needs remedying. The lists of page-numbers in the un-headed list of contents and the headed list of policies should be headed as such. Needs remedying.	See response to comment 212.
-		Introduction		
214	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	General comment (in relation to Policies Map)	Neither Section 2 nor Section 15 appears to include any reference to a Policies Map. Referring to the note contained under 'Policies Map for the Local Plan Review, 2015-2018' in the part of the Council's current Planning Policy web-site dealing with the current 'Adopted Local Plan' (adopted in July, 2018), it is clearly stated that 'The Council's Policies Map (formerly called the Proposals Map) will be updated in 2020 to reflect the Local Plan adopted in July, 2018 and March, 2020'. However, to date, this has never been done. There is no published Policies (formerly Proposals) Map beyond that published in July 2015. Prospect of Richmond has picked-up this omission in previous submissions. The omission needs to be urgently remedied.	Paragraph 2.18 referred to the Policies Map, with the document explaining it indicates the proposed changes to the Policies Map. There was a delay to the update of the existing Policies Map to reflect the Local Plan adopted in July 2018 and March 2020; an interactive map which displays the designations and a PDF version (due to its large file size only a low resolution version is available online).
215	Peter Willan and Paul Velluet, Old Deer Park Working Group	General comment (in relation to Policies Map)	Neither Section 2 nor Section 15 appears to include any reference to a Policies Map. Referring to the note contained under 'Policies Map for the Local Plan Review, 2015-2018' in the part of the Council's current Planning Policy web-site dealing with the current 'Adopted Local Plan' (adopted in July, 2018), it is clearly stated that 'The Council's Policies Map (formerly called the Proposals Map) will be updated in 2020 to reflect the Local Plan adopted in July, 2018 and March, 2020'. However, to date, this has never been done. There is no published Policies (formerly Proposals) Map beyond that published in July 2015. Prospect of Richmond has picked-up this omission in previous submissions. The omission needs to be urgently remedied.	See response to comment 214.
216	Alec Lever, Richmond Labour Party	General comment (in relation to the preamble)	Our concern is that its delivery requires interventionist action by the Council which will not happen. Experience has shown, as quoted evidence throughout the document attests, that the ideological reliance, shared by Conservative and Liberal Democrat politicians, on the free market's ability to provide will fail again. We find a complacency in the relative prosperity of the Borough pervades the preamble. All working residents, across all income deciles, are not receiving rewards commensurate to their contribution to national wealth creation. Thriving local businesses need customers with more disposable income. While a fairer sharing of income and wealth requires the 'No more business as usual' change to a Labour Government nationally, Local Government can plan to play its part as the repeated wins of the LGC UK Council of the Year by Labour controlled Councils show, e.g. Hounslow, Barking, Wigan, Brent.	The section on the borough context outlines the strategic context and trends, which notes for example the pockets of deprivation. Add reference to health inequalities and residents on lower incomes. The Local Plan is used to shape developments and guide decisions on where, how much, and what kind of development is needed. The Council itself has limited control over many aspects of this provision and relies on infrastructure providers, service delivery organisations, strategic bodies, developers and landowners, as set out in the new section on Implementation of the Local Plan.
217	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	General comment (in relation to evidence base)	So much in the Draft Local Plan derives from questionable analysis and questionable recommendations in Arup's Urban Design Study and, in more limited part, this in Arup's 156-page Metropolitan Open Land Review Annexe Report. Indeed, all these need to firmly challenged.	Noted. A relevant and up-to-date evidence base underpins the Plan. See also response to comment 594 regarding the methodology underpinning the Urban Design Study. See also response to comment 929 regarding points raised on the MOL review.
218	Peter Willan and Paul Velluet, Old Deer Park Working Group	General comment (in relation to evidence base)	So much in the Draft Local Plan derives from questionable analysis and recommendations in Arup's Urban Design Study and, in more limited part, this in Arup's 156-page Metropolitan Open Land Review Annexe Report. Indeed, all these need to firmly challenged.	See response to comment 217.
219	Katie Parsons, Historic England	Sustainability Appraisal (SA) Scoping	As you will be aware, under the provisions of Article 5(1) of The SEA Directive there is a requirement to assess the likely significant effects which the Policies and proposals of a Plan might have upon "cultural heritage including architectural and archaeological heritage". In terms of the historic environment, whilst we would many aspects of the Appraisal, we have the following comments to make: Plans, Policies, and Programmes: There are a number of other relevant plans and programmes that should be included: <ul style="list-style-type: none"> • UNESCO World Heritage Convention • European Landscape Convention • The European Convention on the Protection of Archaeological Heritage • Convention for the Protection of the Architectural Heritage of Europe • Planning (Listed Buildings & Conservation Areas) Act 1990 • Ancient Monuments & Archaeological Areas Act 1979 • The Royal Botanic Gardens Kew World Heritage Site Management Plan • The local level is also important in setting the appropriate context for the scoping report, which could helpfully draw on Richmond's existing characterisations studies, local lists, Building of Townscape Merit SPD, Conservation Area Appraisals etc. Aspects of the emerging plan have the potential to impact upon the wider historic environment across administrative boundaries. It may be necessary to use local documents from neighbouring boroughs as part of the SA's baseline evidence where relevant. Method for Generation of Alternatives - The historic environment should be a factor when considering a method for the generation of alternative proposals. The impact of proposals on the significance of heritage assets should be taken into consideration at an early stage. In terms of sites, this should be based on more than just measuring the proximity of a potential	These comments were addressed in the revised Sustainability Appraisal Scoping Report (July 2020), which added reference to the Kew World Heritage Site (at paragraph 3.17.1) and included reference to a number of higher level Heritage documents (in the PPP section). Alternative proposals are considered in the SA, to guide decision-making.

			allocation to heritage assets. Impacts on significance are not just based on distance or visual impacts, and assessment requires a careful judgment based on site visits and the available evidence base.	
220	Siriol Davies, Ham and Petersham Neighbourhood Forum	Sustainability Appraisal p.4	1) include reference to construction waste (63% of all landfill) and reducing embodied energy. Reference circular economy. 4) 82% of buildings built today will be here in 2050. need to meet net zero now to avoid need for retro-fit prior to 2050. Include reference to reducing greenhouse gas emissions in retro-fits and refurbishments (not just new developments).	The Sustainability Appraisal objectives have been developed and reviewed over time, and compared to other national, regional and local documents, as set out in the revised Sustainability Appraisal Scoping Report (July 2020). That report also set out detailed baseline information and the draft SA Monitoring Framework. Policy 7 references the circular economy and the Plan has a presumption in favour of refurbishment with high sustainability standards as set out in Policies 4 to 6; although note that retro-fit and refurbishments may not require planning permission.
221	Natural England	Sustainability Appraisal and Habitats Regulation Assessment (in relation to Duty to Cooperate)	Thank you for the detailed update on the progress of the Draft Local Plan including noting our previous responses, and for drawing our attention to the draft Sustainability Appraisal and Habitats Regulation Assessment. Having considered the HRA, we are broadly in agreement with the conclusions. We would support the strengthening of Policy 37 to encourage visitors towards greenspaces outside of those which are Habitat Sites, and recognise the need for further traffic modelling to be able to inform the impacts of the plan in terms of air quality. We would be happy to be reconsulted on the HRA once this modelling has been completed to assess whether we agree with the conclusions, and whether adverse air quality impacts on a Habitat Site can be ruled out or whether there is a need for mitigation.	Further work has been undertaken to assess the trip generation arising from the potential Site Allocations in the Plan, as the draft Habitats Regulation Assessment identified that a potential negative effect on the protected Wimbledon Common Special Area of Conservation (SAC) could not be ruled out without an assessment of the in-combination air pollution effects. This assessment has now been undertaken, using TfL models which confirmed that the changes in traffic on local roads are significantly less than the 1,000 AADT screening criteria. Therefore, in the updated Habitats Regulation Assessment the air quality impacts have now been screened out, with no further / appropriate assessment required.
222	Theresa Oddelm, The Royal Parks	Habitat Regulations Assessment (LUC, 2021)	<u>Screening Assessment, Noise, vibration and light pollution, Richmond Park SAC (page 49)</u> The report states that ' <i>artificial lighting at night (eg. from street lamps, flood lighting and security lights) is most likely to affect bat populations and some nocturnal bird species</i> '. There is therefore no consideration of the potential impact on invertebrates such as stag beetle, which may alter their behaviour (including mating activity) or be more vulnerable to predation as a result of artificial lighting. This potential impact on the Richmond Park SAC should be considered. <u>Screening Assessment, Air Pollution, Richmond Park SAC (page 56)</u> There is no consideration of through traffic within Richmond Park SAC and the potential for associated air pollution to impact stag beetles, either through impacts on trees and particularly veteran trees, or on soil chemistry (stag beetle larvae developing beneath ground). Nor is there consideration of the impact which local developments or transport policies may have on levels of traffic through the Park. <u>Screening Assessment, Recreation, Richmond Park SAC (page 58)</u> Recreation impacts on Richmond Park SAC are discounted solely on the basis of site management. However, as per the discussion for Wimbledon Common (which is screened in for further assessment partly on the basis of its draw to visitors), Richmond Park is subject to extremely high visitor numbers and would likely be impacted by increased development in the Borough to a greater degree given location and accessibility. Visitor pressure is at such a high level that even with extensive resources allocated to tree and deadwood management the tree population - including veteran trees - suffer from compaction and erosion, vandalism and fire (for example), whilst deadwood habitats are subject to significant disturbance by visitors. It is therefore <u>not</u> considered appropriate to screen the site out from further assessment as a result of recreational pressure and for the incorporation of mitigation within the Local Plan.	<u>Noise, vibration and light pollution</u> No Likely Significant Effect is predicted in relation to stag beetle as a result of nonphysical disturbance due to existing high levels of lighting which are already present adjacent and in the surrounding area of Richmond Park SAC and the separation of this European site from proposed site allocations by existing urban development. Increased lighting from proposed development is not considered to result in increased lighting to habitat networks upon which stag beetle are dependent on. The HRA will be updated to reflect that the qualifying feature of the SAC has been considered in relation to this impact. <u>Air Pollution</u> Stag beetles are reliant on deadwood habitat, which is not considered susceptible to impacts from air pollution. This is supported by CIEEM's Advisory Note: Ecological Assessment of Air Quality Impacts (2021), which outlines this as a specific example. The habitats present within 200m of a strategic road were considered of limited value for stag beetle. Due to the low suitability of habitat used by stag beetle within 200m of a strategic road and given that this habitat is not considered susceptible to impacts from air pollution, No Likely Significant Effect is predicted. The HRA will be updated to reflect this. <u>Recreation</u> It is recognised that recreation is an important issue that affects habitats and species found at Richmond Park and that increases in recreation from the Local Plan has potential to result in increased pressure on these ecological features in the park. For stag beetle, impacts from increased recreational pressure from the Local Plan is not predicted to result in a Likely Significant Effect. For the majority of this species lifecycle, this species reliant on deadwood habitat located underground and as such impacts are considered to be limited and unlikely to result in a reduction in the extent and availability of this habitat for this species. The HRA will be updated to provided further detail on this. Wimbledon Common SAC is assessed at the Appropriate Assessment stage due the susceptibility of heathland habitats to recreational pressure and not in relation to stag beetle.
223	George Goodby, Environment Agency	Sequential Test Report & Level 2 SFRA	We welcome that the Sequential Test Report by Metis has been completed to support the Site Allocations. We look forward to working with you and/or reviewing the Level 2 SFRA which will also support the Site Allocations. Please refer to section 8.2 of your Level 1 SFRA (dated March 2021) for further information on the Level 2 SFRA.	Noted.
224	George Goodby, Environment Agency	Sustainability Appraisal and Sequential Test Report	The Sustainability Appraisal (SA) states that the assessments of the Local Plan objectives show that they have a largely positive effect when compared to the SA Framework. It goes on to state that no noteworthy policy gaps were identified, and no significant negative effects were established that required mitigation. There are, however, instances where there are uncertainties or potential tensions amongst objectives. One of the key areas where this arose is the impacts on heritage and the natural environment. Whilst it goes on to state that due to the large areas of protected open land and historic settlements in the borough it may limit opportunities for development. We would also advise that in addition to protected open land and historic	Noted. The Sustainability Appraisal of the Publication (Regulation 19) Local Plan has incorporated amendments where necessary and relevant. A reference is added in the summary section to reference the natural environmental features raised. The nature of the Sustainability Appraisal means that the assessment of specific SA objectives and policies is broad, and it is considered difficult to separate where

		<p>settlements, other natural environmental features such as river corridors and areas of high flood risk may also limit where development can be sustainably delivered.</p> <p>The Local Plan's draft policies were tested against the selected sustainability objectives outlined within the table on page 8. We feel the SA objectives are appropriately selected and represent the key environmental issues and opportunities across the London Borough of Richmond. However, we wish to comment on specific SA objectives and policies within the draft Local Plan to highlight where further opportunities are missed or where the significance/magnitude of the effects have not been accurately predicted.</p> <p>SA Objective: Adapt to the effect of climate change</p> <p>The SA summarises that the draft policy framework 'Delivering new homes and an affordable borough for all' would have a neutral or uncertain effect on the SA objective 'Adapt to the effect of climate change' This SA objective refers to adapting to the effects of a changing climate by protecting and managing water resources and avoiding or reducing flood risk from all sources. We would disagree with the conclusion that it has both a neutral or uncertain effect on this objective. The draft list allocated sites has designated a number of potential sites within Flood Zone 2 or 3. In addition, new development in 'town centres and local centres' may potentially not be required to apply the Sequential Test, thus potentially delivering a significant number of new homes in areas of high flood risk. We would refer to the current Strategic Flood Risk Assessment with regards to identifying the known effect of the proposed policies against this SA objective. The SFRA provides a robust evidence base to identify areas of the borough at risk of flooding and therefore can inform what risk any potential development may face and cause.</p> <p>In addition, section 4.3 Local and Town Centres states: <i>'There are five designated town centres and seven local centres in the borough. They are listed, along with further information, in Section 6.2 in the SFRA. The local Sequential Test approach dictates that the Sequential Test or Exception Test will not be required if the development proposal meets at least one of the following:</i></p> <ul style="list-style-type: none"> • <i>It is within a town centre or local centre boundary.</i> • <i>It is for residential development or a mixed-use scheme and within the 800m buffer area identified within the town centre or local centre (This was not included in the Screening Assessment to ensure that all sites at high risk were properly assessed)'</i> <p>Firstly, we would request confirmation that potential proposed developments within these designated areas are required to pass the Exception Test in line with the requirements of with Table 3: Flood risk vulnerability and flood zone 'compatibility' of the National PPG. For example, any proposed residential development within Flood Zone 3a is required to pass the Exception Test unless a change of use application. It would appear that certain types of development would not be required to pass the Exception Test under the draft Local Plan thus this local Sequential Test approach would be contrary to the NPPF. We seek clarification that the proposed sites that have been deemed not to require the Exception Test as outlined in Table 3-1 of the Flood Risk and Development Sequential Test report are exempt in accordance with Table 3 of the NPPG.</p> <p>In addition, policy framework 'Shaping and supporting town / local centres as they adapt and respond to the pandemic' is deemed not to be applicable to this particular SA objective. Given the potential flood risk in town centres and local centres, where factoring in the 800m, they all have some degree of Flood Zone 3a including an allowance for climate change as identified in the SFRA. Therefore, we would recommend that this policy framework is tested against this SA objective.</p> <p>Increasing biodiversity and the quality of our green and blue spaces, and greening the borough is concluded as having a very positive effect on this SA objective. Overall, we agree with this conclusion that it will have a very positive effect. Within policies Policy 34. Green and Blue Infrastructure and Policy 39. Biodiversity and Geodiversity we welcome the borough's approach to protect and enhance the borough's biodiversity and blue and green corridors</p> <p><i>Additional comments – Sequential Test Report</i></p> <p>Paragraph 1.1.1 only refers to the London Borough of Richmond being subject to fluvial and tidal flooding from the River Thames. We would recommend this section also references the fact that it is at risk of fluvial flooding from other tributaries of the River Thames as well e.g. River Crane and the Beverley Brook.</p> <p>We support paragraph 4.2.1 regarding islands and flood risk. We would recommend you consider our comments above [see comment 732] titled 'Paragraph 16.63 – Islands and functional floodplain designations' of the Draft Local Plan to refine this wording in the Sequential Test Report as well.</p> <p>Reduce pollution, minimise impacts of development</p> <p>This SA objective which states 'To reduce pollution (such as air, noise, light, water and soil), improve air quality and minimise impacts associated with developments.' is deemed to have a very positive effect on the following policy framework 'Increasing biodiversity and the quality of our green and blue spaces, and greening the borough'. We welcome the inclusion of this objective and agree that the Local Plan will have a very positive effect on this borough's biodiversity and green and blue spaces.</p> <p>In addition, the SA states that there is a very positive effect from 'Responding to the climate emergency and taking action' policy framework. Again, we agree with this assessment. We welcome the inclusion of policies 3, 7 & 9 which address potential pollution and other negative environment impacts which may cause both land and water pollution.</p> <p>We agree with this conclusion, however, feel that there is opportunity for the policy framework to provide a much greater positive effect.</p> <p>SA evidence base</p> <p>We welcome the updated Draft Revised Sustainability Appraisal Scoping which includes the strategies and plans we highlighted in our last consultation responses such as TE2100 plan and the Governments 25 year environment plan.</p>	<p>specific effects have not been accurately predicted as the assessment takes a much broader consideration, to form an overall score.</p> <p>See also the updated Flood Risk and Development Sequential Test accompanying the Publication (Regulation 19) Local Plan. See also response to comment 732.</p> <p>Note the suggestions for additional plans and strategies for the SEA/SA process, although at Stage C in the Sustainability appraisal process reflected in Planning Practice Guidance, there is no requirement to resource further updates to the Draft Revised Sustainability Appraisal Scoping Report at this stage. Instead it is considered appropriate that the additional plans and strategies are considered generally, to inform the Local Plan policy approaches and the update of the Infrastructure Delivery Plan, and take forward the issues raised in this general way.</p>
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225	Martin Ellis, South West London Clinical Commissioning Group (CCG)	General (in relation to health including Health Impact Assessment)	<p>Thank you for the opportunity to comment on the draft Local Plan. The comments are submitted by South West London Clinical Commissioning Group (CCG). Separate comments have been submitted by NHS Property Services. The CCG has worked closely with the Council's planning department and planning representatives regularly attend the Richmond Estates Forum.</p> <p>We note that a Health Impact Assessment (HIA) has been prepared which identifies the health and wellbeing impacts of the draft policies and site allocations.</p> <p>The draft Plan responds to the key challenges and trends facing the Royal Borough, including the longer-term impact of the Covid-19 pandemic, the climate emergency and population change. These key challenges will have an impact on healthcare services and wider health and wellbeing.</p>	Noted.
226	Martin Ellis, South West London Clinical Commissioning Group (CCG)	Paragraph 2.24	<p>We note that paragraph 2.24 refers to the borough as prosperous, safe and healthy. However, there is a difference in life expectancy between people living in the most affluent and most deprived areas. Health inequalities have been exacerbated during the Covid-19 pandemic.</p> <p>In comparison to other London Boroughs, Richmond is relatively less deprived. However, within the Borough there are pockets of deprivation. The most deprived wards according to the Index of Multiple Deprivation (IMD, 2019) include Ham, Hampton North, Heathfield, Mortlake and Barnes Common, and Whitton.</p>	Add reference to health inequalities in the strategic context. The pockets of deprivation are referenced at paragraph 2.27.
227	Heather Mathew, Richmond Council for Voluntary Service (CVS)	Paragraph 2.26	<p>2.26 In addition to an ageing population, it is important to highlight the high numbers of unpaid carers across the age ranges including older people, sandwich carers (care for a child and older relative) and young carers. Under the Care Act 2014, the local authority must make sure that residents:</p> <ul style="list-style-type: none"> • receive services that prevent their care needs from becoming more serious, or delay the impact of their needs • can get the information and advice they need to make good decisions about care and support • have a range of provision of high quality, appropriate services to choose from <p>The pandemic has further highlighted the support needs of both the cared for and the carer and the local authority must promote and consider the needs of the carer in relation to access to employment, education, and access to local services.</p>	Add reference to paid and unpaid carers in the strategic context.
228	Martin Ellis, South West London Clinical Commissioning Group (CCG)	Paragraph 2.26	<p>We support the reference in paragraph 2.26 to the need to ensure that health and care services respond to a changing and ageing population.</p>	Support noted.
229	Heather Mathew, Richmond Council for Voluntary Service (CVS)	Paragraph 2.27	<p>2.27 "A large proportion are employed in highly skilled jobs" Whilst employment rates are high in the borough these figures divert attention from the employment challenges and skills gaps for a number of targeted groups and risk increasing inequalities for these groups. Planning can play a part in highlighting the needs of these groups, and build in expectations of developers to</p>	Local employment opportunities and training programmes are promoted through new development through the requirements of Policy 50 and requirements for Local Employment Agreements. These are secured through Employment and Skills

			provide training, support, and employment opportunities that improve access and reduce inequity. In terms of employment, we know that for those who lack digital skills, those with low educational attainment, recent graduates, people aged 50+ seeking work and professions adversely affected by the pandemic such as retail and hospitality there are significant challenges. 6,070 young people age 16+ in Richmond are claiming universal credit or Job Seekers Allowance (LBRUT Children and Young People’s Plan refresh 2021) and the SEND Futures Plan, and the focus on transition highlights the employment needs of young people with SEND. Government initiatives such as the Kickstarter programme, and the Mayor of London’s mission “Helping Londoners into good work” are supporting activities such as the South London Partnership “Constructing South London” programme designed to build skills and match to work in the construction industry, but this is short term funding. The employment skills gaps and priority groups in Richmond need to be recognised in this plan, and where possible expectations made within the planning process that will generate opportunities for skills-based learning and employment for targeted groups.	Plans, that are based on the skills profile and training/employment needs of the borough. Clarification has been added to the supporting text on the implementation of LEAs to ensure they deliver specific and measurable outputs, with reference to the Council’s Employment and Skills Strategy (2021, updated September 2022).
230	Clare Snowdon	Responding to a changing environment - paragraph 2.33	2.33 I ask that we also declare a nature emergency - the ecological part of this crisis is too often overlooked and there is a very real danger of a "carbon land grab" which would see biodiversity displaced for offsetting and mitigation of the effects of greenhouse gas emissions	Policy 2 refers to the climate emergency and biodiversity crisis. Policy 39 protects biodiversity and clarifies the biodiversity mitigation hierarchy for where development would impact on species or a habitat. In the borough context with limited development opportunities, the priority throughout the Plan across thematic policies is for on-site provision and mitigation, rather than off-site offsetting.
231	Theresa Oddelm, The Royal Parks	Introduction, paragraphs 2.33 and 2.39 – comments specific to biodiversity and the Royal Parks’ Environmental Designations	2 Introduction <u>Responding to a changing environment (p12)</u> We welcome inclusion of paragraphs 2.33 and 2.39 on climate change and biodiversity, which recognise that 'additional residential development and population growth will likely bring more access pressure to the borough's parks and open spaces and make trampling and erosion potential issues. However additional issues of air pollution and light pollution should be identified and included.	This section is designed to generally set out the strategic context and trends, with paragraph 2.39 recognising the general importance of the multi-functional open space network. The Biodiversity Action Plan recognises specific threats from pollution, including in individual habitat and species action plans. Where development would impact on a species or habitat Policy 39 applies the mitigation hierarchy. Actions to improve pollution around sites that is not in relation to new development can be taken forward by the Council with local stakeholders, with generic and specific actions set out in the Biodiversity Action Plan.
232	Serge Lourie	Responding to a changing environment - paragraphs 2.33 – 2.40	I am delighted that the Council has declared a climate emergency and is making this the underpinning of the draft borough plan. However, I am concerned that this is not strong enough where the Climate Emergency conflicts with other policies and I think that its priority of the planning round Climate Emergency should be made explicit in the borough plan. It is not unusual for policies to conflict in a planning document and my experience, as a Trustee of Richmond Charity Almshouses has shown that there is a danger of priority being given to aesthetic and historical considerations in developments in conservation areas and of listed buildings There have been a number of pre planning and planning decisions but I would like to concentrate ofn an application to instal photovoltaics on Candler's Almshouses, 79 Amyand Park Road, TW1 3HJ. 21/3000/HOT This application was turned down on 15 October 2021 by "reason of its combined siting and design would result in an incongruous, prominent and cluttered form of development that iwould impact on the unaltered roofscape and important unified composition of the former (SIC. THEY STILL ARE ALMSHOUSES) almshouses and thus fail to preserve or enhance the setting, character and appearance (of the) conservation area... "As a result of not accepting that photovoltaics, in themselves are helping to reduce CO2 emissions, this decision flies in the face of the Council's declaration of a climate emergency and contributed to higher cost of the residents in social housing. .	The Plan places emphasis on reuse and conversion of existing buildings to minimise embodied carbon with a presumption in favour of refurbishment set out in Policy 2. The Council has prepared a Net Zero Carbon Study to support several policies in the Plan which set out ambitious targets for Richmond. There is no one-size-fits all approach or solution to accommodating sustainable energy measures in the historic environment, and further details are added to the supporting text of Policy 4 to recognise this conflict and how it is expected to be addressed on a case by case basis. Solar panels are already captured in Permitted Development right unless they are subject to Article 4 Directions or within a Conservation Area. A report to the Council’s Environment, Sustainability, Culture and Sports Committee on 6 September 2022 considered energy efficiency within the historic environment and included recommendations for producing additional planning guidance such as an update in the Solar Together guidance. The Government is consulting (February to April 2023) on changes to permitted development rights for solar equipment to further support the deployment of solar.
233	George Goodby, Environment Agency	Introduction Chapter ‘Responding to a changing environment’ (Paragraph 2.33 to 2.40)	At present, the earliest reference to the Thames Estuary 2100 Plan within the Local Plan is within Policy 8: Flood risk and sustainable drainage (Strategic Policy). We would encourage you to refer to the Thames Estuary 2100 Plan earlier on in this chapter, ‘Responding to a changing environment – paragraphs 2.33 to 2.40’. The TE2100 Plan sets out London’s flood risk strategy to the end of the century in response to a changing environment. We recommend the council include a summary of the issues and opportunities highlighted on page 82 of the TE2100 plan after section 2.38 or 2.39. A copy of the plan is available at Thames Estuary TE2100 Plan - GOV.UK (www.gov.uk) . Please note that the Richmond Policy Unit is located in the TE2100 Plan’s ‘action zone 1’ on page 82. We also have the summary below which you may find useful: “The Plan divides the estuary into 23 policy units which are each assigned a flood risk management policy depending on the acceptable level of flood risk based upon what is being defended. Policies dictate the programme of flood defence maintenance and improvement activities. <i>The Barnes & Kew policy unit has a Policy P5, to take further action to reduce flood risk beyond that required to keep pace with climate change. This means that the standard of protection against tidal flooding will be increased in the future. This will be achieved by improvements to the main tidal flood barrier on the Thames (currently the Thames Barrier at Charlton) together with improvements to the other flood defences e.g. river walls.</i> <i>As Richmond is affected by both tidal and fluvial flooding the Richmond and Twickenham policy units have a P3 (fluvial) and P5 (tidal) policy. Twickenham and Richmond policy units must have a P5 Policy for tidal flooding because the Thames Estuary 2100 Plan will allow higher water levels upriver of the Thames Barrier in the future. This will be on a regular basis. To offset this the flood defences in Twickenham and Richmond must be raised in the same way as other defences upriver of the Barrier to prevent regular tidal flooding of the riverside. The P3 policy is exclusively for fluvial flooding, to continue with existing or alternative actions to manage flood risk accepting that the likelihood of flooding will increase because of climate change. This is because how we use the Thames Barrier to manage flooding may change, this is to prolong the life of the Thames Barrier to protect from tidal flood risk.”</i>	Paragraphs 2.20 to 2.40 do not refer to other publications, except for the Council’s own Climate Emergency Strategy. This section is designed to generally set out the strategic context and trends, with reference to some facts and figures, so as to be easy to follow for all audiences. The references in Policy 8 are considered appropriate given that sets out the flood risk policy requirement for applicants demonstrating their proposals take into account the requirements of the TE2100 Plan. See also response to comment 717 in respect of further details added to the supporting text on flood risk mitigation and resilience. The TE2100 Plan is also referenced in the updated Infrastructure Delivery Plan.

			Recommended action: We recommend you include a summary of the issues and opportunities highlighted on page 82 of the TE2100 Plan within the Introduction, chapter 'Responding to a changing environment' after Paragraph 2.38 or 2.39.	
234	Clare Snowdon	Paragraph 2.36	2.36 I commend the borough on the reductions in emissions made so far and look forward to progress in that direction. I ask that planning embeds a requirement to move to renewables - possibly incentivising heat pumps and solar and eliminating dependence on gas	Noted. Moving away from gas is referenced. Add reference to 'other renewable heating technologies'.
235	Heather Mathew, Richmond Council for Voluntary Service (CVS)	Paragraph 2.36	2.36 Inevitably those who need the upgrades to their energy efficiency the most are those who can least afford it. There have been council run green energy grant and initiatives targeted at these households – what is the data from this telling us and is there learning that we can take forward to inform the energy efficiency work.	Noted. This is largely beyond the remit of the Local Plan, relating more to the Council's work on climate policy and projects. A report to the Council's Environment, Sustainability, Culture and Sports Committee in February 2023 on the delivery of the Council's Climate Emergency Strategy includes progress with grants and initiatives, along with actions to continue to deliver energy efficiency for those on low income or in poor energy efficient homes in the 2023 Action Plan.
236	Clare Snowdon	Paragraph 2.39	2.39 I wholeheartedly support the protection of biodiversity in the borough and the plan to extend green spaces. One of the key aspects here is connectivity - one of the core ideas behind Nature-Connected Neighbourhoods - and so I would welcome moves towards urban greening - for instance urban hedgerows, such as the space found at the back of Squires on Wellington Road (opposite Fulwell Bus Garage), which is filled with bird life. Perhaps businesses offering quality (and biocide-free) space for nature could receive a reduction in business rates?	Support noted. The Plan recognises the importance of the multi-functional network including small stepping-stone sites, as set out in Policy 34, and covering both designated and non-designated sites. Paragraph 2.39 is considered to reflect biodiversity issues in terms of the strategic context. See also response to comment 901.
237	Clare Snowdon	Paragraph 2.40	2.40 I fully support an increase in active travel in the borough and the idea of the 20 minute neighbourhood sounds promising. I would like to see further measures towards significant reduction in car journeys to schools, such as the school streets initiative. Perhaps this could be extended to make all side roads with school entrances residents and access only	The emphasis in the Plan is contributing to a modal shift away from the car, to minimise residents' trips made by car, recognising the borough has high levels of car ownership. The 20-minute neighbourhood concept is intended to encourage the development of vibrant communities that enable residents to complete everyday tasks such as shopping and accessing essential services by foot, bike, or public transport. Measures such as school travel are largely outside the remit of the Local Plan if they are not related to planning applications. A report to the Council's Transport and Air Quality Committee in November 2022 on Transport Priorities 2022-26, reported ongoing progress on the School Streets programme, with School Streets operational at 14 schools and 2 additional schools to be introduced in autumn 2022.
238	Clare Snowdon	Paragraph 2.42 in relation to the Corporate Plan objectives	2.42 I fully support this vision and these areas of focus	Support noted.
239	Clare Snowdon	Paragraph 2.44 in relation to Heathrow	2.44 I fully support the opposition to the expansion of Heathrow airport. Such plans have no place in a climate emergency	Support noted.
240	Catherine Rostron	Paragraph 2.44 in relation to Heathrow	I would like to say that I fully support the council's objections to any further expansion of Heathrow. No other major city has a main airport which adversely affects as many of its residents because of the flight paths as London and Heathrow. It is the most significant factor reducing the quality of life in the Kew region of the borough.	Support noted.
241	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	Paragraphs 2.44 and 2.45, in relation to Heathrow	<p>We propose Heathrow noise be given much more weight in the Local Plan, especially in response to the re- allocation of flight paths from Airspace Modernisation and the introduction of air taxis and drones. This is dealt with reference to the Introduction paragraphs 2.44 and 2.45.</p> <p>The only reference to Heathrow in the Local Plan is in Introduction Section 2.44 and 2.45, where it is stated that '<i>The Council, in line with the Mayor of London, strongly opposes any further expansion at Heathrow and supports measures to minimise the impacts of Heathrow, particularly on traffic, noise and air quality. The Council's position on Heathrow is set out in the Corporate Plan 2018 – 2022. This sets out that the Council remain opposed to the Government's decision to expand Heathrow Airport, a third runway and further night flights...</i>' '<i>The Council's Local Plan does not contain a policy on Heathrow as the airport does not lie within the borough boundary.</i>'</p> <p>There is an SPD: Development Control for Noise Generating and Noise Sensitive Development, 2018, which refers to Heathrow but in our view is substantially deficient in this respect.</p> <p>Government/CAA required Airspace Modernisation is fully underway with potentially substantial changes to flight path noise allocation, while Heathrow expansion is on hold and may never take place. The airspace is an important "asset" above Richmond residents (not only for Heathrow traffic but increasingly for air taxis, drones, etc).</p> <p>There is a set of Rules established by ICAO (the UN aviation body) for noise management which is the Balanced Approach. It sets the priorities - starting with reduction of noise at source (i.e. less noisy aircraft), followed by land use, operations and finally restricting traffic movements. Land use is about not developing housing and vulnerable uses and/or mitigating noise where there is significant noise impact on health and well being from overflight.</p> <p>There are other national noise policies that could be deployed to deal with Heathrow noise.</p> <p>At the moment the Noise England Statement on Noise 2010 uses a threshold of 51 decibels (LAeq) for daytime. Heathrow aircraft noise levels in Richmond borough are at least 60 dbA in some places. WHO Guidance threshold levels are 45 dbA day and 40dbA night.</p> <p>Under these circumstances, and given our long involvement as Richmond Heathrow Campaign, we recommend the Council develop a Planning Approach and Policy to deal with housing and other developments exposed to noise from Heathrow aircraft and from the emerging air taxis and drones. A number of developments, such as at Manor Road and Stag Brewery would be</p>	<p>As stated in the Plan, the airport does not lie within the borough boundary and therefore there is not a policy on Heathrow.</p> <p>Update the references to the Council's position to reflect the Corporate Plan 2022 – 2026.</p> <p>The UK Civil Aviation Authority has set out a vision for the future of UK airspace in January 2023 to help deliver quicker, quieter and cleaner journeys, as well as create more capacity for the benefit for those who use and are affected by UK airspace. The aviation and aerospace regulator has developed a refreshed Airspace Modernisation Strategy, which includes measures to introduce environmental sustainability as an overarching principle to be applied through all modernisation activities, and to provide a clear strategic path for regulatory policy and requirements. It makes it clear that the role of airspace modernisation in respect of noise impacts will be considered, and can be responsible for delivering noise reduction where it has an element of control.</p>

			significantly affected by aircraft noise, especially on arrivals under the Heathrow landing flight paths. But Airspace Modernisation will affect the whole borough potentially and while the 4 year process takes place there will be uncertainty and blight. We are engaged with Heathrow and other local authorities on this topic and would be pleased to contribute to Richmond council's future deliberations.	
242	Peter Willan and Paul Velluet, Old Deer Park Working Group	Paragraphs 2.44 and 2.45, in relation to Heathrow	<p>We propose Heathrow noise be given much more weight in the Local Plan, especially in response to the re- allocation of flight paths from Airspace Modernisation and the introduction of air taxis and drones. This is dealt with reference to the Introduction paragraphs 2.44 and 2.45.</p> <p>The only reference to Heathrow in the Local Plan is in Introduction Section 2.44 and 2.45, where it is stated that <i>'The Council, in line with the Mayor of London, strongly opposes any further expansion at Heathrow and supports measures to minimise the impacts of Heathrow, particularly on traffic, noise and air quality. The Council's position on Heathrow is set out in the Corporate Plan 2018 – 2022. This sets out that the Council remain opposed to the Government's decision to expand Heathrow Airport, a third runway and further night flights,..'</i> <i>'The Council's Local Plan does not contain a policy on Heathrow as the airport does not lie within the borough boundary.'</i></p> <p>There is an SPD: Development Control for Noise Generating and Noise Sensitive Development, 2018, which refers to Heathrow but in our view is substantially deficient in this respect.</p> <p>Government/CAA required Airspace Modernisation is fully underway with potentially substantial changes to flight path noise allocation, while Heathrow expansion is on hold and may never take place. The airspace is an important "asset" above Richmond residents (not only for Heathrow traffic but increasingly for air taxis, drones, etc).</p> <p>There is a set of Rules established by ICAO (the UN aviation body) for noise management which is the Balanced Approach. It sets the priorities - starting with reduction of noise at source (i.e. less noisy aircraft), followed by land use, operations and finally restricting traffic movements. Land use is about not developing housing and vulnerable uses and/or mitigating noise where there is significant noise impact on health and well being from overflight.</p> <p>There are other national noise policies that could be deployed to deal with Heathrow noise.</p> <p>At the moment the Noise England Statement on Noise 2010 uses a threshold of 51 decibels (LAeq) for daytime. Heathrow aircraft noise levels in Richmond borough are at least 60 dbA in some places. WHO Guidance threshold levels are 45 dbA day and 40dbA night.</p> <p>Under these circumstances, and given our long involvement as Richmond Heathrow Campaign, we recommend the Council develop a Planning Approach and Policy to deal with housing and other developments exposed to noise from Heathrow aircraft and from the emerging air taxis and drones. A number of developments, such as at Manor Road and Stag Brewery would be significantly affected by aircraft noise, especially on arrivals under the Heathrow landing flight paths. But Airspace Modernisation will affect the whole borough potentially and while the 4 year process takes place there will be uncertainty and blight. We are engaged with Heathrow and other local authorities on this topic and would be pleased to contribute to Richmond council's future deliberations.</p>	See response to comment 241.
Vision and Strategic Objectives				
243	Heather Mathew, Richmond Council for Voluntary Service (CVS)	General	Richmond CVS are pleased to have the opportunity to comment on the draft local plan. We are the local infrastructure organisation that supports and represents the interests of the Voluntary and Community Sector (VCS) in Richmond. We have submitted these comments to raise awareness of the value and contribution that the VCS bring to community development and sustainability, to highlight the needs of the sector as employers, service providers and owners/leaseholders of community buildings, and to create opportunities for investment into community buildings and services so that we are equal partners in future plans for the borough with particular reference to the 20 - minute neighbourhoods.	Noted.
244	Rob Cummins, RHP	Section 3 - Vision and Strategic Objectives	<p>RHP support the strategic objectives of the plan.</p> <p>These objectives included specific recognition of the need to deliver <i>"new homes and an affordable borough for all"</i> with a <i>"positive approach to incremental intensification ... and optimising delivery from larges sites to meet local housing needs."</i> The redevelopment of Ham Close will support this objective through the delivery of 452 homes.</p> <p>Other objectives, such as responding to the Climate emergency are tackled through the re-use of previously developed land, the introduction of renewable energy technologies, recycling of materials, sustainable urban drainage systems and adherence to the 20 minute neighbourhood principles.</p> <p>The redevelopment will also align with the strategic objective for <i>"securing new social and community infrastructure"</i> through a new community centre and makers lab at Ham Close.</p>	Support noted.
245	Mark Connell, Sphere25 on behalf of Hill Residential	3 Visions and Strategic Objectives	<p>Hill Residential support the strategic objectives of the plan.</p> <p>These objectives included specific recognition of the need to deliver <i>"new homes and an affordable borough for all"</i> with a <i>"positive approach to incremental intensification ... and optimising delivery from larges sites to meet local housing needs."</i> The redevelopment of Ham Close will support this objective through the delivery of 452 homes.</p> <p>Other objectives, such as responding to the Climate emergency are tackled through the re-use of previously developed land, the introduction of renewable energy technologies, recycling of materials, sustainable urban drainage systems and adherence to the 20 minute neighbourhood principles. The redevelopment will also align with the strategic objective for <i>"securing new social and community infrastructure"</i> through a new community centre and makers lab at Ham Close.</p>	Support noted.
246	Nina Miles, GLA on behalf of Mayor of London	Vision and Strategic Objectives	The Strategic Vision for growth 'The best for our borough' is informed by ten themes that have been developed since the Direction of Travel Consultation in 2020 and looks ahead over the next 15 years of the plan period to 2039 based on a 2024 adoption. The themes and objectives align well with the London Plan Good Growth policies including <i>Delivering new homes and</i>	Noted.

			<i>an affordable borough for all</i> with policy GG4 Delivering the homes Londoners need and <i>Increasing jobs and helping business to grow with policy GG5 Growing a good economy.</i>	
247	George Goodby, Environment Agency	Vision and Strategic Objectives Chapter - Local Plan Strategic Vision 'The best for our borough'	The first sentence of paragraph three discusses ' <i>responding to the climate emergency and taking action</i> '. We recommend that you also refer to 'reducing flood risk' after improving 'cutting emissions and improving air quality'. This is because large parts of the borough are impacted by flood risk, which with climate change may increase, and therefore tackling this should be a key part of the local plan. The wording could be updated to the following: " <i>The borough has been responding to the climate emergency and taking action, tackling the challenges of climate change, reducing flood risk, and cutting emissions and improving air quality, and following the principles of a circular economy</i> ". Recommended action: We recommend you include 'reducing flood risk' within the Local Plan Strategic Vision, specifically as part of 'responding to the climate emergency and taking action'.	Add reference to reducing flood risk in the vision in relation to responding to the climate emergency.
248	George Goodby, Environment Agency	Strategic Objectives - Responding to the climate emergency and taking action	The climate emergency and biodiversity crisis are inextricably linked; climate change is one of the main drivers for biodiversity loss, and the destruction of ecosystems undermines nature's ability to regulate greenhouse gas. Therefore, the two crises must be tackled together. This is a crucial point and should be stated in the strategic objectives. For bullet point 2 " <i>promote and encourage development to be fully resilient to the future impacts of climate change</i> ", consideration should also be given to using Nature Flood Management (NFM) techniques where possible. Allied with this is the protection and enhancement of rivers and river corridors. The focus here should be on re-naturalising the river wherever possible, encouraging soft engineering approaches to riverbank protection and incorporating an undeveloped buffer zone in the river corridor. This is aligned with requirements under the Water Framework Directive (WFD) which should be mentioned here. Local Authorities have a statutory duty to deliver WFD objectives under the Water Environment Regulations (2017) and much can be achieved through the planning system. Please see our Catchment Data Explorer for further information on the WFD status of waterbodies in the Borough.	The strategic objectives refer to protecting and referring the environment of the borough's rivers, and it is considered that re-naturalising and improving water quality would form part of this. See also responses to comments 739 and 992.
249	George Goodby, Environment Agency	Vision and Strategic Objectives Chapter – 'Increasing biodiversity and the quality of our green and blue spaces, and greening the borough'	In bullet point 8, we advise that you include reference to 'flood storage' in this section. This would recognise the multi-beneficial outcomes that protecting and naturalising our rivers can achieve. The wording could be updated to the following: ' <i>Protect and improve the unique environment of the borough's rivers, especially the River Thames and its tributaries as wildlife corridors, as flood storage, as opportunities for recreation and river transport, increasing access to and alongside the rivers where appropriate, and gain wider local community benefits and habitat improvements when sites are redeveloped</i> '. Recommended action: We recommend you include 'as flood storage' within the 'Increasing biodiversity and the quality of our green and blue spaces and greening the borough' strategic objective.	Add reference to flood storage as one of the multi-functional benefits in relation to rivers.
250	George Goodby, Environment Agency	Vision and Strategic Objectives Chapter - Improving design, delivering beautiful buildings and high-quality places	Within bullet point two of the strategic objective of 'Improving design, delivering beautiful buildings and high-quality places' we recommend that you include 'resilient to climate change'. This would reiterate the council's focus on the climate emergency and demonstrates to applicants that it is key to consider climate change from the beginning of the design process rather than an after thought. For example, if finished floor levels need to be raised to protect a building from flood risk then this needs to be considered in the design and access arrangements from the start to ensure the building interacts well with its surroundings. The wording could be updated to the following: ' <i>Provide a positive approach to accommodate growth across the borough, enabling tall buildings and higher density development in appropriate locations, where all development is of high design quality to create well-designed, meaningful, practical, resilient to climate change, and well-connected places</i> '.	Add reference to climate resilience in relation to high quality development.
251	Charlotte Orrell, DP9 Ltd on behalf of London Square Developments	Strategic Objectives	Strategic Objectives – Climate Emergency and Biodiversity, green and blue spaces The need to respond to the climate emergency and tackling the challenges of climate change, cutting emissions and improving air quality, and following the principles of a circular economy is recognised and supported. We advocate the need to meet high standards for sustainable design, increased urban greening and tackle biodiversity loss. Notwithstanding this, these standards need to align with those in the London Plan. They also need to be considered as part of planning balance when determining applications and applied flexibly where specific site circumstances or competing planning considerations mean that minor deviations are necessary. Strategic Objectives – Delivering new homes and an affordable borough for all We support the aspiration to deliver new homes and an affordable borough for all through the increase in housing delivery on small sites and optimising large sites to deliver a minimum of 411 new homes per annum. London Square are seeking to deliver a significant number of new homes, including affordable provision within the borough which is in line with this strategic objective and in conformity with the London Plan. Notwithstanding this, we note that the Richmond Local Housing Market Assessment (2021) identifies an increased need for 1,123 affordable homes per annum and states that " <i>affordable housing delivery – including most prominently for London Affordable Rent/social rent - should be maximised where opportunities arise</i> ". This key strategic objective could therefore be more effectively realised with more brownfield and larger sites, such as the former Greggs bakery, being allocated for residential or mixed use development. Strategic Objectives – Jobs and Business The need to increase jobs and achieve business growth following the pandemic is understood and supported. However, we do not support the blanket approach to protecting the borough's Key Business Areas and industrial land and business parks. NPPF (2021) paragraph 8 states the economic objective of the Framework is to 'help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure'. Paragraph 122 of the NPPF also notes that:	Note the support for the strategic objectives in relation to the climate emergency, biodiversity, green and blue spaces. The Council considers the policies to be ambitious and help address the action needed to tackle the impacts of climate change. To support these policies the Council has prepared a Net Zero Carbon Study, and the requirements have also been tested as part of the Whole Plan Viability Assessment. See responses to comments 693 and 699. Note the support for the strategic objectives in relation to delivering homes, and jobs and businesses. The approach to protecting the borough's Key Business Areas and industrial land and business parks is considered justified, see the update to the Employment Land & Premises Needs Assessment which recommends a stringent policy to resist losses. See response to comment 843 in regard to Greggs.

			<p><i>‘Planning policies and decision need to reflect changes in the demand for land. They should be informed by regular reviews of both the land allocated for development in plans, and of land availability. Where the local planning authority considers there to be no reasonable prospect of an application coming forward for the use allocated in a plan:</i></p> <p><i>a) It should, as part of plan updated, reallocate the land for a more deliverable use that can help to address identified needs (or, if more appropriate, deallocate a site which is undeveloped);’</i></p> <p>The Greggs Site has been out of operation and marketed since February 2018 without interest from potential occupiers. The Site has therefore been underutilised for nearly four years and has failed to support growth, innovation and improved productivity in line with the NPPF during this time. Due to the specific site constraints, relating to highways, access and amenity issues no planning application for continued employment use has been put forward since the closure of the bakery. Whilst these constraints remain, there is no reasonable prospect of an application coming forward for a solely employment use and therefore in line with NPPF policy, the Site as part of the updated plan should be reallocated for a more deliverable use that can help to address identified needs. In this instance, due to the surrounding residential context, the Site clearly provides opportunities to contribute to meeting the housing target in Strategic Policy 10 and growth aspirations for this part of the borough.</p> <p>A more flexible and site-specific approach would also align with the London Plan, where Policy E7 requires LPAs to identify opportunities for industrial “intensification, co-location and substitution” based on a robust evidence base and assessment of each site’s suitability for continued industrial use, including the introduction of other uses if “there is no reasonable prospect of the site being used for the industrial and related purposes.” There is no evidence of Richmond applying this criteria-based approach to the continued designation of Greggs bakery for employment use only, meaning this policy is unjustified and ineffective at encouraging business growth.</p>	
252	Theresa Oddelm, The Royal Parks	Strategic Objectives – comments specific to biodiversity and the Royal Parks’ Environmental Designations	<p>Strategic objectives (p16 onwards)</p> <p>We welcome the prominence of climate change, culture and heritage and biodiversity within the strategic objectives.</p>	Support noted.
253	Luke Burroughs, Transport for London (TfL) Commercial Development	General comment in relation to TfL Commercial Development and the vision	<p>Thank you for providing the opportunity to comment on the Local Plan Regulation 18 consultation.</p> <p>Please note that our representations below are the views of the Transport for London Commercial Development (TfL CD) planning team in its capacity as a landowner in the borough only and are separate from any representations that may be made by TfL in its statutory role as the strategic transport authority for London. Our colleagues in TfL Spatial Planning have provided a separate response to this consultation in respect of TfL-wide operational and land-use planning / transport policy matters as part of their statutory duties.</p> <p>Local Plan Strategic Vision ‘The best for our borough’</p> <p>TfL CD broadly supports Richmond’s strategic vision for the borough. We are particularly supportive of the strategic objective to meet housing targets set out in the London Plan and to “<i>maximise delivery of genuinely affordable housing across the borough</i>” TfL CD is committed to delivering 50% affordable housing (by habitable room) across its portfolio as instructed by the Mayor and look forward to working with the Council to achieve this on TfL owned sites in the borough.</p> <p>We are also supportive of the borough’s commitment to “<i>Provide a clear pathway to zero-carbon for all types of new development, to minimise and mitigate the effects of climate change by requiring high levels of sustainable design and construction including reductions in carbon emissions</i>”. TfL has recently published its sustainable development framework which aims to maximise social, environmental and economic sustainability on TfL development across London.</p>	Noted.
254	Martin Ellis, South West London Clinical Commissioning Group (CCG)	Vision and Strategic Objectives	<p>The plan’s Vision is shaped by other Council plans and strategies. We suggest that reference is made to the Joint Health and Wellbeing Strategy and the Richmond Health and Care Plan under a new section perhaps titled ‘A healthier borough’. We support the Vision itself and the references to securing new social and community infrastructure and creating safe, healthy and inclusive communities.</p> <p>We note that the Strategic Objectives reflect the Vision. We welcome the objective to secure new social and community infrastructure but suggest additional wording “to ensure that health and care services and infrastructure are provided to support and growing and changing population”.</p> <p>We welcome the objective to create safe, healthy and inclusive communities, but suggest additional wording “to support development that promotes healthy lifestyles and reduces health inequalities” to reflect Policy 51. Health and Wellbeing. We note that the final bullet point refers to the environmental impacts of development. The health and wellbeing impacts of development extend beyond environmental issues and impacts and we suggest that the wording is amended to read: “Ensure that development does not a negative impact on health, safety and the amenity of existing and new users or occupiers of a development or those living or working in the surrounding area.”</p>	<p>Add a reference to the Joint Health and Wellbeing Strategy in section 2 and in the supporting text to Policy 51.</p> <p>Add a reference in the vision to health and care services and a contribution to reduced health inequalities.</p> <p>Add a reference in the strategic objectives to health and care services in relation to health as a cross cutting priority.</p> <p>Add reference to ‘those in’ the surrounding area to clarify impacts of development extend wider; it not considered necessary to refer to those living and working, as that would exclude other visitors.</p> <p>It is not considered necessary to add a new section for ‘a healthier borough’, as the structure of the vision and the strategic objectives is around the ten themes; it is felt that health is referred to sufficiently.</p>
Spatial Strategy, Place-based Strategies and Site Allocations				
255	Nina Miles, GLA on behalf of Mayor of London	Spatial Strategy	<p>We welcome the overarching aim to direct new higher density development to sites in town centres or places that are well connected by public transport, walking and cycling to jobs, services, infrastructure and amenities. This aligns with London Plan Good Growth objective GG2 Making the best use of land and London Plan town centre policies SD6 and SD7.</p> <p>We support the 20-minute neighbourhood and ‘living locally’ concept that underpins much of the plan. This aligns with the London Plan’s Healthy Streets Approach to reducing car dominance and increasing walking, cycling and public transport use (Policy T2 LP2021) as well as London Plan Good Growth objectives GG1 and GG2.</p> <p>Spatial Policy 2 is welcomed, particularly part B with regards to prioritising previously developed land and the support for refurbishment over demolition. This aligns with London Plan Policy D3 and the circular economy principles of minimising the use of new materials. The reference to the London Plan’s Good Growth objectives in paragraph 4.17 is welcomed and supported.</p>	Support noted.

256	Tim Harrington	Omission - sites	<p>My response relates to what is missing from the local plan rather than what is in it, so I cannot give detailed page numbers etc. There appear to be many plots of land which are not included in the local plan (examples to follow below). My questions is why are some plots of land included when others are not for example Richmonf Athletic Club is included but Richmond Cricket Club is not?</p> <p>Land which should be considered to be included would be the building next to the BP garage on the lower Mortlake road, North West of Manor Circus Roundabout which has been unsued for a decade and is now a car wash ? This building needs a vision to get it back into use either for residentia or commercial use. Also the plot of East land on the Sandycombe road, which was a old second hand car garage and has remained derilct for many years, why is this plot not included in the plan?</p>	<p>The Site Allocations include sites where development is likely or encouraged to come forward, and to specify the land uses and other policy aspirations the Council would support on those such sites. Richmond Athletic Association was an existing Site Allocation, as the potential for upgrading and other uses have been put forward in the past. The Old Deer Park SPD includes the Old Deer Park Sports Ground used by Richmond Cricket Club, but no issues have been identified with the existing provision.</p> <p>There will be other small-scale brownfield sites across the borough, but they do not need Site Allocations to bring them forward. Sites that were in commercial use, such as car garages, are likely to be protected by employment policies.</p>
-	Matthew Bolton	Omission - sites	[See comments 177 and 286 in relation to place-based strategy for Hampton & Hampton Hill and other sites that should be included]	Noted that Homebase on the Twickenham Road, Hanworth and Hampton Telephone Exchange have been added as Site Allocations.
257	Michael Cross	Spatial Strategy, Place-based Strategies and Site Allocations (in relation to site opportunities)	General point around the sites for potential development, and I would have thought there are additional ones e.g. the carpark at Richmond railway station could be converted/demolished and replaced by commercial property. The whole of Richmond railway station could be configured with development across the top by building upwards on the site.	The Site Allocation for Richmond Station includes the multi-storey to the south and the open car park to the north. The station is designated as a building of townscape merit, the visual character lies principally in the façade and booking hall. The Site Allocation sets a vision for any future proposal to be considered. The Urban Design Study has informed the tall and mid-rise building zone, which have been drawn so as not to preclude any station redevelopment which may come forward in future as part of a comprehensive masterplan proposal. Any future station proposals would need to be supported by appropriate townscape and heritage analysis and 3D modelling.
258	Alice Roberts, CPRE London	Spatial Strategy, Place-based Strategies and Site Allocations (in relation to site opportunities)	<p><u>The Borough does not appear to have carried out a rigorous study to unearth all the opportunities available to meet this unmet need</u>, for example:</p> <ul style="list-style-type: none"> • The Mayor of London’s Fulwell Landholding is next to a railway station and the parts used for a single storey supermarket, DIY store and surface parking should be redeveloped with air-rights housing • The Uxbridge Road Sainsbury’s (site allocation 5) could have air-rights housing above the main store too and not just the car park • The Hanworth Homebase on Staines Road could be redeveloped for air-rights housing (the Hanworth sites in LBRuT) • There needs to be a detailed assessment of all town centres to establish the housing potential and infrastructure needs 	<p>To inform the housing target set in the London Plan, a detailed Londonwide strategic housing land availability was undertaken. In line with the NPPF and the London Plan there is the expectation to optimise the use of land, with an uplift in density of residential development.</p> <p>The Site Allocations across the borough comprise key sites that will assist with the delivery of the spatial strategy of the Plan, to ensure there is sufficient land for future needs, however other sites will continue to come forward.</p> <p>Fulwell Bus Garage and Homebase on the Twickenham Road, Hanworth have been added as Site Allocations.</p> <p>The Urban Design Study, developed alongside other evidence base work, identifies the capacity for growth in the borough using the findings of the characterisation study.</p>
259	Alec Lever, Richmond Labour Party	General comments (in relation to site opportunities)	<p>Rather than dissipate our constructive contributions to the plan with detailed prescriptions for action in each locality as this template requires, we offer these ideas for consideration, missing in the space allocation proposal.</p> <p>Plan to allocate space for;</p> <ol style="list-style-type: none"> 1. NHS Surgeries 2. Pre-school Sure Start nurseries 3. Local Police & CSO4 outposts 4. A Richmond Magistrates Court 5. Two hands-on experience centres for primary and secondary pupils to excite interest in future skills .e.g. Robotics, VR, 3D printing, renewable energy localisation, Net Zero jobs. 6. Green Homes adaptation work spaces along the value chain including manufacture. 7. Public transport hubs for 10 seat hail and ride EVs in underserved 'long walk' wards. 8. EV street charging points 9. Increasing social housing provision in redevelopment sites beyond current proposals which allocate the incremental homes to expand private buy to let sector market sales. 	<p>The Infrastructure Delivery Plan 2023 identifies future infrastructure and service needs for the borough. Specific types of needs are generally identified and brought forward by providers, rather than the Council allocating space that may not be needed.</p> <p>The Plan emphasises the use of multi-use spaces, that can be used flexibly and adapt to changes to serve the local community. The flexibility of Class E may also mean some changes of use do not require planning permission.</p> <p>Note Richmond Magistrates Court was closed as the HMCTS found the site surplus to operational requirements and closed in 2016. It is also noted that use of alternative venues and digital infrastructure play a role in the future estates’ strategy, and no local needs have been identified at this time.</p> <p>It may be that some needs are met by sub-regional or regional provision, such as experience centres.</p> <p>Some of these uses are beyond the remit of the Local Plan, unless directly relevant to new development. See also response to comment 552 on EV charging.</p>
260	David Wilson, Thames Water	Draft Site Allocations (general)	<p>As you will be aware, Thames Water are the statutory water supply and sewerage undertaker for the Borough and are hence a “specific consultation body” in accordance with the Town & Country Planning (Local Planning) Regulations 2012. These representations are also prepared on behalf of Thames Water as a landowner within the Borough, and we refer to previous submissions to the ‘Call for Sites’. [See comment 261 in relation to Call for Sites]</p> <p>Draft Site Allocations</p> <p>The information contained within the new Local Plan will be of significant value to Thames Water as we prepare for the provision of future water supply/wastewater infrastructure.</p> <p>Process</p> <p>We use the information in local plans to estimate when upgrades will be required. It is therefore important that the local authority keep us informed of any changes to local plan numbers and how well they are delivering homes against those objectives. Where this doesn’t happen it could lead to delays in the delivery of vital infrastructure</p> <p>Network</p> <p>Where offsite upgrades are required to serve development they will be delivered and funded by Thames Water using infrastructure charges more info here https://www.thameswater.co.uk/developers/charges</p>	<p>Noted.</p> <p>To inform future infrastructure planning for providers, the detailed completions and five year housing supply are set out in the annual Housing AMR. Future infrastructure to support growth is addressed as part of the updated Infrastructure Delivery Plan.</p> <p>Policy 9 deals with water and sewerage provision, and see response to comment 736 with further supporting text added to clarify the responsibilities of developers and water companies, including encouraging early discussions.</p> <p>See responses to the individual comments which deal with particular Site Allocations.</p>

			<p>The attached table provides Thames Water’s site specific comments from desktop assessments on water supply, sewerage/waste water network and waste water treatment infrastructure in relation to the proposed sites, but more detailed modelling may be required to refine the requirements.</p> <p>Early engagement between the developers and Thames Water would be beneficial to understand:</p> <ul style="list-style-type: none"> • What drainage requirements are required on and off site • Clarity on what loading/flow from the development is anticipated • Water supply requirements on and off site <p>The time to deliver upgrades shouldn’t be underestimated it can take 18months – 3 years from the time of certainty and in some cases it may be appropriate for a suitably worded planning condition to be attached to ensure development doesn’t outpace the upgrades. Developers are encouraged to engage at the earliest opportunity to discuss their development needs via Thames waters pre planning service https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/water-and-wastewater-capacity</p> <p>We recommend developers attach the information we provide to their planning applications so that the Council and the wider public are assured water and waste matters for the development are being addressed. Please also refer to detailed comments above in relation to the infrastructure section.</p> <p>Where developers do not engage with Thames Water prior to submitting their application, this will more likely lead to the recommendation that a Grampian condition is attached to any planning permission to resolve any infrastructure issues.</p> <p>We are also in the process of creating long term drainage and wastewater management plans (DWMP) with objectives that overlap with those for Richmond, such as sustainable drainage and water management. The local plan shows support from Richmond for sustainable surface water drainage and engaging with relevant stakeholders because of the flooding risk, which we also support. Thames Water is addressing sewer flooding risk and welcomes support from the council to mitigate misconnections into the foul and surface water sewers.</p> <p>[See comments 293, 304, 306, 516, 528, 536, 538, 553, 561, 577, 607, 613, 630, 656, and 667, for the details from the attached table which relate to a number of site allocations]</p>	
261	David Wilson, Thames Water	<p>Site Allocations – Call for Sites – Land to West of Stain Hill West Reservoir, Hampton Water Treatment Works, Upper Sunbury Road and Hydes Field, Land to North of Hampton Water Treatment Works, Upper Sunbury Road</p>	<p>Thames Water previously put forward the following to the ‘call for sites’ in 2020 (Respondent Ref: 74):</p> <p>1. Land to West of Stain Hill West Reservoir, Hampton Water Treatment Works, Upper Sunbury Road: Site area: approximately 3.58 hectares (refer to enclosed location plan). Current use: vacant land/retained operational land. Proposed use: residential or mixed use development. Likely availability: 1-5 years.</p> <p>The site is currently within the Green Belt, but is very well contained and sandwiched between the Stain Hill West Reservoir to the east and residential development along Kenton Avenue with Upper Sunbury Road forming the northern boundary and Lower Hampton Road forming the southern boundary.</p> <p>We disagree with the Green Belt review and consider the site does not perform strongly in Green Belt terms. The Green Belt review is unclear as to which settlement sprawl is being referred to as the River Thames separates Molesey and Hampton and this part of Green Belt is not strategic in the whole parcel (i.e. the assessment of the parcel in its entirety leads to a flawed judgement and assessment of the Green Belt). There is a broken Green Belt connection around the land to west of Stain Hill West Reservoir. It is therefore considered that the site should be removed from the Green Belt.</p> <p>2. Hydes Field, Land to North of Hampton Water Treatment Works, Upper Sunbury Road: (refer to enclosed location plan). Current use: retained operational land and 3rd party leases Proposed use: the site was previously put forward for water infrastructure and mixed use development. The site is currently being assessed for new Water Supply development as part of Thames Water’s new Water Resource Management Plan. The site is being proposed as a new effluent treatment plant for water supply.</p> <p>This site is currently within the Green Belt, but is also well contained and sandwiched between development along Oldfield Road and Portlane Brook (with Kempton Racecourse beyond) with Upper Sunbury Road forming the southern boundary and the railway line to the north. We disagree with the Green Belt review and consider the site does not perform strongly in Green Belt terms. The Green Belt review is unclear as to which settlement sprawl is being referred to as the River Thames separates Molesey and Hampton and this part of Green Belt is not strategic in the whole parcel. It is therefore considered that the site should be removed from the Green Belt.</p> <p>London’s water needs are the key driver for the strategic resource options programme which supports the development and delivery of strategic schemes that will provide long term resilience to clean water provision for the region. This site represents a large landholding strategically located near key existing sewage treatment sites (Mogden STW in LB Hounslow and Hogsmill STW in RB Kingston upon Thames), water treatment sites (Hampton WTW; Kempton WTW; Walton WTW) and a number of reservoirs in south west London and therefore is critical to supporting this strategic development. As such, it is considered that exceptional circumstances exist to release this site from the Green Belt in order to ensure the delivery of critical infrastructure is made more straightforward within the planning system.</p> <p>The above sites are currently retained operational land but are included in a review that Thames Water is carrying out of its landholdings to establish both strategic needs for future infrastructure (Hydes Field), and also whether a site can be released for redevelopment (land to West of Stain Hill West Reservoir). Consistent with that review process and to ensure appropriate</p>	<p>Land to West of Stain Hill West Reservoir: The Arup Open Land Review 2021 assessed the site as part of GA5. This was a Stage 1 MOL assessment which is strategic in nature and did not consider detailed boundary issues or variations within minor areas of a parcel. The assessment acknowledged the different characters within each General Area and considered whether parts of the General Area performed weakly against each NPPF purpose in the case of Green Belt or London Plan criterion in the case of MOL, and should therefore be considered for further assessment as part of a Stage 2 study. Overall, the whole of the GA5 was assessed as performing strongly against NPPF purposes and no weakly performing sub-areas were identified for further assessment.</p> <p>As set out in the assessment, the boundary between GA5 and the Ashford/ Sunbury-on-Thames/ Stanwell large built up area is readily recognisable and likely to be permanent comprising the regular backs of residential properties and gardens. GA5 provides a barrier to the outward sprawl of the large built-up areas. GA5 forms the entire gap between Hampton Village, Molesey and Sunbury-on-Thames and provides a physical and visual buffer to the merging of settlements.</p> <p>Hydes Field: The Arup Open Land Review 2021 assessed the site as part of GA4. This was a Stage 1 MOL assessment which is strategic in nature and did not consider detailed boundary issues or variations within minor areas of a parcel. The assessment acknowledged the different characters within each General Area and considered whether parts of the General Area performed weakly against each NPPF purpose in the case of Green Belt or London Plan criterion in the case of MOL, and should therefore be considered for further assessment as part of a Stage 2 study. Overall, the whole of the GA4 was assessed as performing strongly against NPPF purposes and no weakly performing sub-areas were identified for further assessment.</p> <p>As set out in the assessment, the boundary between GA4 and the Ashford/ Sunbury-on-Thames/ Stanwell large built up area is durable, consisting of Staines Road East and Park Road as well as the backs of residential properties and gardens adjacent to Greater London. GA4 plays a very important role in preventing the sprawl of Ashford/ Sunbury-on-Thames/ Stanwell and Greater London at this location. GA4 forms the entire gap between Sunbury-on-Thames and Hampton Village and it is considered that development in this General Area would lead to the physical and perceptual merging of neighbouring built up areas</p>

			<p>development plan support is available for these potential essential infrastructure developments, it is also considered that the Hydes Field site should be allocated in the new Local Plan as a future infrastructure development site, with its use defined as for water and / or wastewater infrastructure provisions.</p> <p>[See Appendix 2 for site location plans for Hydes Field, Hampton Water Treatment Works and Land west of Stain Hill Reservoirs]</p> <p>There may also be other landholdings within the locality that may be suitable for development and Thames Water would be pleased to discuss the potential for making these sites available further with the Borough. There is therefore an opportunity for the sites to contribute towards landscape and biodiversity enhancement, which would be supported by allowing some essential infrastructure development. Any future use of these sites would be expected to integrate the provisions of emerging policy in respect of biodiversity net gain, and local requirements relating biodiversity and landscaping, to ensure their strategic future development is appropriately integrated within their receiving environments.</p>	<p>Future infrastructure to support growth is addressed as part of the updated Infrastructure Delivery Plan. If any critical projects are brought forward in future for essential infrastructure, these would need to be considered against Policy 35.</p>
262	Tim Catchpole, Mortlake with East Sheen Society	Site Allocations – Call for Sites – Schedule of Sites not taken forward as Site Allocations: Richmond Park Academy and Christ’s School	<p>We note with concern the Council’s statement that the Stag Brewery Site Allocation is taken forward in the draft Local Plan and still includes a new 6-form entry secondary school in line with the Council’s School Place Planning Strategy. We disagree with this element of the site allocation for reasons given above.</p>	<p>See response to comment 652.</p>
263	Tim Catchpole, Mortlake with East Sheen Society	Site Allocations – Call for Sites – Schedule of Sites not taken forward as Site Allocations: Mortlake Station area	<p>We note with concern that the Mortlake station area is now excluded since its “fragmented ownership means that it is unlikely to come forward as a comprehensive site or be deliverable”. We do not agree with this. The station area is a dangerous and unwelcoming area. Much of the land that holds the key to a comprehensive improvement is owned by Network Rail and is let on short leases.</p>	<p>See response to comment 644 and 1044. See also response to comment 640, a reference has been added in the place-making strategy to include the mention of improved accessibility with regards to aspirations for Mortlake Station and outside public realm.</p>
264	James Sheppard, CBRE, on behalf of LGC Ltd	Site Allocations – Call for Sites – LGC site	<p>7. Summary: It is disappointing that after such a long period of Local Plan engagement, including in respect to the now adopted Local Plan, that the wide-ranging benefits of a mixed-use redevelopment in this location have not translated into an allocation. In our strong view, the site lends itself well to a mix of employment and residential uses. The sustainably located, brownfield site can provide for a comprehensively master planned, mixed-use development that retains LGC in the borough, provides new employment space for new, expanding and relocating businesses and delivers much need homes. Importantly, it is clear from the continued under-delivery of affordable housing that the site could serve as a productive and effective contributor to the Council’s affordable housing land supply over the forthcoming plan period. In addition, redevelopment could successfully activate the street scene, provide new high-quality publicly accessible green spaces, enhance permeability and promote active travel, be outward facing and connect with the local urban design vernacular. A new, fit-for-purpose building that meets the current and future needs of this modern, high-technology, knowledge-based employer is vital. LGC attracts highly skilled employees in the life sciences sector. It is broadly accepted that a borough’s ‘stock’ of high skilled workers is one of the key determinants of its economic performance. Thriving local economies require a local workforce with high levels of employability. It should be that employment and skills are drivers of local economic growth. A motivated, flexible, and skilled workforce attracts employers and boosts productivity. Aside from the demonstrable economic benefits there are also a broad number of social and demographic benefits. Indeed, without opportunities for skilled work, the local authority will risk an ageing workforce as young people will ultimately relocate from such an area in search of higher skilled work, training and other benefits elsewhere. It is evident that LGC contribute economically to LBRuT, however, it is not solely the economic value that is important, but also the global reputation of scientific excellence that it provides within the life sciences sector, which is directly associated with Teddington. There is a compelling case for enabling development in this instance, whereby LGC can continue to reside and operate its headquarters from the borough for many years to come, retaining highly skilled employees within a renowned and growing business of both national and global significance. In summary, a proportion of the site is surplus to LGC requirements, whilst the headquarters facility requires substantial modernisation through redevelopment. A sustainable mixed-use allocation including for both employment and residential use would be both suitable and appropriate enabling development, allowing LGC to have a continuing presence in Teddington for the long term. Any mixed-use development proposal for the site would actively seek to make effective use of land, re-providing and enhancing net existing employment floorspace whilst providing for significant housing delivery, including much needed affordable housing. The Council’s support would be strongly welcomed, helping to secure LGC within the borough whilst simultaneously protecting Teddington’s rich scientific heritage long into the future..</p>	<p>See response to comment 841.</p>
265	Philip Villars, WSP on behalf of Sharpe Refinery Service Limited	Schedule of sites not taken forward as Site Allocations – Arlington Works	<p>- the schedule refers to our client’s site as respondent no. 81. We have stated in comments on Policy 8 that the contribution that the site could make to the area has been dismissed and does not accord with the principles of paragraph 16 of the NPPF. However, there are factual inaccuracies within the reason column of the document. Arlington Works is not a designated Locally Important Industrial Land and Business Park within the adopted Local Plan, Policy LP42. It includes Twickenham Studios within the list but does not include Arlington Works and no evidence has been submitted to the contrary. We are therefore of the view that the supporting evidence base of the new Local Plan would not meet the tests of soundness set out within Section 3 of the NPPF and case law. Changes considered necessary in relation to the Schedule of Sites Not Taken Forwards: The detail within the reason column is factually incorrect and should be corrected. Within the meaning of Paragraph 31 of the NPPF the Schedule of Sites Not Taken Forwards does not provide a relevant or accurate evidence upon which to base a site allocations policy.</p>	<p>The ‘Schedule of sites not taken forward as Site Allocations in the new Draft Richmond Local Plan’ was produced as an informal supporting document to assist any stakeholders responding to the consultation, to briefly set out the reason a site was not being taken forward, because the comments received on the Direction of Travel consultation were not responded to individually. It did not form part of the evidence base. Apologies that it contained an error in respect of Arlington Works; it is not designated as a Locally Important Industrial Land and Business Park within the adopted Local Plan (2018). It’s loss as a non-designated industrial site was considered in the Appeal (ref. APP/L5810/W/20/3249153) in January 2021, and that sets out the policy context which applies to the site. See also response to comment 839.</p>

266	Luke Burroughs, Transport for London (TfL) Commercial Development	Schedule of sites not taken forward as Site Allocations – Fulwell Bus Garage and Lidl	<p>Place-based Strategy for Twickenham, Strawberry Hill & St Margarets</p> <p>We are supportive of the Council’s recognition that this area is an appropriate location for growth. TfL has two significant landholdings in this area.</p> <p>Fulwell Bus Garage and Lidl</p> <p>It is disappointing that the TfL Land at Fulwell Bus Garage and Lidl has not been allocated for development despite TfL promoting this site in the previous call for sites.</p> <p>In the ‘<i>Schedule of sites not taken forward as Site Allocations in the new Draft Richmond Local Plan</i>’ the following reason is given for Fulwell Bus Garage not being included as a site allocation in the Local Plan:</p> <p><i>The bus garage is in use with no plans for the operations to cease. The loss of existing bus garages is resisted in the draft Local Plan, to safeguard capacity for efficient and sustainable operation of the network. The building is also designated as a Building of Townscape Merit (BTM). There are no details of any comprehensive approach to bringing forward redevelopment of the wider site.</i></p> <p>As TfL CD set out in our response to the ‘Consultation on the Local Plan Direction of Travel and Call for Sites Consultation’ in March 2020, the bus garage use would be re-provided to support the efficient and sustainable operation of the network consistent with London Plan and emerging Local Plan policies that protect bus infrastructure. The reference to Fulwell Bus Garage being a Building of Townscape Merit and thus not being able to be developed does not account for the potential to incorporate the buildings into a wider scheme. The wording also does not reflect the significant benefits that a redevelopment could bring to the area, particularly in terms of permeability and accessibility, public realm, new homes and jobs.</p> <p>As mentioned in TfL CD’s previous response TfL own the freehold of both Fulwell Bus Garage and the LIDL site, and look to engage with the bus operator (RATP) and the GLA about the opportunity for a comprehensive redevelopment of the wider site. A site allocation would help to facilitate a comprehensive scheme for the wider site. Please see appendix 2 for a map of TfL landholdings at Fulwell.</p> <p>[The map was not enclosed, but maps were provided previously to the Call for Sites and are published in the Schedule of Call for Sites all responses received – Appendices (pages 4 and 5)]</p> <p>[See comment 534 in relation to Site Allocation 15: Station Yard, Twickenham]</p>	Noted. Add Fulwell Bus Garage as a Site Allocation. This reflects that the site is of mixed ownership, and recognises the opportunities for a comprehensive development if it comes forward.
-		Policy 1. Living Locally and the 20-minute neighbourhood (Strategic Policy)		
267	Tim Catchpole, Mortlake with East Sheen Society	Policy 1. Living Locally and the 20-minute neighbourhood (Strategic Policy)	We agree with this logic.	Support noted.
268	Heather Mathew, Richmond Council for Voluntary Service (CVS)	3 suggested key areas for inclusion - 1) Understanding and representing the value and contribution that the voluntary sector make to the achievement of the ambition of this plan and using the leverage that the planning has on development to support investment in community assets both capital and operational	<p>1) Understanding and representing the value and contribution that the voluntary sector make to the achievement of the ambition of this plan and using the leverage that the planning has on development to support investment in community assets both capital and operational</p> <p>The borough has a long history of an active and supportive voluntary and community sector (VCS) that enables and promotes health and well- being outcomes across the age ranges. A large number of voluntary sector organisations also own or lease community buildings in the localities from which they deliver their services. It is a significant employer, and this is an area of expected growth particularly in relation to health and social care roles. Its ability to mobilise and adapt to meet the needs of the local community were further highlighted by the pandemic, and the council relied heavily on health and social care organisations and the community centres and neighbourhood care groups network to reach the most vulnerable and provide essential services via trained and vetted volunteers. The VCS provide early intervention and an ongoing level of support in the community that acts as a buffer for both health, community and social care services and more broadly sports, leisure, and cultural venues and activities, that is increasingly being recognised as social capital with an associated value which should be considered when developing plans for investment.</p> <p>The vision statement The role of the development plan “ is to inform investment in social and physical infrastructure”, and to provide “a clear picture of the role that development should play in creating sustainable growth” The pandemic has further intensified the financial pressures on the voluntary sector, and there is a significant challenge relating to affordable accommodation, and the repair and maintenance costs on existing buildings they occupy. Within the concept of the 20-minute neighbourhoods the plan refers to a range of intended outcomes including</p> <p>“create environments that enable active resilient and inclusive communities – place based connections that put people first”</p> <p>“Key meeting places where social interaction and a sense of community is fostered”</p> <p>“support the borough’s diverse arts and culture offer recognising their importance to enriching local community”</p> <p>“Protect and enhance the boroughs multifunctional green and blue infrastructure”</p> <p>“recognise the importance of health as a cross-cutting priority”</p> <p>Voluntary and Community Sector organisations provide services and hubs that support all these outcomes and many more across the social spectrum, and yet the vision statement at 3.2 relating to the 20 minute neighbourhood makes no direct reference to the role of the voluntary sector in enabling that vision nor does the plan reflect the support and investment that the VCS needs, alongside businesses, to be sustainable and promote growth. At pg 21 we suggest adding the following bullet point</p> <p>“ All development should “</p> <ul style="list-style-type: none"> • Demonstrate their understanding and awareness of the VCS provision locally and how investment in existing community buildings, spaces and infrastructure will support the living locally concept. <p>[See also comment 282 in relation to Area profiles and community mapping]</p>	Noted, and the importance of the voluntary and community sector in the 20 minute neighbourhood. However, it is felt that a direct reference to VCS provision and asking applicants to demonstrate how investment in existing community buildings, spaces and infrastructure will support Living Locally may be onerous, with difficulty in mapping and updating the existing sector. This is particularly in light of flexible uses of spaces, including through Class E, which may or may not require permission. References to the importance of the sector have been added where relevant in other parts of the Plan, including in the delivery and implementation section.
269	Hannah Blunstone, CBRE on behalf of Rugby Football Union (RFU)	Policy 1 - 'Living Locally'	The Plan vision references the outcome of the 'living locally' concept: by 2039 everything a local resident needs can be reached within 20 minutes by foot or bike.	Support for the Policy is noted. It is not considered appropriate or necessary to exempt a specific site from the policy. Requirements of Criteria C are not onerous to demonstrate in a way that would satisfy the requirements of the policy and the

			<p>The RFU support the living locally approach for access to essential services to fulfill daily needs, as well as improving sustainable modes of transport and access to the stadium. However, the vision and the corresponding policy (Policy 1) as currently drafted applies to 'all development, except householder applications' and needs to clarify exclusions for Twickenham Stadium as an internationally significant sporting and entertainment venue.</p> <p>To address this, we would suggest that Policy 1 (Part C) be redrafted as follows: <i>"C. All development (except householder applications for alterations and Twickenham Stadium and its linked uses as a sporting and entertainment venue) should:</i></p> <ol style="list-style-type: none"> <i>1. demonstrate how they will deliver improvements that support the 'living locally' concept;</i> <i>2. be permeable by foot and cycle, with good connections and signage to local walking and cycling routes/networks as well as public transport;</i> <i>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;</i> <i>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;</i> <i>5. demonstrate how a proposal will reduce the dominance of vehicles.</i> <p><i>Major developments of 10 or more residential units or non-residential development of 500sqm of floorspace or more:</i> <i>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".</i></p> <p>The need to retain sufficient parking, particularly for coaches, servicing facilities and space for spectators and related services is recognised in the site allocation. The above change would remove any conflict between this and Draft Policy 1.</p> <p>As noted in the supporting text to Draft Policy 1, one of the underlying aims of the 'living locally' concept in Richmond borough is to reduce urban carbon emissions and biodiversity loss. We consider the proposed exclusion from this policy is acceptable, as any development on the Twickenham Stadium site would still be required to meet relevant London Plan and Local Plan policies promoting sustainable transport, healthy streets and measures to improve biodiversity and air quality (e.g. London Plan policies T1, T2, T3, T4, T6.4, S11 and LBRuT Draft Local Plan Policy 3, 23, 48 and 53).</p>	<p>needs of the stadium. As acknowledged in the representation, applicants are expected to demonstrate compliance with policies regarding transport, biodiversity, healthy streets, air quality and other such measures. This policy would only require consideration in the supporting planning documents how this compliance is in support of the Living Locally concept. Add additional supporting text detailing the expectations for how applications will demonstrate compliance with the policy.</p>
270	Alice Roberts, CPRE London	Policy 1 - Living Locally and the 20-minute neighbourhood	<p>20 minute neighbourhood concept, as defined, does not incentivise local living / less car-use. The borough appears to define 20 min neighbourhoods as twenty minutes one way on foot or cycle -- when the appropriate definition (appropriate to encouraging local life and active travel in order to reduce car trips etc), defines it as 10 mins on the outward leg and 10 mins back by foot only.</p> <ul style="list-style-type: none"> • This should be re-defined as meaning 10 minutes walk to and 10 minutes walk from • More is needed to set out what services are needed and what new hubs need to be set up to create genuine twenty-minute neighbourhoods. • More is needed on how to link walking / cycling to the rail/tube network i.e. secure cycle storage by all stations. 	<p>Add reference in the supporting text to how the 800m relates to the borough, but this is not measured as an absolute geography, and there are no fixed zones or boundaries.</p>
271	Martin Ellis, South West London Clinical Commissioning Group (CCG)	Policy 1. Living Locally and the 20-minute neighbourhood (Strategic Policy)	<p>We support Policy 1. Living Locally and the 20-minute neighbourhood which will enable healthier lifestyles. One of the adjustments needed to respond to Covid-19 and climate change is to enable people to 'live locally' and a renewed focus on high streets and local centres as destinations.</p> <p>We would welcome the opportunity to discuss what the 20-minute neighbourhood concept means for healthcare services and models of care – see also Policy 49 clause B 4.</p> <p>It is recognised that the NHS has a role in supporting the regeneration of town centres. The Health on the High Street report (NHS Confederation, December 2020) outlines the opportunities for the NHS to become directly involved in the high street policy agenda which could include running health services from vacant property, including vaccination programmes, broadening the range of services provided within communities and supporting and participating in the design of healthy communities and places.</p>	<p>Support noted.</p>
272	Catherine Rostron	Map 4.1 200, 400, and 800 metre buffers around centre boundaries in the borough. Paragraph 4.11	<p>This looks impressive but in reality it needs to include analysis of the facilities provided too. Using the example of my local area around Kew Gardens station, it does have a thriving local parade but because it is a tourist hot spot this is heavily weighted towards coffee shops. In determining whether to '20 minute neighbourhood' is achieved the range and quality of the facilities needs to be included.</p>	<p>The policy has been altered that recognises a need for a mix of uses and this will be supported. However, please note that following changes to the Use Classes Order legislation, many commercial uses have been amalgamated into a general Class E. Changes of permitted uses within this class can occur without planning permission and therefore are not subject to planning control. An overconcentration of uses within Class E may not be avoidable through planning policy.</p>
273	Michelle Eden	General comment in relation to cycle infrastructure, Paragraph 4.12	<p>This is a general comment relating to cycle infrastructure across all boroughs. We need safe and secure storage to prevent theft of bicycles in all shopping areas not just bike shelters or a rack. CCTV will not prevent your bike being stolen either. Could the council consider subsidised bike lockers perhaps or a council run bike valet/repair service. I would be prepared to pay for my bike to be safely stored, whilst I shop. I would love to be able to cycle more locally but not having secure bike storage is not encouraging me to get out of my car, along with not feeling safe on the road at the moment. There is often empty shops in Kingston upon Thames and Richmond that would be suitable for this type of valet cycle hub/repair/hire service.</p>	<p>The Local Implementation Plan sets out how crime and fear of crime can be addressed, such as through assessment of lighting levels through parks and other open spaces. Policy 48 refers to the London Cycle Design Standards to deliver cycle parking that is secure and well-located. Points about subsidising provision/services have been noted and passed on to relevant teams within the Council. Unfortunately, the proposals go beyond the scope of the Plan.</p>
-		Policy 2. Spatial Strategy: Managing change in the borough (Strategic Policy)		
274	Tim Catchpole, Mortlake with East Sheen Society	Policy 2. Spatial Strategy: Managing change in the borough (Strategic Policy)	<p>We agree with the logic but note that it then leads into the spatial strategies for the nine distinct areas of the Borough and we wonder, as mentioned above, why these should appear upfront and not at the end of the document.</p>	<p>It is considered that it is logical for the spatial strategy to be followed by the place-based strategies interspersed with the relevant site allocations. In any plan order there will always be policies that have to be at the end; it is more important that the structure flows and it is easy for a user to navigate around the document.</p>

275	Hannah Gray, Avison Young on behalf of National Grid	Policy 2. Spatial Strategy: Managing change in the borough (Strategic Policy) - Utilities Design Guidance	The increasing pressure for development is leading to more development sites being brought forward through the planning process on land that is crossed by National Grid infrastructure. National Grid advocates the high standards of design and sustainable development forms promoted through national planning policy and understands that contemporary planning and urban design agenda require a creative approach to new development around high voltage overhead lines, underground gas transmission pipelines, and other National Grid assets. Therefore, to ensure that Spatial Strategy Policy 2 is consistent with national policy we would request the inclusion of a policy strand such as: <i>"E. Proposals will take a comprehensive and co-ordinated approach to development including respecting existing site constraints including utilities situated within sites."</i>	Noted. The Council supports the provision of utility infrastructure, and ensuring this is of high design and sustainability standards. However, Policy 2 is seeking to convey the overall spatial strategy and not deal with detailed aspects dealt with elsewhere in the Plan.
276	George Goodby, Environment Agency	Policy 2. Spatial Strategy: Managing change in the borough (Strategic Policy) – General comments in relation to biodiversity overview	Under Section 6(1) of the Environment Act (1995) the Environment Agency has a duty to promote the conservation and enhancements of habitats and species dependent on aquatic environments. The quality of our water environment and the diversity, connectedness and resilience of aquatic species and habitats are intrinsically linked. The protection and enhancement of such habitats will be vital to achieving the requirement of the Water Framework Directive (WFD) to "good" ecological status in all WFD waterbodies by 2027. We are pleased to see that it is a strategic aim of the plan (Policy 2) to ensure that growth is delivered in a sustainable way, whilst tackling the climate emergency and biodiversity crisis. Climate change is one of the main drivers for biodiversity loss, and the destruction of ecosystems undermines nature's ability to regulate greenhouse gases.	Noted.
277	Martin Ellis, South West London Clinical Commissioning Group (CCG)	Policy 2. Spatial Strategy: Managing change in the borough	The Local Plan aims to meet the needs of local communities and businesses through the provision of housing, employment, schools, community services, social infrastructure, leisure and other local services, in a sustainable way. We suggest that reference is made to the Infrastructure Delivery Plan to ensure that growth is delivered with sufficient supporting infrastructure.	Noted.
278	Peter Willan and Paul Velluet, Old Deer Park Working Group	General comment (in relation to sustainable growth)	Sustainable Growth. We responded to the Direction of Travel Consultation in 2020, wherein we questioned the need and advisability of replacing the Local Plan 2018 so soon. One of the four reasons then given by the Council was population growth but according to the Retail and Leisure Needs Study (2021), Richmond Borough population of 199,630 in 2021 is estimated to grow by only 2.8% to 205,200 in 2039. The estimate for Richmond Town and surrounding area (Zone 1) is for a decrease in population from 23,031 in 2021 to 22,536 in 2039. The absence of population growth feeds through into housing and into, retail, food/beverage and leisure uses and employment, housing, etc. in Richmond Town, so the estimates are important for the Local Plan. We comment on the Uses of Richmond Town in reference to Policy 18 . In view of the very limited estimated growth in population in Richmond Borough and a small decrease in Richmond Town and surrounding area (Zone 1) we believe it is important to emphasise "Improvement" as well as Growth. While population numbers may not grow there will be elements of the Local Plan where there is growth and elements where there is decline. Even without population growth, it is to be expected that there will be increasing prosperity and increasing disposable income and therefore growth in the uses of Richmond Town.	Update the supporting text in section 2 setting out the Strategic Context and Trends to refer to the 2021 census and latest projections. There has been weaker population growth than the ONS had been predicting, but almost three quarters of population growth has been accounted for by those aged 65 and over. The latest GLA projections (2020-based) estimate much lower population growth, to reach 196,714 (identified capacity scenario), a 0.3% change by 2039. However, there remains uncertainty, with the GLA suggesting there could be stronger migration and a rebound from the pandemic. It is clear that population change remains a significant challenge, with a projected change in the age structure of those aged 65+ to increase by 50% by 2039. It is not considered necessary to look at a lower geographical scale for population change, because for example the spending in Zone 1 is not drawn just from the residents of Zone 1.
279	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	General comment (in relation to sustainable growth)	Sustainable Growth. We responded to the Direction of Travel Consultation in 2020, wherein we questioned the need and advisability of replacing the Local Plan 2018 so soon. One of the four reasons then given by the Council was population growth but according to the Retail and Leisure Needs Study (2021), Richmond Borough population of 199,630 in 2021 is estimated to grow by only 2.8% to 205,200 in 2039. The estimate for Richmond Town and surrounding area (Zone 1) is for a decrease in population from 23,031 in 2021 to 22,536 in 2039. The absence of population growth feeds through into housing and into, retail, food/beverage and leisure uses and employment, housing, etc. in Richmond Town, so the estimates are important for the Local Plan. We comment on the Uses of Richmond Town in reference to Policy 18 . [see comment 805 in relation to Policy 18] In view of the very limited estimated growth in population in Richmond Borough and a small decrease in Richmond Town and surrounding area (Zone 1) we believe it is important to emphasise "Improvement" as well as Growth. While population numbers may not grow there will be elements of the Local Plan where there is growth and elements where there is decline. Even without population growth, it is to be expected that there will be increasing prosperity and increasing disposable income and therefore growth in the uses of Richmond Town.	See response to comment 278.
-		Places		
280	Vicky Phillips, Habitats & Heritage	Site Allocations	We support the need to provide new open space in all new developments expressed in many of the site allocation proposals.	Support noted.
281	Martin Ellis, South West London Clinical Commissioning Group (CCG)	Places and Site Allocations	The borough has been divided into nine high-level 'places'. Key sites as site allocations are identified in each place. Many of the site allocations have been rolled forward from the adopted Local Plan and the Twickenham Area Action Plan. The CCG has responded to individual masterplans and planning applications for some of these key sites.	Noted.
282	Heather Mathew, Richmond Council for Voluntary Service (CVS)	3 suggested key areas for inclusion - 1) Understanding and representing the value and contribution that the voluntary sector make to the achievement of the ambition of this plan and using the leverage that the planning has on development to support investment in community assets both capital and operational	Area profiles and community mapping The first systematic mention of the voluntary and community sector is at page 295 (of 341) where it is acknowledged that "social and community infrastructure facilities provide for the health and welfare, social educational, spiritual, recreational leisure and cultural needs of the community... and contributes to the creation of lifetime neighbourhoods ie places where people are able to live and work in safe and healthy and supportive and inclusive environments with which they are proud to identify" However it is notable that the area profiles, beyond reference to Kew Gardens and Hampton Court, do not identify any of the community and voluntary sector infrastructure that contribute to the health, well-being and sense of place of that area, nor is there a mapping of the community assets that provide community centres and spaces despite the expectation that the local plan "should take local circumstances into account to reflect the character, needs and opportunity of the borough" (4.14) The same is true of demographic and economic profile- most of the information provided in the area profiles is heavily weighted to perpetuating the idea that Richmond is a leafy green borough with the majority of residents employed in highly skilled	Across the Plan, a number of references to the contribution of the community and voluntary sector have been added - in the introduction, to the strategic objectives, to the policy on protecting the local economy, and new details added to the section on Delivery & Monitoring has been expanded to address implementation of the Plan. See also responses to comments 826 and 904. The updated Infrastructure Delivery Plan looks at assets and the future needs of providers. There is emphasis in the Plan on delivery through the private sector, other agencies and bodies, and parts of the public sector, as well as the community and voluntary sector, recognising the limitations of the Council's role.

			<p>professional jobs, and with limited economic challenges. However, we know this is not the case, and the pandemic has created a level of instability in socio economic groups not previously seen in services. The pressures on unpaid carers has become much more visible, and the needs of children with Special Educational Needs and their families, particularly in relation to transition into adulthood, including employment and housing are clearly expressed in the SEND Futures Plan https://kr.afcinfo.org.uk/pages/local-offer/information-and-advice/send-consultation-hub-and-resource-bank/send-futures-richmond</p> <p>For there to be a joined-up approach and create opportunities to “improve connectivity and accessibility for all” (page 18) it is essential that developers and town planners from the outset have an accurate and balanced profile of each area which maps the community assets, highlights the demographic and particular age profiles that may be relevant, and is clear in its expectations relating to investment and improvement of the existing infrastructure. Barnes is used as an example below, but in every profile, there are community assets and infrastructure needs that could be highlighted that would inform planning considerations from the outset.</p> <p>14. Area Profile – Barnes Describes Castelnuau “with its fine houses” completely ignores that is an area of relative deprivation with extreme affluence neighbouring poor. The Barnes Fund produced a piece of community research last year which highlights the challenges residents face, and their experience of living there. They feel isolated – limited public transport, no affordable shops within walking distance, the ongoing situation with Hammersmith Bridge, lack of services delivered locally. They value community provision such as Castelnuau Community Centre, and the Barnes Community Association and highlight the work that OSO Arts Centre did during the pandemic producing and delivering cooked food to those in need across the community. A mixed community of long-term residents and migrant workers, lack of qualifications, many in low paid and unstable work; significant issues with mental health and access to health services. https://thebarnesfund.org.uk/need-in-barnes/</p> <p>Social Value The London Sustainable Development Commission report “How social value can help build back better. A Covid and post Covid approach” (2021) highlights the tangible benefits for local communities of a social value approach, using public bodies’ purchasing power and decision making to increase the benefit to the community by requiring actions and activity that will contribute to growth, employment, resilience and environmental sustainability. These benefits include</p> <ul style="list-style-type: none"> • Higher levels of investment in community assets • Inclusion • Improvements to local places, economies and community well being • Avoidance of displacement or community isolation It is essential that the local plan, in recognising the value and contribution of VCS services, and the challenges they face in terms of accommodation and operational delivery, sets out clearly how the leverage that planning allows for can support and strengthen both investment and connectivity across the voluntary and community network. 	<p>See also response to comment 1079 in respect of mapping and the condition of assets. See also response to comment 227 and a reference to carers added in the strategic context.</p> <p>The details in the place-based strategies draw from the Urban Design Study and there is a limit to the detail in a boroughwide plan as well as resources to detail this and it’s use in determining planning applications. In respect of the example for Barnes, reference to community isolation and deprivation has been added to the vision for the place-based strategy.</p>
283	Heather Mathew, Richmond Council for Voluntary Service (CVS)	3 suggested key areas for inclusion - 3) Community Voice	<p>3) Community Voice A social value approach helps “ identify what’s important to communities now, and why, and the likely impact of changes made to their neighbourhoods” and supports innovative approaches to community co-design of neighbourhoods to enable inclusive place making” (London Sustainable Development Commission) The Mayor of London’s missions for London recovery invites us “ to rethink the way we live and move around the city (4.5 Pg 22) and includes a clear intent “ to work with London’s diverse communities to establish new exciting and experimental uses across London high streets” (4.3 Pg 22) Asset Based Community Development (ABCD) is an approach to sustainable community driven development which would lend itself to the development of the 20-minute neighbourhood. ABCD builds on the assets that are found in the community and mobilizes individuals, associations, and institutions to come together and to realise and develop their strengths (Asset Based Community Development for Local Authorities published by Nesta September 2020 https://www.nesta.org.uk/report/asset-based-community-development-local-authorities/) The Richmond Development Plan currently gives little indication how the community voice will be invited, heard and involved in planning and ongoing community development and there are no suggested measures in the monitoring that will capture social impact of the 20-minute neighbourhoods, the difference it is making in terms of quality of life and the experience of living in Richmond. (pg 319) The plan places great importance, particularly in relation to the green and blue infrastructure, on community education and community stewardship and many of the targets relating to achieving the climate emergency goals rely on engaging residents in conversations that alter behaviours and bring about sustainable change. The plan would benefit from a clear set of expectations in relation to the community voice, engaging with and involving the seldom heard, and encouraging the involvement of young people in neighbourhood development.</p>	<p>Supporting text to Policy 44 on community engagement expanded to clarify expectations around meaningful engagement. This adds reference to the ‘Raising the Bar’ guidance, which is being brought forward by the Council, to aid developers with their consultation.</p>
284	Katie Parsons, Historic England	Site Allocations (general)	<p>We have provided comments on certain sites below and we can continue to provide more detail as and when development capacities are assigned to these sites. All of the allocated sites are all developable in principle, it is just a matter of to what extent relative to where the sensitivities lie. It is important that a design-led approach is taken when allocating development capacity to ensure it can be accommodated within a site while avoiding harm to the historic environment in the first instance, or with appropriate mitigation set out in the allocation policies. As advised on the first page of this advice, the allocations could include more detail to reflect the findings of the Urban Design Study. It is also important to ensure that all heritage assets, both designated and non-designated, are identified in allocation policies where relevant. Reference should be made to the need to conserve or enhance such assets and their setting. Throughout all of the allocation policies better reference should be made to archaeology. Many of allocation policies are silent on archaeological issues, how they should be managed, and what information might need to be submitted.</p>	<p>Noted. The Plan emphasises a design- and character-led approach and it is considered development capacity should be ascertained through that detailed process, at preapp and application stages.</p> <p>The Site Allocations have been reformatted and now list the relevant site constraints, including Heritage assets, views, and where sites are within an Archaeological Priority Area.</p> <p>See also response to comment 200.</p>

			<p>The sites listed below will need more intervention and advice from the Greater London Archaeological Advice Service¹ (GLAAS). None of them are potentially significant enough to prevent development or warrant removal from the site allocations list but Desk Based Assessments will be required to inform site capacity, mitigation, and design. These are:</p> <ul style="list-style-type: none"> - 10 St Mary's University, Strawberry Hill - 18 Twickenham Riverside - 20 Kneller Hall - 22 Ham Close - 22 Cassell Hospital - 27 American University, Queens Road - 34 Stag Brewery <p>¹ https://historicengland.org.uk/services-skills/our-planning-services/greater-london-archaeology-advisory-service/</p>	
-		Place-based Strategy for Hampton & Hampton Hill		
285	Theresa Oddelm, The Royal Parks	Place-based Strategy for Hampton & Hampton Hill – comments specific to biodiversity and the Royal Parks' Environmental Designations	<p>Policy (p35) This should include reference to the <u>protection</u> of open space (as well as 'increasing and improving') given the risk to open space associated with increased recreational pressure</p>	Add reference to protect open space in the place-based policy, and reference to the recreational pressures into the area profile for Hampton & Hampton Hill (reflecting that this is already acknowledged elsewhere in the draft Plan).
286	Matthew Bolton	Place Based Strategy for Hampton & Hampton Hill	<p>Under place based strategy 6: Hampton, Hanworth Homebase should be added as a potential mixed use residential/ commercial intensification site allocation. This is a retail park site with a large proportion of the site as surface level car parking. As seen elsewhere in the borough (Richmond Homebase) and in neighbouring boroughs (Kingston Homebase and Syon Lane Homebase) there is a clear desire by the landowner of these sites to convert their use to residential.</p> <p>The Local Plan makes no reference to the potential redevelopment of Hanworth Homebase for a residential scheme with affordable housing. The London Plan and Local Plan notes that retail uses should be housed within town centres. This site as an out of town 'big box' retail unit does not add to the vitality of the town centre. It encourages car usage through ample free parking and is located in an unsustainable location further promoting car use. Perhaps the site could be allocated for a mixed use residential scheme with a blend of retail on the ground floor and residential flats above.</p> <p>Also the Molesey Telephone Exchange in Hampton is not allocated as a site. Elsewhere across the borough, the place-based strategies often contain telephone exchanges that may be disposed. This site should also be included.</p> <p>Changes consider necessary: I consider the two above sites should be added to the allocations for the reasons set out above. There is a precedent of similar sites in the borough being included as site allocations yet these have been overlooked in Hampton. Therefore it would add consistency to the councils approach, provide further opportunity for affordable housing on brownfield land. In the case of Homebase, there is evidence within the borough of residential-led development coming forward in the next three years.</p>	<p>Agreed that these additional sites are similar in type to other allocations and should be included in the Local Plan, as they may be brought forward by the landowners.</p> <p>The Homebase, Hampton Site Allocation is added to the place-based strategy for Twickenham, Strawberry Hill & St Margarets (as it falls within the Urban Design Study character area C7 Fulwell and West Twickenham Residential).</p> <p>The Molesey Telephone Exchange Site Allocation is added to the place-based strategy for Hampton & Hampton Hill.</p>
287	Jon Rowles	6. Hampton & Hampton Hill	<p>The acute shortage of school places is not being addressed and many families who live in Hampton cannot get into local schools and have to send their children to schools far away such as those based in Whitton which can take up to 40 minutes in the morning to reach by bus. Whilst the majority may go by bus, statistics show that around 13% will be making these journeys by car. Therefore, a key element of living locally - local schools - is not being addressed by the council.</p> <p>To meet the demand of school places in the same neighbourhood it looks like the council will need to identify a site for a new secondary school in Hampton near the River Thames and see how existing schools can increase their PANs.</p> <p>Hampton Nurserylands has high levels of social need and the local plan so far hasn't really acknowledged this or put in place a meaningful policy to help these people improve their quality of life.</p>	<p>The School Place Planning Strategy is regularly reviewed, with an update to the Council's Education and Children's Committee expected in 2023. Achieving for Children are aware of the situation in Hampton which has been discussed at the Schools Forum in June 2022, however they are working with schools as these are issues of choice and diversity, rather than sufficiency of places, as in the short to medium term there are enough secondary school places in the west of the borough. The impact of new development on existing infrastructure can be assessed as set out in Policy 49 Part F and therefore it is not considered necessary to refer to this in the place-based strategy for Hampton & Hampton Hill.</p> <p>Paragraphs 4.11 and 4.12 mention the pockets of deprivation including around Hampton Nursery Lands, in reference to how the 'Living Locally' concept will be used along with interventions outside of planning to target these areas for improvement.</p>
-		Site Allocation 1: Hampton Square, Hampton		
288	Richard Carr, Transport for London (TfL)	Site Allocation 1: Hampton Square Hampton	<p>The requirement to retain adequate car parking to meet the needs of the community centre and new uses should be modified by stating that car parking should be minimised as part of any redevelopment, consistent with stated objectives to reduce car dominance and should not exceed maximum parking standards.</p>	<p>Added clarification that car-parking provision should be to London Plan standards. Given the very low PTAL, it is not considered reasonable to insist that car parking is minimised, though stating that it should be to London Plan standards would mean that provision would not exceed maximum standards. There is no CPZ in the area and so development is expected to minimise risk of adverse overspill parking on neighbouring streets to the detriment of highways safety. There is also reference to the need to include pedestrian routes where possible and encourage active travel. It is therefore considered that the Site Allocation strikes the right balance between adequate car parking provision, encouraging active travel and highways safety.</p>
289	Andrew Whitehead	Site Allocation 1: Hampton Square, Hampton	<p>I strongly disagree with content in section 6, "Place-based Strategy for Hampton & Hampton Hill" and specifically its sub-section "Allocation 1: Hampton Square, Hampton".</p> <p>The relevant Site Proposal is understandably general in nature: "Partial re-development and improvement for community, retail and local services, employment and residential uses, including affordable units and car parking."</p>	<p>The green open space forming part of the south of the site is part of a wider parcel designated as Public Open Space and OOLTI, and includes Nursery Green playground. The Council's ambitions have been for partial redevelopment and improvement, and any re-provision of existing Public Open Space and OOLTI would</p>

			<p>This proposal contains an implicit threat to build on the part of the Hampton Square Allocation that's designated as an Other Open Land of Townscape Importance (OOLTI), because building on open green parkland would be cheaper than any alternative. The classification of the OOLTI, of which the Hampton Square Allocation forms the northern part, is documented within the "Other Open Land of Townscape Importance Review", which was carried out by Arup, dated 31/08/2021, and forms page ARUP5. The title of the assessment is "Corner Old Farm Road and The Avenue".</p> <p>This Arup assessment notes that the land in question is a "large green open space with playground", and concludes with a score that's "High against Criteria 1, 2, 3 and 4 and therefore meets criteria strongly."</p> <p>Does it matter if a high-scoring OOLTI is nibbled away? Yes it does. To scores of small children who enjoy the playground daily, and to everybody who appreciates the green lungs it provides between the playground and the houses to its north. This includes all the dog-walkers and residents walking daily to and from the playground and Hampton Square on the footpath that runs through the OOLTI area.</p> <p>The OOLTI should be entirely excluded from any threat of building over in the Site Proposal; it's the only way to prevent developers from building on park land, because brownfield development would be costlier and require more thought than simply concreting over a green space.</p> <p>Changes considered necessary: The Site Proposal should exclude the overlapping area of Hampton Square Allocation with the OOLTI from potential re-development. Either by modified the Proposal's wording, or by redrawing the map of the Hampton Square allocation so there is no overlap with the OOLTI.</p>	<p>need to be considered against Policies 36 and 37, in particular paragraph 21.25 in the Regulation 18 Draft Plan recognises re-distribution of OOLTI as part of a comprehensive redevelopment may be acceptable provided the new open area is equivalent or improved in terms of quantum, quality and openness of OOLTI. The Open Land Review 2021 found the parcel (Site 5: Corner Old Farm Road and The Avenue performed strongly against OOLTI designation criteria. It is considered appropriate to remove this area from the Site Allocation. The Site Allocation makes clear that any redevelopment should make sure that it establishes a positive relationship with the adjoining green space/OOLTI.</p>
-	Gary Rhoades-Brown	Site Allocation 1: Hampton Square, Hampton	[See comment 926 in relation to Hampton Square proposals]	<p>See response to comment 288 with regards to car parking standards. Given the Council's overall strategic aim of reducing car dependency, it would not be appropriate to request a level of on-site parking which exceeds the maximum standards set out in the London Plan, which in any case are considered likely to be sufficient. The Site Allocation makes clear that adequate parking for the community uses will need to be retained.</p>
-		Site Allocation 2: Platts Eyot, Hampton		
290	Kevin Scott, Solve Planning Limited on behalf of Port Hampton Estates Limited	Site Allocation 2: Platt's Eyot, Hampton	<p>This relates to the specific allocation of Platt's Eyot and reflects the existing adopted policy. We are not seeking further revisions to the Site Proposal as we consider it to be a positive framework for regeneration on the island.</p> <p>The supporting context section to this policy recognises the impact of the fire in May 2021 and states: <i>'In May 2021 there was a large fire which destroyed several buildings on the island and caused further deterioration of the Conservation Area. The Council is seeking reinstatement of the listed buildings as they were before the fire'</i></p> <p>The owners are working with the Council on proposals which will involve the reinstatement of the listed buildings. However, we would suggest that a requirement to reinstate the listed buildings as they were before the fire could be reworded. The buildings were in need of repair and refurbishment prior to the fire. We would suggest the following amendment: <i>'In May 2021 there was a large fire which destroyed several buildings on the island and caused further deterioration of the Conservation Area. The Council is seeking reinstatement of the listed buildings through an appropriate scheme of restoration.'</i></p>	<p>Reference to restoration of listed buildings to pre-fire standard has been removed and reference made to their 'appropriate restoration'. This amendment is not considered to water down the aims of the site allocation, which is the restoration of listed buildings and the enhancement of the conservation area. Judgement as to whether an application's restoration proposals adequately meet the above aims would ultimately rest with the local planning authority, subject to internal heritage colleagues' comments, at planning stage.</p>
291	George Goodby, Environment Agency	Site Allocation 2: Platts Eyot, Hampton & Hampton Hill	<p>The local plan describes potential residential use to assist with viability for regeneration of listed buildings following fires in 2021. The sequential test report dated December 2021 describes this site as less vulnerable. We assume therefore that the allocation will be less vulnerable and any more vulnerable development that may come forward in future will not be subject to the allocation and will be windfall subject to applying relevant sequential and exception tests. If the allocation is to include some minor residential use then the sequential testing should be updated to reflect this.</p> <p>Recommended action: clarify whether the sequential test has included the 'more vulnerable' residential use or whether it needs to be re-assessed for this use.</p> <p>The Sequential test report states that 20.3% of the island is shown to be within the 5% flood designated as functional floodplain. Any new development whether less or more vulnerable should be assigned to undeveloped land outside of this zone or contained within existing built footprint (developed footprint) shown to be within 5% flood. We recommend that you make this clear within the site allocation. For example, you could add to the fifth context bullet point 'They should not prejudice the continued operation of existing river-dependent and river-related uses and must comply with relevant flood risk policy'.</p> <p>Recommended action: We recommend you reiterate that any development must comply with flood risk policy.</p> <p>Bullet points 6 and 7 propose limited vehicle access to Platts Eyot Island. Any access arrangements must not result in a loss of riparian habitat or flood storage, or a loss in the ability to maintain flood defence assets. This should be added to bullet point 7 for clarity.</p> <p>The wording could read 'The Council will work closely with the Environment Agency to understand the issues relating to the provision of safe access / egress to and from the island, including ensuring flood defence maintenance access is maintained or improved, and to ensure there is no net loss of riparian habitat or flood storage'.</p> <p>Recommended action: We recommend you update context bullet point seven to clarify that access and egress works must not impact flood defence maintenance access or result in a loss of riparian habitat or flood storage.</p> <p>[See also comment 732 on paragraph 16.63]</p>	<p>An updated Flood Risk and Development Sequential Test accompanies the Regulation 19 Plan.</p> <p>The amended Site Allocation format states the flood constraints for the site. Flood risk / SuDS matters are covered in Policy 8 'Flood Risk and Sustainable Drainage' of this Plan and any future application would be expected to comply with this policy, national policy and guidance and the Council's Strategic Flood Risk Assessment (SFRA0)2021. The current wording is therefore considered to be sufficient.</p> <p>The Site Allocation states that access and egress from the island would need to be to the EA's satisfaction, and notes the flood constraints. The EA would be a statutory consultee for any future development proposal, and the applicant would be expected to demonstrate that any concerns raised are addressed. It is therefore considered that the current wording is sufficient.</p>
292	Suzanne Parkes, Elmbridge Borough Council	Site Allocation 2: Platts Eyot, Hampton - River Thames development	<p>The boundary between Richmond and Elmbridge is separated by the River Thames. In the consultation document, Chapter 6 'Place-based Strategy for Hampton & Hampton Hill', there are proposals for several site allocations along our shared boundary.</p>	<p>See response to comment 291 with regards to the need to comply with relevant national and local policy and guidance regarding flood risk and mitigation.</p>

			Site allocation 2, 'Platts Eyot', is an island on the River Thames proposed for regeneration for new businesses and industrial uses including residential development, should it complement and enhance the island. In EBC's Strategic Flood Risk Assessment Level 1 (2019) property areas in Elmbridge are outlined around Platts Eyot as Flood Warning Areas. Therefore, caution should be given to any intensification which could otherwise increase flood risk and impact flow routes of the functional floodplain. There is no capacity details or clear timescales for delivery / implementation which requires clarification.	The Site Allocation acknowledges that some residential development may be needed to support the restoration of the listed buildings, but that this should be limited to the minimum necessary to achieve viability. It is therefore not appropriate for the Council to be further prescriptive, as the site's capacity for development is dependent on viability, as well as an assessment made at planning stage on the heritage impacts.
-		Site Allocation 3: Hampton Traffic Unit, 60-68 Station Road, Hampton		
293	David Wilson, Thames Water	Hampton Traffic Unit, 60-68 Station Road, Hampton	<p>Thames Water Site ID: 62517</p> <p>Water Response On the information available to date we do not envisage infrastructure concerns regarding water supply network infrastructure in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ</p> <p>Waste Response On the information available to date we do not envisage infrastructure concerns regarding wastewater network or wastewater treatment infrastructure capability in relation to this site/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ</p> <p>Additional Comments As this is a brownfield site, there may be public sewers crossing or close to the development. If you discover a sewer, it's important that you minimize the risk of damage. We'll need to check that the development doesn't limit repair or maintenance activities, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes. https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes.</p> <p>The proposed development is located within 15 metres of a strategic sewer. Thames Water requests the following condition to be added to any planning permission. "No piling shall take place until a PILING METHOD STATEMENT (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement." Reason: The proposed works will be in close proximity to underground sewerage utility infrastructure. Piling has the potential to significantly impact / cause failure of local underground sewerage utility infrastructure. Please read our guide 'working near our assets' to ensure your workings will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures. https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes.</p>	The Site Allocations format has been amended to include a description of the site/wider area and relevant constraints, to include identification of the flooding constraints for each site. Flood risk / SuDS matters are covered in Policy 8 'Flood Risk and Sustainable Drainage' of this Plan and it is therefore not considered necessary to set out the requirements of developers for this in the Site Allocations.
294	Vicky Phillips, Habitats & Heritage	Site Allocation 3: Hampton Traffic Unit, 60-68 Station Road, Hampton p40	We support a link through to the Beveree site and would seek a contribution to improving the management, maintenance and biodiversity of this site which is currently an uneasy mix of football pitch, overflow parking and woodland/open meadow designated for nature conservation (SINC known as Ormond Bank and managed as a site for nature conservation by the LB Richmond Parks Department.) We have worked with community groups on this site in the past.	Support noted for the Site Allocation requirement for the creation of a pedestrian link through the site to Beveree Sports Ground. The new format of the Site Allocation also makes clear that Beveree Playing Field is OOLTI and a SINC and that Hampton Football Club is designated Public Open Space, further clarifying that the site is adjacent to these designated open spaces. Local Plan Policy 36 'Other Open Land of Townscape Importance' is clear that improvement and enhancement of OOLTI is encouraged. Local Plan Policy 39 'Biodiversity and Geodiversity' is clear that development must protect biodiversity in the SINC and that development must deliver robust and measurable net gains for biodiversity, including a at least a minimum of 20% contribution towards delivering measurable BNG. Thus a financial contribution could be sought as part of other policies within the Local Plan, if appropriate.
-		Site Allocation 4: Hampton Delivery Office, Rosehill, Hampton - no comments received		
-		Site Allocation 5: Carpark for Sainsburys, Uxbridge Road, Hampton		
295	Theresa Oddelm, The Royal Parks	Site Allocation 5: Car park for Sainsburys, Uxbridge Road, Hampton (p44) – comments specific to biodiversity and the Royal Parks' Environmental Designations	We welcome recognition of potential impacts on the Longford River and the requirement to enhance.	Support noted.
296	Richard Carr, Transport for London (TfL)	Site Allocation 5: Car park for Sainsburys, Uxbridge Road, Hampton	<p>Bus services in both directions serve a bus stop on this site that is alongside the existing store. The site allocation should make it clear that the bus stop must be retained in any redevelopment.</p> <p>The statement that parking is expected to be re-provided for the adjacent food store should be modified by stating that car parking should be minimised as part of any redevelopment consistent with stated objectives to reduce car dominance and should not exceed maximum parking standards. London Plan Policy T6 states that '<i>Where sites are redeveloped, parking provision should reflect the current approach and not be re-provided at previous levels where this exceeds the standards set out in this policy.</i></p>	<p>The wording in the 'site description' section of the Site Allocation has been amended to mention the bus stop. The wording of the allocation has been amended to include the requirement that the bus stop is retained.</p> <p>See response to comment 288 with regards to car parking standards.</p>

			<p><i>Some flexibility may be applied where retail sites are redeveloped outside of town centres in areas which are not well served by public transport, particularly in outer London’.</i></p> <p>We note that the existing petrol filling station is expected to be retained or re-provided. London Plan Policy T6 states that ‘New or re-provided petrol filling stations should provide rapid charging hubs and/or hydrogen refuelling facilities’.</p>	Reference to need for sustainable refuelling options, such as rapid charging options and/or hydrogen has been added.
297	Martin Ellis, South West London Clinical Commissioning Group (CCG)	Site Allocation 5: Carpark for Sainsburys, Uxbridge Road, Hampton	We note that the Car park site for Sainsbury’s, Uxbridge Road, Hampton (Site Allocation 5) is proposed to be released from Metropolitan Open Land status and has potential for affordable housing. If this site comes forward for development, it may generate the need for investment in healthcare infrastructure in the area.	The impact of new development on existing infrastructure can be assessed as set out in Policy 49 Part F and therefore it is not considered necessary to refer to this in the Site Allocation.
298	Vicky Phillips, Habitats & Heritage	Site Allocation 5: Carpark for Sainsburys, Uxbridge Road, Hampton p44	We are concerned about releasing this site entirely from MOL as it is an important potential green corridor site between the Longford River and the Sites of Borough Importance for Nature Conservation at Twickenham and Fulwell golf courses on the other side of Uxbridge Road. There are existing lines of greenery and trees, although the MOL is largely hard-surfacing at present. Given the vision for new affordable housing with additional public open space on part of the site which mentions the restoration of the Longford River wildlife corridor, we would like to see part of it retained as MOL until a final development plan is agreed and then the relevant green parts of the site should be kept as MOL.	<p>The Arup Open Land Review 2021 found this part of Parcel 1 ‘Longford E & Schools’ as performing weakly against all MOL designation criteria. With regards to criterion 2 and biodiversity features and landscapes, the Longford River and associated linear green strip is a designated Other Site of Nature Importance (proposed to be renamed as a SINC of borough grade) that provides green infrastructure links west to east. No other parts of the parcel are identified for their biodiversity or south to north links. With regards to criterion 4 ‘forms part of a strategic corridor, node or link in the network of green infrastructure and meets one of the above criteria’, the southern part of the parcel is identified as a fairly large green space along the Longford River blue corridor, which contributes to a local ecological and green infrastructure corridor along the local river. However, the northern tip is noted to be hard standing and thus unlikely to provide wildlife value. The only wildlife corridor identified is thus along the river and not south to north to along the north western edge towards Fulwell Golf Club. It is therefore considered that the release of this part of the parcel is justified, for the provision of 100% affordable housing, and noting too the requirement to provide BNG on site and ecological enhancements to the Longford River, which may not otherwise be achieved. It is therefore considered that the wording of the Site Allocation, and the release of the MOL, is justified and sufficient.</p> <p>No changes to reference to release of MOL. The Site Allocation makes clear that ecological enhancements to the section along Longford River would be required.</p>
299	Anna Stott, WSP on behalf of Sainsbury’s	Site Allocation 5 - Carpark for Sainsbury's St Clare's Superstore, Uxbridge Road, Hampton	<p>On behalf of our client, Sainsbury’s Supermarkets Ltd (SSL), we make this submission in response to the current consultation in respect of the Draft Local Plan: Pre-Publication version (Regulation 18) which has been prepared by the Council. Sainsbury’s operate a number of stores within the Borough two of which are the focus of these representations as they comprise emerging site allocations; the St Clare’s Superstore (Site Allocation 5) and the Richmond Superstore (Site Allocation 29). Both stores are important assets to the local community and provide many jobs for local people. Although we are generally supportive of the proposed allocations, there are key matters that are detailed later in these representations which make the Plan unsound and must be reconciled in any future versions of the emerging Plan. We explain our concerns further below.</p> <p>Draft Allocation 5 – Carpark for Sainsbury’s St Clare’s Superstore, Uxbridge Road, Hampton</p> <p>The site is currently used as car parking and a Petrol Filling Station (PFS) for the adjacent Sainsbury’s superstore. Despite these uses on the site, it is currently designated as Metropolitan Open Land (MOL).</p> <p>The site is proposed to be released from MOL as part of the Draft Local Plan proposals (Policy 35) because it is a commercial site and clearly serves no genuine MOL function. The Council’s Metropolitan Open Land Review (2021) acknowledges this. The draft allocation identifies the site for development to provide 100% affordable housing, restoration of the Longford River wildlife corridor, 20% Biodiversity Net Gain and re-provision of the car parking for the foodstore and the PFS.</p> <p>The proposed removal of the site from MOL and the re-provision of the PFS and car parking would be supported by Sainsbury’s. However, the proposal to allocate the site for 100% affordable housing is simply not justified and the allocation should be amended to remove the reference to residential tenure. Other policies will indicate the amount of affordable housing that is expected to be delivered from the site, and the tenure mix will be subject to viability.</p> <p>The draft allocation states that “the exceptional circumstances” justifying the MOL release are set out under Policy 11 to meet the identified affordable housing needs of local residents and therefore any future development scheme coming forward for this site should deliver 100% on-site affordable housing. In short, the drafting states that the development of the site for affordable housing is the exceptional circumstance justifying the site’s removal from MOL. This is not correct. The exceptional circumstances which allow the site’s removal from MOL is the fact that it is a foodstore car park and PFS. The site’s designation is a historical quirk that needs to be rectified.</p> <p>The potential tenure of the residential units has nothing to do with the exceptional circumstances justifying removal from MOL and the reference should be removed. Although “limited affordable housing” is one of the exceptions set out under paragraph 149 of the NPPF (2021) when considering inappropriate development in the Green Belt, the site would no longer be designated Page 3 as MOL and so there would be no need to restrict development to that considered acceptable in paragraph 149 of the NPPF.</p> <p>Unless these changes are made to the draft allocation, the Plan will be unsound and Sainsbury’s cannot support the allocation. We are also concerned that requiring 20% Biodiversity Net Gain (BNG) will be unfeasible. This requirement comes from Policy 39 which seeks 20% BNG. This is <u>twice</u> the requirement sought through the Environment Act 2021. For this reason, Policy 39 is</p>	<p>Support for the release of the MOL, re-provision of the petrol station and car parking is noted.</p> <p>The site is currently designated MOL and there is no evidence that this designation at the time was a mistake or ‘historical quirk’. Whilst the site is majority hard standing, the southern part of the site contains greenery which adjoins the Longford River SINC, and is thus of biodiversity value, and a western boundary of trees and greenery also exists. It is recognised that this part of the parcel performs weakly against the four criteria within the Council’s Open Land Review 2021, however it remains designated MOL and noting too the characteristics identified above, the Council is correct to require an exceptional reason for its release, that being the provision of 100% affordable housing to help address the Borough’s acute affordable housing crisis. It is further noted that as this is a former employment site, Policy 11 ‘Affordable Housing, requires a <u>minimum</u> of 50% affordable housing; there is therefore the expectation that the site should provide more. It is therefore considered that the requirements of the site allocation are justified and sound.</p> <p>The site is in an ecologically sensitive location and it is not considered unfeasible that the target could not be achieved on site. Any inability to do so would need to be fully demonstrated and justified by the applicant at planning stage, though the Council is doubtful that this would be the case, given the size of the site and the type of development being recommended. Further, ecological enhancements are required as part of the justification for the release of the MOL. It is therefore considered that the requirements of the site allocation are justified and sound.</p> <p>With regards to Policy 39 ‘Biodiversity and Geology’, the Environment Act 2021 sets out that a <u>minimum</u> of 10% BNG is required. Local Planning Authorities are free to go above this (and some other Councils have adopted 20% approach) and so Policy LP39 is not unsound in principle. The principal reason Richmond is seeking a higher BNG is that the Borough is predominantly made up of either land that has already been developed or land that is already protected as ecological sites, so opportunities are severely limited and it is necessary to protect and enhance those green and blue assets within the urban area that link to protected</p>

			<p>unsound and should be amended to reflect the requirements of the Environment Act. The allocation should also be amended to refer to 10% BNG.</p> <p>[See comment 615 in relation to Site Allocation 29 and Summary including all the changes considered necessary]</p>	<p>areas. The Whole Plan Viability Assessment 2023 has tested the impact of the 20% BNG requirement on build costs and it generally has a small impact on the residual land value (a reduction of circa 0.5%).</p>
-	Gary Rhoades-Brown	Site Allocation 5: Carpark for Sainsburys, Uxbridge Road, Hampton	[See comment 926 in relation to car parking on the site]	See response to comment 288 with regards to car parking standards. Given the Council's overall strategic aim of reducing car dependency, it would not be appropriate to request a level of on-site parking which exceeds the maximum standards set out in the London Plan, which in any case are considered likely to be sufficient. The Site Allocation makes clear that adequate parking for the supermarket will need to be retained.
-		Place-based Strategy for Teddington & Hampton Wick		
300	Graeme Fraser-Watson, The Teddington Society (Planning Group)	Section 7 Place-based Strategy for Teddington & Hampton Wick	<p>We believe that the draft local plan does a good job in recognising that Teddington is an attractive place to live in and work in and that efforts must be made to maintain and improve its attractiveness. We are pleased to see that it is recognised that Teddington, with its uniform street patterns, consistent building quality, and consistency in scale and height of existing buildings and prevalent green infrastructure has a high sensitivity to change. We applaud the strategy to conserve and enhance the town's centre's character and function and to take opportunities within the borough to improve design, deliver beautiful buildings and to ensure developments make a positive contribution to greening the borough's streets, buildings and open spaces.</p> <p>We would like you to take into account our views on the following:</p> <p>- Mid Rise buildings (Section 7: Place-based Strategy for Teddington & Hampton Wick) We are very concerned that "along the railway line north of Teddington Station" is being designated a Mid-Rise Zone. We believe that this is totally inappropriate. We believe there should be NO Mid-Rise or Tall-Building Zones in Teddington.</p> <p>You admit 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 have examples in Teddington (notably Harlequin House and the Travelodge) which are right in the centre of Teddington and are quite out of keeping with the surrounding area and buildings. These were clearly mistakes of the past and, in support of maintaining and improving the attractiveness of Teddington, it is important that such mistakes are not compounded by inappropriate new developments.</p> <p>To designate an area as a Mid-Rise zone will only encourage developers to assume that they can build 5/6 storey buildings in this area – which may be entirely inappropriate. To not have a mid-rise zone in Teddington does not mean that mid-rise buildings cannot be considered in Teddington. They may still be considered, as the draft local plan says, in areas that are not designated as Mid-Rise zones. We are not against 5/6 storey buildings being considered in appropriate settings but we are against the assumption that buildings in a particular zone should be 5/6 storeys high. By creating a Mid-Rise zone this is exactly what will happen.</p> <p>We consider that 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 19.40) and that Policy 24 includes "there is a presumption against loss of industrial land in all parts of the borough. Proposals which result in a net loss of industrial land will be refused".</p> <p>Changes considered necessary: See comments above. Most important is that any reference to a Mid-Rise Zone within Teddington should be deleted from the Plan.</p>	<p>Note the support for the Plan's recognition of the place-based strategy for Teddington and the aim to maintain and improve its attractiveness.</p> <p>The policy approach to consider mid-rise is because buildings substantially taller than their surroundings have the potential to result in significant impacts to the skyline or townscape character. Through the Urban Design Study, the findings of the characterisation study are used to identify capacity for growth and an overall development strategy, with the broad areas for tall and mid-rise buildings. It is considered appropriate for the Local Plan to take the lead in setting out opportunities for mid-rise zones. The supporting text to Policy 45 sets out that it is not expected maximum heights are achieved across the whole extent of a zone. The identified mid-rise building zone for Teddington railway side covers a small part of the town centre, limited to just the area along the railway line north of Teddington Station, across the junction of Station Road/High Street. It is therefore considered appropriate.</p> <p>B1 Teddington Town Centre has a mid-rise zone at Teddington railway side, (p.247 of the UDS) with a suggested appropriate height of 5-6 storeys along the railway line north of the station and across the junction.</p> <p>-Under sensitivity on p.91 of the UDS, the area around Station Road to the east of the railway line is identified as an area where the sensitivity is lower.</p> <p>-The design guidance on p.282 of the UDS notes '<i>there is potential for some taller development at key corner plots and around the station...</i>'</p> <p>-The capacity analysis shows the area in the vicinity of the mid-rise zone has a higher probability and higher capacity, reflecting its prominence as a town centre and further emphasised in the development strategy.</p> <p>- Whilst the UDS notes that Harlequin House detracts from character, the design review on p.377 of the UDS provides a high level review of the design quality of Informer House. It concludes it establishes a building of more appropriate scale for the plot, reflecting its relationship between the station and high street.</p> <p>Additional wording added to character profile: Added wording to clarify the poor quality developments near the station are Travelodge and Harlequin House (within key characteristics and negative qualities). In negative qualities, added reference to lack of legibility between station and High Street.</p> <p>Additional wording added to design guidance: <i>There is opportunity for improving legibility between the station and High Street. A vision/masterplan for the area between the station and High Street would help to direct appropriate forms and types of development and improve the character in this part of the area.</i></p> <p>Additional wording added to mid-rise zone The zone occupies the area alongside the railway line north of Teddington Station, and across the junction of Station Road/High Street to include the 2-3 storey buildings of Marvan Court. It includes the recently completed 5-6 storey development Informer House and the adjacent 5-6 storey Travelodge. Other than Marvan Court, the zone sits outside the High Street Teddington Conservation Area.</p>

				The mid-rise zone reflects the opportunity to better integrate the recently completed Informer House and Travelodge developments into their surrounding context and to create a legible pattern of development between the station and High Street. Proposed buildings should respond to surrounding context, stepping down in scale where appropriate to lower prevailing context. Existing industrial uses within the Locally Significant Industrial Site (LSIS) should be retained.
301	Theresa Oddelm, The Royal Parks	Place-based Strategy for Teddington & Hampton Wick	This is particularly relevant as it refers directly to Bushy Park. Specifically, an employment site is proposed on the edge of Bushy Park and three incremental intensification zones overlap with the Park. Whilst we agree with the inclusion of Bushy Park within the vision for Teddington and Hampton Wick, we would encourage the inclusion of specific mention of Bushy Park within the policy for future development to ensure that it is specifically considered when improving and creating connections between open spaces. We would emphasise that we would like to be involved further on in the plan process to ensure that any development around the Park is carried out with due care and consideration for it.	The policy requires development to protect, improve and increase open spaces, the connections between them and views to green spaces and the Thames Corridor. It is considered that this policy requirement would clearly be relevant to development proposals located near Bushy Park, and so specific mention of Bushy Park is not considered necessary, particularly as its importance to the character of the area is identified throughout the place-making strategy for Hampton Wick and Teddington.
302	Theresa Oddelm, The Royal Parks	Place-based Strategy for Teddington & Hampton Wick – comments specific to biodiversity and the Royal Parks’ Environmental Designations	<u>Policy (page 48)</u> Future development plans should include reference to the <u>protection</u> of open space (as well as ‘increasing and improving’) given the risk to open space associated with increased recreational pressure	Add reference to protect open space in the place-based policy, and reference to the recreational pressures into the vision for Teddington & Hampton Wick (reflecting that this is already acknowledged elsewhere in the draft Plan).
303	Robert Blakebrough	Section 7 Place Based Strategy - Teddington and Hampton Wick (<i>this point also made on response form against the place-based strategies</i>)	I do not see why ratepayers/tapayers should subsidise so called affordable housing for those who cannot afford to live in Teddington. Why should a place we have worked hard and struggled to afford to live in and have had to pay the full cost to be lived in, be devalued ? if someone cannot afford the property prices they should go somewhere they can afford. Section 7 Place-based strategy Teddington & Hampton Wick; and Policy 11 Affordable Housing (Strategic Policy). There is no mention of Eleray Hall in Middle Lane, Teddington, which, contrary to Section 16 (Responding to the Climate Emergency and Taking Action), and in the face of strong local opposition is proposed for demolition and re-build instead of refurbishment. See Section 7 Place Based Strategy Teddington and Hampton Wick; See Section 16 A and 16 B.3 Changes considered necessary: No more affordable/social housing in Teddington and Hampton Wick. I cannot afford to live in Belgravia, therefore I do not live in Belgravia No more hideous mid-rise in Teddington and Hampton Wick such as the Travelodge on Station Road Teddington.-self evident eyesore	The borough is experiencing an acute affordable housing crisis and the Council is committed to delivering affordable homes to meet a range of needs of local residents and workers. Funding can come from a number of sources – there is Government grant funding (through the new Homes for Londoners: Affordable Homes Programme 2021-2026), funding from housing associations as well as Councils, and where appropriate contributions are secured from private developers. Sites do come forward for development outside of the Local Plan process of allocating sites, and can be assessed all the policy requirements set out in the Local Plan. Proposals for Elleray Hall were brought forward during 2021 and permission 21/2533/FUL has now been granted. See response to comment 300 in relation to mid-rise buildings in Teddington.
-		Site Allocation 6: Telephone Exchange, Teddington		
304	David Wilson, Thames Water	SA5 Telephone Exchange, High Street, Teddington	Thames Water Site ID: 49784 (Reviewed Jan18) Water Response On the information available to date we do not envisage infrastructure concerns regarding water supply network infrastructure in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ Waste Response On the information available to date we do not envisage infrastructure concerns regarding wastewater network or wastewater treatment infrastructure capability in relation to this site/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ Additional Comments With regard to SURFACE WATER drainage, Thames Water would advise that if the developer follows the sequential approach to the disposal of surface water we would have no objection. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. Site ID: 49785	Amend the site allocations format to include a description of the site/wider area and relevant constraints, to include identification of the flooding constraints for each site. Flood risk / SuDS matters are covered in Policy 8 of this Plan and it is therefore not considered necessary to set out the requirements of developers for this in the Site Allocations.
305	Vicky Phillips, Habitats & Heritage	Site Allocation 6: Telephone Exchange, Teddington p50	The green space in front of this building is a wildflower area (with scope for improvement) which has a particularly good display in spring and should be retained and developed as a local green hub if possible.	Amend the site allocations format to include a description of the site/wider area and relevant constraints, to include identification of open spaces and areas of ecological/wildlife value. Amend policy requirement within the Site Allocation to clarify that the open space to be retained is the ‘green’ open space which is considered to have biodiversity value.
-		Site Allocation 7: Teddington Delivery Office, Teddington		
306	David Wilson, Thames Water	SA7 Strathmore Centre, Strathmore Road, Teddington	Thames Water Site ID: 49785 (Reviewed May 21) Water Response	See response to comment 304 in relation to flood risk/SuDS in the Site Allocations.

			<p>On the information available to date we do not envisage infrastructure concerns regarding water supply network infrastructure in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ</p> <p>Waste Response</p> <p>On the information available to date we do not envisage infrastructure concerns regarding wastewater network or wastewater treatment infrastructure capability in relation to this site/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ</p> <p>Additional Comments</p> <p>With regard to SURFACE WATER drainage, Thames Water would advise that if the developer follows the sequential approach to the disposal of surface water we would have no objection. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required.</p> <p>The proposed development is located within 15 metres of our underground waste water assets and as such we would like the following informative attached to any approval granted. "The proposed development is located within 15 metres of Thames Waters underground assets and as such, the development could cause the assets to fail if appropriate measures are not taken. Please read our guide 'working near our assets' to ensure your workings are in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures.</p>	
-		Site Allocation 8: Strathmore Centre, Strathmore Road, Teddington - no comments received		
-		Site Allocation 9: Teddington Police Station, Park Road, Teddington		
307	Nicholas Grundy (responding as partners at Park Road Surgery)	Draft Local Plan: Site Allocation 9	<p>We are responding as the partners at Park Road Surgery in Teddington, specifically to Site Allocation 9 (Teddington Police Station).</p> <p>We are an NHS GP surgery which looks after just over 13,000 patients across a catchment area which includes the Teddington ward and part or all of the five neighbouring wards of Fulwell & Hampton Hill, Hampton, Hampton Wick, South Twickenham, and West Twickenham. Our existing premises is a converted Victorian house which should let us look after about 3,400 patients, meaning we are accommodating about 10,000 more patients than the building should; this is the highest number of excess patients for any surgery in the borough, and our urgent need to move premises is recognised in that we are top priority in the Richmond CCG Estates Strategy.</p> <p>We would therefore ask that Site Allocation 9 specifies that this medical need must be met as part of any redevelopment of the Police Station, in line with the existing text which says that "proposed redevelopment of the site will only be acceptable if a community/social infrastructure use is reprovided on site at ground floor level, such as for a medical/health use."</p> <p>While this wording is welcome, in other parts of Richmond sites have been redeveloped ostensibly to provide medical facilities without the necessary agreements from the surgeries themselves or the CCG – for instance, the 2014 permission on the old Dairy Crest site on Orchard road in Kew included a 1,090m2 "GP surgery" which was still empty, and being marketed as retail space, 5 years later. The Teddington Police Station is too important a site for this to happen, and any planning consent should specify that the need outlined in the Local Plan and the CCG Estates Strategy is met, and make sale or lease of any residential units conditional on the occupation of the GP space.</p> <p>We also call for the site allocation to be more specific about the need for a co-located health and social care facility, combining our need with space for local charities and a shared community space for health and wellbeing.</p> <p>This matters because the Teddington Police Station is a large community asset in the centre of Teddington, and because ongoing residential development without corresponding healthcare development increases the pressures GP surgeries are under, and worsen the service available to patients. Park Road Surgery's existing building is operating at capacity all the time, with nowhere physically to put more staff to answer the phones or to see patients, nor to cope with spikes in demand like winter pressures. Physical access is terrible, particularly for those with buggies, or mobility difficulties, and half the consulting rooms are on the first floor.</p> <p>The increased pressure on appointments makes it harder to offer continuity of care, and longer waits have knock-on effects on walk-in and A&E services. We work hard to mitigate these factors, but we are at the limit of what we're able to do where we are. We have been in discussions with the CCG and NHS England over new premises since 2010, having looked at numerous sites over that time. Securing a new surgery on this site would:</p> <ul style="list-style-type: none"> • significantly improve local residents' access to healthcare • support national policy, in particular the aims set out in the NHS Long-Term Plan to move care out of hospital and into the community • support the Teddington Village Plan • improve disabled access • support the strategic aim for social and community infrastructure and "flexible spaces[...]as part of multi-purpose assets" ("Securing new social and community infrastructure", draft Local Plan) <p>We wholeheartedly support the proposals in the draft Site Allocations, but would ask that they are strengthened as above to ensure the site continues to be an asset for Teddington in years to come.</p>	<p>No changes proposed to the future acceptable land uses section of the Site Allocation as this already makes clear that redevelopment of the site will only be acceptable if a community/social infrastructure use is re-provided on the site, such as for a medical/health use. Thus should there be a desire for Park Road Surgery to occupy the site, this could be accommodated.</p> <p>Policy 49 'Social and Community Infrastructure' in this Plan already encourages the co-location of uses, therefore no change is required.</p> <p>It would not be appropriate for planning to control the sale/lease of residential units on condition of the occupation of the GP space. Whilst the social/community infrastructure use can be protected via planning, planning cannot control or dictate which end-user, within the social/community use class, ultimately occupies the space. Secondly, it is not considered that controlling the sale/lease of the residential units would meet the NPPF tests for a planning obligation. The retention of the community/social use via planning policy is considered to be appropriate and sufficient. Finally, limiting the sale/lease of properties and the timing of their coming forward could have viability implications for the deliverability of the scheme overall.</p> <p>The updated Infrastructure Delivery Plan also sets out the existing shortfall and identifies existing and future needs and demands for the borough, including the current snapshot on health. This informs the application of Policy 49 on future applications, and the supporting text already gives emphasis to assessing the impact on health infrastructure.</p>
308	Emma Nicholls, Park Road Surgery on behalf of patients	Draft Local Plan: Site Allocation 9	[The Practice Manager at the Surgery indicated a few respondents were unable to submit their comments online (F A Row Botham, M Landau, M Osorio, and three unnamed respondents. Details as follows)]	See response to comment 307 in relation to Park Road Surgery.

			<p>We have been contacted by a few patients, registered at this surgery, who wanted to make comments on the local plan and have been unable to submit their comments through the online form. They want to support the practice's request that there is a planning requirement on the Teddington police station site that there must remain a provision for healthcare and community use.</p> <p>F. A. ROWBOTHAM: Section 7. Site Allocation 9. Teddington Police Station and The Park Road Surgery website. As encouraged by the Park Road Surgery, 37 Park Road, Teddington, Middlesex, TW11 ... as a Patient and as a nearby Resident (rather elderly) I have tried very hard to make the relevant comments about the Teddington Police Station, which needs to be sent in by Today. I completed your relevant Form, Section 7. Site Allocation 9., but was unable to master how to Email it to yourselves. Therefore I am trying to do it this way. Could you please register on the suggested relevant Planning Forms that I wish to support The Park Road Surgery, Teddington, in their website comments? [See also comment 481 from F A Rowbotham]</p> <p>M Landau: Unable to put my comments on the website. I think the police Station would be an ideal location for the surgery to move to. Bigger premises to deal with ever growing population of Teddington. It benefits the community. Have parking facilities for both medical staff and patients. Much better than having more housing without parking facilities !! Richmond council should agree your application. Good luck you will need it</p> <p>M Osorio: Dear Park Road Surgery I totally and wholeheartedly support the proposal to move the Surgery to The Police station site. I have been pressing for this for years and have spoken many times to local counsellors on this proposal. It is CENTRAL, ACCESSIBLE, AND NEAR ALL PUBLIC TRANSPORT WITH SPACE FOR PAR@R PARKING. IDEAL FOR PEOPLE ON THEIR WAY TO PR FROM WORK etc etc GOOD LUCK</p> <p>Unnamed recipient: I support the petition to relocate the Park Road Surgery to Teddington Police Station which I believe in an appropriate transition to larger landmark building. This is a timely move considering the current Covid-19 required policies in place to its spread. When move is finalised I will consider returning my care the surgery along with the rest of my family who are still registered at the surgery. Thank you for the opportunity to comment</p> <p>Unnamed recipient: I support park road surgery teddington in their application request to take over premises at teddington police station from a patient of said surgery</p> <p>Unnamed recipient: I think it would be an excellent idea as it would give the staff far more room which in turn would enhance facilities plus for patients</p>	
309	Angela Appleby	Site Allocation 9: Teddington Police Station, Park Road, Teddington	<ul style="list-style-type: none"> - Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment - Any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery 	See response to comment 307 in relation to Park Road Surgery.
310	Ben Ayliffe	Site Allocation 9: Teddington Police Station, Park Road, Teddington (<i>this point also made on response form against the strategic vision, and the place-based strategies</i>)	<p>"I am commenting on site allocation 9, Teddington Police Station, to ask that:</p> <ul style="list-style-type: none"> - the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment - any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery." 	See response to comment 307 in relation to Park Road Surgery.
311	Sarah Ball	Section 7, Site Allocation 9: Teddington Police Station, Park Road, Teddington	<p>I am commenting on site allocation 9, Teddington Police Station, to ask that:</p> <ul style="list-style-type: none"> - the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment - any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery. 	See response to comment 307 in relation to Park Road Surgery.
312	Robin Sinclair	Site Allocation 9: Teddington Police Station, Park Road, Teddington	<p>Comment on site allocation 9, Teddington Police Station :</p> <p>Can I request that :</p> <ul style="list-style-type: none"> - the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment - any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery. 	See response to comment 307 in relation to Park Road Surgery.
313	Leah Regel	Section 7, Site Allocation 9: Teddington Police Station, Park Road, Teddington	<p>I am commenting on site allocation 9, Teddington Police Station, to ask that:</p> <ul style="list-style-type: none"> - the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment - any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery 	See response to comment 307 in relation to Park Road Surgery.
314	Edward Cummings	Section 7 of the plan, site allocation 9, Teddington Police Station	<p>I am commenting on site allocation 9, Teddington Police Station, to ask that:</p> <ul style="list-style-type: none"> - the local Plan requires my local GP surgery, Park Road Surgery, to be relocated there as part of any redevelopment - any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery. Thank you 	See response to comment 307 in relation to Park Road Surgery.

315	Alan Brocklehurst	Section 7, Site Allocation 9: Teddington Police Station, Park Road, Teddington	"I am commenting on site allocation 9, Teddington Police Station, to ask that: – the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment – any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery."	See response to comment 307 in relation to Park Road Surgery.
316	EE McClelland	Place Based Strategy - Teddington - Police Station Site on Park Road	I would like to express my support for redevelopment of the police station in Teddington for a health centre - the existing surgery in Park Road is cramped and aging building not particularly well suited (especially the stairs) for access with babies, older people and the sick generally.	See response to comment 307 in relation to Park Road Surgery.
317	Emma Nicholls	Section 7, Site Allocation 9, Teddington Police Station <i>(this point also made against the place-based strategies)</i>	I am commenting on site allocation 9, Teddington Police Station, to ask that: – the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment – any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery. I support Park Road Surgery's need to move to new premises, in order to improve healthcare provision locally and to give the opportunity to extend health and well-being services to have the space to work together. This would be a much better use of the Police Station site than more housing units.	See response to comment 307 in relation to Park Road Surgery.
318	Charles Griffiths	Section 7, Site Allocation 9, Teddington Police Station	I am commenting on site allocation 9, Teddington police station, to ask that the local plan requires that Park Road surgery gets relocated there as part of any re-development - any planning consent makes the sale or lease of residential units conditional on the occupation of the GP surgery.	See response to comment 307 in relation to Park Road Surgery.
319	Christopher Loughton	Site Allocation 9: Teddington Police Station, Park Road, Teddington	I refer on site allocation 9, Teddington Police Station, to ask that: – the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment – any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery.	See response to comment 307 in relation to Park Road Surgery.
320	Clair O'Brien-White	Site Allocation 9: Teddington Police Station, Park Road, Teddington <i>(this point also made on response form against the strategic vision)</i>	I am commenting on site allocation 9 Teddington Police Station, to ask that; the local plan requires Park Road Surgery to be relocated there as part of any redevelopment. Any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery. This would allow the surgery to expand its services to serve the population it serves in the most effective way.	See response to comment 307 in relation to Park Road Surgery.
321	Danielle Cantillon	Section 7, Site Allocation 9, Teddington Police Station	I am commenting on section 7, site allocation 9, Teddington Police Station, to ask that: – the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment as their current premises is no longer fit for purpose. This is badly needed for the community – any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery.	See response to comment 307 in relation to Park Road Surgery.
322	Alison Thomson	Section 7, Site Allocation 9, Teddington Police Station	I am commenting on site allocation 9, Teddington police station. I ask that the Local plan requires Park Road Surgery to be relocated there as part of any redevelopment. Any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery. Park Road Surgery is a vital part of our community but has outgrown its space and must be part of this redevelopment.	See response to comment 307 in relation to Park Road Surgery.
323	John Coleman	Section 7, Place-based Strategy for Teddington & Hampton Wick, Site Allocation 9: Teddington Police Station	I am commenting on site allocation 9, Teddington Police Station, to ask that: – the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment – any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery.	See response to comment 307 in relation to Park Road Surgery.
324	Nuala Orton	Section 7, Site Allocation 9, Teddington Police Station <i>(this point also made on response form against the strategic vision, strategic objectives, and the place-based strategies)</i>	I am commenting on Section 7, Site Allocation 9, Teddington Police Station, to ask that: – the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment – any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery.	See response to comment 307 in relation to Park Road Surgery.
325	Mark Lawson	Section 7, specifically Site Allocation 9, Teddington Police Station	I am commenting on site allocation 9, Teddington Police Station, strongly requesting that: – the Local Plan requires Park Road Surgery to be relocated within the above building as part of any redevelopment – any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery. As I enter my 60s this year, battling [personal health condition details removed for data protection] , I am alarmed that the surgery's current premises is 10k over-capacity with more on the way. My doctors there provide me with an excellent service, as well as the nurse who administers my blood tests, and I would like their premises to reflect their expertise & professionalism in the larger building across the road.	See response to comment 307 in relation to Park Road Surgery.
326	Margaret Loughton	Site Allocation 9: Teddington Police Station, Park Road, Teddington	I refer to site allocation 9, Teddington Police Station, to ask that: – the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment – any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery.	See response to comment 307 in relation to Park Road Surgery.
327	Kerem Eryavuz	Section 7, Site Allocation 9, Teddington Police Station	"I am commenting on site allocation 9, Teddington Police Station, to ask that: – the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment – any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery."	See response to comment 307 in relation to Park Road Surgery.
328	Matthew Casson	Section 7, Site Allocation 9, Teddington Police Station <i>(this point also made on response form against the strategic vision)</i>	I am commenting on site allocation 9, Teddington Police Station, to ask that: – the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment – any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery.	See response to comment 307 in relation to Park Road Surgery.
329	Alison Parkes	Section 7, Site Allocation 9, Teddington Police Station <i>(this point also made on response form against the place-based strategies)</i>	I would like to comment of Section 7, Site Allocation 9, Teddington Police Station. It is already suggested that this site may be suitable for housing and/or community medical service. Park Road surgery currently operates in a very limited space created from a Victorian house. Despite the fact that this is not ideal surroundings, it provides an extremely valuable role within the community. As a registered patient at the surgery, I know it deserves a better space to continue to serve the community well into the 21st century. I would particularly request that: - the Local Plan requires Park Road Surgery to be relocated there as part of ANY redevelopment, - any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery.	See response to comment 307 in relation to Park Road Surgery.

330	Jessica King	Section 7, Site Allocation 9: Teddington Police Station, Park Road, Teddington	I am commenting on site allocation 9, Teddington Police Station, to ask that: – the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment – any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery.	See response to comment 307 in relation to Park Road Surgery.
331	Susan Park	Section 7 / Site Allocation 9: Teddington Police Station, Park Road, Teddington	I am commenting on site allocation 9, Teddington Police Station, to ask that: – the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment – any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery.	See response to comment 307 in relation to Park Road Surgery.
332	Stephanie Saul	Section 7, Site Allocation 9: Teddington Police Station, Park Road, Teddington	“I am commenting on site allocation 9, Teddington Police Station, to ask that: – the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment – any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery.”	See response to comment 307 in relation to Park Road Surgery.
333	Paul Sanders	Section 7 / Site Allocation 9: Teddington Police Station, Park Road, Teddington	I am commenting on site allocation 9, Teddington Police station, to ask that ; - the local Plan requires Park Road Surgery to be relocated there as part of any redevelopment - any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery. It’s a well run surgery and badly needs more space and the location being so near, will not change the demographics of existing patients or impinge on other surgeries in Teddington.	See response to comment 307 in relation to Park Road Surgery.
334	Lesley Forster	Relating to para 7 re Teddington and Hampton Wick	I am commenting on site allocation 9, Teddington Police Station, to ask that: – the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment – any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery.	See response to comment 307 in relation to Park Road Surgery.
335	Anthony Langridge	Section 7, Site Allocation 9: Teddington Police Station, Park Road, Teddington	My response relates to Section 7, Teddington Police Station and I firmly believe that Park Road Surgery be relocated within the proposal for Social Housing as part of any redevelopment and that any planning consent makes the sale or lease of any residential units conditional on the occupation of Park Road Surgery. Adopting this would move me to an "Agree" position.	See response to comment 307 in relation to Park Road Surgery.
336	Andy Collier	Section 7, Site Allocation 9, Teddington Police Station (<i>this point also made on response form against the place-based strategies</i>).	I am commenting on site allocation 9, Teddington Police Station, to ask that: – the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment – any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery.	See response to comment 307 in relation to Park Road Surgery.
337	Yvonne Hooker	Section 7, Place-based Strategy for Teddington & Hampton Wick, Site Allocation 9: Teddington Police Station	The Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment	See response to comment 307 in relation to Park Road Surgery.
338	Tracey Costard	Section 7, Place-based Strategy for Teddington & Hampton Wick, Site Allocation 9: Teddington Police Station	I am commenting on site allocation 9, Teddington Police Station, to ask that: - the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment - any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery.	See response to comment 307 in relation to Park Road Surgery.
339	Simon Redding	Site Allocation 9: Teddington Police Station, Park Road, Teddington	“ am commenting on site allocation 9, Teddington Police Station, to ask that: – the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment – any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery.	See response to comment 307 in relation to Park Road Surgery.
340	Steve Rigge	Section 7, Place-based Strategy for Teddington & Hampton Wick, Site Allocation 9: Teddington Police Station	I am commenting on site allocation 9, Teddington Police Station, to ask that: – the Local Plan requires Park Road Surgery to be relocated there as an essential part of any redevelopment plan – any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery.”	See response to comment 307 in relation to Park Road Surgery.
341	Daniel England	Section 7, Site Allocation 9, Teddington Police Station (<i>this point also made on response form against the strategic vision, strategic objectives, Policies 1 and 2, and the place-based strategies</i>)	“I am commenting on site allocation 9, Teddington Police Station, to ask that: – the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment – any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery.”	See response to comment 307 in relation to Park Road Surgery.
342	Melissa Hallan	Section 7, Site Allocation 9: Teddington Police Station, Park Road, Teddington	“I am commenting on site allocation 9, Teddington Police Station, to ask that: – the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment – any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery.”	See response to comment 307 in relation to Park Road Surgery.
343	Richard Hooker	Section 7 (Teddington and Hampton Wick), Site Allocation Teddington Police Station etc.	I suggest that the Local Plan provides for the Park Road Surgery to be relocated to the police station site as part of any redevelopment	See response to comment 307 in relation to Park Road Surgery.
344	Elizabeth Honer	Section 7, Site Allocation 9: Teddington Police Station, Park Road, Teddington	I am commenting on site allocation 9, Teddington Police Station, to ask that: – the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment – any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery.	See response to comment 307 in relation to Park Road Surgery.
345	Anna McGeoghegan	Site Allocation 9: Teddington Police Station, Park Road, Teddington	I am commenting on site allocation 9. Teddington Police Station to ask that the local Plan requires Park Road surgery to be relocated there as part of the redevelopment - any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery.	See response to comment 307 in relation to Park Road Surgery.
346	Tara Munday	Section 7, Site Allocation 9: Teddington Police Station, Park Road, Teddington	I am commenting on site allocation 9, Teddington Police Station, to ask that: – the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment – any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery	See response to comment 307 in relation to Park Road Surgery.
347	Hannah Oneill	Section 7, Site Allocation 9: Teddington Police Station, Park Road, Teddington	I am commenting on site allocation 9, Teddington Police Station, to ask that: – the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment – any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery.	See response to comment 307 in relation to Park Road Surgery.
348	Audrey Rigge	Section 7, Place-based Strategy for Teddington & Hampton Wick, Site Allocation 9: Teddington Police Station	I am commenting on site allocation 9, Teddington Police Station, to ask that: – the Local Plan requires Park Road Surgery to be relocated there as an essential part of any redevelopment – any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery.”	See response to comment 307 in relation to Park Road Surgery.
349	Jonathan Wax	Section 7, Place-based Strategy for Teddington & Hampton Wick, Site Allocation 9: Teddington Police Station	I am commenting on site allocation 9, Teddington Police Station. We need a defined, certain plan for Park Road Surgery. Therefore I believe that:	See response to comment 307 in relation to Park Road Surgery.

			1. The Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment. 2. Any planning consent makes the sale or lease of any residential units conditional on the occupation of the by the GP surgery currently sited opposite, known as Park Road Surgery.	
350	Nicholas Carpenter	Section 7, Site Allocation 9: Teddington Police Station, Park Road, Teddington	"I am commenting on site allocation 9, Teddington Police Station, to ask that: – the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment – any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery."	See response to comment 307 in relation to Park Road Surgery.
351	Corinna Durocher	I am responding to section 7 of the plan, specifically Site Allocation 9. (<i>this point also made on response form against the place-based strategies</i>)	My comments refer to section 7 of the plan, specifically site allocation 9, Teddington Police Station. I'd like to ask that, for the benefit of all of us living in the area, the Local Plan requires that Park Road Surgery be relocated there as part of any redevelopment project - any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery. Thanks.	See response to comment 307 in relation to Park Road Surgery.
352	Carol Morey	Section 7, Site Allocation 9, Teddington Police Station	Please can the Local Plan require Park Road Surgery to be relocated to the Teddington Police Station site as part of any development of the site. Planning consent should be conditional on the relocation of the GP surgery, and the new building should be no taller than the current police station.	See response to comment 307 in relation to Park Road Surgery.
353	Benjamin John	Section 7, Site Allocation 9: Teddington Police Station, Park Road, Teddington	With regard to Teddington Police Station (9) I agree to the proposals and would like to register my opinion that a move from the present location of the GP surgery at Park Rd to be included in any plan for the repurposing of Teddington GP Practice	See response to comment 307 in relation to Park Road Surgery.
354	Sandra Worth	Section 7, Site Allocation 9: Teddington Police Station, Park Road, Teddington	I am commenting on site allocation 9, Teddington Police Station, to ask that: – the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment – any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery."	See response to comment 307 in relation to Park Road Surgery.
355	Adrian Mullen	Section 7, Place-based Strategy for Teddington & Hampton Wick, Site Allocation 9: Teddington Police Station	I am commenting on site allocation 9, Teddington Police Station, to ask that: – the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment – any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery.	See response to comment 307 in relation to Park Road Surgery.
356	Alison Campbell	7 Teddington area and Site allocation 9 Old police station.	I strongly agree this should be for community use especially a relocating of the nearby GP centre, other community needs and some really affordable housing. The site should be redeveloped as a whole within the 1-5 year period. It should not be sold to a private developer.	See response to comment 307 in relation to Park Road Surgery.
357	Ursula Armstrong	Site Allocation 9: Teddington Police Station, Park Road, Teddington (<i>this point also made on response form against the strategic objectives, Policies 1 and 2, and the place-based strategies</i>)	"I am commenting on site allocation 9, Teddington Police Station, to ask that: – the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment – any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery."	See response to comment 307 in relation to Park Road Surgery.
358	Irene Iwunze	Section 7, Site Allocation 9: Teddington Police Station, Park Road, Teddington	I am commenting on site allocation 9, Teddington Police Station, to ask that: – the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment – any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery."	See response to comment 307 in relation to Park Road Surgery.
359	Jonathan Price	Site Allocation 9: Teddington Police Station, Park Road, Teddington	We strongly support and encourage that Park Road Surgery be relocated to the site currently known as Teddington Police Station. That the site is just across the road from the surgery's current location is ideal - this will ensure the minimum amount of disruption to all those who use the surgery, health care workers and patients, for it staying close to the train station, many bus stops, the pharmacy on Park Road and with Boots, also so close by on Broad Street. So as to make the best use of the building for the community - both in terms of health care and housing - we would ask that any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery. We can think of no better use for this building.	See response to comment 307 in relation to Park Road Surgery.
360	N'Yasha Bailey	Section 7, Site Allocation 9: Teddington Police Station, Park Road, Teddington (<i>this point also made on response form against the place-based strategies</i>)	I am commenting on site allocation 9, Teddington Police Station, to ask that: – the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment – any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery	See response to comment 307 in relation to Park Road Surgery.
361	Deborah Waddon	I am commenting on Section 7 of the plan, site allocation 9, Teddington Police Station	I am in favour of this property being developed into affordable housing to rent or buy and hope priority will be given to residents that are residing within their family homes they have grown up in inside the borough and to others that are wishing to remain in this locality to be able to afford housing on lower incomes. Also I am in total favour of this property having an allocation within the ground floor to house The Park Road Surgery which is in desperate need of new premises to alleviate the pressure it is under caring for the local population and to which it offers a first class service. I am exceptionally fortunate to be able to live in this wonderful part of our borough and would like my children to be able to do so also and that as a family of different generations we can work together and support each other within the family unit i.e. i am a grandmother and would like to be able to offer help to my younger family assisting with childcare to enable them to work and contribute to the economy. Also as a widow it would be a great comfort to me knowing I have the support of my family close by.	See response to comment 307 in relation to Park Road Surgery.
362	Moira Welch	Section 7 of the Plan Site allocation 9	I am commenting on site allocation 9, Teddington Police Station, to ask that: - the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment - any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery	See response to comment 307 in relation to Park Road Surgery.
363	Sarah Phillips	Section 7, Site Allocation 9: Teddington Police Station, Park Road, Teddington	I am commenting on site allocation 9, Teddington Police Station, to ask that: – the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment – any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery	See response to comment 307 in relation to Park Road Surgery.
364	Celia Till	Site Allocation 9: Teddington Police Station, Park Road, Teddington	I agree with the statement that "redevelopment of the Teddington Police Station site will only be acceptable if a community/ social infrastructure use is reprovided on the site at ground floor level, such as for a medical/health use". Specifically, I ask that	See response to comment 307 in relation to Park Road Surgery.

			the Local Plan requires Park Road Surgery to be relocated there, and any planning consent for residential units to be conditional on this.	
365	Liz Baran	Section 7, Place-based Strategy for Teddington & Hampton Wick, Site Allocation 9: Teddington Police Station	Apart from this website being extremely difficult to navigate (is that to ensure no one bothers to object to anything?) I am commenting on site allocation 9, Teddington Police Station to ask that: 1) The Local Plan requires Park Road Surgery to be relocated there as part of any development 2) Any Planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery	See response to comment 307 in relation to Park Road Surgery.
366	@PP	Section 7, Place-based Strategy for Teddington & Hampton Wick, Site Allocation 9: Teddington Police Station	I am commenting on site allocation 9, Teddington Police Station, to ask that: – the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment – any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery.	See response to comment 307 in relation to Park Road Surgery.
367	Winifred McGee	Section 7, Place-based Strategy for Teddington & Hampton Wick, Site Allocation 9: Teddington Police Station	I am commenting on site allocation 9, Teddington Police Station, to ask that:-the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment-anyplanning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery.	See response to comment 307 in relation to Park Road Surgery.
368	Matthew Doughty	Section 7, Place-based Strategy for Teddington & Hampton Wick, Site Allocation 9: Teddington Police Station	“I am commenting on site allocation 9, Teddington Police Station, to ask that: – the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment – any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery.”	See response to comment 307 in relation to Park Road Surgery.
369	Vicky Phillips, Habitats & Heritage	Site Allocation 9: Teddington Police Station, Park Road, Teddington p65	We agree with the need to retain the existing green triangle to the north and open it up to the public as a pocket park. We support the provision of a doctor’s surgery on the ground floor and think that there is room for additional green space to be provided on site as a garden for patients and those living in the affordable housing. Presumably this is a building which the Council would like to see refurbished rather than demolished in accordance with Policy 3B para 3?	See response to comment 307 in relation to Park Road Surgery.
370	Ina Stradins	Section 7, Site Allocation 9, Teddington Police Station	“I am commenting on site allocation 9, Teddington Police Station, to ask that: – the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment – any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery.”	See response to comment 307 in relation to Park Road Surgery.
371	Steve Honeybourne	Site Allocation 9: Teddington Police Station, Park Road, Teddington	I am commenting on site allocation 9, Teddington Police Station, to ask that the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment and any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery.	See response to comment 307 in relation to Park Road Surgery.
372	Judie Cole	Site Allocation 9: Teddington Police Station, Park Road, Teddington	Teddington Police Station for Park Road Surgery relocation. I most certainly wish to support this relocation: the current excellent surgery needs modernising and more space has to be found. It is a popular local surgery which local residents are very satisfied with and does its duties superbly to keep all healthy and safe as far as possible.	See response to comment 307 in relation to Park Road Surgery.
373	Terence Hirst	Section 7, Site Allocation 9, Teddington Police Station	“I am commenting on site allocation 9, Teddington Police Station, to ask that: – the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment – any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery.”	See response to comment 307 in relation to Park Road Surgery.
374	Martin Ellis, South West London Clinical Commissioning Group (CCG)	Site Allocation 9: Teddington Police Station, Park Road, Teddington	We note that within the town centre boundary, there is potential for new development at key sites, including Teddington Police Station (Site Allocation 9). We support the site proposal for community/social infrastructure led mixed use development with an element of residential. This could include healthcare/medical use as Park Road Surgery are keen to explore this option to move to new premises.	See response to comment 307 in relation to Park Road Surgery.
375	Charles Titcombe	Site Allocation 9: Teddington Police Station, Park Road, Teddington	I am commenting on site allocation 9, Teddington Police Station, to ask that: – the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment – any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery.	See response to comment 307 in relation to Park Road Surgery.
376	John McCarthy	Site Allocation 9: Teddington Police Station, Park Road, Teddington	I am commenting on site allocation 9, Teddington Police Station, to ask that: – the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment – any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery.	See response to comment 307 in relation to Park Road Surgery.
377	Anna Kendall	Section 7, Site Allocation 9: Teddington Police Station, Park Road, Teddington	“I am commenting on site allocation 9, Teddington Police Station, to ask that: – the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment – any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery.”	See response to comment 307 in relation to Park Road Surgery.
378	Douglas Craik	Section 7, Site Allocation 9: Teddington Police Station, Park Road, Teddington (<i>this point also made on response form against the place-based strategies</i>)	With respect to site allocation 9, Teddington Police Station, to ask that: – the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment - that in this case priority be given to use of the ground floor level allowing step-free access – any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery.	See response to comment 307 in relation to Park Road Surgery.
379	Christine Craik	Site Allocation 9: Teddington Police Station, Park Road, Teddington	With respect to site allocation 9, Teddington Police Station, to ask that: – the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment - that in this case priority be given to easy access for less mobile patients – any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery.	See response to comment 307 in relation to Park Road Surgery.
380	Moya Meredith Smith	Site Allocation 9: Teddington Police Station, Park Road, Teddington	Yes essential to go ahead ASAP for move of Park Road surgery and Health Centre to Site of Old Police Station, especially as all other sites turned down over the last few years. Ideal site for parking, access and ambience, couldn’t find a better place for this very active and you to date practice. Easy access for all patients and still ear to station for those who work in London or other. I very strongly approve of the plan associated with some residentAI accommodation, like flats for the elderly etc	See response to comment 307 in relation to Park Road Surgery.
381	Conor Mulhern	Site Allocation 9: Teddington Police Station, Park Road, Teddington	I have been resident in Teddington for just over 20 years, and one of the key resources for me the GP Surgery located on Park Road in Teddington. I have been aware for some time that the Surgery is struggling to find a new location and I have recently become aware that there may be the possibility of using the current site of Teddington Police station as a new location for the Surgery. From the perspective of serving the local community I can think of few better uses for the site of Teddington Police station than providing a new location for Park Road surgery.	See response to comment 307 in relation to Park Road Surgery.

			The Police station is just across the road from the Surgery's current location which has significant advantages in terms of continuity of service and the potential to build a modern purpose built premises. For those reasons I strongly believe the council's local plan should support the relocation of Park Road Surgery to the site currently used by Teddington Police station, and that any planning permission granted to the site should be conditional on the Surgery moving to that site.	
382	James Tullo	I am commenting on site allocation 9, Teddington Police Station within Section 7	In order that Richmond's overall strategic objectives are supported there needs to be good provision of health care. Currently the limitations of Park Road Surgery's accommodation prevents this. To achieve that I believe the Local Plan should require Park Road Surgery to be relocated to the Teddington Police Station site as part of any redevelopment. To ensure that happens any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery.	See response to comment 307 in relation to Park Road Surgery.
383	Sebastien Thelu	Site Allocation 9: Teddington Police Station, Park Road, Teddington (<i>this point also made on response form against the place-based strategies</i>)	I am commenting on site allocation 9, Teddington Police Station, to ask that: – the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment – any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery	See response to comment 307 in relation to Park Road Surgery.
384	Peter Heighes	Section 7, Site Allocation 9: Teddington Police Station, Park Road, Teddington	I am commenting on site allocation 9, Teddington Police Station, to ask that: – the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment – any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery.	See response to comment 307 in relation to Park Road Surgery.
385	Colin Clode	Section 7, Site Allocation 9: Teddington Police Station, Park Road, Teddington	I am commenting on section 7 of the plan Site allocation 9 Teddington Police Station to ask that the local plan requires Park Road Surgery to be relocated there as part of any redevelopment.	See response to comment 307 in relation to Park Road Surgery.
386	Neroli Tullo	I am commenting on site allocation 9, Teddington Police Station.	"I am commenting on site allocation 9, Teddington Police Station, to ask that: – the Local Plan should require Park Road Surgery to be relocated there as part of any redevelopment; this location is directly opposite the current premises and is much needed – any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery."	See response to comment 307 in relation to Park Road Surgery.
387	Michael Massey	Section 7, Site Allocation 9: Teddington Police Station, Park Road, Teddington	"I am commenting on site allocation 9, Teddington Police Station, to ask that: – the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment – any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery."	See response to comment 307 in relation to Park Road Surgery.
388	Rod Cowan	Paragraph 7.1, Site Allocation 9, Teddington Police Station, Park Road, Teddington	I request that - The Local Plan makes it a requirement that the existing Park Road Surgery is relocated to the site as part of any redevelopment, and - Planning consent makes the sale/lease of any residential units conditional upon the occupation of the GP Surgery.	See response to comment 307 in relation to Park Road Surgery.
389	Marrin Dawson	Section 7, Site Allocation 9: Teddington Police Station, Park Road, Teddington	"I am commenting on site allocation 9, Teddington Police Station, to ask that: – the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment as the current facilities are inadequate and not fit for purpose – any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery."	See response to comment 307 in relation to Park Road Surgery.
390	Sue Kidger	Paragraph 7.1, Site Allocation 9, Teddington Police Station, Park Road, Teddington	I request that - The Local Plan requires that the existing Park Road Surgery is relocated to the site as part of any redevelopment, and - Planning consent makes the sale/lease of any residential units conditional upon the occupation of the GP Surgery.	See response to comment 307 in relation to Park Road Surgery.
391	Mrs D Hudson	Site Allocation 9: Teddington Police Station, Park Road, Teddington	Due to the confines of their current premises in a house in Park Road and currently the gross lack of parking I am an advocate of them moving to the Teddington Police Station site in order they can improve on their services offered and it takes a busy Surgery off of a pretty Residential Road	See response to comment 307 in relation to Park Road Surgery.
392	Gerald Rowe	Section 7, Place-based Strategy for Teddington & Hampton Wick, Site Allocation 9: Teddington Police Station	Any planning consent makes the sale or lease of any residential units conditional upon a new GP Surgery to be established on the site.	See response to comment 307 in relation to Park Road Surgery.
393	Magda Rabenda	Site Allocation 9: Teddington Police Station, Park Road, Teddington	As a local resident and patient of Park Road GP Surgery Teddington. It is incredibly important that our surgery secures a site Please take note. "I am commenting on site allocation 9, Teddington Police Station, to ask that: – the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment – any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery."	See response to comment 307 in relation to Park Road Surgery.
394	Alan Roderick	Site Allocation 9: Teddington Police Station, Park Road, Teddington	I am commenting on site allocation 9, Teddington Police Station, to ask that: – the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment – any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery. – the Local Plan requires Park Road Surgery to be relocated to location on Park Road or to the east of it for the convenience of existing patients rather than moved to the Eastern End of Teddington	See response to comment 307 in relation to Park Road Surgery.
395	Stephen Croft	Section 7, Place-based Strategy for Teddington & Hampton Wick, Site Allocation 9: Teddington Police Station	I have been a patient at The Park Road Surgery opposite this site for more than 60 years and have seen the many changes in GP surgeries and the increasing demands on both the staff and premises. The current premises are unfit for purpose to meet these needs and those of it's patients. The surgery will have to move to meet the increasing demands on GP practices and the needs of it's patients, especially those with limited mobility and other additional needs. There are very few possible sites available in the area. I am aware that St Mary's hospital sports grounds site in Teddington was being considered but this is not so well served by public transport and is not as centrally located as the current premises nor as near to local long established pharmacies. The large site opposite, the former police station, was used by and for the protection of the local community. A significant part of the site should continue to be used for these purposes by relocating The Park Road surgery there.	See response to comment 307 in relation to Park Road Surgery.

			<p>Such use of the site would meet the key policies and strategies of the Council. It is a central location well served by public transport and within walking or cycling distance for most of its patients.</p> <p>Changes considered necessary: For the reasons given in 10 above and to comply with the Council's own policies and strategies:- Site 9 under paragraph 7 of the Place-based Strategy of the Local Plan should include the requirement for the relocation of The Park Road surgery to the site as part of any redevelopment. To ensure compliance with this, any planning consent granted must be conditional on the relocation of The Park Road surgery to the site with appropriate premises, ancillary services and amenities before any residential, commercial or other premises on the site are sold, leased or licensed for occupation.</p>	
396	Robin Legard	Site Allocation 9: Teddington Police Station, Park Road, Teddington	<p>I am answering this consultation as a long term patient of the Park Road Surgery. The current premises have been unfit for purpose since I have been attending the practice. What is needed is a much bigger premises which will allow such a large practice to provide the quality of care and range of services to its patients, including those with disabilities who must find it incredibly difficult to negotiate.</p> <p>The current location, in central Teddington, is very close to the station and buses so very accessible to local residents. The proximity of the Teddington Police Station to the current premises makes it an ideal site for the relocation of the practice in that it will combine the current accessibility with a purpose built surgery large enough and properly equipped to provide the health care that residents require.</p>	See response to comment 307 in relation to Park Road Surgery.
397	David Hayne	Site Allocation 9: Teddington Police Station, Park Road, Teddington	<p>"I am commenting on site allocation 9, Teddington Police Station, to ask that: – the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment – any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery."</p>	See response to comment 307 in relation to Park Road Surgery.
398	Graeme Fraser-Watson, The Teddington Society (Planning Group)	Teddington Police Station (Site Allocation 9 Teddington Police Station. Section 7 Place-based Strategy for Teddington & Hampton Wick).	We notice on the map that the Teddington Police Station site, as outlined in red, only covers a part of the site. Is there a reason for this ?.	See response to comment 307 in relation to Park Road Surgery.
399	Margaret Judith Davison	Site Allocation 9: Teddington Police Station, Park Road, Teddington	<p>I am commenting on site allocation 9, Teddington Police Station to ask that - the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment - any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery</p>	See response to comment 307 in relation to Park Road Surgery.
400	Laura and Nick Forrest	Section 7, Site Allocation 9: Teddington Police Station, Park Road, Teddington (<i>this point also made on response form against the place-based strategies</i>)	<p>I think this plan should ensure Park Road GP surgery is relocated to the site as part of any redevelopment to ensure use for the local community. Any planning consent should make the lease of any residential units conditional on the occupation of the GP surgery. The surgery desperately needs a new site suitable for those with disability, access issues, buggies etc and this is opposite the current GP surgery. As a parent and someone with chronic health issues I know that this GP surgery needs much better facilities to be able to expand and meet the needs of the local community.</p> <p>Changes consider necessary: Teddington can not support more housing developments without building its health service to serve new residents. The Park Road GP practice have been waiting for a suitable new site since 2010, when our 2nd baby was born. The existing building is operating to capacity with only a couple of clinic rooms on ground floor level. It's a nightmare carrying screaming babies and sick children upstairs, leaving buggies outside or blocking the waiting area or for those with mobility issues trying to get access and move. The practice accommodates about 10,000 more patients than the building should! The GP practice team are dedicated but need the right building to work in and to expand their services to meet local need. The Teddington police station site would be ideal and should still be at the heart of the community it serves, and can achieve this by being a new GP surgery on the ground level and residential units above. This would make a difference to local families like ours, plus have a knock-on effect on local services like walk-in services, demand in A+E etc and also allow for social care facilities to develop alongside health to improve community wellbeing.</p>	See response to comment 307 in relation to Park Road Surgery.
401	Lesley Redding	Site Allocation 9: Teddington Police Station, Park Road, Teddington	<p>I am commenting on site allocation 9, Teddington Police Station, to ask that: – the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment – any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery.</p>	See response to comment 307 in relation to Park Road Surgery.
402	Ann Cornick	Site Allocation 9: Teddington Police Station, Park Road, Teddington	<p>I am commenting on site allocation 9, Teddington Police Station to ask that: - the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment. - any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery.</p> <p>As a retired person who has a sight impairment, I walk to the Park Road Surgery. The premises are no longer fit for purpose and a new site needs to be found for the GPs surgery in the nearby vicinity.</p>	See response to comment 307 in relation to Park Road Surgery.
403	Michele Williams	Section 7, Site Allocation 9: Teddington Police Station, Park Road, Teddington	<p>I am commenting on site allocation 9, Teddington Police Station, to ask that: – the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment – any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery."</p> <p>The Park Lane surgery supports a large number of people locally and desperately needs more space. At a time when we should be looking to support local health services and the wide variety of services they should be providing to the community, I feel it is critical to ensure that space is provided in the ground floor of the police station opposite to allow these services to be provided in a cost effective & efficient manner.</p>	See response to comment 307 in relation to Park Road Surgery.
404	Patrick J Collins	Section 7, Site Allocation 9: Teddington Police Station, Park Road, Teddington	<p>"I am commenting on site allocation 9, Teddington Police Station, to ask that: – the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment – any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery."</p>	See response to comment 307 in relation to Park Road Surgery.

			<p>Securing a new surgery on this site would:</p> <ul style="list-style-type: none"> • significantly improve local residents' access to healthcare • support national policy, in particular the aims set out in the NHS Long-Term Plan to move care out of hospital and into the community • support the Teddington Village Plan • improve disabled access • support the strategic aim for social and community infrastructure and "flexible spaces[...]as part of multi-purpose assets" ("Securing new social and community infrastructure", draft Local Plan) <p>I would add that the site is a 15 minute walk from my house, and is also accessible via 3 bus routes. This compares favourably with other sites the surgery has considered for relocation.</p>	
405	Mark Yates	Site Allocation 9: Teddington Police Station, Park Road, Teddington	I am commenting on section 9 Teddington Police Station to ask that Park Road Surgery be relocated there as part of any redevelopment and that any planning consent makes the sale or lease of any residential units is conditional on the occupation of the GP surgery.	See response to comment 307 in relation to Park Road Surgery.
406	Johann Martin	Section 7, Site Allocation 9: Teddington Police Station, Park Road, Teddington	I am commenting on site allocation 9, Teddington Police Station, to ask that: – the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment – any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery.	See response to comment 307 in relation to Park Road Surgery.
407	Stella Mccusker	Section 7, Site Allocation 9: Teddington Police Station, Park Road, Teddington	I am commenting on site allocation 9 Teddington Police Station to ask the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment -any planning consent makes the sale or lease of any residential units conditional of the GP surgery.	See response to comment 307 in relation to Park Road Surgery.
408	Ann Sandford	Section 7, Site Allocation 9: Teddington Police Station, Park Road, Teddington	<p>I am a patient of the Park Road Surgery opposite this site. The current surgery premises are too small for the number of users and the growing demands placed on GP surgeries. They are unsuitable for patients with mobility and other special needs. However they are ideally located being central and well served by public transport meeting key parts of the Council's policies and strategies for it's community.</p> <p>The transfer of the surgery to the former police station site would solve the problems of the existing premises whilst maintaining the benefits.</p> <p>Changes considered necessary: Paragraph 7 of the Place-based Strategy, Site allocation no 9 Teddington Police Station Park Road Teddington of the Local Plan should include a requirement that The Park Road Surgery Teddington be relocated to the site as part of any redevelopment of the site. Further any planning consent granted shall be conditional on an appropriate part of the site to be used as a GP surgery with ancillary services and amenities.</p>	See response to comment 307 in relation to Park Road Surgery.
409	Wendy J Norman	Site Allocation 9: Teddington Police Station, Park Road, Teddington	<p>I strongly support the allocation of Site 9 for community/social infrastructure-led mixed use development.</p> <p>It is vitally important that sites for such uses are maintained as increased residential densities occur throughout the Borough and especially within Teddington. Once lost- these sites are very difficult to replace.</p> <p>In particular priority should be given within community/social infrastructure allocations and when planning applications are submitted, for essential health provision eg doctors practices. This is particularly pertinent in this instance where the Park Road Surgery has inadequate facilities, has long been looking for a new site and the police station site is opposite and perfectly suited for relocating a new GP practice use.</p>	See response to comment 307 in relation to Park Road Surgery.
410	Chris Whittome	Section 7, Place-based Strategy for Teddington & Hampton Wick, Site Allocation 9: Teddington Police Station, Park Road, Teddington (<i>this point also made on response form against the introduction, strategic vision, strategic objectives, Policies 1 and 2, and the place-based strategies</i>)	<p>For some years the Park Road Surgery has been seeking larger more suitable premises for the work they do, and could then do, to service the needs of the local population. This includes part of the Waldergrave Road site in which RHP are now located, and the plan for Udney Park Playing Fields which has been abandoned. This matter is urgent. With the withdrawal of the full function by the Met Police in Park Road it would seem sensible to strongly consider Park Road Surgery' s request for inclusion at that site. Please assess this request in your considerations.</p> <p>We live in [Teddington road name removed for data protection] and have till now founds our local Doctors Surgery to deliver good help when ever needed. As demand has grown on them they have outgrown their property with front door in Park Road and our household would welcome their transfer to a new location on the Teddington Met Police Station site.</p> <p>At 75 years of age, we are more vulnerable than when young. We welcome the idea of our effective local Doctor's Surgery being close at hand but they need a larger site as they develop more responsibilities to assist the NHS to be more efficient.</p> <p>A transfer of site for the Park Road Surgery to the Police site across the road would seem to be an excellent location for this busy effective Surgery.</p> <p>We would welcome a new facility for the Park Road Surgery if with sufficient space on the current Met Police station site when it is redeveloped. We would also welcome Police Presence fairly near at hand.</p>	See response to comment 307 in relation to Park Road Surgery.
411	Leslie Welch	Section 7, Site Allocation 9: Teddington Police Station, Park Road, Teddington	I would like to comment on Section 7 of the latest Local Plan with particular reference to Site Allocation 9, Teddington Police Station, and am requesting that the Plan should make adequate provision for the existing Park Road Surgery to be relocated on this site as part of any proposed redevelopment, and that any planning consent related to this site should require the sale or lease of any residential or commercial units to be made conditional on the allocation of sufficient space for occupation of by the GP surgery and other support health and social care facilities.	See response to comment 307 in relation to Park Road Surgery.
412	Eileen Folan	Section 7, Site Allocation 9: Teddington Police Station, Park Road, Teddington	I would like to add my support to the Park Road Surgery request that the relocation of the GP surgery should be made conditional to the sale of the police station. The council is aware that the surgery has to move and this relocation would cause	See response to comment 307 in relation to Park Road Surgery.

			<p>minimal disruption to the thousands of residents who currently use this surgery. It is an excellent group practice which has outgrown the current premises.</p> <p>The current reference in the local plan for Teddington is too vague to guarantee that our local GP service is prioritised. I have tried to respond using the consultation feedback but the form doesn't allow for specific issues unless all other questions are answered. It is too long and seems to have been designed to deter, rather than encourage, resident feedback.</p> <p>Very disappointed that the mayor of London has closed the police station, and would like to see some police office presence in Teddington - in library or maybe a small office in the existing building. Appreciate the reference to health or medical facilities on the ground floor but would like to see more explicit support for the relocation of the Park Road Surgery to the police station. They are in desperate need of new premises and these would be ideal. There would be minimal disruption to the thousands of people in Teddington who use this practice. The council should do everything in its power (and beyond) to ensure the developer works with Park Road Surgery to incorporate this essential resource in their plans. We are lucky to have such a good GP practice here.</p>	
413	David Cloke	Site Allocation 9: Teddington Police Station, Park Road, Teddington	<p>"I am commenting on site allocation 9, Teddington Police Station, to ask that:</p> <ul style="list-style-type: none"> – the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment. – any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery." 	See response to comment 307 in relation to Park Road Surgery.
414	Sally Serkovich	Section 7, Site Allocation 9: Teddington Police Station, Park Road, Teddington	<p>Unfortunately I am unable to download the Consultation Form or make a comment on the website as it seems to have frozen. I am therefore emailing independently.</p> <p>I wish to comment on Section 7 Site allocation 9, Teddington Police Station. I ask that the Local Plan requires Park Road Surgery (currently at 37 Park Road) to be relocated there as part of any redevelopment, and that any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery.</p>	See response to comment 307 in relation to Park Road Surgery.
415	Philip Tucker	Site Allocation 9: Teddington Police Station, Park Road, Teddington	<p>My representation concerns the relocation of the Park Road Surgery which is in nearby premises that are unsuitable for the needs of the practice's patients. The practice largely occupies what must have been a residential property which has been adapted. However, amongst many drawbacks, it is cramped and lacks suitable disabled access to the building itself and to the upper floor in particular. If the surgery had purpose built premises designed to suit the requirements of a modern community health hub of the type proposed for the failed Udney Park development, it could provide an enhanced range of services and improve the health outcomes of its patients and the wider community. For example, unlike Hampton Wick surgery, Park Road was unable to offer Covid vaccinations on site due to a lack of suitable facilities. Patients had to travel to the Greenwood Centre in Hampton Hill.</p> <p>I believe that there is a very strong case for incorporating a new, modern, purpose designed surgery within the redevelopment of Teddington Police Station to better serve the needs of the local community. To achieve this, I believe that any planning consent should make the sale or lease of any residential units conditional on the occupation of the GP surgery.</p> <p>This area has an abundance of overpriced and unsuitable accommodation, such as the redevelopment of the Thames TV studio site, and therefore I would contend that any residential units to be built alongside the surgery should be social housing. This would demonstrate that the council is able to put health, welfare and affordability ahead of any narrow profit motive.</p>	See response to comment 307 in relation to Park Road Surgery.
416	Vincent Gabbe, Knight Frank, on behalf of the Metropolitan Police Service	Site Allocation 9: Teddington Police Station, Park Road, Teddington	<p>Proposed Site Allocation 9 (Teddington Police Station) is highly unreasonable and inflexible in its requirements. In addition, inadequate justification is provided. There are two specific concerns.</p> <p>Firstly, the proposed allocation states at the third bullet under the context section that "proposed redevelopment of the site will only be acceptable if social / community infrastructure use is re-provided on the site at ground floor level". This statement is highly inflexible and runs contrary to proposed Policy 49 (Social and Community Use). It also runs contrary to social and community use policies across London. Such policies normally allow flexibility as to social and community infrastructure re-provision, taking into account the demand that exists at the time any planning application is made.</p> <p>Secondly, the seventh bullet states that "on this site, the Council is seeking a social infrastructure use and affordable housing, due to its prominent location and local needs". Again, this statement is highly inflexible and runs contrary to proposed Policy 49 (Social and Community Use). It is also inconsistent with other similar policies across London. What Policy 49 states is that, where 100% affordable housing is proposed, other social and community use re-provision will not be required. The proposed policy should not seek to limit potential uses for this site to just one outcome, particularly where the demand and viability for those proposed uses is unknown.</p> <p>In summary, Site Allocation 9 is inconsistent with proposed Policy 49 and applies an unreasonable and inflexible approach to Teddington Police Station. No adequate explanation is provided for this inconsistency.</p> <p>Proposed Site Allocation 9 should be amended to be consistent with Policy 49.</p> <p>The first sentence of the third bullet of the 'context' section in Site Allocation 9 should be re-worded as follows: "Proposed redevelopment of the site should include social / community infrastructure use at ground floor level, subject to the available demand for such uses. If the ground floor cannot be utilised for social / community use, a detailed case will need to be set out providing reasoning for this, in accordance with Policy 49."</p> <p>The seventh bullet should be amended to state the following: "In accordance with Policy 49 (Social and Community Infrastructure), where a scheme proposes 100% genuinely affordable housing and meets the requirements of Policy 11 (Affordable Housing) in terms of mix, tenure and affordability, the proposals will not be required to provide other social and community infrastructure.</p>	<p>Whilst a police station falls within a Sui Generis Use Class, it is still considered to be a community/social infrastructure, thus it is considered to be reasonable and justifiable to include the re-provision of a community/social use on site. Should there be no demand for a social/community use / end-user, subject to this being demonstrated via robust evidence, there is sufficient flexibility within Policy 49 to allow for alternative uses. Thus it is not considered that the Site Allocation requirements prevent the site from coming forward for redevelopment. The policy wording is therefore considered appropriate.</p> <p>The Site Allocation makes clear that, as per Policy 49, where 100% affordable housing is proposed, there is not a requirement to provide the social/community use. No changes are necessary.</p>
417	Paul Barker	Section 7, Place-based Strategy for Teddington & Hampton Wick, Site Allocation 9: Teddington Police Station	<p>"I am commenting on site allocation 9, Teddington Police Station, to ask that:</p> <ul style="list-style-type: none"> – the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment – any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery." 	See response to comment 307 in relation to Park Road Surgery.

418	Paul Hargraves	Site Allocation 9: Teddington Police Station, Park Road, Teddington	It is a golden opportunity to relocate Teddington Park Road Surgery to close by in the Police Station to be removed on Park Road. It will serve the same people in the same area. There is ample space to provide all the facilities the surgery requires. Alternative sites would be too far away, making it difficult for its patients to use.	See response to comment 307 in relation to Park Road Surgery.
419	Larissa Suchecka	Site Allocation 9: Teddington Police Station, Park Road, Teddington	I am commenting on site allocation 9, Teddington Police Station, to ask that: – the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment – any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery.	See response to comment 307 in relation to Park Road Surgery.
420	Joanna Sowell	Site Allocation 9: Teddington Police Station, Park Road, Teddington	It is a golden opportunity to relocate Teddington Park Road Surgery to close by in the Police Station to be removed on Park Road. It will serve the same people in the same area. There is ample space to provide all the facilities the surgery requires. Alternative sites would be too far away, making it difficult for its patients to use.	See response to comment 307 in relation to Park Road Surgery.
421	David Marlow	Site Allocation 9: Teddington Police Station, Park Road, Teddington	P56 (Site 9). I support Doctor's Surgery at Teddington Police Station site.	See response to comment 307 in relation to Park Road Surgery.
422	Emma Dobson	Site Allocation 9: Teddington Police Station, Park Road, Teddington	I am commenting on site allocation 9, Teddington Police Station, to ask that the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment.	See response to comment 307 in relation to Park Road Surgery.
423	Andrea Legrand	Site Allocation 9: Teddington Police Station, Park Road, Teddington	I am commenting on site allocation 9, Teddington Police Station, to request that: – the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment – any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery The surgery serves a large proportion of the TEDDINGTON population and has been remarkable in its delivery of services throughout the pandemic. I have been a patient (& my family) for over 30years since moving here as a student. It is a part of the fabric of our community and as numbers in the area have grown, so too has the requirement for GP services. A move to this site would ensure more residents could be served and better services could be provided on site thereby helping NHS budgets as well as patients.	See response to comment 307 in relation to Park Road Surgery.
424	John Jenkins	Site Allocation 9: Teddington Police Station, Park Road, Teddington	I wish to give my support to Park Road Surgery and their objective to secure a much needed relocation to the new development of Teddington Police station. The existing surgery has outlived its usefulness. It is totally inaccessible for many especially those who are disabled. The surgery desperately needs a contemporary surgery which addresses the needs of all of its patients. This site is a perfect location for them and I support their application totally.	See response to comment 307 in relation to Park Road Surgery.
425	Jean Carlin	Site Allocation 9: Teddington Police Station, Park Road, Teddington	I think it's a great plan to take over all or part if Teddington Police Station for Park Road Surgery. The surgery is in need of more space to do more things. . Having the surgery in a house so old fashioned it's not good having a staircase to walk up and down especially for old people and mothers with children. The new premises they will be able to do much more for the patients instead of having to send them to the hospital for minor things. The staff deserve better working facilities I guess above will be turned into flats that will make more revenue. Car parking space for Doctors and ambulances when required. Outside a bus stop it has a lot going for it. Near the chemist. It will be so great for the community. Let's hope it gets approved.	See response to comment 307 in relation to Park Road Surgery.
426	John Miln	I am referring to Section 7 - Site allocation 9	I am commenting on Site Allocation 9, Teddington Police Station, to ask that: - the local plan requires that Park Road Surgery to be relocated there as part of any redevelopment. - any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP Surgery.	See response to comment 307 in relation to Park Road Surgery.
427	Mr & Mrs Shanks	Site Allocation 9: Teddington Police Station, Park Road, Teddington	We are commenting on site allocation 9, Teddington Police Station, to ask that: * the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment * any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery.	See response to comment 307 in relation to Park Road Surgery.
428	Jim Brockbank	My detailed response relates to section 7 of the local plan, specifically site allocation 9, Teddington Police Station.	This is a significant community asset in Teddington and an opportunity not to be missed to meet the needs of affordable housing, social care, and primary healthcare in the locality. The Park Road Surgery is a long established teaching practice which in 1979 had 2 partners and 5000 patients, it now has 5 partners, salaried GPs, nurses and a management and reception team, and serves a population of 13,000 from the same building. This building is no longer 'fit for purpose' and this has been recognised by the CCG and the NHS for more than 10 years but as the local plan has recognised, opportunities to relocate are rare. A new GP surgery on the Teddington Police Station site is no less than the people of Teddington deserve, and the staff at the surgery also, who have coped with inadequate premises over such a long period of time. This 'fits' with the NHS long term plan for care in the community, and the local plan strategic aim for social and community infrastructure and the development of multi-purpose assets. Since the pandemic the importance of health, wellbeing and community has been at the forefront of new development and the plan recognises the importance of wellness and fitness as a priority. This is in stark contrast to GP Premises that for more than 10 years have been recognised as not fit for purpose. I strongly support that The Park Road Surgery Teddington be included in any redevelopment of Teddington Police Station	See response to comment 307 in relation to Park Road Surgery.
429	Jane Cliff	Site Allocation 9: Teddington Police Station, Park Road, Teddington	This surgery is no longer fit for purpose. I request that a new surgery be integrated into any plan for the development of the police station. I am registered with this surgery.	See response to comment 307 in relation to Park Road Surgery.
430	Hilary and Chris Gooch	Site Allocation 9: Teddington Police Station, Park Road, Teddington	We wish to comment on the place of the Teddington Police station within the local plan. The local plan needs to include the relocation/development of Park Road Surgery on this site. The current accommodation is totally inadequate for current local health care provision. Inclusion in any development on the Police station site will keep the surgery close to its current location an advantage for their patients.	See response to comment 307 in relation to Park Road Surgery.
431	Ken Ward	Site Allocation 9: Teddington Police Station, Park Road, Teddington	I am writing to comment on section 7 of the plan, with specific reference to site allocation 9, Teddington Police Station. I would ask that: -the Local Plan requires that Park Road Surgery be relocated to the site of the police station as part of any redevelopment;	See response to comment 307 in relation to Park Road Surgery.

			-any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery.	
432	John and June Demont	Site Allocation 9: Teddington Police Station, Park Road, Teddington	We are writing in support of the application by Park Road Surgery, Teddington to secure premises in the development of Teddington Police Station. The current premises in Park Road have become totally inadequate to meet the needs of this busy surgery. When we joined the two doctor practice 40 years ago the range of services was far more limited and the practice today really struggles to provide accessible consulting rooms to cope with the numbers of patients registered at the surgery and the range of services that they offer. The fact they cope as well as they do is a great tribute to the dedication of both medical and administrative staff. To move just across the road would be the perfect solution to the problem and one which it is in your power to provide. I urge you to look upon this application as one which would be of huge benefit to a large number of Teddington residents and would enable the wonderful team of Doctors and administrative staff to carry out their jobs in a much more satisfactory way, benefitting both them and their patients.	See response to comment 307 in relation to Park Road Surgery.
433	Denise July	Site Allocation 9: Teddington Police Station, Park Road, Teddington	I am responding to the Local Richmond upon Thames Consultation Plan, specifically site allocation 9, Teddington Police Station to ask that: - the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment - any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery. I have been a patient of this surgery for 30 years and we desperately need a new site.	See response to comment 307 in relation to Park Road Surgery.
434	Victoria Little	Site Allocation 9: Teddington Police Station, Park Road, Teddington	I would like to add my support for the relocation of Park Road Surgery to the site of Teddington Police Station. This would be an excellent solution for its relocation, just across the road from its current premises. Park Road surgery is a very important part of the immediate community and this would represent an excellent solution.	See response to comment 307 in relation to Park Road Surgery.
435	Lynda Norman	Site Allocation 9: Teddington Police Station, Park Road, Teddington	I am commenting on site allocation 9, Teddington Police Station, to ask that: - the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment - any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP Surgery	See response to comment 307 in relation to Park Road Surgery.
436	Michael and Jackie Perry	Site Allocation 9: Teddington Police Station, Park Road, Teddington	I and my wife are writing to register our strong support for the Park Road Surgery being relocated in the Park Road Police Station. We are elderly patients, registered with the surgery, and live in [Teddington road name removed for data protection] . The relocation would mean the least possible interference with their excellent services.	See response to comment 307 in relation to Park Road Surgery.
437	Stella Smith	Site Allocation 9: Teddington Police Station, Park Road, Teddington	I am responding to Section 7 of the Plan and specifically to Site Allocation 9 development of Teddington Police station. The Local Plan should require that Park Road Surgery be relocated there as part of any future development. They are currently operating in a building that was for 3000 patients and they are now trying to manage over 10,000 patients there. The new development must accommodate social and community use and especially to include Teddington Park Road Surgery who have long outgrown their building and are struggling to provide a satisfactory medical service to the local community. Any planning consent must make the sale or lease of any residential units conditional on the occupation of the site by the Park Road GP surgery.	See response to comment 307 in relation to Park Road Surgery.
438	John Blackwell	Site Allocation 9: Teddington Police Station, Park Road, Teddington	I would totally support any plans for the existing Park Road Surgery to be incorporated into any proposed development of Teddington Police Station	See response to comment 307 in relation to Park Road Surgery.
439	Nicole Davies	Site Allocation 9: Teddington Police Station, Park Road, Teddington	I fully support a new GP surgery for Park Road as part of the redevelopment of Teddington Police Station. This would be an excellent site, very central and reasonably close to bus stops in Broad Street.	See response to comment 307 in relation to Park Road Surgery.
440	Amanda Root	Site Allocation 9: Teddington Police Station, Park Road, Teddington	I am aware that for many years the Park Road Surgery has been seeking larger more suitable premises for the work they do, and could perhaps expand to do for the local community. With the withdrawal of the full function by the Met Police in Park Road it would seem sensible to strongly consider Park Road Surgery' s request for inclusion at that site.	See response to comment 307 in relation to Park Road Surgery.
441	Patty Lloyd	Site Allocation 9: Teddington Police Station, Park Road, Teddington	Park Road Surgery is an NHS GP surgery which looks after just over 13,000 patients across a catchment area which includes the Teddington ward and part or all of the five neighbouring wards of Fulwell & Hampton Hill, Hampton, Hampton Wick, South Twickenham, and West Twickenham. Our existing premises is a converted Victorian house which should let us look after about 3,400 patients, meaning we are accommodating about 10,000 more patients than the building should; this is the highest number of excess patients for any surgery in the borough, and our urgent need to move premises is recognised in that we are top priority in the Richmond CCG Estates Strategy. We would therefore ask that Site Allocation 9 specifies that this medical need must be met as part of any redevelopment of the Police Station, in line with the existing text which says that "proposed redevelopment of the site will only be acceptable if a community/social infrastructure use is re-provided on site at ground floor level, such as for a medical/health use." We also call for the site allocation to be more specific about the need for a co-located health and social care facility, combining our need with space for local charities and a shared community space for health and wellbeing. This matters because the Teddington Police Station is a large community asset in the centre of Teddington, and because ongoing residential development without corresponding healthcare development increases the pressures GP surgeries are under, and worsen the service available to patients. Park Road Surgery's existing building is operating at capacity all the time, with nowhere physically to put more staff to answer the phones or to see patients, nor to cope with spikes in demand like winter pressures. Physical access is terrible, particularly for those with buggies, or mobility difficulties, and half the consulting rooms are on the first floor.	See response to comment 307 in relation to Park Road Surgery.
442	Trish Harle	Site Allocation 9: Teddington Police Station, Park Road, Teddington	Park road surgery is in need of new premises. The existing surgery is now inadequate for patients with buggies and the disabled. The Teddington police station is a perfect choice for good transport links for those patients able to use them.	See response to comment 307 in relation to Park Road Surgery.
443	Vin Chauhan	Site Allocation 9: Teddington Police Station, Park Road, Teddington	As the Park Road Surgery has been looking for larger premises for a number of years this Police Station site in Teddington would be the ideal site.	See response to comment 307 in relation to Park Road Surgery.

			The Park Road Surgery is just about coping with the large number of patients and I feel the Teddington Police site is a right place for it. It would seem sensible to consider Park Road Surgery's request for inclusion at that site.	
444	Felicity Jackson	Site Allocation 9: Teddington Police Station, Park Road, Teddington	As you are aware, Park Road Surgery has been overwhelmed by the ever increasing number of patients on its books, so has been seeking more suitable premises. It would seem sensible to allocate the former Teddington Police Station property to them to develop into a facility that is appropriate for the community and which anticipates future requirements (and in conjunction with other community needs). However, what is planned is very unclear on the Richmond Planning website. The plans need to be clarified and there should be a public consultation. Communication is very poor on this proposal. On the face of it, the site would be ideal for Park Road Surgery.	See response to comment 307 in relation to Park Road Surgery.
445	Eve Whitby	Site Allocation 9: Teddington Police Station, Park Road, Teddington	Help Park Road Surgery relocate to site of Police Station. I would like to state that Park Road surgery would benefit by relocating to Police station site as it is very near for the patients to access easily with a few parking spaces. There would be more room for the doctors to work and would free up the doctors site for extra housing in the area.	See response to comment 307 in relation to Park Road Surgery.
446	Jennie Gower-Smith	Site Allocation 9: Teddington Police Station, Park Road, Teddington.	Please take this email as local resident support for the inclusion of a gp surgery in the redevelopment of the Teddington Police station site. I live on [Teddington road name removed for data protection] and the doctors surgery is vital to local residents and a close relocation would be a huge advantage. The site should not be used for purely commercial private development but rather an appropriate use of facilities in the heart of Teddington.	See response to comment 307 in relation to Park Road Surgery.
447	Tove Smith	Site Allocation 9: Teddington Police Station, Park Road, Teddington	I fully support the application from Park Road Surgery in Teddington to relocate to Teddington Police Station premises in Park Road. I am a Teddington resident and registered with Park Road Surgery.	See response to comment 307 in relation to Park Road Surgery.
448	Chrissie Wrench	Site Allocation 9: Teddington Police Station, Park Road, Teddington	Residents need Park Road Surgery to get planning permission to relocate to the Teddington Police Station. The whole community would benefit from this move to larger premises. Offering extensive servicesz	See response to comment 307 in relation to Park Road Surgery.
449	Bartle Smith Smudge	Site Allocation 9: Teddington Police Station, Park Road, Teddington	I believe that there should be a gp surgery in the Teddington police station site it would improve access for elderly and physically impaired patients and help the surgery to accommodate a growing local population	See response to comment 307 in relation to Park Road Surgery.
450	Lauren Bloch	Site Allocation 9: Teddington Police Station, Park Road, Teddington	I am commenting on site allocation 9, Teddington Police Station to ask that: - the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment - any planning consent makes the sale of lease of any residential units conditional on the occupation of the GP surgery.	See response to comment 307 in relation to Park Road Surgery.
451	Caryn Jenner	Section 7, Site Allocation 9, Teddington Police Station	Re Teddington Police Station, Park Road, Teddington I believe that it is crucial for ground floor space in the redeveloped police station to be allocated to a GP surgery. Specifically, the Park Road Surgery has been in need of more space for some time to look after its 13,000 local patients and the redeveloped police station across the street from the surgery would provide the ideal location.	See response to comment 307 in relation to Park Road Surgery.
452	Gemma Johnson	Site Allocation 9: Teddington Police Station, Park Road, Teddington	I would like to add my support to a new Park Road surgery as part of the redevelopment of Teddington police station.	See response to comment 307 in relation to Park Road Surgery.
453	Rob Mitchener	Site Allocation 9: Teddington Police Station, Park Road, Teddington	Teddington Police Station re development. I support the use of this facility for in part new premises for Park Road Doctors Surgery. A new and much needed bespoke facility could be created in the redevelopment of the Police Station. A new facility at Udney Park Road didn't happen the location is perfect for a community facility just across the road from the current surgery. Please incorporate this change.	See response to comment 307 in relation to Park Road Surgery.
454	Jane Sweetman	Site Allocation 9: Teddington Police Station, Park Road, Teddington	I am writing in connection with the Local Plan consultation, specifically on site allocation 9 for Teddington Police Station. I am asking that the Local Plan requires the site be allocated for social infrastructure use and that Park Road Surgery be relocated to the site as part of any redevelopment and that any planning consent makes the sale or lease of any residential units on this site conditional on the occupation of the GP surgery.	See response to comment 307 in relation to Park Road Surgery.
455	Liz Waters	Section 7, Site Allocation 9: Teddington Police Station, Park Road, Teddington	There is an urgent need in Teddington to ensure the local community is adequately provisioned with GP services. The Park Rd Surgery needs to be supported in moving to larger, more suitable premises such as on the Police Station site. Any planning consent for this site should make the sale or lease of any new residential units on the site conditional on a replacement GP surgery being provided.	See response to comment 307 in relation to Park Road Surgery.
456	Michael Whitham	Site Allocation 9: Teddington Police Station, Park Road, Teddington	I am commenting on site allocation 9, Teddington Police Station, to ask that: - the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment - any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery."	See response to comment 307 in relation to Park Road Surgery.
457	Wendy Whitham	Site Allocation 9: Teddington Police Station, Park Road, Teddington	I am commenting on site allocation 9, Teddington Police Station, to ask that: - the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment - any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery."	See response to comment 307 in relation to Park Road Surgery.
458	Michael Cole	Site Allocation 9: Teddington Police Station, Park Road, Teddington	I am writing to express my support for the bid by The Park Road Surgery to move into the Teddington police station, once developed. Due to the fact that the current building is now far too small for the surgery, it being oversubscribed by approximately 10000 patients, there is urgent need for much more space. Indeed, since we can expect the local population to increase, the situation can only worsen. The current access to the various examining rooms is extremely difficult for all but the fit and youthful. By contrast, the police station building seems much more suitable. It has an easy access and a large ground floor footprint with disabled parking readily available. Also, since some patients are from Fulwell, Hampton, Twickenham and Hampton Wick the proximity to Teddington Railway Station and various bus routes, a few hundred yards away will maintain a desirable connection.	See response to comment 307 in relation to Park Road Surgery.

			The location is, without a doubt, highly suitable, since it already is the site of a public service organization, so will have little negative impact on local residents.	
459	Elizabeth, Seymour and Joshua Kelly	Site Allocation 9: Teddington Police Station, Park Road, Teddington	We support the Park Road GP Surgery moving into premises on the old police station site opposite. Should be grateful if you would register our support for this.	See response to comment 307 in relation to Park Road Surgery.
460	Peter Vincent	Section 7, Site Allocation 9: Teddington Police Station, Park Road, Teddington	I am a resident of [Teddington address details removed for data protection] and a patient of Park Road Surgery and would like to voice my option that in the site allocation I would like Park road surgery be included in any redevelopment . I am commenting on site allocation 9 Teddington police station . In that that the local plan requires park road surgery to be relocated ,there as part of any redevelopment. And any planning consent to make the sale or lease of any residential units conditional on the occupation of the surgery.	See response to comment 307 in relation to Park Road Surgery.
461	Barbara Egan	Site Allocation 9: Teddington Police Station, Park Road, Teddington	I am very keen for Park Road Surgery to be relocated to the Teddington Police Station site (site allocation 9). I am 86 and have difficulty accessing the upstairs rooms of the current Surgery. The current building is too small and new premises are urgently needed. I ask in the strongest terms that Park Road Surgery should be relocated to the Police Station site as part of any redevelopment. In addition, any planning consent given must make the sale or lease of any residential units conditional on the occupation by the GP surgery.	See response to comment 307 in relation to Park Road Surgery.
462	Joyce Smith	Site Allocation 9: Teddington Police Station, Park Road, Teddington	I ask that the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment, and that any planning consent makes the sale or lease of any residential units conditional on occupation by the Park Road GP Surgery.	See response to comment 307 in relation to Park Road Surgery.
463	Theodore Serkovich	Site Allocation 9 Teddington Police Station, Park Road, Teddington	I am commenting on site allocation 9, Teddington Police Station, to ask that: the Local Plan requires Park Road Surgery, currently based at 37 Park Road Teddington, to be relocated there as part of any redevelopment - any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery.	See response to comment 307 in relation to Park Road Surgery.
464	Kathleen Barnes	Site Allocation 9: Teddington Police Station, Park Road, Teddington	I would like to comment on this. Whilst I would support a move by the local GP surgery at Park Road (where I am a patient) to a new modern site across the road this must be adequate for all its NHS requirements and current and future needs and fit in with extant local planning guidance for the site which I understand is for Community Use with any residential use being additional to that and also in line with policy (notably affordable housing).	See response to comment 307 in relation to Park Road Surgery.
465	Sue Ford	Section 7, Site Allocation 9: Teddington Police Station, Park Road, Teddington	I am commenting on site allocation 9, Teddington Police Station to ask that: - The Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment - Any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery	See response to comment 307 in relation to Park Road Surgery.
466	Sadie Green	Site Allocation 9: Teddington Police Station, Park Road, Teddington	I have only just heard about the proposal to move Park Road Surgery to the old Police Station site. This is the first I have heard that this whole consultation is even happening. I would like to support the move but I have not been able to read about the proposal in detail to see what the wheelchair access will be like. I am a frequent user of Park Rd and I attend in my wheelchair.	See response to comment 307 in relation to Park Road Surgery.
467	Zoe Ide	Section 7, Site Allocation 9: Teddington Police Station, Park Road, Teddington	Welcome the inclusion of Health Centre wording however think this should be a mandatory requirement for any developers and would suggest that Park Road Surgery who has been looking for a new home for 10 years and be specifically supported to relocate. They are currently catering for 10.000 patients more than their current building should.	See response to comment 307 in relation to Park Road Surgery.
468	Kerry Chauhan	Site Allocation 9: Teddington Police Station, Park Road, Teddington	I support this application. The local population has increased and the present surgery is too small to provide the necessary facilities. The site of the Park Road police station is ideal.	See response to comment 307 in relation to Park Road Surgery.
469	Andrew Norman	Place-based Strategy for Teddington & Hampton Wick, Site Allocation 9: Teddington Police Station, Park Road, Teddington	I support the proposal to re-provide a community/social infrastructure use at Ground floor within any proposed redevelopment of this site. This should be as a replacement for the Park Road Doctors practice where there is already a proven need to find alternative modern accommodation. This site would enable the practice to continue to operate in the same part of Teddington serving the nearby local residents. I also support the proposal for 100% genuinely affordable housing to be provided. As a site in the centre of Teddington this would allow very good access to transport facilities for the residents.	See response to comment 307 in relation to Park Road Surgery.
470	Mr & Mrs S Drudge	Site Allocation 9: Teddington Police Station, Park Road, Teddington	The opportunity should be taken to enhance the local medical facilities of the Town by incorporating the existing Park Road medical practice into the proposals for the Police Station Development, thus allowing potential expansion opportunities to suit the future needs of the local community.	See response to comment 307 in relation to Park Road Surgery.
471	Matt Allchurch	Site Allocation 9: Teddington Police Station, Park Road, Teddington	"I am commenting on site allocation 9, Teddington Police Station, to ask that: - the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment - any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery."	See response to comment 307 in relation to Park Road Surgery.
472	Mark Newman	Site Allocation 9: Teddington Police Station, Park Road, Teddington	"I am commenting on site allocation 9, Teddington Police Station, to ask that: - the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment - any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery."	See response to comment 307 in relation to Park Road Surgery.
473	Catherine Thomas and Valentin Andreev	Site Allocation 9: Teddington Police Station, Park Road, Teddington	I wish to support The Park Road GP Surgery in Teddington with their wish to relocate to the former Teddington Police Station redevelopment. I would also like to reiterate their wishes that: - the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment. -any planning consent makes the sale or lease of any residential units conditional on occupation of the GP Surgery.	See response to comment 307 in relation to Park Road Surgery.
474	Andy Hale	Site Allocation 9: Teddington Police Station, Park Road, Teddington	I am commenting on [Teddington Police Station Site]. Teddington continues to benefit from infilling to provide additional housing. However, to support the population growth it needs proper infrastructure, such as medical facilities. The site, if no longer required for police facilities, should be kept for community purposes only. No residential development should be allowed.	See response to comment 307 in relation to Park Road Surgery.
475	Kevin Curtin	Site Allocation 9: Teddington Police Station, Park Road, Teddington	I have been a resident of Teddington in the wonderful borough of Richmond for over 25 years and been a patient at the excellent Park Road Surgery throughout that time requiring their help for me and my family on numerous occasions. I am contacting you	See response to comment 307 in relation to Park Road Surgery.

			re. Site Allocation 9 – Teddington Police Station which would be the ideal site for the Surgery to accommodate all the thousands of their patients, to extend the facilities and services which they offer, to improve access for disabled patients and to enhance the quality of life for the whole community.	
476	Carolyn Doughty	Site Allocation 9: Teddington Police Station, Park Road, Teddington	I feel very strongly that adequate space should be allocated for the relocation of Park Road Surgery on the ground floor of any future building. They are an excellent practice serving thousands of local people. Their current building is no longer fit for purpose and the proposed move to Udney Park was rejected.	See response to comment 307 in relation to Park Road Surgery.
477	Sharon Newman	Site Allocation 9	I am commenting on site allocation 9, Teddington Police Station, to ask that: – the Local Plan requires Park Road Surgery to be relocated there as part of any redevelopment – any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery.	See response to comment 307 in relation to Park Road Surgery.
478	Judith Rutherford	Site Allocation 9: Teddington Police Station, Park Road, Teddington	As a patient of Park Road Surgery and a local resident, I wish to offer support for any plans for the redevelopment of Teddington Police Station to include appropriate accommodation for Park Road Surgery.	See response to comment 307 in relation to Park Road Surgery.
479	Judith Heyworth	Site Allocation 9: Teddington Police Station, Park Road, Teddington	I have lived in Teddington in the wonderful borough of Richmond for over 45 years. Throughout those years I have regularly used the excellent Park Road Surgery for all members of my family, children and now grandchildren. I would like to support the use of Teddington Police Station to enable the expansion of the Park Road Surgery to cope better with all its thousands of patients. They will be able to extend their services and facilities, including improved access for the disabled.	See response to comment 307 in relation to Park Road Surgery.
480	Emma Durnford	Section 7, Place-based Strategy for Teddington & Hampton Wick, Site Allocation 9: Teddington Police Station, Park Road, Teddington	I am writing to register my views on the LBRUT proposal for the future of Teddington and in particular the redevelopment of the old Teddington Police Station site on Park Road, Teddington. Unfortunately the downloadable form and the online portal is ambiguous and overly complicated. With this in mind, in the interests of fairness, I would like you to include my comments below. I am commenting on SECTION 7 - SITE ALLOCATION 9, Teddington Police Station , to ask that: - the Local Plan REQUIRES Park Road Surgery to be relocated there as part of any redevelopment; - any planning consent makes the sale or lease of any residential units CONDITIONAL ON THE OCCUPATION OF THE THE GP SURGERY I have been a patient at Park Road Surgery since I moved to the Borough in 2003. We are fortunate to have this surgery and the excellent Doctors, nurses and team. However, the current location in a converted residential house has clearly identifiable limitations on accessibility for those with differing physical needs or parents/guardians bringing young children for appointments. Space is limited in the waiting area and direct access between the consultation rooms on the upper floor and reception area could be potentially difficult for both patients and staff. Taking the considerations above into account, the inclusion of a specifically designed space for the Park Road Practice in any new development on the site of the old Police Station is essential to the local community.	See response to comment 307 in relation to Park Road Surgery.
481	F A Rowbotham	Section 7, Site Allocation 9: Teddington Police Station, Park Road, Teddington	As encouraged by the Park Road Surgery, 37 Park Road, Teddington, Middlesex, TW11 ... as a Patient and as a nearby Resident (<i>rather elderly</i>) I have tried <i>very hard</i> to make the relevant comments about the Teddington Police Station, which needs to be sent in by Today . I completed your relevant Form, Section 7. Site Allocation 9., but was unable to master how to Email it to yourselves. Therefore I am trying to do it this way. Could you please register on the suggested relevant Planning Forms that I wish to support The Park Road Surgery, Teddington, in their website comments?	See response to comment 307 in relation to Park Road Surgery.
482	Barbara Fryatt	Site Allocation 9: Teddington Police Station, Park Road, Teddington	We support a move to police station site	See response to comment 307 in relation to Park Road Surgery.
483	John Sheppard	Site Allocation 9: Teddington Police Station, Park Road, Teddington	I write with regard to the suggested plan to move and create a new surgery at the old and currently mostly vacant Teddington Police Station. I think that the plan is ideal – the site is perfect and I am wholly supportive – the access it will continue to provide to nearby public service facilities i.e. both bus and rail adds to its attraction – it is also much larger than our current surgery in a converted residential house and will therefore provide for greater opportunity to both extend and improve health and safety services in Teddington.	See response to comment 307 in relation to Park Road Surgery.
484	Kenneth Howe	Site Allocation 9: Teddington Police Station, Park Road, Teddington	I am commenting on site allocation 9. Teddington Police Station to ask that: The Local plan requires Park Road Surgery be relocated there as part of any redevelopment - any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery.	See response to comment 307 in relation to Park Road Surgery.
485	MA & JA Byrne	Site Allocation 9: Teddington Police Station, Park Road, Teddington	As local residents and local business owners , as well as patients of the excellent Park Road Surgery, we would like to state the following: We are commenting on site allocation 9: Teddington Police Station, to ask that the local plan REQUIRE Park Road Surgery to be relocated there as part of any development and specifically, that any sale or lease of any residential units are conditional of the occupation of a GP Surgery. Please can you kindly acknowledge receipt of this email as it is so important that the surgery is able to expand into that site to fulfil the needs of existing and future patients. The current site is too small and for current requirements and the above would be a considerable benefit to patients and the Borough and very much meets the criteria required as part of the consultation.	See response to comment 307 in relation to Park Road Surgery.
486	Karen L Kirkham	Section 7, Site Allocation 9: Teddington Police Station, Park Road, Teddington	Section 7 Site Allocation 9 Teddington Police Station please ensure that the local plan requires Park Road Surgery to be relocated to the site and that this is a condition of the sale or lease of any residential units	See response to comment 307 in relation to Park Road Surgery.
487	K Peachey	Para 7.1, Site allocation 9: Teddington Police Station	I fully support retention of the OOLTI of this site. Its loss would be detrimental to local residents, giving a more concrete jungle flavour to this part of Teddington. Being able to see OOLTIs is a positive input into the mental health of residents. I think that relocation of Park Road Doctor's Surgery to the Teddington Police Station site should be integral to any approved development of that site. Teddington Police Station was a community asset and the site should continue to support the local community, if not with police premises then with our local Doctors' surgery because they need to relocate to an area accessible to their existing patients.	See response to comment 307 in relation to Park Road Surgery.

488	Alan Smith	Section 7, Site Allocation 9: Teddington Police Station, Park Road, Teddington (<i>this point also made on response form against the place-based strategies</i>)	<p>I comment specifically on Section 7 / Site Allocation 09 - Teddington Police Station.</p> <p>I agree its location & position supports a new use NOT directly linked to retail / commercial / trading.</p> <p>The noted preference for community / social infrastructure is logical. When linked to existing transport and infrastructure services this would form a natural new use that should be consistent with other related proposed strategies & policies such as 20 min neighbourhood concepts etc.</p> <p>The draft suggests possible shared use in any future redevelopment. The combination of residential / affordable housing above ground floor with medical / health use only at ground floor should be reviewed.</p> <p>Significant community / social infrastructure benefits could be available and viable if this site were to be preferred for sole medical / health use to address the longstanding shortage and underprovision of modern primarycare integrated facilities. Any final version of this "draft local plan" should review and reconsider the proposed shared uses to enable and allow this particular site (09) to be zoned to require</p> <ul style="list-style-type: none"> – the Park Road Surgery to be relocated there as part of any redevelopment – any planning consent that even considers or makes the sale or lease of any residential units conditional on the occupation of a modern multi-facility GP surgery adequate to provide full primary and related healthcare services to the size and requirements of the totality of its GP practice patients. 	See response to comment 307 in relation to Park Road Surgery.
489	Alan Smith	Site Allocation 9: Teddington Police Station, Park Road, Teddington	I fully support the plans to relocate Park Road Surgery to the old Teddington Police station building. I am a Teddington resident and live in [Teddington address details removed for data protection] .	See response to comment 307 in relation to Park Road Surgery.
490	Jeremy Smithers	Site Allocation 9: Teddington Police Station, Park Road, Teddington	I and my wife have lived at this address for 43 years. We have always used Park Road Surgery. As it has got too small we always thought that the police station opposite would be the perfect location. When that stopped being a police station we hoped that it would not just be turned into flats like so many places round here. We are not against putting some flats in there particularly affordable ones but we would urge you to make it a condition that the Park Road Surgery should be on the ground floor.	See response to comment 307 in relation to Park Road Surgery.
491	Olivier Somenzi	Site Allocation 9: Teddington Police Station, Park Road, Teddington	<p>i am commenting on site allocation 9 (Teddington Police Station) to ask that:</p> <ul style="list-style-type: none"> - the local Plan requires Park Road surgery to be relocated there as part of any development - any planning consent makes the sale or lease of any residential units conditional on the occupation of the Park Road GP surgery 	See response to comment 307 in relation to Park Road Surgery.
492	Marcia Cotton	Site Allocation 9: Teddington Police Station, Park Road, Teddington	<p>Totally support this as a positive move to supporting the local community better.</p> <p>Current GP Surgery at Park Road far too limited in terms of space and the new proposed site will provide an opportunity to offer a far greater number of local community social services.</p>	See response to comment 307 in relation to Park Road Surgery.
493	Eva Eldridge	Site Allocation 9: Teddington Police Station, Park Road, Teddington	<p>The Surgery definitely needs bigger premises and the best place for the surgery is across the road on the site of the old police station . The site is big enough to house a decent size surgery and room for parking.</p> <p>Park Road Surgery definitely needs to expand and most obvious solutions is to move across the road to the old Teddington Police Station. This site is big enough to house a Surgery with parking . We need to have a doctors Surgery this side of Teddington. You can't keep building houses and flats and not provide the appropriate amenities to go with them.</p>	See response to comment 307 in relation to Park Road Surgery.
494	Jane Tarbuck	Site Allocation 9: Teddington Police Station, Park Road, Teddington	I am commenting on Site Allocation 9, Teddington Police Station, to ask that the Local Plan requires Park Road Surgery (the GP doctor's surgery currently immediately opposite Teddington Police Station in Park Road), to be relocated there as part of any redevelopment. And therefore any planning consent to make the sale or lease of any residential units conditional on the occupation of the GP Surgery. I am the daughter of a 97 year old resident of [Teddington address details removed for data protection] (Mr David Taylor), who is a patient of Park Road Surgery. I have been to the surgery and can see they need new premises. They are a very important part of the community hub in that particular location where they have been located for many years, but their premises in an old Victorian property are very old-fashioned. Relocation to a very nearby site would be preferable to minimise disruption for existing patients where the High Street, bus stops and the railway station are all nearby so that patients can continue to get there with ease.	See response to comment 307 in relation to Park Road Surgery.
495	N Maureen John	Site Allocation 9: Teddington Police Station, Park Road, Teddington	<p>The sale and use of the existing Teddington Police Station on Park Road:</p> <p>Park Road Surgery has been in discussions with the CCG and NHS England over new premises since 2010, having looked at numerous sites over that time. Securing a new surgery on this site would:</p> <ul style="list-style-type: none"> • significantly improve local residents' access to healthcare • support national policy, in particular the aims set out in the NHS Long-Term Plan to move care out of hospital and into the community • support the Teddington Village Plan • improve disabled access • support the strategic aim for social and community infrastructure and "flexible spaces[...]as part of multi-purpose assets" ("Securing new social and community infrastructure", draft Local Plan) <p>I support the proposals in the draft Site Allocations, but would ask that they are strengthened as above to ensure the site continues to be an asset for Teddington in years to come.</p> <p>**I agree with the above which is copied from the Park Road Surgery website and altered to reflect my support.</p>	See response to comment 307 in relation to Park Road Surgery.
496	Christine Palmer	Site Allocation 9: Teddington Police Station, Park Road, Teddington	<p>I am commenting on site allocation 9. Teddington police station, to ask that the local plan requires Park Road surgery to be relocated there as part of any relocation- any planning consent makes the sale or lease of any residential units conditional on the occupation of the GP surgery.</p> <p>as a resident of Teddington for 55 years and a grateful user of this practice for 40 years my family, living here too, agree this would be hugely advantageous to the continued health and well being of this community</p>	See response to comment 307 in relation to Park Road Surgery.
-		Place-based Strategy for Twickenham, Strawberry Hill & St Margarets		

497	David Cornwell, Strawberry Hill Residents Association	Section 8 Place Based Strategy for Twickenham, Strawberry Hill and St Margarets	<p>1. Overall Strategy - 2nd paragraph A short strategy is set out for six of the seven separate areas defined within the overall Twickenham, Strawberry Hill and St Margarets Area, however the seventh area, Strawberry Hill (C4), is omitted. This should be rectified and we suggest the following wording would be appropriate: 'For Strawberry Hill Residential, which has a distinct identity, the strategy is to conserve the existing character and enhance the centre around the station.'</p> <p>2. Policy We do not understand Wellesley Road being quoted as an example for 'reanimating local commercial areas'. Wellesley Road is a residential road and whilst there are three shops and a restaurant in Wellesley Parade at the end of Wellesley Road, all are let and operating.</p>	<p>Add a reference in the Overall Strategy to Strawberry Hill (C4), which reflects the Urban Design Study design guidance for C4 Strawberry Hill Residential (page 288).</p> <p>The Urban Design Study references improving the public realm in locations such as Wellesley Road in the C4 Strawberry Hill Residential design guidance. Public realm improvements outside the shops on Wellesley Road were also referenced in the Strawberry Hill Village Planning Guidance SPD. Regardless of whether the shops are let, there is an opportunity close to the station for enhancement. This bullet point is retained as it is focused on the public realm across this whole place. Amend the reference to Wellesley Parade to aid clarity.</p>
498	Jon Rowles	8. Twickenham, Strawberry Hill, & St Margarets	<p>This is far too big to be a 20-minute neighbourhood. Google Maps estimate that walking from David Lloyd Heath Club at one end to Richmond Bridge at the other would take you 1 hour, 8 minutes. Either the area needs dividing up, or a subset of neighbourhoods set up and strategies for each one developed.</p> <p>The strategy is again a list of aims that are somewhat generic, and most of them could be applied to anywhere. They are clearly not as thorough as the Twickenham Area Action Plan and indicates that the council hasn't put in as much effort to engage with residents.</p> <p>The riverside in Twickenham is semi-rural in character in most parts, and there is a need to protect the viability of the boatyards on Eel Pie Island. When the Twickenham Area Action Plan was examined the inspector highlighted the importance of the car-parking on the embankment for their viability. This new plan is seeking to remove this protection and this needs very careful examination. I doubt short term loading bays would be enough to keep the boatyards in business and there is a need to establish the parking needs.</p>	<p>The 20-minute neighbourhood concept refers to creating a borough where everything a resident needs can be reached within 20 minutes by foot or bike, with local public transport options. It is not meant to refer to an entire place-based area. It is therefore not considered that amendments to the 'place' boundary are required.</p> <p>Twickenham, Strawberry Hill & St Margarets has been created as one of nine high-level 'places' based on categorisation to reflect a 'sense of place' and identification of areas recognised as 'places' by local people as part of the Urban Design Study 2021. The objectives set out within the place areas are intended to be high-level strategic aims and not small-scale specific requirements. Similarities within and across the place-making strategies are inevitable as each strategy is also intended to support the overarching objectives within the Local Plan (for example, encouraging active travel, protecting employment space in town centres, facilitating local economic growth, improving public realm, ensuring development is of a high-quality design). However, the overall strategy for each 'place' also identifies the area's key characteristics and sensitivity to change, and subdivides the 'place' into smaller, more distinct character areas (for example, C3 Twickenham Riverside) and also identifies individual Site Allocations within the 'place'. The overall strategy, vision and policy is thus specific to Twickenham, Strawberry Hill & St Margarets. It is therefore considered that the identification of Twickenham, Strawberry Hill & St Margarets as a 'place', and the overall approach to the place-making strategy, is appropriate and sound. No amendments are considered necessary.</p> <p>On adoption, this new Local Plan will supersede the Twickenham Area Action Plan (TAAP) 2013. The TAAP relates to Twickenham town centre only, the general aspirations for which are replicated in the Twickenham, Strawberry Hill & St Margarets place-making strategy and relevant Site Allocations within the draft Local Plan. This has been subject to various stages of consultation and engagement via a number of means, and the comments and feedback received have been reflected on and have informed the formulation of the Plan where relevant/appropriate.</p> <p>The comment regarding car parking refers to the aspirations of Site Allocation 19 'Twickenham Riverside and Water Lane/King Street'. The Planning Inspector made modifications to the TAAP to refer to a reduction in car parking, to improve the environment of the Embankment, but not a total removal of parking provision, in order to protect the viability of the operation of business on Eel Pie Island. The TAAP was amended accordingly and the Site Allocation continues to reflect this. It is therefore not considered that any further amendments are required.</p>
499	Alexandra Bamford, Boyer Planning on behalf of Twickenham Film Studios	Page numbers: 63, 64, 65, 66, 210, 211, 212 Paragraph numbers: 19.39, 19.40, 19.41, 19.42, 19.43, 19.44, 19.45, 19.46 Policy no./name: 24. Industrial Land Place-based strategy: 8. Place-based Strategy for Twickenham, Strawberry Hill & St Margarets	<p>1. INTRODUCTION These representations have been prepared by Boyer on behalf of Twickenham Film Studios Ltd in relation to the Draft Richmond Local Plan, which has been published for consultation under Regulation 18.</p> <p>In responding to the consultation, the representations make specific reference to Twickenham Film Studios, The Barons, Twickenham, TW1 2AW ('the Studios') owned by our client, and to Arlington Works, Arlington Road, Twickenham, TW1 2BB, which is directly adjacent to the Studios.</p> <p>These representations set out our client's response to a number of items in the draft Local Plan and provide commentary on the relevant policies. In particular, our client's representation focuses on draft Policy 2 'Spatial Strategy: Managing change in the borough (Strategic Policy) (Place-based Strategy for Twickenham, Strawberry hill & St Margarets)' and Policy 24 'Industrial Land'. These representations aim to highlight the importance of the Studios and Arlington Works for continued industrial use in the context of the recent proposals (Ref: 18/2714/FUL) to redevelop Arlington Works for mixed-use, which was refused at appeal</p>	<p>Support for policy noted. See also response to comment 839 regarding designation.</p>

		<p>(Ref: APP/L5810/W/20/3249153). As part of our representations, we propose the designation of 'Arlington Works' as a 'Locally Significant Industrial Site' (LSIS) in the draft Policy Map.</p> <p>Structure of Statement This Statement is structured as follows:</p> <ul style="list-style-type: none"> • Section 2 sets out our interest in the draft Local Plan; • Section 3 sets out our response to the Draft Local Plan and provides commentary on specific policies; • Section 4 provides a summary and conclusion. <p>2. OUR INTEREST This Section sets out our client's interest and reason behind submitting written representations to the Draft Richmond Local Plan Regulation 18 consultation. Twickenham Film Studios On behalf of the client, Boyer has recently secured planning permission (Ref: 21/0094/FUL) on 14th January 2022 for the refurbishment and development at Twickenham Film Studios. The description of development is as follows: "Erection of a new four-storey block (Block A), comprising of a ground-floor café (Use class E(b)), with the upper floor in office use (Class E(g)(i) at the front corner of St Margarets Road and The Barons, together with the partial demolition of Block C and the construction of a single storey extension, the construction of an additional storey and external stair access to Block E, the construction of an additional storey above Block H and the refurbishment and modernisation of all existing blocks within the site along with new signage." The Council were entirely supportive of the application to expand and refurbish the Studios and noted the value that the Studios added to wider creative industries, specifically in terms of the GVA added to the local and national economy. The current development plan recognises the importance of creative industries, and of Twickenham Film Studios itself. The Local Plan identifies the Studios as a Locally Important Industrial Land and as of particular importance for locally creative industries.</p> <p>Arlington Works Boyer were instructed by their client to act as a Rule 6 party in an appeal against the redevelopment of Arlington Works, Arlington Road, Twickenham, TW1 2BB. An application (Ref: 18/2714/FUL) for mixed-use redevelopment was refused on 19th September 2019. The description of development is as follows: "Redevelopment of the site to provide 610sqm of commercial space (B Class) within existing Buildings of Townscape Merit plus a new build unit, 24 residential units (5 x 1 bedroom, 12 x 2 bedroom and 7 x 3 bedroom) and associated car parking and landscaping". The applicant decided to appeal the decision (Ref: APP/L5810/W/20/3249153), which was dismissed by the Inspector following a 10 day Inquiry. As a Rule 6 Party we were able to comment on the possible implications for the continuing operation of the Studios, in relation to the support for the development plan in relation to industrial policy; implications of noise and disturbance; and loss of parking. It is important to note that the Inspector placed significant weight on how planning policies and decisions should recognise and address the specific locational requirements of different sectors, including the creative industries. The QC acting on behalf of the client was able to convey to the Inspector through the appeal process that the Studios' were looking to expand its operations and how the appeal site represents the Studios' only opportunity to do so at its existing premises. In the decision notice the Inspector made clear, in relation to the second main issue 'possible implications for industrial and employment land policy', that <i>"the appropriate use of the appeal site, at least in the first instance by virtue of the sequential test and other associated policies, is for industrial purposes and waste management. Aside from the safeguarded waste use, the industrial presumption could include, together with all other policy-compliant possibilities, opportunities for TS to pursue expansion. Even in the absence of any other marketing as expected by the development plan prior to consideration of non-industrial use, the very real and already expressed interest of TS in seeking to acquire and develop the site to date demonstrates the validity of the plan's expectation to retain the land for industrial purposes"</i>. The Inspector concluded that <i>"proper application of development plan policies includes an opportunity for possible TS expansion onto the site of Arlington Works unless and until such time as the sequential steps are discharged or such other alternative industrial development materialises. Should that industrial ambition of the development plan be abandoned prematurely and without justification, an important potential opportunity would also be lost for Richmond, for London, and for the national film industry"</i>.</p> <p>3. RESPONSE TO DRAFT LOCAL PLAN We set out our response to the relevant draft Local Plan policies below.</p> <p>Policy 2 – Spatial Strategy: Managing change in the borough (Strategic Policy) 8. Place-based Strategy for Twickenham, Strawberry Hill & St Margarets The overarching aim of the policy is to ensure that growth is delivered in a sustainable way, with supporting infrastructure, while tackling the climate emergency and biodiversity crisis. Part B) of the policy states that development in the Borough will prioritise the use of previously development land, including the reuse and conversion of existing buildings to minimise embodied carbon with a presumption in favour of refurbishment. Part D) of the policy states that proposals should have regard to the relevant place-based strategy and set out how a character and design-led approach to change has been taken. We are supportive of the policy in its entirety and consider that it should be given significant weight by the Council in their Local Plan Review. The place-based strategy that we seek to comment on is in relation to '8. Place-based Strategy for Twickenham, Strawberry Hill & St Margarets'. The area encompasses Twickenham Town Centre and Green, Twickenham Residential, and Twickenham Riverside,</p>	
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500	Gary Backler, Friends of the River Crane Environment (FORCE)	8 Place-based Strategy for Twickenham, Strawberry Hill & St Margarets	<p>We welcome the policy which seeks that future development "Contribute to protecting, enhancing and making the most of the character of the built and open environment, including the River Thames and Crane riversides and associated river related activities," giving equal importance to the Crane and the Thames. We believe that the River Crane, released from its concrete channel between Mereway and the A316, naturalised and with continuous public access, has the potential to become a significant ecological and leisure amenity for the Borough. We also support the policy to "Maintain and provide new public toilets within the public realm," and would particularly welcome this in the area of the Shot Tower, to serve the western extremity of Crane Park and Little Park.</p> <p>In the context of residential development currently underway at Site Allocation 11, and considered at Site Allocations 12, 13 and 14, and the risks of overloading the fixed supply of public open space at Craneford West Field and Kneller Gardens, we note the omission from this Consultation draft of any reference to the Council Depot site. This site may be too large for future Depot purposes. The site has a direct frontage onto the DNR and lies adjacent to the pathway along the River Crane. Greening and opening parts of the site to public access may address some of the pressures generated by residential developments at Sites 11-14.</p>	<p>Support for the importance given to protecting and enhancing the borough's riverways is noted. Support for maintenance and provision of public toilets is noted. With regards to desire to see public toilets in the area of the Shot Tower, were a planning application for this to come forward, the draft place-making strategy would support this and so no amendments to the wording of the policy are required. See response to comment 1097 for the Council's general approach to provision of public toilets.</p> <p>The Council Depot is an allocated waste site. This is protected by Policy WLWP 2 of the West London Waste Plan. London Plan Policy S19 'Safeguarded Waste Sites' seeks the safeguarding and protection of existing waste sites in waste management use. There are no plans for the release of the site. Notwithstanding the policy requirements on site with regards to land use, were an application to come forward in the future, the encouragement of improvements and increased accessibility to the riverways is captured within the place-making strategy as well as other policies in the Plan (Policy 39 'Biodiversity and Geodiversity', Policy 40 'Rivers and River Corridors'). Thus no changes to the current wording are necessary.</p>
501	Martin Ellis, South West London Clinical Commissioning Group (CCG)	Place-based Strategy for Twickenham, Strawberry Hill & St Margarets	<p>We note that there are a number of sites within Twickenham town centre which have potential for residential use and collectively will have a cumulative impact of healthcare infrastructure. Policy 10 New Housing indicates that the area has the capacity of 1,100-1,200 new homes over the next ten years.</p>	<p>The impact of new development on existing infrastructure can be assessed as set out in Local Plan Policy 49 'Social and Community Infrastructure' Part F and therefore it is not considered necessary to refer to this in the place-based strategy. The updated Infrastructure Delivery Plan 2023 also identifies future infrastructure and service needs for the borough.</p>
502	Philip Villars, WSP on behalf of Sharpe Refinery Service Limited	8 Place-based Strategy for Twickenham, Strawberry Hill & St Margarets	<p>In relation to Policy 8, we consider the following to be necessary:</p> <ul style="list-style-type: none"> - The policy should be given a clear number and title; - The policy should be clear as to whether it refers to St Margarets Local Centre or St Margarets Residential and give a clearly defined boundary for this; - The policy should consider sites within the area that have the potential to deliver housing and commercial mixed use development within the area to support St Margarets and the London Borough of Richmond achieve the vision and objectives set out at the start of the new Local Plan. - Arlington Works should be included within the site allocations for Policy 8 given the potential that the site has to deliver with certainty much needed homes and commercial floorspace through a mixed use development. 	<p>The place-making strategies sit within the broader spatial strategy and vision of the draft Local Plan. Their 'title' is Section 5 'Places', and their siting under Section 4 'Spatial Strategy, Place-based Strategies and Site Allocations', is considered to be logical. Each 'place' is then numbered from 6 to 14. Twickenham, Strawberry Hill & St Margarets is therefore 'Strategic Policy 8' and the title is the place name. The order in the contents list of the draft Local Plan is considered to be logical and clear.</p> <p>The borough has been divided into 9 high-level 'places', based on categorisations and identifications of areas recognised as 'places' by local people as part of the Urban Design Study. Within the 'places there are also 36 character areas. The strategy makes clear that the descriptions of the areas are based on, and should be read in conjunction with, the Urban Design Study. C6 'St Margarets Residential' has been named such owing to its residential character though also includes the local centre. This is shown on the map. The local centre has not been defined as a separate character area in the Urban Design Study owing to its scale; however, its distinct character is brought out in the text of the character profile for C6. The vision for St Margarets is to maintain the attractive residential character and to ensure that the shopping centres continue to thrive. It is considered to be sufficiently clear that the character area contains St Margarets shopping centre and the surrounding residential areas. Thus, no amendments to the wording are recommended.</p> <p>The place-based strategy includes main sites where the Council believes there is likelihood of change or development in the future, and to provide detailed policies to better control and guide development on the identified Site Allocations. Where sites have been identified as suitable for mixed-use residential/commercial, this has been stated. Further, two additional sites have been added to the Site Allocations (Homebase, Hanworth and Fulwell Bus Depot), both of which identify mixed-use residential redevelopment as being appropriate uses (subject to the retention/reprovision of social infrastructure use on Site Allocation Fulwell Bus Depot). Notwithstanding the mention of Arlington Works, the comment does not</p>

				<p>offer any specific sites for consideration. The Site Allocations identified within the place-making strategy are considered to be sound.</p> <p>Arlington Works is safeguarded use as a waste site and there is a need to protect the industrial use. This position was upheld by the Planning Inspector as part of his dismissal of an Appeal (ref. APP/L5810/W/20/3249153) in January 2021 against the refusal redevelopment of the site for a mixed-use residential/commercial scheme (application ref. 18/2714/FUL). It would thus be inappropriate to identify the site for a residential mixed-use scheme via a Site Allocation. That it has not been allocated does not preclude a development proposal from coming forward and being assessed against the relevant policies in the Development Plan.</p>
503	Charlotte Orrell, DP9 Ltd on behalf of London Square Developments	Place-based strategy for Twickenham, Strawberry Hill and St Margarets	<p>The wider aims and visions for Twickenham, Strawberry Hill and St Margaret’s in terms of the provision of office floorspace and new flexible workspaces within town centres are generally supported. However, we object to a blanket approach to the intensification of existing employment sites which does not consider site specific circumstances, appropriateness for intensification, nor the aim to create vibrant, active and mixed-use town centres.</p> <p>We also consider that that this strategic policy (8) is poorly evidenced and inadequately supported by accompanying development management policies to successfully achieve the draft vision. In particular, this place-based strategy shows the Site as lying within the “Fullwell and West Twickenham Residential Area” which is identified as being of medium sensitivity to change with some potential for positive change. It is also described as possessing “<i>a less coherent character than other areas in the borough, therefore the strategy is to improve the character of the area, with future new development and creation of landmarks taking opportunities to add new character and sense of place</i>”. Logically, it can therefore be deduced that the majority or a large number of the 1,100 – 1,200 new dwellings identified for Twickenham (as detailed in draft Strategic Policy 10) will be delivered within this character area. However, conflictingly only one of the nine draft site allocations for Twickenham, Strawberry Hill and St Margarets is located in the Fullwell and West Twickenham Residential area, and this draft site allocation (14) is for community use. In addition, none of the draft Site Allocations include indicative housing capacities, and the need for new housing is largely absent from draft Strategic Policy 8 (as worded). We therefore encourage the Council to re-word this strategic policy with a greater emphasis on housing delivery and the inclusion of additional site allocations, such as the Greggs bakery, to ensure that the housing target in Strategic Policy 10 is met and the growth aspirations for this part of the borough are realised.</p>	<p>General support for the wider aims of office floorspace provision and flexible workspaces in town centres is noted.</p> <p>The aspiration for an intensification of existing employment sites is consistent with draft Local Plan Policy 21 ‘Protecting the Local Economy’ Part A (1). This is in response to significant losses in employment land and premises across the borough. The approach is considered vital to maintain a sustainable economy in the borough’s town centres and is supported by the Borough Employment Land & Premises Needs Assessment Study 2021. Site-specific circumstances, where relevant, would be considered as part of the planning balance at assessment stage of an application. The inclusion of ‘intensification’ is therefore considered to be necessary and appropriate.</p> <p>The Council does not agree that it can be assumed from the place-making strategy that the majority of the dwellings identified for Twickenham will be delivered in the C7 Fulwell and West Residential Area character area alone. C1 Twickenham Town Centre is also identified as having medium sensitivity to change with some potential for positive change. Further, having a high sensitivity to change does not preclude development coming forward; more that any development would be expected to conserve and where appropriate, enhance, the existing townscape. Notwithstanding this, an additional site located in C7 (Homebase, Hanworth, Site Allocation 19) has been added to the Site Allocations and has been identified as suitable for mixed-use residential-led redevelopment. Furthermore, not all new dwellings are expected to come forward solely via Site Allocation developments alone; small sites and infill developments will also make a contribution.</p> <p>Where Site Allocations have an existing planning consent or live planning application, site development capacity has been stated. The latest Annual Monitoring Report (AMR) (reviewed annually) sets out that the borough is on course to meet and exceed its strategic dwelling requirement over a 10-year period and the current trajectory has been added to the Plan. It is therefore not considered necessary to reproduce figures for the Site Allocations. Further, there is a risk that indicative numbers would be too prescriptive. Where housing is identified as being an appropriate land use, developers would be expected to maximise delivery by making best use of land, as per London Plan Policy GG2, subject to compliance with other relevant policies within the draft Local Plan and the requirements of the Site Allocation.</p> <p>The need to deliver housing in the borough is set out in draft Local Plan Policy 10 ‘New Housing’ (Strategic Policy). Twickenham is recognised as a district centre in the London Plan and is an important employment location and cultural quarter in the borough; it is therefore appropriate that the Strategy 8 highlights the need to support the area’s economic and cultural importance. Where areas are more residential, this has been identified. Where sites have been identified as being appropriate for facilitating residential development, this has been set out in the Site Allocations. The Council has also set out how it will meet its housing target in its latest AMR. With regards to the Greggs bakery site, this has an existing industrial land use. There is a need to protect industrial and employment uses on site and so, notwithstanding the above, it would be inappropriate to reallocate the land for housing as part of a Site Allocation. That it has not been allocated</p>

				does not preclude a development proposal from coming forward and being assessed against the relevant policies with the Development Plan.
-		Site Allocation 10: St Mary's University, Strawberry Hill		
504	David Cornwell, Strawberry Hill Residents Association	Site Allocation 10 St Mary's University	3. We note that whilst the site allocation uses the same wording as in the current Local Plan, the University's vision for development on the campus has changed significantly. The University has confirmed to us that its former plans have been abandoned and will not be resuscitated, and that its vision now is to develop and upgrade its existing residential footprint to improve quality and capacity, to make better use of their academic buildings and generally improve the setting of the University. We have no other comments on the remainder of the draft Local Plan.	St Mary's University have commented on the Site Allocation separately (see comment 506) and do not advise that their intentions for the site have significantly changed. Regardless of this, the Site Allocation would still allow for the upgrading of the university's residential accommodation. No change to the current wording is required.
505	David Marlow	Site Allocation 10: St Mary's University, Strawberry Hill	P86 (Site 10). St Mary's University - very limited expansion only acceptable.	The Site Allocation makes clear that the site is constrained and that intensification, extensions and new build are to be justified fully, and must improve and enhance the MOL and take account of on-site and nearby heritage assets. This matter was discussed in detail in the examination of the Local Plan as adopted in 2018 from which the site allocation has been carried forward, and therefore the Council maintains that the proposed wording is sufficient to ensure that any expansion on site is appropriate to its context.
506	Gavin Hindley, St Mary's University	Site Allocation 10: St Mary's University, Strawberry Hill	<p>We welcome the inclusion of our main campus and the Council's support for our future growth and enhancement. We propose the following changes to the draft:</p> <ol style="list-style-type: none"> 1. It appears that the red line boundary is not quite correct. An area at the rear of 11 Waldegrave Park which is owned by the University but currently leased to Newland House school has been excluded from the boundary. We request that the plan is adjusted to include this area – please see attached plan showing our ownership. 2. We note that this allocation includes our sports ground at Teddington Lock. We believe this should have its own separate site allocation. I attach a plan showing the extent of our ownership. We are currently considering options for improving this site. At present it does not provide an acceptable level of student and community experience. Problems include: <ul style="list-style-type: none"> • buildings that are no longer fit for purpose with inadequate facilities for changing, showering, social interaction and teaching; • insufficient indoor facilities to support our Sport and Exercise Sciences programmes such as strength and conditioning; • low levels of utilisation as a result of the problems mentioned above. <p>We believe these issues can only be addressed through enhancement of existing building and/or development of new additional buildings and provision of artificial sports surfaces to serve the University and to maintain and enhance our partnerships with the local community.</p> <p>We welcome the opportunity of taking forward a site development brief for each of these sites and would be pleased to meet with Council Officers separate from this response.</p>	<p>The proposed boundary already includes part of the area to the rear of 11 Waldegrave Park. The University was asked to confirm their ownership boundary. A response was received 02.12.22 via email which confirms the boundary matches the Site Allocation. No amendments are required.</p> <p>It should further be noted that an area of land not being included within a Site Allocation boundary does not preclude it from coming forward and assessed as part of an overall development proposal.</p> <p>The Site Allocation as already proposed supports the need for the upgrading of the University's associated sport accommodation. The Teddington Lock sports ground is intended to remain in use as a sports ground, and an update of the boroughwide Playing Pitch and Outdoor Sports Strategy is underway to assess current needs for sport and recreation facilities. The Site Allocation as it stands would not prevent part of the site coming forward for development (and assessed against the Development Plan, though it does ensure that any partial development does not preclude the overall objectives of the Site Allocation being met. It is therefore not considered that the creation of a separate Site Allocation is either necessary or appropriate.</p>
507	Katie Parsons, Historic England	Site allocation 10: St Mary's University, Strawberry Hill	<p>The Strawberry Hill site, which includes the Grade I listed Strawberry Hill House, Grade I listed Chapel in the Wood, Grade II* registered landscape and Grade II listed College Chapel, is a highly sensitive one. In the past very ambitious masterplans have been put forward for this site which raised some concern regarding the potential threat to the site's heritage significance, notably the setting of the registered landscape.</p> <p>The estate of buildings within the site vary greatly in quality, from exceptionally important listed buildings dating from the mid eighteenth century, to some functional but architecturally uninspired teaching and residential blocks from the mid-late twentieth century. Ideally the future master planning of the site would explore how lesser quality buildings on site and spaces can be redeveloped, bearing in mind the benefits of reusing buildings to maximise the embodied carbon process. It is advised that this is considered as an option before considering new development in areas that are more sensitive. We recommend that the site allocation policy is amended to reflect this approach. Equally redevelopment of the site provides opportunities to research the historic landscape, and through reinstatement or reinterpretation, better reveal its significance and that of the listed structures within it. Again, we advise that the policy is amended to specifically highlight the need to make use of any opportunities for enhancement that arise. The policy specifies that new development must take heritage into account, but the policy should go further to place an emphasis on enhancement where possible. There are parts of the site that particularly benefit from its existing open quality, this is one of the findings of the Urban Design Study. Again, we advise that this attribute, and the need to consider this early on the design process, is specified in the policy.</p> <p>We are keen to input into the development of any future Masterplan and/or site development brief (SPD) for the site. An archaeological Desk Based Assessment will be required for this site as it is located within the Tier 2 Strawberry Hill Archaeological Priority Area and has the potential for further finds to enhance our understanding of the development of Gothic Revival architecture, and English landscape design. GLAAS should be consulted at an early stage to advise on place making and public benefit.</p>	<p>The wording has been amended to specify that development must protect and, where possible, enhance heritage assets. This would include the historic landscape, which is a Grade II* Listed Historic Park & Garden. With regards to the open quality of the site, the Site Allocation already makes clear that designated open land must be improved and enhanced, and that the playing fields should either be retained or re-provided. This is considered to sufficiently address HE's concerns.</p> <p>Historic England's (HE) desire to be involved in any future master planning for the site is noted, though is not a direct comment on the Site Allocation for the purposes of the draft Local Plan.</p> <p>The Site Allocations have been reformatted and now list the relevant site constraints, including where sites are within an Archaeological Priority Area. An Archaeological Desk Based Assessment would be a mandatory validation requirement for any future relevant planning application and GLAAS would be a statutory consultee. It is noted that HE do not make any specific recommendation for the Site Allocation on this point. No amendments are considered to be necessary.</p>
508	Christine Duke	Site Allocation 10: St Mary's University, Strawberry Hill	Agree with strategy.	Support for the strategy noted.
509	Katy Wiseman, National Trust	Site Allocation 10: St Mary's University, Strawberry Hill	Ham House is located approximately 1 mile to the east of proposed Site Allocation 10: St Mary's University on the opposite side of the River Thames. The proposed site allocation identifies the need to upgrade St. Mary's University through refurbishment, adaptation, intensification, extension, and new build elements on site. We feel that the St Mary's University site could be developed without impacting adversely on Ham House provided that the height of new development is restricted to a maximum height to that of existing buildings on this site. Most buildings within the Strawberry Hill Residential area are between 2-3 storeys	The Site Allocation site is not impacted by Protected Views from/to Ham House and so it is not considered that a prescriptive height limit should be included on this basis. The Site Allocation has been amended to strengthen the requirements of future development, from 'having regard to' sensitive heritage assets, to their protection and, where possible, enhancement. It has further been amended to

			and policy wording should be added to explicitly state that development will be limited to between 2-3 stories in height. This will also have the benefit of conserving this highly sensitive area as identified within the Urban Design Study 2021, and we are pleased that policy wording for this proposed allocation requires development to have regard to this important study. Changes considered necessary: Most buildings within the Strawberry Hill Residential area are between 2-3 storeys and policy wording should be added to explicitly state that development will be limited to between 2-3 stories in height. This will also have the benefit of conserving this highly sensitive area as identified within the Urban Design Study 2021	strengthen the requirement for the 'protection and where possible enhancement' of the 'character and openness' of designated open land, including views and vistas. Any impact on Ham House would therefore need to be considered. The Site Allocation also makes clear that any development proposal would need to have regard to the design guidance in the relevant character area studies within the Urban Design Study, which would include the Strawberry Hill Residential area. The current wording of the Site Allocation is therefore considered to be sufficient. The general support for the approach is noted.
510	Alice Roberts, CPRE London	Site Allocation 10: St Mary's University, Strawberry Hill	Protecting MOL at St Mary's University While the plan seeks to protect Metropolitan Open Land (MOL) the proposals for St Mary's University are very likely to involve inappropriate development on MOL and this means the plan would be unsound with both policies contradicting one another.	The Site Allocation makes clear that development must improve and enhance the Metropolitan Open Land (MOL). It has further been amended to make clear that its openness and character must be protected and where possible enhanced. It is therefore considered that the Site Allocation is in accordance with Policy 35 'Green Belt, Metropolitan Open Land and Local Green Space'.
511	Jon Rowles	Site Allocation 10: St Mary's University, Strawberry Hill	- this could lead to the further loss of Metropolitan Open Land. A master plan should be developed for the site as part of the local plan and be subject to full scrutiny from the inspector. I would like to see some of the existing building footprints returned to the MOL - to compensate for previous losses.	See response to comment 510 on protection of the MOL. The Plan refers to the possibility that a Masterplan and or/site development brief will be developed for the site which will form a Supplementary Planning Document (SPD), which is mentioned in the Site Allocation. Whilst not a direct comment on the Site Allocation, it is worth mentioning here that the legislative framework for SPDs means they are not subject to Planning Inspector scrutiny as they can only provide more detailed advice or guidance on policies in an adopted Plan.
-	Philip Briggs, Richmond Bat Species Action Plan Steering Group	Site Allocation 10: St Mary's University, Strawberry Hill	[See comment 915 in relation to biodiversity]	The Site Allocations have been reformatted to include a section on site designations, including on-site and nearby ecological designations. Para. 21.7 is supporting text to Policy 34 'Green and Blue Infrastructure' (Strategic Policy). All planning applications, where relevant, are expected to have regard to this policy, as they are with all relevant policies within the Local Plan. Whilst the creation of a multi-functional green space wildlife or ecological corridor within the site would be welcome on ecological grounds, it is not considered appropriate to set out supporting text as a policy requirement within a Site Allocation, where it does not form part of the main policy of Policy 34. This requirement would be too prescriptive, and officers feel it is more appropriate for a future applicant to set out how ecological enhancements would be achieved on site as per the requirements of Policy 34. No changes to the wording are therefore recommended.
-		Site Allocation 11: Richmond upon Thames College, Twickenham		
512	Christine Duke	Site Allocation 11: Richmond upon Thames College, Twickenham	Both agree and disagree. Old Richmond College Building could be beautifully repurposed rather than demolished. Could be a school/college for drama, dance, film making, gardening and landscape skills, could have a similar attachment to Eden Project, Cornwall etc.	A resolution to approve planning permission has already been granted by Richmond Planning Committee in August 2022 subject to a S106 Agreement, which is already underway following the outline permission granted in 2016. The demolition of the building is required as part of the overall configuration of the site as per the objectives of the Richmond Upon Thames College (RuTC) masterplan SPD to provide for a variety of educational needs in the borough together with supporting residential development. The existing college buildings will be decanted into newly constructed buildings elsewhere within the masterplan area, and partially by vacant buildings which have already been decanted. The masterplan has already been tested and is now at an advanced stage and therefore it would not be appropriate, or desirable, to include the retention of the existing college building. No changes to the wording are therefore recommended.
513	Mark Buxton, RPS on behalf of Richmond upon Thames College	Site Allocation 11: Richmond upon Thames College, Twickenham	Site Allocation 11 relates to Richmond upon Thames College and states the site proposal comprises: "Redevelopment to provide a new replacement college, science / technology / engineering / maths centre, technical hub (B1), a new secondary school and special education needs school, sports centre as well as residential including affordable housing. Protection and upgrading of the playing field to the south of the college, including the installation of a new artificial grass (3G) playing pitch." As drafted, the site proposal set out within Site Allocation 11 does not reflect the up-to-date position, as set out below. Outline Planning Permission at Richmond upon Thames College was granted on 16 August 2016 under application reference 15/3038/OUT for the re-development of the College's campus including, inter alia, a new ancillary 'Technical Hub' for Haymarket Media. A Reserved Matters application (reference 19/2381/RES) submitted pursuant to the Tech Hub Development Zone was submitted on 31 July 2019. That building was due to be occupied by Haymarket Media. However, Haymarket Media pulled out of their commitment to bring forward the Tech Hub development in 2020 prior to the determination of the Reserved Matters application. The application therefore remains live and undetermined, and the Technical Hub development will not come forward in the form envisaged. The Tech Hub Development Zone currently comprises the existing College's Sports Hall. As a result of the changing circumstances therefore, the College are proposing to retain the existing Sports Hall whilst refurbishing and extending it.	The formatting of Site Allocations has been amended to include relevant planning history for the site, which has now been applied to Site Allocation St Mary's. The Site Allocation has further been amended to remove reference to the Tech Hub, in recognition of the fact that it is no longer likely to come forward.

			Therefore, a Technical Hub will not come forward at the site and as such, reference to the Technical Hub should be removed from Site Allocation 11.	
514	Jon Rowles	Site Allocation 11: Richmond upon Thames College, Twickenham	- text needs to be updated to reflect the redevelopment of the site that has taken place and the remaining land is just the vacant college building awaiting demolition, and the site is now in the ownership of a housing association.	See response to comment 513 regarding recent planning history for the site. The Site Allocation confirms that the site is considered public (Note the Mayor of London's Affordable Housing and Viability SPG considers public land as land that is owned or in use by a public sector organisation, or a company or organisation in public ownership, or land that has been released from public ownership and on which housing development is proposed.)
515	Gary Backler, Friends of the River Crane Environment (FORCE)	Site Allocation 11: Richmond upon Thames College, Twickenham	FORCE has been engaged with this project since its inception. The Council should already be aware of our concerns with regard to this development, in particular the minimal enhancement so far delivered for the River Crane corridor, and the risk of over-use and degradation of Craneford West Field and Kneller Gardens as a consequence of the residential development. The Council should also be aware of our aspirations. These include measures to integrate Craneford West Field with the Challenge Court Meadow by the provision of a more pedestrian-friendly treatment for the end of Craneford Way and by closing off the one-way access from Langhorn Drive which is supposed to be for gym users only but for many years has been abused by others. The intention is to relieve some of the over-use already being seen at Craneford West Field by better use and integration of the facilities at Challenge Court Meadow. We have also stated our aspirations for improvements to both north-south and east-west pathways serving both the Duke of Northumberland's River and the Crane as far as the Hospital Bridge Road and A316 underpasses. These points are also relevant to SA 12, SA 13 and SA 14.	The comment relates to planning applications and the planning history rather than the Site Allocation itself, which already states a requirement to protect, and where possible, enhance the River Crane corridor. It is noted that ecological enhancements have been sought as part of recent planning applications (as per the requirements of the Site Allocation) but that permissions have not yet been implemented. It is therefore not considered that amendments to the wording are required. FORCE's comments regarding their aspirations do not comment on the Site Allocation itself, and it is not considered that the Site Allocation would preclude these, thus no amendment to the wording is recommended.
516	David Wilson, Thames Water	Richmond Upon Thames College Egerton Road Twickenham TW2 7SJ	Thames Water Site ID: 61057 (Pending) Water Response The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development . Waste Response On the information available to date we do not envisage concerns regarding wastewater treatment capacity in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ The scale of development/s is likely to require upgrades to the wastewater network. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan. The plan should determine the magnitude of spare capacity currently available within the network and what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development . Additional Comments With regard to SURFACE WATER drainage, Thames Water would advise that if the developer follows the sequential approach to the disposal of surface water we would have no objection. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. Should you require further information please refer to our website. The proposed development is located within 15 metres of our underground waste water assets and as such we would like the following informative attached to any approval granted. "The proposed development is located within 15 metres of Thames Waters underground assets and as such, the development could cause the assets to fail if appropriate measures are not taken. Please read our guide 'working near our assets' to ensure your workings are in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures.	The Site Allocations format has been amended to include a description of the site/wider area and relevant constraints, to include identification of the flooding constraints for each site. Flood risk / SuDS matters are covered in Policy 8 'Flood Risk and Sustainable Drainage' of this Plan, with which any future planning application would need to comply. The inclusion of informatives would be relevant to any future decision notice and it would not be appropriate to include this in the Site Allocation. Thames Water would be a statutory consultee for any future planning application and would have the opportunity at that stage to recommend informatives. It is therefore not considered necessary to set out the requirements of developers for this in the Site Allocations.
-		Site Allocation 12: The Stoop (Harlequins Rugby Football Club), Twickenham		
517	Vincent Gabbe, Knight Frank, on behalf of Harlequin Football Club Limited	Site Allocation 12: The Stoop (Harlequins Rugby Football Club)	Site Allocation 12 relates to The Stoop / Harlequins Rugby Football Club (The Site). Harlequin Football Club Limited (The Club) supports the inclusion of this Site Allocation, but objects in relation to three aspects of the proposed wording. By means of background, representations were submitted on behalf of The Club in April 2020 and June 2021 to the Local Plan Direction of Travel and Emerging Boroughwide Urban Design Study consultations. These representations set out the opportunity for a major mixed use redevelopment at the site and adjoining land. Copies of these representations are attached [See Appendix 3] and remain relevant in respect of the current draft Local Plan consultation.	The request for the site to be included as a Tall Building Zone references its adjoined siting with RuTC as justification. However, this site itself has not been identified as suitable for tall buildings and buildings implemented on site as part of the master-planning are no taller than 5 storeys; likewise recent planning applications, for which permission to grant has been resolved by Planning Committee, propose building heights of no more than 5 storeys. The constraints of the site include Other Open Land of Townscape Merit (OOLTI) immediately east

			<p>The first objection relates to the proposed building heights. The proposed site allocation, at the penultimate bullet point, cross-refers to the Urban Design Study and states that there is an opportunity in the mid rise building zone (5-6 stories) and then refers to compliance with Policy 45 (Tall and Mid Rise Building Zones).</p> <p>Within the Urban Design Study, The Harlequin Football Club site has been included in sub-area C2c, created specifically for The Site. The study states at Page 109 that this sub-area forms a discrete area standing in contrast to the low-lying residential setting. The area is considered more able to accommodate growth and change. This is an important acknowledgement that The Club agrees with. The adjoining Richmond College site is already subject to major change, delivering increased heights to the area, together with high quality architecture. The subject Site should continue this lead and build further on the opportunity created, for increased densities and high quality buildings.</p> <p>The Club believes that the site has potential to accommodate seven stories or more and should therefore be identified as an opportunity for 'tall buildings'. We note that other similar locations within the Twickenham area have been identified as suitable for tall buildings, including the Stag Brewery, Kew Retail Park and North Sheen / Lower Richmond Road.</p> <p>The representations submitted on behalf of the Club in April 2020 included an initial design concept for The Site, which indicate the scale of development considered suitable. This scale is considered to be sensitive to the setting whilst also making best use of the available land.</p> <p>The second objection relates to the proposed extent of the allocation. The Club owns additional land to the east of the proposed allocation, which has been excluded from the proposed allocation, due to the existence of a designated open space. The Club considers that instead, this area should be included and the allocation should make clear that there should be no loss in terms of the quantity and quality of open space. This would provide the flexibility for open space to be distributed through the proposed development so as to provide the most beneficial urban design solution. The current approach is inflexible and prevents a comprehensive approach to development of the area.</p> <p>The third objection relates to the area immediately south of the proposed allocation, which is occupied by the Twickenham Central Depot site, owned by the Council (The Depot Site). The initial design concept worked up by the Club and submitted in representations to the Local Plan in April 2020 (attached) [See Appendix 3], showed how the Depot Site could be included within the proposed allocation. This was on the basis that the site could potentially become surplus or be rationalised. Doing so would create significant marriage value between the two sites. It would also significantly increase the potential of the proposed allocation to deliver taller buildings, particularly to the centre of the Site. A statement should be made that, in the event that the whole or part of the Depot Site becomes surplus to requirement in the Plan period, it would be logical to extend the design brief for the allocation to include this land.</p> <p>The Club is seeking three changes to the proposed site allocation, as follows:</p> <ol style="list-style-type: none"> 1. The penultimate bullet point should be revised, to acknowledge that the site is suitable for a mix of medium and taller buildings, as shown in the vision drawings submitted by The Club. The draft Policies Map and Appendix 3 should also be updated to acknowledge this. 2. The proposed site allocation boundary should be revised, to take in all of the land owned by The Club, including the area currently excluded to the east side. The policy could acknowledge the need to retain the current quantity and quality of open space in conjunction with this change. 3. The Depot Site, to the south of the Club, should be included within the proposed allocation. The allocation should acknowledge that this area could be incorporated into the proposals if the existing facility was to become surplus or be rationalised. <p>[See Appendix 3 for the Local Plan Representations from 2020 and the Urban Design Study representations from 2021]</p>	<p>and Metropolitan Open Land (MOL) to the southeast and immediately northwest. There is also the CA46 Rosecroft Gardens Conservation Area to the immediate east which comprises two-storey dwellings. These constraints and valued features were identified by Arup during their scenario testing for whether sites can accommodate mid-rise or tall buildings as part of the Urban Design Study 2021, which found that the site has the potential for mid-rise. It is therefore not considered that the Site Allocation should be amended to include it as a Tall Buildings Zone as it is highly unlikely that buildings of this height would be supported by planning officers as part of a planning application.</p> <p>The Open Land Review 2021 assessed Other Open Land of Townscape Importance (OOLTI) and identifies the OOLTI (Site 74: Land at Harlequins, Twickenham' as scoring 'High' against Criteria 1 and 4 'Contribution to the local character and/or street scene, by virtue of its size, position and quality' and 'Contribution to a network of green spaces and green infrastructure' respectively, thus attaining a 'Strong' score overall. Its high scorings are primarily based on its size and its close proximity to recreation grounds on Cranefield Way and the River Crane. It is therefore not appropriate to include in the Site Allocation, particularly as this could weaken its current importance as a network to the nearby recreation grounds. It is not considered that there are any alternative areas of the site which would meet this need. It is therefore not considered appropriate to amend the Site Allocation boundary to include the OOLTI, as development on the designated open land would unlikely be supported by planning officers at application stage. Further, it is worth noting that the exclusion of a site's area from a Site Allocation does not preclude a development proposal from coming forward and being assessed against the relevant policies with the Development Plan.</p> <p>See response to comment no. 500 with regards to the depot being a Safeguarded Waste Site and there being no current plans for its release. As above, the exclusion of a site's area from a Site Allocation does not preclude a development proposal from coming forward and being assessed against the relevant policies with the Local Development Plan. It is therefore not considered appropriate to amend the Site Allocation boundary to include the depot site.</p>
518	Richard Carr, Transport for London (TfL)	Site Allocation 12: The Stoop Twickenham	<p>The site is adjacent to the Transport for London Road Network (TLRN). Early engagement should take place with TfL to assess potential impacts on the TLRN.</p>	<p>The new formatting of the Site Allocations includes site constraints and designations, including matters of access and nearby road networks. The TLRN has been identified in the Site Allocation and there is a requirement that Harlequins RFC engage with the Council and TfL to ensure development does not lead to harmful impacts on the road network. No further changes are considered necessary.</p>
519	Gary Backler, Friends of the River Crane Environment (FORCE)	Site Allocation 12: The Stoop (Harlequins Rugby Football Club), Twickenham	<p>This site has a long frontage onto the Duke of Northumberland's River. We trust that no development of the North Stand, nor indoor leisure, hotel, business or residential developments will be allowed to cause either shading, light or noise pollution of the DNR corridor. In particular, no air-conditioning or other plant should be located near the boundary with the DNR, as has been allowed at Twickenham Stadium. We would welcome a commitment by HRFC to engagement with or adoption of the stretch of the DNR onto which its stadium abuts, in line with best Environmental, Social and Governance practice.</p> <p>We note with concern the preparedness to consider residential development for this site. We would ask that the risks of imposing more crowding and wear-and-tear onto Craneford West Field and Kneller Gardens be given equal weight to consideration of "other sporting and associated uses" in deciding whether or not residential housing is an appropriate development for this site. Any further residential development strengthens the case for opening up the Challenge Court Meadow to public access and integrating it with Craneford West Field.</p>	<p>The Site Allocation makes clear that any development proposal is required to protect, and where possible enhance, the River Crane corridor as well as the Duke of Northumberland River. It is considered too prescriptive for the purposes of a Site Allocation to include mention of a blanket ban on air-conditioning or plant at certain locations; this is a detail which would be dealt with as part of a planning application, the impacts of which would be assessed against existing policies in the (draft) Local Plan, in particular Policies 46 Amenity and Living Conditions and 39 Biodiversity and Geodiversity.</p> <p>Land ownership matters are outside of the scope of planning applications and it is not within the Council's gift to require Harlequins RFC to adopt a stretch of land outside of their ownership. The Site Allocation already makes clear the requirement for the protection, and where possible, enhancement nearby rivers; thus it is not considered necessary or appropriate to amend the Site Allocation on this point.</p>

				<p>The Site Allocation makes clear that any mixed-use / residential use is complementary to the main use of the site as a sports ground, stating that this “may be considered provided that other sporting and associated uses have been fully investigated”. The purpose of this wording is to ensure that the site retains its primary use as a nationally important sporting venue, whilst also recognising that some residential development may be necessary to facilitate this. The Site Allocation has been amended to include the need to protect, and where possible, the character and openness of adjacent designated open land. This is considered to be a more appropriate means of addressing FORCE’s concerns.</p>
520	Christine Duke	Site Allocation 12: The Stoop (Harlequins Rugby Football Club), Twickenham	<p>- Do not agree with proposals re hotel and business uses and do not agree with proposal regarding further housing development in the area.</p> <p>- And especially do not agree regarding the proposal for mid-rise buildings of (5-6 storeys) being identified as beneficial for this site, as would cause significant cramming, and overdevelopment very close to that already proposed/underway at Richmond College site.</p>	<p>See response to comment 520 with regards to the potential for a mixed-use / residential use on site. The comment does not state the reason for the non-agreement to a hotel or business use. The Site Allocation makes clear that Harlequins RFC would need to work in partnership with the Council to demonstrate a potential need for associated facilities such as a hotel or business uses, again making clear that any additional uses would need to be complementary to the main use of the site as a sports ground. The wording of the Site Allocation is therefore considered to be sufficient.</p> <p>In Character Area C2 The Stoop is identified as an area of lower sensitivity which may be able to accommodate growth/change, with opportunity to improve negative qualities through new development. The design guidance section states that large-scale developments such as Twickenham Stadium, but also including The Stoop, should be better integrated into the low-rise context. The mid-rise building zone is identified within a smaller area of the site allocation and incorporates an offset from the Duke of Northumberland’s River to the west and a stepping down in height towards the Metropolitan Open Land (MOL) to the south east. The Urban Design Study concludes that considering the existing character of the area and the constraints, the site has capacity for buildings of 5-6 storeys in the defined zone. No amendments to the wording of the Site Allocation are therefore recommended.</p>
-		Site Allocation 13: Twickenham Stadium, Twickenham		
521	Richard Carr, Transport for London (TfL)	Site Allocation 13: Twickenham Stadium, Twickenham	<p>The allocation states that there is a need to retain sufficient parking, particularly for coaches. This should be rephrased to make it clear that although coach parking should be provided, car parking for employees or spectators should be minimised as part of any redevelopment, consistent with stated objectives to reduce car dominance. The site is adjacent to the Transport for London Road Network (TLRN). Early engagement should take place with TfL to assess potential impacts on the TLRN.</p>	<p>Added clarification that car-parking provision should be to London Plan standards. Added reference to need to improve pedestrian routes where possible and encourage active travel. Given the very low PTAL, it is not considered reasonable to insist that car parking is minimised, as development is also expected to minimise risk of adverse overspill parking on neighbouring streets to the detriment of highways safety; though stating that parking provision should be to London Plan standards would mean that provision would not exceed maximum standards. There is also reference to the need to improve pedestrian routes where possible and encourage active travel. It is therefore considered that the Site Allocation strikes the right balance between adequate car parking provision, encouraging active travel and highways safety.</p> <p>See response to comment 518 regarding reference to the TLRN. The Site Allocation has been further amended to clarify the requirement for partnership working to ensure development does not lead to harmful impacts on the road network. No further changes are considered necessary.</p>
522	Hannah Blunstone, CBRE on behalf of Rugby Football Union (RFU)	Site Allocation 13: Twickenham Stadium, Twickenham (and Place Based Strategy for Twickenham, Strawberry Hill & St Margarets)	<p>On behalf of our client, the Rugby Football Union ('RFU'), please find below a detailed response to Part C of the Draft Local Plan Pre-Publication Consultation Response Form. These representations primarily relate to Site Allocation 13 (SA13) (Twickenham Stadium, Twickenham) which covers 12.62 hectares of land in RFU's ownership. The extent of SA13 is provided as Figure 1 below. Throughout this letter, suggested additions or amendments to policy text are shown in red, and suggested deletions are shown with strikethrough.</p>	<p>Support for inclusion of the Site Allocation and suggestion of developing a master plan is noted.</p> <p>The Site Allocation has been amended to reference the Council’s recognition of the important revenue-generating role that entertainment uses on site have for the viability of the sporting stadium. The text has been amended to state that these will be supported where the use is secondary to the sporting function and where it has been demonstrated that there would be no unacceptable impact on the local road network and neighbouring amenities. The primary sporting function of the stadium and site must be protected and there is a risk that inclusion of ‘entertainment’ as an acceptable primary land use could dilute this protection, as it could not be guaranteed that sporting events would outnumber concerts/entertainment events, which would render the stadium an entertainment venue and not a sporting stadium. Its exclusion from the Site</p>



Figure 1 – Site Allocation 13

SITE ALLOCATION

The RFU strongly support the inclusion of an allocation which reflects the strategic nature of the site and welcome the suggestion of a working partnership with the Council to develop a Masterplan for the site and its long-term development. To this end, we provide the following comments and suggestions with respect to the current drafting of the allocation.

Site Proposal

As drafted, the Site Proposal (p.69) states:

"The Council supports the continued use and improvement of the grounds for sports uses. Appropriate additional facilities including new stands, indoor leisure, hotel or business uses, as well as hospitality and conference facilities, may be supported provided that they are complementary to the main use of the site as a sports ground".

Twickenham Stadium is the home of England Rugby, the largest dedicated rugby union venue in the world and one of London's premier entertainment venues. As drafted, the Site Proposal focuses on sports uses and does not acknowledge the stadium's role as one of London's premier entertainment venues. Non-sporting uses such as concerts are an important part of running a stadium of national importance and have become a vital part of revenue generation.

The RFU's 2019/20 and 2020/21 Annual Reports highlight the impact of COVID-19. The Financial Review within the Annual Report 2021 reports that compared to pre-pandemic forecasts, the RFU's underlying revenues for the year ending 30 June 2021 are 60% lower than its pre-pandemic forecast. The revenue generation of non-sporting events is now more important than ever, in post-pandemic recovery.

As context, ten-year event data provided by the RFU confirms that 15 of the 208 major events held were entertainment rather than Rugby events. The frequency of events and revenue generated by concerts is currently limited by a concert capacity limit of 55,000 as well as the number of concerts allowed per annum.

The context for the allocation states that the Council will work with the RFU to understand the potential need for new and complementary facilities such as hotel, leisure centre, training facilities as well as hospitality and conference facilities. It notes that the applicant will have to demonstrate that the additional facilities do not lead to harmful impacts on the vitality and viability of Twickenham Town Centre, which are fully understood.

Further to the new and complementary facilities included in the draft allocation, we would request specific reference to food and beverage and retail that is ancillary and complementary to the stadium use as a sport and entertainment venue, and subject to a management plan in line with Draft Policy 19 (Managing Impacts).

This would enable development of additional facilities to cater for the stadium's visitors and generate local economic benefit.

Depending on the scale of any retail proposed, it is understood that this would be subject to retail impact assessment to demonstrate no harmful impacts on the Town Centre in line with the NPPF and relevant PPG related to the sequential test and impact test, as well as the relevant Local Plan policy (Draft Policy 18 (Development in Centres) Part F) which sets out the Council's requirements for proposals outside designated town centres.

We propose that the Site Proposal (p.69) is reworded as follows:

*"The Council supports the continued use and improvement of the grounds for sports **and entertainment** uses. Appropriate additional facilities including new stands, indoor leisure, hotel or business uses, as well as **food and beverage, appropriate retail, hospitality and conference facilities**, may be supported provided that they are complementary to the main use of the site as a sports **and entertainment venue ground**".*

Within the context section of the allocation it currently references the general need for new office floorspace in the borough and states that, in the event of an area of the site being declared surplus to requirements, the opportunity to provide for employment floorspace, such as offices or a business park, should be firstly explored. We would propose that more compatible, active uses such as those set out above take priority over office space in this location.

We consider that office space could detract from, rather than enhance, this nationally important sporting and entertainment venue. Further, this provision does not accord with Draft Policy 23 (Offices) which states that major new office development should be directed within the five town centres and smaller scale office development should be in suitable locations such as the designated Key Business Areas.

We therefore propose that the following text is removed/inserted:

Allocation does not preclude entertainment uses from coming forward. At present, entertainment uses on site can take place up to 29 days within and per single calendar year, under permitted development. Additional days would require planning permission, which provides the mechanism for the Council to properly assess the impact of the event(s) of transport, neighbouring amenities, the vitality of Twickenham Town Centre and other local environmental matters such as air pollution. These matters would be considered alongside the existing impacts from the sporting uses/events on site and any other existing complementary uses. This is considered to be the most appropriate approach and that the Council's amended wording for the Site Allocation strikes the right balance between protecting the primary sporting function of the stadium, recognising the important role entertainment uses play towards though, and protecting the amenities of neighbours, local road users and the functioning of Twickenham town centre.

The wording has been amended to include food and beverage as a possible appropriate additional facility subject to a requirement that the applicant demonstrates there would be no harmful impact on the vitality and viability of Twickenham town centre. The wording has also been amended to include 'commercial' and 'retail' but this has been included as 'associated retail' rather than the suggested 'appropriate retail' to clarify that an RFU merchandise store would likely be considered acceptable, whereas a standalone supermarket or other such retail use would unlikely be considered desirable and/or complementary to the primary sporting use of the site. This is considered to adequately meet the requirement in Strategic Policy 8 that 'Twickenham's important sporting and cultural attractions will be maximised and disruption to local residents and businesses minimised'.

The requirement for office and/or employment space is to help meet the overarching vision set out in Strategic Policy 8 for Twickenham to have a strong local economy by rejuvenating its business and cultural offer, and to meet the policy requirement that 'future development in this place is expected, where relevant, to'...'encourage the provision of office floorspace and new flexible town centre and intensification of existing employment sites to provide for jobs and support local businesses'. Whilst the site currently has a Sui Generis land use, it is expected to have an existing employment-generating use and therefore there is a policy expectation that jobs would be replaced, as per Policy 22 'Promoting jobs and our local economy' of the draft Local Plan. The Site Allocation makes clear that a residential use would be considered, subject to sporting, then employment uses, first being investigated, thus the current wording does not preclude a residential use coming forward entirely. Please refer to the earlier response within this comment regarding the suggested wording for an entertainment use.

Support for parking requirements with the Site Allocation is noted. The Site Allocation has been amended to make clear that parking provision would need to be in line with London Plan standards.

With regards to the suggestion that Twickenham Stadium forms its own character area, C2 Twickenham Residential character area already notes that the stadium forms a "distinct sub area". In the sensitivity section, Area B (Twickenham Stadium) and C (The Stoop) are identified as "discrete areas standing in contrast to the mostly low-lying residential setting. In these areas there may be areas more able to accommodate change....". It is therefore not considered that there would be anything further to gain from making stadium its own separate character area, noting too that the area would be of a far lesser scale than other character areas. Further, character area boundaries and Site Allocations do not preclude a planning application coming forward for a development outside of these boundaries. No further changes are therefore considered necessary.

The support for the need for building heights to step down from the stadium towards the boundary is noted. An additional sentence has been added to the Site Allocation to clarify this requirement, as part of the regard that must be had to the Urban Design Study.

			<p>"There is a general need for new office floorspace in the borough and in the event of an area of the site being declared surplus to requirements, the opportunity to provide for employment floorspace, such as offices or a business park, should be firstly explored. A mixed use scheme, which may include residential including affordable housing, may also be considered appropriate provided that other sporting/entertainment and associated uses, including employment, have been fully investigated and that the mixed / residential use is compatible with the main use of the site, i.e. a national stadium, also taking into account the presence of the existing sewerage treatment works to the north of the site and residential amenity."</p> <p>[See also comments 269, 804, 854, 935 and 1027 in respect of Metropolitan Open Land and other policies]</p> <p>Parking RFU agree with the statement within the site proposal context, "to retain sufficient parking, particularly for coaches, servicing facilities and space for spectators and related services". It is essential that the existing parking is retained for the stadium uses only, and is not utilised as overflow from surrounding uses (such as school overflow parking). RFU understand that any further development and expansion would be subject to the relevant strategic and local planning policies promoting towards car-free / car-lite development, although would highlight the unique operational use of the site which will need a strategy to be adapted accordingly.</p> <p>Design objectives The Urban Design Study 2021 locates the Twickenham Stadium complex within the Twickenham Residential character area, which is primarily characterised by Victorian residential properties located to the south of the stadium beyond Whitton Road and Chertsey Road. To the west is the Whitton and Heathfield Residential area, which is characterised by a suburban character and 1930s semi-detached terraced housing. The Stadium comprises an 82,000 seat stadium, along with associated uses such as banqueting and conference facilities, a ticket office, a retail shop, a museum, a gymnasium and a hotel. The existing stadium is equivalent to 13 storeys in height. SA13 states that design objectives and general guidance relating to the local character of the area, which any redevelopment proposals should have regard to, is set out in the Urban Design Study 2021 in the character area profile and design guidance for C2 Twickenham Residential and the Twickenham Village Planning Guidance SPD. However, the height of the existing stadium at 13 storeys, and the land uses identified within the current site allocation (SA11) and emerging site allocation (SA13) are distinct from the traditional residential typology to the south. Whilst we acknowledge that the Urban Design Study references the stadium as an area which is more able to accommodate growth and change, we consider that the stadium merits and would benefit from its own character area, and note that there are character areas defined in the borough of a similar size. CBRE made representations during the Council's consultation on the Urban Design Study in June 2021, on behalf of RFU. The representations set out reasons why the Twickenham Stadium (SA11) ought to form its own distinct character area, potentially in combination with SA14 to the west. Notwithstanding the above, we note that the Urban Design Study (p.109) acknowledges that Twickenham Stadium and its surrounds (sub-area C2b) forms a discrete area standing in contrast to the mostly low-lying, residential setting. It further states that there may be areas more able to accommodate growth and change, where these take opportunities to improve negative qualities and are designed sensitively to respect and enhance existing character. This acknowledgement is supported by RFU and we request this is properly reflected in the Site Allocation 13 and Place-Based Strategy 8 (Twickenham, Strawberry Hill and St Margaret's). RFU would support an approach to stepping down in massing from the stadium to provide integration with the wider low-rise context to the sought as is suggested in the design guidance.</p> <p>Summary The RFU support the prospect of working in partnership with the Council to develop a Masterplan the Twickenham Stadium site and its long-term development. To this end, these representations provide comments and suggestions with respect to the current drafting of the allocation and relevant other policies.</p>	
523	Gary Backler, Friends of the River Crane Environment (FORCE)	Site Allocation 13: Twickenham Stadium, Twickenham	<p>This site has a 700-metre frontage onto the DNR. We trust that none of the "additional facilities including new stands, indoor leisure, hotel or business uses, as well as hospitality and conference facilities" will be allowed to cause either shading, light or noise pollution of the DNR corridor. In particular, no further air-conditioning or other plant should be located near the boundary with the DNR, to add to the noise and light pollution that has already been allowed here. The opportunity should be taken to relocate the existing plant away from the DNR corridor into which it intrudes visually and aurally today. We would welcome a commitment by the Rugby Football Union to engagement with or adoption of the stretch of the DNR onto which its stadium abuts – one of the finest stretches of the DNR – in line with best Environmental, Social and Governance practice. We note with concern the preparedness to consider residential development for this site, as there is no green space in the immediate vicinity. Any such development would add to the risks of imposing more crowding and wear-and-tear on Craneford West Field and Kneller Gardens. We welcome the condition that "any development proposal is required to protect and, where possible, enhance, the Duke of Northumberland River, including access to it, and the associated MOL." We note that new planning regulations require environmental enhancement and not just protection and consider that the wording in all the Site Allocations (e.g. SA 14 below) should be updated to reflect this.</p>	<p>The Site Allocation makes clear the need to protect, and where possible enhance, the Duke of Northumberland River, including access to it and the associated MOL. It is therefore considered that the current wording is sufficient.</p> <p>Please refer to the response to comment no. 519 regarding air conditioning and plant, which is also considered relevant to this comment.</p> <p>Please refer to the response to comment no. 518 regarding land ownership matters, which is also considered relevant to this comment.</p> <p>The Site Allocation makes clear that any mixed-use / residential use is complementary to the main use of the site as a sports ground. However, the site also makes clear that sporting and associated uses, including employment (such as office) must first of all be explored before residential would be considered appropriate. It is recognised that the site is located in an Area Poorly Provided</p>

				<p>with Open Space. This is only part of the reason why residential is not being put forward in the Site Allocation as a primary preferred use, as this designation does not preclude residential development in its entirety. However, any future development would be expected to address this as part of a planning application, and demonstrate compliance with draft Local Plan Policy 37 'Public open space, play, sport and recreation' Part C which requires major developments to provide new on-site open space in areas of Public Open Space Deficiency in addition to any external amenity space. It is therefore considered that the current wording of the Site Allocation is sufficient, as these concerns would be addressed by other policies in the draft Local Plan, and noting the specific requirement in the Site Allocation for the protection of the designated open land.</p> <p>The Site Allocation already includes the need to protect, and where possible, the character and openness of adjacent designated open land and thus the current wording is considered to be sufficient.</p>
524	Christine Duke	Site Allocation 13: Twickenham Stadium, Twickenham	<p>Both agree and disagree.</p> <p>Do not agree with the supporter capacity being increased at the RFU / Twickenham Stadium, there is already significant congestion and disruption on rugby fixture days. The existing capacity of 82,000 is more than our local area can easily and adequately cope with, and the number of fixtures have dramatically increased over the last decade, shutting down residents options over more weekends throughout the year. There are only 52 Saturdays in any given year.</p> <p>Would agree with improvements to hotel facilities for appropriate uses and indoor sports activities.</p>	<p>The vision set out for Twickenham in draft Local Plan Strategy 5 is to rejuvenate its business and cultural offer. Twickenham Stadium is identified as providing an opportunity to enhance the sporting role of Twickenham outside of the town centre. It is recognised that there is a need to retain and enhance the venue to ensure it remains competitive as a world-class standard of sporting facilities and visitor experience. The Site Allocation makes clear that development of the site should come forward as part of a masterplan, so that the Council can understand the RFU's needs for associated and complementary facilities. Impacts on the wider town centre and neighbouring residents would be considered as part of the masterplan process. Further, the Site Allocation has been amended to make clear that development must not lead to an unacceptable impact on the local road network. It is considered that the wording of the Site Allocation strikes the right balance between supporting the sporting aspirations of the site and Twickenham and ensuring that development does not unacceptably impede on neighbours and the local road network.</p> <p>Support for improvements to hotel facilities and indoor sports activities is noted.</p>
525	Jon Rowles	Site Allocation 13: Twickenham Stadium, Twickenham	<p>- the council appear to have carried over text from previous local plans about the new hotel, leisure centre, hospitality and conference facilities. These have been delivered and this paragraph should probably be deleted. Whitton Brook runs under the site, and the proposal should seek to have this uncovered.</p>	<p>Whilst these uses are on site, there is also potential to extend or enhance their offer via redevelopment. The intention of the Site Allocation is to set out what uses would be considered appropriate were any future development to come forward. The site is to be subject to a masterplan, which could include a comprehensive redevelopment of the site. It is therefore appropriate that suitable uses are set out in the Site Allocation. It is therefore not considered that any changes are necessary.</p> <p>The uncovering of Whitton Brook across the site is unlikely to be practicable for the purposes of the aspirations of the site, and there are no policy hooks which would render this a reasonable requirement within the Site Allocation. However, the Site Allocation does state the need to protect, and where possible enhance, the Duke of Northumberland River. Were the uncovering of Whitton Brook a potential and desirable way of achieving this as part of any future development scheme, then the current wording of the Site Allocation would not preclude this. The existing policy wording is therefore considered to be appropriate and no changes are recommended.</p>
-		Site Allocation 14: Mereway Day Centre, Mereway Road, Twickenham		
526	Tom Dunbar	Site Allocation 14: Mereway Day Centre, Mereway Road, Twickenham	<p>Myself (and others) in Barneby Close would be willing to buy part of the site to offset the cost of a local amenity. We are happy to discuss this directly with yourself.</p> <p>The site has been disused for many years, is known for poor subsistence / flooding issues, and has poor links to public transport. Moreover, it does not have good road access or parking (e.g. Mereway / Gould Road is already too bust and dangerous given the number of schools in the immediate vicinity).</p> <p>The site would benefit from:</p> <ul style="list-style-type: none"> - being used in part or in full for public good, so long as it does not further the challenges listed above (e.g. strain on road). - being used as a green space - as it naturally sits in an area that naturally extends from the Mereway Nature Reserve (and is identified as a key area for certain species e.g. bats). <p>There may well be so low impact options that could suit a wider purpose if (the preferred) option of turning it into a green space is not possible:</p> <ul style="list-style-type: none"> - low-rise (E.g. single storey) utility for education (e.g. a school classroom) or nursery 	<p>Given the small size of the site, the Council's preference would be for comprehensive development of the whole site in order to fully unlock the site's potential of delivering a viable scheme which meets the requirements of the Site Allocation. However, the boundary of the Site Allocation would not necessarily preclude a partial development from coming forward, provided it could be demonstrated that the remainder of the undeveloped site, and the site as a whole, could feasibly meet the policy requirements of the Site Allocation in the future. The wording of the Site Allocation has been amended to reflect this. With regards to the proposals the resident puts forward in their comment, these would in principle be compatible with the requirements of the Site Allocation, and so no further amendments to the wording are recommended.</p>

			- sell part of the land to Barneby Close to offset the cost. The land would not require access as it could be an extension of existing land that backs on to the site.	
527	Christine Duke	Site Allocation 14: Mereway Day Centre, Mereway Road, Twickenham	Agree with the site proposals for this site, social and community as was.	Support for social/community use noted.
528	David Wilson, Thames Water	Mereway Day Centre, Mereway Road, Twickenham	<p>Thames Water Site ID: 49786 (Reviewed Oct17)</p> <p>Water Response On the information available to date we do not envisage infrastructure concerns regarding water supply network infrastructure in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ</p> <p>Waste Response On the information available to date we do not envisage infrastructure concerns regarding wastewater network or wastewater treatment infrastructure capability in relation to this site/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ</p> <p>Additional Comments With regard to SURFACE WATER drainage, Thames Water would advise that if the developer follows the sequential approach to the disposal of surface water we would have no objection. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. Should you require further information please refer to our website.</p>	Comments noted. Please also see response to comment no. 516. It is not considered that any further amendments to the Site Allocation are necessary.
529	George Goodby, Environment Agency	Place-based Strategy for Twickenham, Strawberry Hill & St Margaret's Site Allocation 14: Mereway Day Centre, Mereway Road, Twickenham	<p>We are pleased to see a desire to protect and enhance the River Crane as part of any development of this site. The River Crane does not currently achieve good ecological potential as required by the Water Framework Directive. There should be a commitment to 20% net gain for the river as part of any development, and this should be measured using the River section of the DEFRA Biodiversity Metric.</p> <p>It is one of the stated aims of the Lower River Crane Restoration Strategy's Vision Document to make space alongside the open concrete channel of the Lower River Crane, so that it can be broken out of its concrete channel and re-naturalised. Any development on this site should contribute to these objectives and liaise with the Crane Valley Partnership.</p>	Support for protection/enhancement of the River Crane noted. The supporting text to Policy 40. Rivers and river corridors refers to restoration works along the lower Crane. Any development would be expected to demonstrate 20% Biodiversity Net Gain as per the requirements of draft Local Plan Policy 39 'Biodiversity and Geology'. It is therefore considered that the wording of the Site Allocation is adequate as the EA's requirements would be covered by other policies within the Local Plan. The Crane Valley Partnership are not a statutory consultee (as defined in law and national Planning Practice Guidance), however as set out in the Council's Statement of Community Involvement the views of groups will be sought where appropriate, and it also sets out details for publicity of planning applications.
530	Mary Egan	Site Allocation 14 - Mereway Day Centre	<p>I would object to redevelopment for a social or community infrastructure use here because of the congested traffic/parking in Mereway Road and dangerous junction at Gould Road and no possible access to public transport. The same reasons apply to affordable housing. Currently the area is very densely packed with a warren of small houses, owners sometimes having two cars. In my opinion, the optimum use of the land would be to extend the Mereway Nature Reserve/Knellers Gardens. The possibility of a one storey nature classroom for children, sympathetically designed, would be a second line of approach.</p> <p>Changes considered necessary: There is a statutory requirement to leave an 8m undeveloped corridor and LP18 states the planning policy on River Corridors - "Development adjacent to the river corridors will be expected to contribute to improvements and enhancements to the river environment."</p> <p>LP18C(C). There is an also an expectation that all major development proposals adjacent to the borough's rivers shall provide public access to the riverside. "Where appropriate, developments alongside and adjacent to the River Crane should contribute to the overarching aim of creating a new metropolitan park that provides a continuous, accessible link between Hounslow Heath and the River Thames, incorporating river restoration along the lower Crane, including a long distance footpath, improved access for surrounding communities and an enhanced wildlife corridor"</p> <p>I would expect the Plan to reflect these aims. The construction of the Fish Pass is a great tribute to the Environment Agency and the Borough - sensitive approach to its surrounding environment would be extremely valuable.</p>	<p>The existing site currently has a social/infrastructure use and so the Site Allocation is requiring retention of the existing land use, as per draft Local Plan Policy 49 'Social and Community Infrastructure' (Strategic Policy). This policy recognises the vital role social/community facilities infrastructure plays in the provision for the health and welfare of the community, and as such, resists the loss of existing infrastructure. Where a loss is being proposed, the policy allows for a 100% affordable housing scheme, to compensate for the loss and in recognition of the acute affordable housing need in the borough. A poor public transport accessibility rating and highways conditions would not outright preclude development from coming forward; rather any development would be expected to address transport and access concerns as part of the planning application, in line with relevant transport policies in the Development Plan. This is also the case for any potential future residential development, for which the Site Allocation also makes clear that parking provision would be expected to be in line with London Plan standards. It is therefore considered that the requirement to retain the existing social/community use, or change of use to a 100% affordable housing scheme, is justified and appropriate and it is not recommended that any changes to the Site Allocation wording are made on that basis.</p> <p>The Site Allocation makes clear that development would be expected to protect, and where possible enhance, the River Crane corridor. Draft Policy 40 'Rivers and river corridors' is proposed to replace adopted Policy LP18. Any future proposal would be expected to adhere to the policy requirements set out in draft Policy 40 and the Environment Agency would be a statutory consultee as part of the planning process. It is therefore considered that the current wording of the Site Allocation is sufficient, as these requirements would be addressed elsewhere in the Local Plan.</p>

531	Gary Backler, Friends of the River Crane Environment (FORCE)	Site Allocation 14: Mereway Day Centre, Mereway Road, Twickenham	<p>If this site is to be used for social or community infrastructure, we would support the inclusion of a River Crane-focused element. This could range from some interpretation boards right up to a river garden or even an Ecology Centre, as is the ambition for the new Northcote Nature Reserve in St Margaret's.</p> <p>We support the test that "Only if other alternative social or community infrastructure uses have been explored and options discounted in line with other policies in this Plan, would a residential-led scheme...be considered" and we welcome the requirement that "Any development proposal is required to protect and, where possible, enhance the River Crane corridor." We would like to see public access to this bank of the Crane provided at this location as part of any redevelopment.</p> <p>Particularly in the context of potential residential developments on Site Allocations 12 and 13, the Council could consider leaving this entire site undeveloped, as a completely new publicly accessible green space, to complement and provide some relief for Kneller Gardens.</p>	<p>Please see response to comment no. 530 regarding reference to the protection, and where possible, enhancement of the River Crane and the requirements of draft Policy 40. The wording of the Site Allocation is considered to be sufficient to allow for the suggestions put forward FORCE to be considered. Although FORCE are not a statutory consultee (as defined in law and national Planning Practice Guidance) for any future planning application, as set out in the Council's Statement of Community Involvement the views of groups will be sought where appropriate, and it also sets out details for publicity of planning applications.</p> <p>Support for the exploration of social/community infrastructure uses prior to the consideration of a residential scheme is noted. Support for the protection, and where possible enhancement, of the River Crane corridor is noted.</p> <p>Please see response to comment no. 530 regarding the rationale for supporting development on the site.</p>
532	Sue Clayton Smith	Draft Local Plan Pages 14-28 . Place based strategy 53-57. Site allocation 58-61 14 Mereway Day Centre	<p>Site Allocation 14 - Mereway Day Centre P58-61 Disagree.</p> <p>I object to the redevelopment for a social or community infrastructure here because this is adjacent to a high density area of tightly packed roads where traffic and parking is already congested. Additional traffic would have a detrimental affect on the area. There is already a dangerous junction at Gould Road/Mereway Road, which would be worse with increased traffic.</p> <p>I also strongly object to the suggestion that if a use could not be found for a social or community infrastructure use it could be dedicated to 100% affordable housing for the same reason. Creation of flats or houses and their attendant increase in traffic would significantly increase the traffic/parking congestion.</p> <p>A significant amount of money is being spent on creating a fish pass adjacent to this site so in my view the best use would be to add this space to the Kneller Gardens/Mereway Nature Reserve, which would increase green space for residents in what is already a popular area.</p>	See response to comment 530 regarding community/social infrastructure use and/or residential development on site and transport concerns, and the rationale for the development proposed in the Site Allocation.
-		Site Allocation 15: Station Yard, Twickenham		
533	Richard Carr, Transport for London (TfL)	Site Allocation 15: Station Yard, Twickenham	We welcome the reference to bus stands. However, the requirement that bus stands should be retained, redeveloped or re-sited in a suitable location needs to be clarified. If bus stands are redeveloped or re-provided this should only be with the agreement of TfL and standing capacity (as well as drivers' facilities) must be maintained and enhanced.	Support for reference to the bus stands is noted. The Site Allocation has been amended to reference the need for consultation with TfL and the provision of standing capacity and drivers' facilities.
534	Luke Burroughs, Transport for London (TfL) Commercial Development	Site Allocation 15: Station Yard, Twickenham	<p>Site allocation 15: Station Yard</p> <p>It is welcome that this site allocation includes the TfL landholding. This land has ongoing operational requirements as a bus stand on days when there are events at Twickenham Stadium. However, as recognised in the allocation, should a suitable replacement location be found for this bus stand it will enable development to come forward on this site. A map of this site allocation can be found in appendix 1.</p> <p>[The map was not enclosed, but maps were provided previously to the Call for Sites and are published in the Schedule of Call for Sites all responses received – Appendices (page 3)]</p>	<p>Support for inclusion of TfL landholding noted.</p> <p>The Site Allocation makes clear that re-provision / re-siting of the bus stand would be considered appropriate as part of a comprehensive redevelopment of the site. Therefore no changes to the wording are necessary.</p>
535	Christine Duke	Site Allocation 15: Station Yard, Twickenham	Agree/disagree, housing development could reduce possibility of using this site for freight transportation by rail in the future as would ease congestion/pollution etc.	The borough has an acute housing shortage and the Council has to identify sites where residential development would be appropriate. There is currently an extant planning permission for a residential development on site. No interest has been expressed by Network Rail to purchase the land for freight transportation purposes and thus there is no likelihood that such a development would come forward. It is therefore not considered that the requirements of the Site Allocation should be amended.
536	David Wilson, Thames Water	Station Yard, Twickenham TW1 4LJ	<p>Thames Water Site ID: 63064 (APPROVED - 03/03/21)</p> <p>Water Response On the information available to date we do not envisage infrastructure concerns regarding water supply network infrastructure in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ</p> <p>Waste Response</p> <p>On the information available to date we do not envisage infrastructure concerns regarding wastewater network or wastewater treatment infrastructure capability in relation to this site/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ</p> <p>Additional Comments</p> <p>With regard to SURFACE WATER drainage, Thames Water would advise that if the developer follows the sequential approach to the disposal of surface water we would have no objection. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. Should you require further information please refer to our website.</p>	Comments noted. Please also see response to comment no. 516. It is not considered that any further amendments to the Site Allocation are necessary.

			There are easements and wayleaves running through the Site. These are Thames Water Assets. The company will seek assurances that it will not be affected by the proposed development. There are public sewers crossing or close to your development. If you're planning significant work near our sewers, it's important that you minimize the risk of damage. We'll need to check that your development doesn't limit repair or maintenance activities, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes. https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes .	
-		Site Allocation 16: Twickenham Telephone Exchange		
537	Christine Duke	Site Allocation 16: Twickenham Telephone Exchange	Agree/disagree. This preused site could be purposed solely for housing needs as those are significant, retail and commercial buildings / shops etc. available to rent at the moment in close proximity to the old Twickenham Telephone exchange building.	The strategic vision for Twickenham is to retain and enhance its retail offer and economic importance. The site has an existing employment use and is located in an Area of Mixed Use in a Town Centre Boundary. It is therefore considered appropriate that the site is recommended for a mixed-use development comprising commercial and retail, noting too that the Site Allocation makes clear that a residential use would be considered appropriate as part of a mixed-use scheme. It is not considered that amendments to the Site Allocation are necessary.
538	David Wilson, Thames Water	Twickenham Telephone Exchange	<p>Thames Water Site ID: 71999</p> <p>Water Response On the information available to date we do not envisage infrastructure concerns regarding water supply network infrastructure in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ</p> <p>Waste Response On the information available to date we do not envisage infrastructure concerns regarding wastewater network or wastewater treatment infrastructure capability in relation to this site/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ</p> <p>Additional Comments The proposed development is located within 15 metres of our underground waste water assets and as such we would like the following informative attached to any approval granted. "The proposed development is located within 15 metres of Thames Waters underground assets and as such, the development could cause the assets to fail if appropriate measures are not taken. Please read our guide 'working near our assets' to ensure your workings are in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures. With regard to SURFACE WATER drainage, Thames Water would advise that if the developer follows the sequential approach to the disposal of surface water we would have no objection. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. Should you require further information please refer to our website.</p>	Comments noted. Please also see response to comment no. 516. It is not considered that any further amendments to the Site Allocation are necessary.
-		Site Allocation 17: Twickenham Police Station		
539	Vincent Gabbe, Knight Frank, on behalf of the Metropolitan Police Service	Site Allocation 17: Twickenham Police Station	Proposed Site Allocation 17 (Twickenham Police Station) sets out details of what proposals would be acceptable if the Metropolitan Police Service were to vacate Twickenham Police Station and dispose of it. However, the MPS Estates Strategy confirms that this property is to be retained. The policy is therefore unnecessary and may cause confusion for local stakeholders as to the strategy for policing in the area. Proposed Site Allocation 17 (Twickenham Police Station) should be removed from the draft plan.	The Site Allocation has been removed from the Plan.
540	Christine Duke	Site Allocation 17: Twickenham Police Station	Needs to be kept as a working Police Station, every town centre should have one.	Please see response to comment no. 539.
-		Site Allocation 18: Twickenham Riverside and Water Lane/King Street		
541	EE McClelland	Place based strategy for Twickenham: Twickenham Riverside and Water Lane/King Street	I have concerns about the quantity of housing and retail being placed on this site. In keeping with your stated aims I believe this site should be more about providing public access and preserving or reinstating river habitat and a diverse range of settings for the public to enjoy. The current plan lacks biodiversity and is at risk of becoming a sterile paved plaza hemmed in by much too tall buildings.	The observation is a comment on the recent planning application submitted (and approved) for the site, rather than a direct comment on the Site Allocation. The Site Allocation makes clear the requirement to create high-quality public realm, provide space for activities and outdoor uses, and improve access through the site. Issues relating to biodiversity and design would be addressed via other policies within the Local Plan. It is not considered that amendments to the wording of the Site Allocation are necessary.
542	Richard Carr, Transport for London (TfL)	Site Allocation 18: Twickenham Riverside and Water Lane/King Street	We welcome the suggestion that ' <i>There should be a comprehensive approach to servicing and delivery, along with exploring the opportunity to improve the environment of the Embankment through a reduction in car parking.</i> ' This could be more directly worded to state that any redevelopment would be expected to remove car parking on the Embankment.	Support for reference to servicing/delivery approach and reduction in car parking noted. The Site Allocation already states a reduction in car parking is sought to improve the environment of the Embankment. Retention of some car parking on the Embankment is required for the servicing of Eel Pie Island. It is therefore considered that the wording of the Site Allocation strikes the right balance between improving the environment of the Embankment via a reduction in car

				parking and ensuring the operation and viability of businesses on Eel Pie Island is not impeded. Thus no amendments to the Site Allocation are recommended.
543	David Marlow	Site Allocation 18: Twickenham Riverside and Water Lane/King Street	P79 (Site 18). Twickenham Riverside - to suggest that Council is offering improvement/enhancements to Diamond Jubilee Gardens as an option is clearly absurd. This was never an option to us in lots of public consultation but would have been very welcome. £4 million is being spent on fees alone for this multi million pound vanity project (costs are currently a secret). The current public toilets are reduced to a mere 'aspiration'. A disgraceful CPO has been issued against the Trust whose own surveyors say re-provision is inferior to current. The new traffic scheme is dangerous - the Council's own consultants say two-way working in both Wharf Lane and Water Lane... risks collisions, with vulnerable road users - pedestrians and cyclists. This beggars belief!	The observations related to Diamond Jubilee Gardens is not a direct comment on the Site Allocation itself, which states a requirement for minimum equivalent of public open space which can be achieved through improvements/enhancements to the Diamond Jubilee Gardens, thus no amendments to the wording are considered necessary. The observation on fees is not a direct comment on the Site Allocation and so no amendments to the wording are considered necessary. Site Allocations are by their nature an indication of policy aspirations for a site, and it is noted that the provision of public toilets has been cited. No amendments to the wording are therefore required. The observations on the CPO are not a direct comment on the Site Allocation and so no amendments to the wording are considered necessary. The transport comments relate to a traffic scheme and are not direct comments on the Site Allocation itself and so no amendments are considered necessary.
544	Christine Duke	Site Allocation 18: Twickenham Riverside and Water Lane/King Street	Please do your very best regarding development of this site. Please ensure that it will be special for everyone and not just the privileged few.	The comments are noted. The Site Allocation seeks to ensure that public benefits are incorporated into any future development scheme via, inter alia, the provision of affordable housing, an improved employment and retail/commercial offer, new open space and better permeability for active travel. It is therefore considered that the wording of the Site Allocation is sufficient.
545	Michael Atkins, Port of London Authority (PLA)	Site Allocation 18: Twickenham Riverside and Water Lane/King Street	In principle support allocation [18 Twickenham Riverside], particularly with regard to bullet point 9 which states that any proposal should seek to maintain the embankment as a working quay, provide mooring and landing facilities, and consider the impact on the character and function of Eel Pie Island. This is particularly important given the number of operational boatyards present on Eel Pie Island which in line with London Plan policy SI15 (Water Transport) should be protected. Also support the wider policy wording for Twickenham, Strawberry Hill & St Margarets which states that future development in this area is expected to contribute to protecting, enhancing and making the most of the character of the built and open environment, including the River Thames riverside and associated river related activities and Twickenham working waterfront. This is also in line with policy SI15 of the London Plan.	Support for the Site Allocation and bullet point 9 is noted. Support for the place-making strategy is noted.
546	Katy Wiseman, National Trust	Site Allocation 18: Twickenham Riverside and Water Lane/King Street	Ham House is located to the east on the opposite side of the River Thames to proposed Site Allocation 18: Twickenham Riverside. We note that this allocation is for a comprehensive mixed-use redevelopment of the site, which includes a large area which is currently derelict. Whilst this presents a significant opportunity to improve and regenerate the area, it is imperative that it is carefully designed to minimise any visual impact on the wider area, including Ham House. In line with the Urban Design Study 2021, development on this site should also conserve key views and vistas to nearby green space and landmarks along the river. This may require a restriction to be placed on the height of new buildings in this location and we recommend that this is clearly set out within any future policy wording for this allocation. Changes considered necessary: It is imperative that development is carefully designed to minimise any visual impact on the wider area, including Ham House. In line with the Urban Design Study 2021, development on this site should also conserve key views and vistas to nearby green space and landmarks along the river. This may require a restriction to be placed on the height of new buildings in this location and we recommend that this is clearly set out within any future policy wording for this allocation	The Site Allocation site is not impacted by Protected Views from/to Ham House and so it is not considered that a proscriptive height limit should be included on this basis. The Site Allocation has been amended to refer to the need to take views into account when considering overall design, heights and massing. Any impact on Ham House would therefore need to be considered. The Site Allocation also makes clear that any development proposal would need to have regard to the design guidance in the relevant character area studies within the Urban Design Study 2021, which would include the Strawberry Hill Residential area. The current wording of the Site Allocation is therefore considered to be sufficient.
547	Jon Rowles	Site Allocation 18: Twickenham Riverside and Water Lane/King Street	- This site was originally a park, and then an open-air lido was built on part of the site, most of which was then converted back to a public park (Diamond Jubilee Gardens). I do not agree that flats should now be built on Diamond Jubilee Gardens. The Council is arguing that somehow a row of shops and a pub will have a large regenerative impact on Twickenham. However, the building footprint is modest and not big enough to drive footfall in its own right and nor is the proposed architecture and landscaping of a distinction likely to attract large numbers of visitors either. The viability plan shows that the proposed development will need over ten million pounds of subsidy on top of the housing subsidies already proposed. Therefore the inspector's findings in the previous Twickenham Area Action Plan probably still stand and the council should provide detailed justification on why they want to depart from the TAAP inspection findings	This Local Plan, on its adoption, will supersede the TAAP, which was adopted in 2013. The Planning Inspector's Report as part of the plan-making process for the TAAP concluded that, whilst there were some concerns about the deliverability of the proposals for Twickenham Riverside, there was clearly scope for redevelopment or reuse of the site and that its identification in the TAAP as an Opportunity Area (TW7) was justified. The Inspector recommended modifications to the proposals to ensure that redevelopment could be delivered to make the Plan effective, which related to the recognition of the role of the Riverside and its physical constraints in the aims for the area, which would allow for residential and/or town centre uses on the site. The principle of a requirement for residential and retail on site is therefore established and the Site Allocation is therefore in accordance with the objectives set out in the TAAP, which was found to be sound. The TAAP identifies this area as being critical to the success of Twickenham as a destination and therefore seeks a comprehensive approach to development to ensure connections to the riverside are enhanced and to make Twickenham a more attractive destination. The requirement for improved permeability for active travel through the site is intended to create a link between Twickenham town centre and the riverside, which would likely increase footfall. The Site Allocation is in accordance with the principles set out in the TAAP, which it would replace, and which was found by the Inspector to be sound.

				The observations relating to design and architecture are not a direct comment on the Site Allocation, as this does not set out such prescriptive detail, and is instead believed to be a comment on the recent planning application for the site. The Site Allocation references the need for design to have regard to heritage sensitivities and immediate context. The wording of the Site Allocation is therefore considered to be appropriate and no changes are recommended.
548	George Goodby, Environment Agency	Place-based Strategy for Twickenham, Strawberry Hill & St Margarets Site Allocation 18: Twickenham Riverside and Water Lane/King Street – Twickenham, Strawberry Hill and St Margarets.	This site is located in close proximity to the Tidal Thames statutory flood defences. Bullet point 10 references flood defence improvement and upgrading works. We strongly support this but recommend removal of the term ‘where viable’ as these works are necessary for the site to demonstrate it is ‘safe for its lifetime’ and does not ‘increase flood risk elsewhere’ in line with the NPPF Paragraph 159. We would also recommend that this bullet point references improved flood defence maintenance access as a requirement. As a recommendation, bullet point 10 could be re-worded to say ‘Due to its location on the banks of the River Thames, flood defences and maintenance access should be upgraded and improved. Works should be informed by discussions with the Environment Agency. A Riverside Strategy Approach should be adopted to deliver multiple benefits to flood risk, biodiversity and public realm’. Recommended action: We recommend you update the wording to context bullet point 10 of Site Allocation 18. Natural Flood Management techniques should be incorporated into any upgrade of the flood defences where possible. This could include a consideration to reengineer the riverbank, applying softer engineering approaches. The use of natural flood management techniques would also help any development at the site achieve the net gain requirements as outlined in Policy 39 .	Support for reference to flood defence and improvement works noted. The wording has been amended to remove reference to ‘where viable’, as suggested by the EA. It is not considered necessary to make specific reference to a Riverside Strategy Approach as the Site Allocation already makes clear that flood risk benefits, urban greening and public realm improvements would be expected. No further amendments to the wording are recommended.
Place-based Strategy for Whitton & Heathfield				
549	Jon Rowles	9 Whitton & Heathfield	Does not address the main 20-minute neighbourhood challenge facing the area is a lack of local employment resulting in the vast majority of people having to travel out of the area for work and when it comes to leisure, there is very little in the way of entertainment, culture or restaurants. This makes W&H one of the most car-dependent areas of the borough. There is a need to explore how the three railway bridges on Hanworth Road, Hospital Bridge Road and Nelson Road can be adapted so there are reasonable pavements and facilities for cyclists. I note that Ham, Petersham and Richmond Park have a strategy for a new bridge and it seems odd that the identified need for better bridges in Whitton has not made it to the local plan.	Whitton is designated in the borough’s centre hierarchy in the Local Plan as a Town Centre. Policy 17. Supporting Our Centres and Promoting Culture supports development which reflects the centre’s role and function within the hierarchy, including directing new development for retail, leisure and business uses to the town centres. The policy supports the diversification and repurposing of high streets and centres to contribute towards retail, leisure, business, educational, healthcare, community and cultural floorspace, and to encourage hubs with clusters of uses that support the centre hierarchy to become key meeting places and provide opportunities for linked trips at different time of the day and night, in accordance with Policy 1. Living Locally. Within the place-based strategy itself, two Site Allocations have been designated as providing opportunities for new employment uses (Telephone Exchange and Kneller Hall). The strategy also commits to continuing working with Love Whitton, who actively promote Whitton businesses and also organise cultural events in the community. The vision for Whitton and Heathfield includes ensuring the provision of community facilities and transport links, supported by the policy expectation that development considers opportunities to reduce the dominance of cars and promote active travel, as well as contribute opportunities to encourage village events such as markets or regular cultural events in the High Street or other suitable areas such as parks and open spaces, including measures to enable ‘spill out’ from restaurants, cafes and pubs. It is therefore considered that the retention and intensification of employment space, and other suitable town centre uses such as restaurants, culture and leisure, in the area is covered in other policies in the Local Plan, and that the requirements and aspirations of the place-making strategy are compatible with these policies, as they are with Policy 1. No amendments to the text are required. The policy section of the place-making strategy requires consideration of opportunities to reduce dominance of cars and promote active travel, improving the permeability and creating space for pedestrians. The text has been amended to also include ‘measures to improve cycling safety’ to give greater emphasis to this element of active travel. Regarding the three bridges referenced, were it demonstrated that new development would result in an impact on the network, a reasonable contribution towards highways safety and cycling/pedestrian improvement measures could be sought as part of the planning application. As it stands, there are no current plans for the Council to upgrade these three bridges, noting their narrowness of width and thus the limitations. It is therefore not considered necessary to specifically reference the three bridges in the place-based strategy. With regards the bridge in Ham, initial feasibility has been undertaken for a new pedestrian and cycle bridge in the borough, with the best location found to be connecting Ham and Twickenham, with another viable location identified as

				<p>Ham to Radnor Gardens in Strawberry Hill. However, as set out in the Council's third Local Implementation Plan 2019-2041, additional studies are required to determine the economic feasibility of the bridge and funding for the bridge must still be found. It has not been identified as part of the study that the best place for the new bridge would be Whitton and Heathfield. No amendments to the place-making text to mention a new bridge are therefore required.</p> <p>Separate to the remit of the Local Plan, the Council is progressing a Hospital Bridge Road corridor movement study (an update was reported to the Council's Transport and Air Quality Committee in February 2023), however such highways improvements are not directly linked to Local Plan policies. The Infrastructure Delivery Plan 2023 also identifies future infrastructure and service needs for the borough.</p>
550	Joan Gibson	Comments regarding Heathfield and Whitton wards	<p>Last but not least - I cannot find this document this time around - but there is a document describing wards and what is important about them. The Heathfield and Whitton wards were not given much praise, but a key aspect of the Heathfield ward was missing. The Heathfield ward is fairly unique in the UK as it has low cost or social housing right next to parks such as Heathfield Recreation Ground and Hounslow Heath. This is key in reducing inequalities in access to green spaces and, encouraging health and wellbeing for people on low incomes. This aspect of the Heathfield ward needs to be recognised, protected and used as an example for the rest of the borough.</p>	<p>It is difficult to know if this is a current or previous document – it could have referred to past publications around the Village Plans or the Village Planning Guidance SPD for Whitton and Heathfield. However, we have considered this in light of current guidance and assumed this comment could relate to the character profiles set out in the Urban Design Study. This document identifies (p. 29) Heathfield Recreational Ground as being one of countless smaller parks and commons in the borough which provide value for local communities, as well as forming part of a continuation of the natural-feeling environment of the River Crane and Crane Park, enclosed from surrounding housing estates by mature vegetation, through several open spaces (p. 132). Hounslow Heath is also identified (p. 132) as separating the area from further development to the west and bordering the residential grain) p. 134). These characterisations are reproduced in the text of the place-based strategy. The policy section also makes clear the requirement to consider opportunities to improve access to existing open spaces and/or provide new publicly accessible open space. Where a proposal comes forward for a residential scheme, this would need to comply with Local Plan Policies 11. Affordable Housing and 13. Housing Mix and Standards, which relate to affordable housing provision and tenure, thus the Council would expect a residential scheme to include a policy-compliant level of affordable housing and where appropriate (i.e. depending on the scale of development), would look to ensure that the open space policy aspirations set out in the place-based strategy are explored. It is therefore considered that the existing text is sufficient and no amendments are required based on this comment.</p>
551	Emma Penson, DWD on behalf of Dukes Education Group and Radnor House School Limited	Place-based Strategy for Whitton & Heathfield	<p>Disagree with:</p> <ol style="list-style-type: none"> 1) The Vision for Kneller Hall which states that: "There are some development sites that provide the opportunity to develop new character, including to ensure Kneller Hall will lie at the heart of the Whitton community, through a viable long-term use protecting its heritage significance and opening up the site to include community uses along with a new public park". 2) The statement within the Policy section which states that "Open spaces that are currently not publicly accessible, such as Kneller Hall, will be encouraged to make them available for public access and use". 3) The statement at the end of the Policy section where Site Allocation 20 is discussed and which states: "with the opportunity to open up for community access including a new public park offering recreation and leisure as well as informal play and wildlife habitats". <p>For the reasons set out in the attached letter prepared by DWD dated 31 January 2022 that accompanies this submission, the site cannot provide a new public park or be publicly accessible. Any access for the community must be managed, to ensure the safety of pupils at the site. [See comment 560 in relation to site allocation]</p>	<p>Please see response to Comment 560.</p>
552	Lynda Hance	Place-based Strategy for Whitton & Heathfield	<p>It's out of date already: 3 In the Whitton/Heathfield section I could find no mention of how you intend to address the provision to realise the borough's ambition for all cars to be electric in a very few years' time: you need to have plans for every lamp post to be converted to a charging point, because the majority of roads don't have the space for parking and allocated charging points. 4 Turing House school will have a major detrimental impact on transport in/through Whitton, yet no mention is made of alleviating this in the short term; current road layout amendments have merely 'prettified' the two junctions in Hospital Bridge Road where roundabouts would have made more sense. You need to add provision for a transport review in the short term.</p>	<p>The Borough's Electric Vehicle Recharging Strategy 2016-2026 sets out the vision that Richmond's residents and businesses will be able to use electric vehicles every day and for any purpose; they will be confident that they will be able to recharge them quickly and conveniently, taking advantage of their lower cost operation and in doing so helping improve air quality. The latest update on plans setting out additional EV charging infrastructure in the borough were published at the March 2022 Transport and Air Quality Committee. The strategy set out the programme of 140 lamp column ChargePoint's for the borough, with procurement completed and delivery underway, as well as a trial of EV only parking bays. There were at that time a total of 431 publicly accessible electric vehicle charge point sockets on the borough's public highway. Much of this may fall outside of the remit of the Local Plan, although some will be achieved through new development.</p> <p>The strategy will be achieved via, inter alia, the requirement of private developers and landowners to provide EV charging on their sites. The supporting text for</p>

				<p>Policy 47. Sustainable Travel Choices states that the policies on Sustainable Travel Choices and Parking in the Local Plan should be read alongside those in the London Plan and the Mayor of London’s Transport Strategy. Policy 48. Vehicular Parking Standards, Cycle Parking, Servicing and Construction Logistics Management requires developers to provide off-street vehicular parking, including EV charging points, in accordance with London Plan standards. There is no national, regional or local strategy which states that all cars must be electric within the immediate future; more, there is a policy direction to encourage and promote low emissions and active travel, including electric cars. The place-based strategy for Whitton & Heathfield makes clear that development is expected to consider opportunities to reduce the dominance of cars and promote active travel. A minor amendment has been made to include the improvement of air quality. The text as amended is considered sufficient to allow for the encouragement of EV charging, which would also be a requirement under existing policies in the Local Plan and London Plan. How and where this would be provided would be dependent on the location of the development and surrounding context, and would be a matter of detail to be assessed at planning stage. No further amendments are required.</p> <p>The comment relating to Turing House school relates to planning application ref. 18/3561/FUL for which planning permission was granted 23/04/2020 for a new secondary school and sixth form, and is not a direct comment on the place-based strategy itself. The officer report for the application acknowledged that the proposal would result in a significant uplift in vehicle and pedestrian movement to and from the site in the morning and afternoon peak periods, but noted that various on and off-site highway works and mitigation measures were proposed, in addition to soft measures to encourage sustainable forms of transport, and on that basis the Council’s Transport Officer advised that the proposal can be accommodated on the surrounding highway and footway network without resulting a severe impact on pedestrian and highway safety subject to the proposed mitigation measures, general site access arrangements (i.e. segregated pedestrian/cycle way), an additional pedestrian access to the site which would help even demand across the highway network as well as the provision of a zebra crossing. The provision of a zebra crossing was noted to be subject to further detailed design and satisfactorily passing further safety auditing, and through this process, it was noted that consideration could be given to amended, additional or alternative safety measures necessary to ensure pedestrian and highway safety, the costs of which would be fully met by the applicant. It is therefore considered that transport implications arising from Turing School have been fully considered, and scope to assess these further is already provided for. The place-based strategy does reference the need for consideration of the reduction in dominance of cars and the promotion of active travel. It is not considered necessary to amend the text. See also the response to comment 549 in relation to progress of the Hospital Bridge Road corridor movement study.</p>
-		Site Allocation 19: Telephone Exchange, Ashdale Close, Whitton		
553	David Wilson, Thames Water	SA 13 Telephone Exchange, Whitton	<p>Thames Water Site ID: 54327</p> <p>Water Response On the information available to date we do not envisage infrastructure concerns regarding water supply network infrastructure in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ</p> <p>Waste Response On the information available to date we do not envisage infrastructure concerns regarding wastewater network or wastewater treatment infrastructure capability in relation to this site/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ</p> <p>Additional Comments With regard to SURFACE WATER drainage, Thames Water would advise that if the developer follows the sequential approach to the disposal of surface water and aim for greenfield runoff rates we would have no objection. Where the developer proposes to</p>	<p>The impact of development on water resources and infrastructure can be assessed as set out in Local Plan Policy 9. Water Resources and Infrastructure and it is therefore not considered necessary to refer to this in the Site Allocation. The updated Infrastructure Delivery Plan 2023 also identifies future infrastructure and service needs for the borough. The Site Allocations format has been amended to include a description of the site/wider area and relevant constraints, to include identification of the flooding constraints for each site. Flood risk / SuDS matters are covered in Policy 8 ‘Flood Risk and Sustainable Drainage’ of this Plan, with which any future planning application would need to comply. The inclusion of informatives would be relevant to any future decision notice and it would not be appropriate to include this in the Site Allocation. Thames Water would be a statutory consultee for any future planning application and would have the opportunity at that stage to recommend informatives. It is therefore not considered necessary to set out the requirements of developers for this in the Site Allocations. No amendments to the Site Allocation text are necessary on this issue.</p>

			discharge to a public sewer, prior approval from Thames Water Developer Services will be required. Should you require further information please refer to our website.	
554	Jon Rowles	Site allocation 19: Telephone Exchange, Ashdale Close, Whitton	- I suggest that a requirement to provide for an extension to the Library Way carpark is added as this will enable some car parking to be decanted from the high street and other areas that will reduce curbside conflict and enable the increased provision of cycle lanes.	The Site Allocation identifies an opportunity for comprehensive redevelopment of the site, which should ensure that the site establishes a positive relationship with the surrounding area, including car park, library and High Street. There is therefore an option for this suggestion to be explored as part of development relating to the Site Allocation. Given that such an action would require in depth transport testing and consultation, it is not appropriate at this stage to cite it specifically as an aspiration. No amendments to the text are required.
-		Site Allocation 20: Kneller Hall, Whitton		
555	Katie Parsons, Historic England	Site 22: Kneller Hall	<p>We note that an SPD for this site was adopted in 2020 and that this was accompanied by a heritage assessment. We welcome the emphasis upon the reuse of historic buildings within the site. The analysis in the heritage statement helps form a useful baseline to determine how the site might be taken forward in a sustainable manner. When we commented on the draft SPD in 2019 we noted that the area currently identified for greatest potential change includes at least one building (the Band Practice Room) that has been identified as being curtilage listed and is ascribed moderate heritage significance, which could benefit from further analysis. Reference should be made to the presence of this curtilage listed building to avoid issues arising further along in the planning process.</p> <p>The site is located within a Tier 2 Archaeological Priority Area, a Desk Based Assessment, and potentially pre-determination fieldwork, will be required to support future development proposals. There is below-ground potential for a medieval moated enclosure and the remains of medieval Whitton. Nearby sites have revealed evidence for prehistoric and Roman activity, so it's possible that there will be remains pre-dating the medieval moated site and settlement. The post-medieval landscape garden remains associated with Kneller Hall should also be taken into account in design proposals. GLAAS should be consulted at an early stage to advise on place making and public benefit.</p>	<p>Overall support for the reuse of historic buildings and use of SPD as a baseline noted.</p> <p>The reformatted Site Allocations include a 'Context' section within which reference is now made to the Band Room under the heading 'Description of the current site character'. No further amendments are considered necessary.</p> <p>The reformatted Site Allocations identify where sites are located within an Archaeological Priority Zone. The Site Allocation for Kneller Hall references its location in the Whitton Archaeological Priority Zone. The Council's Validations Checklist requires the submission of an archaeological desk-based assessment for any future development and GLAAS would be a statutory consultee as part of the planning application process. It is therefore not considered that any further amendments to the text are required.</p>
556	Gary Backler, Friends of the River Crane Environment (FORCE)	Site Allocation 20: Kneller Hall, Whitton	We support the requirement that "Any redevelopment of the scheme should provide habitat enhancement through the creation of an east-west habitat corridor." We would like an explicit requirement to de-culvert and naturalise Whitton Brook, which would have temperature-cooling, flood-attenuation and ecological benefits.	Support for requirement of habitat enhancement and creation of an east-west corridor noted. The Kneller Hall SPD identifies, as part of the need for drainage attenuation areas with the site, the opportunity to incorporate SuDS features as part of the landscape strategy and reflect historic drainage patterns and the former lake located in the north east of the site which is of historical value. The SPD goes on to suggest that removing Whitton Brook from its culvert as part of any SuDS strategy would support this opportunity. The Site Allocation already makes clear that future development will need to have regard to the SPD, and so there is no need to repeat the specific details contained with that document in the text for the Site Allocation. No amendments are required.
557	Vicky Phillips, Habitats & Heritage	Site Allocation 20: Kneller Hall, Whitton p83	We support the provision of public open space put forward in the Kneller Hall SPD linking to the wider work being done to improve access to the Duke of Northumberland River by the Crane Valley Partnership and others. We hope the recent sale to Radnor House School will not interfere with this vision.	Support for the provision of public open space and improved access to the Duke of Northumberland River noted. The comment regarding the sale of the site is not a direct comment on the text of the Site Allocation itself, noting that ownership issues are not a planning matter. No amendments to the text are required.
558	Lynda Hance	Site Allocation 20: Kneller Hall, Whitton	It's out of date already: 1 The sale of Kneller Hall to Radnor School is agreed and progressing, yet the plan is written as though the future of Kneller Hall is unknown and the plan speculates on what the site development might be.	The Site Allocation recognises the sale of the site to Dukes Education Group, who operate Radnor School, and that they have submitted a planning application which is currently under consideration. However, land ownership matters are not a planning matter and that a planning application has been submitted does not influence the Council's preferred development outcomes for the site. The applicant's proposal is being considered as part of the normal planning process, and the Site Allocation is intended to be a material planning consideration as part of that process. No amendments to the text are required.
559	Jon Rowles	Site Allocation 20: Kneller Hall, Whitton	- I oppose the idea that a residential quarter is built on the western edge of the site. This would result in pressure to build on some of the Metropolitan Open Land in time. There is a clear pattern of schools having to expand as the school curriculum expands and the school will need space to adapt over the coming years. The site also has clear heritage value, and cramming in more residential accommodation in the western area will have a negative impact on the setting of the listed Kneller Hall and listed boundary wall.	<p>The Site Allocation is based on the adopted Kneller Hall SPD, which identifies an opportunity for residential development on the western part of the site, provided that, inter alia, the form and layout can demonstrate a positive relationship to the Grade II listed Hall and provides a positive visual relationship with the MOL and the habitat corridor. These requirements are repeated in the Site Allocation itself, which also makes clear that development in the MOL would not be supported. It is also noted that Historic England have raised no in principle objection to a residential use on site, in their response to the Local Plan Regulation 18 consultation. No amendments to the text are required.</p> <p>Radnor House School is a private school and would be responsible for its own pupil place-planning strategy. Any future submission would need to be accompanied with evidence to demonstrate that the facilities meet an identified need, as per Part B of Local Plan Policy 49. Social and Community Infrastructure. That a school may want to expand, does not automatically mean that it would be able to, as this would be subject to the relevant planning permissions, the</p>

				<p>assessment for which would include the need to meet the requirements of the Site Allocation as a material planning consideration, including those set out above relating to heritage and designated open land. No amendments to the text are required.</p>
560	Emma Penson, DWD on behalf of Dukes Education Group and Radnor House School Limited	Site Allocation 20: Kneller Hall, Whitton	<p>DWD has been instructed to submit representations on behalf of Dukes Education Group and Radnor House School Limited on the Draft Local Plan Pre- Publication Regulation 18 Consultation. The submission comprises of this letter and a completed 'Response Form'. It focuses on our client's interest in Kneller Hall, 65 Kneller Road and draft 'Site Allocation 20: Kneller Hall, Whitton'.</p> <p>This letter sets out:</p> <ul style="list-style-type: none"> • The ownership of the Kneller Hall site; • Background to Dukes Education Group and Radnor House School; • The site owner's proposals for Kneller Hall; and • A response to the draft Site Allocation 20, in the context of our client's proposals for the site. <p>Kneller Hall's Ownership</p> <p>The site was formerly a Royal Military School of Music, which included residential accommodation and was owned by the Ministry of Defence (MOD). They vacated the site in Summer 2021. The freehold interest of the entire site, totalling 9.7 hectares, was acquired by Radnor House School Limited, which is part of the Dukes Education Group, from the MOD in quarter 3 of 2021. Pre-application discussions are taking place with the London Borough of Richmond (LBR) in connection with our client's proposals to convert the site to a day school (ref. 21/P0412/PREAPP). A planning performance agreement has also been entered into with LBR.</p> <p>Dukes Education Group and Radnor House School</p> <p>Dukes Education is a family of UK nurseries, schools and colleges united by a common purpose; to give children the foundations for an extraordinary life through education. Founded in 2015 by its chairman Aatif Hassan, Dukes Education has 23 schools and colleges, and 20 nurseries, with sites across London, Cambridge, Kent, and Cardiff.</p> <p>Dukes Education also owns and runs wraparound advisory services and summer schools at each stage of the education journey, from academic summer schools to university application consultancy services. Dukes is a dynamic, future-focused organisation committed to providing a gold standard of education for young people in the UK.</p> <p>Dukes have significant experience operating schools in listed buildings and restoring listed buildings. In recent years, Dukes Education converted a Grade II listed office building in the London Borough of Hackney to a primary school, for The Lyceum School. In the City of Westminster, a Grade I listed building at 106 Piccadilly was converted to facilitate occupation by Eaton Square School. Eaton Square School also occupy a number of other listed properties within the City of Westminster. The existing Radnor House School, at Pope's Villa, Cross Deep falls within the Grade II listed Pope's Garden parks and gardens designation. Radnor House is part of the Dukes Education Group. Radnor House is an independent selective co-educational day school, currently located at Pope's Villa, Cross Deep, Twickenham, London, TW1 4QG. Radnor House pupils learn in small classes with a strong focus on individual attention. The school educates girls and boys from ages 9 (Year 5) to 18 (sixth form), with three main entry points in Year 5, Year 7 and Year 12.</p> <p>The existing school is approximately a 1.6 mile walk south-east of Kneller Hall. The school is currently at full capacity. The school's Department for Education capacity is 440 pupils. This is also the pupil capacity approved under planning application reference 12/4030/VRC.</p> <p>The school wishes to expand, to enable it to improve the facilities that it provides to existing students and also to further grow the school. Dukes Education has been searching for a suitable additional property in the local area for a number of years. It is proposed that all pupils in Years 7 to 11 and in the sixth form, who are currently located at Pope's Villa, will be relocated to Kneller Hall. Whilst initially the school will only accommodate pupils that have moved across from the Pope's Villa site, each year the school will grow in size, with additional forms being introduced. It is expected that the Kneller Hall site will have capacity for up to a total of 750 pupils.</p> <p>Pope's Villa will then solely be used for Year 5 and 6 pupils (junior school). The school will grow in size and will be a junior school to accommodate up to approximately 300 pupils.</p> <p>The two sites will be self-contained, providing all the facilities that pupils require and therefore pupils and staff will not need to move between the existing and proposed site. However, pupils at the Pope's Villa site, will travel on minibuses to Kneller Hall to access the proposed sports facilities.</p> <p>Approximately 90 of the circa 100 staff members at Radnor House currently employed to support the existing Year 7 to 11 and sixth form will move across to Kneller Hall. Further staff will be employed at Kneller Hall as pupil numbers increase. It is expected that there will be circa 50-60 additional staff members employed at Kneller Hall working across teaching, maintenance, catering and groundskeeping, resulting in a total of circa 150 staff at the Kneller Hall site, once the site reaches capacity. It is expected that there will be circa 30 staff in total employed at Pope's Villa, when it is the junior school use only operating there. Therefore, across the two sites there will be a significant range of employment opportunities, with a net increase of circa 80 jobs across both sites.</p> <p>Proposals for Kneller Hall</p> <p>Our client's current draft masterplan for the site proposes the following:</p> <ul style="list-style-type: none"> • Use of the main Grade II listed Kneller Hall for Education Use (Use Class F1); • Use of Guard Room and Band Practice Hall for Education Use (Class F1). • Demolition of some of the existing modern buildings on the site and the conversion of other existing modern buildings to school use (Use Class F1); 	<p>Support for the cited site size noted.</p> <p>Support for the appropriate land uses identified noted.</p> <p>The Site Allocation states that, 'It is expected that the new site owners will provide educational uses but the Council would also support employment-generating uses including lower-cost units for small businesses, the voluntary sector, creative industries and scientific and technical businesses including green technology'. It is therefore considered that the Site Allocation is already pragmatic in its recognition of the current site ownership and the owner's plans for the site, whilst also outlining all of the appropriate land uses for the site. It is considered expedient to list all appropriate land uses for the site should the ownership change or a school no longer be required. Further, the onus would be on the applicant to demonstrate why a certain appropriate land use is not being proposed/is not deliverable. The points raised in the applicant's comments could be put forward at planning stage, and taken into consideration as part of the overall balance of the planning assessment. An amendment has been made to the Site Allocation text to remove the sentence 'Any proposal should provide for some employment floorspace, including offices', as employment-generating uses is already cited as an appropriate land use, though a further amendment has been made to reference 'including offices'. Local Plan Policy 23. Offices allows for non-major office development outside of town centres, and would also contribute to the Borough's identified need for an increase in office space in general, as set out in the Employment Land and Premises Needs Assessment. It is therefore considered that the Local Plan and evidence base do allow for an employment/office use on this site. A small amount of office space is considered to be complementary to the mix of uses and supported by a borough-wide need for more office space and it is therefore appropriate to retain the reference in the Site Allocation.</p> <p>The site is located in an Area Poorly Provided with Public Open Space. London Plan Policy G4 Open Space part A(3) supports the promotion of the creation of new areas of publicly-accessible open space, particularly green space, ensuring that future open space needs are planned for, especially in areas with the potential for substantial change. Part B(2) states that development proposals should where possible create areas of publicly accessible open space, particularly in areas of deficiency. Supporting text para. 8.4.3 states that new provision or improved public access should be particularly encouraged in areas of deficiency in access to public open space. Recognising that it is important to secure appropriate management and maintenance of open spaces to ensure that a wider range of benefits can be secured and any conflicts between uses are minimised. Local Plan Policy 37. Public Open Space, Play, Sport and Recreation part A states that improvements of existing facilities and spaces, including their openness and character and their accessibility and linkages, will be encouraged. Part B states that formal and informal land for sport and recreation should be linked to the wider green infrastructure network as they play an important role in creating social cohesion, encouraging and promoting healthier and more active lifestyles. Part C states that major developments will be required to provide new on-site open space in areas of Public Open Space deficiency, which will be required in addition to any external amenity space. Supporting text para. 21.29 states that open spaces, play spaces and sport and recreation facilities are important components of social infrastructure and that major development proposals should strike a balance between on-site private amenity space, semi-private and publicly accessible provision; this will contribute to creating inclusive environments and developments that integrate with existing neighbourhoods and local communities, thus fostering social cohesion. Para. 21.30 states that easy access for all residents to high quality Public Open Space, play space and other land for formal or informal recreation is important, particularly within identified areas of deficiency. Para. 21.31 states that in areas identified as being deficient in Public</p>

		<ul style="list-style-type: none"> • New build development to provide new purpose-built school buildings, including indoor sports facilities (Use Class F1); • Ancillary works to facilitate the use of the site as a school to include high quality sports facilities and a Forest School programme; and • Facilitation of managed local school and community groups access to the outdoor sports and forest school facilities. A copy of the current draft masterplan is provided at Appendix 1 of this letter [See Appendix 4 to this schedule]. The key elements of the proposal will include: <ul style="list-style-type: none"> • Restoration and maintenance works to Kneller Hall, the Guard Room and Band Practice Hall. The investment by Dukes Education into these buildings will facilitate the school use and also support the long term retention and protection of the heritage assets. • Conversion of two existing three storey buildings to the north of the existing Band Practice Hall, to provide teaching facilities, together with a 3 storey new build high quality infill link building, to provide additional teaching accommodation. • Removal of some of the modern piecemeal development that has taken place across the northern and western parts of the Site, to consolidate the built development. • Removal of existing modern buildings on the western part of the Site and the provision of a single building which will provide a multi purpose sports hall, indoor swimming pool and changing facilities. • Provision of outside sports pitches, including an AstroTurf pitch, together with ancillary changing/ storage facilities for these facilities on the eastern part of the Site. Managed access for other local schools and community groups will be facilitated by the school, to ensure that it is not only the pupils based as the site that can benefit from these facilities but also the local community. • Retention of the outside bandstand and provision of a performing arts and music hall, to retain the site’s historical musical legacy and provide an opportunity for music-based events and concerts to continue to be held at the site, including events that the public can be invited to. • Creation of a biodiversity corridor at the north of the site. This will include a Forest School programme based in an existing converted building and the creation of ecological spaces. The Forest School facilities will be able to be used by other local schools, to support the education of young people about the importance of the environment. <p>The new facilities at the site, provide the opportunity for collaboration between schools and community groups and the sharing of facilities. As part of the pre-application discussions, we will further discuss with the LBR, school/ groups that could benefit from this access and how this can be managed. Whilst our client is open to providing access to the sport and Forest School facilities, it must be managed in a way that ensures that its pupils are safeguarded and their own needs met.</p> <p>An initial structural and conditions survey of the listed building and curtilage listed buildings was undertaken by WSP in November 2021. This recommended further investigations, which are being undertaken. Set out below is a summary of the key issues that WSP identified:</p> <ul style="list-style-type: none"> • Kneller Hall: A number of the basement walls were saturated with water damage visible to the wall finishes and therefore a waterproof render repair will be required. Numerous hairline cracks were noted in the finishes across the building. However, these are not deemed structurally significant and can be attributed to thermal movement and are relatively commonplace in buildings of this age. More significant cracks were observed to the internal masonry walls to the first and second floors of the West Wing of the building. It is noted that the cracked walls do not continue down to the ground floor and appear to be supported on the timber floor structure. Further investigations are required here. Further investigations to confirm the condition of the roof are also required. Aesthetic repairs will be required to the external elevations, which should be specified by an architect/stone specialist. • Guard’s Room: Water damage to the masonry walls to the Boiler Room. Waterproofing required to the location of water ingress. Further investigations into condition of roof and bell tower needed. • Band Practice Hall: Previous remedial works have been undertaken in 1971 to strengthen the perimeter walls. Concrete encased back-to-back steel channels were installed at the corner of each roof truss, with a horizontal steel tie rod to prevent any lateral thrust from the truss loading the wall. Significant cracking to one internal wall was identified. The cracks show a portion of the wall has dropped with mortar joints no longer lining up and is indicative of differential settlement in the wall. There is also minor cracking to the concrete encasement around the channel sections installed as part of the 1971 remedial works. Remedial work is required, including the installation of helibars and underpinning. <p>In addition to the structural issues identified, the Mechanical and Electrical services and internal fit out and condition of the properties must also be considered. The building and its services are tired and run down and the building services are beyond their economic life. The building services need to be overhauled. The properties require extensive restoration works to provide good quality accommodation, that meets modern standards.</p> <p>Significant financial investment is proposed by our client to ensure the long term retention and preservation of the Grade II listed Kneller Hall and the curtilage listed Guard Room and Band Practice Hall. Costs associated with the repair, restoration and fit out works required to these three buildings have been estimated by our client’s cost consultant to amount to circa £7 million alone. Further information on the investment and costs is provided in a letter prepared by the project cost consultant, LXA, at Appendix 2. [See Appendix 4 to this schedule]</p> <p>It is apparent from the advice provided by LXA that there are considerable costs involved in restoring Kneller Hall. The existing layout of the buildings lends itself well to an education use, given that the Military School of Music were also using this building for teaching purposes. If the building was proposed to be used for an alternative use, such as residential, this would require far more extensive and significant interventions and alterations to the building, than an education use requires. The proposed use as a school is therefore considered to be the optimum use for the building in heritage terms, as it will be restored, whilst minimising the extent of alterations and maintaining the building’s historic use, which dates back to the mid 1800s, for training and education purposes.</p>	<p>Open Space, there is a requirement for new major developments to provide new on-site open space to alleviate the recreational pressures arising from future occupants and users on existing open spaces while providing new space for nature and biodiversity. The requirement in the Site Allocation is therefore consistent with policies in the Local Development Plan. The onus would be on an applicant to demonstrate why/how the development would not impact on existing open space provision in the deficient area, notwithstanding the policy requirements to improve existing provision for social cohesion and biodiversity reasons. Further, it is not considered that the provision of public access to open space automatically conflicts with a proposed school use, although the need for pupil safeguarding is recognised. Many private schools allow public access to their grounds and sport pitches on a managed basis, and this can be weighed up and managed via a Community Use Agreement at planning stage. No amendments to the text are therefore required.</p> <p>Agreement with the references to the site’s history and ownership noted.</p> <p>The Kneller Hall SPD 2020 has been subject to public consultation adopted in 2020 therefore the SPD carries weight in the decision-making process. It is not the purpose of the Site Allocation to provide a narrative of which policies and guidance have the most weight during the planning assessment, which will be the judgement of the decision-maker. However, the SPD is an adopted document and that it was adopted prior to the site changing ownership is not relevant; any buyer would have been aware of the existence of the SPD at the time of the sale, and the Council remains supportive of the appropriate land uses and broad aspirations identified in the SPD. The Site Allocation already identifies that an educational use on the site would be supported. Issues relating to viability would need to be demonstrated and tested at full planning stage, a process which the Site Allocation does not restrict, and would form part of the planning balance with regards to what can be delivered on site. No amendments to the Site Allocation text are required.</p> <p>There is a real need for housing in the borough, including affordable housing, and this site has been identified as being capable of helping meet that need. Residential uses are already identified as one of a number of appropriate land uses and the Site Allocation makes reference to the ‘potential’ for a new residential quarter. It is therefore not considered that the current wording implies that the Council expects for a residential use to form part of any and every potential redevelopment proposal. An amendment has been made to include ‘as part of any residential scheme’ in the bullet point referring to a policy-compliant level of affordable housing, to clarify that this would apply where a proposal includes a residential use, and not for every application. The Site Allocation already makes clear that educational uses are supported, and recognises that it is expected that the new owners will supply educational uses. It is not considered that any further amendments are required.</p> <p>An amendment has been made to remove ‘any residential development’ from the requirement that development is sensitive to the historic building and responds positive to the setting of the heritage asset, as this requirement applies to any development, regardless of its type.</p> <p>The Site Allocation is based on the SPD for Kneller Hall, which was adopted in 2020, and intended as a guide for future development. This recognises that the requirement to retain the listed boundary walls and gate piers limits opportunities for site access and development frontage onto the surrounding streets in the western part of the site. However, it does also identify the opportunity of opening up and reusing the access on Whitton Dene, and the removal or alteration of the non-listed fence to the north and east of the site to create pedestrian and cycle connections and visual links between the site and its surroundings. The Council always bears in mind that site ownerships can change and thus it is important that the Site Allocation captures the general aspirations for the site for the duration of the Local Plan period, noting too that the current owners do not have an extant planning permission for this site. It would therefore be inappropriate to remove</p>
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The site constraints include:</p> <ul style="list-style-type: none"> • MOL designation covering the eastern part of the site. • Listed status of Kneller Hall, the boundary wall and the curtilage listed buildings and the requirement to retain these buildings and ensure that new build development is appropriate in their setting. • Extensive tree cover across large parts of the site. • Ecology and wildlife corridor along the site's northern boundary. • Location proximate to a residential area. <p>[Details from table]</p> <hr/> <p>Site Area (ha): Draft Site Allocation 20: 9.72 Representations: The project architect has confirmed that they are in agreement that the site area is 9.7 hectares. Change Needed and Why: None.</p> <hr/> <p>Site Proposal:</p> <p>Draft Site Allocation 20: Appropriate land uses include residential (including affordable housing), educational use, employment and employment generating uses as well as social infrastructure uses, such as health and community facilities. Representations: The policy recognises that a range of different land uses may be acceptable at the site, including educational uses and social infrastructure uses. The flexibility on the potentially suitable land uses that the policy acknowledges is considered appropriate. Our client's proposals fall within the land uses considered to be appropriate. It is noted that the site has a number of development constraints, as a result of the site designations and therefore this limits the quantum of development possible at the site. It also limits the range of uses and also the number of different uses, that can feasibly be delivered. Change Needed and Why: None.</p> <hr/> <p>Draft Site Allocation 20: Any proposal should provide for some employment floorspace, including offices. Representations: The proposed education use will provide employment at the site, including teaching, administration, catering, groundmen, gardening and maintenance roles. It is expected that when the school reaches capacity, it will employ circa 150 staff at the site. It is not intended that separate office floorspace will be provided. The proposal to provide office floorspace conflicts with draft policy 23 Offices, which states that <i>"The Council will support appropriate new office development by the following means:</i></p> <ol style="list-style-type: none"> <i>1. Major new office development should be directed within the five town centres</i> <i>2. Smaller scale office development should be in suitable locations, particularly within the designated Key Business Areas as identified on the Policies Map"</i> <p>The site is not located in a town centre or a designated key business area. It is therefore not considered to be a suitable location for new office floorspace. The Employment Land and Premises Needs Assessment (December 2021) prepared for the Council by Stantec does not identify a specific need for office floorspace in this location. At paragraph 7.38 of the report it states that <i>"Richmond Town Centre is the Borough's strongest and best location to focus any additional office growth, justifying prioritisation over Twickenham and the other centres where this explicit prioritisation of new office space would not be justified."</i> The Assessment also notes that the Draft Local Plan's office requirements may need to be updated to reflect a weaker office market, as a result of COVID- 19's impact on working patterns, as it passes through examination. Change Needed and Why: It is considered that this sentence should be removed from the allocation entirely. For the reasons set out in the 'Representations' column, there is no justification for office floorspace to be required in this location and it conflicts with draft policy 23 which directs new office floorspace to town centre locations and key business areas. The site does not fall within either of these designations. The proposed education use at the site will provide employment opportunities and therefore it is not considered appropriate to deliver specific employment floorspace. The site is very constrained and the school needs the entire site to deliver their aspirations for the school use, there is not surplus land available for separate employment uses.</p> <hr/> <p>Draft Site Allocation 20: The Council will expect the playing fields to be retained, and the provision of high quality public open spaces and public realm, including links through the site to integrate the development into the surrounding area as well as a new publicly accessible green and open space, available to both existing and new communities.</p>	<p>references to the need for active frontages and visual and physical links into the wider community. The onus would be on the applicant to demonstrate that all opportunities to achieve this have been explored. No amendments are required.</p> <p>General support for the height parameters noted.</p> <p>General support for the expectation that the new site owners will deliver an education use is noted.</p> <p>The Site Allocation's reference to social infrastructure and community uses states 'such as leisure, sport and health uses' (emphasis added). It is therefore considered that there is already sufficient flexibility in the wording. The Site Allocation is based on the recently adopted SPD masterplan for the site and sets out the general aspirations for the site for the next Local Plan period. The Site Allocation identifies a range of appropriate land uses for the site, not just an education use, thus it would not be expedient to reference the need for social/community uses in isolation with the educational use one. Detail of how this would be delivered would be a matter for consideration at planning stage. No amendments to the Site Allocation text are required.</p> <p>General support for the retention and possible upgrade of the existing playing fields, and need for consideration of ecology benefits, noted.</p> <p>The Site Allocation already makes clear that the site is the former home of military music. No amendments are required. General support for the restoration and enhancement of Kneller Hall noted.</p> <p>An amendment has been made to reference the opportunity to consolidate and reprovide the current footprint within the MOL in a new building, subject to scale, massing and impact on character and openness, for consistency with the wording in the site SPD.</p> <p>General support for habitat enhancement and creation of an east-west habitat corridor noted.</p> <p>General support for design objectives and guidance requirements noted.</p> <p>General agreement with ownership reference noted.</p> <p>The comment that the owner intends to open the school at the site in September 2023 reflects their ambitions, although a planning application is under consideration at the time of writing. It is therefore considered there is no conflict to retain the estimated timescales for development as originally cited, noting that it is flexible with short and medium expected implementation timescales also included.</p>
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		<p>Representations: The existing playing fields on the far east of the site will be retained and used by the school, with more formalised sports pitches introduced, including an all- weather AstroTurf, to support the school’s sporting requirements. Managed access for other local schools and community groups to these facilities could also be provided. In order for the sports pitches to be useable, it will be necessary for a building providing changing, WC, shower and storage facilities to be provided on the east of the site, close to the sports pitches. The site is not currently publicly accessible and nor was it whilst the MOD occupied the site for the Military School of Music. Providing public open space and links through the site conflicts with the proposed school use, which must prioritise pupil safety and manage access. Our client is open to providing managed access to the outside sports pitches, so that the sports pitches, and associated ancillary facilities, can be used by local schools and community groups, as well as Radnor House School pupils. In addition, managed access for other local schools can be provided to the Forest School facilities and the ecological corridor. Access to this facility must be managed in a way that ensures that the pupils are safeguarded and their own needs met. Furthermore, to retain the site’s historical legacy, Dukes Education will continue to use the existing outside bandstand. This provides an opportunity for music-based events and concerts to continue to be held at the site, including events that the public can be invited to. Therefore, whilst our client is open to providing managed access to certain parts of the site, it is not feasible or appropriate for open access to be provided. The proposals for the site will result in it becoming more accessible to local community groups and schools, than the site currently is. However, to provide designated publicly accessible green and open spaces is not deliverable, effective or justified.</p> <p>Change Needed and Why: The following requirement should be removed: <i>“the provision of high quality public open spaces and public realm, including links through the site to integrate the development into the surrounding area as well as a new publicly accessible green and open space, available to both existing and new communities.”</i></p> <p>There is not currently public access to the site and it is not feasible to introduce this, as it would conflict with the proposed educational use and pupil safeguarding. Is not deliverable, effective or justified to include a requirement for public open access and public links in the Local Plan. Instead, management access to parts of the site can be provided. This will ensure that the site better serves local community groups and schools than it currently does, whilst ensuring that pupil safety is not compromised.</p> <p>-----</p> <p>Context:</p> <p>-----</p> <p>Draft Site Allocation 20: Kneller Hall, was the ‘home of military music’, occupied by the Royal Military School of Music, for over 150 years. Representations: Agreed Change Needed and Why: None.</p> <p>-----</p> <p>Draft Site Allocation 20: Defence Minister Mark Lancaster announced the release of Kneller Hall on 18 January 2016. The site was eventually sold to Dukes Education who run Radnor House, an Independent School based in Twickenham. Representations: Agreed Change Needed and Why: None.</p> <p>-----</p> <p>Draft Site Allocation 20: Adopted in 2020, the Supplementary Planning Document for Kneller Hall sets out the masterplan for the site. Representations: Agreed, however it is noted that a Supplementary Planning Document (SPD) is not part of the development plan. Whilst public consultation was undertaken as part of the SPD’s preparation, it was not subject to an independent examination and therefore does not hold the same weight in planning decisions as a Local Plan. This SPD was also prepared prior to our client’s acquisition of the site and when it was not known who would acquire the site, when it was taken to the market and disposed of by the MOD. Change Needed and Why: It should be acknowledged in the site allocation that the SPD was prepared prior to the acquisition of the site by our client; at a point when the proposed future use of the site was not known; and also at a point when work to ascertain the cost of repairing and restoring the listed building was not known. The allocation should also acknowledge that the masterplan for the site included in the SPD, provides one potential option for the site, but as a result of the current landowner’s intentions and the constraints of the site, the masterplan needs to evolve from the version included in the SPD.</p> <p>-----</p> <p>Draft Site Allocation 20: There is potential for a new residential “quarter” to be created towards the west of the site as set out in the SPD. Any residential development will need to respect the existing listed Kneller Hall, the site’s setting within the historic core of Whitton and ensure that any proposal integrates well within the existing surrounding area and existing Whitton community. Representations: At the initial master planning stage our client explored the potential of delivering residential development on the far western part of the site. However, as a result of the site’s constraints there are limited opportunities for new build development on the site. The constraints include: - MOL designation covering the eastern part of the site.</p>	
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		<p>- Listed status of Kneller Hall, the boundary wall and the curtilage listed buildings and the requirement to retain these buildings and ensure that new build development is appropriate in their setting.</p> <p>- Extensive tree cover across large parts of the site.</p> <p>- Ecology and wildlife corridor along the site’s northern boundary.</p> <p>- Location proximate to a residential area.</p> <p>When taking into consideration all the site constraints, it is considered that the entire site is required to meet the school’s educational requirements.</p> <p>The far western part of the site is considered to be the only feasible location for the indoor sports facilities, outside of the MOL designation. It is therefore not possible for both residential development and an indoor sports facility to be provided.</p> <p>Change Needed and Why: If any references to residential development are included within the allocation, it should be made clear that this is one possible land use and that there is not a specific requirement for residential development. For the reasons explained in the Representations column, as a result of the site’s constraints, there is not capacity to deliver residential development alongside the education proposals.</p> <p>In addition, the text should be amended from “Any residential development will need to respect...” to “Any new build development will need to respect...”</p> <p>This revised wording better reflects the proposed educational use at the site and ensures that all new build development is required to respect the existing listed Kneller Hall.</p> <p>-----</p> <p>Draft Site Allocation 20: The design of the residential area should seek to create active frontages along Whitton Dene and Kneller Road. The layout of the residential element should be designed to encourage walking and cycling and create a visual and physical link into the existing community.</p> <p>Representations: The western boundary of the site, along Whitton Dene, and the majority of the southern boundary, along Kneller Road, is demarcated by a Grade II listed wall.</p> <p>This listed wall is protected and it is intended to be retained as part of our client’s masterplan. Draft Local Plan policy 29 (Designated heritage assets) resist the demolition of listed building and structures. This listed wall therefore limits the opportunity to create active frontages along Whitton Dene and Kneller Road.</p> <p>The school will promote the arrival of students and staff at the site on foot, cycling and via public transport.</p> <p>It is proposed that a currently closed off access on Whitton Dene will be opened up to provide vehicular and pedestrian access to the site. Access via this gate will be managed and this gate will be used for deliveries/ servicing and also to access the indoor sports facilities. Unmanaged access to the site cannot be provided, as this would result in safeguarding issues for the school. The safety and security of pupils must be prioritised.</p> <p>For the reasons explained above, as a result of the site constraints, it is not considered that there is capacity at the site to deliver residential accommodation, in addition to all the required facilities to support the school use.</p> <p>Change Needed and Why: The requirement for active frontages along Whitton Dene and Kneller Road should be removed, as this conflicts with draft policy 29’s requirement for listed buildings and structures to be retained. This requirement is therefore not deliverable.</p> <p>The requirement for a visual and physical link into the existing community, should also be removed as this is not feasible or deliverable due to the need for pupil safeguarding to be prioritised.</p> <p>-----</p> <p>Draft Site Allocation 20: There is opportunity, as set out in the SPD and the Urban Design Study 2021, for the centre of the residential area to have building heights of 4-5 storeys tapered down to 2-3 storeys on the boundaries, with any proposal in the part identified as a mid-rise building zone to be assessed against Policy 45 Tall and Mid-Rise Building Zones.</p> <p>Representations: Page 251 of the Urban Design Study 2021 states that:</p> <p><i>“Kneller Hall: Mid-rise building zone Existing prevailing height: 3 storeys Appropriate height: 5 storeys (15m)</i></p> <p><i>A Kneller Hall Masterplan Supplementary Planning Document (SPD) has been prepared to guide future development. The zone occupies a small central area in the site, identified in the SPD as having opportunity for building heights of 4-5 storeys, tapered down to 2-3 storeys on the boundaries. Any proposed buildings should respect the existing grade II listed building (Kneller Hall), ensuring they are sensitive to the significance of the historic building and respond positively to its setting, as well as other site constraints.”</i></p>	
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It is expected that our client’s aspirations for the site can be delivered within the height development parameters set out within the Urban Design Guide.

Change Needed and Why: None.

 Draft Site Allocation 20: The Council will seek a policy compliant level of affordable housing, in line with public sector land disposal.

Representations: The site does not have capacity to deliver residential development, and this does not form part of our client’s proposals for the site. The requirement to deliver affordable housing will therefore not be triggered.

Change Needed and Why: This text should be amended to stated that *“If residential development is delivered, the Council will seek a policy compliant level of affordable housing...”*.

 Draft Site Allocation 20: It is expected that the new site owners will provide educational uses but the Council would also support employment generating uses including lower cost units for small businesses, the voluntary sector, creative industries and scientific and technical businesses including green technology.

Representations: It is correct that the new site owner will provide educational uses. It is proposed that the site is used as a day school for secondary school aged and sixth form students.

A day school use provides a wide range of employment opportunities including teaching staff, administration staff, catering groundsmen, gardening, and maintenance. It is expected that when the school reaches capacity it will provide employment for circa 150 people.

There is not capacity at the site, as a result of the site constraints explained earlier in this letter, to deliver any further uses beyond the education uses and associated sports facilities proposed by our client.

Change Needed and Why: None.

 Draft Site Allocation 20: Social infrastructure and community uses, such as leisure, sport and health uses, should be incorporated and the need for such facilities should be fully explored.

Representations: Our client intends to provide high quality and modern outdoor sports facilities, including an all- weather Astro Turf pitch; indoor sports facilities including a swimming pool and to provide a Forest School for outside learning.

As part of the pre-application engagement with the Council, our client will be further exploring the local need for sports facilities. Our client can only permit access to facilities on the site, to nonpupils, provided that this does not compromise their pupil’s safety and also the pupil’s own educational need to utilise the facilities.

For this reason, access to the site for other local schools and community groups will need to be managed by our client.

Change Needed and Why: It is not considered that it will be possible for ‘health uses’ to be delivered at the site and therefore it is suggested that this is removed.

It is also considered that the phrase should be reworded, to recognise that these uses will be delivered as part of the wider school use. The following amended wording is suggested:

“Opportunities for managed access for local schools and community groups, to the leisure and sport uses, that will be delivered as part of the education use, should be explored.”

 Draft Site Allocation 20: It is expected that the existing playing fields will be retained and where possible upgraded, such as with ancillary facilities, including changing provided to support the use of the playing fields, provided that any existing ecological benefits and the openness and character of the Metropolitan Open Land is retained and, where possible enhanced.

Representations: The existing playing fields on the far eastern part of the site will be retained. This land will be used to provide sports pitches, including an all weather Astro Turf, and outside play space for pupils. The existing ancillary facilities will be replaced with modern and fit for purpose changing facilities.

Our client has appointed an ecologist who is advising them on ecology.

Change Needed and Why: None.



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Significant initial and ongoing investment will be required to restore the building and ensure its ongoing maintenance and protection.</p> <p>The proposed retention of the outside bandstand will help promote the cultural and historic legacy of the site as the former ‘home of the military music’.</p> <p>Change Needed and Why: It should be made clear that the site is the ‘former’ home of military music.</p> <p>-----</p> <p>Draft Site Allocation 20: Parts of the site are designated as Metropolitan Open Land and development in this area would not be acceptable. There is an expectation that any redevelopment proposal improves the character and openness of the Metropolitan Open Land.</p> <p>Representations: Of the total 9.7 ha site, approximately 7.2 ha is designated as Metropolitan Open Land (MOL). This equates to 74% of the site.</p> <p>There is existing built development within the MOL. The Kneller Hall SPD at page 29 states that: <i>“There is an opportunity to focus development in the western part of the site enclosed by the boundary wall. In addition, there is an opportunity to consolidate and re-provide the current built footprint within the MOL in a new building, subject to scale, massing and impact on character and openness”</i>. Page 30 also states that: <i>“Under Local Plan Policy LP 13 there is a potential opportunity to re-provide the buildings in a consolidated footprint, which enhances the sense of openness of the MOL and creates more usable space for uses which support the functioning of the Park”</i>.</p> <p>The draft allocation does not currently acknowledge the existing built development within the MOL designation or the opportunity to re-provide the existing scattered built footprint within the MOL in a consolidated footprint. This opportunity should be specified in the allocation.</p> <p>Change Needed and Why: The current wording is not considered to be justified or to reflect the current build development on the site. This part of the allocation should be rephrased to instead state that: <i>“There is an opportunity to consolidate and re-provide the current built footprint within the MOL in a new building(s), subject to scale, massing and impact on character and openness”</i>.</p> <p>The SPD acknowledged the acceptability of this approach and this should be carried through to the Local Plan. The current scattered built development within the MOL is not of architectural or historic significance and detracts from the character and openness of the MOL. The delivery of a high quality consolidated building(s), sensitively positioned within the MOL, could improve the character and openness of the MOL as opposed to the existing buildings being retained.</p> <p>-----</p> <p>Draft Site Allocation 20: Any scheme will need to ensure that the site establishes a positive relationship with the surrounding area. This should also include increased permeability for pedestrians and cyclists through the site.</p> <p>Representations: The western boundary of the site, along Whitton Dene, and the majority of the southern boundary, along Kneller Road, is demarcated by a Grade II listed wall.</p> <p>This listed wall is protected and it is intended to be retained as part of our client’s masterplan. This wall therefore limits the opportunity to open up the site or to create permeability to the neighbouring roads. Furthermore, the proposed educational use means that pupils safety must be carefully considered to ensure that a safe learning environment is created. It would not be appropriate for members of the public to have open access to the site and access must be managed by the school for safeguarding reasons.</p> <p>The proposed masterplan seeks to locate uses that there may be managed public access to, at the site boundaries and away from the main educational use. For example, the sports pitches will be accessible via the entrance on Kneller Road with access to the existing parking area to the east of the main Kneller Hall building. The indoor sports facilities will be accessed via an entrance on Whitton Dene.</p> <p>Change Needed and Why: The phrase <i>“This should also include increased permeability for pedestrians and cyclists through the site” should be removed.</i></p> <p>It is not deliverable to provide this access and nor is there any justification for it, given the position of the Grade II listed wall; the current restricted access; and also because increased pedestrian permeability for the public would conflict with the educational use.</p> <p>-----</p> <p>Draft Site Allocation 20: Any redevelopment of the scheme should provide habitat enhancement through the creation of an east-west habitat corridor.</p> <p>Representations: This forms part of our client’s proposals and specialist advice is being taken from an ecologist to explore habitat enhancement opportunities.</p> <p>Change Needed and Why: None.</p> <p>-----</p> <p>Draft Site Allocation 20: Design objectives and general guidance relating to the local character of the area, which the redevelopment of this site should have regard to, is set out in the Kneller Hall SPD and accompanying Heritage Assets</p>	
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			<p>Assessment, Whitton and Heathfield Village Planning Guidance SPD and the Urban Design Study 2021 in the character area profile and design guidance for D1 Whitton and Heathfield Residential. Representations: The design objectives and general guidance in these documents are being utilised to assist with developing the scheme proposals. Change Needed and Why: None.</p> <p>-----</p> <p>Ownership: Draft Site Allocation 20: Private (previously in public sector ownership) Representations: Correct. The freehold interest in the site is held by 'Radnor House School Limited' which is part of the Dukes Education Group. Change Needed and Why: None.</p> <p>-----</p> <p>Expected Implementation Timescale: Draft Site Allocation 20: Short- term (0-5 years), Medium (5-10 years), Long (10-15 years) Representations: Our client intends to open the school at the site in September 2023. It is expected that initially the site will only cater for the existing pupils in Years 7 to 11 and sixth form, that will move across from the existing Radnor House School site. Further development will then be built out over the next few years beyond September 2023, to facilitate the further growth of the school to cater for up to 750 pupils. The development works will need to be staggered to ensure that those pupils that relocate to the site in September 2023 learning environment is not impacted by construction works. Noisy building works are therefore expected to be programmed to take place during school holidays. Change Needed and Why: The expected implementation timescale is Short- term (0- 5 years) and Medium term (5-10 years).</p> <p>-----</p> <p><u>Summary</u> Whilst the draft Local Plan acknowledges the recent acquisition of the Kneller Hall site, the current drafting of Site Allocation 20 has not been prepared with any engagement with the site owner, given the relatively short period of time that our client has owned the site for. The 'Site Proposals' and 'Site Context' set out within Site Allocation 20 need to be amended. The current drafting is not effective, deliverable or justified and parts of the draft allocation conflict with the proposed day school use. The key amendments that need to be addressed are: - Removal of a requirement to deliver employment floorspace, including office floorspace, at the site. - Removal of the requirement to provide public access, increased permeability and active frontages at the site. Any access will need to be managed access. - Recognise that there is an opportunity to consolidate and re-provide the current built footprint within the MOL in a new building(s). - Acknowledge that the Kneller Hall SPD was prepared prior to the acquisition of the site by our client; at a point when the proposed future use of the site was not known; and also at a point when work to ascertain the cost of repairing and restoring the listed building was not known. - Acknowledge the significant financial investment and commitment to the site, and to the protection and restoration of the listed buildings, that will be required to deliver the site. - Acknowledge the constraints of the site and our client's proposals for the site, which will limit the ability to deliver further uses, beyond the education use and associated sports facilities, that are proposed by the site owner. We would welcome the opportunity to further engage with LBR's Spatial Planning and Design Team to input into the re-drafting of Site Allocation 20, to ensure that the allocation is effective, deliverable and justified. Our client intends to continue to engage pro-actively and work collaboratively with the Council's planning department through pre-application discussions, to further progress the proposals for the site and to enable a full planning and listed building consent application to be submitted.. [See Appendix 4 for extract from Masterplan and letter from project cost consultants.]</p>	
561	David Wilson, Thames Water	SA 14 Kneller Hall, Whitton	<p>Thames Water Site ID: 54328 (Reviewed Jan18) Water Response On the information available to date we do not envisage infrastructure concerns regarding water supply network infrastructure in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ Waste Response On the information available to date we do not envisage infrastructure concerns regarding wastewater network or wastewater treatment infrastructure capability in relation to this site/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ Additional Comments</p>	See response to Comment 553.


			<p>With regard to SURFACE WATER drainage, Thames Water would advise that if the developer follows the sequential approach to the disposal of surface water. As this site is largely greenfield, any development must aim for greenfield runoff rates. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. Should you require further information please refer to our website.</p> <p>Due to the recommendations within the proposed Local Plan including enhancement of habitats and the Metropolitan Open Land, we would encourage any development to utilise green SuDS solutions such as tree pits or wet ponds, as well as permeable pavements where possible.</p>	
562	Martin Ellis, South West London Clinical Commissioning Group (CCG)	Site Allocation 20: Kneller Hall, Whitton	<p>We note that site allocation for Kneller Hall (No 20) has been updated with the new owner of the site intending to transform the Grade II listed building into a school. On the western part of the site there remains an opportunity to create a mixed use ‘quarter’ with new homes, employment and community uses. The Context text refers to social infrastructure and community uses, such as leisure, sport and health uses, should be incorporated and the need for such facilities should be fully explored.</p> <p>The CCG responded to the draft Supplementary Planning Document (SPD) for Kneller Hall. The adopted SPD notes that the site falls within the catchments of GP practices at the Whitton Corner Health and Social Care Centre and Maswell Health Centre in Hounslow. The CCGs and Hounslow and Richmond Community Healthcare NHS Trust should be engaged at an early stage of the preplanning of the site to inform the approach to assessing and mitigating any impacts that may arise on the capacity of health services in the locality.</p> <p>We suggest that all options are considered, including the provision of space within the development, or developer contributions to increase capacity of health infrastructure in the area. We note the proximity of the Murray Park community hall and the Whitton Day Centre in Kneller Road and there may be opportunities to provide space to co-locate a range of health and wellbeing and community services.</p>	The impact of development on existing infrastructure can be assessed as set out in Policy 49. Social and Community Infrastructure’ Part F and therefore it is not considered necessary to refer to this in the Site Allocation. The updated Infrastructure Delivery Plan 2023 also identifies future infrastructure and service needs for the borough.
563	Laura Hutson, Sport England	Site Allocation 20: Kneller Hall	<p>Sport England is pleased to note that this site allocation specifies that the playing fields should be retained and where possible upgraded. Please also note that it is important to ensure that any other uses do not prejudice the playing fields (for example due to ball strike or noise concerns).</p>	General support for retention and possible upgrade of the existing playing fields noted. Any future planning application would be assessed against Local Plan Policy 37. Public Open Space, Play, Sport and Recreation with neighbour amenity concerns assessed against Policy 46. Amenity and Living Conditions. There is therefore sufficient provision in the Local Plan to address and assess Sport England’s comments regarding compatibility of site uses, including mitigation measures at planning stage. No amendments to the Site Allocation text are required.
-		Site Allocation 21: Whitton Community Centre, Percy Road, Whitton		
564	Martin Peace, Whitton Community Association	Chapter 9: Place-based strategy for Whitton and Heathfield - Proposed Site Allocation 21.	<p>a. Whitton Community Association is a member-led charity which has operated Whitton Community Centre since its opening in 1974. We welcome the identification of this site as a suitable location for new development as our current building has an outdated layout that does not meet modern needs, is in poor condition and is not energy efficient. The Centre is intensively used by the local community and the case for a community space in the Hospital Bridge Road area remains strong; our location is within reach of a diverse neighbourhood including some of the borough’s most deprived communities.</p> <p>b. A new community centre building at such a prominent location should contribute to character and ‘placemaking’ of Whitton and Heathfield through excellent architecture etc, in line with the aspirations in the draft Plan’s Place-based strategy for Whitton and Heathfield.</p> <p>c. More than one storey would be appropriate given the neighbouring buildings.</p> <p>d. We would not wish the site allocation policy to narrow down options for needs-based provision of community spaces across Whitton and Heathfield as a whole, by pre-determining the mix of community centre and residential at the policy site (Site Allocation 21) in particular.</p> <p>e. Any policy should encourage complementary uses to be brought together as appropriate neighbours or co-located within the same building, to support joined up services and sustainable voluntary organisations. It should encourage integrated and flexible community spaces fit for the long term.</p> <p>f. More intensive and coordinated use of sites may free up sites elsewhere for new uses (likely residential).</p> <p>g. There does not appear to be evidence or analysis to show that this would be an especially good residential site, and that appears unlikely given that every adjoining site has an institutional use or the cemetery. Therefore, it is not clear how the policy as currently worded is a useful addition given the Plan’s general policies to both protect community uses and encourage new housing development.</p> <p>h. Unusually for this borough, there is an 80-year-old ‘civic campus’ at Whitton Corner comprising a school, health centre, Homelink (day respite centre) and church alongside the community centre – this should be valued as a coherent non-residential zone with potential for greater integration in the future. We are concerned that its effectiveness could be eroded by isolated new uses (e.g. noise-sensitive residential units).</p> <p>i. The policy should draw the site boundary wider (or at least describe the context of neighbouring sites more specifically). The Local Plan is an important opportunity to create a masterplan for development that works more efficiently and releases other sites. We suggest that the site boundary should include St Augustine’s church’s temporary buildings (at our southern boundary) and the Twickenham School car park and Methodist Church sites along Percy Road.</p>	<p>General support for designation of the site as a Site Allocation in the Local Plan noted.</p> <p>The reformatted Site Allocations also include a ‘Context’ section. For this site, both Whitton Community Centre and local pharmacy are identified under the heading ‘Description of current site character’ as being a valued community service that serves the local population. Under the heading ‘Neighbour context’, the site is identified as forming one part of a parcel of land, within which is a cluster of different uses all serving the local community, including Whitton Corner, Homeline Day Respite Care Centre and St Augustine of Canterbury Church. Twickenham School is identified to the east, which also contains the Whitton Sports and Fitness Centre. It is understood that the aspirations for the Whitton Community Association relate to the broader links with the area, opportunities for creative provision, more intensive uses of the land and complementary uses.</p> <p>Policy 49. Social and Community Infrastructure Part B encourages proposals for new or extensions to existing social and community infrastructure to be of a high quality and inclusive design providing access to all and, where practicable, provided in multi-use, flexible and adaptable buildings or co-located with other social infrastructure uses which increases public access. It is not considered that the Site Allocation text as worded would preclude any of these aspirations, given the identification of the importance of reprovision of the existing community use and pharmacy. Whilst land ownership matters are not a planning consideration, it is noted that reliance on these third parties does pose some limitation challenges and thus the the focus is on the Council-owned community centre, the development of which is considered to be the most feasible in likelihood and could act as a catalyst for a more joined up approach with the neighbouring uses. An amendment to the text has been made to reflect this. No further amendments are required.</p> <p>Opportunities for ‘place-making’ can be assessed against Policy. 45 Tall and Mid-Rise Building Zones, which is referenced already in the Site Allocation text. No amendments to the wording are required. General support for the principle of a height greater than one storey is noted.</p>

				<p>With regards a proposed potential mix of social/community use and residential, this is not pre-determined in the Site Allocation other than via reference to the requirement that existing community uses (including the pharmacy) are re-provided, as per Policy 49. Whilst this policy does allow for change of use to 100% affordable housing without the need for consideration of an alternative social infrastructure use or marketing evidence submitted, the Site Allocation also reiterates that on this site, the Council is seeking a mixed-use community/social infrastructure scheme, due to the need to reprovide the existing use. Were an application to come forward which increased the social/community use offer, this could be assessed under Policy 49 via demonstration of need, and it is not considered that the Site Allocation precludes this. No amendments to the text are required.</p> <p>It is not considered that the existing uses of neighbouring buildings result in the principle of the provision of housing on this site being unacceptable, noting that Policy 49. places an emphasis on applications being in accordance with Policy 1. Living Locally. New residential development would need to comply with Agent of Change principles, as set out in Policy 46. Amenity and Living Conditions, and issues relating to noise and disturbance can usually be managed effectively via mitigation measures, planning conditions and such agreements as Community Use Statements, which could look to restrict appropriate operating hours. It is noted that there are existing neighbouring dwellings already, in the form of a terrace of two-storey terraces to the east of the site, and so any impact on neighbouring amenities would already be a consideration. No amendments to the Site Allocation are required.</p>
565	Jon Rowles	Site Allocation 21: Whitton Community Centre, Percy Road, Whitton	<p>I oppose the idea that you can build residential accommodation above the community centre as there will be incompatible land uses. How will bands, choirs, social groups, or ballroom dances that end at 1 am in the morning take place when there is housing above? The community centre is busy late into the evening, and this allocation threatens its long term future. There are very few other venues in Whitton where music can be played into the night - and this would have a very detrimental impact on the already very limited cultural scene in Whitton. There is a similar community association building in Hampton yet the council does not intend to build housing on top of it – so why is Whitton’s centre being targeted?</p> <p>A better approach will be to keep the whole site in community use, provide for the reprovision of the closed Heathfield Library (if no other site can be found), and extra community space.</p>	See responses to Comment 564 with regards the principle of residential and its compatibility with existing uses. No amendments to the Site Allocation text are required.
-		Place-based Strategy for Ham, Petersham & Richmond Park		
566	Hilary Pereira, River Thames Society	Ham, Petersham and Richmond Park: pages 92-93	<p>There are 10 bridges right across the Thames with at least one footing in Richmond (Kew railway, Kew, Richmond half-tide, Twickenham A316, Twickenham railway, Richmond, Teddington lock, Kingston railway, Kingston, Hampton Court). Some claim this is not enough, and the latest plan reiterates the call for a pedestrian/cyclist bridge between Ham and Twickenham. The outline plans to date for this have not been supported by the RTS, since they appeared to ignore the needs of navigation at high tide, also destroying mature trees and compromising existing public open space and the viability of Hammerton’s ferry. The RTS suggests the time might be right to edit out this un-costed aspiration from local plan (Ham, Petersham and Richmond Park: pages 92-93).</p>	<p>The River Thames is a major source of severance within the borough; the largest gap between road bridges is over 7km, between Richmond Bridge and Kingston Bridge. While additional studies are required to determine the economic feasibility of the bridge, and funding for the bridge is still to be found, it remains an aspiration for a new pedestrian and cycle bridge as set out in the Council’s Third Local Implementation Plan (2019). It is therefore considered the reference in the place-based strategy to this aspiration as an ‘other policy initiative’ is appropriate</p>
567	Theresa Oddelm, The Royal Parks	Place-based strategy for Ham, Petersham & Richmond Park	<p>This development area includes Richmond Park, so it is particularly relevant to The Royal Parks. Whilst we welcome the inclusion of Richmond Park within the vision, noting that it will be protected, there is no specific mention of it in the policy. The Park could be specifically mentioned when noting the network of green spaces. Furthermore, we would like to be involved further on in the plan process to ensure that any development around Richmond Park is carried out with due care and consideration for it.</p>	<p>Support for inclusion within the vision noted. Richmond Park is considered adequately protected by Policy 34, Policy 35 (through designation as MOL), and Policy 37. It is not considered necessary to repeat protection of particular parks and open space in the place-based strategies, which are linked to what future development is expected to contribute to.</p>
568	Theresa Oddelm, The Royal Parks	Place-based strategy for Ham, Petersham & Richmond Park– comments specific to biodiversity and the Royal Parks’ Environmental Designations	<p><u>Policy (page 92)</u> This should fully recognise the need to protect Richmond Park SAC, SSSI and NNR from all impacts associated with development including increased traffic, recreational pressure and light spill. Effective measures to reduce traffic in the vicinity of, and importantly through, Richmond Park should also be included.</p>	<p>Policy 39. Biodiversity and Geodiversity sets out how the protection of sites designated for biodiversity and nature conservation importance will be achieved. Recreational pressures are recognised in Policy 34. Green and Blue Infrastructure (Strategic Policy) which also links with outreach and education. Light pollution is addressed by Policy 53. Environmental Impacts. It is therefore not felt necessary to repeat all these policy protections in the place-based strategy.</p> <p>From August 2020 the Royal Parks trialled measures to reduce the impact of cut-through traffic, and in October 2022 following extensive traffic analysis announced some permanent measures. Given this has been implemented, and the Plan already recognises the importance of Richmond Park, it is not considered necessary to set out further details in the place-based strategies, which are linked to what future development is expected to contribute to.</p>

569	Tim Catchpole, Mortlake with East Sheen Society	Place-based strategy for Ham, Petersham & Richmond Park	<p>Our Society has a particular interest in Richmond Park as a large part of it lies within the boundary of the Parish of Mortlake with East Sheen (see below under strategy 13). Likewise another part of it lies within the Parish of Richmond (strategy 11). We think it illogical for the Park to be associated with Ham & Petersham alone; it should really be considered as a separate area requiring its own place-based strategy.</p> <p>The mention of London’s largest Site of Special Scientific Interest requires explanation. It is the one place in the Borough that merits a Geodiversity label – see our comments below on Policy 39. [See comment 970 on Policy 39]</p> <p>Mention should be made of the Royal Parks’ current strategy for decreasing the number of vehicles within the Park and any initiatives to introduce shuttle buses through the Park with destinations outside the Park.</p>	<p>It is recognised that Richmond Park is a distinct area, and this is acknowledged in its identification as a separate character area. If it were to be identified as a Place on its own, it would be the only Place that was one character area. The purpose of the Places as set out in the Urban Design Study is to reflect a ‘sense of place’ as well as identifying areas recognised as ‘places’ by local people. Richmond Park is closely tied to the residential areas and open spaces either side of it.</p> <p>Whilst Richmond Park is also associated with Richmond, Mortlake and East Sheen, it is considered the physical and perceptual relationship with Ham Common ties it more to the Ham and Petersham Place.</p> <p>See response to comment 970 on Geodiversity.</p> <p>From August 2020 the Royal Parks trialled measures to reduce the impact of cut-through traffic, and in October 2022 following extensive traffic analysis announced some permanent measures. Given this has been implemented, and the Plan already recognises the importance of Richmond Park, it is not considered necessary to set out further details in the place-based strategies, which are linked to what future development is expected to contribute to.</p>
570	Andrew Barnard	Plan Based Strategies 10 - Ham, Petersham	<p>Residential developments in Ham & Petersham must take account of the impact of an increased population both in respect of the development phase of new buildings and subsequently when properties are occupied. The local road infrastructure simply does not have the capacity to accommodate significantly more cars or builders lorries notably with the redevelopment of Ham Close. The answer however is not to say simplistically 'walk' or 'cycle' because not everyone can, or indeed wishes to - they prefer to use their cars for whatever reason which they have every right to do.</p>	<p>Generally there has been a notable decline in motor traffic, since the peak of total vehicle mileage on the Borough’s roads in 1999. The long term LIP target is for 75% of journeys to be made by sustainable modes by 2041. Policy 47. Sustainable travel choices ensures the impact of development on the road network will be assessed, and all major developments will need to include a full transport assessment and travel plan.</p>
571	George Goodby, Environment Agency	Place-based Strategy for Ham, Petersham & Richmond Park	<p>The local authority should include ‘improving the riverside environment’ under the ‘vision’ section. Recommended action: Include ‘improving the riverside environment’ within the vision.</p>	<p>The vision in this place-based strategy is taken from the adopted Ham & Petersham Neighbourhood Plan. Improving the riverside environment is covered by Policy 40, but add a reference in the policy about where future development may be expected to contribute to.</p>
-		Site Allocation 22: Ham Close, Ham		
572	Katy Wiseman, National Trust	Site Allocation 22: Ham Close, Ham	<p>Ham House is located approximately 0.40 miles to the south of proposed Site Allocation 22: Ham Close. The Urban Design Study 2021 identifies Ham Close as being suitable for a mid-rise building zone (5-6 storeys) with any new development to respond appropriately to the surrounding landscape and scale. Residential development between Ham House and the proposed allocation is predominantly low rise at 2 storeys, and we consider that any new development higher than four storeys would have a negative visual impact upon the setting of Ham House. We therefore suggest that the maximum building height should be four storeys at this location to avoid an adverse visual impact upon the setting of Ham House.</p> <p>Changes considered necessary: Residential development between Ham House and the proposed allocation is predominantly low rise at 2 storeys, and we consider that any new development higher than four storeys would have a negative visual impact upon the setting of Ham House. We therefore suggest that the maximum building height should be four storeys at this location to avoid an adverse visual impact upon the setting of Ham House.</p>	<p>There are existing blocks of 5 storeys in the location identified. The supporting text to the Mid-Rise Zone in Arup’s Urban Design Study 2021 considers that these existing buildings “sit well within the extensive landscape setting”. It is not considered that these existing buildings have a negative visual impact on the setting of Ham House and modelling undertaken by Arup showed that the site has potential to accommodate buildings of up to 5-6 storeys. Overall acceptability will depend on a number of factors and not just height alone, such as siting, massing, materials and design. It is further noted that there is a planning application currently under consideration which proposes buildings up to 6 storeys in height. The application includes the undertaking of an extensive Heritage, Townscape and Visual Impact Assessment, including any possible visual impact on the Home House Area. Without prejudicing the outcome of the planning application overall, it can be confirmed that Urban Design and Conservation officers within the Council reviewed the assessment and concluded that there would be no negative influence on Ham House and associated heritage assets. It is therefore not considered necessary to amend the Site Allocation to restrict heights to 4 storeys only. To address National Trusts’ concerns, it is recommended that the text is amended to require that potential impacts on the views and setting of Ham House are carefully considered.</p>
573	Rob Cummins, RHP	Site Allocation 22: Ham Close, Ham	<p>Background to the Representations RHP are currently working with Hill Residential who are the delivery partners for the Ham Close regeneration. A masterplan has been developed by Hill’s architect BPTW in collaboration with the Council. Hill Residential will shortly submit a detailed planning application for the redevelopment of the site. The description of development for the application will be: <i>“Demolition of existing buildings on-site and phased mixed-use development comprising 452 residential homes (Class C3) up to six storeys; a Community/Leisure Facility (Class F2) of up to 3 storeys in height, a “Makers Lab” (sui generis) of up to 2 storeys together with basement car parking and site wide landscaping.”</i> Consultation on the future of Ham Close dates back to 2013. The forthcoming planning application is the culmination of extensive engagement with Ham Close residents; the wider community of Ham and key stakeholders, including the local authority. The redevelopment of Ham Close will be transformative for RHP residents. The current buildings do not meet modern standards. Homes are cramped, falling below minimum space standards and there are issues of damp affecting the living conditions of tenants. Whilst RHP continue to undertake refurbishment works, all agree that a holistic redevelopment of Ham Close is needed.</p>	<p>The suggested boundary change would incorporate part of the Other Open Land of Townscape Importance (OOLTI) to the west of the site, which form part of St Richard & St Andrew’s school playing fields, and a piece of land to the east of the site which is designated as an Area Proposed for Tree Planting. The Site Allocation does not preclude development from coming forward outside of the boundary, though any such application encompassing the OOLTI would need to be addressed with a site-specific open space and needs assessment as per draft Local Plan Policies 36 and 37, and comply with Policies 38, 39 and 42 relating to greening, biodiversity and trees. An applicant would be expected to give careful consideration of the type and design of the development in these areas and it is not considered that the details of what would be required for this could be set out in a Site Allocation. With regards to the Secretary of State’s approval for the disposal of part of the playing fields, this is not a planning consideration. Sport England’s comments, whilst noted, form one of a number of consultee comments</p>

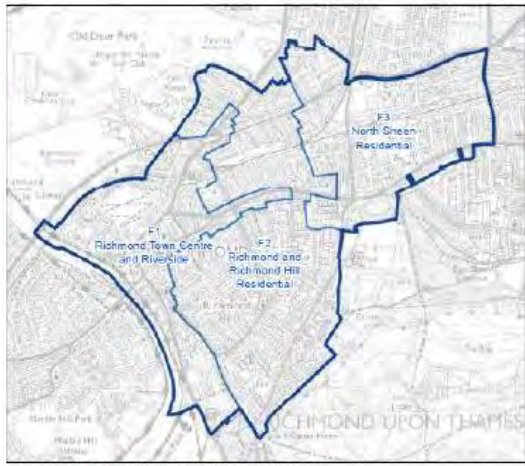
	<p>A comprehensive redevelopment will allow a number of wider improvements to the site. This will include (but is not limited to), a modern community centre, a bespoke makers lab and additional housing, including affordable housing. There will also be a number of public realm improvements, a net increase in biodiversity, the inclusion of renewable energy technologies and a number of positive climate-change measures.</p> <p>These representations seek to support the Council in bringing forward development at Ham Close.</p> <p>Site Allocation 22: Ham Close</p> <p>The site allocation includes an associated redline plan. The plan should be amended to include a western strip of land, and hard standing on the eastern edge to the rear of the shopping parade on Ashburnham Road to reflect the community led masterplan. The western strip of land is needed for the regeneration to take place and for the allocation to be delivered.</p> <p>For the avoidance of all possible doubt, the western edge has secretary of state approval for disposal to enable the Ham Close regeneration. Sport England have also been consulted on the proposals, and have provided the following comment (Pre-App Reference 21/P0449/PREAPP (23 December 2021)):</p> <p><i>“...the strip of land in question is not capable of forming part of a playing field. Having checked historical aerial photography, this strip has never been used as a playing field. It is an irregularly shaped piece of land that appears to be planted over, and is also close to trees. It is not advisable to use land too close to trees as playing field as leaf drop can present health and safety issues. Therefore Sport England would be unlikely to object to this element.”</i></p> <p>Meanwhile, the area of hardstanding to the rear of the existing shops is required to deliver the community centre. It should also be noted that the current medical centre does not form part of the masterplan, and there are no current plans to redevelop Ham Clinic.</p> <p>With the inclusion of the western and eastern elements and removal of the clinic land the site area is 4.66 hectares. Below is a diagrammatic representation of the allocation.</p> <div style="display: flex; justify-content: space-around;">   </div> <p>Figure 1: Current Allocation Plan (P94) Regulation 18 Draft Figure 2: Recommended placement Allocation Plan</p> <p>The changes to the area are necessary for the development to proceed and deliver the aspirations for the site. Furthermore, as the proposed planning application is likely to be determined in advance of the emerging local plan being adopted, RHP ask that the plan is substituted to reconcile the areas to avoid being out of date at the point of adoption.</p> <p><u>Site Proposal</u></p> <p>The site proposal for the land states</p> <p><i>“The Council supports the regeneration of Ham Close and will work in cooperation with Richmond Housing Partnership in order to rejuvenate Ham Close and its surrounding area. A comprehensive redevelopment of this site, including demolition of the existing buildings and new build reversion of all the residential and non-residential buildings, plus the provision of additional new residential accommodation with affordable housing at policy compliant levels, will be supported”</i></p> <p>The site proposal is supported.</p> <p><u>Site Allocation “Context”</u></p> <p>The context section of the allocation accords with the principles of the masterplan and is therefore also supported. The characterisation of Ham Close as a mid-rise building zone, is consistent with the evidence base (Richmond Urban Design Study 2021), and reflects the community feedback received to the masterplan proposals.</p> <p><u>Expected Implementation Timescale</u></p> <p>The allocation anticipates development to come forward in the short term (0-5 years) and medium term (5- 10 years). Upon any grant of planning permission, RHP and Hill Residential will seek to immediately bring forward development. Owing to the nature of the project, the development will be phased to reduce disruption to residents and avoid extensive decanting. RHP support the timescales reflecting these regeneration principles by including the site in both short- and medium-term periods.</p> <p>Conclusion</p>	<p>which would need to be sought as part of a planning application, and there are other issues which would also be taken into account, such as biodiversity, the open needs assessment etc. It is therefore not considered that amendments to the boundary would be appropriate, given the constraints and the level of information required to address other relevant policies in this Plan, which would need to be assessed by Development Management officers as part of the planning process, noting too that the Site Allocation's boundary does not mean that development cannot come forward.</p> <p>The aspiration to include the area of hardstanding to the rear of the shops is noted, and that utilisation of this area was requested by residents during public consultation on the master plan. It is noted not to be a highly sensitive area by virtue of an open land designation, referenced in the Neighbourhood Plan (including at section 6.6 and Policy O4 and Community Proposal 6) and so it is considered this area could be incorporated into a proposal if needed without an amendment to the Site Allocation boundary.</p> <p>The amended boundary suggested by RHP excludes the medical centre. Whilst it is noted that the medical centre is not included in RHP's masterplan for the site, the building forms part of the Ham Close estate and it is therefore rational to include it in the site boundary. That it is included in the boundary does not necessarily mean that it must form part of any future redevelopment scheme. Similarly, whilst there is a current masterplan for the site, this is not set in stone and does not preclude an amended proposal from coming forward which may include the clinic. No amendments are considered necessary.</p> <p>With regards to the current planning application which is pending a decision, this relates to only one stage of the development and does not include the land referenced in RHP's comment. In any case, whilst it is right that a Site Allocation's aspirations align with a relevant and appropriate masterplan for the site, that the boundaries might differ slightly to a masterplan or planning application does not preclude either from coming forward. No changes are therefore considered necessary.</p> <p>Support for the site proposal, context and expected timescales is noted.</p>
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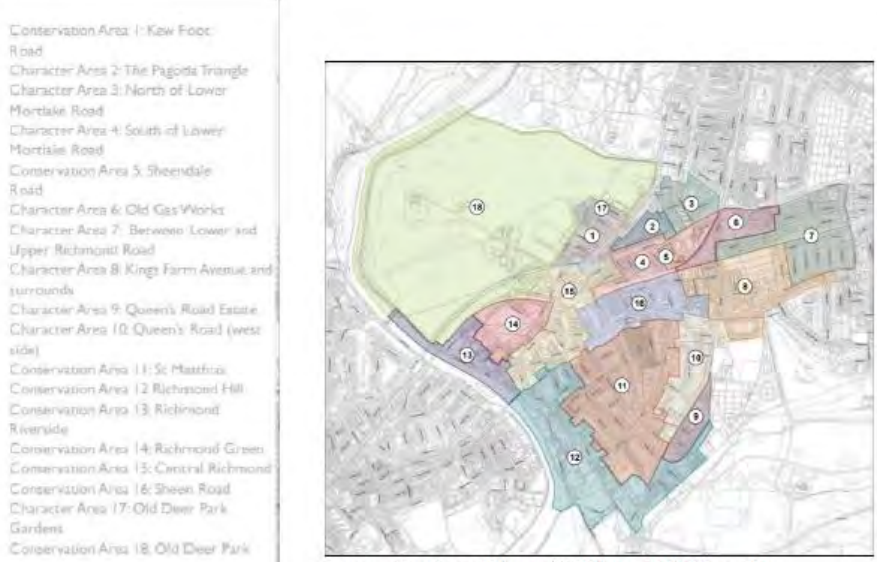
			<p>RHP support the Council in allocating Ham Close for redevelopment. A site specific designation is appropriate for such a significant development for the Borough. However, as currently drawn, the allocation excludes land that the development of Ham Close is predicated upon.</p> <p>The representations therefore seek an allocation that includes land to deliver the replacement community centre and the western strip of land on which a new makers lab will be situated together with replacement housing.</p> <p>As one of the Council’s partner affordable housing providers RHP support policy changes which will deliver more affordable homes which will benefit local residents.</p>	
574	Mark Connell, Sphere25 on behalf of Hill Residential	Place Based Strategy for Ham, Petersham & Richmond Park	<p>Within the Vision for the Ham, Petersham & Richmond Park Area, reference is made to the redevelopment of Ham Close being a “key opportunity”. The Policy for the area also cross references the site allocation stating:</p> <p><i>“At Ham Close (Site Allocation 22, Neighbourhood Plan Policy O3), the regeneration proposed is an opportunity for redevelopment to create a landmark scheme, creating a sense of identity, providing modern homes and community facilities in the identified mid-rise zone in accordance with Policy45 Tall and Mid-Rise Building Zones.”</i></p> <p>The clear policy direction and recognition that Ham Close can be a landmark scheme is both welcomed and supported by Hill residential.</p>	Support for policy direction and aspiration for a landmark scheme noted.
575	Mark Connell, Sphere25 on behalf of Hill Residential	Site Allocation 22: Ham Close, Ham	<p>Background to the Representations</p> <p>Hill Residential are the delivery partners for the Ham Close regeneration. A masterplan has been developed in collaboration with Richmond Housing Partnership (RHP) and the Council.</p> <p>Hill Residential will shortly submit a detailed planning application for the redevelopment of the site. The description of development for the application will be:</p> <p><i>“Demolition of existing buildings on-site and phased mixed-use development comprising 452 residential homes (Class C3) up to six storeys; a Community/Leisure Facility (Class F2) of up to 3 storeys in height, a “Makers Lab” (sui generis) of up to 2 storeys together with basement car parking and site wide landscaping.”</i></p> <p>Consultation on the future of Ham Close dates back to 2013. The forthcoming planning application is the culmination of extensive engagement with Ham Close residents; the wider community of Ham and key stakeholders, including the local authority.</p> <p>The redevelopment of Ham Close will be transformative for RHP residents. The current buildings do not meet modern standards. Homes are cramped, falling below minimum space standards and there are issues of damp affecting the living conditions of tenants. Whilst RHP continue to undertake refurbishment works, all agree that a holistic redevelopment of Ham Close is needed. A comprehensive redevelopment will allow a number of wider improvements to the site. This will include (but is not limited to), a modern community centre, a bespoke makers lab and additional housing, including affordable housing. There will also be a number of public realm improvements, a net increase in biodiversity, the inclusion of renewable energy technologies and a number of positive climate-change measures.</p> <p>These representations seek to support the Council in bringing forward development at Ham Close.</p> <p>Site Allocation 22: Ham Close</p> <p>The site allocation includes an associated redline plan. The plan should be amended to include a western strip of land, and hard standing on the eastern edge to the rear of the shopping parade on Ashburnham Road to reflect the community led masterplan. The western strip of land is needed for the regeneration to take place and for the allocation to be delivered.</p> <p>For the avoidance of all possible doubt, the western edge has secretary of state approval for disposal to enable the Ham Close regeneration. Sport England have also been consulted on the proposals, and have provided the following comment (Pre-App Reference 21/P0449/PREAPP (23 December 2021)):</p> <p><i>“...the strip of land in question is not capable of forming part of a playing field. Having checked historical aerial photography, this strip has never been used as a playing field. It is an irregularly shaped piece of land that appears to be planted over, and is also close to trees. It is not advisable to use land too close to trees as playing field as leaf drop can present health and safety issues. Therefore Sport England would be unlikely to object to this element.”</i></p> <p>Meanwhile, the area of hardstanding to the rear of the existing shops is required to deliver the community centre. It should also be noted that the current medical centre does not form part of the masterplan, and there are no current plans to redevelop Ham Clinic. With the inclusion of the western and eastern elements and removal of the clinic land the site area is 4.66 hectares. Below is a diagrammatic representation of the allocation.</p>	See response to comment 573.

			 <p>Figure 1: Current Allocation Plan (P94) Regulation 18 Draft</p> <p>Figure 2: Recommended placement Allocation Plan</p> <p>The changes to the area are necessary for the development to proceed and deliver the aspirations for the site. Furthermore, as the proposed planning application is likely to be determined in advance of the emerging local plan being adopted, Hill Residential ask that the plan is substituted to reconcile the areas to avoid being out of date at the point of adoption.</p> <p><u>Site Proposal</u> The site proposal for the land states <i>“The Council supports the regeneration of Ham Close and will work in cooperation with Richmond Housing Partnership in order to rejuvenate Ham Close and its surrounding area. A comprehensive redevelopment of this site, including demolition of the existing buildings and new build reprovision of all the residential and non-residential buildings, plus the provision of additional new residential accommodation with affordable housing at policy compliant levels, will be supported”</i> The site proposal is supported. It is considered that the text may benefit from the inclusion of “Hill Residential” alongside Richmond Housing Partnership. As partners and as the applicant, this will assist readers in connecting the application with the regeneration.</p> <p><u>Site Allocation “Context”</u> The context section of the allocation accords with the principles of the masterplan and is therefore also supported. The characterisation of Ham Close as a mid-rise building zone, is consistent with the evidence base (Richmond Urban Design Study 2021), and reflects the community feedback received to the masterplan proposals.</p> <p><u>Expected Implementation Timescale</u> The allocation anticipates development to come forward in the short term (0-5 years) and medium term (5-10 years). Upon any grant of planning permission, Hill Residential will seek to immediately bring forward development. Owing to the nature of the project, the development will be phased to reduce disruption to residents and avoid extensive decanting. Hill Residential support the timescales reflecting these regeneration principles by including the site in both short- and medium-term periods.</p> <p><u>Conclusion</u> Hill Residential support the Council in allocating Ham Close for redevelopment. A site specific designation is appropriate for such a significant development for the Borough. However, as currently drawn, the allocation excludes land that the development of Ham Close is predicated upon. The representations therefore seek an allocation that includes land to deliver the replacement community centre and the western strip of land on which a new makers lab will be situated together with replacement housing.</p>	
576	Rob Cummins, RHP	10 - Placed based strategy for Ham, Petersham and Richmond Park	<p>Within the Vision for the Ham, Petersham & Richmond Park Area, reference is made to the redevelopment of Ham Close being a “key opportunity”. The Policy for the area also cross-references the site allocation stating: <i>“At Ham Close (Site Allocation 22, Neighbourhood Plan Policy O3), the regeneration proposed is an opportunity for redevelopment to create a landmark scheme, creating a sense of identity, providing modern homes and community facilities in the identified mid-rise zone in accordance with Policy45 Tall and Mid-Rise Building Zones.”</i> The clear policy direction and recognition that Ham Close can be a landmark scheme is both welcomed and supported by RHP.</p>	Support for policy dorection and aspiration for a landmark scheme is noted.
577	David Wilson, Thames Water	Ham Close, Richmond, London TW10 7PL existing sewer diversion	<p>Thames Water Site ID: 49789 existing sewer diversion (PENDING) Water Response The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this</p>	The Site Allocations format has been amended to include a description of the site/wider area and relevant constraints, to include identification of the flooding constraints for each site. Flood risk / SuDS matters are covered in Policy 8 ‘Flood Risk and Sustainable Drainage’ of this Plan, with which any future planning application would need to comply. The inclusion of informatives would be relevant to any future decision notice and it would not be appropriate to include this in the Site Allocation. Thames Water would be a statutory consultee for any future planning application and would have the opportunity at that stage to

			<p>catchment. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development.</p> <p>Waste Response On the information available to date we do not envisage infrastructure concerns regarding wastewater network or wastewater treatment infrastructure capability in relation to this site/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ</p> <p>Additional Comments Management of surface water from new developments should follow London Plan Policy SI 13 Sustainable drainage, subsection B (the drainage hierarchy) and reduce to greenfield runoff rates. Where this is not possible, evidence should be supplied. As the development is located on a Brownfield site there may be existing sewers or rising mains crossing the site. Where these sewers or rising mains are to become redundant or have to be diverted the full cost of administering and undertaking the works shall be financed by the developer. Where existing sewers or rising mains cross a site and there is no practical way of their being diverted the stand off distances tabulated in the SFA 6th will be applied to assess the width of easement required.</p>	<p>recommend informatives. It is therefore not considered necessary to set out the requirements of developers for this in the Site Allocations.</p>
578	Siriol Davies, Ham and Petersham Neighbourhood Forum	Ham Close p.94	<p>The Urban Design Study identifies Ham Close as a mid-rise building zone (5-6 storeys) whilst the Neighbourhood Plan policy H2 states ' Developments over 4 storeys will be considered acceptable if the proposal demonstrates positive benefits in terms of the townscape and local aesthetic quality and relate well to the local context'. Any development at Ham Close will need to address the Neighbourhood Plan policy in this respect.</p>	<p>Amend wording so that it reflects the requirements of the Neighbourhood Plan, and the inclusion of a separate bullet point to make clear that development must take into account the Neighbourhood Plan.</p>
579	Martin Ellis, South West London Clinical Commissioning Group (CCG)	Site Allocation 22: Ham Close, Ham	<p>We note that the area includes Ham Close (Site Allocation 22, Neighbourhood Plan Policy O3), where the Council has been working with Richmond Housing Partnership to regenerate the site to provide new homes and community facilities. The CCG and Hounslow and Richmond Community Healthcare NHS Trust have been fully engaged in the emerging proposals for Ham Close. In November 2021, the CCG responded to the EIA Scoping Opinion Request for the development of the site. The site location plan in this report for the site excluded Ham Clinic. Hounslow and Richmond Community Healthcare NHS Trust will continue to provide services from the current clinic site. We suggest that the site allocation boundary is amended to reflect the current proposals for the site. The CCG will continue to engage in a future planning application for the site but have stated that whilst there is no requirement for primary care services to be relocated within the Ham Close redevelopment, the impact of the additional demand on the Lock Road Surgery may necessitate the need for a developer contribution.</p>	<p>See response to comment 573 with regards to the inclusion of the medical centre in the Site Allocation boundary.</p> <p>The impact of new development on existing infrastructure can be assessed as set out in Local Plan Policy 49 'Social and Community Infrastructure' Part F and therefore it is not considered necessary to refer to this in the Site Allocation. The updated Infrastructure Delivery Plan 2023 also identifies future infrastructure and service needs for the borough.</p>
-		Site Allocation 23: Cassel Hospital, Ham Common, Ham		
580	Heather Mathew, Richmond Council for Voluntary Service (CVS)	Area Profile 10 Ham Petersham and Richmond Park: Identified Potential site for development 23 The Cassel Hospital	<p>Area Profile 10 Ham Petersham and Richmond Park: Identified Potential site for development 23 The Cassel Hospital: Given the long-term contribution that the hospital has made to the care and therapeutic healing of people with mental illness and their families it would be appropriate to retain an element of the site as a mental health and well-being hub e.g community-based services, a partnership between health and the VCS- place based health hub.</p>	<p>The Site Allocation makes clear that development is dependent on West London Mental Health Trust's decision on how much of the site they would need to retain for their own future needs. The Site Allocation also seeks to retain social and community infrastructure uses on site in the first instance. The suggested future aspirations of the site for a place-based health hub could therefore be explored at that time and accommodated on site, therefore no amendments to the wording of the Site Allocation are required. In addition, the supporting text to Policy 51. Health and Wellbeing recognises there may be a future focus around health and social care community hubs and flexible spaces, and the updated Infrastructure Delivery Plan 2023 considers future health infrastructure needs.</p>
581	Siriol Davies, Ham and Petersham Neighbourhood Forum	Cassel Hospital p.96	<p>The draft Local Plan accepts that private development may be a way to conserve the heritage. However it should discourage proposals which would lose the potential of opening spaces and gardens to the public. Reference should also be made of the visual contribution the buildings makes to the setting of Ham Common by maintaining and enhancing views of the frontage. Disappointingly the development at the former Convent, which includes new solid gates together with the existing high walls, which make very little visual contribution to the setting of Ham Common.</p>	<p>The Site Allocation makes clear that residential uses to facilitate the protection and restoration of the listed buildings must be limited to the minimum necessary to achieve viability. An additional sentence has been added to make clear that any future development proposal would need to protect and where possible enhance the character and openness of the designated open land. The gardens are likely well used by the Hospital's patients and it may therefore not be appropriate to open them up to the public. The amended wording of the Site Allocation does however allow for this possibility, thus no further amendments are required.</p> <p>The Site Allocation already makes clear the listed status of the buildings on site, as well as identifying the many heritage assets nearby in the two conservation areas. It also makes clear that development would have to respect the significance of the heritage asset, protect and enhance the listed buildings and the Ham Conservation Area and setting. This would include, but not be limited to, an assessment of an application's impact on the visual appearance of the frontage and contribution to the conservation area. It is therefore considered that the wording is sufficient and no amendments are required.</p> <p>The comment on the former Convent is not a direct comment on the Site Allocation and no amendments are required on this point.</p>

582	Victoria Barrett-Mudhoo, Lichfields on behalf of the West London NHS Trust	Site Allocation 23: Cassel Hospital, Ham Common, Ham	West London NHS Trust strongly supports the continued site allocation of Cassel Hospital and recognition that conversion or redevelopment for residential uses could be acceptable if it allows for the protection and restoration of listed buildings. It is noted that the expected timescales for implementation are indicated as in 5-10 years. The Cassel Specialist Personality Disorder Service (CSPD) is a national service and the site is currently still in active use with staff and patients at the site. The Trust is sensitive to this position and recognise the uncertainty around if/when the site may become surplus to requirements. In this regard, the medium timeframe identified seems appropriate at this time.	Support for the Site Allocation and estimated timescale is noted.
-		Place-based Strategy for Richmond & Richmond Hill		
583	Theresa Oddelm, The Royal Parks	Place-based Strategy for Richmond & Richmond Hill – comments specific to biodiversity and the Royal Parks' Environmental Designations	<p><u>Area Profile (page 98)</u> This should include recognition of the nature conservation designations of Richmond Park as immediately adjacent to this area.</p> <p><u>Policy 9 (page 101)</u> Whilst this policy encourages 'active travel and exercise', it should also identify the need to protect Richmond Park's SAC, SSSI and NNR from impacts associated with recreational pressure, as well as other impacts associated with development, including increased traffic and light spill.</p> <p>It should also include measures to reduce traffic in the vicinity of, and through, Richmond Park.</p>	<p>Add reference to the recreational pressures and nature conservation designations into the area profile for Richmond & Richmond Hill (reflecting that this is already acknowledged elsewhere in the draft Plan, with the Park itself included in the Place-based Strategy for Ham, Petersham & Richmond Park).</p> <p>Specific mention of Richmond Park with regards to the encouragement of active travel and exercise is not considered necessary, particularly as its importance to the character of the area is identified throughout the place-making strategy for Ham, Petersham & Richmond Park. See above with regards the addition of a reference to recreational pressures and nature importance. However, a reference has been added for a policy requirement to promote exploration of the Richmond area 'via sustainable travel' and added reference to a reduction in car travel in the Richmond area and improvement in air quality. This would also apply to Richmond Park.</p>
584	Louise Fluker, The Richmond Society	p101 - Section 11 Richmond Hill and Richmond Policy	<p>we agree with the general objectives but are less convinced that Whittaker Square is a natural focus for visitors as it's not an obvious destination. We strongly agree that there should be greater provision of public lavatories and would encourage the Council to consider how this could be provided by private enterprise as in France - e.g. advertiser pays for prime advert space, the proceeds being used for public benefit.</p> <p>We agree with improving North Sheen Residential Area especially if there are housing developments on the Homebase Site and possibly on the Sainsbury's site. The changes by TfL do not encourage us that this will be achievable at least as far as public transport is concerned.</p> <p>Whilst we agree that much more could be made of the area around Richmond Station and we accept that there are few obvious areas for expansion we have doubts about siting even a building of up to 8 storeys there. We are not convinced that the area around Richmond Station is suitable for taller buildings as identified in the Plan. Creating such a cluster would change the appearance of Richmond Town Centre.</p>	<p>Support for general objectives noted.</p> <p>The objective of the policy is to set out the opportunity to create a new hub at Whittaker Square to make it a more attractive destination. A Future Vision for Richmond 2019, a place-making study commissioned by 'Be Richmond' BID, identified the creation of a new public space in Whittaker Avenue as a key opportunity for enhancement, based on its location having the potential to bind together the town centre and the towpath, allowing an easier transition between the busy high street and the riverside setting. Its siting between Richmond town centre and the Riverside, in close proximity to visitor attraction Museum of Richmond, means it is feasible that this area would attract foot traffic, hence the aspiration for its enhancement. The project is already in Phase 2 of an extended pilot scheme, with feedback from the public being overwhelmingly positive. It is therefore not considered necessary to remove this reference from the place-making policy.</p> <p>General support for the provision of public toilets is noted. The suggestion of how this could be achieved, is one such approach that the Council could consider, and it is not considered that the current wording of the policy would prevent that. Therefore no amendments are considered necessary.</p> <p>Support for improving North Sheen Residential area is noted. It is not clear which changes by TfL are being referred to. The comments are noted but it is not considered necessary to amend the aspirations for an improved area.</p> <p>General support for improvements to area around Richmond Station noted. The Urban Design Study 2021 acknowledges the considerable number of townscape constraints in the vicinity of Richmond Station. It concludes that the site does have opportunity for a well-designed landmark building up to 8 storeys. The justification for the zone is presented in Appendix A. It states that new development at the station could improve the underwhelming sense of arrival at the station, public realm and the impact of some detracting post-war development. The area for the tall building zone is set back from the high street. The analysis of an indicative building of 8 storeys indicates that setting the building back from the high street is likely to limit near distance views. It is therefore not considered that any amendments to the place-making strategy or the Site Allocation for Richmond Station are required.</p>
585	Jon Rowles	Richmond & Richmond Hill	The strategy fails to acknowledge the main challenge to Richmond town centre has been the loss of its main department store which has prompted a large number of other fashion clothing retailers to leave the town. There needs to be a strategy to rebuild the comparison good offer – otherwise, there will be a large increase in the need to travel as residents are increasingly having to	The flexibility introduced by Government allows for changes of use within Use Class E (commercial, business and service uses) and there can be considerable change without the requirement for planning permission, however the Plan seeks to set out a positive vision for the future of each area. The Retail & Leisure Needs

			<p>visit other centres further away to buy clothes and household goods. This does not appear to square with the overarching policy of enabling people to live locally.</p>	<p>Study and the Council’s retail research provide an up to date evidence base for the retail policies. Amend text to note closure of House of Fraser in the section referencing retail unit vacancies. The need to support and enhance the retail offer of Richmond town centre is already referenced at various points in the policy. Further, the former House of Fraser site has also been included as a Site Allocation, with retail included as a preferred use within a mixed use scheme. It is therefore not considered necessary to amend the wording of the place-making strategy further.</p>
<p>586</p>	<p>Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)</p>		<p>Prospect of Richmond is a group of local residents that have extensive knowledge and experience of living in or near Richmond Town and the surrounding area. Two of us have been past chairs of the Richmond Society and one a past chair of the Friends of Richmond Green and one of us chairs the Richmond Heathrow Campaign comprising the Richmond Society, Kew Society and the Friends of Richmond Green. While not part of this response we have extensive involvement with the adjacent Old Deer Park. Two are architects.</p> <p>Individually and together, we have been involved with many planning, licensing, traffic, heritage, charity, cultural and other matters. We are dedicated to the preserving and improving the area for the benefit of residents and other stakeholders. Over many years we have engaged extensively with Richmond-upon-Thames Council and are keen to continue doing so.</p> <p>Place Definitions. We refer to Richmond Town as comprising the Conservation Areas for Richmond Town Centre, Richmond Green, Richmond Riverside and Richmond Hill. The use, character and value of the four components of Richmond are very different but it is this diversity, side by side in a relatively small area, that is so valuable. The whole is greater than the sum of the parts.</p> <p>Local Plan Section 11 heading is ‘Place-based Strategy for Richmond & Richmond Hill’. The study area is defined as ‘Richmond Town Centre and Riverside, and the residential and mixed use areas into Richmond Hill and North Sheen’. These are character areas F1, F2 and F3 in the Urban Design Study 2021’. ‘Richmond Town Centre and Riverside’ (F1) is described as including Richmond Green. We believe the four components of Richmond Town should be separately identified in line with the boundaries of the Conservation Areas for Central Richmond, Richmond Green, Richmond Riverside and Richmond Hill and that the character areas should match the Conservation Area boundaries.</p> <p>Confusingly, the extant ‘Richmond & Richmond Hill Village Plan’ (2016) comprises all four areas plus Richmond and Richmond Hill residential (F2), North Sheen Residential (F3) and the Old Deer Park which is included in the Local Plan as Placed Based Strategy for Kew and has its own Old Deer Park Conservation Area Statement and SPD. We note parts of the two Riverside Conservation Areas are on the Twickenham side of the river Thames whereas the Local Plan boundary appears to be the centre of the river. We have extracted the Character Area Map from Arup’s Urban Design Study Dec 2021 and provided a Conservation Area Map so that members of the community reading our response can better understand the context.</p>  <p>Richmond & Richmond Hill, Urban design Study Dec 2021</p>	<p>Amend text in the character area profile to explicitly refer to the four conservation areas as being at the core of the town centre character area. Conservation areas and character areas represent different judgements and priorities. Whilst conservation areas aim to define aspects of heritage value, character areas aim to define areas of similar character. For consistency and ease of use, in general the character areas in the Urban Design Study 2021 aimed to follow conservation area boundaries wherever possible. However, Richmond was an example of where the conservation areas did not completely align with character – for example Richmond Riverside and Richmond Hill extend across the river into East Twickenham, and part of the Richmond Hill CA covers the riverside. The Richmond Hill CA also extends further to the south-east and encompasses areas which do not have a town centre character. Further, the character area boundary considered the town centre boundary which also does not align with conservation areas boundaries. It is overall considered that the current character areas are appropriate and no further changes are recommended.</p>

			 <p>Conservation Area 1: Kew Foot Road Character Area 2: The Pagoda Triangle Character Area 3: North of Lower Mortlake Road Character Area 4: South of Lower Mortlake Road Conservation Area 5: Sheensdale Road Character Area 6: Old Gas Works Character Area 7: Between Lower and Upper Richmond Road Character Area 8: Kings Farm Avenue and surrounds Character Area 9: Queen's Road Estate Character Area 10: Queen's Road (west side) Conservation Area 11: St Matthias Conservation Area 12: Richmond Hill Conservation Area 13: Richmond Riverside Conservation Area 14: Richmond Green Conservation Area 15: Central Richmond Conservation Area 16: Sheen Road Character Area 17: Old Deer Park Gardens Conservation Area 18: Old Deer Park</p> <p>Conservation Areas Richmond & Richmond Hill Village Plan</p>	
587	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	Place-based Strategy for Richmond & Richmond Hill	In the un-headed list of contents Section 3 is titled 'Place-based Strategy for Richmond & Richmond Hill' whereas it should be titled as 'Richmond Town Centre and Riverside, Richmond and Richmond Hill Residential and North Sheen Residential' – assuming that one accepts the highly questionable concept and structure of 'Character Areas (sic) as set out in Arup's 432-page Urban Design Study. Needs remedying.	The Urban Design Study divides the borough into nine high level 'places' which have been used to name the place-based strategies, as set out at the start of section 3 in the Urban Design Study. For simplicity these do not replicate in full the names of the 36 locally distinctive character areas. No amendments to the place-making strategy are considered necessary.
588	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	Place-based Strategy for Richmond & Richmond Hill in relation to Richmond BID.	We note the explicit reliance on the RBID and its Vision in the Local Plan Section 11 Place-Based Strategy for Richmond and Richmond Hill but we have not been able to find the Vision Report as evidence and are concerned that since the RBID is established by businesses alone and not residents there is likely to be a bias in favour of businesses. Also, the areas covered by the RBID are parts of Richmond Town Centre and not Richmond Green, for example where we wholly oppose commercial use, other than in the context of mixed use along Greenside. We are concerned that the democratic process may be at risk and while we are not saying this is intentional, we believe the matter needs to be resolved going forward. In so far as our response here is concerned, without the evidence we are not able to make a reasoned response on the RBID Vision included in the draft Local Plan at Placed-based Strategy- Richmond and Richmond Hill.	The policy mentions the current BID in the 'other initiatives' section but there is not a reliance on their work to inform the Local Plan; rather, there is a recognition that a BID exists and there has been work to set out a vision for a thriving town centre. They are a key stakeholder. That a BID has been set up to represent participating businesses, and that the BID is referenced in the Local Plan as an initiative which promotes Richmond, does not mean that the Plan itself is biased towards businesses at the expense of residents, the basis for which is based on the Council's own evidence base. Further information about Be Richmond BID can be found on their website: https://berichmond.london/member-support/about-be-richmond . Note that BIDS are funded by a mandatory levy on eligible businesses after a successful ballot in which businesses vote; the maximum period for the levy is 5 years, and to continue their activities a new ballot must be held. The preparation of the Local Plan and its implementation is the statutory responsibility of the Council in its role as local planning authority, subject to full consultation and independent Examination in line with statutory requirements. It is not considered that any amendments to the policy are required.
589	Peter Willan and Paul Velluet, Old Deer Park Working Group	General comment in relation to Old Deer Park	<p>The Old Deer Park Working Group (the Group) comprises representatives of The Richmond Society, The Kew Society, The Friends of Richmond Green, The Friends of Old Deer Park and The St Margaret's Estate Residents Association. This submission represents the joint response from the Group.</p> <p>The Group was formed in 2012 in recognition of the particular ecological, historical and recreational importance of the Old Deer Park and has since then worked for encouraging and securing the preparation of a coherent strategy for the effective conservation, development and management of the Park. In June, 2012, the Group published its report: The Old Deer Park, Richmond - Re-connecting the Town to its local park - Realising an under-recognised parkland asset – A framework for conservation and enhancement. Since then, it has made a number of submissions to the Council on related issues. In this connection and importantly, the Group worked collaboratively with the Council and its consultants on the preparation of the Old Deer Park Supplementary Planning Document (as published in March, 2018). The Group has also worked, and continues to work, collaboratively with the Council on the planning and implementation of projects for the enhancement of the Park, including the recently completed, award-winning scheme for improvements at and adjacent to the Park Lane entrance to the Old Deer Park Car-park. The Group is currently working with the Council to link the Old Deer Park car park with the river Thames along the area between the A316 road and the railway. It is working with the Council on tree planting and with Thames Landscape Strategy in rewilding the ODP section of Thames Arcadia.</p> <p>Richmond Town. We recommend that the Old Deer Park should be covered by its own Character Area but the park's access from Richmond Town and proximity encourage the consultation response from the Prospect of Richmond on Richmond Town to be considered alongside this response from the Old Deer Park Working Group on the Old Deer Park.</p>	It is not considered that the Old Deer Park warrants its own character area. The borough-wide study undertaken by Arup as part of the Urban Design Study 2021 is necessarily at a broad scale. A finer grain of detail would be reflected within a more detailed character assessment. It is therefore not considered that any amendments to the existing character areas and boundaries are necessary.

590	George Goodby, Environment Agency	Place-based Strategy for Richmond & Richmond Hill	The local authority should include 'improving/enhancing the river side environment' under the 'vision' section. Recommended action: Include 'improving the riverside environment' within the vision.	The vision focuses on town centre uses. It would be more appropriate reference enhancement of the riverside environment in the 'Policy' section, which has been amended accordingly.
591	Myrna Jelman	General comment in relation to Sheen Road pavements	Finally, I keep asking for this and I keep being told there is no budget but budgets are only decisions and you obviously decide that this is not urgent. The Sheen Road parade of shops may be a neighbourhood centre but it doesn't have even, safe pavements, even in places where there are very real risks of tripping onto a main road with buses running dangerously close to a very narrow pavement. This is year 6 of this request. I will keep asking! It is unacceptable when all other civic spaces are well taken care of.	The Council's repaving programme falls within the remit of Transport and Highways and not the remit of the Local Plan. A general, strategic policy vision for the improvement of public realm at North Sheen is already reference in the place-making strategy, as well as references to portion of active travel, which would include walking, throughout. It is not considered that any amendments to the policy are required.
Site Allocation 24: Richmond Station, Richmond				
592	Richard Carr, Transport for London (TfL)	Site Allocation 24: Richmond Station, Richmond	We welcome the stated aim of a comprehensive approach including transport interchange improvements. We would expect to be closely involved in both the development of the SPD and early discussions about potential redevelopment plans. It would be helpful to make this expectation clear in the site allocation.	General support for approach noted. Amendment to include reference to partnership working with National Rail and TfL as part of the comprehensive approach to interchange improvements. As a statutory consultee, TfL would be consulted on the amendments of the future SPD/design brief. There is therefore no requirement to amend the wording of the Site Allocation to this effect.
593	Myrna Jelman	Site Allocation 24: Richmond Station, Richmond	PLEASE plan a redevelopment of Richmond Station that includes exits from all platform onto Church Road. This will once again reduce some local car journeys for people living East of the station and provide more inclusive transport for the poorer residents also in that part of Richmond.	The aspirations set out in the Site Allocation are high level. Any future interchange improvements would require testing and also the input of Network Rail and TfL. It would therefore not be appropriate to require this level of detail in the Site Allocation and no amendments to the wording are required.
594	Louise Fluker, The Richmond Society	p103-104 Site Allocation Site 24: Richmond Station, Richmond	Presumably the development envisaged will be over the current railway lines with the tall building on the site of the car park? Although the station facade is run down, it is a Building of Townscape Merit and a good example of Art Deco and the architect is believed to be the same as for Surbiton Station which is listed. It certainly merits proper restoration so that it shows that it is the centre of a transport hub. Having a tall building over the top of the facade might not achieve the best aesthetic outcome. We certainly support having an integrated transport hub as a concept but where buses would be based is hard to envisage and relocating taxis would also be an improvement.	<p>The Site Allocation reformatting includes a description of the current site character. For the Richmond Station Site Allocation the BTM status of the station building is made clear, including an identification of which aspects of the building most positively contribute to that designation, i.e. the façade and booking hall. The policy section has been amended slightly to make clear that development must respond positively to the Conservation Area and to the BTM. Any development proposal would need to set out how the BTM is protected. The approach to building height in this area is considered sound.</p> <p>The Urban Design Study is a robust design-led evidence base document which establishes a comprehensive understanding of the context and policy background, in national policy and design guidance. The height parameters are based on a characterisation process which is informed by industry guidance set out by the Landscape Institute, Natural England and the Greater London Authority (GLA). The methodology is refined to suit the particular characteristics and constraints of the borough. This process informed an assessment for the capacity for growth by assessing the sensitivity of character areas to establish high sensitivity areas unlikely to have capacity for development without adverse effects on the townscape; alongside areas of medium and low sensitivity with the potential for targeted or larger scale growth. Simultaneously, the 'probability' of change is assessed, analysing the borough in terms of aspects such as public transport accessibility, land availability and planning policies. Sensitivity and probability are considered together to understand the potential development capacity of the borough. In determining a planning application, the Council has regard to the Local Plan as a whole and the requirements of Policy 45 would form part of that consideration.</p> <p>The UDS has identified the site as having capacity to accommodate buildings of up to 7-8 storeys. The text on p.255 highlights that the opportunities for the tallest heights are within parts of the zone, and that buildings should step down to the surroundings, as indicated by the heat map and surrounding mid-rise zone.</p> <ul style="list-style-type: none"> -The character profile on p.158 notes that there is an underwhelming sense of arrival at the station. -The design guidance on p.297 states that main roads may be able to accommodate taller buildings if stepped back. It also recommends the sense of arrival and quality of the public realm at the station could be enhanced. -The strategy for the area is to conserve and enhance the identity of specific areas (notably around the station) and the functioning of the area as a town centre. -The assessment in Appendix A on p.325 provides a rationale for the appropriate heights identified. A scenario was tested on the site, which was developed in the context of providing active ground floor uses, respecting the height of the existing locally listed station building, setting the taller element back behind the primary

				<p>frontage and noting there is potential for a new development to serve as a landmark gateway marking the arrival point in Richmond.</p> <p>The existing commercial building to the south of the station is 5 storeys (and 6 storeys to the east where the ground level drops).</p> <p>-A ZTV was produced to test the potential visibility of the scenario heights and a high level townscape, visual and heritage assessment was undertaken. The assessment concludes that there <i>'is potential for some additional height, but only where this is substantially set back within the plot and away from the road frontage'</i>.</p> <p>-The assessment notes the tall building zone is limited by the many sensitivities including the locally listed station building itself, other nearby locally listed buildings on the Quadrant and the small-scale residential character of properties to the south-east and north-east.</p> <p>It is therefore considered that the current wording is appropriate and no further changes are recommended.</p> <p>General support for an integrated transport hub is noted. The Site Allocation emphasises that this would relate to the overground and underground services, as well as improvements for cyclists. It is not envisaged at this stage that the hub would include a bus station. Support for relocating taxis is noted, though it is not considered that this needs to be specifically mentioned in the Site Allocation. Any future development proposal would require the input of National Rail and TfL. The wording of the Site Allocation is considered to be adequate for the purposes of enabling an interchange to be explored and developed. No changes are considered to be necessary.</p>
595	Jon Rowles	Site allocation 24: Richmond Station, Richmond	<p>- I do not support an air-rights development over the railway tracks. this will make public transport far less attractive. Those waiting for national rail trains often need to wait for over 25 minutes for trains to destinations such as Whitton and this would mean that the wait would be far less pleasant and will be another 'push' from using public transport.</p> <p>Richmond Station has heritage value and I feel this extends to more than just the booking hall but also included the walkways and generous circulation area at platform level where many of the original 1930s features remain such as stair rails, platform buildings, etc. Some restoration could reveal the art deco heritage further. Many people visit Richmond as they want to visit a pretty town on the river that feels less built up and less developed than central London and therefore this proposal could undermine the tourism sector in the town if there is a Hammersmith Station style development plonked on top of the main entrance from which tourists enter the town.</p>	<p>The Site Allocation is intended to be high-level with a general aspiration for what development would be appropriate on site, to include an integrated transport hub. There is no evidence at that development to the rear over the railway tracks would preclude this from coming forward, noting that no concerns have been raised by TfL to the Site Allocation aspiration on this point. Detailed particulars, such as waiting facilities and environment for users of the station, would be assessed and developed as part of the design stage. It is not considered that the current wording of the Site Allocation precludes these matters from being given full consideration as part of a future development. No changes are considered to be necessary.</p> <p>Urban Design and Conservation officers advise that the principal positive contributions to the station's BTM status are the Art Deco façade and booking hall, and that the side and rear of the building is not considered to contribute to the setting. The Site Allocation has been amended slightly to make clear that any development must respond positively to the Conservation Area and BTM. Any future development proposal would require the submission of a comprehensive Heritage Statement which would comprise a detailed understanding of the significance of the building, Conservation Area and neighbouring assets, and how the development responds to this. The aspiration of the Site Allocation for a transport interchange would also allow for consideration of the visitors' experiences at the station, which is also listed as a policy requirement in the Site Allocation. It is therefore not considered that any changes to the wording are required.</p>
596	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	Site allocation 24: Richmond Station, Richmond	<p>Both the title and the draft text of this Site Allocation need substantial amendment.</p> <p>The title should refer specifically not only to the Station, but also to the post-War, multi-storey NCP car-park to the south of the Station, the post-War parade of single-storey shops fronting The Quadrant (at nos. 27.B to 27.G) and the post-War office-block fronting Drummond's Place to the south and south-west of the Station, to the post-War parade of shops fronting Kew Road (at nos. 2 to 8 consec.) and the offices above (Westminster House) to the north of the Station, and the surface-level car-park to the north of the Station.</p> <p>A clear distinction needs to be made between proposals directly affecting the Station (together with the tracks and present day-lit, open-air platforms) and those affecting the other buildings and space referred to above. Whilst such proposals need to be coherent, they need to have regard to the substantially different considerations that apply to the present, very fine, locally listed Southern Railway Station complex (and not merely to its front façade to Kew Road and the upper booking-hall), completed in 1937, which is clearly worthy of statutory listing, together with the very fine 19th century platform-canopies serving platforms 4 and 5 and 6 and 7. Given the particular heritage significance of the Station complex - as distinct from the lack of heritage significance of the other buildings and space around the Station (the multi-storey car-park to the south of the Station, the parade of single-storey shops and the office-block fronting The Quadrant and Drummond's Place to the south and south-west of the</p>	<p>The Site Allocation comprises Richmond Station, the railway tracks to the rear, Gateway House and the multi-storey car park to the south, and Westminster House and open car park to the north. No changes to the wording are therefore required in this regard.</p> <p>See response to comment 595 with regards the heritage status of the station and the aspects of the site which are considered to most positively contribute to its designation and setting. The text as proposed would not preclude a development from coming forward which does not include the station, and vice versa. It is therefore not considered that any amendments to the wording are required.</p> <p>With regards the impact of a retail offer on site, commercial/retail uses are considered appropriate given the town centre location and an impact assessment on existing shopping centres would not be required by policy. There is an existing</p>

			<p>station, the parade of shops and the offices above fronting Kew Road to the north of the Station, and the surface-level car-park to the north of the Station), there is clearly no scope whatever for the redevelopment of the existing Station complex - or for decking-over the tracks and the present day-lit, open-air platforms.</p> <p>However, this is not to suggest that there is no scope to enhance the existing Station complex - principally by carefully reinstating and restoring its original and very distinctive architectural interest and integrity, which has long remained a desirable objective, involving the removal of a series of damaging alterations carried out over recent years. Importantly, too, any proposed decking-over of the existing platforms and tracks and the resulting loss of daylighting and natural ventilation for the travelling public would not only have a massive and damaging impact on the amenity presently enjoyed by the public using the Station, but would also be wholly inconsistent with current national, London-wide and local sustainability interests. Most importantly, any significant increase in retail, leisure and/or entertainment uses on the site is most likely to harm damage the viability and vitality of the existing and long-established retail, leisure and entertainment in the heart of the Town to the south by drawing people away from The Quadrant, George Street, Sheen Road, The Square, Duke Street, King Street, Red Lion Street, Hill Street and Bridge Street. Similarly, any significant increase in retail, leisure and/or entertainment uses on the site is likely to necessitate a significant level of vehicular servicing that could only be provided via The Quadrant or Kew Road.</p> <p>Given the fundamentally flawed analysis and recommendations contained in the relevant parts of Arup's Urban Design Study to which repeated references are made in the draft Local Plan, the suggested suitability of the Station site and its immediate setting as 'a tall building zone (7-8 storeys)... with the opportunity for a landmark building' is wholly unacceptable, unrealistic and needs to be omitted altogether.</p> <p>Importantly, there is a clear need to fundamentally review and revise the current Development Brief for the Station site which dates back to March, 2002.</p> <p>Supporting document/evidence: Urban Design Study December 2021 . Character Area F1 Central Richmond Conservation Area</p>	<p>officer on site and a re-provision and enhancement of this is considered appropriate for a transport hub. It is considered that this would be complementary to, rather than detrimental to, existing shopping areas nearby, particularly given the Site Allocation recognition that the site acts as a gateway to the Richmond area.</p> <p>See response to comment 594 with regards the appropriateness of a tall building zone.</p> <p>Support for a revised development brief for the site is noted.</p>
-	Peter Willan and Paul Velluet, Old Deer Park Working Group		[See comment 1035 in respect of Policy 45 and high rise development which refer to Richmond Station]	See response to comment 594 with regards the appropriateness of a tall building zone.
-		Site Allocation 25: Former House of Fraser, 16 Paved Court 20 King Street 4 To 8 And 10 Paved Court And 75 - 81 George Street, Richmond		
597	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	Site Allocation 25. Former House of Fraser, 16, Paved Court, 20, King Street, 4 to 8 and 10, Paved Court and 75-81, George Street, Richmond	<p>The draft text needs to be amended to include specific reference to the need for any development of the site to provide for the enhancement of the external elevations of the existing 1960s building and the complete removal of the existing plant-enclosures at roof level in order to enhance views of the building from The Green and Hill Street, particularly in relation to the setting of the grade II* listed properties in Old Palace Terrace on Richmond Green, and that any extension or extensions to the existing building should rise no higher than the existing building (i.e. above four storeys), or that any replacement development of the site should rise no higher than that of the existing building .</p> <p>Supporting document/evidence: Urban Design Study December 2021. Character Area F1 Central Richmond and Richmond Green Conservation Area Statements</p>	<p>The former House of Fraser building itself is not a heritage asset, though the Site Allocation makes clear that any development proposal must be of the highest quality in character, respond positively to the Conservation Areas and protect and where possible enhance on-site Listed Buildings and BTMs, as well as nearby heritage assets. Thus any future planning application would to have regard to heights, elevational design and roof treatments as part of the demonstration of compliance with the above. To list these specific requirements is considered to be too prescriptive for the purposes of a Site Allocation, whose existing wording would already allow for assessment of these matters. Thus no changes to the wording are recommended.</p>
598	Fiona Holland		I would like to see House of Fraser back again.	House of Fraser has vacated the building and it is not within the Council's gift to impose/secure a specific end user for the site, other than in land use terms, for which the Site Allocation already makes clear that a retail offer is expected on site. Thus, if House of Fraser were mindful to return in the future, the Site Allocation would not prevent this. No changes to the wording are therefore considered necessary.
-		Site Allocation 26: Richmond Telephone Exchange, Spring Terrace, Richmond		
599	Louise Fluker, The Richmond Society	Site Allocation 26 pp 107-108: Richmond Telephone Exchange, Spring Terrace, Richmond	We support a low rise redevelopment of what is an eye sore.	General support for the redevelopment of the site noted. Whilst the Site Allocation does not specifically state only a low-rise development would be acceptable, it does state that conversion of the existing building should be the starting point for any future development, and that if the site is to be redeveloped, any height should take into account the residential properties which adjoin the site. The wording of the Site Allocation is therefore considered to be appropriate and no amendments are recommended.
600	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	Site Allocation 26 - Richmond Telephone Exchange, Spring Terrace, Richmond	<p>The draft text needs to be amended to include specific reference to the need for any extension or extensions to the existing building should rise no higher than the three-storey part of the existing building, or that any replacement development of the site should rise no higher than that of the three-storey part of the existing building.</p> <p>Supporting document/evidence: Urban Design Study December 2021. Character Area F1 Sheen Road Conservation Area Statement</p>	See response to comment 599 with regards to heights.
601	John Buckingham	Richmond Telephone Exchange	Whilst the Richmond Telephone Exchange would benefit from demolition, the obvious replacement would be a single dwelling house to reinstate the single dwelling house at 7 Spring Terrace that was lost in the past. This would be the only way a	The existing building on site is considered to possibly be suitable for conversion, which is outlined in the Site Allocation as the preferred starting point for any development on site, before demolition and redevelopment would be considered.

			development could accord with Policy 28 A and B 9 which states “Ensure the design, layout and materials respect and respond to the historic environment and any relevant heritage assets”.	The building is considered to be of an acceptable quality and design which does not negatively impact on the Conservation Areas, and thus there are no policy reasons from a design perspective why the building would benefit from demolition, other than to enable to comprehensive redevelopment of the site, the reasons which would need to be demonstrated by any future application. Retention of the building is also compliant with Policy 2. Spatial Strategy: Managing Change in the Borough Part B which encourages the reuse and conversion of existing buildings to minimise embodied carbon, with a presumption in favour of refurbishment. Given the size of size of the site and that there is part 3 part 4-storey building already on site, which is not considered to negatively impact on the Conservation Area, it would not be appropriate to limit any future development to a single dwelling house, which would not be in compliance with Policy 44. Design Process Part A which requires the making of the most efficient use of land by optimising site capacity via a design-led approach, in accordance with London Plan Policy D3. The Site Allocation also makes clear that any development proposal must be of the highest quality in character and protect where possible enhance the Conservation Areas, as well as nearby heritage assets, having regard to the design objectives and general guidance relating to the local character of the area. It is therefore considered that the current wording would ensure that Policy 28 is complied with. No amendments are therefore considered to be necessary. See also response to comment 599 with regards to heights.
-		Site Allocation 27: American University, Queens Road, Richmond		
602	Louise Fluker, The Richmond Society	Site Allocation 27 pp109 : American University, Queens Road, Richmond	We would support repurposing the site as an educational one or mixed education/ residential or residential	Support for an educational use on site is noted. Residential uses are not cited in the Site Allocation as a preferred use, as the Council’s preferred uses would firstly be educational, and then social/community use, given the existing education/social/community use on site. That residential uses are not cited does not preclude a residential scheme from being submitted. Any application would be assessed against Policy 49. Social and Community Infrastructure. It is not considered that any amendments to the wording of the Site Allocation are required.
603	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	Site Allocation 27. The American University, Queen's Road, Richmond	The draft text needs to be amended to include specific reference to the need for any extension or extensions to the existing buildings on the site should rise no higher than any of the existing buildings on the site, or that any replacement or additional buildings on the site should rise no higher than any of the existing buildings on the site. Supporting document/evidence: Urban Design Study December 2021. Character Area F2 Richmond Hill Conservation Area Statement	The Site Allocation makes clear that any development proposal must protect and where possible enhance the heritage assets on site and the Conservation, as well as nearby heritage assets, having regard to the design objectives and general guidance relating to the local character of the area set out in the relevant character area profiles and design guidance set out in the Urban Design Study and Village Planning Guidance. It is not considered reasonable to be prescriptive regarding heights for its own sake; rather it is the Council’s intention to ensure that heritage assets are protected and where possible enhanced, and that development reflects the character of the area. Heights would therefore be considered as part of that assessment and it is not considered necessary to specifically refence a restriction in the Site Allocation. The wording of the Site Allocation is therefore considered to be appropriate and no amendments are recommended.
-		Site Allocation 28: Homebase, Manor Road, East Sheen		
604	Richard Carr, Transport for London (TfL)	Site Allocation 28: Homebase, Manor Road, East Sheen	We welcome the requirement for the retention of the existing bus terminus. It would be helpful to clarify that this comprises both bus standing and drivers’ facilities, and that they should be retained and enhanced in any redevelopment in consultation with TfL. The site is adjacent to the Transport for London Road Network (TLRN). Early engagement should take place with TfL to assess potential impacts on the TLRN.	Support for reference to the bus stands is noted. The Site Allocation has been amended to reference the need for consultation with TfL and the provision of standing capacity and drivers’ facilities. The new formatting of the Site Allocations includes site constraints and designations, including matters of access and nearby road networks. An additional bullet point has been added to require a developer to engage with TfL to ensure that there are no unacceptable impacts on the road network (as well as encouraging active travel). No further changes are considered necessary.
605	Marie Lewis	Site Allocation 28: Homebase, Manor Road, East Sheen	I'd like to warmly request a conversation with regards to a specific query on the designation of mid-rise and tall-buildings zones on the 'Homebase site', North Sheen (Site Allocation 28. p. 111 of the proposed/draft Local Plan). I recognise that there is a particular history with regards to plans for this site, and that the draft Local Plan draws upon recommendations from the Urban Design Study 2021, commissioned as part of this review. However, in this instance, it seems that the Urban Design Study has negated to account for the residents and locally designated character cottages on the NW border of the site (these homes directly border the site with only the short width of the London	It is agreed that that the tall and mid-rise building zones should be refined to be set back from the building line. The Urban Design Study has been amended in an updated version, and relevant mapping in the Plan including the thumbnail in Appendix 3 have been updated; however this does not impact on the Site Allocation and no amendments are recommended in this regard.

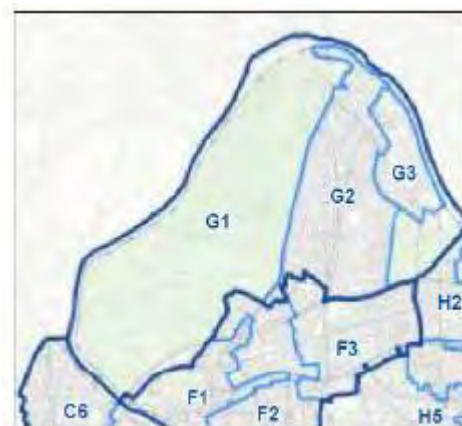
			<p>Underground track separating us from the site border), and so the study does not follow the same recommendations of centrally-southerly siting of taller buildings with adequate buffer zones, as it has for other, similar/equivalent sites.</p> <p>Anything above 6 storeys positioned on the border in this way, will swamp these locally designated buildings of character and local merit, and further, have a significantly deleterious impact on daylight of existing residents (leaving some homes below BRE acceptable standards), directly contravening Policies 28, 44, 45 and 46 of the proposed Plan.</p> <p>In short: the tall and mid-rise building zone for the Homebase isn't positioned central-southerly where it would have the least impact on existing residents for all sides... Rather, the proposed Plan places the taller buildings at the NW edge of the site, with no true buffer zone, and so forgets that there are houses directly the other side of the railway, and further, neglects to take in to account the southerly position of the sun in the Northern hemisphere where shadowing is always worse and most detrimental to those northerly of taller developments. - As such, it will cast long shadows over the NW residents for most of the day in winter, all the way across St George's, Bardolph, Victoria Villas, Trinity etc & beyond Raleigh Road.</p> <p>When you look more closely at the 'heat map' in the Urban Design Study (p.255, and attached for reference) no true or sufficient buffer has been given to residents on the NW of the site, especially those directly next to the railway/site border on Bardolph Road and the southerly side of St. George's Road. These residents, along with those on Trinity Road and Trinity Cottages, are those who stand to be most detrimentally affected by taller buildings on the site blocking their light and overshadowing, especially in winter months. Residents on Bardolph Road and the end of Trinity Rd and Trinity Cottages will have their homes left below acceptable BRE standards for light.</p> <p>The report mentions the locally designated buildings of character on the South/Easterly side of the development on Manor Grove and the surrounds, and does provide some lower-rise buffer for these homes, but it completely neglects to recognise the equivalently designated Buildings of Townscape Merit (small Victorian character cottages) on St. George's Road, Trinity Road, and Trinity Cottages.</p> <p>In summary, anything above 6 storeys will swamp these locally designated buildings of character and local merit, and further have a significantly deleterious impact on daylight of existing residents, directly contravening Policies 28, 44, 45 and 46 of the proposed Plan.</p> <p>I have attached a more in depth summary and also some useful diagrams from the Daylight & Sunlight Report from the Avanton submission [See Appendix 5], to help give some context and gravity of the scale of overshadowing for residents on the NW of the site for buildings above 6 storeys -- effectively we will be in shade of this overbearing development for over half the day in winter months, and some homes will be left well below BRE acceptable standards.</p> <p>I struggled to register my query on the consultation site, so would very much appreciate a formal response to let me know that my observation has been received, and how it will be possible to follow up with me on these material concerns regarding the Plan and designation for the Homebase site.</p> <p>I am unfamiliar with the consultation process for the Local Plan, and would welcome a conversation in the first instance, as I would support sensitive redevelopment of the site and I'm sure a reasonable solution of mid and lower rise could work and provide much needed housing. If however, there are not likely to be further iterations and amendments to the plan for a round of full public consultation**, please let me know if I need to more formally register these concerns as a direct objection.</p> <p><i>**Myself and other residents were not formally notified of this current consultation by letter nor email, so myself and other residents would welcome a fully accessible and truly public invitation to understand and comment/input.</i></p>	<p>The reformatting of the Site Allocations includes a 'Heritage Assets' section, where all nearby BTMs are listed, including those to the north/north west of the site. The Site Allocation makes clear that due to the constraints of the railway lines, BTMs and Conservation Areas, the height of the built form should step down towards the boundary. It is therefore considered that BTMs are sufficiently accounted for and no further amendments are recommended.</p> <p>Comments relating to the consultation process are not relevant to the wording of the Site Allocation and thus amendments are not required on this basis. A response was sent to Marie Lewis in February 2022 setting out that as the Local Plan covers the whole borough, it is not possible to resource individual notifications, so formal letters or emails to all residents are not sent. In line with the Government regulations and the Statement of Community Involvement, at this stage our consultation publicity included a public notice in the Richmond & Twickenham Times, and Council press releases on 16 December 2021 'Have your say on the new Local Plan to help shape the borough's development' and on 5 January 2022 'Attend Local Plan virtual events to have your say on the development of the borough' (each with associated social media activity). The open consultation, press release and events held featured regularly in the Council's weekly Community News bulletin emails during December and January (anyone can subscribe https://public.govdelivery.com/accounts/UKLBR/subscriber/new). Letters/emails are sent to our Local Plan database, which consists of statutory consultees and anyone who has requested to be kept informed of our plan-making progress.</p>
606	Louise Fluker, The Richmond Society	Site Allocation 28 pp 111-112: Homebase, Manor Road, East Sheen:	we support redevelopment but with a limit of 8 storeys as the maximum height	The site is within the Lower Richmond Road, North Sheen tall building zone which has an appropriate height of 7-8 storeys. No amendments are therefore considered to be necessary.
607	David Wilson, Thames Water	Homebase Ltd. 84 Manor Road, Richmond, TW9 1YB	<p>Thames Water Site ID: 53531 (PENDING - Reviewed 30/12/21)</p> <p>Water Response On the information available to date we do not envisage infrastructure concerns regarding water supply network infrastructure in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ</p> <p>Waste Response On the information available to date we do not envisage infrastructure concerns regarding wastewater network or wastewater treatment infrastructure capability in relation to this site/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ</p> <p>Additional Comments With regard to SURFACE WATER drainage, Thames Water would advise that as the site currently drains via infiltration, we are unable to fully assess the site for a sewer connection prior to completion of infiltration tests. Once infiltration tests are complete Thames Water will be able to assess the capacity requirements of this site, but would expect the site to remain draining via infiltration where possible.</p>	The Site Allocations format has been amended to include a description of the site/wider area and relevant constraints, to include identification of the flooding constraints for each site. Flood risk / SuDS matters are covered in Policy 8 'Flood Risk and Sustainable Drainage' of this Plan, with which any future planning application would need to comply. The inclusion of informatives would be relevant to any future decision notice and it would not be appropriate to include this in the Site Allocation. Thames Water would be a statutory consultee for any future planning application and would have the opportunity at that stage to recommend informatives. It is therefore not considered necessary to set out the requirements of developers for this in the Site Allocations.
608	Martin Ellis, South West London Clinical Commissioning Group (CCG)	Richmond and Richmond Hill, Site Allocation 28: Homebase, Manor Road, East Sheen; Site Allocation 29: Sainsbury's, Lower Richmond Road, Richmond	The area includes six site allocations including sites Richmond town centre and out of town retail sites at Homebase (No 28) and Sainsbury's (No 29).	The impact of new development on existing infrastructure can be assessed as set out in Local Plan Policy 49 'Social and Community Infrastructure' Part F and therefore it is not considered necessary to refer to this in the Site Allocation. The


			We note that the site allocation for Homebase, East Sheen reflects the current planning permission granted by Mayor London at a representation hearing in October 2020. We note that applicant has submitted further revisions to the application, but the CCG has reiterated the need for a developer contribution to provide additional primary care capacity in the local area. The introduction of residential use on the neighbouring Sainsbury's, Lower Richmond Road site will add to the pressure on local healthcare infrastructure. The Context text refers to a 'substantial provision of new housing units'. The CCG would welcome the opportunity to work with the Council to identify future healthcare requirements, which could include new healthcare provision on the site.	updated Infrastructure Delivery Plan 2023 also identifies future infrastructure and service needs for the borough.
609	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	Site Allocation 28 - Homebase, Manor Road, North Sheen	(N.b. Not East Sheen) Given the fundamentally flawed analysis and recommendations contained in the relevant parts of Arup's Urban Design Study to which repeated references are made in the draft Local Plan, the draft text of this Site Allocation needs to be amended by the deletion of the statement: 'The Urban Design Study 2021 identifies part of the site as a tall building zone (7-8 storeys), with a mid-rise zone buffer (5-6 storeys), in accordance with Policy 45 Tall and Mid-Rise Building Zones', and the statement '...however the Urban Design Study 2021 recommends the appropriate heights for the zone are up to 8 storeys to respect the small scale of the surrounding area'. The draft text needs to be further amended to include specific reference to the need for any new development across the site to rise no higher than four storeys in order to relate the predominantly two-storey scale of the nearby residential areas to the north, north-west, west, south-west, south and east of the site, and to the similarly scaled properties within the nearby Sheendale Road and Sheen Road Conservation Areas'. Supporting document/evidence: Urban Design Study December 2021. Character Area F3	See response to comment 594 regarding the methodology underpinning the Urban Design Study. Part of the site is identified within the UDS as having capacity for buildings of 7-8 storeys, illustrated on the heat maps on p.256 and p.328. The heat maps show the tallest buildings located in the centre of the site and reducing in height, reflected in the mid-rise zone which provides a transition to the smaller scale of the surrounding area. Additional wording to make specific reference within Appendix A to 2-storey prevailing heights to the N, NW, W, SW and SE and more specific separate references to the Homebase site versus the Sainsburys site has been amended in the updated Urban Design Study. However, no changes to the Site Allocation itself are recommended.
610	Myrna Jelman	Site Allocation 28: Homebase, Manor Road, East Sheen	I support your decision to have up to 7 storeys for the Homebase redevelopment and have objected every single time to the current and past proposals, notably to the latest ridiculous 11 storeys development. Even the supposedly midnight 8 storey side towers are already one story above the maximum this zone can take.	The site is assessed as having capacity for buildings up to 7-8 storeys in part of the site, stepping down around the edges of the site to a mid-rise zone with maximum 5-6 storeys. No amendments to the Site Allocation are therefore considered necessary in this regard.
-		Site Allocation 29: Sainsbury's, Lower Richmond Road, Richmond		
611	Richard Carr, Transport for London (TfL)	Site Allocation 29: Sainsbury's, Lower Richmond Road, Richmond	The site is adjacent to the Transport for London Road Network (TLRN). Early engagement should take place with TfL to assess potential impacts on the TLRN.	The new formatting of the Site Allocations includes site constraints and designations, including matters of access and nearby road networks. An additional bullet point has been added to require a developer to engage with TfL to ensure that there are no unacceptable impacts on the road network (as well as encouraging active travel). No further changes are considered necessary.
612	Louise Fluker, The Richmond Society	Site Allocation 29 pp 113-114: Sainsbury's, Lower Richmond Road, Richmond	The loss of the supermarket would be a major reduction in amenities in this part of Richmond but we can see the sense in redeveloping the area to make better use of the space and to combine mixed retail/residential provided that the height of the redevelopment is in keeping with its surrounding and in any event not higher than 6 storeys or 8 at most. As with the Homebase site public transport and access would need to significantly improve.	General support for the Site Allocation approach is noted. The Site Allocation makes clear that the continued use of the site as a foodstore is required. See response to comment 610 with regards to building heights. The Site Allocation has been amended to require the developer to engage with TfL on transport matters, and to encourage active travel. No further amendments are recommended.
613	David Wilson, Thames Water	SA 21 Sainsbury's, Lower Richmond Road, Richmond	Thames Water Site ID: 54334 (Reviewed Jan18) Water Response The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development . Waste Response On the information available to date we do not envisage infrastructure concerns regarding wastewater network or wastewater treatment infrastructure capability in relation to this site/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ Additional Comments With regards to Surface Water, we would expect the development to follow the drainage hierarchy as outlined in Sl.13 of the London Plan and would require further information before we could comment on discharge to our surface water sewers. The proposed development is located within 15 metres of a strategic sewer. Thames Water requests the following condition to be added to any planning permission. "No piling shall take place until a PILING METHOD STATEMENT has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement." Reason: The proposed works will be in close proximity to underground sewerage utility infrastructure. Piling has the potential to significantly impact / cause failure of local underground	The Site Allocations format has been amended to include a description of the site/wider area and relevant constraints, to include identification of the flooding constraints for each site. Flood risk / SuDS matters are covered in Policy 8 'Flood Risk and Sustainable Drainage' of this Plan, with which any future planning application would need to comply. The inclusion of informatives would be relevant to any future decision notice and it would not be appropriate to include this in the Site Allocation. Thames Water would be a statutory consultee for any future planning application and would have the opportunity at that stage to recommend informatives. It is therefore not considered necessary to set out the requirements of developers for this in the Site Allocations.

			sewerage utility infrastructure. Please read our guide 'working near our assets' to ensure your workings will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures	
614	Jon Rowles	Site Allocation 29: Sainsbury's, Lower Richmond Road, Richmond	- the lack of mention of car parking is conspicuous by its absence. How much car parking does the council believe a replacement supermarket and housing above will require? If the car parking provision is too restrictive the owners are unlikely to bring the site forward for development.	The site has a PTAL of 5 which is 'very good' and so a car-free residential development may be appropriate in line with Local Plan Policy 48. Vehicular Parking Standards and London Plan Policy T6. Generally, there is an overarching aim within the Local Plan to reduce car dependency and so a car-free development may be supported in this site, noting the high PTAL. However, this would be assessed on a case by case basis, and would depend on the land use and end-user. It is therefore not recommended that proscriptive parking provision targets are included in the Site Allocation. However, an amendment has been made to reference the need for car parking provision for the retail land uses in line with London Plan standards. Please also see response to comment 611 regarding engagement with TfL. No further amendments are recommended.
615	Anna Stott, WSP on behalf of Sainsbury's	Site Allocation 29 - Sainsbury's Superstore, Lower Richmond Road, Richmond	<p>[See comment 299 in relation to general comments and Site Allocation 5]</p> <p>Draft Allocation 29 – Sainsbury's Superstore, Lower Richmond Road, Richmond</p> <p>The draft allocation identifies the Sainsbury's site for comprehensive redevelopment to provide retail and residential uses. The continued use of the site as a foodstore and the reprovision of the existing retail floorspace is required as part of the allocation. SSL support this commitment to re-provide an equivalent amount of retail floorspace as part of any redevelopment scheme. However, whilst it is important for the retail floorspace to be re-provided, the allocation should be amended to also refer to the re-provision of adequate car parking on site as part of the redevelopment.</p> <p>The Sainsbury's store trades very well. with over 85% of transactions still taking place in store. Many shoppers visit the store either on foot or by bicycle. However, visits by car remain enormously important, with the majority of expenditure being on large, weekly shops. Invariably, these will be undertaken by car. It is probable that this pattern will continue going forwards. The store currently provides adequate parking for customers and this is particularly beneficial to those with larger families, the less mobile and vulnerable people for whom public transport, cycling or walking is not an option.</p> <p>Table 10.5 of the recently adopted London Plan (2021) states that in outer London the maximum car parking provision for retail uses should be 1 space per 50sqm (GIA). Sainsbury's are of the firm opinion that any redevelopment envisaged by the emerging Local Plan should incorporate the reprovision of car parking to the London Plan levels to support the viability of any proposed scheme.</p> <p>The site also needs to include enough servicing and operational land to enable future businesses to operate efficiently and without impediment. If the servicing is inadequate, then this will damage the attractiveness of the site for future occupiers and investors.</p> <p>In summary, it is vitally important that the draft allocation is updated to include a requirement to provide adequate car parking provision and servicing areas.</p> <p>Summary</p> <p>In summary, the proposed allocation of the two Sainsbury's sites (Draft allocations 5 and 29) is unacceptable as drafted. The current wording makes the Plan unsound.</p> <p>Any future version of the emerging Local Plan should include the following:</p> <ul style="list-style-type: none"> ▪ Allocation 29 – include specific reference to the reprovision of adequate car parking, servicing and operational space on site in accordance with London Plan requirements. ▪ Allocation 5 – remove the site from MOL because it is a foodstore car park and PFS, but also remove the reference to 100% affordable housing provision. The affordable housing levels set out in draft policy 11 should apply to the site; and ▪ Allocation 5 – remove the reference to 20% BNG. The requirement for BNG should reflect Policy 39, which itself should be amended to require 10% BNG, in accordance with The Environment Act 2021. <p>We hope that these representations will be taken into consideration and that the Council takes this opportunity to engage constructively with Sainsbury's, as a major investor and employer in the Borough. Unless these suggested amendments are made, the Plan will be unsound.</p>	Support for the general approach and reprovision of a foodstore is noted. Please see response to comment 614 regarding car parking.
616	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	Site Allocation 29 - Sainsbury's, Lower Richmond Road and Manor Road, North Sheen	<p>Site Allocation 29 - Sainsbury's, Lower Richmond Road <u>and Manor Road</u>, North Sheen</p> <p>Given the fundamentally flawed analysis and recommendations contained in the relevant parts of Arup's Urban Design Study to which repeated references are made in the draft Local Plan, the draft text needs to be amended by the deletion of the sentence: 'The Urban Design Study 2021 identifies part of the site as a tall building zone (7-8 storeys), with a mid-rise zone buffer (5-6 storeys), in accordance with Policy 45 Tall and Mid-Rise Building Zones'.</p> <p>Supporting document/evidence: Urban Design Study December 2021. Charcater Area F3</p>	See response to comment 594 regarding the methodology underpinning the Urban Design Study. The site is assessed as having capacity for buildings up to 7-8 storeys in part of the site, stepping down around the edges of the site to a mid-rise zone with maximum 5-6 storeys. No amendments to the Site Allocation are required.
-	Martin Ellis, South West London Clinical Commissioning Group (CCG)	Richmond and Richmond Hill, Site Allocation 28: Homebase, Manor Road, East Sheen; Site Allocation 29: Sainsbury's, Lower Richmond Road, Richmond	[See comment 608 in relation to Site Allocation 29]	See response to comment 608.
-		Place-based Strategy for Kew		

617	Melanie Gurney, The Planning Lab, on behalf of the Royal Botanic Gardens	Place-based Strategy for Kew	<p>In relation to Section 12 (Place-based Strategy for Kew), under the "other initiatives" sub-heading, the policy recognises that there are active travel opportunities, including upgrades to the Kew Gardens Station footbridge. RBGK request details within the policy of what these upgrades entail. In particular, RBGK note that there are no accessible routes through Kew Gardens Station at present. RBGK would support specific policy wording that would encourage such initiatives.</p> <p>The policy also confirms that future development in this area is expected to "improve wayfinding at the Station and across the town centre to places of interest such as ... the Royal Botanical Gardens." A key objective for RBGK is to ensure that visitors are able to easily navigate from the main stations and ferry terminal to the Gardens. Therefore, RBGK are in full support of this policy to improve wayfinding.</p>	<p>The place-making strategy identifies high-level policy initiatives and is not intended to set out detailed particulars of each aspiration. Improvements to Kew Gardens Station footbridge will require the input of National Rail and South Western Railway and would not be appropriate to list specific details here. An amendment has been made to the text to reference improved accessibility. No other changes are proposed. In addition, the updated Infrastructure Delivery Plan 2023 sets out details around transport infrastructure, largely reflecting the Local Implementation Plan which details the programme of measures and schemes and is regularly updated.</p> <p>Support for reference to wayfinding is noted.</p>
618	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	Place-based Strategy for Kew	<p>Based on Section 3 – Character Areas in Arup’s 432-page Urban Design Study, The Old Deer Park is incorrectly grouped with the Royal Botanic Gardens, Kew in Character Area ‘G1 – Kew Gardens and Riverside’ under the overall heading ‘G –Kew’). Like Richmond Park, the Old Deer Park should be covered by its own Character Area as ‘F4 – The Old Deer Park’, under the overall heading of ‘F – Richmond & Richmond Hill (sic)’. On this basis, other sections of Arup’s Urban Design Study and to the Draft Local Plan need to be adjusted accordingly.</p> <p>Indeed, more fundamentally, the proposed structure of ‘Character Areas’ relating to Richmond, Kew and North Sheen as set out in Section 3 et seq. in Arup’s Urban Design Study needs to be challenged. The proposed boundaries relate neither to the present Ward boundaries nor to the existing conservation area boundaries. They should surely be based for the most part on the present conservation areas.</p>	<p>The Old Deer Park is grouped into the character area G1 ‘Kew Gardens and Riverside’ because it is similar in character to the open spaces along this stretch of the Thames with regards to its green space, openness and its location next to the river. It is also part of the Kew Registered Park and Garden.</p> <p>The character areas and boundaries for the Urban Design Study (UDS) 2021 were subject to public consultation in May to June 2021. The method for defining the boundaries is set out in the methodology of the UDS pp.351- 353. This explains that, alongside field work, the following sources of information was used to define the boundaries included:</p> <ul style="list-style-type: none"> -the Village Planning Guidance SPDs -Ward boundaries -existing town centres and areas of regeneration -conservation areas. <p>Wherever possible, the UDS has followed conservation area boundaries and in particular, aimed not to split conservation areas. In some cases, conservation areas have been grouped because they are at too fine a grain for the scope of the study. The existing boundaries of the Village Planning Guidance were also used wherever possible, though areas were combined to achieve a more usable scale for the scope and purposes of this borough-wide study.</p> <p>The Old Deer Park is written about separately in the character area profile on p.170 and it is not considered that it warrants a separate character area profile. With regards to the other boundaries within the Richmond, North Sheen and Kew place, a detailed description of how these have been defined is provided below.</p> <p>Richmond Town Centre and Riverside: The boundary aims to incorporate the town centre character and uses and the Richmond part of the Riverside. Southern edge follows Village Planning SPD Area 13 along the river to Twickenham Bridge where it then follows the bridge as a logical feature and perceptual 'end' of Richmond town, before following the Village Planning SPD Area 13 and 14 and Conservation Area boundary with Old Deer Park. To the north west it follows Village Planning SPD Area 15 and Central Richmond Conservation Area but follows the edge of Richmond Road and Kew Road, then continues north up Kew Road to take in the mixed uses and shop frontage (broadly following the Area of Mixed Use boundary but excluding the residential uses) to reflect the area's evolving character which is more part of the town centre character. It then follows the Village Planning SPD Area 15 and Conservation Area boundary up to Larkfield Rd/St John's Rd where it deviates to follow the town centre boundary. To the east it then extends out to incorporate the Sheen Road Local and Neighbourhood Centre which reflects the extending town centre uses in this area. The southern boundary of this arm follows the Conservation Area boundaries of Sheen Road Richmond/St Matthias Richmond and Richmond Hill and Village Planning Area 16. Extending out to the south east, it then follows the town centre boundary up to where this joins Richmond Hill. It then follows Richmond Hill Road to exclude the residential uses to the north of the road. The remainder of the boundary follows the Village Planning SPD Area 12 and 13.</p> <p>Richmond and Richmond Hill Residential: The area aims to incorporate the residential areas around Richmond within Richmond Hill and to the north of Richmond town. To the south east the boundary follows the Village Planning SPD Areas 12, 9 and 10. It then follows the Conservation Area boundaries of St Matthias Richmond, Sheen Road Richmond and Sheendale Road Richmond. To the north it then follows the Village Planning SPD Areas 2/3, before following the</p>

				<p>Conservation Area boundary of Kew Road and Old Deer Park, before wrapping round the town centre.</p> <p>North Sheen Residential: This area aims to incorporate the residential areas of North Sheen. To the south it follows the Village Planning SPD Areas 8, 7, 6 and 3. To the west it follows the Sheendale Road Richmond Conservation Area.</p> <p>Kew Gardens and Riverside: Includes the green open spaces along the riverside, including the Old Deer Park and Kew Gardens.</p> <p>Kew Residential: The area aims to incorporate the residential area of Kew and follows Village Planning boundaries (excluding the riverside of Area 2 to the west).</p> <p>East Kew mixed use: Identifies the mixed/industrial uses of this zone as distinct. Follows Village Planning boundaries.</p> <p>It is therefore considered that the above boundaries and methodologies are logical and sound, and no alterations are proposed.</p>
619	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	Place-based Strategy for Kew (in relation to Old Deer Park)	We recommend that the Old Deer Park should be covered by its own Character Area but the park's access from Richmond Town and proximity encourage the consultation response from the Old Deer Park Working Group on the Old Deer Park to be considered alongside this response from the Prospect of Richmond on Richmond Town.	<p>See response to Comment 618 regarding the character area boundaries and Old Deer Park.</p> <p>Comments noted.</p>
620	Peter Willan and Paul Velluet, Old Deer Park Working Group	Place-based Strategy for Kew (in relation to Old Deer Park)	<p>Place Definitions. Based on Section 3 – Character Areas in Arup’s 432-page Urban Design Study, The Old Deer Park is incorrectly grouped with the Royal Botanic Gardens, Kew in Character Area ‘G1 – Kew Gardens and Riverside’ under the overall heading ‘G – Kew’. Like Richmond Park, the Old Deer Park should be covered by its own Character Area as ‘F4 – The Old Deer Park’, under the overall heading of ‘F – Richmond & Richmond Hill (sic)’. On this basis, other sections of Arup’s Urban Design Study and to the Draft Local Plan need to be adjusted accordingly.</p> <p>Indeed, more fundamentally, the proposed structure of ‘Character Areas’ as set out in Section 3 et seq. in Arup’s Urban Design Study needs to be challenged. The proposed boundaries relate neither to the present Ward boundaries nor to the existing conservation area boundaries. They should surely be based for the most part on the present conservation areas and in this case the Old Deer Park Conservation Area.</p> <p>Confusingly, the extant ‘Richmond & Richmond Hill Village Plan’ (2016) comprises all four areas plus Richmond and Richmond Hill residential (F2), North Sheen Residential (F3) and the Old Deer Park which is included in the Local Plan as Placed Based Strategy for Kew and has its own Old Deer Park Conservation Area Statement and SPD.</p> <p>We have extracted the Character Area Map from Arup’s Urban Design Study Dec 2021 and provided a Conservation Area Map so that members of the community reading our response can better understand the context.</p>	<p>See response to Comment 618 regarding the character area boundaries.</p>



			 <p>Conservation Areas Richmond & Richmond Hill Village Plan</p>	
621	Nick Alston, Avison Young on behalf of St George Plc and Marks & Spencer	Place Based Strategy for Kew	<p>We support the principle of having a place-based strategy for Kew. We have set out below as tracked changes the amends that we consider necessary to make the strategy sound. We then go on to explain/justify this.</p> <p>Recommended Amendments (tracked changes to Reg.18 draft text)</p> <p>There are opportunities in parts of East Kew for <u>new</u> development to positively contribute to improving the character and addressing negative qualities, creating a sense of activity with an inviting public realm as part of a coherent strategy to improve permeability and active travel links. At Kew Retail Park (Site Allocation 30) there is the opportunity for comprehensive residential-led redevelopment to include <u>an element of replacement retail, a range of and small scale complementary commercial</u> uses, improve the public realm, active travel and links to the River Thames (<u>where feasible</u>). <u>Development in and around Kew Retail Park should be of high architectural quality, informed by a detailed and thorough assessment of the surrounding townscape character, building on the findings of the Urban Design Study (2021) and supported by a comprehensive viewpoint study.</u> There is a tall building zone opportunity (<u>circa 7-8⁷</u> storeys), surrounded by a mid-rise buffer to provide for a transition to the more modest surrounding area, in accordance with Policy 45 Tall and Mid-Rise Building Zones. <u>Proposals for buildings of height at Kew Retail Park should be supported by sufficient justification, including a comprehensive Heritage, Townscape, and Visual Assessment.</u> Redevelopment at Kew Biothane (Site Allocation 31) is expected to deliver a residential use with associated open space provision.</p> <p>Explanation/Justification</p> <p>The amendments set out above are required in order to ensure consistency with Site Allocation 30, accounting for the recommended amendments set out in the following section.</p>	<p>General support for place-making strategy noted.</p> <p>It is not considered necessary to include the word 'new' before development as this would be superfluous.</p> <p>The place-making strategy is intended to identify high-level aspirations for the area, including on specific sites. Further details are provided in the Site Allocations themselves. In this instance, the Site Allocation for Kew Retail Park references that the Council would support a comprehensive residential-led development with a range of commercial uses, including retail (as well as offices, affordable workspaces, and leisure). The mention of commercial uses in the place-making strategy is therefore considered to already be consistent with the Site Allocation and no amendments are to the text are considered necessary.</p> <p>The Site Allocation makes clear that a future proposal should improve the public realm, increase active travel and be designed to improve the connectivity and permeability of the site, creating connections with the River Thames (and Kew Riverside development). This has been amended to state 'where feasible' for consistency with new Local Plan Policy 40. Rivers and River Corridors part D. Given that this is now mentioned in the Site Allocation, it is not considered to amend the place-making strategy text, which is intended to be a short high-level statement of the aspirations for the site.</p> <p>Similarly, the Site Allocation references the need for development to have regard to the design objectives and general guidance relating to the local character of the area set out in the relevant character area profiles and design guidance set out in the Urban Design Study and Village Planning Guidance. It is therefore not considered necessary to repeat this in this section of the place-making strategy. Further, the Site Allocation makes clear the need for The Royal Botanic Gardens World Heritage Site will to be taken into consideration when designing any future scheme. Policy 45. Tall and Mid Rise Building Zones part A.5 also states that development proposals should be supported with graphic 3D modelling to assess the impact on the skyline and views, in line with Policy 44. Design Process, and part A.6 states that development proposals affecting the setting and approaches of the World Heritage Site must address all criteria set out in Policy 29. Royal Botanic Gardens, Kew World Heritage Site. It is not considered necessary to explicitly state the requirement for a viewpoints study in the place-making strategy text, as this is accounted for already in other policies in the Local Plan, also noting the reference of the need to consider World Heritage Site in the Site Allocation text, which is considered to be sufficient. No amendments are required.</p> <p>The Urban Design Study 2021 (UDS) has identified there is capacity for the site to accommodate buildings up to 7 storeys 'within part of the tall building zone in the centre of the site' (p.257). The UDS has assessed the tall building zone with reference to a scenario, as set out in Appendix A (p.335-337). The assessment</p>

				concludes that 'the depth of the Kew Retail Park site offers potential for buildings up to 7 storeys within part of the tall building zone in the centre of the site. The existing character and size of the Kew Retail Park site provides opportunity for a development that could positively enhance the character of the area'. (p.337). As illustrated on p.336 of the UDS, the assessment in Appendix A includes a Zone of Theoretical Visibility (ZTV) of a 7 storey building in the centre of the site, and shows that visibility of this is unlikely to extend to Kew WHS. However, heights above this would found to likely be visible. It would therefore not be appropriate to amend the text to reference 8 storeys.
622	James Bartholomeusz	Place-based strategy for Kew: Policy (p.118)	I strongly support the aim to promote active travel and reduce the dominance of vehicle traffic. This is after one of our cats was injured in a road traffic accident in September 2021, requiring surgery and months of recovery.	Support for promotion of active travel and reduction in vehicular traffic noted.
-		Site Allocation 30: Kew Retail Park, Bessant Drive, Kew		
623	James Bartholomeusz	Site Allocation 30: Kew Retail Park (p.119)	The plan states that a "policy compliant" level of affordable housing should be delivered in the redevelopment of Kew Retail Park. This is absolutely necessary - "policy compliance" is the minimum level of affordable housing that we should be aiming for.	Support for affordable housing noted; any application would be assessed against Policy 11 to ensure an affordable housing contribution has been maximised.
624	Catherine Rostron	12 Place-based Strategy for Kew, Site Allocation: Kew Retail Park	<p>The reason that the Kew Retail Park works so well as a local shopping centre is because it's retail units are larger than normal local units. This makes it a valuable and unique resource.</p> <p>Removing some of this floor space to build homes would be a mistake. Given the number of homes in the area and the limits to accessing other areas because of the river barrier, this local centre is an essential feature.</p> <p>Talk of higher rise developments is also inappropriate to the area and the quality of the local landscape both from the Kew side and from the high quality urban landscape of Strand on the Green.</p> <p>For this reason any future developments need to be limited to the height of the existing Kew Riverside development.</p>	<p>The Richmond upon Thames Retail and Leisure Study Phase 2 (2023) forecasts that up to 2034, there is an over-supply of 2,900 sqm gross of retail floorspace, and an under-supply of food/beverage floorspace of approximately 5,400 sqm. Therefore, by 2034 there is a combined under-supply of approximately 2,500 sqm gross.</p> <p>It suggests a small increase in comparison goods floorspace capacity of c. 200sqm (gross) and a very small requirement of c. 100m2 of convenience retail floorspace for the Kew/ North Richmond zone by 2034.</p> <p>Further, planning policy at London Plan level (and the Local Plan) does not explicitly protect existing retail space other than via the protection of existing employment space. London Plan Policy SD7 'Town centres: development principles' takes a strong town centres first approach, supporting the redevelopment of existing out-of-centre retail parks for housing intensification, and stating that this should not result in a net increase in retail floorspace unless the proposal is in accordance with the Development Plan or can be justified through the sequential test and impact assessment requirements set out in Parts A(1) and A(2) of the policy. However, the Site Allocation does also recognise that Kew Retail Park is well used and a popular retail destination, despite its location outside of a town or local centre. The Site Allocation also makes clear that the Council expects commercial uses to be retained on site, and that the mix of such uses, including retail, should be curated so that they add to the vibrancy and vitality of the new community. It is therefore considered that the wording of the Site Allocation strikes the right balance between recognising the retail importance of the site together with the borough-wide need to provide new housing, which has been deemed to be appropriate for the site. No amendments are therefore considered necessary in this regard.</p> <p>See response to Comment 621 with regards the acceptability of a Tall and Mid Rise Building Zone on this site. It is not considered that any amendments to the wording are necessary.</p>
625	Richard Carr, Transport for London (TfL)	Site Allocation 30: Kew Retail Park, Bessant Drive, Kew	The site is adjacent to the Transport for London Road Network (TLRN). We therefore welcome the statement that ' <i>The applicant is strongly advised to seek pre-application transport and highway safety advice from Borough and TfL Officers before writing their transport assessment.</i> '	The reformatted Site Allocations includes a section on transport constraints, and the TLRN has been identified. Support for the advice to engage with TfL is noted. No further changes to the wording are required.
626	Katie Parsons, Historic England	Site Allocations 30: Kew Retail Park, Bessant Drive, Kew and 31: Kew Biothane Plant, Mellis Avenue, Kew	<p>These sites are next to each other and so any cumulative impacts upon the area need to be considered. Ideally this would be referred in the policies. Site 30 is identified as being suitable for tall and mid-rise buildings (max 7 storeys). Both sites are bounded to the north by more recent development or 4-5 storeys and so this is likely to be appropriate. Taller elements should be carefully located within the site and the policy could be amended to state this. Generally, however the criteria set out is helpful in managing how the historic environment is treated. We have modelled a height of 21m on Vu City to assess potential impacts upon the Kew WHS, and while theoretically visible, 21m would be below the ridgeline of surrounding development, and so is unlikely to be problematic with regards to Kew.</p> <p>An archaeological Desk Based Assessment will be required for these sites as there is potential for palaeoenvironmental and prehistoric archaeological remains, possibly deeply buried. GLAAS should be consulted at an early stage to advise on place making and public benefit.</p>	<p>The cumulative impact of development at the Kew Retail Park site and Biothane Plant site were taken into account as part of the Urban Design Study 2021 (UDS). It is therefore not considered necessary to cite this in each individual Site Allocation.</p> <p>The UDS references the potential for buildings up to 7 storeys within part of the tall building zone in the centre of the site. The area for the tallest elements are also indicated on the UDS diagram, in the centre of the site. Any future proposal for a tall building/s would need to comply with Policy 45. Tall and Mid Rise Building Zones, which requires appropriate siting and design of buildings in these zones. It is therefore not considered necessary to specifically cite careful location within the Site Allocation, as this is already covered in other policies in the Local Plan. The Site Allocation does cite the need for an area of transition within the tall building zone with the more modest surrounding buildings, and also the need to take into consideration the World Heritage Site. This is considered to be sufficient</p>

				and no further amendments are necessary. General support for the criteria is noted. The Kew Retail Park site is not located in Tiers 1 to 3 of the Archaeological Priority Zones (as reviewed in 2022), but falls within Tier 4 on present evidence; it is also not a green field site where potential may be identified. For any major application there would still need to be an assessment of the potential for archaeological potential and preapplication consultation of the Greater London Archaeological Advisory Service (GLAAS) would be encouraged. Where sites are located in Archaeological Priority Zones 1 to 3, the submission of an archaeological desk based assessment would be a mandatory validation requirement and GLAAS would be a statutory consultee as part of the planning application process. It is therefore not considered that any amendments to the text are required.
627	Martin Ellis, South West London Clinical Commissioning Group (CCG)	Site Allocation 30: Kew Retail Park, Bessant Drive, Kew	We note that a new site allocation has been added, at Kew Retail Park (Site Allocation 30) where there is the opportunity for comprehensive residential-led redevelopment to include a range of commercial uses. The site adjoins the Levett Square development (the former Inland Revenue site) where the Richmond Medical Group is operating from a new health facility. The CCG would welcome the opportunity to discuss the potential healthcare impact.	The impact of development on existing infrastructure can be assessed as set out in Policy 49. Social and Community Infrastructure' Part F and therefore it is not considered necessary to refer to this in the Site Allocation. The updated Infrastructure Delivery Plan 2023 also identifies future infrastructure and service needs for the borough.
628	Nick Alston, Avison Young on behalf of St George Plc and Marks & Spencer	Site Allocation 30 (Kew Retail Park)	<p>These representations have been prepared by Avison Young (with input from JTP, Montagu Evans, and Energist) jointly on behalf of St George Plc (SG) and Marks and Spencer (M&S), who are the owners of the Kew Retail Park site (referred to as the 'Landowners' from hereon).</p> <p>The Landowners welcome the general direction of the Regulation 18 draft Local Plan and strongly support the proposed allocation of the Kew Retail Park site for redevelopment. The principle of redeveloping the site is firmly aligned with the objectives of national and London Plan policy and it represents a fantastic opportunity to bring forward something truly special for the borough.</p> <p>We are keen to work collaboratively with the Council, the local community, and other stakeholders to prepare a planning application for the redevelopment of the site over the course of 2022 and to deliver that scheme as soon as possible. Key to this is ensuring that the new local plan includes an appropriately supportive site-specific policy to act as the basis for the determination of the future planning application, and to ensure that the content of the plan as a whole is sound. The purpose of our representation is to make recommendations on how the site-specific policy could be strengthened and to helpfully identify where we consider there to be soundness issues with the current draft, with regards to the plan being: positively prepared; justified; effective; and consistent with national policy (and in general conformity with the London Plan). In each instance we go on to explain the issue and propose amendments or other solutions to resolve it to ensure that the plan is progressed on a sound basis.</p> <p>We first set out our comments regarding the evidence base (the Urban Design Study (2021) and the Retail and Leisure Needs Study (Part 1) (2021). We then have comments on the Place Based Strategy for Kew, Site Allocation 30 (Kew Retail Park), and Policies 4, 6, 10, 11, 12, 13, 17, 18, 28, 29, 30, 31, 37, 38, and 45 (including Appendix 3).</p> <p>The Landowners welcome an ongoing engagement and dialogue with the Council on Local Plan as it moves forward.</p> <p>Site Allocation 30 (Kew Retail Park) Recommended Amendments (tracked changes to Reg.18 draft text)</p> <div style="border: 1px solid black; padding: 5px;"> <p>Site Proposal</p> <p>Comprehensive residential-led redevelopment of the site with the opportunity for an element of replacement retail and a range of small scale complementary commercial uses, including retail, offices (with the provision of affordable workspaces), and leisure. The redevelopment should look to improve the public realm, active transport through the site and links to the River Thames where feasible.</p> <p>Context:</p> <p>Kew Retail Park is a well-used shopping destination made up of seven large floorplate stores and extensive surface car parking.</p> <p>There is a need for housing in the borough and this site is considered to be suitable for a substantial provision of new housing units. The Council expects that a policy-compliant level of affordable housing is provided.</p> <p>Due to the site's proximity to the River Thames it is located within Flood Zone 3a (an area at high risk of flooding) and is in a Flood Alert and Warning Area as designated by the Environment Agency. Any redevelopment proposal needs to take this into account.</p> </div>	<p>General support for the draft Local Plan and inclusion of Kew Retail Park as a Site Allocation is noted.</p> <p>See response to Comments 621 and 624 regarding the mention of the proposed retail use of the site. It is recognised that the site is of mixed ownership. Any developer would be expected to approach and work in partnership with all landowners as part of a comprehensive redevelopment of the site. However, whilst a comprehensive redevelopment of the site as a whole is the Council's preference, the Site Allocation does not preclude the development of the site coming forward in part, subject to other requirements being met as identified in the Site Allocation above. Nor is it considered that the Site Allocation would prevent Marks and Spencer's aspiration of a replacement store on site, or the continuation of a service as part of a phased development. It is therefore not considered that amendments to the current text, in response to ownership matters, are necessary. It is further not considered necessary to repeat London Plan policy wording, with regards to the sequential test to justify an increase in retail space, in the Site Allocation, as this is already covered in the London Plan, and owing to reasons set out in the responses to Comments 621 and 624. That the full wording of policies in the London Plan are not repeated in the Site Allocations does not preclude any planning application from being assessed against the relevant policies accordingly.</p> <p>The purpose of the Site Allocations is to outline the acceptable land uses which the Council would support as part of any redevelopment that comes forward. It is therefore appropriate that the Site Allocation for Kew Retail Park references the expectation that development provides a policy-compliant level of affordable housing. No amendments to the text are considered necessary.</p> <p>See response to Comment to 624 with regards the Richmond upon Thames Retail and Leisure Study. This Study, including forecasts for each zone in the borough, is considered to be most relevant to the underpinning of the Site Allocation aspirations, over any identified borough-wide trends. It is therefore not considered that any amendments to the text are required in this regard.</p> <p>It is noted from the comment that the owner (Marks & Spencer) intends to retain and reprovide a store on site. The existing store currently has a food offer. It is further noted that there are other convenience stores serving communities in this area. It is thus not considered that the Site Allocation as currently worded is at odds with Policy 1. Living Locally and the 20-Minute Neighbourhood (Strategic Policy) and therefore rewording of the Site Allocation to allow for an increase in retail space is not considered to be justified on this basis. No amendments to the text are considered necessary.</p> <p>The reference to protecting the local centre of Kew is considered to be self-explanatory and is in conformity with Policy 18. Development in Centres. This</p>

		<p>The existing site is car-orientated, and any proposals should look to increase active travel through the site and towards Kew Station and the surrounding area.</p> <p>There is an expectation that any redevelopment provides new on-site Public Open Space <u>in accordance with Policy 37</u> in addition to any external amenity space requirements, delivering multi-functional benefits including for nature conservation and biodiversity value as well as for health and wellbeing of future occupants and users, including surrounding communities.</p> <p>There should be an improvement to the public realm through high quality landscaping, which can enhance and improve the biodiversity of the site. Tree-lined avenues are typical of the area.</p> <p>Currently the site has boundary treatments which cut it off from the surrounding area, creating almost an island effect. Proposals should be designed to improve the permeability of the site creating connections with the Kew Riverside and the River Thames <u>where feasible.</u></p> <p>Whilst the site is not located within a main or local centre, it has for many years proved to be a popular retail destination. It is expected that a substantial element of retail development/commercial uses will be retained/replaced on site. Opportunities to improve convenience goods retail provision (in order to be suitable to meet 'main food shop' needs) will be supported in order to contribute towards achieving the 20-minute Neighbourhood objectives of Policy 1. The overall mix of uses, which could include other minor/small scale complementary town centre uses, such as retail, cafes, and offices, should be curated so that they add to the vibrancy and vitality of the new community. The proposed office provision should provide affordable workspace for small and medium-sized companies.</p> <p><u>While the Sequential and Impact Test requirements of Policy 18 will need to be satisfied at the planning application stage, the requirements to satisfy both tests will be limited in scale and complexity bearing in mind the in-principle acceptability of providing substantial replacement retail floorspace on the site. Proposals that satisfy the Sequential Test and do not have a significant adverse impact on the Borough's town centres will be supported.</u></p> <p>Any new convenience retail provision should not exceed the floor space of the existing units, to protect the existing main centre in Kew.</p> <p><u>Development should be of high architectural quality, informed by a thorough assessment of the prevailing townscape character of the area (informed by the Urban Design Study (2021). The applicant will be required to demonstrate that the proposed development corresponds/relates with the surrounding character areas, including Kew Residential and nearby Kew Gardens, in line with Policy 28.</u></p> <p>The Royal Botanical Gardens World Heritage Site is within 500m which will need to be taken into consideration when designing the scheme.</p> <p>The applicant will be required to submit a full transport assessment completed in accordance with local and London-wide guidance. This will include a detailed assessment of its impact on the local and strategic road network. The applicant is strongly advised to seek pre-application transport and highway safety advice from Borough and TFL Officers before writing their transport assessment.</p> <p>The Urban Design Study 2021 identifies part of Kew Retail Park <u>as being able to accommodate tall and mid-rise buildings (at least 7-storeys) as a tall building zone (7-storeys) surrounded by a mid-rise buffer zones (5-6 storeys) to provide, providing for</u> an area of transition with the more modest surrounding buildings, in accordance with Policy 45 Tall and Mid-Rise Building Zones.</p> <p><u>The applicant will be required to submit a full Heritage, Townscape and Visual Impact Assessment, which will include a detailed assessment of the proposed development's potential impact on surrounding heritage and townscape receptors, in line with Policy 45.</u></p> <p>Design objectives and general guidance relating to local character of the area, which any redevelopment proposal should have regard to, is also set out in the Urban Design Study 2021, G3 East Kew Mixed Use and in the Kew Village Planning Guidance.</p> <p>Explanation/Justification</p> <p>1. The Principle of the Allocation The principle of allocating the site for comprehensive residential-led redevelopment is firmly encouraged by London Plan Policies SD7, E9, and H1, which require boroughs to realise the full potential of existing out-of-centre retail parks for housing intensification and other uses.</p> <p>2. Site Availability The effectiveness of the allocation is dependant on whether the land will be made available for development over the plan period, as this determines whether the allocation is deliverable. We set out the key considerations below:</p> <p><u>Planning Context</u></p>	<p>policy seeks to support the borough's designated centres in providing services, retailing, communities facilities etc, so that they remain attractive places to shop and visit. The reference is also in conformity with London Plan Policy SD7, as outlined already above. Kew is classified in the Local Plan as a Local Centre. The area around Kew Gardens Station and local parades along Sandycombe Road is identified in the Urban Design Study as a local centre which provides 'the focus of activity within the area' supporting 'numerous shops and cafes' and has been considered in the Council's further retail research assessing the hierarchy and boundaries. The aspiration set out in the Site Allocation to resist an increase in retail floorspace is therefore in compliance with this approach. The onus would be on the applicant to demonstrate that any net increase in convenience floorspace would not be harmful to the vitality and viability of existing centres, via the submission of a Retail Impact Assessment if appropriate, as set out in Local Plan Policy 18 and London Plan Policy SD7. The Site Allocation is not considered to prohibit this, as any application would be assessed against relevant policies in the Development Plan; more it is an aspiration for the site which, in any case, is supported by policy. It is therefore not considered that any amendments to the current text are required.</p> <p>With regards the point about the types of goods, the Site Allocation refers to 'a range of commercial uses'. It is therefore not considered that the text is restrictive and at odds with the London Plan in this sense. No amendments are considered to be necessary.</p> <p>The Site Allocation states that the Council 'will support a comprehensive residential-led redevelopment of the site with a range of commercial uses, including retail, offices (with the provision of affordable workspaces), and leisure.' (emphasis added). It later states that, with regards to the expectation that commercial uses are retained on site, the 'mix of uses, such as retail, cafes and offices, should be curated so that they add to the vibrancy and vitality of the new community'. (emphasis added) It is therefore not considered that the Site Allocation is worded in such a way which could be interpreted that a major office use would be acceptable on the site, given that it is clear that any development should be residential led, and that a range of other commercial uses are supported (as well as leisure). The site's location next to the Marlborough Trading Estate, is considered to further rationalise the acceptability of some employment use here. It is overall considered that the acceptability of some office use within a residential-led development which includes a range of other commercial uses, including leisure, is sound, and complies with Local Plan Policy 23. Offices which allows for non-major office development outside of town centres, and would also contribute to the Borough's identified need for an increase in office space in general, as set out in the Employment Land and Premises Needs Assessment. It is therefore not considered necessary that any amendments are made to the text, in this regard.</p> <p>With regards the point about making the flexibility of the types of commercial/other uses, the current wording refers to 'a range of' of uses and the use of 'such as' is considered to already allow for this flexibility. It is therefore not considered that amendments to the text are required.</p> <p>Given size of the site, as well as the expectation that new development delivers a substantial uplift in residential accommodation together with a range of other uses, it is not considered inappropriate that the Site Allocation makes reference to a need for new on-site Public Open Space as part of a place-making strategy. Further, the site is located close to the River Thames. Part B of Policy 37. Public Open Space, Play, Sport and Recreation encourages new open spaces to be linked to the wider green infrastructure network 'as they play an important role in creation social cohesion, encouraging and promoting healthier and more active lifestyles'. It is not clear from the comment how the inclusion of this aspiration in the Site Allocation is at odds with Policy 37, or how removing the aspiration and replacing it with a reference to Policy 37 instead, would resolve that. The Site Allocations are not intended to be a list of relevant policies in the Local Plan which would apply to any future planning application, and instead are intended to</p>
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Total floorspace (GIA) to not exceed 13,935sqm; - Opening hour restrictions; and - Units shall only be used for the sale of non-food items (except restaurant). <p>Conditions attached to the operating consent have subsequently been varied, including as follows:</p> <ul style="list-style-type: none"> - 95/2073. Use of up to 1.5% of the gross floor area (21sqm) of a unit (no details available) for the sale of baby foods. Personal consent for the benefit of Children’s World Ltd. Approved. - 97/2469. S.73 application to allow up to 1.5% of the gross floor area (16.89sqm) of unit D (Boots) to be used for the sale of baby and dietary foods. Approved. - 99/290. S.73 application to allow 743sqm of the M&S Unit to be used for the sale of food. Approved. Personal consent for the benefit of M&S only (controlled by s.106 agreement). - 02/3091. S.73 application to amend opening times of M&S unit. Approved. <p><u>Site Ownership and Conditions for Making the Site Available</u></p> <p>The entirety of the proposed allocation site is under the ownership of SG and M&S:</p> <ul style="list-style-type: none"> - M&S own the unit currently occupied by the M&S store; - SG own the other retail units; and - SG and M&S have joint ownership rights over the car park, servicing areas, and access. <p>Refer to land ownership plan at Appendix B.</p> <p>The overlapping ownership rights mean that the ability to bring forward the comprehensive redevelopment of the site is dependent on both landowners being willing to make their land available for development. Their willingness will be dependent on operational and viability based commercial considerations being satisfied, which are different for each landowner. This is in the context that the site is currently in an active, highly valuable use, that is expected to remain viable in the long term. We set out the conditions/requirements for each landowner below:</p> <p><u>St George</u></p> <p>St George acquired its part of the site in 2021. While it provides a viable long term income stream, SG’s objective is to work with M&S to bring forward the comprehensive redevelopment of the whole site to include a substantial amount of new housing at the earliest opportunity. Clearly this will be significantly influenced by the policies in the new Local Plan.</p> <p><u>M&S</u></p> <p>M&S operates two stores within the borough (KRP and Richmond Town Centre) plus food-only stores at Richmond Station (franchise) and Barnes. The KRP and Richmond Town Centre stores complement one another with KRP serving a more regional catchment and the town centre a more local catchment. Both stores trade well. M&S has no intention of closing either store. Both have been identified as priority stores for upgrade/investment as part of M&S’s ‘Renewal’ strategy.</p> <p>M&S is keen to invest in improving the KRP store as soon as possible. Its options are either to retain and refurbish the existing store or to provide a new replacement store as part of the comprehensive redevelopment of the site (which it would progress with SG). Its willingness to progress the redevelopment option will be dependent on feasibility, which will be subject to the following commercial tests being met:</p> <ul style="list-style-type: none"> - The replacement store must include replacement comparison goods floorspace plus a minimum 25,000sqft of convenience goods floorspace (net sales area) plus car parking; and - The KRP store must continue to trade throughout redevelopment which will require the new replacement store to be completed prior to the demolition of the existing store. <p><u>Timescales</u></p> <p>Each of the retail units under SG’s ownership are in active use. However the terms of leases allow flexibility in obtaining vacant possession of these units which will be obtained once a planning permission is in place. The existing M&S unit can be vacated following the completion of the replacement store, which in practice will be a key driver in development phasing. It is anticipated that the car park could be vacated and made available for development in phases.</p> <p><u>Soundness Issues with Current Draft</u></p> <p>As explained above, the principal site availability issue is that the willingness of the landowners to bring the site forward for comprehensive redevelopment is dependent on the ability of M&S to provide a replacement store of a minimum specification. In order for the allocation to be effective and positively prepared, it is critical that it includes express, positive support for substantial replacement retail development (including an increase in convenience retail floorspace) on the site alongside the substantial residential development that the current draft already supports.</p> <p>3. Land Uses (Residential)</p>	<p>provide detail of the acceptable land uses and other aspirations which the Council would likely support from any future development. It is therefore not considered that any amendments to the text are necessary in this regard.</p> <p>See also response to Comment 621 with regards to the amended text which now includes ‘where feasible’ in relation to improvement of connectivity to the River Thames. A design-led approach should explore how connectivity for pedestrians and cyclists and to the river can be achieved, including through a Healthy Streets Audit; issues such as land ownership can be overcome and it is appropriate for pre-application and application discussions to ensure this is fully addressed as far as possible.</p> <p>The Site Allocation does not state that tree-lined avenues should be replicated on site; rather, it notes that these are typical of the area. The wording requires ‘an improvement to the public realm through high-quality landscaping’. Any proposal would be expected to demonstrate how characteristics and design features of the surrounding area have been considered as part of the design, and it is therefore considered that the identification of tree-lined avenues in the Site Allocation as one of these such features is helpful to any future developer, with being too prescriptive as to how a landscaping scheme should be designed. No amendments to the next are considered to be necessary.</p> <p>See response to Comment 621 with regards to proposed building heights on the site.</p>
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As explained above, part of the site is owned by SG. SG is part of the Berkeley Group which builds homes and neighbourhoods across London, Birmingham and the South of England. Berkeley specialises in brownfield regeneration, reviving underused land to create unique, sustainable and nature-rich places where communities thrive and people of all ages and backgrounds can enjoy a great quality of life. The group as a whole is one of the largest residential developers in London, Berkeley built 3,254 homes in 2020/21 and a total of 18,481 over the last five years (including joint ventures). 2,825 homes were delivered in London, some 10% of London's new private and affordable homes

SG acquired its part of the site in 2021 with the intention of working with M&S to deliver comprehensive redevelopment, including substantial new housing. It has the demonstrable intent and capability to deliver the draft policy requirement of substantial residential development which we strongly support. We note that this is firmly aligned with London Plan Policies E9 C(6), SD6, SD7 and H1 which encourage the redevelopment of out-of-centre retail parks to deliver housing intensification alongside other uses.

We consider the content of the site allocation as relevant to residential development to be sound. However, we note that there is no need to repeat content that is adequately covered in other policies (such as affordable housing).

4. Land Uses (Retail)

The Principle of Substantial Retail Use

As explained above, the site currently accommodates 12,932sqm of retail floorspace. Accordingly, the acceptability of substantial retail floorspace on the site is already established in planning terms.

The principle of replacing this existing floorspace is supported by London Plan Policy SD7 (A3) (and Policies E9 C(6), SD6, and H1) which encourage the comprehensive redevelopment of out-of-centre sites such as KRP and confirm the acceptability of including replacement retail floorspace of up to the same existing overall quantum. The policies then confirm the acceptability of increasing the amount of retail where this can be justified by sequential and impact policy tests in accordance with the national planning policy approach to control such matters.

We recommend that this point is confirmed in the policy wording (or supporting text) in order to ensure that the policy is demonstrably **justified** and capable of being implemented in an **effective** manner.

The Area-Specific Need for Improved Access to Convenience Retail Provision

As explained above, the availability of the site for redevelopment is dependent on the provision of substantial replacement retail floorspace (a replacement M&S store). This includes a requirement to increase the amount of convenience goods retail floorspace to a minimum 25,000sqft (net sales area).

The Richmond upon Thames Retail and Leisure Needs Study Phase 1 Update (July 2021) identifies an over-supply of convenience goods retail floorspace in the period to 2029, however long-term growth suggests an under supply by 2039. This is a borough level quantitative assessment of capacity which does not take account of more localised quantitative or qualitative needs.

We consider there to be a need to increase the amount of convenience goods retail floorspace in/around Kew in order to deliver the strategic policies that underpin the draft local plan as a whole – notably the Living Locally/20-Minute Neighbourhood principles of Policy 1 which is at the heart of the local plan. Policy 1 states that the 'living locally' concept will be achieved by giving people the ability to meet most of their daily needs (including access to food shopping) within a 20-minute walk from home, with safe cycling and public transport options. As demonstrated in Map 4.1 of the Local Plan, most of the borough is within 800 metres (as the crow flies) of a centre or shopping parade including much of Kew. However, on closer investigation it is clear that existing (and future) residents in much of Kew (including the KRP site) do not live within 20 minutes' walk of a supermarket that is capable of meeting a 'main' food shop need.

Details of the closest supermarkets to the KRP site are set out in Table 5.1 below (refer to walk-distance maps at Appendix A):

Table 5.1 Existing Local Supermarkets

Store	Address	Suitable for a Main-Food Shop?	Distance from KRP Site	Walk-Time from KRP Site
M&S	Kew Retail Park	No Top-up Only	-	-
Tesco Express	2-8 Station Parade, Kew, TW9 3PZ	No Top-up only	0.5 miles 0.8 km	11 minutes
Sainsbury's	Lower Richmond Road, TW9 4LT	Yes	1.2 miles 2 km	23 minutes
Waitrose	Upper Richmond Road, East Sheen, SW14 7JG	Yes	1.3 miles 2.1 km	28 minutes

This existing access deficiency (on the basis of the requirements of Policy 1) translates to a qualitative need to improve convenience retail provision in Kew, in order that it is capable of providing for main food shop needs (as opposed to just top-up shopping). This need will intensify with the delivery of substantial new housing on the KRP site (as sought by the draft site allocation).

The provision of an improved convenience retail offer as part of the replacement M&S (required to make the site available for development) will satisfy this need, and ensure that the requirements of Policy 1 can be achieved for both existing and future residents in Kew.

		<p>Accordingly, in order for the Site Allocation to be effective (consistent with the rest of the Plan), positively prepared (meets the area's needs) and justified (based on evidence) we recommend that it is amended to specifically support the principle of the provision of improved convenience retail goods floorspace on the site as part of the replacement retail development.</p> <p><u>Restrictions on the Type of Retail Provision (Convenience Goods)</u></p> <p>The existing amount of convenience retail floorspace on the site comprises approximately 760sqm (net sales area). As currently drafted the policy states that <i>'any new convenience retail provision should not exceed the floor space of the existing units, to protect the existing main centre in Kew'</i>. It is not clear what the exact intended meaning is of this (this should be clarified), nonetheless it could be interpreted as restricting the acceptable amount of convenience retail floorspace to no more than the existing. This approach would not be sound in our view.</p> <p>Firstly, a restriction would not be in general conformity with the London Plan. London Plan Policy SD7 Part A(3) (as also firmly encouraged by London Plan Policy E9 (Part C(6)) and Policy H1) requires boroughs to realise the full potential of existing out-of-centre retail parks. As a starting point, SD7 supports the principle of replacement out-of-centre retail floorspace of up to the same quantum as the overall existing. Aside from the restriction on overall retail floorspace SD7 does not provide any restrictions on the redevelopment, replacement, or re-organisation of existing retail or leisure space – specifically it does not impose any restrictions on what type of goods the retail floorspace can be used for. It then confirms the acceptability of increasing the amount of retail at such sites where this can be justified by sequential and impact policy tests in accordance with the national planning policy approach to control such matters.</p> <p>Secondly, the evidence set out in the Council's Retail Study Part 1 does not support a restriction on the amount of convenience retail floorspace at the site. A restrictive approach would require a clear and reasonable justification which is not provided in either the Phase 1 retail study and / or the draft Plan itself. In particular, it is briefly suggested that the proposed approach is to protect the health of town centres but no evidence is provided in order to demonstrate that the provision of replacement / net additional convenience goods floorspace at Kew Retail Park will lead to any harm to nearby defined 'town centres'. Accordingly, a restriction would not be justified.</p> <p>This is in the context that policies should be positively worded.</p> <p>As a final comment, we note that the allocation of Kew Retail Park is not the only site allocation to mention convenience goods floorspace in the draft Local Plan. The other references are in relation to a small number of 'town centre' allocations where a cap / limit / restriction has not been imposed.</p> <p>Accordingly, in order to be effective (consistent with the rest of the Plan), positively prepared (meets the area's needs) and justified (based on evidence) we recommend that the policy is amended to remove any restrictions on the amount of convenience retail goods floorspace on the site as part of the replacement retail provision.</p> <p><u>Sequential Test and Impact Assessment Requirements</u></p> <p>For the reasons set out above, we recommend that the site allocation wording is amended to explicitly support the principle of substantial replacement retail development, including an increase in the amount of convenience goods floorspace in order to ensure the soundness of the policy.</p> <p>We do not consider it necessary for the site allocation to define the acceptable amount of retail floorspace (in order for it to be sound) – rather this should be a matter dealt with at the planning application stage. With this approach it will be necessary to satisfy sequential and impact policy tests at the planning application stage in line with London Plan Policy SD7 and Local Plan Policy 18. Bearing in mind that the principle of substantial retail will have been established in the policy, the extent of the assessment work required to satisfy the policy tests should be proportionate.</p> <p>In order for the policy to be effective (and cognisant of NPPF para 16d) we recommend that the policy (or supporting text) is amended to account for this.</p> <p>5. Land Uses (Offices)</p> <p>The draft allocation requires the provision of offices (including the provision of affordable workspaces for small to medium sized companies). We consider this to be unsound on the basis that it is not justified by evidence nor consistent with national policy. It would also be inconsistent with other parts of the plan and therefore risks not being effective.</p> <p><u>Existing Use</u></p> <p>The site does not currently accommodate any office (or other employment) uses. Accordingly, unlike retail uses (for example) the principle of such uses on the site has not been established, nor would redevelopment pose a risk of existing office/employment uses being lost.</p> <p><u>Evidence Base</u></p> <p>The Employment Land and Premises Needs Assessment (2021) identifies a need for additional office and industrial use accommodation in the borough. It identifies a need for a minimum 40,000sqm of office accommodation over the plan period, however that there is a very limited pipeline supply of sites to meet this need.</p> <p>It recommends that these needs can best be met via the intensification of the borough's existing employment sites and/or the repurposing of land/buildings within the borough's town centres (particularly Richmond town centre which is highlighted as a commercially attractive office location).</p> <p>It also recommends that office supply is boosted 'wherever the opportunity presents itself. Kew Retail Park is referenced at paragraph 5.46 as a potential 'opportunity' for potential supply of offices in the context of town centre sites (which we note is not the case – it is an out-of-centre location).</p> <p><u>National Planning Policy/London Plan</u></p> <p>In order to be sound, the recommendations of the aforementioned needs assessment should be applied in a manner that is in accordance with national planning policy and in general conformity with the London Plan.</p>	
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Consistent with this is London Plan Policy E1 which directs new office uses in Outer London to town centres and existing business parks.</p> <p><u>Consistency with Other Draft Local Plan Policies</u></p> <p>In order to be effective, there must be consistency between each policy in the new Local Plan in order that it can be read ‘as a whole’.</p> <p>In line with national/London Plan policy, Policies 23 directs ‘major’ new office development to town centres, with smaller scale office development directed to designated Key Business Areas and other ‘suitable locations’. Similarly, Policy 21 directs other major employment development to town centres and designated employment sites, while only allowing ‘other’ (which we interpret as non-major – i.e. less than 1,000sqm floorspace) to be located elsewhere.</p> <p><u>Soundness Issues with Current Draft</u></p> <p>As currently drafted, the site allocation requires offices (including associated affordable workspace) to be provided on the Site. While we recognise that there is an identified need for office accommodation in the borough, the Site is not in a town centre nor in a designated employment area therefore allocating it for ‘major’ office development would not accord with national or London Plan policies nor would it be consistent with other policies in the draft plan. The broader policy basis would support ‘minor’ office uses on the Site which could form part of a range of small-scale complementary uses (see next section), nonetheless we consider that an express ‘requirement’ for offices (as currently drafted) would not be justified, effective, nor consistent with national policy.</p> <p>6. Land Uses (Other Non-Residential Uses)</p> <p>In line with the overall approach of the policy as currently drafted, we support the inclusion of a range of small-scale other uses that would add to the vibrancy and vitality of the new community. The requirement as currently drafted is very specific (retail, café’s and offices) which would prevent other perfectly acceptable other uses from coming forwards. In order to ensure the effectiveness of the policy we recommend that a more flexible approach is adopted to other uses as per the recommended amendments.</p> <p>7. Land Uses (Public Open Space)</p> <p>The policy wording regarding the provision of public open space is not entirely consistent with Policy 37. In order for the plan as a whole to be effective, there must be consistency between policies. As per our recommended amendments, we suggest that detail is stripped out of the site allocation and replaced with a ‘sign-post’ to Policy 37.</p> <p>8. Design</p> <p><u>Connections and Permeability</u></p> <p>The site allocation calls for improving the permeability of the site by creating connections through to Kew Riverside and improving links to the River Thames. While we agree that this is desirable and would be a benefit to the scheme and the wider area, there are issues outside of the landowners’ control that prevent direct options specifically along the eastern boundary. The Kew Riverside development is under private land ownership and the roads are not adopted by the local authority. There are also significant level changes along the eastern boundary where the level drops on the Kew Riverside side to allow for basement parking. This further restricts the potential of connecting the two sites.</p> <p>Therefore, creating new connections into Kew Riverside from the KRP site will be extremely challenging. There is potential to connect to the open space along the southern boundary which then allows access to the River Thames. We suggest that the policy is amended to state that new connections/permeability is provided ‘where feasible’ to ensure that it is properly justified and effective.</p> <p><u>Public Space & Landscape</u></p> <p>While ‘tree lined avenues’ may be typical of the area we feel that this is too prescriptive for the site allocation and may limit the landscape response to the site. We recommend that the policy is amended accordingly.</p> <p><u>Building Heights</u></p> <p>We welcome the requirement for development at Kew Retail Park and the wider area of Kew to improve and transform parts of East Kew through by improving the sense of place, public access and legibility. Based on our findings following a review of the Urban Design Study (2021), the Place-based Strategy for Kew is, however, unsound in its current form, as it is not supported by a sufficient evidence base to support specific building heights identified for the KRP site.</p> <p>The prescribed building heights that form part of the policy are not sufficiently backed up by a robust evidence base in the Urban Design Study. We believe that a range of heights across the site would be more suitable. We will produce our own evidence to justify this as part of the preparation of the planning application for the site.</p> <p>Please refer to our comments regarding the Urban Design Study and our representations to Policy 45. [See comment 1037 in relation to the Urban Design Study and comment 1038 in relation to Policy 45] [See Appendix 6 for Appendix A Walk-time to Supermarkets and Appendix B Site Ownership Plan]</p>	
-		Site Allocation 31: Kew Biothane Plant, Mellis Avenue, Kew		
629	Catherine Rostron	12 Place-based Strategy for Kew, Site Allocation: Kew Biothane Site	<p>I agree that this would be suitable for housing but do not believe that developments higher than the height if the existing Kew Riverside development can be justified fir the reasons given above about the visual impact. In addition most people do not want to live in high rise developments.</p> <p>I also feel that social housing would be a particularly good use of the site as this part of the borough has very little of it.</p>	<p>The site has not been identified as part of the Urban Design Study 2021 as a Tall and Mid Rise Buildings Zone. The Site Allocation makes clear that development should have regard to the design objectives and general guidance relating to the local character of the area set out in the relevant character area profiles and design guidance set out in the Urban Design Study and Village Planning Guidance,</p>

				<p>and that there is an expectation that the character and openness of Metropolitan Open Land on the site is improved. Any future planning application, including consideration of heights of new buildings, would be assessed against this criteria accordingly. It is not considered that amendments to the current text are necessary.</p> <p>With regards to the people living in high rise developments, whilst these have not been explicitly set out in the Site Allocation as an aspiration for the site, as a general point taller buildings are an established and acceptable form of residential development in London and personal preference is not a material planning consideration. Any future application for residential development would be assessed against Local Plan Policy 13. Housing Mix and Standards.</p> <p>General support for social housing is noted. Local Plan Policy 11. Affordable Housing requires the provision of social housing as part of an affordable housing offer.</p> <p>The site has not been identified as part of the Urban Design Study 2021 as a Tall and Mid Rise Buildings Zone. The Site Allocation makes clear that development should have regard to the design objectives and general guidance relating to the local character of the area set out in the relevant character area profiles and design guidance set out in the Urban Design Study and Village Planning Guidance, and that there is an expectation that the character and openness of Metropolitan Open Land on the site is improved. Any future planning application, including consideration of heights of new buildings, would be assessed against this criteria accordingly. It is not considered that amendments to the current text are necessary.</p> <p>With regards to the people living in high rise developments, whilst these have not been explicitly set out in the Site Allocation as an aspiration for the site, as a general point taller buildings are an established and acceptable form of residential development in London and personal preference is not a material planning consideration. Any future application for residential development would be assessed against Local Plan Policy 13. Housing Mix and Standards.</p> <p>General support for social housing is noted. Local Plan Policy 11. Affordable Housing requires the provision of social housing as part of an affordable housing offer.</p>
630	David Wilson, Thames Water	Kew Biothane Plant Melliss Avenue Kew	<p>Thames Water Site ID: Site ID: 49790 (APPROVED - 16/09/20)</p> <p>Water Response On the information available to date we do not envisage infrastructure concerns regarding water supply network infrastructure in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ</p> <p>Waste Response On the information available to date we do not envisage infrastructure concerns regarding wastewater network or wastewater treatment infrastructure capability in relation to this site/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ</p> <p>Additional Comments With regards surface water discharge, we would expect this to be discharged directly to the River Thames due to its close proximity. To the north of the proposed development site sits Kew Biothane SPS. There are also easements and wayleaves running through the east and west of the Site. These are Thames Water Assets. The company will seek assurances that it will not be affected by the proposed development. The proposed development is located within 15m of a Thames Water Sewage Pumping Station. Given the nature of the function of the pumping station and the close proximity of the proposed development to the pumping station we consider that habitable rooms should be at least 15m away from the pumping station assets as highlighted as best practice in Sewers for Adoption (7th edition)'. Future occupiers of the development should be made aware that they could periodically experience adverse amenity impacts from the pumping station in the form of odour; light; vibration and/or noise.</p>	<p>The Site Allocations format has been amended to include a description of the site/wider area and relevant constraints, to include identification of the flooding constraints for each site. Flood risk / SuDS matters are covered in Policy 8 'Flood Risk and Sustainable Drainage' of this Plan, with which any future planning application would need to comply. The inclusion of informatives would be relevant to any future decision notice and it would not be appropriate to include this in the Site Allocation. Thames Water would be a statutory consultee for any future planning application and would have the opportunity at that stage to recommend informatives. It is therefore not considered necessary to set out the requirements of developers for this in the Site Allocations.</p> <p>With regards the site's proximity to a Sewage Treatment Works, the formatting of the Site Allocations includes a 'Neighbour context' section and identification of the works has been included there. The text of the Site Allocation has also been amended to require consideration of the treatment works, as part of any future residential scheme, and the submission of an odour assessment upfront. (Note this is also a requirement for Site Allocation 14: Twickenham Stadium (Rugby Football Union), Twickenham, and so creates continuity within the Site Allocations.)</p>

			The proposed development is located within 15m of a strategic sewer. Thames Water request that the following condition be added to any future planning permission. No piling shall take place until a piling method statement has been submitted to and approved in writing by the local planning authority in consultation with Thames Water.	
-	Katie Parsons, Historic England	Site Allocations 30: Kew Retail Park, Bessant Drive, Kew and 31: Kew Biothane Plant, Mellis Avenue, Kew	[See comment 626 against Site Allocation 30]	See response to Comment 626.
631	George Goodby, Environment Agency	Site Allocation 31: Mellis Avenue, Kew	<p>This site is located within tidal Flood Zone 3 and therefore all sleeping accommodation must be located above the tidal breach 2100 flood level. The site is also located next to the statutory tidal Thames flood defences, as the embankment along the eastern boundary protects the site from tidal flooding, and therefore raisings in line with the TE2100 Plan will be required. This will need to be raised by 0.5 metres before 2065 and another 0.5 metres before 2100. To raise the embankment, the local authority and developer will need to ensure there is sufficient set back between the development and the flood defence to accommodate the raisings and future maintenance. A minimum of 16 metres set back is expected between the toe of the embankment on the landward side (western edge). This 16 metre set back would be in addition to the space needed to raise the embankment to 6.94 m AOD. It should also be noted that the Environment Agency would not accept a raising strategy or design that pushed the flood defence riverward of its current position because of the detrimental impact it would have on flood storage and the environment. The site has the potential to consider a Riverside Strategy Approach to raising the flood defences, which would benefit not only flood risk but the public realm and biodiversity too. This supports your aims for open space provision at the site. We recommend you refer back to our Riverside Strategy Approach section and attached guidance note. [See Appendix 7 for attached guidance note]. We recommend you promote this strategy within the site allocation, perhaps within bullet points 5 or 7.</p> <p>Recommended action: Please recommend a Riverside Strategy Approach is taken to achieving the TE2100 Plan flood defence raisings in this location.</p> <p>Bullet point 7 states '<i>There is an expectation that any redevelopment provides new on-site Public Open Space in addition to any external amenity space requirements, delivering multi-functional benefits including for nature conservation and biodiversity value as well as for health and wellbeing of future occupants and users, including surrounding communities</i>'. We recommend that benefits for flood risk and flood storage are also mentioned within this list.</p> <p>The wording could be amended as follows: '<i>There is an expectation that any redevelopment provides new on-site Public Open Space in addition to any external amenity space requirements, delivering multi-functional benefits including for nature conservation and biodiversity value, flood risk and flood storage, as well as for health and wellbeing for future occupants and users including surrounding communities. We recommend that a Riverside Strategy Approach is taken.</i>'</p> <p>Recommended action: We recommend you update the wording of context bullet point 7 within Site Allocation 31 to include references to flood risk, flood storage and the Riverside Strategy Approach. Please also include that we would not accept the embankment/flood defence line moving towards the river as this would impact flood storage and biodiversity.</p> <p>The buffer zone will help to reduce shading and should be free from all built development including lighting. Domestic gardens and formal landscaping should not be incorporated into the buffer zone. The buffer zone should be planted with locally native species of UK genetic provenance and appropriately managed under an agreed scheme. The buffer zone and river corridor should form an essential/valuable part of green infrastructure. Any scheme to provide a buffer zone will need to include a working methods statement detailing how the buffer zone will be protected during construction.</p>	It is not considered necessary to make specific reference to a Riverside Strategy Approach as the Site Allocation already makes clear that flood risk benefits and public realm improvements would be expected. The reformatted Site Allocations also now include a Flood Risk section which sets out all relevant flood risk constraints. The Site Allocation makes clear that any development would need to take into account the site's proximity to the River Thames and high risk of flooding. No further amendments to the wording are considered to be necessary.
-		Site Allocation 32: Pools on the Park and surroundings, Old Deer Park, Richmond		
632	Louise Fluker, The Richmond Society	Site Allocation 32 pp 123-24: Pools on the Park and surroundings, Old Deer Park, Richmond	we agree with the Council's position	Support noted.
633	Melanie Gurney, The Planning Lab, on behalf of the Royal Botanic Gardens	Site Allocations 32 and 33	Site allocations 32 (Pools on the Park and surroundings, Old Deer Park) and 33 (Richmond Athletic Association Ground, Old Deer Park) are in relatively close proximity to Kew Gardens. RBGK support the continued use of these sites for sports use, however, do not support any development that would adversely impact on the setting, views, heritage context etc. of the Gardens.	General support for the continued use of the sites for sports uses is noted. Both Site Allocations make clear that any proposal will need to take into account the Old Deer Park SPD and be considered within the context of designations of the site and surroundings, including the Grade I Listing of the Historic Park. It is therefore considered that the current wording is sufficient and no amendments are required.
634	Peter Willan and Paul Velluet, Old Deer Park Working Group	Site Allocation 32: Pools on the Park and surroundings, Old Deer Park, Richmond	<p>The fourth bullet-point in the draft text needs to be amended to refer to the fact that at present the Statement of Significance is only in an incomplete draft form and needs to be amended before formal adoption in order to take full account of the particular special interest and significance of the listed pools complex and its landscaped setting. (In this connection, the Old Deer Park Working Group has been pressing the Council to undertake such amendment repeatedly since March, 2018. The text also needs to take account of the repeated requests by the local community over the last forty years for the Pools complex and its surrounding landscaped setting to be designated as Metropolitan Open Land, like the parkland which surrounds them).</p> <p>Supporting document/evidence: Urban Design Study December 2021 (Character Area G1) Old Deer Park Conservation Area Statement Old Deer Park: The Crown Estate Landscape Strategy 1999 Old Deer Park Supplementary Planning Document 2018 Draft Statement of Significance Old Deer Park: The Crown Estate Landscape Strategy 1999 Old Deer Park Supplementary Planning Document 2018</p>	<p>It has been clarified on the Council's website in May 2022 that the Statement of Significance: Richmond Public Baths, Old Deer Park, Richmond September 2017 a draft version. It remains appropriate that the Site Allocation refers to this document. The special interest and significance of the site and its surroundings is well recorded in other documents too, including the Old Deer Park SPD February 2018, CA57 Old Deer Park Conservation Area appraisal, and Richmond and Richmond Hill Village Planning Guidance June 217. These are all identified in the Site Allocation. The text also makes specific reference to the importance that any development proposal is considered within the context of the designations of the site and surrounding area. It is therefore considered that the current wording of the text is sufficient.</p> <p>Pools on the Park is a developed parcel of land which also includes a sizable amount of hardstanding. It is not considered that the site would score sufficiently highly against the 4 criteria used as part of the Open Land Review 2021 intended</p>

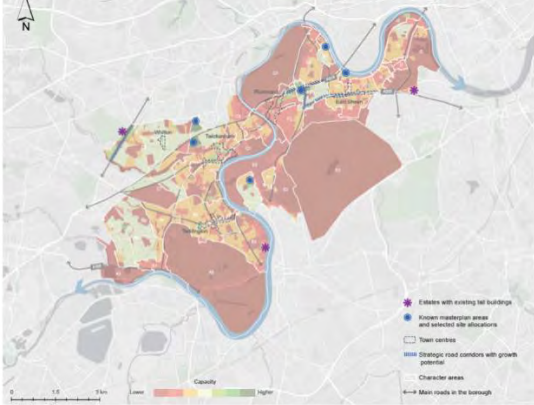
				to inform the new Local Plan and consequently there are no plans by the Council to extend the surrounding MOL designation to include the site.
635	Catherine Rostron	12 Place-based Strategy for Kew, Site Allocation: Pools on the Park / Old deer park	I agree the facilities located here could be improved and extended. The borough lacks youth facilities which would make a great addition to the sports facilities. In addition the site does provide great opportunities for habitat enhancement, re-wilding etc. The current open space is characterless and underused.	General support for retention and extension of facilities noted. Sports facilities could include activities aimed towards young people but it is not considered appropriate to amend the text to specifically cite youth facilities, as this could detract from the site's primary function as a sporting facility. Support for biodiversity enhancement is noted. The Site Allocation makes clear that development would need to take account of the Old Deer Park SPD, which sets out opportunities for supporting the Park's wildlife and conservation role. The current wording of the Site Allocation is considered to be sufficient and no amendments are required.
-		Site Allocation 33: Richmond Athletic Association Ground, Old Deer Park, Richmond		
636	Louise Fluker, The Richmond Society	Site Allocation 33 pp 125-6: Richmond Athletic Association Ground, Old Deer Park, Richmond ;	we agree with the Council's position	Support noted.
637	Melanie Gurney, The Planning Lab, on behalf of the Royal Botanic Gardens	Site Allocations 32 and 33	Site allocations 32 (Pools on the Park and surroundings, Old Deer Park) and 33 (Richmond Athletic Association Ground, Old Deer Park) are in relatively close proximity to Kew Gardens. RBGK support the continued use of these sites for sports use, however, do not support any development that would adversely impact on the setting, views, heritage context etc. of the Gardens.	See response to Comment 634.
638	Peter Willan and Paul Velluet, Old Deer Park Working Group	Site Allocation 33: Richmond Athletic Association Ground, Old Deer Park, Richmond	No change proposed. Supporting document/evidence: Urban Design Study December 2021 (Character Area G1) Old Deer Park Conservation Area Statement Old Deer Park: The Crown Estate Landscape Strategy 1999 Old Deer Park Supplementary Planning Document 2018	Noted.
-		Place-based Strategy for Mortlake & East Sheen		
639	Peter Eaton	Section 13 - Place-Based Strategy for Mortlake + East Sheen Site Allocation 34: Stag Brewery, Lower Richmond Road, Mortlake Pgs 131-133	<p>'Village' Wording in the text headed '<i>Site Proposal</i>' has made some proposed changes. The word '<i>village</i>' before '<i>heart</i>' has now been proposed to be removed. This is inconsistent with both the '<i>Vision</i>' wording in the text which seeks to create a new focus to the village by redevelopment of the Stag Brewery site, and with the broader '<i>Village Planning Guidance SPD Dec 2015</i>' - which identifies that the borough is divided into a series of smaller distinctive character areas. Here section 4 - Vision - repeats the goal to '<i>create a new heart to the village by redevelopment of the Stag site.</i>' The word '<i>village</i>' should be retained for consistency and absolute clarity on the <i>Site Allocation</i> wording itself as well as the overarching '<i>Vision</i>' statement. In the section headed '<i>Context</i>' - first bullet point - the reference to the Stag Brewery Planning Brief SPD 2011 has been added. This is a welcome change/addition for clarity and retains the relevance of this document into the future, at least for the life of the new Local Plan - when adopted. On the third bullet point the words '<i>village</i>' - 'and centre' should be retained as per the existing wording.</p> <p>There is concern that the proposed removal of the word '<i>village</i>' and the diagrams 27.27 / 27.28 in Appendix 3 could create the opportunity to excessively develop the Stag site with buildings of 5-6-7 floors predominating and covering too great an extent of the site, thus conflicting with the local context and heritage assets. There ought to be greater emphasis in the text on retaining and enhancing the '<i>village character</i>' of the area.</p> <p>'School' On the fourth bullet point - this mentions '<i>There is a clear need</i>' The Council's School Place Planning Strategy may set out the requirement for a new secondary school but the '<i>clear need</i>' for a super-sized 1250 pupil secondary school has been strongly challenged by the community. Also that Strategy does not taken into account the likely damage/harms to the sustainability of the existing local secondary schools if a new large secondary school were to be built on the Stag site, and does not include any impact assessment on the context or local infrastructure. Of concern too is the specific harm which could be caused to the viability of the 6th Forms of the two existing local secondary schools. Any updated Strategy needs to take all these factors into account as well as the major changes and reductions in population identified by the ONS. Despite reported arrivals of families into Richmond and Kingston from Hong Kong, RPA has no HK pupil intake, and Christ's just 8, with spare capacity reported as still available in both schools. The words, '<i>There is a clear need</i>' should be removed until the planning authority is presented with evidence to substantiate this claim. The Stag site school was 'awarded' to the borough as far back as 2015 when previously proposed in Tower Hamlets, who had then decided the school would be surplus to requirements/needs. That previous proposal had been accompanied by a detailed impact report to justify its requirement. No such detailed summary has ever been presented for public scrutiny for the proposed Stag school as far as we are aware.</p>	<p>The Site Allocation states 'There is a need to create a new heart for Mortlake'. The vision section of the place-based strategy uses the word '<i>village</i>' in the sentence simply to avoid repetition of the word 'Mortlake': 'The vision for Mortlake is to create a new focus to the village'. The addition of the word '<i>village</i>' to the identified sentence in the Site Allocation would be superfluous and would not alter the aspirations of the Site Allocation or place-making policy in any way. This also applies to 'centre'. Mortlake is not included in the Centre Hierarchy as shown in Table 18.1 in Policy 17. Supporting Our Centres and Promoting Culture and thus it is not considered that the interchangeability of 'heart', 'village' and 'centre' when referring to Mortlake will result in development of an inappropriate scale for this area. Further, all areas identified within Section 5 of the Local Plan for place-making strategies are referred to as a 'place' for consistency. It is therefore not considered that an amendment is necessary.</p> <p>Support for reference of the Stag Brewery SPD in the Stag Brewery Site Allocation is noted.</p> <p>The heat maps taken from the Urban Design Study, as shown in the diagrams in Appendix 3, highlight via the darker shading where a tall building zone (7 storeys) is identified, and via the lighter shading where a mid-rise buffer zone (5-6 storeys) is identified. The UDS makes clear that there may be opportunities for buildings up to 7 storeys 'within parts of the zone' (emphasis added), and that the sensitivities of the surrounding context limit the ability of the zone to accommodate tall buildings. The Site Allocation makes clear that development would need to be in accordance with Policy 45. Tall and Mid-Rise Building Zones, and notes that the UDS recognises the limits due to the sensitivities of the surrounding context. Other policies within the Local Plan relating to design, heritage and neighbouring amenities would also be relevant to any future planning application. The Site Allocation further emphasises that development should have regard to the design objectives and general guidance relating to the local character of the area set out in the relevant character area profiles and design guidance set out in the Urban Design Study and Village Planning Guidance. It is therefore considered that the text as existing makes clear that any development must take account of the prevailing character of the area. No amendments are required.</p>

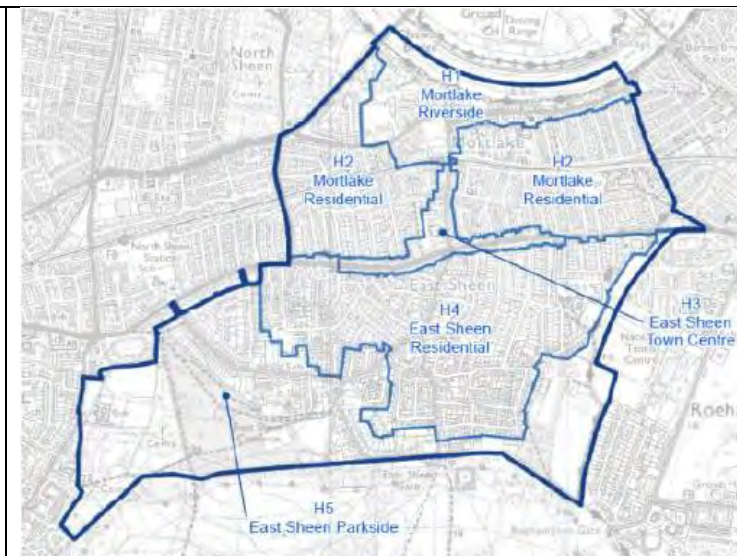
				<p>The London Plan Policy S3 Education and Childcare Facilities requires Councils to prepare Development Plans that are informed by a needs assessment of education facility needs, and identify sites for future provision. Policy 50. Education and Training of the Local Plan Part A sets out that the Council will work with partners to encourage the provision of facilities and services for education, and (3) identify new sites for educational uses as part of this Plan, working with landowners and developers to secure sites to ensure sufficient spaces can be provided.</p> <p>The Council’s School Place Planning Strategy identified the site for a secondary school in 2015. The version adopted by the Council’s then Cabinet in February 2018, sets out that demand for secondary school places had increased and was forecast to increase significantly further, with a continued requirement for the provision of a new secondary school in the eastern half of the borough. A revised strategy adopted by the Education and Children’s Services Committee in December 2019 set out, inter alia, the following developments since the 2018 Strategy:</p> <ul style="list-style-type: none"> • An overall decrease in demand for Reception places except in the eastern half of the borough, where there had been a reversal of that trend in 2019; • An outline of the need for a new secondary school – Livingstone Academy West London (‘Livingstone Academy’) (at the Stag Brewery site) – to be opened in the eastern half of the borough; • The need for additional places to be provided in the eastern half of the borough for 2018 and 2019 entry. <p>Since then, Achieving for Children (AfC) – the body responsible for ensuring a sufficiency of school places in Richmond Borough and oversight of school admissions policies, procedures and management – has published a revised School Place Planning Strategy March 2023, which has now been approved by the Education & Children’s Services Committee and is an adopted document. The revised strategy sets out the school place planning developments since the adoption of the December 2019 strategy and then assesses forecast demand for school places in the mainstream primary and secondary phases. Key points are that:</p> <ul style="list-style-type: none"> • The overall population has decreased, but has increased in the mainstream secondary phase; further, demand for state-funded Reception places in primary-phase schools in the borough has not reduced in direct correlation; • Demand for places at the three schools in the eastern half of the borough has continued to grow; • The ongoing uncertainty as to whether Livingstone Academy will secure planning permission is imperilling the Council’s ability to continue to meet its statutory duty to provide state-funded secondary school places for its residents in Kew, Mortlake, North Barnes and North Richmond, as per Section 14 of the Education Act 1996; • There is a pressing need for a fourth secondary school to be established within the eastern half of the borough; • It would be unsustainable and imprudent to rely on temporary expansions of capacity at the 3 existing schools and/or any spare capacity at out-borough schools. <p>With regards to population numbers, the Council’s autumn pupil census, as shown in the Strategy, shows that the overall pupil population from Reception to Year 13 has increased every year since 2015. Within that overall roll-number increase, the total pupil secondary-phase school population has increased by 2,768 children and young people. As at primary level, for the borough there has been a very large increase in the numbers of in-year admissions applications for secondary-phase places, with an especially large increase between the last two full school years. These applications have led to a 5.1% increase in the total roll in Years 7-11 compared with autumn 2021: 10,091 children at present compared with 9,597. In the primary-phase section, in-year applications are expected to continue to increase. With regards to in-borough Year 7 application numbers, the decrease of 71 for 2023 is contained within the western half of the borough and masks a net increase of 38 first-preferences for the 3 schools in the eastern half. Total</p>
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				<p>applications for the borough’s 11 schools show that numbers of first-preference applications have increased for 6 of them, including all 3 in the eastern half.</p> <p>The Strategy goes on to state that while there remains some, albeit limited, secondary-phase capacity in the western half of the borough, providing Year 7 places in the eastern half has remained a challenge in the absence of the anticipated opening of Livingstone Academy. In response, an extra, temporary ‘bulge’ class has been provided at Christ’s School in 3 of the last 4 years and places have been extra-offered at Richmond Park Academy in the expectation that the number of children would come down to PAN (Published Admissions Number, the number of pupils that the school can admit into each relevant age group based on the total number of pupils the school has been assessed as being able to admit) before admission in September. For 2022 entry, however, the number did not reduce and as a result, together with the bulge class at Christ’s and an additional 16 offers which were made at Grey Court School, the 3 schools between them exceeded their collective substantive PAN by 54 children, and at the autumn census 2022 were shown to be 136 children over their PAN. The schools’ ability to continue to accommodate additional children is restricted by their limited space.</p> <p>The Strategy gives a detailed methodology for the reasoning underpinning the Council’s understanding for the need for a fourth state-funded secondary school in the eastern half of the borough. Key points are:</p> <ul style="list-style-type: none"> • There is very little admissions ‘traffic’ between the two halves of the borough, mainly due to the river acting as both a physical and ‘psychological’ barrier, this the two halves are discrete school place planning areas and are reported to the Department for Education as such; • The borough has always been reliant on parents opting for private-sector schools or moving out, especially within the eastern half; however, the increase in the reputation and Ofsted rating for Richmond state-funded schools overall, together with economic factors such as downturn and cost of living, has fueled increased demand for non-fee paying schools, and could lead to demand exceeding supply in an unmanageable manner; • All 3 schools in the eastern half (Christ’s, Grey Court and Richmond Park Academy) are oversubscribed; • Each of the 3 schools offer a significant number of places to out-borough children (and by law no school is able to grant priority to children on the basis of residence within the Richmond Borough); • Despite over-offering places at the 3 schools, there have been a high number of children unplaced in the north east of the borough; • If the 30 extra children in the bulge class are added to the additional offers at Richmond Park Academy plus the 72 unplaced children, there were a total of 180 children living in the north east of the borough for whom a local place within the substantive permanent capacity could not be offered on National Offer Day in 2022; • The proposed levels of housing development, including the Barnes Hospital site, Ham Close site, Kew Retail Park site and Stag Brewery site, which if delivered are anticipated to deliver over 4,000 new residential units, will increase the demand for places further still; • The frequency of need to convene Fair Access Panels has grown because placing children and young people at a school within a reasonable distance from their home has become more difficult. <p>It is therefore considered that there is a clearly demonstrated need for the provision of a fourth secondary school in the eastern half of the borough, and that this is underpinned by sound evidence and research via the Strategy. It is therefore not considered that this aspiration should be removed from the place-making strategy or Site Allocation.</p> <p>The Strategy addresses the point that the planned Year 7 capacity for Livingstone Academy at the anticipated Stag Brewery site development is 180 places, which would mean that the school could clearly have been filled without impacting any of the other 3 schools. This is before the future impacts of the national economy</p>
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				<p>and housing developments are taken into account. No amendments to the place-making strategy or Site Allocation are necessary on this issue.</p> <p>With regards the impact on context and infrastructure, the Stag Brewery Site Allocation makes clear that development would need to have regard to the relevant character area in the Urban Design Study and Village Planning Guidance. The impact of development on existing infrastructure can be assessed as set out in Policy 49. Social and Community Infrastructure' Part F and therefore it is not considered necessary to refer to this in the Site Allocation. The updated Infrastructure Delivery Plan 2023 also identifies future infrastructure and service needs for the borough. No amendments to the place-making strategy or Site Allocation are necessary on this issue.</p> <p>The Strategy also addresses the concern raised about the impact a new school and sixth form would have on the existing sixth forms as Christ's and Richmond Park Academy. The Strategy states that post-16 options for young people in the Richmond Borough include not just sixth forms but also colleges such as Esher, Kingston, Richmond upon Thames and Strode's, noting that young people are much more prepared and able to travel further afield for their post-16 education than younger children. However, despite much wider competition than for pre-16 admissions, the sixth forms at Christ's and Richmond Park Academy have both doubled in numbers of students since their introduction less than a decade ago in 2015. If planning permission were granted for Livingstone Academy, the earliest the sixth form could realistically open would be September 2026, and because it would build up its year groups one by one over a 7 year period, it would therefore not have cohorts of students in both Years 12 and 13 until September 2023. Thus Christ's and Richmond Park Academy would have 10 years at least to continue to build up their sixth form numbers so that they can withstand the competition from another local option. The Strategy further notes that Livingstone Academy would likely draw almost all its sixth form students from its own Year 11. It is therefore not considered that any amendments to the place-making strategy and Site Allocation are necessary on this basis.</p> <p>With regards the need for a detailed impact report to justify the school's requirement, the draft and adopted School Place Planning Strategies mentioned above are considered to provide a robust evidence-based justification and no amendments are therefore needed to the place-making strategy and Site Allocation on this basis. If there is any formal change to the School Place Planning Strategy adopted by the Council in future, then a modification to the Plan would be considered appropriate.</p>
640	William Mortimer	13 Place-based Strategy for Mortlake & East Sheen 14 Place-based Strategy for Barnes	<p>My key concerns for the redevelopment of Stag Brewery are the stresses on the riverside corridor imposed by the addition of 1,114 new dwellings and a proposed secondary school. The latter is not anticipated in the 2011 plan and would occasion at least 2400 movements per day in addition to those generated by the inhabitants of the new dwellings.</p> <p>Aside from the architecture, which has improved in the new plan I have raised issues about the impediments for disabled persons, wheel chair users and young mothers unless there are development at Mortlake station to enable the tracks to be crossed when the gates are closed. I foresee accidents at the railway crossing occasioned by more pedestrians and cyclists trying to cross when barriers are rising or falling and some will be fatal. The solution should be the enhancement of the station itself to provide a wheelchair-friendly underpass. Steps just will not do. Gently sloping and wide corridors with booths for tradespeople to the side would make travellers and locals welcome on arrival or train departure or simply traversing the tracks to and from East Sheen.</p> <p>I am also concerned that the number of dwellings (approximately a quarter of the entire number of dwellings in Barnes if I am not mistaken) will place a load on the water management of rain and dirty water draining built by the Victorians Alas Richmond is not connected into the Super Sewer and we must be assured that the consequence of the new development will not be raw sewage dumping in the Thames or more frequent flooding.</p> <p>Apart from the loss of the Medical Centre amenity in the new plan, which will add to travel for vulnerable and elderly people my calculation is that only half the school children will exercise every two weeks and half those will be on MUGA rather than a full-sized pitch. This hardly bodes well for the provisioning of a healthier environment in an ecologically friendly new build.</p> <p>In terms of Affordable housing there are no specifics in terms of the Social housing element including provisions for key workers and Special Needs young persons who have completed their school years and therefore required supervised living provisions. The laudable efforts to reduce traffic on the A3003 have not been helped by a total absence of imagination for the use of the river Thames in its historical role as the transport artery of London. In redeveloping the waterfront for the leisure users it is a major flaw not to bring the catamaran service which terminates today in Putney right up the river to Richmond. Mortlake would</p>	<p>Policies 34. Green and Blue Infrastructure and 40. River and River Corridors of the Local Plan encourage the enhancement of, and connectivity to, the River Thames and the borough's riverside corridors. This is reiterated in the Stag Brewery SPD, which highlights the opportunity to create a new open space link from Mortlake Green to the Thames and to enhance the landscape around the site and along the river, including the considerable scope to improve the amenity of the widened area along the Riverside towpath, as well as the need to protect and enhance the special character of the Thames Policy Area. It is recognised that the preferred development on this site would result in a substantial uplift of occupiers and users; however, it is not realistic that each individual person would use the riverside corridor at the same time. Given the benefits to the riverside corridor which the Stag Brewery Site Allocation expects from development, it is considered that that the requirements are sufficient so as to ensure that no unacceptably adverse harm to the riverside corridor would result from a future development. It is therefore not considered that amendments to the place-making strategy or Site Allocation area required.</p> <p>The 'policy' section of the place-making strategy has been amended to include the mention of improved accessibility with regards to aspirations for Mortlake Station and outside public realm.</p> <p>The impact of development on existing water resources and sewage infrastructure can be assessed as set out in Policy 9. Water Resources and Infrastructure. The</p>

			<p>be a stop on the route and like Barnes has historically been used for the transportation of goods as well as people.. This would also reduce traffic via Chalker's Corner which is a pollution black spot.</p>	<p>updated Infrastructure Delivery Plan 2023 also identifies future infrastructure and service needs for the borough. Flood risk can be assessed as set out in Policy 8. Flood Risk and Sustainable Drainage. It is therefore not considered necessary to refer to this in the place-making strategy or Stag Brewery Site Allocation.</p> <p>It is not clear what the comment regarding 'loss of the Medical Centre amenity in the new plan' pertains to. It is assumed that this relates to the Barnes Hospital site. The Site Allocation for this identifies the re-provision primary and community healthcare facilities as an appropriate land use which would be supported (together with the prioritisation of the provision of a new SEN school, as well as residential uses), and thus it is not considered that reference to this site in the place-making strategy requires amendment on this basis.</p> <p>The comment regarding play space provision, is a comment on a planning application and is not considered to relate to the place-making strategy or Stag Brewery Site Allocation directly. The Site Allocation text makes clear that social infrastructure uses and health uses, are supported on this site. The Site Allocation does not therefore preclude a health centre from coming forward and no amendments to the text are required.</p> <p>The Site Allocation also supports the retention/and or provision of the designated playing fields to the south west and states that development would be assessed against Policy 36. Other Open Land of Townscape Importance. It makes clear that any redistribution would need to be equivalent or improved in terms of quantum, quality and openness (emphasis added), and in line with Policy 37. Public Open Space, Play, Sport and Recreation, the NPPF and Sport England Policy. Ecological considerations can be assessed as set out in Policies 38. Urban Greening and 39. Biodiversity and Geodiversity. It is therefore considered that the current wording with regards the aspirations for the site are satisfactory and no amendments are required.</p> <p>The catamaran service, or Thames Clippers, is operated by Uber Boat, which is a private company. The Council is not aware of any plans from the business to extend the service to Mortlake, however, it is not considered that there is anything in the place-making strategy which would preclude this from being considered should the opportunity ever arise in the future. No amendments to the text are considered to be necessary in this regard.</p>
641	Richard Carr, Transport for London (TfL)	Place Based Strategy for Mortlake and East Sheen - Other Initiatives	<p>We note the reference to a potential cycle route between Mortlake and East Sheen in TfL's Cycling Action Plan. This is indicative and more work will be required to determine the actual alignment of any cycle route.</p>	<p>Noted. The cycle route is mentioned in the place-making strategy as an aspiration the Council supports, and it is not the intention for the policy to include specific details, noting too that the potential for a cycling route between Mortlake and East Sheen identified in TfL's Strategic Cycling Analysis, as part of a potential new connection through East Sheen linking to Putney, are an aspiration only and the Mayor confirmed in December 2022 during Mayor's Question Time that TfL does not have any current plans to deliver these facilities. No amendments to the place-making strategy are required.</p>
642	Theresa Oddelm, The Royal Parks	Place-based Strategy for Mortlake & East Sheen – comments specific to biodiversity and the Royal Parks' Environmental Designations	<p><u>Area Profile (page 127)</u> This needs greater recognition of the nature conservation designations of Richmond Park (SAC, SSSI and NNR) as immediately adjacent to the area.</p> <p><u>Policy (page 101)</u> Whilst this policy encourages 'active travel and exercise', it should also identify the need to protect Richmond Park SAC, SSSI and NNR from impacts associated with recreational pressure, as well as other impacts associated with development, including increased traffic and light spill. It should also include measures to reduce traffic in the vicinity of, and through, Richmond Park.</p>	<p>The place-making strategy references that the area is located between Richmond Park and the River Thames; however, Richmond Park is located within a separate place-making strategy (Ham, Petersham & Richmond Park), where the nature conservation designations are listed. It is therefore not necessary to mention them again here.</p> <p>See response to comment 568 regarding recreational pressures and environmental impacts arising from development, and possible impact on the Park. It is therefore not felt necessary to repeat all these policy protections in the place-based strategy.</p> <p>See response to comment 568 regarding trialled measures to reduce impact of cut-through traffic and the recognition of the Park already in the Local Plan. It is not considered necessary to set out further details in the place-based strategies, which are linked to what future development is expected to contribute to.</p>
643	Myrna Jelman	General comment in relation to Upper Richmond Road (West) as a growth corridor	<p>I was very disappointed to discover that Upper Richmond Road (West) was identified as a 'strategic road corridor with growth potential' (See your map below). This is completely out of keeping with the look and feel of the local area and I am very unhappy</p>	<p>Upper Richmond Road (A205) is a major red route connecting North Sheen, via East Sheen and Mortlake, to Putney to the west, which has been identified in the</p>

			<p>about this. Similarly, Manor Road may be ‘ripe for development’ in your view but I imagine you allowing Mid-size development along its length of up to 5 storeys, also negatively changing the look and feel of the area.</p>  <p>The map shows the Mortlake and East Sheen area with various colored zones. A legend indicates: Tall buildings (purple dots), Urban Design Study (red and orange areas), Town centres (yellow areas), Strategic road corridors with growth potential (blue lines), Character areas (green and blue areas), and Main roads in the borough (black lines). A scale bar and north arrow are also present.</p>	<p>Urban Design Study as a ‘strategic corridor with growth potential’. The road traverses character areas H2, H3 and H4 of the Mortlake and East Sheen ‘place’. Its capacity for mid-rise and tall building development has been identified as being generally at the lower end of the scale. That an area is considered having potential for growth does not mean that development would not need to be sensitive and respond appropriately to the prevailing character, which is set out in detail in the UDS. It is also identified in the place-making strategy as comprising terraced cottages and houses to the north, whereas in East Sheen it is noted to bisect the centre and has inevitably had a major impact on its appearance and character. The overall strategy recognises that East Sheen Town Centre (Character Area H3) is considered to have a fair sense of place and heritage with a high sensitivity to change overall, although the western part of the town is considered to have relatively lower sensitivity. It is recognised in the place-making strategy that the quality and functioning of the town centre has been negatively impacted by several unsympathetic developments, the dominance of traffic along Upper Richmond Road (the South Circular) and the loss of coherence in shop frontages. The strategy is therefore to restore the historic character and improve its public realm and sense of identity, particularly along Upper Richmond Road, to make it a more attractive destination. Any development would therefore be expected to be sympathetic to the prevailing character of the area in line with the aspirations highlighted in the place-making strategy. It therefore not considered that amendments to the text are necessary.</p> <p>There is no specific mention of Manor Road in the place-making strategy for Mortlake and North Sheen. The area around Lower Richmond Road/Manor Road is identified in the Urban Design Study in sub-area F3a is identified as having a relatively lower sensitivity to change owing to the fragmented urban grain and presence of detracting features, with positive change having the potential to enhance character in this area.</p> <p>The tall and mid-rise building zones identified near to Manor Road are located in the Richmond and Richmond Hill ‘place’ and not Mortlake and North Sheen. The site is the Sainsbury’s and car park to the south of Lower Richmond Road at North Sheen and the Homebase site to the west, at Manor Road. The zone occupies the area within the centre of the existing Sainsbury’s site on Lower Richmond Road and Homebase, east and west of Manor Road respectively. The area to the west of Manor Road (the Homebase site) is the subject of a recently consented tall building application. The area to the east of Manor Road incorporates the site allocation on the existing Sainsburys site and car park. It also extends further east to include existing developed areas with relatively larger scale and grain. The strategy for North Sheen Residential notes that any new taller elements should respect existing character, have design elegance and quality that marks them as landmarks with special attention to materials and details and avoiding plain façades. The scenario testing for this zone illustrates that there is potential for some height if set back within the site, but achieving a sensitive relationship with the surrounding smaller scale and grain will be fundamental. The remainder of Manor Road has not been identified as a Tall or Mid Rise Development and there is no mention in either the place-making strategy or UDS as it being ‘ripe for development’. No amendments to the text are considered to be necessary.</p>
644	Tim Catchpole, Mortlake with East Sheen Society	Place-based Strategy for Mortlake & East Sheen	<p>Our Society has a sub-group of six who have looked at your document comprising an Urban Planner, Architect, two Heritage Experts (both ex-English Heritage), Transport Planner and Civil Engineer. Our comments, which have been arranged in accordance with your sequence of sections, have been considered and approved by our Committee of ten.</p> <p>We agree with this. However, we have a slight disagreement with your boundary of our area. You describe Mortlake & East Sheen as a ‘place’ (previously as a ‘village’) and define its boundary according to the character area boundaries identified in your Urban Design Study (see figure below), whereas our Society has always defined its area as based on the Parish boundary of Mortlake with East Sheen (see figure below alongside). In our view the Parish boundary equates better with the catchment area not only of the shopping centre but also of the cultural quarters (as referred to in your Update Plan) which include our churches, these being used for a variety of cultural events, not just for worship. It should be noted that the Parish of Mortlake with East Sheen includes the Mortlake Crematorium and its adjacent cemetery and excludes Christ’s School and its adjacent cemetery.</p>	<p>General support for the place-making strategy noted.</p> <p>The method for defining the boundaries of the character areas is set out in the methodology of the Urban Design Study pp. 351-353 (2021 version). This explains that, alongside field work, the following sources of information were used to define the boundaries:</p> <ul style="list-style-type: none"> - The Village Planning Guidance SPDs - Ward boundaries - Existing town centres and areas of regeneration - Conservation Areas <p>Wherever possible, the UDS has followed Conservation Area boundaries and in particular aimed to not split these. In some cases CAs have been grouped because</p>



We agree with the definitions of character areas H1, H2 and H3 but there seem to be problems with the boundary between H4 and H5. In particular, Martindale and Spencer Gardens on the north side of Christchurch Road are in character with H4, not H5, and Sheen Mount Primary School is split between both character areas, which makes no sense. This boundary needs refinement. The area profile does not mention the cemeteries in our area, of which there are several, including their importance as open spaces. Nor does it mention the important archaeological interest on the Brewery site.

We are pleased to see the focus on our town centre including improvement of the public realm and creation of public areas at Milestone Green and elsewhere. However, this needs to be tempered with an appraisal of the air quality in our town centre and what can be done to improve it.

We note your comment on the public realm at Mortlake Station. We have argued several times before that this area needs to be a 'site allocation' (indeed it was such in a previous Local Plan some ten years ago) and are disappointed to see your answer that this is unlikely given the fragmented ownership. This is not true – there is a single ownership, namely Network Rail.

We are pleased to see your mention of the Mortlake Riverside and the Thames Path but would like to have seen some reference to the river's arcadian setting mentioned in the Mayor's recent verdict on the Brewery development.

they are at too fine a grain for the scope of the study. The existing boundaries of the Village Planning Guidance were also used wherever possible, though areas were combined to achieve a more usable scale for the scope and purposes of this borough-wide study. One of the main purposes of defining the character areas is to group together areas of similar character, based on elements such as building types, land use, CAs, urban grain, open spaces, social date and historic mapping. Within the parish boundary identified, there are parts of open spaces which in character terms sit more comfortably within other areas characterised by green space, including Kew Riverside area to the north. The school grounds and cemetery to the west are considered to sit more comfortably in terms of character with the East Sheen Common area, than the residential area to the west, due to their sense of openness. Boundaries are rarely distinct lines on the ground and are more usually areas of transition. The boundary between H4 and H5 is defined by the CAs and boundaries adopted by the Village Planning SPD. Martindale and Spencer Gardens both sit within Christchurch Road East Sheen CA. Likewise, the boundary around Sheen Mouth Primary School follows the boundary of the CAs and the Village Planning Guidance SPD. It is therefore considered that on balance the boundaries for the character areas is logical and sound and no amendments are necessary.

Open spaces are noted as a characteristic in the area profile. Nearby cemeteries are also identified in the 'Neighbour context' section of the reformatted Site Allocations. It is not considered necessary to list these within the place-making strategy, which already identifies open spaces and places of wildlife habitat as a characteristic (which would include cemeteries). No further amendments to the text are considered necessary.

Mortlake Station was identified in the Council's early work on a Site Allocations DPD during 2012 to 2014, however that was not taken to adoption. The Council's preferred use in the draft Plan 2013 was identified as 'Station and interchange improvements'. No development opportunities were identified, such as new buildings, intensification of uses, employment opportunities, etc and the site was not earmarked as an area where development was likely to come forward. The document was not taken to adoption as the site allocations work was taken forward into the Council's Local Plan 2018, which did not allocate the station as a Site Allocation. The purpose of Site Allocations has evolved since publication of the 2013 document to include sites where development is likely or encouraged to come forward, and to specify the land uses and other policy aspirations the Council would support on those such sites. The station would therefore not fall within this category, as it is a very small area, comprising only 0.2ha and there are no known plans to redevelop the site by Network Rail, noting that additional land uses would only be deliverable on top of the existing station, which is not considered to be a feasible option. The policy aspirations set out in the 2013 allocation for improvements to the station are set out in the place-making strategy. It is not considered appropriate to designate the station as a Site Allocation and therefore no amendments are necessary.

General support for the mention of the Mortlake Riverside and Thames Path is noted. The place-making strategy supports the enhancement of 'local distinctiveness around Mortlake Riverside using its relationship with the river and historic industry'. The Urban Design Study identifies that 'larger scale industrial buildings punctuate the riverside reflecting the area's industrial history...' particularly in buildings and walls around the Stage Brewery'. It also recognises that the Thames Path 'provides scenic vistas in both directions along the river' with 'coherence of the riverside character' and 'natural interest, activity, vibrancy and function for leisure and recreation' at the Thames Path and River Thames corridor being an identified as valued features. The Urban Design Study has been amended to include the following additional wording: 'Buildings within the mid-rise zone should step down sensitively to the riverside and ensure they respect the character of the Arcadian River Thames and surrounding area of 2-3 storey buildings'. It is therefore considered that the character of the riverside area has been appropriately captured in the text of the UDS, which is a

				supporting document to the Local Plan, thus no further amendments are considered necessary.
645	George Goodby, Environment Agency	Place-based Strategy for Mortlake & East Sheen	<p>The local authority should include 'improving/enhancing the riverside environment' under the 'vision' section and bullet point 6 of policy section.</p> <p>We would also like the local authority to include 'replacing active flood defences (e.g. flood gates) with passive ones (e.g. walls and embankments). If new developments are unable to design out these features, they should reduce flood risk by raising the sills of these structures'.</p> <p>Recommended action: We recommend you include improving and enhancing the riverside environment as well as replacing active flood defences (such as flood gates) with passive ones (such as walls and embankments).</p>	Improving the riverside environment is covered by Policy 40. Rivers and River Corridors; however, a reference in the policy has been added for consistency amongst the place-making strategies, in areas where development is expected to contribute to this.
646	Max Millington	Place-based Strategy for Mortlake & East Sheen	<p>- Page 129/341 – Vision for Mortlake – note the reference to a 'village' – which is consistent with the 2011 APB (reaffirmed by the present Local Plan) which refers to making a "new village heart for Mortlake". Site development applications should be consistent with this 'village' approach, not an urban approach. The statement at page 130/341 is prima facie inconsistent with this: "At Stag Brewery (Site Allocation 34) there is a significant opportunity to create a new quarter for living, with recreational and commercial uses to generate vibrancy, local employment, - community and leisure opportunities".</p> <p>- The following statement (same page) is also inconsistent by referencing a 'town' instead of a village: "The redevelopment will create vibrant links between the River and the town"</p>	<p>It is recognised that Mortlake is not defined within the Local Plan centre hierarchy as Town or Local Centre; however, that is not to say that appropriate development would not be supported in the place area. Whilst Mortlake has more of a 'village' feel compared to the borough's town centres, such as Richmond or Twickenham, it is not a village in the rural sense, and is located in Zone 3 Outer London. London Plan Policy D3 Optimising Site Capacity through the Design-Led Approach requires all development to make 'the best use of land by following a design-led approach that optimises the capacity of sites, including site allocations'. This requires consideration of design options to 'determine the most appropriate form of development that responds to a site's context and capacity for growth'. Optimisation of the site is therefore appropriate, subject to a development responding positively to the local character of the area, as per Policies LP44 and LP45 of the Local Plan, with which any planning application would need to comply. The Site Allocation makes clear that development 'should have regard to the design objectives and general guidance relating to the local character of the area set out in the relevant character area profiles and design guidance set out in the Urban Design Study and Village Planning Guidance'.</p> <p>With regards the mention of 'town' in the policy section of the place-making strategy, East Sheen is identified as a town centre in the Local Plan hierarchy, and Mortlake is identified as comprising a neighbourhood centre (at White Hart Lane). See response to Comment 639 with regards the use of 'village' and 'centre'. It is not considered that amendments to the text are necessary.</p>
647	Anna Russell-Smith, Montagu Evans on behalf of South West London and St George's Mental Health NHS Trust	Place-based Strategy for Mortlake & East Sheen	<p>The site falls in area H2 (Mortlake Residential) within the 'Places-based Strategy for Mortlake and East Sheen' in which it states that 'Barnes Hospital (Site Allocation 37) redevelopment is expected to provide a new SEN school and health centre, along with residential'.</p> <p>As set out above there is a currently extant outline planning permission for these uses, however, subject to other policies within the plan (as discussed below), this paragraph should be amended to reflect the policy position if the requirement for the community uses changes / falls away.</p>	Although there is an outline consent, there is no certainty as to whether any scheme will be implemented until it is completed. The Policy section in the place-making strategy provides only a brief summary of the expected land uses for the designated Site Allocations. Further details are provided within the text of the Site Allocations themselves. The Site Allocation for Barnes Hospital states: 'Only if community and social infrastructure uses have been explored and options discounted in line with other policies in the Plan, would the provision of housing (including affordable housing) and potential for extra-care housing, be considered as a potential redevelopment option.' Further, a reference is made to Policy 49. Social and Community Infrastructure and the option of providing 100% genuinely affordable housing to replace a social/community use without the need to provide marketing evidence. It is therefore not considered that an amendment to the place-making text is necessary.
-		Site Allocation 34: Stag Brewery, Lower Richmond Road, Mortlake		
648	Samantha Powell, Department for Education	Place-based Strategy for Mortlake and East Sheen - Site 34 Stag Brewery, Mortlake	<p>DfE support the site allocation for Stag Brewery site to facilitate delivery of a secondary school and meet clearly identified need for this provision. DfE Pupil Place Planning Team have confirmed that this area contains only three (Christ's, Grey Court and RPA) of the borough's 11 state-funded secondary schools and has experienced a sizeable demand for places for some years. Due to space and planning constraints at the three existing schools, this demand could not be addressed through permanent expansion of one or more of them. The projected shortfall of secondary places in 2025/26 in this area is at both phase and year of entry level, without even taking into account need that will arise from additional development being built locally. This area is one of the areas in London which does not have a large surplus of school places; in 2021 there were 112 unplaced Y7 pupils, with two of the three existing schools in the planning area operating bulge classes for three years until the new free school opens. Delivery of the secondary school on this site will therefore clearly help to address this identified need.</p>	Support for a new school noted. See also response to Comment 639. No amendments to text or Site Allocation required.
649	Richard Carr, Transport for London (TfL)	Site Allocation 34: Stag Brewery, Lower Richmond Road, Mortlake	<p>We note the statement that 'The Council will expect the developer to work together with relevant partners, including Transport for London, to ensure that where necessary improvements to sustainable modes of travel, including public transport facilities, are secured as part of any development proposal. The opportunity to relocate the bus stopping / turning facility from Avondale Road Bus station to this site should be investigated as part of the comprehensive redevelopment.' Although we support the requirement for bus standing space within the development site, TfL does not support the closure of Avondale Road Bus station. The proposed bus standing within the Stag Brewery site should be regarded as additional to, and independent of, the bus stops and turning facility at Avondale Road.</p>	The Council's adopted Stag Brewery Site supplementary planning brief informs the Site Allocation. This highlights the need to consider how the existing bus network can be enhanced, including the enhancement and diversion of service 209, which would require the current standing/turning facility at Avondale Road to be provided elsewhere on the site. It is noted that the diversion and extension of other bus services would also likely require such facilities. That said, Hammersmith Bridge has been closed to motorised traffic since the adoption of

				<p>the Brief as it was closed for repairs in 2020. This led to a postponement of TfL's comprehensive review of bus services in the wider Richmond and Hammersmith area. Until this matter is resolved, it is unlikely that TfL will be in a position to provide firm details of the future bus routes which would serve the local area. It is further noted that during the assessment of planning application ref. 18/0547/FUL, discussion with TfL led to a strengthening of route 419 being considered as the preferred option for the wider development, in addition to the new buses needed for the school. The strengthening of this service did not require the reprovision of the Avondale Road standing/turning facility. However, TfL requested that land be safeguarded to accommodate a bus turn facility for 3 buses should a future need arise. The applicant demonstrated as part of the planning application that there was space in the southwestern corner of the site should TfL and the Council ever decide to pursue this option at a later date. In light of the above, an amendment to the text to state 'if appropriate' has been added, in order to create greater flexibility with regards the requirement for reprovision of the Avondale Road stand. It is further noted that the current text does not advocate the closure of the bus station itself, thus there is sufficient flexibility in the wording for a design-led transport solution informed by liaison with TfL at full planning stage, when more details of the planning application and arising transport needs are known. No further amendments are necessary.</p>
650	Katie Parsons, Historic England	Site Allocation 34: Stag Brewery, Lower Richmond Road, Mortlake	<p>The heights for this site set out in Appendix 3 reflect those set out in the adopted site-specific SPD which have been generally accepted as appropriate. Links back to the Urban Design Study are helpful but the policy would be improved by drawing out some of the particular aspects of the site's significance are not just based on distance or visual impacts, and assessment requires a careful judgment based on site visits and the available evidence base</p> <p>An archaeological Desk Based Assessment will be required for this site as it is located within the Tier 2 Mortlake APA given the potential for Palaeoenvironmental/Prehistoric remains; a medieval church and cemetery; the Archbishop of Canterbury's Palace (potentially of national significance); a house associated with Thomas Cromwell (potentially of national significance); the historic development of the Stag Brewery whose origins may date back to the 15th-century. GLAAS should be consulted at an early stage to advise on place making and public benefit.</p>	<p>General support for the appropriateness of the heights as set in Appendix 3 and the site development brief, and reference to the Urban Design Study, are noted.</p> <p>The reformatted Site Allocations include a 'Context' section which sets out on-site and nearby heritage assets, relevant views, on-site and nearby designated open land and nature conservation constraints, protected trees, a description of the current site character and also a neighbour context description, as well as listing the Stag Brewery SPD, relevant Village Planning Guidance SPD and relevant Urban Design Study character area. The policy section of the Site Allocation requires any future development to respond positively to the Conservation Area and setting of Listed Buildings, and 'have regard to the design objectives and general guidance relating to the local character of the area set out in the relevant character area profiles and design guidance set out in the Urban Design Study and Village Planning Guidance'. The Council's Local Validations Checklist would also require the submission of a Design and Access Statement and Heritage Statement. It is considered that the current wording of the Site Allocation sufficiently sets out the Council's expectation that future development has regard to the site's significance and no further amendments to the text are required.</p> <p>Additional wording to the Urban Design Study to reference the potential archaeological significance of the site; however, it is not considered that amendments to the Site Allocation are required. The reformatted Site Allocations identifies where sites are located within an Archaeological Priority Zone, as is the Stag Brewery site. The Council's Validations Checklist requires the submission of an archaeological desk-based assessment for any future development and the Greater London Archaeological Advisory Service (GLAAS) would be a statutory consultee as part of the planning application process. It is therefore not considered that any further amendments to the text are required.</p>
651	Myrna Jelman	Site Allocation 34: Stag Brewery, Lower Richmond Road, Mortlake	<p>I urge you to not only protect the playing fields but also create a neighbourhood park/garden in that location, preferably with an indoor/outdoor cafe in the garden to add to the sense of the heart of the village/community. This will be the only opportunity to do this for decades to come</p>	<p>General support for protection of the playing fields noted. The Site Allocation makes clear that the provision of a new green space is required, and that retail and other commercial uses, such as cafes and restaurants, are supported. It is therefore not considered that amendment to the text are necessary.</p>
652	Tim Catchpole, Mortlake with East Sheen Society	Site Allocation 34: Stag Brewery, Lower Richmond Road, Mortlake	<p>We are pleased to see the reference to the Stag Brewery Planning Brief and the continuation of its 7- storey height limit which has been reinforced in your recent Urban Design Study.</p> <p>That said, we continue to disagree that "there is a clear need for a new 6-form of entry secondary school plus 6th form" replacing the primary school in the Brief, our reasons being as follows:</p> <ul style="list-style-type: none"> • There is no demand for the secondary school as primary school numbers have been in steady decline for the last ten years. • It will threaten the viability of the 6th forms at RPA and Christ's School; • It will deny the possibility of Thomson House Primary School relocating onto the Brewery site from its current two sites which are split by the railway, both sites lacking any open space and one of the sites being exposed to traffic intimidation in Sheen Lane next to the high-risk level crossing; • It will reduce the land requirement for housing and its affordable component (the primary school would have had a much smaller land requirement); 	<p>General support for mention of Stag Brewery SPD and 7-storey height limit noted.</p> <p>See response to Comment 639 regarding the need for a new school. With regards the suggestion that part of the Stag Brewery site should instead be used for re-location of Thomson House, this matter is addressed in the Council's School Place Planning Strategy March 2023. Thomson House is a primary free school which operates across two, spatially-challenged sites either side of the level crossing at Mortlake station. Were the secondary school proposal at Stag's Brewery site to be abandoned, it is unlikely that the DfE would use the capital budget for Livingstone Academy to pay for a relocation of Thomson House from their existing two sites onto the Stag Brewery Site. The capital budget has two elements: the cost of the</p>

			<ul style="list-style-type: none"> • It will require the existing playing fields to be all-weathered and equipped with unsightly fencing and floodlights (the primary school would have allowed retention of the existing grass playing fields); • It will generate large numbers of cyclists and pedestrians encountering problems at the level crossing on Sheen Lane and at the crossing of the heavily trafficked Lower Richmond Road. <p>We note the statement that “it may be acceptable to re-distribute the designated OOLTI within the site provided that the new open area is equivalent to or improved in terms of quantum, quality and openness.” We continue to maintain that the re-distributed OOLTI into a series of courtyards, which will be overshadowed and will likely become private open spaces in gated communities, represents a failure in terms of both quality and openness.</p> <p>Mention is made of the Archaeological Priority Area but this needs elaboration. The site includes the suspected remains of both the Archbishop’s Palace and Cromwell House.</p> <p>There is no mention of flood-risk and the need to install storm surge flood mitigation measures to ensure that surrounding areas of Mortlake are protected.</p> <p>Please note that our comments on Site Allocation 34 The Stag Brewery may – or may not – change in the course of the next few months when we come to comment on the forthcoming applications due for submission on 7 February. We aim to consult our wider membership on these applications and will revert to you in due course.</p>	<p>land, and the actual design and build budget. It is not considered that the DfE would commit millions of pounds to buy land at the brewery site to relocate a primary school on which they have already expended many millions of pounds (for new build and refurbishment of existing buildings at the Old Courthouse and former United Reformed Church sites). The DfE has also made it clear that they would not support a hybrid part-primary/part-secondary school on the site. Whilst it is recognised that Thomson House has not outside space at the former United Reformed Church site and limited outdoor space at the Old Courthouse, it is also noted that that situation has been exacerbated by the school unilaterally deciding in 2019, 2020 and 2021 to increase its intake in each year group. The financial challenges are also noted, namely that the developer would not only need to pay for the school build costs but also forgo a large capital receipt from the DfE for the footprint of the school site. This would invariably have implications for viability, impacting on affordable housing delivery unless density could be increased on site, which would unlikely be supported at full planning stage given the constraints and heritage considerations. Finally, with regards the suggestion that if Thomson House were to move to the Brewery site so that its two current sites could be repurposed to enable more secondary places, this option would not allow for the benefits of having an on-site sixth form, i.e. sixth form students could not act as role models for younger fellow pupils and teachers would unlikely have the time to travel the mile between the two sites between lessons, which also has transport implications. The need for a secondary school and sixth form on the Stag Brewery site is considered to be justified and sound, and no amendments to the Site Allocation are required.</p> <p>With regards the playing fields, the principle of a new secondary school, as opposed to relocation of an existing primary school, is already demonstrated, the justification for which is sound and justified. Reprovision/upgrading of the playing fields for sport uses can be assessed under Local Plan Policy 37. Public Open Space, Play, Sport and Recreation. Development would also need to have regard to Policy 36. Other Open Land of Townscape Importance. It is therefore not considered that any alterations to the Site Allocation are required.</p> <p>With regards to pedestrian and cyclist safety, the Site Allocation refers to the Stag Brewery development brief which ‘identifies a number of transportation and highway issues. The Site Allocation makes clear that the Council expects ‘the developer to work together with relevant partners, including TfL, to ensure that where necessary improvements to sustainable modes of travel, including public transport facilities, are secured as part of any development proposal’. The current wording of the Site Allocation therefore allows for highways safety to be considered in the design of any future planning application, noting too that the need for a new secondary school is considered to be justified and sound. Thus no amendments to the text are required.</p> <p>Regarding the OOLTI, this is a direct comment on a planning application and does not relate to the Site Allocation itself. The Site Allocation text is consistent with the requirements set out in Policy 36 and no amendments to the text are required.</p> <p>See response to Comment 650 regarding archaeology.</p> <p>The Site Allocations format has been amended to include a description of the site/wider area and relevant constraints, to include identification of the flooding constraints for each site. Flood risk / SuDS matters are covered in Policy 8. Flood Risk and Sustainable Drainage of this Plan, with which any future planning application would need to comply. No further amendments to the Site Allocation text are required.</p> <p>Comment regarding intention to consult membership and comment on upcoming planning application noted.</p>
653	David Abel	Site Allocation 34: Stag Brewery, Lower Richmond Road, Mortlake	<p>Redeveloping the site is a laudable and necessary aim. Providing a new heart for Mortlake is also laudable. Developing it to such an extent and such density is not however. I question the need to a school as do many others. I question the density of the</p>	<p>General support for redevelopment of the site and provision of a new heart for Mortlake is noted.</p>

			<p>buddings and the lack of definitive provision for affordable housing. I question to the lack of any form of industry on an ancient industrial site.</p> <p>Changes considered necessary: Reversion of heights of building to the original 2011 plan would go a long way to making these proposals desirable. Engagements with the Mortlake Brewery Community Group who actually live in the community that you're trying to provide a new heart for and who have a fairly detailed proposal would be better still.</p>	<p>See responses to Comments 639 and 652 regarding the need for a new secondary school on the site. No amendments to the Site Allocation are necessary.</p> <p>The Site Allocation is based on the adopted Stag Brewery planning brief SPD. This accepts the loss of the industrial use on the grounds that retention of the brewery use is not viable due to space constraints that limit the scope for consolidations of operations, noting the opportunity for redevelopment to provide a mix of uses, including employment generating uses, and opportunities for small businesses. The wording of the Site Allocation does not preclude an industrial use on the site as part of a mixed-use scheme. No amendments to the text are considered to be necessary.</p> <p>The Site Allocation does not mention density specifically though please see response to Comment 646 as well as response to Comment 639 regarding building heights. No amendments to the text are necessary.</p> <p>In accordance with the Statement of Community Involvement, the Council's engagement on the Local Plan seeks involvement of local groups and individuals. The Site Allocation does not preclude any group or developer from submitting a planning application for the site, subject to compliance with the general aspirations and appropriate land uses outlined in the Site Allocation. No amendments to the text are necessary on this basis.</p>
654	David Deaton	Site Allocation 34: Stag Brewery, Lower Richmond Road, Mortlake	<p>The need for the secondary school on this site is highly questionable, as the submission by the Mortlake Brewery Community Group demonstrates It would be better to relocate Thompson House School (a primary school with limited play area) to the brewery site and so ease congestion at the level crossing.</p>	<p>See responses to Comments 639 and 652 regarding the need for a new secondary school on the site, relocation of Thomson House School and transport matters. No amendments to the Site Allocation are necessary.</p>
655	Max Millington	Site Allocation 34: Stag Brewery, Lower Richmond Road, Mortlake	<ul style="list-style-type: none"> - Page 131/341 – Site allocation 34 – The reference to the requirement for a new secondary school, plus sixth form, is not supported by the evidence base without material forecasting uncertainties from a council that has consistently over-projected demand relative to what has in fact transpired – material question marks must accordingly be placed on the Council's forecasting methodology or application in the present case. The Mortlake Brewery Community Group has produced a detailed evidence base demonstrating that there is in fact NO requirement for places that cannot be discharged by temporarily expanding existing schools, which will be negatively impacted by any further provision of a large secondary school and sixth form. - Further, the impact of such a decision would be disproportionate taken in context of the other proposed uses references, not least in relation to traffic and emissions of noxious gases. To require the same would be inconsistent with many other policies. Delete reference to "The provision of an on-site new 6-form entry secondary school, plus sixth form, will be required." Or replace the references to secondary and sixth form with primary. - Furthermore (same reference) a primary school will be required to respond to anticipated local demographic change across the relevant period, primarily by reason of development of the Stag Brewery site, but also the development of the Barnes Hospital site and the Homebase scheme (all of which will have the impact of displacing existing catchment areas, and which have evolved since the present Local Plan). For instance, the Homebase scheme will fill Darell, while the Stag and Barnes Hospital schemes will fill Thomson House. Leaving other local neighbourhoods displaced from barely satisfactory existing catchments – e.g. Kingsway/Shalstone, Williams Lane, Wadham Mews and north Mortlake. - It is a legal obligation to provide sufficient primary school places – and the National Planning Policy Framework expressly references adequacy of primary school places locally, the reason being that young children simply cannot travel unaccompanied and can only travel for shorter distances. It is not, for instance, acceptable to require parents and pupils in Mortlake to travel to North Barnes at Lowther, a 4km round trip. - LBRuT to please make available the evidence base showing that these obligations will be discharged, including the basis of proposed residential tenure split at each new property (which, we anticipate, will primarily be 1BR and 2BR units housing more primary school age pupils than secondary). - Ideally planning for future primary school provision will involve moving Thomson House school (2FE) to the site, expanded by 1 FE if projections justify the same. This will have the added benefit of materially increasing pupil safety (in response to LBRuT's duty of care) as (i) the school's only existing recreation space is open to the public – moving the school to the playing fields would alleviate this and (ii) move the school away from the dangerous level crossing – barely a day goes by when there isn't a near miss, which LBRuT simply must acknowledge and mitigate. - Detailed context bullet points – bullet point 1 – "The Council has produced and adopted the Stag Brewery Planning Brief SPD in 2011 for this site, which sets out the vision for redevelopment and provides further guidance on the site's characteristics, constraints, land use and development opportunities. Any proposed development should have due regard to the adopted brief." To add the following text after brief, " , which was subsequently reaffirmed as the appropriate basis for development in the 2017 Local Plan". - Detailed context bullet points – bullet point 3 – "There is a need to create a new heart for Mortlake". Add in reference to new village heart for Mortlake per 2011 SPD. - Detailed context bullet points – bullet point 4 – "There is a clear need for a new 6-form of entry secondary school, plus a sixth form, in this area, as set out in the Council's School Place Planning Strategy. Therefore, the Council expects any redevelopment proposal to allow for the provision of this school." As per the detailed rationale set out above, to delete / qualify this accordingly 	<p>See responses to Comments 639 and 652 regarding the need for a new secondary school on the site. No amendments to the Site Allocation are necessary.</p> <p>With regards to air pollution, the Site Allocation makes clear that 'strict mitigation measures will be required, both to mitigate any effect on current receptors and highways and on future receptors within the proposed development, particularly for sensitive receptors, such as students at the secondary school'. No amendments are therefore required on this basis, noting that the need for a new secondary school on this site is justified and sound.</p> <p>The Council's revised School Place Planning Strategy March 2023 provides an update on the provision of new school places since December 2016, analyses demand for additional school places, considers how that demand could be met, and gives options where appropriate for securing local school provision. The Strategy notes that demand for Reception places has decreased since the peak of 2014, but that it is anticipated that a combination of changing migration patterns, the economic recession, and housing development (including at the Barnes Hospital site, which is identified in the Strategy and forms part of AfC's considerations , as well as other future likely developments in the area), will lead to further birth-rate increases in the borough in at least the short to medium term. Though the Strategy does also note that the uncertain economic and political situation in the UK (and beyond) makes pupil forecasting more difficult that it might otherwise be, and the assumptions made and conclusions drawn will need to be under constant review to ensure that a balance can be struck between having a sufficiency (though not a large surplus) of places to be able to manage a sudden increase in demand for state-funded places and ensuring that schools are as full as possible so as to maximise their per-pupil income. The Strategy notes that if the Stag Brewery housing development is approved and built, then the impact on demand for primary-phase places is expected to be felt in the eastern half of the borough within Areas 7 (Kew), 8 (East Sheen) and 9 (Barnes / Mortlake and Barnes Common) in the medium term. In the longer term, the likely redevelopment of Kew Retail Park site would add to the demand in Area 7, and the proposed Barnes Hospital site housing development would also add to demand in Area 9. To address this, the Strategy recommends that consideration be given to whether the temporary reduction of capacity in Area 7 should continue in the short to medium term, with the option also identified of re-establishing the shared form of entry between St Mary Magdalen's Primary, St Osmund's Primary and St Elizabeth's Primary in Area 6 (North Richmond / South</p>

		<p>to remove reference to need for a secondary school / sixth form and to reference the need for an expanded local primary school (including moving Thomson House to the site). The need is anything but clear.</p> <ul style="list-style-type: none"> - Further, in view of the negative impact of LBRuT's determination (however incorrect) that a secondary school is required, due assessment must be made of alternative sites for locating a secondary school. That should consider all material factors, including accessibility, impact on emissions, risk of places being lost to out-of-authority pupils – it is not appropriate to limit this assessment (as was previously the case based on materials provided by LBRuT) to ease of navigating planning restrictions – that is but one factor that can be navigated. Barn Elms would represent a significantly better location holistically than cramming a new secondary school into such a small site. 24.31 to be reworded accordingly. - Detailed context bullet points – bullet point 8 – “The provision of residential uses (including policy compliant affordable housing) will ensure that the new heart of Mortlake becomes a vibrant centre for new communities.”. To expressly provide for allocation of affordable housing of appropriate tenure mix spread across the site and avoiding a concentration of affordable housing in any one area (having regards to the existing local context). - Detailed context bullet points – bullet point 10 – AQFA – delete reference to ‘pupils at the secondary school’, as this unnecessarily limits the application of the provision. In particular, regard should be had to impact on Working Mums nursery adjacent to the site – my son picked up asthma whilst there almost certainly owing to the traffic on the Lower Richmond Road which it is imperative for public health does not become more congested/result in higher levels of emissions. I am far from persuaded by the Stage Brewery site applicant's EIA data and would call upon LBRuT to procure a second, independent traffic and emissions assessment in reliance on this provision (among other requirements). - Detailed context bullet points – bullet point 12 – “The playing fields in the south west corner of the site, which are designated Other Open Land of Townscape Importance (OOLTI), should be retained and/or reprovided and upgraded. In the event of re-provision and upgrading, where a comprehensive approach to redevelopment can be taken in line with Policy 36, it may be acceptable to re-distribute designated OOLTI within the site, provided that the new open area is equivalent or improved in terms of quantum, quality and openness. In addition, re-provision and upgrading of the playing fields within the site for sport uses has to be carried out in line with Policy 37, the NPPF and Sport England Policy”. The playing fields should be retained in line with existing OOLTI policy, as well as multiple provisions of the NPPF, with any re-provision scrutinised in line with policy allowing the same in truly limited circumstances, which have not been made out on the basis of the present development application. For the avoidance of doubt, roads, a school and a bus turnaround would not satisfy these requirements – and any area with a fence around it will cause the space to cease to be ‘open’. - Further, the reference to ‘within the site’ is not appropriate: the OOLTI designation is provided for the benefit of immediately local stakeholders, not for those up to a kilometer away elsewhere on the proposed site. This has not been adequately assessed to date in relation to existing applications. - Further, LBRuT / planning inspector to advance an application at the community's request for designation of the playing fields as Local Green Space – ideally at this juncture, but in any event if no successful planning application is brought forward within the next year. - Detailed context bullet points – bullet point 14 – “There is potential opportunity in the tall building zone (7 storeys), with a mid-rise zone buffer (5-6 storeys), in accordance with Policy 45 Tall and Mid-Rise Building Zones, although the Urban Design Study 2021 recognises the limits due to the sensitivities of the surrounding context.” Please be more specific as to which areas these are and add an express reference at the end as follows: “... and the requirements of the [2011 SPD] that taller buildings should be located at the centre of the site and the heights should decline towards the perimeter of the site” - Add bullet point referencing condition of adequate improvements being made to the dangerous level crossing in the vicinity to mitigate any potential aggravation otherwise flowing from the proposed development. These changes should be made in consultation with Network Rail and local stakeholders. - Ownership: is stated to be private. Please note there is a public footpath running to the north of the development site (east to west), which needs to be restored to the same having been fenced off. This has been reported to LBRuT on several occasions but has not yet been addressed. - Page 301/341 – 24.31 – in line with earlier comments, replace reference to Stag Brewery secondary school including sixth form with primary school. <p>Amendments, deletions and supplemental statements as stated above, for the reasons stated above.</p> <p>Please consider these comments alongside the detailed representations made (for myself and on behalf of the Williams Lane and Wadham Mews ad hoc residents group) in relation to the present 2017 Local Plan, as if set out in full (mutatis mutandis) in these representations.</p> <p>For context, I am a resident of Williams Lane, Mortlake (SW14) and live immediately adjacent to the site the subject of Site Allocation 34 (the Site). I have acted as the ‘Community Liaison Group’ (CLG) attendee advocating (on an ad hoc basis) the views of a group of Williams Lane & Wadham Mews residents (the Group) in relation to extant planning applications for the Site since 2017.</p> <p>As far as I am aware, this statement represents the general consensus of the Group's views on the Applications. However, this response is strictly supplemental to any individual responses the Group may wish to make and should be read accordingly. The Group moved into the 2011 Development upon construction in December 2011, following adoption by LBRuT of the 2011 SPB, which itself followed a site-specific consultation. The 2011 Development is shown in the SPB Scale and Uses Plan as the ‘Approved residential development’. The 2011 Development comprises some 17 houses and 64 flats, approximately 170 residents.</p>	<p>Richmond) as the simplest and most cost-efficient way of adding a form of entry should it be required. However, for Areas 8 and 9, the recommendation is that there is unlikely to be a need for any action to be taken in these areas. The Council has not identified a concern from its evidence base that it likely risks its obligations to provide primary school places; however, where there is a risk that this statutory duty is not met is for state-funded secondary school places, which is being imperilled by the ongoing uncertainty as to whether Livingstone Academy will be granted planning permission at the Stag Brewery site. Thus, no amendments to the Site Allocation are required.</p> <p>Remaining comments regarding primary school place planning are not considered to be a direct comment on the Site Allocation itself, other than the disagreement that the new secondary school is required. As noted above, the Council's Strategy 2023 provides an update on the provision of new school places since December 2016, analyses demand for additional school places, considers how that demand could be met, and gives options where appropriate for securing local school provision. The evidence base is considered to be sound and justified. It would not be appropriate to comment within the Site Allocation regarding more detailed comments raised with regards to plans/options for specific primary schools and instead the commenter is invited to refer to the Strategy. No amendments to the Site Allocation are required on this basis.</p> <p>With regards the comment that alternative sites be assessed for providing a new secondary school, no other sites have been identified as suitable within the whole eastern part of the borough. Objectors to the school have suggested part of Barn Elms as a possibility, however this is noted to have more planning constraints than the Stag Brewery site and planning permission being granted, or a suitable school being delivered, is unlikely. The DfE is entirely responsible for the site acquisition and design and build costs for Livingstone Academy, and like the Council, has not identified an alternative site which would be suitable. If the site were to be developed without a secondary school, the opportunity would be lost for good for a much-needed fourth school in the eastern half of the borough. With regards to consideration of emissions, this is a moot point as there is no alternative site identified with which to compare. The Site Allocation makes clear that ‘strict mitigation measures will be required, both to mitigate any effect on current receptors and highways and on future receptors within the proposed development, particularly for sensitive receptors, such as students at the secondary school’. No amendments are therefore required on this basis, noting that the need for a new secondary school on this site is justified and sound.</p> <p>When adopted, the draft Local Plan will replace the currently adopted Local Plan (2018). It is therefore not necessary to cite the Plan which will be superseded. No amendments to the text are required.</p> <p>With regards the reference to Mortlake village, see responses to Comments 639 and 646.</p> <p>Regarding the mention of affordable housing and tenure, this can be assessed under Local Plan Policy 11. Affordable Housing. It is not necessary to repeat this in the Site Allocation and no amendments are required.</p> <p>As stated above, the Site Allocation requires strict mitigation measures for air quality for existing and future receptors. This would apply to the nearby nursery. No amendments to the text are necessary. With regards the comment about the Environmental Impact Assessment, this is a comment on a planning application and is not a direct comment on the Site Allocation. There is no evidence to suggest that the EIA was flawed, and it was considered as part of the application accordingly. No amendments to the Site Allocation text are required on this basis.</p> <p>The comment on the OOLTI is a comment on a planning application. The Site Allocation already makes clear that assessment would be against Policy 37, the NPPF and Sport England Policy. No amendments to the text are required.</p>
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			<p>The Group requests that appropriate weight be given to the responses set out below as residents directly affected by the proposed development. We relied heavily upon LBRuT's then freshly-adopted APB in making an investment and life decision to move here 10 years ago, and which was substantially restated as the appropriate basis for development just 4 years ago in 2017. The proposed development, if insensitively pursued in line with the applicant's present proposals, in particular the secondary school, could blight the lives of the residents both during the construction phase and for many years to come, whilst depriving the existing community and future generations of key assets that make Mortlake a green, natural, predominantly sub-urban, village site.</p>	<p>There is no issue with the wording 'within the site' when referring to open land that is within the site. No amendments to the text are required. The remainder of the comment is a direct comment on a planning application and does not relate to the Site Allocation. No amendments are necessary.</p> <p>The Stag Brewery Playing Fields (Site 2) was excluded from Arup's Local Green Space Assessment, as part of the Open Land Review, due to its inclusion as a Site Allocation within the current Local Plan and being subject to two live planning applications. In the unlikely event that development does not come forward on this site, this could be revisited in a future assessment. However, as it stands, the site is identified for likely development, including for a much-needed secondary school. No amendments to the Site Allocation are necessary.</p> <p>See response to Comment 639 regarding the tall building zone and heat maps within the Urban Design Study. See response to Comment 650 regarding the site's significance. No further amendments to the text are required.</p> <p>The Site Allocation refers to the transport issues set out in the Stag Brewery planning brief, wherein the level crossing to the south is identified. Impacts on transport and pedestrian/highways safety arising from development can be assessed under Local Plan Policies 47. Sustainable Travel Choices and 48. Vehicular Parking Standards, Cycle Parking, Servicing and Construction Logistics Management. It is noted that the most recently decided planning application included mitigation and improvements to the crossing. It is thus considered that the Site Allocation as worded allows for this consideration and no amendments to the text are necessary.</p> <p>A towpath falls within the application site which is within the Port of London's ownership and forms part of the Thames Path National Trail and Definitive Public Footpath (PROW55). The Site Allocation has been amended to 'private (though includes a public towpath)'. The reformatted Site Allocations includes a section on the description of the site, and mention the towpath has been included in this. The Site Allocation requires development to have regard to the Stag Brewery planning brief, within which there is a reference to the towpath together with the requirement that pedestrian, and where possible cycling, routes should be created through any new development and existing pedestrian and cycling routes, which should be considered alongside other opportunities to enhance linkages with the surrounding area and increase permeability through the site. This is reinforced in the Site Allocation itself which identifies that: 'Links through the site, including a new green space and high-quality public realm link between the River Thames and Mortlake Green, provide the opportunity to integrate the development and new communities within the existing Mortlake community.' Enhancements, signage and way marking of such links can be assessed against Policy 47. As an interested party, the Thames Path National Trail Manager would be a consultee for any future planning application. With regards current accessibility to the towpath, this is a land ownership issue over and is not a matter for the current wording of the Site Allocation, other than the development requirement to ensure accessibility and enhancements. No further amendments to the current text are therefore required.</p> <p>Comments regarding the reach and consensus for the Mortlake Brewery Planning Group's comments are noted.</p> <p>Construction matters relating to a planning application can be assessed under Local Plan Policy 48 and therefore there is not a need to repeat matters pertaining to this in the Site Allocation. No amendments are necessary.</p>
656	David Wilson, Thames Water	The Stag Brewery Lower Richmond Road Mortlake London SW14 7ET	<p>Thames Water Site ID: 65562 (Approved 12/6/20, Reviewed Sep 21)</p> <p>Water Response</p> <p>The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are</p>	<p>The impact of development on water resources and infrastructure can be assessed as set out in Local Plan Policy 9. and it is therefore not considered necessary to refer to this in the Site Allocation. The updated Infrastructure Delivery Plan 2023 also identifies future infrastructure and service needs for the borough. No amendments to the place-making strategy or Site Allocation are necessary on this issue.</p>

			<p>delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development.</p> <p>Waste Response The scale of development/s is likely to require upgrades to the wastewater network. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan. The plan should determine the magnitude of spare capacity currently available within the network and what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development. On the information available to date we do not envisage concerns regarding wastewater treatment capacity in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ</p> <p>Additional Comments Regarding surface water discharge, we would expect this to be discharged directly to the River Thames due to its proximity in line with Sl.13 of the London Plan.</p>	
657	George Goodby, Environment Agency	Site Allocation 34: Stag Brewery, Mortlake and East Sheen	<p>This site is located within the fluvial / tidal Flood Zone 3 and is within close proximity to the statutory Thames Tidal flood defences. Therefore, planning applications must consider the TE2100 raising requirements in their design. We recognise that a recent planning application has been submitted but highlight that any future application must have a fixed flood defence line and remove any flood gates. We strongly recommend that a bullet point is added to promote a Riverside Strategy Approach to flood defence raisings and that clarifies the ambition to remove any active flood defences in preference for a fixed flood defence line.</p> <p>Recommended action: Add a bullet point to Site Allocation 34: Stag Brewery recommending a Riverside Strategy Approach to achieving the TE2100 Plan flood defence raisings and the ambition for a permanent fixed flood defence line.</p>	<p>The amended Site allocation format states the flood constraints for the site. Flood risk / SuDS matters are covered in Policy 8. Flood Risk and Sustainable Drainage of this Plan and any future application would be expected to comply with this policy, national policy and guidance and the Council's Strategic Flood Risk Assessment (SFRA) 2021. The current wording is therefore considered to be sufficient.</p> <p>It is not considered necessary to make specific reference to a Riverside Strategy Approach as the Site Allocation already makes clear that flood risk benefits, urban greening and public realm improvements are expected. No further amendments to the wording are required.</p>
658	Martin Ellis, South West London Clinical Commissioning Group (CCG)	Site Allocation 34: Stag Brewery, Lower Richmond Road, Mortlake	<p>The area contains Stag Brewery (Site Allocation 34) where there are current proposals to redevelop the site, including a significant number of new homes.</p> <p>The CCG has been engaged in the planning applications for the site, noting that a new application is likely to be submitted following the refusal by the Mayor of London at a representation hearing in July 2021.</p>	<p>Comments noted. No amendments to the Site Allocation text are suggested or required.</p>
-	Philip Briggs, Richmond Bat Species Action Plan Steering Group	Site Allocation 34: Stag Brewery, Lower Richmond Road, Mortlake	[See comment 915 in relation to biodiversity]	<p>The Site Allocation makes clear that development should regard for the Stag Brewery planning brief, the vision for which includes creation of a major new green space linking Mortlake Green to the River Thames and the riverside and ecological enhancement. The Site Allocation itself makes reference to a new green space and linkages between Mortlake Green and the Thames. The Site Allocations have been reformatted to include a 'Context' section within which on-site and nearby areas of designated open land and nature conservation are identified. Any future planning application would require the submission of a Preliminary Ecological Assessment which would also need to include Bat Survey. Ecological enhancements and mitigation can be assessed against Policies 38. Urban Greening, 39. Biodiversity and Geodiversity and 40. River and River Corridors in this Plan. There is therefore no requirement to repeat the requirements in the Site Allocation and no further amendments are required.</p>
-		Site Allocation 35: Mortlake and Barnes Delivery Office, Mortlake		
659	Ugne Staskauskaite, Cushman & Wakefield on behalf of Royal Mail Group	Site Allocation 35: Mortlake and Barnes Delivery Office, Mortlake	<p>On behalf of our client Royal Mail Group Limited ('Royal Mail'), Cushman and Wakefield have been instructed to submit a representation to the London Borough of Richmond Upon Thames Draft Local Plan: Pre- Publication Version (2021), in relation to Proposed Site Allocation 35: Mortlake and Barnes Delivery Office, Mortlake.</p> <p>Under section 35 of the Postal Services Act 2011, Royal Mail is the UK's designated Universal Postal Service Provider, supporting customers, businesses and communities across the country. This means it is the only company to have a statutory duty to collect and deliver letters six days a week at an affordable and geographically uniform price to every address in the UK. Royal Mail's services are regulated by Ofcom.</p> <p>The Act provides that Ofcom's primary regulatory duty is to secure the provision of the Universal Postal Service and includes a set of minimum standards for Universal Service Providers which Ofcom must secure. Ofcom discharges this duty by imposing regulatory conditions on Royal Mail, requiring it to provide the Universal Postal Service.</p> <p>Royal Mail is under some of the highest specification performance obligations for quality of service in Europe. Meeting Universal Service Provider obligations is in the public interest and this should not be affected detrimentally by any highways or development project.</p>	<p>The Site Allocation makes clear that development would be subject to the sorting and delivery office being surplus to requirements. Noting the general support from Royal Mail Group for designation as a Site Allocation should operational requirements change long term, the Site Allocation is to be retained despite there being no immediate plans to vacate the site at present.</p> <p>The site is located on a high street and within an Area of Mixed Use, though noting that AMUs are no longer going to be referenced in the updated Local Plan. It was decided to retain the site in the recently reviewed Article 4 designations and the site forms part of Site 48, which removes permitted development rights for change of use from Class E (commercial) to residential, thus demonstrating the importance of retaining the employment use on this site. The Article 4s were agreed with the Secretary of State and formally came into force July 2022. Local</p>

			<p><u>Mortlake and Barnes Delivery Office - Existing Use</u> Royal Mail currently occupies and are the freeholder of Mortlake and Barnes Delivery Office, Proposed Site Allocation 35. The Delivery Office accepts mail before sorting and distributing it within the local area. Vehicular access for Royal Mail vehicles (7.5-tonne delivery lorries and standard vans) is from Vineyard Path into a Delivery Office. The site is responsible for operational delivery vehicles, with members of staff employed at the site and responsible for the loading and unloading of mail. The site is operational 24 hours a day, 6 days a week, with the only non-operational hours being between 17.00 Saturday and 10.00 on Sunday. Throughout the day mail arrives and is unloaded and sorted in the service yard, and then reloaded onto delivery vehicles for their rounds.</p> <p><u>Representation</u> Cushman & Wakefield has reviewed the London Borough of Richmond on Thames Draft Local Plan: Pre-Publication Version in the context of its impact on the operations of the Royal Mail's properties within the borough. The delivery office is of strategic importance to Royal Mail in ensuring they are able to continue to fulfil their statutory duty for mail collection and delivery. The subject of this representation is to make the London Borough of Croydon aware of Royal Mail's operations within the borough. These representations made on behalf of Royal Mail are in reference to the Proposed Site Allocation 35: Mortlake and Barnes Delivery Office.</p> <p><u>Site-Specific Allocation</u> Royal Mail has reviewed their operational property requirements and confirmed Mortlake and Barnes Delivery Office is to remain in operation. The site is not currently available for development. Mortlake and Barnes Delivery Office falls under Site Allocation 35. The policy proposes that the site could be allocated for employment or other commercial and retail uses in this area if the site would become surplus. Only if the employment and other commercial or employment uses have been explored and options discounted in line with other policies in the Plan, would the provision of housing (including affordable housing) in upper floors as part of the mixed-use scheme be considered as a potential redevelopment option. Royal Mail is supportive of the proposed allocation of Site Allocation 35: Mortlake and Barnes Delivery Office for redevelopment, should Royal Mail operations at this site would cease or be relocated in the future. However, this should refer to mixed-use development to support the council in delivering other objectives of the Plan, including new homes. We request the wording of Site Allocation 35: Mortlake and Barnes Delivery Office is amended as following: Site Proposal: If the site is declared surplus to requirements, appropriate land uses including employment, commercial, retail and residential uses. Context: The site is located within the Mortlake Area of Mixed-Use. As of 2021, Royal Mail has no plans to relocate operations from this delivery office. However, if the site is declared surplus to requirements by Royal Mail in the longer term, the evidence suggests there is a need for employment or other commercial and retail uses in this area. Such provision should create an attractive frontage to the High Street. The provision of housing (including affordable housing) in upper floors as part of a mixed-use scheme should be considered as a potential redevelopment option. Design objectives and general guidance relating to the local character of the area, which any redevelopment proposal on this site should have regard to, is also set out in the Urban Design Study 2021 in the character area profile and design guidance for H1 Mortlake Riverside and the Mortlake Village Planning Guidance SPD.</p> <p><u>Summary</u> Royal Mail would welcome further engagement with the London Borough of Richmond of Thames in relation to the proposed allocation and availability of the site. Royal Mail supports a mixed-use allocation of the site on the basis set out above, only where the site becomes surplus, to fully contribute to the aims of the Plan, including new employment and housing provision.</p>	Plan Policy 17. Supporting Our Centres and Promoting Culture supports the diversification and repurposing of high streets and centres to contribute towards retail, leisure, business, educational, healthcare, community and cultural floorspace, and that residential use will be supported on upper floors and/or the rear, provided it does not compromise the ongoing use of existing commercial space. Local Plan Policy 21. Protecting the Local Economy states that the Council will support new development proposals which protect existing employment floorspace for office and industrial use, with a no net loss approach, including proposals which take an employment-led approach to any redevelopment to meet local economic needs through intensification of the existing employment floorspace. The Borough Employment Land & Premises Needs Assessment Study 2021 demonstrates that Richmond borough has been relatively resilient to the economic pressures of recent years; however, whilst employment capacity has improved in terms of jobs, there have been significant losses in employment land and premises despite strong restraint policies. The continued loss of office stock and industrial land from the borough at past rates is unsustainable. The policy approach in this Plan therefore provides stronger protection against the loss of existing office floorspace and industrial land, encourages its renewal and modernisation, and seeks additional provision, which is vital in terms of local economic and environmental sustainability objectives to create and maintain a sustainable economy. Thus, any future development would need to satisfy. Policy 21. i.e. explore the intensification of the existing employment use, before residential uses on the upper floors would be considered. However, that is not to say that an employment-led mixed-use scheme with residential would not be compatible with this policy requirement, provided the employment use is intensified. The Site Allocation wording has been amended to include a sentence which clarifies this. Further, reference to the AMU has been omitted and reference to the Article 4 Direction has been included. No further amendments are required.
660	Tim Catchpole, Mortlake with East Sheen Society	Site Allocation 35: Mortlake and Barnes Delivery Office, Mortlake	No comment.	Noted.
-		Site Allocation 36: Telephone Exchange and 172-176 Upper Richmond Road West, East Sheen		
661	Tim Catchpole, Mortlake with East Sheen Society	Site Allocation 36: Telephone Exchange and 172-176 Upper Richmond Road West, East Sheen	The guidance should note that planning permission has recently been granted for change of use from a retail warehouse to a gymnasium, now implemented. No further comment except to note that the rear end of the gymnasium site and the closed access to the site off Paynesfield Avenue continue to be derelict and unsightly.	<p>The Site Allocation already references the change of use to the gym. Further, the Site Allocations have been reformatted to include a 'Context' section which also includes relevant planning permissions. The change of use for a gym has been included in the site description and also in the planning permissions section.</p> <p>Any future planning application would be assessed against Local Plan Policy 28. Local Character and Design Quality which requires all development to be of high architectural and urban design quality, and Policy 44. Design Process which requires a design-led approach. There is therefore provision in the Local Plan to address the issue of the unsightly nature of the access road/site and no amendments to the Site Allocation text are required.</p>
-		Site Allocation 37: Barnes Hospital, East Sheen		
662	Samantha Powell, Department for Education	Place-based Strategy for Mortlake and East Sheen - Site 37 Barnes Hospital site, East Sheen	DfE support the site allocation for a SEND school on Barnes hospital site, East Sheen. The need for SEND school provision is generally rising across all LPAs; the SEND need in Richmond is clearly acknowledged and new provision appropriately promoted through this Local Plan site allocation. DfE's support for the project is evident through the approval of a SEND/AP Wave 2 Free School application in 2019 and funding in whole or part through the Council's Safety Valve Agreement with the Department, a	The Site Allocation requires the prioritisation of the provision of a Special Education Needs School, and also identifies social and community infrastructure uses as appropriate land uses. The extant outline permission is noted; however, the Site Allocation does not preclude an amended scheme from coming forward

			<p>condition of which is that the Council must expand specialist provision to avoid placements in non-maintained special schools and independent special schools.</p> <p>Although outline planning permission was granted in 2020, further feasibility undertaken since demonstrates that the site area for the school is significantly smaller than is usually required. As a result, efforts are being made between the parties to optimise the site area and provide much needed community services. The final site layout may therefore be different to that approved in outline.</p>	<p>provided the above land use principles are met. No amendments to the text are required.</p>
663	Martin Ellis, South West London Clinical Commissioning Group (CCG)	Site Allocation 37: Barnes Hospital, East Sheen	<p>We note the Site Allocation for Barnes Hospital (no 37) where outline planning permission was granted in 2020 for a mix of uses including a health centre, Special Education Needs (SEN) school and residential use. The Context text refers to the possibility of locating primary and/or community health services on this site should be investigated. The approved outline permission includes a new healthcare facility which will accommodate mental health outpatient services provided by South West London and St George's Mental Health NHS Trust. Whilst the proposed residential element will have an impact on primary healthcare services, there will not be the need to relocate primary health services onto the site.</p>	<p>The site is a former hospital and there is also an extant planning permission for a health centre. Local Plan Policy 49. Social and Community Infrastructure requires the retention and/or re-provision of these uses where existing. South West London and St George's Mental Health Trust, who retain ownership of part of the site, have been designing and consulting on a revised application which would continue to deliver a health centre (and school). This has been received by the Council and at the time of writing is awaiting validation. Whilst the comment regarding there not being the need to relocate primary health services onto the site is noted, it is assumed that this is in the context of the potential additional health infrastructure needs arising from the residential element of the outline development scheme. However, the Council is confident of the Trust's requirement for a health centre and so it is not necessary to amend the reference to primary health services in the Site Allocation text.</p>
664	Tim Catchpole, Mortlake with East Sheen Society	Site Allocation 37: Barnes Hospital, East Sheen	<p>There is no clear guidance about the height and density of the housing development and what can be accepted in relation to the poor access from South Worple Way. Planning permission has since been granted in outline for 83 housing units which we believe to be the absolute maximum. Any increase in this quantum, as currently proposed, should not be considered.</p>	<p>The site has not been identified in the Urban Design Study as a Tall or Mid-Rise Building Zone. Where sites are outside of these zones, the Site Allocations generally do not give prescriptive minimum or maximum heights, beyond guidance that future development will need to take account of the surrounding context, nearby heritage assets and other constraints such as designated open land. The Site Allocation for this site makes clear that any proposal should respond positively to the adjoining Queens Road Conservation Area and the relationship with Mortlake cemetery, and have regard to the design objectives and general guidance set out in the relevant character areas profiles and design guidance in the Urban Design Study and Village Planning Guidance, which provide a detailed analysis of the prevailing characteristics of the local area. Any future planning application would also need to comply with Local Plan Policies 28. Local Character and Design Quality and 44. Design Process. Similarly, the Site Allocations are not intended to be prescriptive with regards to specific density or minimum/maximum housing numbers, noting that there is no longer a density matrix maximum range in the London Plan 2021, in order to enable account to be taken of other factors relevant to optimising the potential of a site, such as local context, design, viability and transport capacity. The number of units deemed acceptable would rely on a range of factors, such as tenure type, as well as design and transport. Transport matters can be assessed under Policies 47. Sustainable Travel Choices and 48. Vehicular Parking Standards, Cycle Parking, Servicing and Construction Logistics Management, which would also allow for the assessment of suitability of access. It is noted that the outline permission for the site proposed amending the existing access via South Worple Way. The scope of the Site Allocation is high level and it would not be appropriate to specify at this stage the specifics of an access point, noting that this would depend on the nature and design of the development and its layout. No amendments to the Site Allocation are considered to be necessary on these points.</p>
665	Anna Russell-Smith, Montagu Evans on behalf of South West London and St George's Mental Health NHS Trust	Site Allocation 37: Barnes Hospital, East Sheen	<p>Background</p> <p>Before setting out our comments on the above matters, we set out a brief overview of the South West London and St Georges Mental Health NHS Trust (SWLSTG), in particular in relation to Barnes Hospital, South Worple Way, London, SW14 8SU, which falls within the administrative area of Richmond upon Thames.</p> <p>The Trust was established in December 1994 and provides local mental health services to approximately 1.2 million people in South West London. The Trust have embarked upon a much needed programme for the modernisation of mental health facilities serving south west London of which Barnes Hospital, which falls within the LB Richmond, forms part of.</p> <p>Outline planning permission was achieved at Barnes Hospital on the 14 September 2020 for:</p> <p><i>"Outline planning permission for the demolition and comprehensive redevelopment (phased development) of land at Barnes Hospital to provide a mixed use development comprising a health centre (Use Class D1), a Special Educational Needs (SEN) School (Use Class D1), up to 83 new build residential units (Use Class C3), the conversion of two of the retained BTMs for use for up to 3 no. residential units (Use Class C3), the conversion of one BTM for medical use (Use Class D1), car parking, landscaping and associated works. All matters reserved save for the full details submitted in relation to access points at the site boundaries".</i></p> <p>Subsequent to achieving outline planning permission the Trust have disposed of part of the Site to LS Estates to deliver the 83 residential units (which includes for up to 3 residential units in the conversion of the retained BTMs).</p>	<p>General support for the Site Allocation noted.</p> <p>Local Plan Policy 49. Social and Community Infrastructure, to which the Site Allocation makes reference, sets out the Council's approach to sites where proposals involve the loss of social infrastructure. Sections D & E relate to the acceptability of other land uses where the loss of the social and community infrastructure has been justified. In such cases the policy supports change of use to other employment generating uses. Furthermore, schemes for 100% affordable housing (meeting the requirements of Policy 11) will not be required to demonstrate that the site cannot be re-used or re-developed for a social infrastructure use, nor supply marketing evidence, thus sites in this instance would not need to be redeveloped for an employment generating use. It is considered that there is sufficient flexibility in the policy for change of use and to facilitate the best use of land whilst ensuring that the need for social infrastructure is met in line with this Local Plan Policy 49 and London Plan Policy S1. It is therefore considered that the policy wording of Policy S1 do not need to</p>

		<p>LS Estates have proceeded with an amendment application (under application reference: 21/3107/FUL) which seeks approval for the following: <i>“Drop-in full application to supersede the residential development zone of previously approved outline planning permission 18/3642/OUT. Demolition of existing structures and redevelopment of site including construction of three new buildings comprising 106 residential units of mixed tenure (Use Class C3), alterations and conversion of two existing buildings for 3 residential units (Use Class C3), car and cycle parking, landscaping and associated works”</i> This application is still awaiting determination by the LB Richmond.</p> <p>National Planning Policy Context In preparing these representations significant weight has been given to national planning policy set by the National Planning Policy Framework (NPPF) (July 2021). Paragraph 9 of the 2021 NPPF requires sustainable development objectives to be delivered through the preparation and implementation of plans. Paragraph 11 of the NPPF requires that during the plan-making process, plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change. Part b of paragraph 11 requires that strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses. Section 3 of the NPPF deals with plan-making specifically and identifies under Paragraph 15 that the planning system should be genuinely plan-led. Paragraph 16 requires plans to achieve the following: a) be prepared with the objective of contributing to the achievement of sustainable development; b) be prepared positively, in a way that is aspirational but deliverable; c) be shaped by early, proportionate and effective, engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees; d) contain policies that are clearly written and unambiguous, so it is evidence how a decision maker should react to development proposals; and e) be accessible through the use of digital tools to assist public involvement and policy presentation. With regard to Strategic Policies, Paragraph 20 of the NPPF states that Strategic Policies should set an overall strategy for the pattern, scale and quality of development and make sufficient provision for housing, employment, retail, leisure and other commercial development, infrastructure for transport, community facilities and the conservation and enhancement of natural, built and historic environment. Paragraph 23 goes on to identify Strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period, in line with the presumption in favour of sustainable development. This should include planning for and allocating sufficient sites to deliver the strategic priorities of the area (except insofar as these needs can be demonstrated to be met more appropriately through other mechanisms, such as brownfield registers or non-strategic policies). Turning to producing new Local Plans specifically, Paragraph 31 states that the preparation and review of all policies should be underpinned by relevant and up-to-date evidence. Local Plans should be informed throughout their preparation by a sustainability appraisal that meets the relevant legal requirement (Paragraph 32).</p> <p>The London Plan Consideration has also been given in the preparation of these representations to the new London Plan (2021) The new London Plan places emphasis on the need to build strong and inclusive communities (Policy GG1), making the best use of land (Policy GG2), creating a healthy city (Policy GG3), delivering the homes Londoners need (Policy GG4) and growing a good economy (Policy GG5). The following sections respond to specific policies outlined within the London Borough of Richmond upon Thames (LBR) draft pre-publication Local Plan.</p> <p>[See comment 647, 747, 761 and 1083]</p> <p>Site Allocation 37 (Barnes Hospital) Barnes Hospital is allocated under Site Allocation 37, which in principle is supported. The site has outline planning permission (ref: 18/3642/OUT) for new healthcare facility, a new SEN school and 83 residential dwellings. The Trust and LocatED are currently progressing further feasibility studies to ensure site opportunities are maximised for both a Health Centre and a SEN School. London plan Policy S1 part F states: <i>“development proposals that would result in a loss of social infrastructure in an areas of defined need should be refused unless: 2. The loss is part of a wider public service transformation plan which requires investment in modern, fit for purpose infrastructure and facilities in order to meet future population needs or to sustain and improve services”.</i> In addition paragraph 5.2.9 states that: <i>“development and regeneration proposal for an area provide an opportunity to re-think how land and buildings are used and where there is a more optimal configuration or use of that land. Hospital reconfigurations are an example where more intensive and better use of a site can lead to a combination of improved facilities and the creation and release of surplus land for other priorities..”.</i> The opportunity to deliver both a Health Centre and a SEN school is supported to respond to the need and demand within the Local Area Strategy. The Trust support the opportunity of alternative uses, such as housing, being considered as a potential redevelopment option on the basis that community and social infrastructure have been explored. However the policy should</p>	<p>be repeated in the Site Allocation and thus no amendments to the text are required.</p>
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			<p>reflect London Plan Policy S1 regarding loss being part of a wider transformation plan seeking to invest in modern, fit for purpose infrastructure and facilities.</p> <p>Closing We trust that these observations are useful at this consultation stage. We wish to maintain an active role in the engagement process moving forward and look forward to receiving an update as LB Richmond upon Thames proceed forward with their emerging Local Plan.</p>	
666	George Goodby, Environment Agency	Site Allocation 37: Barnes Hospital, Mortlake and East Sheen	<p>This site is currently located within Flood Zone 1. However, we are due to review our Beverley Brook flood modelling in the future which could potentially result in a higher flood risk designation on this site. This could impact any sequential testing of the site in the future.</p> <p>We note that Site Allocation 36: Telephone Exchange and 172-176 Upper Richmond Road West, East Sheen is also within the Beverley Brook catchment. However, no flood risk designation changes are expected for this site.</p> <p>Recommended action: No current action required from the LPA.</p>	<p>Comments noted. A sentence has been added to the 'Flood Risk' section of the reformatted Site Allocation 'Context' section, to highlight the EA's intended flood risk review, noting that no changes to the flood risk for this site have been indicated or confirmed at this time. Whilst the Environment Agency has not confirmed any changes to the flood risk designation at present, were that to change prior to publication of the new Local Plan, the Site Allocation could be amended accordingly.</p>
667	David Wilson, Thames Water	Barnes Hospital, South Worple Way, London, SW14 8SU	<p>Thames Water Site ID: 24141 (Allocated site pending, Reviewed 10/12/21)</p> <p>Water Response On the information available to date we do not envisage infrastructure concerns regarding water supply network infrastructure in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ</p> <p>Waste Response On the information available to date we do not envisage concerns regarding wastewater treatment capacity in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ</p> <p>Additional Comments With regard to SURFACE WATER drainage, Thames Water would advise that if the developer follows the sequential approach to the disposal of surface water we would have no objection. Management of surface water from new developments should follow Policy SI 13 Sustainable drainage of the London Plan 2021. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. Should you require further information please refer to our website. https://developers.thameswater.co.uk/Developing-a-large-site/Apply-and-pay-for-services/Wastewater-services. Thames Water would recommend that petrol / oil interceptors be fitted in all car parking/washing/repair facilities. Failure to enforce the effective use of petrol / oil interceptors could result in oil-polluted discharges entering local watercourses. We would expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer. Groundwater discharges typically result from construction site dewatering, deep excavations, basement infiltration, borehole installation, testing and site remediation. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. Should the Local Planning Authority be minded to approve the planning application, Thames Water would like the following informative attached to the planning permission: "A Trade Effluent Consent from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a Consent is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Consent enquiries should be directed to Thames Water's Trade Effluent Team by telephoning 020 3577 9200 or by emailing trade.effluent@thameswater.co.uk .</p>	<p>The impact of development on water resources and infrastructure can be assessed as set out in Local Plan Policy 9. Water Resources and Infrastructure and it is therefore not considered necessary to refer to this in the Site Allocation. The updated Infrastructure Delivery Plan 2023 also identifies future infrastructure and service needs for the borough. The Site Allocations format has been amended to include a description of the site/wider area and relevant constraints, to include identification of the flooding constraints for each site. Flood risk / SuDS matters are covered in Policy 8 'Flood Risk and Sustainable Drainage' of this Plan, with which any future planning application would need to comply. The inclusion of informatives would be relevant to any future decision notice and it would not be appropriate to include this in the Site Allocation. Thames Water would be a statutory consultee for any future planning application and would have the opportunity at that stage to recommend informatives. It is therefore not considered necessary to set out the requirements of developers for this in the Site Allocations. No amendments to the Site Allocation text are necessary on this issue.</p>
-		Place-based Strategy for Barnes		
668	Emma Robinson, Barnes Community Association		<p>On the specific points in the Place-based strategy for Barnes (14) we make the following comments – Strengthen the role and function of the area's distinctive Barnes local centre and encourage independent shops, and support the neighbourhood centre of Castelnau to ensure day-to-day facilities are accessible, in accordance with Policy 1 Living Locally. We support this ambition with a particular focus on the Castelnau shopping parade. We applied to the Community Fund in 2020 for a grant to improve the area and were unsuccessful for a number of reasons. Obstacles to improvement in the area have so far been unsurmountable so we would welcome the Council's support to implement positive changes to uplift the neighbourhood and to improve the vibrancy of the shopping parade. Enable future pedestrianisation of A3003 in Barnes centre to make the area more permeable and reduce the prominence of traffic. This will present an opportunity to create public realm for dwelling as opposed to the existing, narrow and transient pavements along Barnes High Street.</p>	<p>Note support for a number of aspects of the place-based strategy.</p> <p>The purpose of the place-based strategies in the Local Plan is to articulate how the over-arching vision and spatial strategy translate into particular places across the borough, picking up the variations between areas and a locally-specific vision, to inform how future development may be expected to contribute to the wider aims. Specific references to localities and projects are used for illustration, however the Local Plan covers a 15 year period and its remit is to shape developments and guide decisions. Some of the specifics referred to may be short-term projects, that may not require planning permission or be linked to new development, and will be subject to funding from a variety of sources. The Council's Finance, Policy and</p>

			<p>We fully support this sentiment and, following the successful application to the Community Fund in 2019, we have been working with Council Officers to implement a scheme to deliver improvements to Barnes High Street. This scheme aims to reduce the dominance of traffic in the area and is an opportunity to deliver improvements to the public realm with wider pavements, re-allocation of parking bays to reduce traffic congestion and a new east-bound bus stop.</p> <p>We have long had an ambition to see the closure of Barnes High Street on key dates in the Barnes calendar. With the temporary diversion of buses down Nassau Road now possible, we would welcome the opportunity to work with the Council on a full road closure on event days.</p> <p>Consider opportunities to improve connectivity including the High Street to Barnes Green and to the Riverside and Thames Path route. The desire to improve connectivity between Barnes Green and the river, the green and the blue, was a key theme of the Big Barnes Ponder of 2013 when residents came together to describe their vision for the future of Barnes. The aim was to draw people from the Green, down the High Street to the river.</p> <p>A key feature of our discussion at the Ponder was the fact that Barnes is a village on the river, and as such this should be the focus of our community, and yet it is impossible to get onto the water and very difficult to see it as the view is obstructed by an unattractive, concrete flood defence. An ambition of the Ponder was to remove a section of concrete flood defence at the end of the High Street and to replace it with glass so that the eye is drawn down the High Street to a view of the water. This is an entirely achievable ambition and with the Council's support we could start a conversation with the Environment Agency and make it a reality.</p> <p>Improve the public realm to enhance the sense of arrival at Barnes Station, and reanimate streets as a local hub for shops, cafés, and small businesses, including around Priest's Bridge.</p> <p>We identified the need to improve the sense of arrival at Barnes Station several years ago and applied for a Civic Pride grant for wayfinding maps in the area. Clearly more investment is needed to achieve our aim and we have been working with Friends of Barnes Common to ensure that the passage between the station and the village is as safe as possible. We have also had discussions with Council Officers about ensuring a safer crossing both at Station Road and at Mill Hill for pedestrians walking from the station to the village. We would welcome some support from the Council with this work.</p> <p>We have also been in discussion with Council officers about the need to review parking arrangements on Station Road which must be one of very few streets in the borough that are close to a station where you can park without restriction. This will help to prioritise local residents over out of borough commuters and eliminate the common occurrence of long-term parking of abandoned cars along this stretch.</p> <p>We agree that there is a need to improve the shopping area at Priest's Bridge and improvements are also needed to support the businesses in White Hart Lane. We have been working with Council officers on a new parking scheme for the area which should enable businesses to attract customers from further afield. White Hart Lane is a destination shopping area with a number of businesses that necessitate customer parking for between 1 and 2 hours yet the area has very little parking within restricted hours.</p> <p>The Castelnau shopping parade needs support with reanimation. We have been trying to support local businesses with public realm improvements but have had little success (see above).</p> <p>Consider opportunities to enhance Barnes Riverside, preserving views along the Thames, and to maintain a sense of activity and vibrancy, with potential for temporary pedestrianisation of The Terrace to create café/restaurant seating or more width to improve pedestrian experience, reduce the perceived dominance of vehicles and better connect the townscape with the Dock Gardens and Thames Path.</p> <p>An ambition of the Big Barnes Ponder was to open up Barnes Riverside to water sports and recreational activities fitting to a village sited on a river frontage. This year we will be embarking on a project to enhance the area around Small Profits Dock and to encourage the use of the dock for water sports such as paddle boarding and rowing. We have already been in discussion with the PLA about the possibility of creating a river pool at the dock area, as this stretch of river is used in the summer months by a river swimming group. The PLA is receptive to a buoyed area for swimming and we will be pursuing this as part of our ideas for regeneration of the area. We would very much like the support and assistance of the Council with this project.</p> <p>Clearly to make this project a success we will need infrastructure and we have had positive conversations with Barnes Sports Club about the use of their facilities. We would like to see amenities such as a temporary coffee pop-up with outside seating for water sports users and for walkers along the towpath which is busy particularly at weekends.</p> <p>There is also an urgent need to resurface some sections of the Barnes towpath. In particular the stretches from Small Profit Dock to Ferry Lane and between Queen Elizabeth Walk and Beverly Brook need attention. Both stretches of towpath are busy with recreational walkers as well as commuters and school children.</p> <p>The Council will support through partnership working proposals to investigate the feasibility to restore a green walkway along Barnes Bridge with step-free access at Barnes Bridge station.</p> <p>We welcome the Council's support for project which will see a redundant Thames crossing restored to community use and will result in a major attraction for the borough, not just for Barnes. We look forward to working together to make this project a reality.</p>	<p>Resources Committee on 26 September 2022 approved additional allocation to the Public Realm Improvement Fund, including for schemes in Barnes High Street and North Barnes.</p> <p>Add general reference in the place-based strategy to the opportunities for improving wayfinding from the station, and for opening up the riverside for sport and recreational activities.</p>
669	Jamie Stewart-Liddon	Barnes section	<p>Station Road, SW13 – From the junction with Vine Road to Barnes Railway Station</p> <p>It was suggested by Emma Robinson, Barnes Community Association, that I contact one of Barnes' ward councillors to comment on the above.</p> <p>I am sure you know the above approach to Barnes Railway Station and, when cars are parked there, how difficult is to pass if one meets a car coming the other way (possibly it should be made into a one way system). However, what I question is why on earth Barnes residents are providing free, unlimited parking to all and sundry. Barnes permit holders perhaps, but drivers from elsewhere – definitely not.</p>	<p>Note the issue around uncontrolled parking, although this is not related to new development and beyond the remit of the Local Plan. Other policies in the Local Plan do encourage active travel and seek to reduce the dominance of vehicles. The specific comment relating to parking in Station Road has been shared with officers working on highways schemes.</p>

			We are all being encouraged to use public transport and without sufficient passengers SW trains would not be able to sustainably run their services. By providing all day free parking, non-Barnes residents are clearly driving in, parking and then jumping on the train for the last leg of their journey. I don't think this is right. I believe it would perhaps best if this stretch of Station Road be made no parking, or at least pay and display, to prevent this happening. I hope this something the council might consider introducing.	
670	George Goodby, Environment Agency	Place-based Strategy for Barnes	Pedestrianisation of 'The Terrace' must not over sail or impede the Environment Agency's ability to inspect any tidal flood defence element. There should be no encroachment or overhanging of the River Thames. The last bullet point under the policy section should be amended to reflect this, if the terraces it refers to are adjacent to the River Thames. Recommended action: Clarify within the final context bullet point that The Terrace should not result in any encroachment on the River Thames, should not impede the Environment Agency's ability to inspect any tidal flood defences, and should not impede any future raising requirements.	Noted. Add a cross-reference to Policy 8 in respect of the tidal flood defences and to ensure any proposals do not encroach on the river.
671	William Mortimer	14 Place-based Strategy for Barnes	The traffic planning for Barnes is based on an assumption that motor vehicle journeys will fall by 5% withing five years. It is to be hoped so otherwise the polluting air round the river end of the High Street will continue. Barnes residents still using the Kew dump have ridiculous levels of delay despite the short distance and a congested A3003 simply negates the good work being done to provide better quality air via the open spaces on the Commons. The Barnes Plan also refers to a Garden Bridge on the redundant third span of the railway bridge. This particularly reflects the lack of audit between the Local Plan and the Disaster management plan for the Borough. This span could be used for storing materials required when road and rail services have been seriously damaged and the river's priority function will be to bring in men and materials to cope with evacuation of people and repair of dwellings. The idea of a garden has been dreamed up by people with little vision of the environmental future of the planet or the benefits to the community of a garden in the sky. Who will be paying for bridge maintenance and the gardening effort? Let's get real, we are facing a climate emergency, we line on a flight path to Heathrow and the world is at the mercy of terrorist activity possibly including 'dirty bombs'. These considerations must come before a garden.	Generally there has been a notable decline in motor traffic, since the peak of total vehicle mileage on the Borough's roads in 1999. The long term LIP target is for 75% of journeys to be made by sustainable modes by 2041. Policy 47. Sustainable travel choices provides the details around how the Council will work with others to reduce traffic congestion and air pollution. The Partnership promoting the proposed green walkway along the disused railway bridge have now appointed consultants to progress the project, including costing, and set up a website www.theviewatbarnesbridge.org/ This is mentioned as another policy initiative which the Council supports as an aspiration, and therefore amends to the Plan are not considered necessary.
672	Unity Harvey	Place-based Strategy for Barnes	[Comments also raised about local issues in response to big problems and I wondered whether you might know any way in which the Local Plan may help] Public wellbeing a. Transport With others I have been trying for 18 months or more to get <i>Transport for London to divert the 378 along Church Road and Rocks Lane via the Red Lion junction instead of Station Road and Mill Hill</i> . This would help hundreds if not thousands more people of all ages, especially now when Hammersmith Bridge is closed because it goes directly to the underground system at Putney Bridge Station. Not only would it help the local residents particularly old people saving energy and time, hundreds of cars pollute the atmosphere because there is no good bus service to the Enable Sports Centre from Fulham, Wandsworth or Wimbledon. The car owners do not stop in Barnes. Church Road businesses and the LWC would benefit from the route change. TfL would collect many more fares. Our MP and Councillors have been trying to help so far to no avail. All the policies would support this route change. <i>Is there any way the policies could be given more power in such an instance?</i> b. Road Safety I have been trying since the summer in 2020 to have <i>the private road belonging to Wandsworth Council outside Nos. 5 & 7 Queen Elizabeth Walk restored to its original width so that two cars can pass. It lies in the Borough of Richmond and is blocked by a very high and wide beech hedge overgrown by about a metre into the road</i> . There is no footpath and it is used by thousands of people of all ages and vehicles of every description and size to enter and leave the Enable Sports Centre. It is the only entrance and exit apart from a pedestrian one to the towpath. Sometimes the road becomes blocked so that an ambulance could not get through and should there be a flood, exit from the sports centre would be more than difficult. The houses have concealed drives. <i>No department in Wandsworth appears willing to take responsibility even for sweeping this part of the road. Please could there be a policy which would ensure an owner take action where public safety is concerned in a case like this?</i>	Note the issues around transport and road safety, although as acknowledged this is not related to new development and beyond the remit of the Local Plan. The specific comments have been shared with transport officers.
-	Heather Mathew, Richmond Council for Voluntary Service (CVS)	Place-based Strategy for Barnes	[See comment 282 in relation to the place-based strategy for Barnes]	See response to 282 in relation to area profiles and community mapping. Add reference to community isolation and deprivation in the vision for the place-based strategy.
-		Policies		
673	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	General - Policies	Section 15 in the un-headed list of contents – titled 'Policies' - doesn't contain anything other than one photograph. Instead, the polices are set out in Sections 4 and 16 to 26 inclusive. Needs remedying.	-
674	Peter Willan and Paul Velluet, Old Deer Park Working Group	General - Policies	Section 15 in the un-headed list of contents – titled 'Policies' - doesn't contain anything other than one photograph. Instead, the polices are set out in Sections 4 and 16 to 26 inclusive. Needs remedying.	-
-		Responding to the climate emergency and taking action		
675	Clare Snowdon	16 Responding to the climate emergency and taking action	16. I wholeheartedly support putting climate change at the heart of decision making. It is good to see firm levels to minimise emissions. Possibly I would prefer stronger requirements around the circular economy - moving towards having organisations adopt doughnut economics or similar decision-making processes. I worry about the policy in practice and whether it is sufficiently robust, having seen policies such as biodiversity net gain in practice.	Support noted. Organisational and financial restructuring that would be required as part of a Doughnut Economics approach is out with the remit of the Local Plan. The Council consider the policies to be demanding but fair.
676	Juliet Ames-Lewis, The Richmond Charities	Policies 3 & 4 in Climate Change Section	Policy 3 - Tackling the climate emergency and Policy 4 - Minimising greenhouse gas emissions and promoting energy efficiency. The Richmond Charities almshouses are, in the main, listed buildings in conservation areas. Fuel poverty is a key issue for our	Comments noted. The Publication Version of the Local Plan includes new supporting text following Policy 4. Minimising Greenhouse gas emissions and

			elderly residents of limited means and the charity undertook a large scale energy audit in 2019 which identified the installation of photovoltaic panels as the most appropriate renewable energy source for the almshouses, in order to pass the benefits of cheaper electricity directly to our residents. However, the Council has refused permission for the charity to install photovoltaic panels on the majority of its almshouse estates. There are huge barriers for organisations and housing providers to 'go green'. If the aim as stated in Policy 3 is for all buildings to be net-zero carbon by 2050, then planning policy needs to change to enable renewable energy sources to be installed on listed buildings and in conservation areas. There is a balance between climate change and heritage assets but if the Council has declared a 'climate emergency', then the balance has to shift towards the environment and away from the heritage assets. The Richmond Charities will always have a duty of care to its listed buildings, but it also has a duty of care to its residents to ensure that they are not in fuel poverty. There needs to be help for home owners and housing providers in terms of removing barriers for planning permission for renewable energy sources.	promoting energy efficiency which sets out how development of sustainable energy infrastructure would be considered in conservation areas. There are certain requirements and regulations with regards Permitted Development which the Council must meet which in particular set certain standards for the use of solar PV in conservation areas.
677	Melanie Gurney, The Planning Lab, on behalf of the Royal Botanic Gardens	Policies 3-7	RBGK welcome policies 3-7 that seek to address the climate emergency, minimise greenhouse gas emissions, and promote energy efficiency. This largely aligns with RBGK's own sustainability initiatives and commitments. However, RBGK seek a number of clarifications and have some observations. RBGK adheres to its own rigorous sustainability targets, which mark a step change to tackle the climate and biodiversity crisis by reducing our carbon footprint, with the overarching aim of becoming 'Climate Positive' by 2030. This involves an extensive range of site wide initiatives that RBGK hope will introduce very significant benefits and a permanent change to its operations. These initiatives will not always be delivered alongside other developments; they may be stand-alone projects. Alternatively, measures implemented they may bridge several projects. Therefore, due to the nature of how projects are carried out across the 330-acre site, the related benefits may not be captured as part of individual planning application submissions, which would still be required to be justified in line with LBRuT policies. This means that it will not always be feasible for net zero carbon to be achieved or demonstrated for individual developments. RBGK, therefore, suggest that in cases such as ours where there is a Council endorsed and/or recognised strategic plan in place, some degree of flexibility is allowed to take into consideration the wider picture; as well as the additional potential complexities associated with retrofitting sensitive heritage assets (e.g. where securing efficiencies may be a more prudent approach), as recognised in Part F of Policy 29.	Comments noted. The Climate Change policies are considered to be demanding but fair and will help the borough achieve its carbon reduction goals. Individual planning applications will be considered on a case by case basis and no additional flexibility is required to be added.
678	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	Climate Change Emergency.	We welcome the increased emphasis given to climate change and pollution.	Support noted.
679	Peter Willan and Paul Velluet, Old Deer Park Working Group	Climate Change Emergency.	We welcome the increased emphasis given to climate change and pollution.	Support noted.
680	Katie Parsons, Historic England	Responding to the climate change emergency and taking action	Historic England recognises the urgent need for positive action to tackle climate change and is committed to achieving net zero. To meet the government's target of being carbon neutral by 2050, we must recycle, reuse and responsibly adapt our historic buildings. Optimising embodied carbon by the reuse, maintenance, and retrofit of existing buildings is essential, as is avoiding maladaptation which can cause increased emissions, inefficiencies contributing to fuel poverty, and risk public health. We are pleased that this is recognised in policies 28 and 29. It would be helpful if the plan provided further detail on how climate change measures can be applied to historic buildings to ensure well informed retrofits that genuinely reduce carbon emissions. For example, encourage applicants to use a fabric first approach, and to demonstrate that they understand the building and where the inefficiencies lie so that the most effective measures can be installed. We are happy to provide further guidance as needed. At Historic England, we are researching and promoting the role our cultural heritage can play in both climate change mitigation and adaptation for example looking at recycling and reusing existing historic buildings . Historic England's Heritage Counts: Carbon in the Historic Environment research shows that sympathetically upgrading and reusing existing buildings, rather than demolishing and building new can reduce carbon. Historic England's 2020 Heritage Counts research Know Your Home, Know Your Carbon: Reducing Carbon Emissions in Traditional Homes highlights the difference repair and maintenance can make, the power of small behaviour changes and the need for careful planning when thinking about retrofits and renovations. Understanding Carbon in the Historic Environment is a report which builds on our 2019 Heritage Counts research, utilising modelled life cycle assessments and real-world data to estimate the whole life carbon emissions associated with the refurbishment and retrofit of different domestic homes. These are compared against a modelled scenario of demolishing existing homes and replacing them with new buildings. The 2020 Addendum to the initial research includes three new case studies. Locally based solutions, that are informed by local hazards and conditions, will be needed. This includes considering building materials and potential local energy/ heating options. Energy-generation switching will be the largest achievement in the pursuit of net zero and this will depend on local solutions such as heat networks, geothermal, wind, solar etc. (rather than looking at this on a property by property basis the benefits of approaching this on an area by area basis may produce better efficiencies. Historic England has produced a number of other resources aimed at providing practical advice on saving energy in homes which you may also find helpful for your evidence base. We welcome a set strategic of policies aimed at addressing climate change. We support the emphasis upon the circular economy and reuse which reflects the London Plan's guidance and will retention of historic buildings, as well as existing materials. It would be helpful if the plan made reference to the risks posed by maladaptation which jeopardises not only historic buildings but can frustrate the ability of proposals to genuinely reduce carbon. A focus on areabased solutions might also be helpful, alongside planning for retrofit on a building by building basis. For example, can options to explore alternative energy sources for groups of buildings be pursued e.g. shared ground source heat pumps.	Comments noted. Policy 6. Sustainable construction standards sets out the Council's requirements for fabric first efficiency. Additionally new supporting text following Policy 4. Minimising Greenhouse gas emissions and promoting energy efficiency which sets out how development of sustainable energy infrastructure would be considered in conservation areas.

681	Joan Gibson	Page 144 (definitions)	For low carbon energy - need to band biomass boilers - should only be electric or heat source. Page 144.	Comment noted. Policy 4. Minimising Greenhouse gas emissions and promoting energy efficiency sets out that in developments where one or more home is created there can be no gas boilers in new dwellings or new non-domestic development in Richmond from 2024. This is considered demanding but fair and any additional changes have not been tested in the Net Zero Climate Change Study or the Whole Plan Viability Assessment and would be not be suitable for inclusion at this time.
682	Vicky Phillips, Habitats & Heritage	Climate Emergency	We strongly support the approach outlined in Policy 3 and subsidiary policies 4-9.	Support noted.
-	George Goodby, Environment Agency	Sustainability Appraisal and Sequential Test Report	[See comment 224 on the Sustainability Appraisal in relation to climate change, flood risk, green and blue infrastructure]	Comment noted.
Policy 3.Tackling the climate emergency (Strategic Policy)				
683	Tim Catchpole, Mortlake with East Sheen Society	Policy 3.Tackling the climate emergency (Strategic Policy)	Mention could be made of developing plans for centrally sponsored decentralised energy networks (DENs) using ground source or borehole source heat exchangers from under sports pitches and similar open spaces. Item B7 could include minimising run-off and promoting soakaways, also aquifer use.	The Council's requirements for Decentralised Energy Networks are captured in Policy 5 Energy Infrastructure (Strategic Policy). It is not considered they need to be repeated here. The Council's requirements for sustainable drainage are captured in more detail in Policy 8 Flood Risk and Sustainable Drainage.
684	Vicky Phillips, Habitats & Heritage	Policy 3.Tackling the climate emergency (Strategic Policy)	Policy 3 A – We think it will be necessary to move towards net-zero carbon developments much more quickly than by 2050. Planning control over new development is one of the main levers the local authority has to reduce CO2 from buildings. The Local Plan Strategic vision of “a net zero borough by 2050” (p14) will require some sectors of activity to reach net zero much more quickly to compensate for those areas where the Council has less control e.g. the state of the existing housing and commercial building stock which is responsible for almost three quarters of the Borough’s CO2 emissions. Policy 3B para 11 and Policy 3D, also para 16.6 – We are pleased that the need to increase the energy efficiency of the existing building stock is acknowledged. In our work on our energy efficiency project SWLEAP we see many homes that are extremely energy inefficient, damp, mouldy and cold causing health problems to their occupiers. Existing programmes such as the Green Homes grants (25 properties to date) reach only a tiny proportion of these properties. The Carbon Offset Fund is welcome but is very small in financial terms and currently makes no contribution to any retrofitting other than at Council premises. Housing association blocks owned by RHP are often in need of complete refurbishment to bring them up to modern standards. We would like to see a fuller discussion of whether the Council considers it can do anything to advance this policy using planning powers and what national changes are needed to promote such action. This might include allowing solar panels to be fitted with no planning consent unless on a listed building and ensuring when refurbishment involving any planning consent is carried out the Council can mandate fitting air source heat pumps, extra insulation, triple glazing etc.	Comment noted, amend Policy 3.A as follows: ““The Council will promote zero carbon development, with the aim that all buildings and infrastructure projects in the borough will be net-zero carbon by <u>2043, at the latest</u> ”. The Council considers the policy to be ambitious and helps address the action needed to tackle the impacts of climate change. Solar panels are already captured in Permitted Development right unless they are subject to Article 4 Directions or within a Conservation Area. References to specific technologies are captured in para 16.13 of the draft Local Plan. A report to the Council’s Environment, Sustainability, Culture and Sports Committee on 6 September 2022 considered energy efficiency within the historic environment and included recommendations for producing additional planning guidance such as an update in the Solar Together guidance. The Local Plan has set out requirements for developments involving refurbishment in Policy 4 Minimising Greenhouse gas emissions and promoting energy efficiency (Strategic Policy). It is not considered they need to be repeated here.
685	George Goodby, Environment Agency	Policy 3 ‘Tackling the climate emergency (Strategic Policy)	We recommend that Policy 3 Part B adds ‘ <i>maintaining flood storage and increasing it where possible</i> ’ to the numbered list. As mentioned previously, managing flood risk should be a key part of Richmond’s strategy for tackling the climate emergency. Protecting existing flood storage will ensure the issue isn’t exacerbated and seeking additional storage will help provide betterment and reduce flood risk in the borough. Recently, we have spent considerable time influencing development management applications where applicants try to demonstrate that a small loss of storage on their site is not a detriment to flood risk. We have highlighted that even small losses in storage can cumulatively have a large impact on flood risk. By specifically mentioning storage we believe this will help us persuade developers more easily on the importance of ensuring that there is no loss of flood storage because of their development, therefore bringing their proposals in line with the NPPF Paragraph 159 which requires ‘no increase in flood risk elsewhere’. This could be added to Part B7 where it could read ‘ <i>adopt an integrated approach to water management which considers flood risk and flood storage, sustainable drainage, water efficiency, water quality and biodiversity</i> ’. Recommended action: We recommend that you add ‘maintaining flood storage and increasing it where possible’ to Policy 3 Part B7.	Comment noted. It is agreed that the policy could be amended as the Environment Agency have suggested. Amend Policy 3.B.7 as follows: 1. adopt an integrated approach to water management which considers flood risk <u>and flood storage</u> , sustainable drainage, water efficiency, water quality and biodiversity;
686	George Goodby, Environment Agency	Policy 3 - Tackling the climate emergency (Strategic Policy)	The climate emergency and biodiversity crisis are intrinsically linked; climate change is one of the main drivers for biodiversity loss, and the destruction of ecosystems undermines nature’s ability to regulate greenhouse gas. However, biodiversity is only mentioned once in this policy. We would recommend that the link between the biodiversity and climate crises is expanded upon. This is also an appropriate place in the plan to link to the net gain policy set out in Policy 39: Biodiversity and Geodiversity .	Comment noted. The Local Plan is to be read as a whole and Policy 39 Biodiversity and Geodiversity is considered sufficient along with the existing reference in Policy 3 to the importance of biodiversity in tackling climate change. Richmond Council have declared a climate emergency and intend to address the effects of climate change through a variety of methods.
687	Martin Ellis, South West London Clinical Commissioning Group (CCG)	Policy 3.Tackling the climate emergency (Strategic Policy)	We support the policy. The NHS is committed to reaching net zero carbon by 2040 for the emissions it controls. The report ‘Delivering a Net Zero National Health Service’ (October 2020) sets out interventions which will help the NHS decarbonise, including action to reduce emissions from the NHS estate, a move towards a sustainable model of healthcare with care closer to home, promoting less polluting travel options and preventing ill health which reduces hospital admissions. To support the net	Comment noted.

			zero ambition, each NHS trust and integrated care system will have a Green Plan which sets out their aims, objectives, and delivery plans for carbon reduction.	
-		Policy 4. Minimising Greenhouse gas emissions and promoting energy efficiency (Strategic Policy)		
688	Neil Henderson, Gerald Eve on behalf of Reselton Properties	Policy 4 Minimising Greenhouse gas emissions and promoting energy efficiency	Policy 4, Table 16.1 - Reselton fully support measures to minimise greenhouse gases and promote energy efficiency. However, collectively with the Mayors carbon off set payment, the proposed carbon offset of £300/t would equate to a payment nearly 4 times the current value. While technology is still evolving to meet these ambitious environmental targets, the carbon offset payment is more likely to be required initially. With such a high tariff increase, this may render many schemes unviable, particularly where there is an ambition to meet other priorities such as affordable housing. It is therefore suggested that, where it can be demonstrated that a payment in lieu is required, there should be discretion in the policy to allow this payment to be directed to other priorities in the Development Plan where it is considered appropriate to do so.	<p>Comments noted. Addressing the impacts of climate change through the development of more efficient and sustainable homes is a key priority for the Council. To support these ambitious policies the Council has prepared a Net Zero Carbon Study, which has assessed the deliverability and feasibility of these policy requirements and found that the minimum on site carbon reductions and carbon offsetting requirements are achievable. The requirements have also been tested as part of the Whole Plan Viability Assessment, which overall show development to be viable.</p> <p>Payments in lieu with regard to carbon offsetting will be used to implement projects to reduce carbon emissions across the borough as established in Policy 3 Tackling the Climate Emergency (Strategic Policy) Part D.</p>
689	Tim Catchpole, Mortlake with East Sheen Society	Policy 4. Minimising Greenhouse gas emissions and promoting energy efficiency (Strategic Policy)	Item B2 could include DENs using heat from ground source and borehole source heat exchangers.	The Council's requirements for Decentralised Energy Networks are captured in Policy 5 Energy Infrastructure (Strategic Policy). It is not considered they need to be repeated here.
690	James Stevens, Home Builders Federation (HBF)	Policy 4. Minimising Greenhouse gas emissions and promoting energy efficiency (Strategic Policy)	<p>Part A requires that all developments, including minor developments, are zero carbon. The London Plan stipulates that only major developments achieve this standard. This is because the Mayor of London needs to encourage the much greater supply of housing from small sites in order to achieve the housing requirement overall for London. The London Plan has made this a strategic priority. The Council justifies its departure from the position in the London Plan on the basis that cumulatively, small developments would amount to a large development within the borough (para. 16.12). This is a specious argument. Cumulatively, the small sites target contained in the London Plan, would also could amount to large development (12,000 homes per year on small sites compared to 40,000 per year on large sites) yet the Mayor of London has acknowledged the importance of encouraging small site delivery and wishes to support this more, hence the exemption for minor development. Richmond Council has a very small housing target relative to other London boroughs - a target of only 411 homes a year. It is the second lowest, after the City of London. A small part of Richmond's housing supply in the next decade could come forward in the form of minor developments – that is developments of nine or fewer dwellings. Conversely, it has a very large and aging housing stock, which is highly energy inefficient, but also protected by conservation areas (they cover some two thirds of the borough). This historic environment protection prevents the gradual replacement of these leaky homes. The contribution to carbon emissions, therefore, from new homes built on small sites compared to the existing housing stock is negligible. This is doubly the case when new homes on minor developments will have to be built to the higher energy efficiency requirements of the new Part L of the Building Regulations (a 30% improvement on current Part L, moving toward zero carbon by 2030) that comes into force from June this year.</p> <p>We consider the Council's approach is disproportionate when balanced against other policy priorities such as encouraging housing supply on small sites. As paragraph 4.2.1 of the London Plan states <i>For London to deliver more of the housing it needs, small sites (below 0.25 hectares in size) must make a substantially greater contribution to new supply across the city. Therefore, increasing the rate of housing delivery from small sites is a strategic priority. Achieving this objective will require positive and proactive planning by boroughs both in terms of planning decisions and plan-making.</i> (Emphasis retained from the London Plan).</p> <p>In line with the London Plan, the Council needs to encourage a far higher supply of housing on small sites. The London Plan has calculated that some 57% of its overall supply is expected to come forward on small sites of 0.25 hectares in size, although we recognise that some of this anticipated supply will be on sites greater than 10 or more dwellings. Nevertheless, the Mayor wishes to increase the rate of small site delivery and for permissions to be given faster through various policy interventions. This is a strategic priority for the London Plan. Requiring minor developments to be zero carbon from the date of the adoption of the local plan would militate against this strategic priority.</p>	<p>Paragraph 16.12 explains that the cumulative CO2 impact from every small site development in Richmond would be large.</p> <p>The existing housing stock does contribute to a significant amount of carbon released into the atmosphere and the Council aims to reduce that through a number of initiatives such as the Solar Together scheme. Notwithstanding the ageing stock and the Council's efforts to tackle this, it is important that new development does not further exacerbate the problem. Therefore, it is of utmost importance to ensure that new development is fit for purpose and reduces carbon dioxide emissions as much as possible, with the aim of achieving zero carbon homes.</p> <p>Addressing the impacts of climate change through the development of more efficient and sustainable homes is a key priority for the Council. To support these ambitious policies the Council has prepared a Net Zero Carbon Study, which has assessed the deliverability and feasibility of these policy requirements and found that the minimum on site carbon reductions and carbon offsetting requirements are achievable, including for small sites. The requirements have also been tested as part of the Whole Plan Viability Assessment, which overall show development to be viable.</p> <p>The Council intends to meet the London Plan Strategic Goals of increasing the delivery of homes from small sites and of tackling climate change together. It has been shown that small sites can come forward in Richmond with a higher minimum on-site carbon reduction than is set out in the London Plan – the requirements for small sites are already more onerous in the existing adopted Local Plan (2018). This will ensure that new housing stock is as close to zero carbon as possible and reduces the risk of needing retrofitting prior to 2043.</p>
691	Melanie Gurney, The Planning Lab, on behalf of the Royal Botanic Gardens	Policies 4, 5 and 6	<p>Aside from this [See comment 677 in relation to Policy 3-7], clarification is sought as to whether the requirements set out in policies 4 and 5 which refer to "non-residential development of over 500sqm" includes conversions and refurbishments (including for listed buildings), or whether this is only applicable to new build floorspace. Similarly, clarification is sought as to whether the requirements set out in policy 6 for "development of 100sqm or more of non-residential floorspace" includes conversions and refurbishments, or whether this relates to new build floorspace only. RBGK's view is that these policies may generally be more applicable and deliverable in relation to new build development.</p> <p>Part (E) of Policy 4 encourages development proposals to achieve zero-carbon on-site insofar as possible, rather than relying on offset payments to make up any shortfall in emissions. The policy recognises that, where cash-in-lieu contributions are acceptable, this will be offset at a rate of £300/t as of 2021, and this will be regularly reviewed. RBGK note that the policy wording stipulates a blanket rate and does not provide any flexibility or exemption for charities and cultural institutions. Given that RBGK applies its own rigorous site-wide sustainability targets, and this is not always able to be reflected in individual planning applications (as noted above), RBGK requests that this is considered in future draft policy.</p>	<p>Comments noted. Clarifications have been added to the policy as suggested. Additionally, it should be noted that in Policy 6.A.5 the requirement has been increased from 100sqm to 500sqm.</p> <p>Amend Policy 4.D to clarify that 500sqm commercial includes changes of use, conversions and major refurbishments.</p> <p>Amend Policy 5.C to clarify that 500sqm commercial includes changes of use, conversions and major refurbishments.</p> <p>Amend Policy 6.A.5 to clarify that 500sqm commercial includes changes of use, conversions and extensions.</p>

			RBGK also highlight that there is a slight conflict in Policy 4. Part D requires non-residential development of 500sqm or more to achieve net-zero carbon with a minimum of 60% on-site reduction. However, Table 16.1 specifies that non-residential development of 500sqm or more should achieve net-zero with a minimum of 50% on-site reduction. RBGK seek clarification in the on-site reduction figure.	Amend Policy 4 table 16.1 to clarify that on site-reductions are 60% and off setting is 40% In general, Local Plan policies apply to all relevant developments, irrespective of ownership. Therefore, Policy 4 does not include flexibility in relation to charitable and cultural institutions; however, part E.1 does set out that 'off-site provision instead of a cash-in-lieu contribution is only acceptable if an alternative proposal is identified, delivery of that proposal is certain and subject to agreement by the Council', which is considered sufficiently flexible for circumstances such as those described by the respondent.
692	Nina Miles, GLA on behalf of Mayor of London	Climate Change and Policy 4. Minimising Greenhouse gas emissions and promoting energy efficiency (Strategic Policy)	The Mayor welcomes the elevation of the importance of tackling climate change across the borough within Richmond's Plan. The Mayor has set an ambitious aim for London to be a zero carbon city by 2030 and you may want to reflect this in the strategic climate emergency policy. With regards to the ambitious targets in set out in Policy 4 that seek a higher level of on-site reduction in carbon (60%) and a higher offset rate of £300/t compared with Policy SI 2 LP2021, it will be important to ensure that these are deliverable and that housing targets and other requirements of the plan can still be achieved. Policy DF1 LP2021 applies priority to affordable housing and necessary public transport improvements when setting policies seeking planning obligations in Local Plans. Policy 4 should be reviewed once the Whole Plan Viability evidence, has been produced. . For clarity, the supporting text to Policy 4 in paragraph 16.8 should read 'at least five years' rather than 'over a period of 4 years' as per the Mayor's BeSeen energy monitoring guidance.	Comments noted. Addressing the impacts of climate change through the development of more efficient and sustainable homes is a key priority for the Council. To support these ambitious policies the Council has prepared a Net Zero Carbon Study, which has assessed the deliverability and feasibility of these policy requirements and found that the minimum on site carbon reductions and carbon offsetting requirements are achievable, including for small sites. The requirements have also been tested as part of the Whole Plan Viability Assessment, which overall show development to be viable. Amend paragraph 16.8 as follows: (over a period of 4 years <i>at least five years</i>)
693	Charlotte Orrell, DP9 Ltd on behalf of London Square Developments	Policy 4 - Minimising greenhouse gas emissions and promoting energy efficiency	We welcome the Council's aspirations to achieve a borough target of net-zero carbon by 2050 and we support the requirement for proposed development to demonstrate a contribution to minimise greenhouse gas emissions on development sites. We do however query the need to meet burdensome policy requirements over and above London Plan policy without evidence-based justification. In particular, draft Policy 4 seeks to achieve a minimum of a 60% on-site carbon reduction for any new build residential development, major development of 10 or more dwellings and non-residential development of 500sqm or more. This is considerably higher than London Plan (2021) Policy SI 2 requirements, which requires a minimum of 35% and is regarded as unreasonable. It is not clear from supporting text or evidence-based information as to why the target has been set at a level significantly higher than that within the London Plan (2021) nor has there been a review as to the realities of sites being able to deliver this target. The government plans to bring in a more gradual approach (as per the Future Homes Standard (2021)) to increasing savings by way of an interim Part L in 2022, which is of similar level to the London Plan (2021) 35% minimum target. This gradual approach is more sensitive to the abilities of the industry to adapt and deliver these increasingly demanding targets and is based upon detailed studies and extensive consultation. The Council's 60% target therefore does not align with the Future Homes Standard approach and is not justified by the relevant studies. Draft Policy 4 highlights that the London Plan carbon offset price is currently set at £95/t. The Council note that this is generally considered too low to actually deliver equivalent carbon savings and therefore does not incentivise sufficient on-site savings. The Council note that in order to incentivise developers to implement on-site lower carbon strategies where possible, and to ensure that any remaining carbon shortfall can adequately be addressed off site, the carbon shortfall for the assumed life of a development will therefore be offset at a rate of £300/t. The Council have provided no evidence-based reasoning as to how they have arrived at this conclusion nor the appropriateness of the proposed figure. A significant increase in carbon offset price will fail to encourage on-site reductions and simply be prohibitive to the redevelopment of sites as a whole, including the delivery of on-site affordable housing. London Plan (2021) guidance notes that the price for offsetting carbon and suggested carbon offset price will be updated in future guidance by the Greater London Authority (GLA). It is therefore also queried whether the Council have liaised with the GLA regarding the updated figure to ensure alignment. The London Plan (2021) has provided gas emission and energy targets which do not jeopardise the strategic aims for London including housing delivery. In its current form the burdensome nature of these policies without justification would significantly affect the deliverability of residential schemes, including the viability of small housing sites, thereby impeding the council from meeting borough housing targets and the deliverability of affordable homes.	Addressing the impacts of climate change through the development of more efficient and sustainable homes is a key priority for the Council. To support these ambitious policies the Council has prepared a Net Zero Carbon Study, which has assessed the deliverability and feasibility of these policy requirements and found that the minimum on site carbon reductions and carbon offsetting requirements are achievable, including for small sites. The requirements have also been tested as part of the Whole Plan Viability Assessment, which overall show development to be viable.
694	Martin Ellis, South West London Clinical Commissioning Group (CCG)	Policy 4. Minimising Greenhouse gas emissions and promoting energy efficiency (Strategic Policy)	We support the policy. It is recognised that delivering a net zero health service will require work to ensure new healthcare buildings are net zero compatible, as well as improvements to the existing estate. We note that London Plan Policy SI2 requires major development to be net zero carbon which now applies to residential development and non-residential development. It should be noted that for the redevelopment of NHS sites this requirement can add significant costs. New health estate projects and major refurbishment projects are assessed by the BREEAM rating system. We note that London Plan paragraph 9.2.7 helpfully states that the BREEAM system can be used to can help demonstrate that energy efficiency targets have been met and Boroughs are encouraged to include BREEAM targets in their Local Plans.	Comment noted. The Richmond Local Plan includes BREEAM targets in Policy 6. Sustainable construction standards.
695	Nick Alston, Avison Young on behalf of St George Plc and Marks & Spencer	Policy 4 Minimising Greenhouse Gas Emissions and Promoting Energy Efficiency	Policy 4, as currently drafted, is not in accordance with national policy, not in general conformity with the London Plan, nor justified. We recommend that it is amended to fully conform with the London Plan which would make it sound, as explained below: Explanation	Addressing the impacts of climate change through the development of more efficient and sustainable homes is a key priority for the Council. To support these ambitious policies the Council has prepared a Net Zero Carbon Study, which has assessed the deliverability and feasibility of these policy requirements and found that the minimum on site carbon reductions and carbon offsetting requirements

			<p>London Plan Policy SI 2 'Minimising greenhouse gas emissions' sets a carbon cash-in-lieu payment of £95/t, which is based on a nationally recognised non-traded price, that has been tested as part of the viability assessment for the London Plan which boroughs may use to collect offset payments.</p> <p>The Greater London Authority guidance for London's Local Planning Authorities on establishing carbon offset funds (October 2018) requires that "LPAs should develop and publish a price for offsetting carbon based on either: a nationally recognised carbon pricing mechanism; or the cost of offsetting carbon emissions across the LPA. The price set should not put an unreasonable burden on development and must enable schemes to remain viable."</p> <p>The London Plan carbon offset price of £95 per tonne has been tested as part of the viability assessment (of the London Plan). This is intended to be the price LPAs adopt. Where following a 'cost of offsetting' route, the LPA should include an assessment of the carbon offsetting measures that are possible in the LPA, and dividing the average cost per tonne per year of these measures by the expected shortfall in emissions from the anticipated development coming forward over the next 30 years. An evidence base for the £300/t figure has not been provided (an 'Evidence Base for Carbon Emissions Reduction Policies' was provided in 2008).</p> <p>Based on recent referable developments, carbon offset payments at the London Plan 2021 rate (£95/t) equates to an average offset payment of c. £20/sqm. With the proposed £300/t rate this would equate to c. £65/sqm. As a worked example, on a development of 20,000 sqm it is estimated that this would be an additional £1million which will greatly affect a development's viability.</p> <p>Policy 4 is based on a baseline of Approved Document Part L 2013 emissions, which will become superseded by National Policy changes to Approved Document Part L 2021, that addresses carbon emissions via a 31% betterment over Part L 2013 (domestic), and Approved Document Part L 2025 under the Future Homes Standard which will go even further to deliver an estimated 75% betterment over Part L 2013 (domestic). This will effectively surpass the proposed target of 60% for major developments, but allows for a gradual transitional period for the Construction Industry to adjust. Furthermore, the GLA are due to release a revised Energy Assessment Guidance (2022) to compliment the newly published Approved Document Part L 2021, which will address the improved carbon reduction target and how this should be assessed on schemes within London going forward.</p> <p>National Planning Policy and London Plan both encourage maximising renewable provision, including solar PV, but do not set specific targets, as they recognise site and roof space constraints. By adhering to a robust review process in planning, this allows greater design flexibility than setting rigid targets.</p> <p>Recommended Amendments</p> <p>In lieu of an appropriate evidence base for the £300/t offset figure, it is recommended that the GLA viability tested £95/t figure be kept, in accordance with the London Plan 2021.</p> <p>With the continual carbon reduction targets being imposed under the Future Homes Standard (31% under ADL 2021, and 75% under ADL 2025), and the anticipated update to the GLA Energy Assessment Guidance (2022), it is recommended that the Policy targets be amended to track London Plan 2021 targets, which shall develop in-sync with the Future Homes/Buildings Standard. It is recommended that mandatory solar technologies target of 40% of the building footprint area be dropped, and the guidance in the London Plan 2021 and the anticipated Energy Assessment Guidance (2022) be adopted.</p>	<p>are achievable, including for small sites. The requirements have also been tested as part of the Whole Plan Viability Assessment, which overall show development to be viable.</p> <p>The 40% solar technologies target is only to assess the viability of such a proposal and is not a mandatory requirement for all schemes. Where it can be shown that it is viable it would be expected to be brought forward as part of the development.</p>
-		Policy 5. Energy Infrastructure (Strategic Policy)		
696	Tim Catchpole, Mortlake with East Sheen Society	Policy 5. Energy Infrastructure (Strategic Policy)	Item B could be modified by adding after "Where networks do not exist, developments should make provision to connect to any future network" the following: "and contribute significantly to its inception within 5 years or by 2030."	Comment noted. This requirement is not evidence based and would not be enforceable. However, it is considered that the existing wording will achieve the same ambitions.
-	Melanie Gurney, The Planning Lab, on behalf of the Royal Botanic Gardens	Policy 5	[See comment 691 regarding the non-residential threshold]	<p>Comments noted. Clarifications have been added to the policy as suggested. Additionally, it should be noted that in Policy 6.A.5 the requirement has been increased from 100sqm to 500sqm.</p> <p>Amend Policy 4.D to clarify that 500sqm commercial includes changes of use, conversions and major refurbishments.</p> <p>Amend Policy 5.C to clarify that 500sqm commercial includes changes of use, conversions and major refurbishments.</p> <p>Amend Policy 6.A.5 to clarify that 500sqm commercial includes changes of use, conversions and extensions.</p> <p>Amend Policy 4 table 16.1 to clarify that on site-reductions are 60% and off setting is 40%</p> <p>In general, Local Plan policies apply to all relevant developments, irrespective of ownership. Therefore, Policy 4 does not include flexibility in relation to charitable and cultural institutions; however, part E.1 does set out that 'off-site provision instead of a cash-in-lieu contribution is only acceptable if an alternative proposal is identified, delivery of that proposal is certain and subject to agreement by the Council', which is considered sufficiently flexible for circumstances such as those described by the respondent.</p>

Policy 6. Sustainable Construction Standards				
697	Tim Catchpole, Mortlake with East Sheen Society	Policy 6. Sustainable Construction Standards	<p>Water Efficiency Para 16.37 about “water stressed” does not square with the observation that the water levels in the major Chalk aquifer under London are rising well above the Victorian era lows caused by over extraction. This aquifer must now be considered a significant water resource for balancing high versus low rainfall years. Of course, the requirement for high standards of water efficiency in new developments should remain.</p>	Comment noted.
698	James Stevens, Home Builders Federation (HBF)	Policy 6. Sustainable construction standards	<p>Part A states: A. Developments will be required to achieve the highest standards of sustainable design and construction. The policy then sets out requirements for residential development that go further than the London Plan and the national Building Regulations especially a requirement to achieve a four-star rating (as a minimum) under the BRE Home Quality Mark scheme. This is a disproportionate position and one that places a significant barrier to smaller developers attempting to deliver minor developments. We advise the Council to not make additional policy in this area, and adhere to policies in the London Plan plus any new requirements introduced via changes to the Building Regulations.</p>	Comment noted. Following the completion of the Council’s Net Zero Carbon Study, BREEAM requirements have been amended to require evidence by an accredited assessor if a development is unable to achieve Outstanding; in this instance BREEAM Excellent would be supported. The threshold for BREEAM non-domestic new construction has been increased from 100sqm to 500sqm following the findings of the Study.
699	Charlotte Orrell, DP9 Ltd on behalf of London Square Developments	Policy 6 - Sustainable Construction Standards	<p>We welcome the Council’s commitment to secure the highest standards of sustainable design and construction as outlined under draft Policy 6. However, we consider that these are unduly onerous and costly. In particular, the rigid application of this policy (as worded) will likely deter SMEs from locating to the borough (due to the high fit out costs) as well as future development and investment in the borough, as it becomes unviable to deliver new commercial schemes. It is our opinion that achieving a BREEAM ‘Outstanding’ rating for the commercial elements will have a negative impact on economic growth and job creation and therefore be contrary to the Council’s strategic vision. It is also unusual both within and outside of London boroughs to require an ‘Outstanding’ rating. The BRE define an Outstanding rating as one appropriate for an ‘innovator’ building and represents less than 1% of UK non-domestic buildings. We think it is more appropriate to target an Excellent rating, defined by the BRE as ‘best practice’ covering 10% of the UK’s non-domestic buildings. In addition, achieving any BREEAM rating is over and above the requirements of the London Plan and the Council’s evidence base has failed to justify why a high rating is required in Richmond.</p>	<p>Comment noted. Following the completion of the Council’s Net Zero Carbon Study, BREEAM requirements have been amended to require evidence by an accredited assessor if a development is unable to achieve Outstanding; in this instance BREEAM Excellent would be supported. The threshold for BREEAM non-domestic new construction has been increased from 100sqm to 500sqm following the findings of the Study.</p> <p>Amend policy 6 as follows: New non-residential buildings over 100-500sqm will be required to meet BREEAM Non-domestic New Construction ‘Outstanding’ standard or equivalent.</p>
700	Councillor Richard Warren	Policy 6. Sustainable Construction Standards.	<p>We really ought to encourage prefabrication/modular construction because that would speed-up the construction process and reduce pollution and disruption, with fewer lorry trips needed and less noise and dust generated by building work. Owing to the precision of pre-fabrication, modern modular buildings tend to have high levels of insulation, so are more energy efficient than traditionally built homes, and fewer snagging problems. I would like to have the following wording included, please: “Developers will be encouraged to use modular assembly methods (pre-fabrication) at their development sites. Developers that want to use other, non-modular construction methods would need to present compelling environmental reasons for doing so.” Modular construction is commonplace in Austria and Germany. Modular construction is suitable for sites large and small. Croydon is home to the world’s tallest modular tower: 101 George Street comprises two towers, one of 44-storeys and the other 38-storeys. Together they contain 546 build-to-rent apartments. https://www.hta.co.uk/project/101-georg-e-street Modular construction is also suitable for small projects. In Cambridge, six modular homes were created for rough sleepers two years ago: https://www.bigissue.com/latest/micro-homes-for-cambridge-rough-sleepers-built-by-formerly-homeless-people/ In addition to brand new developments, factory-made units can be added to existing period architecture, which has been the case in St John’s Wood, where several Victorian mansion blocks have had rooftop extensions craned onto them and fully assembled and connected with the rest of the building within two weeks. If Croydon, Cambridge and St John’s Wood can embrace the future, then I believe we can too. Indeed, I believe our borough’s residents would welcome reduced pollution, dust and disruption during a speeded-up on-site construction process and the subsequent availability of well-insulated, sustainably built homes.</p>	Comment noted. The Council agrees that modular construction does pose a useful opportunity for delivering more sustainable developments, as set out in paragraph 17.40 of the Regulation 18 Local Plan. However, it would be too limiting to set it out as the default requirement for developers. Additional wording has been added to the supporting text of Policy 15 to recognise modern methods of construction can assist particularly on smaller and awkward sites, provided it achieves the same high-quality design and standards as traditional housing.
701	Nick Alston, Avison Young on behalf of St George Plc and Marks & Spencer	Policy 6 Sustainable Construction Standards	<p>Policy 6, as currently drafted, is not in accordance with national policy, not in general conformity with the London Plan, nor justified. We explain this and set out recommended amendments to make the policy sound, below: Explanation There is a considerable deviation from National Planning Policy and from the London Plan, neither of which require BREEAM or the voluntary Home Quality Mark standard. Key BREEAM credit philosophy has been embedded into the London Plan 2021 without specifically requiring certification, allowing greater design freedom. Home Quality Mark is a voluntary scheme, which was established so that house builders and developers could distinguish their properties and sustainability credentials. Mandating it will diminish this intent. Policy does not take into consideration practical implications to ‘Shell Only’ and ‘Shell & Core’ BREEAM Assessments, which are considerably harder to achieve credits for due to the reduced number of available credits, therefore reducing design flexibility. Site constraints often make ‘Outstanding’ onerous to achieve, regardless of the Development design quality. This is particularly true for ‘Shell Only’ assessments where the scope only covers capped services. These assessments are likely to require an upgraded scope of works so that core services are fitted to enable improvements in efficiency. This will require efficient core services and renewable technology dedicated solely to the commercial areas. BREEAM ‘Outstanding’ is a considerable uplift to the more common ‘Excellent’ rating, which requires BREEAM Assessor input from RIBA 0 which is often prior to consultant appointments. A BRE briefing paper ‘The value of BREEAM’ estimates an uplift in capital cost of 10% for retail and office building types. It is necessary that all pre-planning credits are targeted where possible and this will put additional pressure on planning stage budgets.</p>	<p>Comment noted. Following the completion of the Council’s Net Zero Carbon Study, BREEAM requirements have been amended to require evidence by an accredited assessor if a development is unable to achieve Outstanding; in this instance BREEAM Excellent would be supported. The threshold for BREEAM non-domestic new construction has been increased from 100sqm to 500sqm following the findings of the Study.</p> <p>Amend policy 6 as follows: New non-residential buildings over 100-500sqm will be required to meet BREEAM Non-domestic New Construction ‘Outstanding’ standard or equivalent.</p> <p>The supporting text has been amended to clarify that the final ratings for BREEAM need to be applied to shell and core or core only developments</p> <p>Amend paragraph 16.28 as follows: 16.28 ...The subsequent fit-out of the building must upgrade the project to a BREEAM New Construction fully fitted rating and certification; this will be secured</p>

			<p>Key BREEAM Outstanding credits are often achieved on non-BREEAM Developments. BREEAM Outstanding represents a 66% carbon reduction over building regulations, which will be met from the Approved Document Part L 2021 and Approved Document Part L 2025 under the Future Homes Standard, in addition to the adoption of all-electric energy strategies. The Circular Economy and WLC requirements of London Plan 2021 surpass those of BREEAM Outstanding, successfully reducing waste, embodied carbon, and encouraging sustainable procurement methods. The London Plan also requires futureproofing through dynamic thermal overheating assessments following CIBSE TM52/59, and the prediction of operational energy performance through CIBSE TM54 which goes beyond the requirements of BREEAM Outstanding.</p> <p>Approved Document Part L 2021 does not stipulate a specific FEES kWh/m2/yr target, but is instead informed by the Notional Building as defined by the SAP and SBEM methodologies. The targets under Policy 6 align closely with the London Energy Transformation Initiative (LETI) which is a voluntary standard and onerous to achieve.</p> <p>Recommended Amendments</p> <p>London Plan 2021 targets BREEAM minimum performance for selected key credit criteria, such as energy and water, and surpasses BREEAM Outstanding for other key areas, such as the reduction in carbon emissions and prediction of operational energy performance, reduction in water consumption, embodied carbon benchmarks via Whole Life Cycle Carbon assessments, and the reduction of demolition and construction waste via Circular Economy Statement. It is therefore recommended that London Plan 2021 policies be targeted which shall cover the key BREEAM credits.</p> <p>The Fabric Energy Efficiency Targets should be based on Building Regulation compliance in accordance with Approved Document Part L 2021 and the 2025 Future Homes Standard iteration, as this will be variable based on the design and Notional specifications used under the SAP and SBEM methodologies.</p>	<p>via legal agreement or planning condition, as appropriate. <i>It is important to note that the requirement for the final BREEAM rating needs to also be applied to the shell and core or core only developer and not just the final developer as once the final fit out has taken place many of the necessary credits to achieve the required BREEAM rating are no longer available.</i></p> <p>The Fabric First Energy Efficiency Targets have been tested through a Net Zero Carbon Study and are considered achievable.</p>
702	David Wilson, Thames Water	Policy 6. Water Efficiency/Climate Change	<p>The Environment Agency has designated the Thames Water region to be “seriously water stressed” which reflects the extent to which available water resources are used. Future pressures on water resources will continue to increase and key factors are population growth and climate change.</p> <p>Water conservation and climate change is a vitally important issue to the water industry. Not only is it expected to have an impact on the availability of raw water for treatment but also the demand from customers for potable (drinking) water. Therefore, Thames Water support the mains water consumption target of 110 litres per head per day (105 litres per head per day plus an allowance of 5 litres per head per day for gardens) as set out in the NPPG (Paragraph: 014 Reference ID: 56-014-20150327) and support the inclusion of this requirement in Policy.</p> <p>Thames Water promote water efficiency and have a number of water efficiency campaigns which aim to encourage their customers to save water at local levels. Further details are available on our website via the following link: https://www.thameswater.co.uk/Be-water-smart</p> <p>We support the water efficiency comments in Policy 6, but it is our understanding that the water efficiency standards of 105 litres per person per day is only applied through the building regulations where there is a planning condition requiring this standard (as set out at paragraph 2.8 of Part G2 of the Building Regulations). As the Thames Water area is defined as water stressed it is considered that such a condition should be attached as standard to all planning approvals for new residential development in order to help ensure that the standard is effectively delivered through the building regulations.</p> <p>Proposed policy text: <i>“Development must be designed to be water efficient and reduce water consumption. Refurbishments and other non-domestic development will be expected to meet BREEAM water-efficiency credits. Residential development must not exceed a maximum water use of 105 litres per head per day (excluding the allowance of up to 5 litres for external water consumption). Planning conditions will be applied to new residential development to ensure that the water efficiency standards are met.”</i></p>	<p>Comment agreed.</p> <p>Amend paragraph 16.38 as follows:</p> <p>‘16.38...All new residential developments including conversions, reversions, change of use and extensions that create one or more new dwellings must meet this target. <i>Development must be designed to be water efficient and reduce water consumption. Refurbishments and other non-domestic development will be expected to meet BREEAM water-efficiency credits. Planning conditions will be applied to new residential development to ensure that the water efficiency standards are met.</i>’</p>
703	Jon Rowles	Policy 6. Sustainable Construction Standards	<p>The council is relying upon BREEM standards and not Passivhaus (which was at one point was in the national LibDem manifesto). The Council is trying to deliver a large part of its housing targets by an intensification of town centres. However, many of these areas are under stress and are not have the proper infrastructure for the existing residents. For example, one service road behind Whitton High Street just has hardcore with no drains or street lighting. All town centres are suffering from poor refuse bin management where service yards have been lost to shop extensions leaving no space to store rubbish.</p>	<p>The Council considers BREEAM to be the preferred construction standard and will enable more sustainable developments to come forward in the borough.</p>
-	Melanie Gurney, The Planning Lab, on behalf of the Royal Botanic Gardens	Policy 6	<p>[See comment 691 regarding the non-residential threshold]</p>	<p>Comments noted. Clarifications have been added to the policy as suggested. Additionally, it should be noted that in Policy 6.A.5 the requirement has been increased from 100sqm to 500sqm.</p> <p>Amend Policy 4.D to clarify that 500sqm commercial includes changes of use, conversions and major refurbishments.</p> <p>Amend Policy 5.C to clarify that 500sqm commercial includes changes of use, conversions and major refurbishments.</p> <p>Amend Policy 6.A.5 to clarify that 500sqm commercial includes changes of use, conversions and extensions.</p> <p>Amend Policy 4 table 16.1 to clarify that on site-reductions are 60% and off setting is 40%</p> <p>In general, Local Plan policies apply to all relevant developments, irrespective of ownership. Therefore, Policy 4 does not include flexibility in relation to charitable</p>

				and cultural institutions; however, part E.1 does set out that ‘off-site provision instead of a cash-in-lieu contribution is only acceptable if an alternative proposal is identified, delivery of that proposal is certain and subject to agreement by the Council’, which is considered sufficiently flexible for circumstances such as those described by the respondent.
-		Policy 7. Waste and the circular economy (Strategic Policy)		
704	Heather Mathew, Richmond Council for Voluntary Service (CVS)	Paragraph 2.38 (related to Policy 7)	2.38 Food waste – one of the things that the pandemic has highlighted is the availability of surplus food from retailers and the work of community groups such as the Real Junk Food project in St Margaret’s to use and distribute for community benefit (Bellies not bins). However much of the distribution involves multiple vehicle journeys around the borough, contributing to emissions etc. It would be useful to reference use of surplus food and think through where does this sit in plans for infrastructure.	Note the concerns around surplus food waste and the infrastructure for distribution, although this is not related to new development and beyond the remit of the Local Plan, although there is general support for active travel and living locally for example cycle-based distribution hubs.
705	Nina Miles, GLA on behalf of Mayor of London	Policy 7. Waste and the circular economy (Strategic Policy)	The Mayor welcomes the requirement in Policy 7 for Whole Life-Cycle Carbon Assessments. These should be carried out in accordance with the Mayor’s Whole Life-Cycle Carbon Assessments guidance and that should be referenced within the supporting text. Waste London Plan Policy SI 8 Part B3 requires boroughs to allocate sufficient land (sites and/or areas) and identify waste management facilities to provide the capacity to manage their apportioned tonnages of waste. Where apportionments are pooled, boroughs must demonstrate how their joint apportionment targets will be met, for example through joint waste Development Plan Documents. We welcome Policy 7 that seeks to safeguard Richmond’s existing waste sites and that the policies of the West London Waste Plan 2015 and London Plan will be used to assess proposals affecting existing waste management sites or for additional waste management facilities. We note that the WLWP is due for review in 2031 and it should be made clear within the Plan that the waste apportionment over the lifetime of the plan will be accounted for	Add a sentence to the supporting text of Policy 7 at paragraph 16.7 to reference this London Plan Guidance document. Amend paragraph 16.4 to say that the Council will apply the policies of the WLWP over the lifetime of the Local Plan.
706	George Goodby, Environment Agency	Policy 7. Waste and the circular economy (strategic policy)	Section A, point 3: Where rivers are used to transport construction materials and waste, the protection of the river ecosystem is of paramount importance. Please include a requirement for a Construction Environment Management Plan (CEMP) for all development using the river to transport construction materials and waste. The CEMP should demonstrate how the river will be protected during the transportation of construction materials and waste.	Add a reference to Section A, point 4 for the need for a Construction Environment Management Plan (CEMP) to be required for all development using the river to transport construction materials and waste. Add a sentence at paragraph 16.2 to state that we will require a Construction Environment Management Plan to be produced when it is proposed to use the river to transport construction materials and waste.
707	George Goodby, Environment Agency	Policy 7. Waste and the circular economy (Strategic Policy) – General comments in relation to Waste Management	Local waste management activities that are poorly run can pollute the environment, cause harm to human health and generate nuisance impacts for local communities. Illegal waste activity can blight local areas as well as polluting the environment and causing harm to human health. Waste planning has a role to play in delivering objectives including reducing greenhouse gas emissions, the better management of resources and protecting the environment. Waste management facilities have the potential to pollute the environment through emissions to air, releases to ground and surface water and leaving a legacy of contaminated land. Waste Local Plans can help prevent this by making sure that sites for waste facilities are located and designed to minimise their impact. Effective planning for waste infrastructure needs to reflect the needs of neighbouring authorities, or further afield in the case of some waste streams such as hazardous waste or other specialist waste streams.	Noted.
708	Tim Catchpole, Mortlake with East Sheen Society	Policy 7. Waste and the circular economy (Strategic Policy)	No comment.	Noted.
709	Philip Villars, WSP on behalf of Sharpe Refinery Service Limited	Place Based Strategy for Twickenham, Strawberry Hill and St Margarets Policy 7	We have broadly set out our comments in relation to the place based strategy above. We do not find the approach to this policy to meet the requirements of Section 3 of the NPPF. The policy has failed to consider sites such as Arlington Works which could significantly contribute to the aims of the place based strategy and deliver the identified much needed homes and commercial floorspace within the London Borough of Richmond. Policy 7, Part B states that the borough’s waste sites are safeguarded and that the evidence which underpins this policy is the West London Waste Plan (2015) and an unreferenced version of the London Plan. Firstly this policy should be based upon an up to date evidence base and not one that is over seven years old. Secondly to be sound this policy should refer to a referenced version of the London Plan. At present this policy does not meet the requirements of Section 3 of the NPPF. In relation to Policy 7, we consider the following to be necessary: - In accordance with paragraph 21 of the NPPF this policy should be clear as to whether it is strategic; - In accordance with paragraph 31 of the NPPF, policies should be underpinned by relevant and up to date evidence. Policy 7 is relying upon evidence from the out of date West London Waste Plan (2015). The evidence base is out of date as it over seven years old. Paragraph 31 also goes on to state that the evidence should also take into account relevant market signals which Policy 7 does not. Policy 7 will continue to safeguard a disused waste site, which is in direct conflict with Policy GG2 of the London Plan.	See also response to comment 265 regarding the place-based strategy and the NPPF. The Council recognise that the West London Waste Plan (2015) is over five years old and a review of the 2015 Waste Plan is planned to commence. Add ‘(2021)’ to Policy 7 Part B to ensure that the latest version of the London Plan is referenced. Policy 7 already states that it is a strategic policy in line with paragraph 21 of the NPPF, so no amendments are considered necessary in this regard. Policy SI9 Point A titled Safeguarded Waste Sites in the London Plan states that ‘Existing waste sites should be safeguarded and retained in waste management use.’ Policy 7 is therefore justified in continuing to safeguard waste sites within the borough. An appeal was dismissed concerning a planning application at the Arlington Works site. The Inspector’s conclusions on waste were that the proposed development would be significantly harmful to London’s strategic approach to the management

				of waste and that the scheme would be in conflict with Policy WLWP 2 of the Waste Plan, with Policy LP 24 of the Local Plan, and with Policies SI 8 and SI 9 of the PVL (then the publication version of the London Plan, now the London Plan 2021).
				As a result of the above, in the instance of Arlington Works, the Council will continue to safeguard the existing waste site and so Policy GG2 'Making the best use of land' within the London Plan does not apply. No changes to the policy are considered necessary on this point.
-		Policy 8. Flood risk and sustainable drainage (Strategic Policy)		
710	Hilary Pereira, River Thames Society	Policy 8. Flood risk and sustainable drainage, riverside sites.	The place-based strategies demonstrate the importance of the river – all but Whitton and Heathfield (D) include at least one bank of the Thames. The riverside sites fingered for development are well-known, and for some like Twickenham Riverside the RTS has been engaged in extensive previous consultation. In general, the RTS is supportive of the overall principles and policies which are being proposed, just the local site-specific detail may at times be more problematic for us, as in the latest plans for Twickenham Riverside and the previous overdevelopment at the Mortlake brewery site. The RTS will continue to comment on specific planning applications, and is likely to continue to use in support the agreed policies and general principles from the Richmond and London plans. The RTS hopes it will be able to rely on the planners to insist on real exceptionality for any built development in MOL (including over Thames water-space) or within 16 meters of the bank of the tidal river.	Comments noted.
711	Tim Catchpole, Mortlake with East Sheen Society	Policy 8. Flood risk and sustainable drainage (Strategic Policy)	<p>We urge that you include a policy stating that flood-risk areas are protected from storm surges and rising sea levels. Ideally there needs to be a pre-amble about this issue but you haven't shown any such pre-ambles throughout the document, so it needs to be the opening paragraph of your supporting text, as follows:</p> <p>The major and most unpredictable flood risk in the Borough is from storm surges in the North Sea inundating the Thames Estuary. In February 1953 many lives were lost on Canvey Island and the flooding of Barnes, Mortlake and Richmond was severe. Recent research (2021) indicates that the levels could have been up to a metre higher at the Sheerness Tidal Observatory if the storm centre had moved at a slightly lower velocity. If a storm surge occurs in conjunction with spring high tides and heavy, persistent rainfall with high run-off and fluvial flooding then the Environment Agency's worst case scenario would be exceeded by a metre or more. The Thames Barrier would be overwhelmed and much of London, the underground system and basements would be severely flooded with consequent loss of life and disruption. With rising sea-levels and more importantly more extreme weather provoked by climate warming, this scenario must be addressed and not swept under the carpet!</p> <p>In summary the Borough is at risk of flooding from six major factors in order:-</p> <ol style="list-style-type: none"> 1. Storm surges in the North Sea 2. Tidal flooding 3. Fluvial flooding 4. Surface water run-off 5. Groundwater 6. Sewer capacity overflow <p>Without a new vastly improved Thames Barrier factor 1 is impossible to mitigate while factors 2 and 3 can be mitigated with higher flood defences. The other three factors are mainly very localised in effect and can be improved with coherent engineering works and maintenance, but they would all three probably exacerbate any major storm surge flooding.</p> <p>Table 16.3 Flood Zones A Zone 0 should be added with the same parameters as Zone 1 to take account of the extreme storm surge flooding.</p> <p>Sustainable drainage Item H.2.a. This should read 2 l/s per sq metre runoff rate.</p> <p>Table 16.4 Basements in areas of flood-risk Flood Zone 1 should be added to Flood Zone 2 and a Flood Zone 0 should be inserted in place of Flood Zone 1 with a note saying "If a basement, basement extension or conversion is acceptable in principle in terms of its location, it must have internal access to a higher floor, and flood resistant and resilient design techniques must be adopted."</p>	<p>The policy takes account of the latest flood modelling provided by the Environment Agency, which includes climate change allowances. The policy also refers to the Thames Estuary 2100 Plan, which deals with the potential threat of storm surges and associated tidal flooding.</p> <p>The policy uses the national government definitions for flood zones, in which a Zone 0 does not exist.</p>
712	Vicky Phillips, Habitats & Heritage	Policy 8. Flood risk and sustainable drainage (Strategic Policy) - Section 'Flood Defences' I & J	paras I and J – we think there should be some reference here to the Thames Landscape Strategy, including its work on flooding via the "Rewilding Arcadia" project.	The Council has made a change to paragraph 16.75 of the supporting text so that it reads; "Natural flood management methods, such as those included in the Thames Landscape Strategy's 'Rewilding Arcadia' project, should be employed in development proposals due to their multiple benefits including increasing flood storage and creating leisure areas and habitat."
713	George Goodby, Environment Agency	General comments in relation to Flood Risk	<p>As set out in Schedule 4 'Consultations before the grant of permission' of the Town and Country Planning (Development Management Procedure) (England) Order 2015, the Environment Agency is a statutory consultee for development in the bed of or within 20 metres of a main river and for certain development in flood risk areas as defined in the Flood Risk Standing Advice (FRSA) guidance. The flood zones refer to fluvial and tidal flooding only and therefore the risks of any other flooding, for example surface water and ground water, should be discussed with the appropriate authority. We also recommend that you discuss any Emergency Planning matters, such as safe access and egress requirements, with the relevant team.</p> <p>We welcome your ambition set out in the draft Local Plan to go above and beyond the recommendations of national policy and guidance for managing flood risk, for example through using higher climate change allowances and requesting sites to deliver additional flood storage. Whilst these ambitions reflect your Climate Emergency declaration, we urge you to consider the</p>	<p>The remit of the Environment Agency as a statutory consultee is noted.</p> <p>The Council has amended Policy 8 Part L to amend the requirement for climate change allowances from 'upper end' to 'central'. See comment 727.</p> <p>The stronger link between tackling climate change and flood risk management is noted.</p>

			practical implications of this. We would also recommend that the plan strongly emphasises the connection between tackling climate change and flood risk management. [See comments 233, 247, 249, 250, 685, and further comments below against Policy 8 for more detailed comments on flood risk]	
714	David Wilson, Thames Water	Policy 8 - Flood Risk & Sustainable Drainage	<p>In relation to flood risk, the National Planning Practice Guidance (NPPG) states that a sequential approach should be used by local planning authorities in areas known to be at risk from forms of flooding other than from river and sea, which includes "Flooding from Sewers". We therefore support the reference to sewer flooding in Policy S8.</p> <p>When reviewing development and flood risk it is important to recognise that water and/or sewerage infrastructure may be required to be developed in flood risk areas. By their very nature water and sewerage treatment works are located close or adjacent to rivers (to abstract water for treatment and supply or to discharge treated effluent). It is likely that these existing works will need to be upgraded or extended to provide the increase in treatment capacity required to service new development. Flood risk sustainability objectives should therefore accept that water and sewerage infrastructure development may be necessary in flood risk areas.</p> <p>Flood risk policies should also make reference to 'sewer flooding' and an acceptance that flooding can occur away from the flood plain as a result of development where off site sewerage infrastructure and capacity is not in place ahead of development.</p> <p>With regard to surface water drainage it is the responsibility of the developer to make proper provision for drainage to ground, watercourses or surface water sewer in accordance with the London Plan drainage hierarchy (Policy SI 13). It is important to reduce the quantity of surface water entering the sewerage system in order to maximise the capacity for foul sewage to reduce the risk of sewer flooding.</p> <p>Limiting the opportunity for surface water entering the foul and combined sewer networks is of critical importance to Thames Water. Thames Water have advocated an approach to SuDS that limits as far as possible the volume of and rate at which surface water enters the public sewer system. By doing this, SuDS have the potential to play an important role in helping to ensure the sewerage network has the capacity to cater for population growth and the effects of climate change.</p> <p>SuDS not only help to mitigate flooding, they can also help to: improve water quality; provide opportunities for water efficiency; provide enhanced landscape and visual features; support wildlife; and provide amenity and recreational benefits.</p> <p>With regard to surface water drainage, Thames Water request that the following paragraph should be included in the Policy wording or supporting text: <i>"It is the responsibility of a developer to make proper provision for surface water drainage to ground, water courses or surface water sewer. It must not be allowed to drain to the foul sewer, as this is the major contributor to sewer flooding."</i></p>	<p>Paragraph one, noted.</p> <p>Paragraph two, noted, no change required. Policy 8 allows essential utility infrastructure (including sewage infrastructure) in flood risk areas where it must be located and no alternative locations are available and it can be demonstrated that the development would be safe, without increasing flood risk elsewhere and where possible would reduce flood risk overall.</p> <p>Paragraph three – policy 8 A states that all developments will need to be made safe for their lifetime and clearly demonstrate that they avoid, minimise or reduce contributing to all sources of flooding, including fluvial, tidal, surface water, groundwater and flooding from sewers, taking account of climate change, and that they do not increase flood risk elsewhere.</p> <p>Paragraph 16.65 of the supporting text already states that flooding can occur when infrastructure is not in place ahead of development, and a link is made to Policy 9.</p> <p>It is considered that the wording currently included within the draft Local Plan supports the point being made by Thames Water and that it is not necessary to include the wording set out in bold addressing surface water drainage and foul sewers. Policy 8 Part H requires the use of SuDS in all development proposals to manage surface water runoff as close to its source as possible, and that ideally all surface water should be managed on site. Paragraph 16.69 sets out the London Drainage hierarchy and paragraph 16.70 sets out the conditions that a developer needs to meet if it is necessary for a developer to discharge surface water to a public sewer.</p>
715	George Goodby, Environment Agency	Policy 8 – Flood Risk and Sustainable Drainage (Strategic Policy) Part A	<p>Please note that our comments are related to fluvial and tidal flood risk only.</p> <p>Part A of the policy states <i>'Unacceptable developments and land uses will be refused in line with national policy and guidance, the Council's Strategic Flood Risk Assessment (SFRA) and as outlined in the table below.'</i></p> <p>Applications will be refused against policy so it may be worthwhile differentiating between being refused against policy and the role of guidance such as the SFRA.</p> <p>Recommended action: clarify the role of policy and guidance.</p> <p>Part A states that <i>'all development should avoid, or minimise, contributing to all sources of flooding...'</i></p> <p>The term <i>'minimise'</i> suggests that some increase in flood risk is acceptable. For fluvial and tidal flooding, this is contrary to NPPF which states that <i>'development should be made safe for its lifetime without increasing flood risk elsewhere'</i>. We strongly recommend this wording is altered.</p> <p>Recommended action: we strongly recommend reviewing the wording of this phrase.</p> <p>Whilst we support that Part A sets out the requirement for the Sequential Test and Exception Test, it fails to encourage a sequential approach to the layout of sites. For example, if a site is partially within Flood Zone 3 and Flood Zone 1, any development should be located within Flood Zone 1 or the most vulnerable uses should be located in Flood Zone 1 rather than Flood Zone 3. We strongly recommend including the requirement for a sequential approach to the layout of sites affected by flood risk within this policy, as outlined in Paragraph 162 of the NPPF.</p> <p>Recommended action: we strongly recommend including the requirement for a sequential approach within this policy.</p>	<p>The Council has changed Policy 8 A so that the sentence at the end of the paragraph reads; "Unacceptable developments and land uses will be refused in line with national policy and guidance, the requirements set out in the Council's Strategic Flood Risk Assessment (SFRA) and as outlined in the table below."</p> <p>The Council has changed the first sentence of Policy 8 Part A to read; "All developments will need to be made safe for their lifetime and clearly demonstrate that they avoid, minimise or reduce contributing to all sources of flooding, including fluvial, tidal, surface water, groundwater and flooding from sewers, taking account of climate change, and that they do not increase flood risk elsewhere."</p> <p>The Council has changed Policy 8 A to include a sentence that reads; "Development will be guided to areas of lower risk by applying the 'Sequential Test' as set out in national policy guidance, and where necessary, the 'Exception Test' will be applied. A sequential approach should be taken to the layout of sites, locating development in areas at lowest risk from flooding on a site."</p> <p>In addition, a new paragraph has been added to the supporting text in this regard.</p>
716	George Goodby, Environment Agency	Policy 8 – Flood Risk and Sustainable Drainage (Strategic Policy) Part B	<p>Part B begins <i>'To enable development, proposals must provide mitigation and resilience against flood risk, taking advice from the Lead Local Flood Authority (LLFA) as appropriate, and provide appropriate compensation to existing flood risk levels and volumes'</i>.</p> <p>We would recommend moving reference to LLFA between <i>'to enable development, proposals must provide mitigation and resilience against flood risk'</i>...and ... <i>'provide appropriate compensation to existing flood risk levels and volumes'</i>. We would recommend that if you wish to reference taking advice from the LLFA then you should move this to the end of Part B. You should also reference seeking advice from the Environment Agency. By not including the Environment Agency here, applicants may infer that the policy only requires mitigation and resilience against surface water flood risk, which the LLFA is responsible for, and excludes the requirement from other sources of flooding, such as tidal and fluvial which the Environment Agency is responsible for.</p> <p>Recommended action: We strongly recommend that you include reference to the Environment Agency as well as the LLFA.</p>	<p>The Council have changed Policy 8 B to read; "To enable development, proposals must provide mitigation and resilience against flood risk, taking advice from the Lead Local Flood Authority (LLFA) as appropriate, and provide appropriate compensation to existing flood risk levels and volumes, addressing the predicted 1 in 100 year Risk of Flooding from Surface Water (RoFSW) mapped depths as a minimum. Advice should be sought from the Lead Local Flood Authority (LLFA) and the Environment Agency as appropriate."</p>
717	George Goodby, Environment Agency	Policy 8 – Flood Risk and Sustainable Drainage (Strategic Policy) Part B	<p>Part B states that <i>'...proposals must provide mitigation and resilience against flood risk...'</i> however, it does not set out what appropriate mitigation and resilience measures would be for fluvial and tidal flooding. This would mostly relate to our finished floor level requirements which we have determined to be the most appropriate mitigation and resilience measures.</p>	<p>The Council has changed the first sentence of Policy 8 B to read; "To enable development, proposals must provide mitigation and resilience against flood risk as set out in the Council's SFRA, taking advice from the Lead Local Flood Authority"</p>

			<p>For fluvial flooding, the finished floor levels for all developments of all vulnerability classifications must be set 300mm above the 1 in 100 plus appropriate climate change allowance flood level. For developments impacted by defended tidal flooding, as a minimum all sleeping accommodation must be located on finished floor levels above the Thames Tidal Breach 2100 flood level. We strongly recommend incorporating these requirements into the policy wording. This will ensure development is safe for its lifetime for future occupants as required in Paragraph 159 of the NPPF. If this is not possible, an alternative option would be perhaps adding this information to the supportive text or adding a footnote to the relevant section in the Level 1 SFRA where guidance is provided on this would be useful to applicants (Table 6-1. Planning Application and Development Requirements for All Developments (Flood Zones 1, 2, 3a and 3b)).</p> <p>Recommended action: include specific finished floor level requirements for developments in the fluvial and defended tidal floodplains within the policy wording.</p>	<p>(LLFA) as appropriate, and provide appropriate compensation to existing flood risk levels and volumes, addressing the predicted 1 in 100 year Risk of Flooding from Surface Water (RoFSW) mapped depths as a minimum.”</p> <p>In addition, the Council has proposed additional text to be included within the supporting text to set out these specific requirements, including a reference to Table 6-1 in our Level 1 SFRA.</p>
718	George Goodby, Environment Agency	Policy 8 – Flood Risk and Sustainable Drainage (Strategic Policy) Part B	<p>Part B goes on to state ‘...and provide appropriate compensation to existing flood risk levels and volumes, addressing the predicted 1 in 100 year Risk of Flooding from Surface Water (RoFSW) mapped depths as a minimum’.</p> <p>Development must also ensure appropriate flood storage compensation is provided for the fluvial and undefended tidal floodplain. The undefended tidal floodplain is riverward of the flood defences.</p> <p>For the fluvial floodplain, any loss of flood storage within the fluvial 1 in 100 inclusive of climate change flood extent (for example through an increase in built footprint or change of ground levels) must be compensated for on a level-for-level and volume-for-volume basis. For the undefended tidal floodplain, to ensure there is no loss of flood storage there should be no increase in built footprint or raising of ground levels as level-for-level and volume-for-volume flood storage compensation is not achievable in this location. If water compatible structures, such as pontoons or slipways, are proposed, they should be designed to minimise the loss of flood storage i.e. by being floodable, hollow structures rather than concrete, solid structures.</p> <p>Recommended action: We strongly recommend that fluvial and undefended tidal flood storage compensation is referenced as well as surface water compensation. Please see our comments under Part D for further comments regarding flood storage compensation.</p> <p>[See comment 721 under Part D for further comments regarding flood storage compensation]</p>	<p>The Council’s SFRA provides this information in Table 6-1. We have added a reference to the Council’s SFRA to Policy 8 B for clarity.</p> <p>In addition, the Council has proposed additional text to be included within the supporting text to set out these specific requirements, including a reference to Table 6-1 in our Level 1 SFRA.</p>
719	George Goodby, Environment Agency	Policy 8 – Flood Risk and Sustainable Drainage (Strategic Policy) Part D	<p>Part D Part D states ‘Where a Flood Risk Assessment is required, on-site attenuation to alleviate fluvial and/or surface water flooding over and above the Environment Agency’s floodplain compensation is required where feasible.’</p> <p>We would recommend rewording this to distinguish between fluvial and pluvial flood mechanisms and mitigation requirements. For example, for surface water flood risk alleviation, onsite attenuation for surface water management to mitigate increased runoff rates and volumes. For fluvial flood risk alleviation, on site floodplain compensation provided on a level-for-level and volume-for-volume basis. Furthermore, perhaps adding a footnote to the relevant section in the Level 1 SFRA where guidance is provided on this would be useful to applicants.</p> <p>Recommended action: We recommend you separate the surface water and fluvial flood risk requirements.</p>	<p>The Council agrees with the proposal and has reworded policy 8 D to read; “Where a Flood Risk Assessment is required, appropriate on-site attenuation measures to alleviate either fluvial and/or surface water flooding should be provided over and above the Environment Agency’s floodplain minimum fluvial and undefended tidal flood storage compensation requirements where feasible is required where feasible.”</p>
720	George Goodby, Environment Agency	Policy 8 – Flood Risk and Sustainable Drainage (Strategic Policy) Part D	<p>With regard to the wording ‘Environment Agency’s floodplain compensation,’ the requirement for floodplain compensation is not just an Environment Agency requirement. It is a stance adopted by the Local Planning Authority following our guidance to ensure that flood risk is not increased elsewhere in line with national policy. It is therefore a requirement of national and local policy and not just an Environment Agency ask. We strongly recommend rewording this aspect of the policy to not place ownership solely on the Environment Agency. The wording could be along the lines of ‘...above and beyond the minimum fluvial and undefended tidal flood storage compensation requirements’ or ‘additional flood storage must be provided on top of ensuring no loss of fluvial and/or undefended tidal flood storage’.</p> <p>Recommended action: we recommend you review the wording ‘Environment Agency’s floodplain compensation’.</p>	<p>The Council agrees with the proposal and have reworded policy 8 D to read; Where a Flood Risk Assessment is required, appropriate on-site attenuation measures to alleviate either fluvial and/or surface water flooding should be provided over and above the Environment Agency’s floodplain minimum fluvial and undefended tidal flood storage compensation requirements where feasible is required where feasible.</p>
721	George Goodby, Environment Agency	Policy 8 – Flood Risk and Sustainable Drainage (Strategic Policy) Part D	<p>As currently written, Part D does not require additional compensation or attenuation. It states ‘over and above...where feasible.’ As written, this is open to interpretation and is not robust policy wording and therefore is unlikely to achieve any extra flood storage provision through the development management process. To make this robust it should be a requirement and written as ‘must provide additional volumes’ or ‘shall be provided’. If this is not the intention, then an explanation should be provided to define ‘feasible’ and set criteria and process for determining if it must be provided e.g. when additional space allows on site then this shall be provided.</p> <p>One approach to this could be to potentially request a certain percentage increase in storage, or a percentage reduction of built footprint on sites, a similar approach to the 10% Biodiversity Net Gain requirements set out in the Environment Bill. The implications and practicalities of this would need to be clearly thought out before included in as a policy requirement.</p> <p>We would like to note that applicants often highlight that their sites’ constraints restrict the overprovision of storage and in our experience, they struggle to provide no loss of flood storage, let alone an overprovision. This may be due to the size of the plots or their chosen designs and viability assessments. Therefore, if the council truly seeks to secure additional flood storage provision, then strong policy wording must be implemented.</p> <p>If our above comments cannot be incorporated, then even in its current wording we welcome the encouragement of additional flood storage as it can aid discussions in persuading developers to consider an increase in flood storage, even if it cannot be used to mandate it.</p> <p>Recommended action: we recommend you review the policy requirements and wording for providing additional flood storage. <i>Please note our comments relate to fluvial floodplain compensation and the undefended tidal floodplain only. Any surface water matters should be commented on by the Lead Local Flood Authority. Any safe access and egress matters should be discussed with the Local Planning Authority’s Emergency Planning Team.</i></p>	<p>The Council’s SFRA states that ‘compensatory storage provided must be equal to or exceed the storage lost to ensure there will be no net loss of flood storage’. Therefore, the Council has not implemented the wording recommended by the EA but instead has amended the Policy 8 D so it reads: Where a Flood Risk Assessment is required, on-site attenuation measures appropriate to alleviate either fluvial or surface water flooding should be provided over and above the minimum fluvial and undefended tidal flood storage compensation requirements where feasible.</p>
722	George Goodby, Environment Agency	Policy 8 – Flood Risk and Sustainable Drainage (Strategic Policy) Part E	<p>Part E ‘Table 16.3 Flood Zones, Restrictions, and Requirements’ in Part E explains that in FZ3b, ‘<i>Redevelopment of existing developed sites will only be supported if there is no intensification of the land use and a net flood risk reduction is proposed; any restoration of the functional floodplain will be supported.</i>’</p>	<p>The Council agrees with the proposed amendment and has changed text within Table 16.3 Policy 8 E and the section on ‘zone 3b’ to read: Redevelopment of existing developed sites will only be supported if there is no additional built</p>

			<p>Where it is states ‘no intensification of the land use’ it would be useful to define ‘land use’. We understand that this should relate to built development and/ or vulnerability of development. Perhaps the wording should be updated to ‘no additional built development within undeveloped functional floodplain and no increase in vulnerability’ within land shown as FZ3b. This would then read something like: ‘Redevelopment of existing developed sites will only be supported if there is no additional built development proposed within undeveloped functional floodplain, no increase in vulnerability and a net flood risk reduction is proposed; any restoration of the functional floodplain will be supported’. This change should also be reflected in the supporting text in paragraph 16.62.</p> <p>Recommended action: update the wording to clarify what is meant by ‘no intensification of the land use’ in Flood Zone 3b.</p>	<p>development proposed within undeveloped functional floodplain, no increase in vulnerability and a net flood risk reduction is proposed intensification of the land use and a net flood risk reduction is proposed; any restoration of the functional floodplain will be supported.</p> <p>The Council has also made a change to the first sentence of paragraph 16.62 of the supporting text so that it reads; “Redevelopment of existing developed sites will only be supported if there is a net flood risk reduction. Net flood risk reduction includes both on- and off-site measures, including reducing the land use vulnerability by not proposing additional built development within undeveloped functional floodplain, raising of floor levels, reduction in run-off, increasing flood storage capacity, reduced impedance to flood water flow and the incorporation of flood resilient and/or resistant measures.”</p>
723	George Goodby, Environment Agency	Policy 8 – Flood Risk and Sustainable Drainage (Strategic Policy) Part I and J - Flood Defences	<p>We welcome that this policy references the TE2100 Plan and the future defence maintenance, replacement and raising requirements.</p> <p>The future raising requirements of the flood defence levels in Richmond are as follows:</p> <ul style="list-style-type: none"> • Raising of all defences along the Thames by up to 0.5m by 2065, and by an additional 0.5m by 2100; • Raising of defences on Eel Pie Island by up to 0.8m by 2065, and by an additional 0.5m by 2100. <p>This allows for projected increases in sea level to 2135.</p> <p>We also have the following comments on the wording of Parts I & J of this policy:</p> <p>Part I 3 states ‘Unless exceptional circumstances are demonstrated for not doing so, development should be set back from riverbanks and existing flood defence infrastructure to allow for any foreseeable future maintenance and upgrades in a sustainable and cost effective way (16 metres for the tidal Thames and 8 metres for other rivers where possible)’.</p> <p>We welcome that the policy specifically mentions our set back requirements. The London Borough of Richmond contains several flood defence embankments. This is where raised ground, rather than a traditional hard engineered concrete wall, acts as the flood defence. To raise this infrastructure in the future, the areal extent of the structures will need to increase without encroaching on the river channel or limiting space for future maintenance. This section, and the supporting text, paragraph 16.74, should make it clear that some sites, specifically those defended by embankments, may need to provide more than 16 metres set back to allow for future raisings.</p> <p>As some suggested wording, Part I 3 could read along the lines of ‘Unless exceptional circumstances are demonstrated for not doing so, development should be set back from riverbanks and existing flood defence infrastructure to allow for any foreseeable future maintenance and upgrades in a sustainable and cost effective way. This must be a minimum of 16 metres for the tidal Thames and 8 metres for other rivers, although a greater set back may be required on some sites’.</p> <p>The supportive text in paragraph 16.74 could be expanded to mention that applicants should discuss appropriate set back with the Environment Agency prior to designing a site / submitting an application to the Local Planning Authority as greater set back than described in Part I 3 may be necessary depending on the flood defence design.</p> <p>Recommended action: We strongly recommend that Policy 8 part I 3 and Paragraph 16.74 of supporting text is updated to clarify that in some instances a greater set back may be required.</p> <p>Part I 3 states that set back should be achieved ‘...where possible’. As the policy already contains the wording ‘Unless exceptional circumstances are demonstrated for not doing so...’ we believe that the ‘where possible’ wording should be removed as this reduces the strength of the policy.</p> <p>Similarly, supporting text Paragraph 16.78 states ‘The Council, in conjunction with the Environment Agency, will seek a buffer zone of 8 metres on the borough’s rivers (including the fluvial Thames) and 16 metres for the tidal Thames where possible’. For the aforementioned reasons, the wording ‘where possible’ should be removed. If necessary, you could add the wording ‘Unless exceptional circumstances are demonstrated for not doing so...’ to reflect the policy wording.</p> <p>Recommended action: We strongly recommend that the wording ‘where possible’ is removed from Policy 8 Part I 3 and supporting text Paragraph 16.78.</p> <p><i>River Thames Scheme</i> – We welcome that the River Thames Scheme, in addition to the Thames Estuary 2100 Plan, is referenced within Policy 8 Part 4. At present, we have no additional information to pass on in relation to the River Thames Scheme. We will endeavour to keep you updated should we hear of any progress.</p> <p>Recommended action: London Borough of Richmond = no action. Environment Agency = to keep London Borough of Richmond updated on messaged around the River Thames Scheme when available.</p> <p><i>Active flood defences</i> - In the London Borough of Richmond, there are several sites that have active flood defences. For example, active flood defences include flood gates which require someone to close them for them to provide flood protection. We have also experienced several sites proposing to incorporate active flood defences in their proposed schemes. We do not accept new active flood defences as they rely on personnel to ensure they are in place which, for any number of reasons, may fail and therefore leaves areas vulnerable to flooding. This is supported by guidance set out in the TE2100 Plan. We would strongly recommend you incorporate a policy into this section of the local plan which ensures that no new active flood defences will be permitted, and which requires any developments coming forward that currently use active flood defences to replace them with permanent flood defences to achieve betterment through re-development. This will improve the flood protection of sites and ensure no new sites have inadequate protection.</p> <p>Recommended action: we strongly recommend you include a policy for no new active flood defences and replacement of existing active flood defences within Parts I or J of Policy 8.</p>	<p>The Council agrees with the suggestion for Policy 8 I 3 and a change has been made to the paragraph so it reads; “Unless exceptional circumstances are demonstrated for not doing so, development should be set back from riverbanks and existing flood defence infrastructure to allow for any foreseeable future maintenance and upgrades in a sustainable and cost effective way. (This must be a minimum of 16 metres for the tidal Thames and 8 metres for other rivers where possible)- although a greater set back may be required on some sites.”</p> <p>The Council has amended paragraph 16.78 of the supporting text as follows: “ Proposals for redevelopment should seek opportunities to set back the development from existing flood defences. The Council, in conjunction with the Environment Agency, will seek require a buffer zone of at least 8 metres on the borough’s rivers (including the fluvial Thames and culverted main rivers) and 16 metres for the tidal Thames where possible. For some sites, where they are specifically defended by embankments, development may need to provide more than 16 metres set back to allow for future raisings. In addition, an Environment Agency Flood Risk Activity Permit (FRAP) is required for certain activities that take place within either 8 metres or 16 metres from the main river, flood defence and/or a culvert. This is Development must be set back to allow for the maintenance and future upgrading of the flood defences as well as for improvements to flood flow and flood storage capabilities. There may be situations where it is not feasible to set back development by the above amounts. Where applicants wish to depart from these standards, full justification must be provided at planning application stage and agreed with the Environment Agency. Applicants are strongly encouraged to liaise with the Environment Agency for any development that could affect flood defence infrastructure as their consent will be required for any works that could affect the flood defences.</p> <p>The Council notes the Environment Agency’s comments regarding the River Thames Scheme.</p> <p>The Council has added a sentence to Policy 8 I 4 so that it reads: “Take into account the requirements of the Thames Estuary 2100 Plan and the River Thames Scheme, and demonstrate how the current and future requirements for flood defences have been incorporated into the development. This includes ensuring that no new active flood defences are delivered as part of a development and that any developments coming forward that currently use active flood defences replace them with permanent flood defences.”</p> <p>The Council has added a sentence to paragraph 16.76 of the supporting text so that it reads: “The protection of people, properties and infrastructure from the risk of fluvial and tidal flooding is essential in this borough and the integrity of the flood defence infrastructure must therefore be maintained. Flood defence infrastructure includes formal and informal flood defences and such defences may not always be recognisable and can include mounds, buildings and walls. The majority of formal flood defences are privately owned, and it is the flood defence owner’s responsibility for maintaining those formal flood defence structures as outlined in the Metropolis Management (Thames River Prevention of Flood) Act 1879 to 1962.”</p>

			<p><i>Ownership of flood defences</i> – The majority of formal flood defences are privately owned and it is the flood defence owner’s responsibility for maintaining those formal flood defence structures as outlined in the Metropolis Management (Thames River Prevention of Flood) Act 1879 to 1962. We recommend incorporating this information into supporting text section 16.76.</p> <p>Recommended action: we recommend you include the above information within supporting paragraph 16.76.</p> <p>Part J states that <i>‘In addition, in line with the requirements of the Thames Estuary 2100 Plan, developments adjoining the River Thames must maintain and where necessary enhance or raise flood defences (or show how they could be raised in the future), demonstrating that they will continue to provide adequate flood protection for the lifetime of the development’.</i></p> <p>We welcome that the plan references the maintenance, enhancement and raising of the flood defences in line with the Thames Estuary 2100 Plan. We would like to highlight that it is a requirement for any developments, adjacent to the tidal Thames statutory flood defences, coming forward now to raise the flood defences to the 2065 statutory level, as set out in the TE2100 Plan, rather than only supplying a future raising strategy, as we have previously accepted. This is because the development must be protected for its lifetime which, in most cases, would reach 2065. Whilst we would still accept a future raising strategy for how a flood defence could be raised to the 2100 statutory level, we would also recommend the defences are raised to this higher level now as part of the development rather than later. This is because of the multiple benefits that can be achieved for placemaking, biodiversity and flood risk should this flood defence crest level be considered in the design. Please see our section on the ‘Riverside Strategy Approach’ below for further information.</p> <p>Recommended action: We strongly recommend that Policy 8 Part J is updated to mandate flood defence raisings to the statutory 2065 flood level for developments adjoining the tidal Thames statutory flood defences.</p> <p><i>Please note we have some comments about basements and flood defences included within Part K. [See comment 726]</i></p>	<p>The Council has made a change to Policy 8 J so that it now reads: “In addition, in line with the requirements of the Thames Estuary 2100 Plan, developments adjoining the River Thames must maintain and where necessary enhance or raise flood defences to the 2065 statutory level as set out in the TE2100 Plan (or show how they could be raised in the future), demonstrating that they will continue to provide adequate flood protection for the lifetime of the development.”</p>
724	George Goodby, Environment Agency	Policy 8 – Flood Risk and Sustainable Drainage (Strategic Policy) - Riverside Strategy Approach	<p>Although you have made considerations for enhancing the riverside in Richmond, the TE2100 Plan’s Riverside Strategy Approach (RSA) has not been mentioned. We understand that you are applying for funding to lead a joint approach with other London Boroughs on the RSA so it would be prudent to include it within your own local plan. As Richmond has the longest frontage with significant stretches of tidal defences along the River Thames of all the London boroughs, there are substantial opportunities to improve the riverside when the defences are raised, repaired or replaced. The RSA promotes the multibeneficial outcomes that defence raising strategies, with the potential to improve public spaces, access, and to create new habitats in line with your vision. This is referred to in the TE2100 Plan as the Riverside Strategy Approach, we have produced a guidance note (attached). [See Appendix 7 for guidance note]</p> <p>We have also attached the London Borough of Richmond upon Thames’ TE2100 Council Briefing [See Appendix 7 for briefing] and will stress the importance of the document, as it outlines our requirements for the area and also contains wording which may be transferred into this local plan.</p> <p>We note that the City of London published their Riverside Strategy in November 2021 which may be useful. Please find it available at: City of London Riverside Strategy</p> <p>We would be happy to discuss this approach with you in more detail if you would like.</p> <p>Recommended action: We strongly recommend you include promotion of the Riverside Strategy Approach for the benefits to flood risk, placemaking and biodiversity that it can achieve within the Local Plan, including within Policy 8 Part J.</p>	<p>Comments noted.</p>
725	George Goodby, Environment Agency	Policy 8 – Flood Risk and Sustainable Drainage (Strategic Policy)	<p>Supportive paragraph 16.75 states <i>‘Natural flood management methods should be employed in development proposals due to their multiple benefits including increasing flood storage and creating leisure areas and habitat’.</i> We recommend that you include reference to the fact that flood defence maintenance, improvement and raising work can also provide multiple benefits. For example, the following wording could be added to Paragraph 16.75: <i>‘There is the potential to achieve significant improvements when undertaking flood defence work, including improved public spaces, access to the river and the Thames Path, and the creation of new habitats’.</i></p> <p>Recommended action: Add reference to the multiple benefits that flood defence works can achieve to supportive paragraph 16.75.</p>	<p>The Council agrees with the comment made and has made a change to paragraph 16.75 of the supporting text so that it reads; “Natural flood management methods should be employed in development proposals due to their multiple benefits including increasing flood storage and creating leisure areas and habitat. There is the potential to achieve significant improvements when undertaking flood defence work, including improved public spaces, access to the river and the Thames Path, and the creation of new habitats.”</p>
726	George Goodby, Environment Agency	Policy 8 – Flood Risk and Sustainable Drainage (Strategic Policy) Part K – Basements in areas of Flood Risk	<p>Whilst the requirements for basements in tidal flood zones as set out in Table 16.4 is exemplary, it is stronger than the Environment Agency position that we hold consistently across the tidal Thames. Our current position for areas of tidal flood risk is that bedrooms at basement level are acceptable if access thresholds and / or a permanent fixed barrier is installed at or above the appropriate breach flood level. As per our current approach, we may not recommend refusal if the development is contrary to the policy requirements, however we will highlight the policy in our responses for the case officer to review themselves.</p> <p>Recommended action: For information only, no action required.</p> <p>The header for both columns of Table 16.4 appear to have a formatting error, where the requirements for basements in Flood Zone 3b are the header for the whole table, even as it drops down the page. This may be a formatting error so a new title should be given for each column, and the Flood Zone 3b requirements should be moved down to the table contents.</p> <p>Recommended action: Review potential formatting error.</p> <p><i>Basements and flood defences</i> – New basements must be structurally independent from the flood defences, or sited outside of the zone of structural influence, whichever distance is greater. We recommend that this is added to Policy 8, Part K. This could be added within the table as <i>‘Basements and flood defences - New basements must be structurally independent from the flood defences, or sited outside of the zone of structural influence, whichever distance is greater’.</i></p> <p>Recommended action: Add information on basements and flood defences to Policy 8, Part K.</p>	<p>With regard to the first comment, this is noted.</p> <p>The Council has made a change to Table 16.4 so that the header for the first column reads ‘flood zone where the basement is located’ and the header for column two reads ‘Guidance that developments should follow’. The guidance for flood zone 3b has been shifted into the main section of the table.</p> <p>The Council has made a change to Table 16.4 so that an additional row has been added. This includes the information for basements and flood defences which reads; “New basements must be structurally independent from the flood defences, or sited outside of the zone of structural influence, whichever distance is greater.”</p>
727	George Goodby, Environment Agency	Policy 8 – Flood Risk and Sustainable Drainage (Strategic Policy) Part L – Climate change allowances	<p>Whilst commendable, using the upper end allowance for fluvial flood risk is not in line with the climate change guidance on the gov.uk website. Please refer to https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances. In the majority of cases, the central allowance is only required to be assessed.</p> <p>The London Borough of Richmond falls partially within the ‘London’ management catchment and partially within the ‘Maidenhead and Sunbury’ management catchment. For the London catchment, the central allowance is 17% and the upper end</p>	<p>The Council agrees with the comment and has removed the reference to our SFRA and instead changed the paragraph so it reads; “In line with the recommendations set out in the Council’s Strategic Flood Risk Assessment, Submitted FRAs should have to utilise the ‘central’ climate change scenarios when implementing the climate change allowances for surface water and fluvial flood risk. Assessments of</p>

			<p>allowance is 54%. For the Maidenhead and Sunbury catchment, the central allowance is 35% and the upper allowance is 81%. The upper end allowance is considerably higher for both catchments and may result in mandating considerably higher flood levels to be taken into account for designs.</p> <p>Whilst we would support this stance, similarly to our approach to basements as discussed above, we may not be able to review Flood Risk Assessments (FRAs) in line with your policy and would instead review FRAs against the gov.uk guidance. This is to maintain consistency across the Environment Agency. We will endeavour, however, to flag this policy requirement in our responses to case officers, where possible.</p> <p>We would like to highlight, however, that a case officer may not have the ability to review whether an FRA has assessed the upper end climate change allowance. For example, they may not have experience of using the gov.uk guidance to determine the correct upper end climate change allowance percentage; they may not have access to what this modelled flood level is; and they may not be experienced in assessing whether level-for-level and volume-for-volume compensatory flood storage has been provided on site to this higher level. Therefore, we would encourage you to consider the practical implications of implementing this policy requirement.</p> <p>We would also like to highlight that those applicants using the current gov.uk guidance for climate change allowances sometimes struggle to set their finished floor levels to the current required heights. This is because they may need to be set substantially above the existing ground level which can cause conflicts with urban design and accessibility. If the council wishes applicants to use an even higher flood level, using the upper end climate change allowance, this may cause further contradictions and should be considered in deciding whether to implement this policy. There may be significant push back from developers and we would recommend that if you pursue this requirement that you provide sufficient justification and evidence for it, especially since the gov.uk guidance uses the latest evidence and data to support its recommendations.</p> <p>Recommended action: We strongly recommend that you consider the practical implications of this policy requirement before deciding to pursue it.</p> <p>We also note that since the publication of the SFRA, the climate change guidance was updated on gov.uk. The SFRA, and Sequential Test Report, mentions the 2016 climate change guidance, however, the latest guidance was published on 6 October 2021. We recommend that you consider updating the SFRA and any other documents with the latest guidance.</p> <p>Recommended action: We recommend you update any reference to the 2016 climate change allowances guidance to the most up to date 2021 climate change guidance.</p>	<p>tidal flood risk should use the current TE2100 crest levels guidance and breach modelling to account for worst-case scenarios.”</p>
728	George Goodby, Environment Agency	Policy 8 – Flood Risk and Sustainable Drainage (Strategic Policy) - Sequential Test and Local Centres (Paragraph 16.56)	<p>We note that following previous discussions during our SFRA engagement that you have adopted your own Sequential Test approach for development in town centres and local centres within the borough.</p> <p>We would like to take this opportunity to remind you of national guidance relating to the Sequential Test. Paragraph 019 of the Flood Risk and Coastal Change Planning Practice Guidance (PPG) states that purpose of the Sequential Test is to ensure that areas with the least risk from flooding are developed in preference to areas at higher risk. Paragraph 020 goes on to state <i>‘the Sequential Test should be applied to the whole local planning authority area to increase the possibilities of accommodating development which is not exposed to flood risk’</i>. This is to give as many opportunities as possible to build in Flood zone 1. The proposed stance of not requiring the Sequential Test, subject to certain criteria for the 800m buffer zone around town and local centres, will restrict the ability to move development to lower risk flood zones. Paragraph 020 also states that <i>‘more than one local planning authority may jointly review development options over a wider area where this could potentially broaden the scope for opportunities to reduce flood risk’</i>. It removes the requirement of the Sequential Test, rather than broadening its search criteria. Therefore, the effectiveness of the Sequential Test, a tool to ensure areas of least flood risk are developed as a preference, is weakened and may lead to high risk flood zones being developed where alternative appropriate sites may have been available in other parts of the borough.</p> <p>We advise that if this local Sequential Test methodology is taken forward then we would advocate for minimizing the buffer zone as much as possible. This will increase the number of sites that must apply the Sequential Test and therefore maximizes the possibility for development to be located elsewhere in areas at lower risk of flooding.</p> <p>The Environment Agency is not responsible for objecting to or endorsing a certain Sequential Test method as responsibility lies with the Local Planning Authority and your case officers to assess its implementation. Our role is to highlight the national policy and provide guidance on the risks and how this may impact development and flood risk at a local level.</p> <p>Recommended action: We recommend you consider the impacts of your Sequential Test approach in general and to consider minimising the buffer zone as much as possible.</p> <p>Please refer to our sustainability appraisal section for further comments on the Sequential Test approach.[See comment 224]</p>	<p>The Council notes the comments made by the Environment Agency, however due to reasons set out in the Spatial Strategy of our Local Plan, the Council will encourage higher density development in more sustainable locations and therefore we intend to retain the approach and wording set out in this policy regarding our own sequential test.</p>
729	George Goodby, Environment Agency	Additional comments – Flood Risk Activity Permit requirement	<p>The Flood Risk and Sustainable Drainage Policy and supporting text does not reference the requirements for an Environment Agency Flood Risk Activity Permit (FRAP), which may be required in addition to planning permission in some locations. We recommend that the supporting text references this to make applicants aware of other permissions they may need. Please see the following standard wording that may be useful:</p> <p>“The Environmental Permitting (England and Wales) Regulations 2016 require a permit or exemption to be obtained for any activities which will take place:</p> <ul style="list-style-type: none"> • on or within 8 metres of a main river (16 metres if tidal) • on or within 8 metres of a flood defence structure or culverted main river (16 metres if tidal) • on or within 16 metres of a sea defence • involving quarrying or excavation within 16 metres of any main river, flood defence (including a remote defence) or culvert • in a floodplain more than 8 metres from the river bank, culvert or flood defence structure (16 metres if it’s a tidal main river) and you don’t already have planning permission 	<p>The Council has amended paragraph 16.78 – see comment 723 above for further details.</p>

			<p>For further guidance please visit https://www.gov.uk/guidance/flood-risk-activities-environmental-permits or contact our National Customer Contact Centre on 03708 506 506 (Monday to Friday, 8am to 6pm) or by emailing enquiries@environment-agency.gov.uk.</p> <p>The applicant should not assume that a permit will automatically be forthcoming once planning permission has been granted, and we advise them to consult with us at the earliest opportunity”.</p>	
730	George Goodby, Environment Agency	Policy 8. Flood Risk and Sustainable Drainage (Strategic Policy) - Sustainable Drainage, Flood Defences	<p>Sustainable Drainage Where feasible, SuDS should incorporate above ground features that are designed to maximise their ecological and aesthetic value and improve water quality. Any outfalls should be via open flow routes that have minimal impact on the receiving watercourse.</p> <p>Flood Defences There should be an emphasis on working with natural processes to reduce the risk of flooding. Examples include using soft engineering approaches to bank protection works on the River Thames wherever possible, which would provide multiple benefits for flood alleviation, biodiversity and helping watercourses achieve good ecological potential under the requirements of the WFD.</p> <p>We are pleased to see a requirement for 16 metre buffer zones for the Tidal Thames and 8 metre buffer zone for other main rivers (including fluvial sections of the Thames) has been included. However, this should acknowledge the multiple benefits of undeveloped river buffer zones, including the benefits for biodiversity and efforts to achieve objectives under the WFD. Please see our comments on Policy 40 in this section for further information and guidance on what we would wish to see in an undeveloped river buffer zone policy. [See comment 992 on Policy 40]</p>	The Council notes the comments made in regard to sustainable drainage and flood defences.
731	George Goodby, Environment Agency	Policy 8 – Flood Risk and Sustainable Drainage (Strategic Policy) Additional comments – multiple benefits and interconnected issues	<p>Flood risk management requirements, such as setting back developments from main rivers and flood defences and promoting a Riverside Strategy Approach, can deliver multiple benefits, not just in terms of flood risk through better protection and increased storage but also biodiversity improvements and improvements to the public realm. We would support the planning policies cross-referencing each other to greater identify the connectivity between the points. For example, Policy 8 Flood risk and Sustainable Drainage and Policy 40 – Rivers and River Corridors should both promote this message. Similarly, as flood defences are located along river corridors it is important that applicants reading policy 40 do not miss out on key messages stated in Policy 8.</p> <p>Recommended action: We recommend enhancing the plans emphasis on the multiple benefits that can be achieved through design for flood risk, biodiversity, access to the river and public realm for example.</p>	The Council has added a sentence to paragraph 16.75 of the supporting text which reads; “Natural flood management methods should be employed in development proposals due to their multiple benefits including increasing flood storage and creating leisure areas and habitat. There is the potential to achieve significant improvements when undertaking flood defence work, including improved public spaces, access to the river and the Thames Path, and the creation of new habitats. Development should where possible seek to implement those measures set out in Policy 40. Rivers and Corridors when mitigating flood risk.”
732	George Goodby, Environment Agency	Policy 8. Flood risk and sustainable drainage (Strategic Policy) – Paragraph 16.63 in relation to islands and functional floodplain designations	<p>Paragraph 16.63 of the Draft Local Plan states that <i>‘The borough contains a number of islands in the River Thames. Where the access and egress to and from the island is within the functional floodplain, for the purposes of new development, such islands will be considered and treated as functional floodplain (Zone 3b), even if parts of the islands may be within an area of lower probability of flooding’.</i></p> <p>We would like you to clarify what you consider to be in the functional floodplain for this definition. In the past, we have highlighted that even structures that are elevated (e.g. on raised platforms or stilts) above the 1 in 20 modelled flood level are still within the functional floodplain. This has been supported at an appeal by the inspector (For example ‘The Barge Dock, Kingston’; LPA ref: 18/12421/FUL; PINS ref: APP/Z5630/W/19/3231378; dated January 2020). Similarly, during pre-application discussions for the Twickenham Riverside development, you recently supported us in this stance where a pub raised above the flood level on stilts was proposed partially in the functional floodplain. If you support this stance, then paragraph 16.63 should be reworded to reflect this as currently surely all access and egress to and from any island would pass over the main river channel itself and therefore be partially within the functional floodplain. Perhaps the wording should be updated to <i>‘Where the access and egress route to and from the island begins within the functional floodplain...’</i> or <i>‘Where the access and egress route to and from the island would be submerged in a 1 in 20 flood event...’.</i></p> <p>Recommended action: We recommend you clarify the wording in paragraph 16.63 regarding functional floodplain and island sites.</p> <p>If the access and egress to and from any island is considered to be within the functional floodplain, and therefore the island is considered to be wholly within the functional floodplain, then only water compatible development or essential infrastructure (subject to the Exception Test) would be permitted. For example, if the access and egress to and from Platts Eyot is considered to be within Functional Floodplain, then residential development should not be permitted on the island as promoted within Site Allocation 2 if required for viability. In order to determine whether the island should be considered as functional floodplain, more details would need to be confirmed. For example, comparing a detailed topographical survey against the 1 in 20 flood level and giving details about the safe access and egress route and hazard ratings, which would also support whether the Exception Test is passed. Therefore, until this work is carried out, which we would expect in a Level 2 SFRA prior to completing the Regulation 19 Local Plan, we cannot determine whether residential development would be acceptable on the island in line with Table 3: Flood risk vulnerability and flood zone ‘compatibility’ of the National PPG. This should be made clear in the Site Allocation for Platts Eyot and in Paragraph 16.36.</p> <p>Recommended action: We recommend that within any site allocations for islands that they are caveated with reference to paragraph 16.63 and reminded of Table 3 of the PPG and other flood risk policies. [See also comment 291 in relation to Platt’s Eyot Island]</p>	<p>The Council has made an amendment to paragraph 16.63 so that it reads; “The borough contains a number of islands in the River Thames. Where the access and egress to and from the island is begins within the functional floodplain, for the purposes of new development, such islands will be considered and treated as functional floodplain (Zone 3b), even if parts of the islands may be within an area of lower probability of flooding.”</p> <p>With regards to the comment around access and egress on islands and specifically Platts Eyot, there is already a reference to this in Site Allocation 2, i.e. “There is restricted access to the island and any proposed scheme will need to address the issue of providing safe access and egress in the event of flooding; this is also likely to limit the amount of residential development on the island.” In addition, the policy states that “The Council will work closely with the Environment Agency to understand the issues relating to the provision of safe access / egress to and from the island.”</p>
733	Simon Tompsett, Richmond & Twickenham Friends of the Earth	P158 Policy 8. Flood risk and sustainable drainage	<p>– seems to be focussed on preventing all flooding but certain areas of the Borough (Petersham Meadows, Old Deer Park etc) might be better to allow some flooding to defend other areas.</p>	The Council already encourages natural flood management including flood storage in areas of the functional floodplain, in combination with other measures such as SuDS and flood defences to mitigate flood risk. It is therefore not considered necessary to make any further changes.

734	Hilary Pereira, River Thames Society	Policy 8. Flood risk and sustainable drainage, p161, and separate from the issue of counting islands as within the functional floodplain p164	Another feature of Richmond is the number of Thames islands the Borough includes, even though the Richmond bank may not be the most adjacent. Richmond can claim the Brentford Aits, a strip of Lots, the flowerpot islands, Corporation, Glovers, Eel Pie, Swan, Teddington lock, Trowlock, Taggs, Ash, Garricks, and Platts Eyot. Other local islands belong elsewhere, with Chiswick, the rest of Lots, Olivers, and Isleworth falling to Hounslow; Kingston claiming Stevens and Ravens, and Elmbridge Thames Ditton and Benn's. Clarity would be helpful in the plan how the EA's general rules about limiting development within 8/16 meters of the nontidal/tidal river would apply for construction on islands, noting all the local islands with existing built development have this much closer to the water's edge. Flood defences on islands have only a local and not more general importance. [policy 8, p161, and separate from the issue of counting islands as within the functional floodplain p164]	This is noted. The references to 8 and 16 metres respectively are the general requirements. The policy allows for 'exceptional circumstances' to be demonstrated where this may not be feasible.
Policy 9: Water resources and infrastructure (Strategic Policy)				
735	Gary Backler, Friends of the River Crane Environment (FORCE)	Policy 9. Water resources and infrastructure (Strategic Policy)	We would prefer Policy 9 C 1 to be amended to state: "where rivers have been classified by the Environment Agency as <u>failing to meet 'good'</u> status, any development etc" as this is the target standard for the Water Framework Directive. We support the Plan's requirement that developers should "take action to minimise the potential for misconnections between foul and surface water networks." Delivery of these expectations will be dependent on effective inspection and sanctions regimes by the Council. We support the Plan's adherence to the Water Framework Directive requirement that "'good status' or 'good ecological potential' should be achieved by 2027." When considering applications for developments which will increase demand for water services, the Council should consider impacts on Combined Sewage Outfalls, as these are a significant and increasing contributor to sewage pollution of rivers.	The Council agrees with the proposed change and will amend Policy 9 1C so that it reads; "protect the water quality of rivers and groundwater; where rivers have been classified by the Environment Agency as having 'poor' failing to meet 'good' status, any development affecting such rivers is encouraged to improve the water quality in these areas."
736	James Stevens, Home Builders Federation (HBF)	Policy 9: Water resources and infrastructure (Strategic Policy)	<p>Parts D, E, and F of the Policy are unsound as developers, in law, have a right to connect, and accompanying this is a legal duty on companies providing water supply and wastewater services, to meet the needs of the plan-led system.</p> <p>In law, by virtue of s106 of the Water Industry Act 1991 (WIA 91), developers, including housebuilders, have an absolute right to connect to the public sewerage system. In a modern-day context this right has persisted since the Public Health Act 1936. It has also been upheld in several Court decisions since the 1950's and more recently in the Supreme Court decision (2009) in Barratt versus Welsh Water. It is accompanied by a statutory duty placed on the water industry (companies providing water supply and wastewater services) to meet the infrastructure needs of the plan-led planning system - a material requirement under s94 (1)(a)(b) of the WIA 1991.</p> <p>The duty of a sewerage undertaker pursuant to s94 is enforceable under s18 of the WIA1991 by the Secretary of State or on the direction of the Secretary of State by the Regulator (Ofwat). In addition, the duty under s94 is supplemented by the need to comply with the Urban Waste Water Treatment (England and Wales) Regulations 1994 which provide that the duty under s94(1)(b) shall include a duty to ensure that urban waste water is, before discharge, subjected to the appropriate treatment as required/influenced by other facets of environmental legislation.</p> <p>The requirements of this policy would, consequently, be contrary to the approach that has been established nationally, and in law, by placing the onus on the applicant to demonstrate capacity rather than the provider of water services to ensure that it invests to meet planned requirements as established in the London Plan 2021 and cascaded down to local authorities.</p> <p>Part G states that contributions from housebuilders might be required to pay for the provision of water infrastructure. The housebuilding industry is already required to make payments to water bodies to ensure that investment in water infrastructure is supported to meet the requirements of the plan-led system.</p> <p>It should be noted that the home building industry already provides considerable resources to water companies in the form of Infrastructure Charges as well as new assets. It is estimated, although unaccounted for officially, that Infrastructure Charges have boosted Water Companies' coffers by up to £3 billion since such levies were introduced in the early 1990s. Relevant annual accounts published by Water Companies illustrate the value of charges and assets to overall balance sheets. By way of example, Severn Trent Water reports that in the past two years it has received £116 million from developer charges in addition to £50 million worth of new assets as well as another £31.6 million from 'other charges relating to the provision of infrastructure' as developers are typically charged hundreds of pounds at various points throughout the process, including charges of around £300 for pre-planning checks on whether a connection can theoretically be made.</p> <p>We see no need for local planning policy to stipulate further payments to water companies to allow new residential development to connect. This will only divert the amount of planning gain available for other public policy goals, especially the supply for affordable housing, to subsidise the failures of the water industry.</p>	<p>The Council has amended Part D to read as follows: "New major residential and major non-residential development will need to ensure provide information that shows that there is adequate water supply, surface water, foul drainage and sewerage treatment capacity to serve the development."</p> <p>In addition, paragraph 16.92 has been amended as follows: "Many existing water mains, sewerage systems and treatment works are becoming overloaded. Water companies are responsible for ensuring that water supply, drainage and wastewater infrastructure is in place in advance of new development coming forward. A statutory duty is placed on the water industry to meet such infrastructure needs, and it is essential to ensure that such infrastructure is in place ahead of development..."</p> <p>The Council has also amended paragraph 16.93 of the supporting text to read: "Applicants for major development proposals (both residential as well as non-residential) are required to provide evidence that adequate capacity exists in the public sewerage and water supply network to serve their development in the form of written confirmation. This statement should be submitted as part of the planning application. Developers are strongly encouraged to contact the water/wastewater company as early as possible to discuss their development proposals and intended delivery programme to assist with identifying any potential water and wastewater network reinforcement requirements."</p> <p>It is not considered that any further amendments are necessary in light of the HBF's response.</p>
737	David Wilson, Thames Water	Policy 9 - General Water and Wastewater Infrastructure	<p>Thames Water seeks to co-operate and maintain a good working relationship with local planning authorities in its area and to provide the support they need with regards to the provision of water supply and sewerage/wastewater treatment infrastructure. Water and wastewater infrastructure is essential to any development. Failure to ensure that any required upgrades to the infrastructure network are delivered alongside development could result in adverse impacts in the form of internal and external sewer flooding and pollution of land and water courses and/or low water pressure.</p> <p>A key sustainability objective for the preparation of Local Plans and Neighbourhood Plans should be for new development to be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure. Paragraph 20 of the revised National Planning Policy Framework (NPPF), 2021, states: "Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for... infrastructure for waste management, water supply, wastewater..."</p> <p>Paragraph 11 states: "Plans and decisions should apply a presumption in favour of sustainable development. For plan-making this means that: a) All plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects"</p>	<p>The Council has amended Policy 9 B to read; "The development or expansion of water supply or wastewater facilities will normally be permitted, either where needed to serve existing or proposed new development, or in the interests of long-term water supply and wastewater management, provided that the need for such facilities outweighs any adverse land use or environmental impact and that any such impact is minimised as far as possible."</p> <p>The Council notes the other comments by Thames Water but does not consider that any further changes are necessary.</p>

			<p>Paragraph 28 relates to non-strategic policies and states: <i>“Non-strategic policies should be used by local planning authorities and communities to set out more detailed policies for specific areas, neighbourhoods or types of development. This can include allocating sites, the provision of infrastructure...”</i></p> <p>Paragraph 26 of the revised NPPF goes on to state: <i>“Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary....”</i></p> <p>The web based National Planning Practice Guidance (NPPG) includes a section on ‘water supply, wastewater and water quality’ and sets out that Local Plans should be the focus for ensuring that investment plans of water and sewerage/wastewater companies align with development needs. The introduction to this section also sets out that <i>“Adequate water and wastewater infrastructure is needed to support sustainable development”</i> (Paragraph: 001, Reference ID: 34-001-20140306).</p> <p>Policy S15 of the London Plan 2021 relates to water and wastewater infrastructure and supports the provision of such infrastructure to service development.</p> <p>We therefore support the section on ‘Water and Sewage Infrastructure’ in Policy 9 as it is in line with our previous representations.</p> <p>In line with the guidance in the NPPF, Local Authorities should also consider both the requirements of the utilities for land to enable them to meet the demands that will be placed upon them. This is necessary because it will not be possible to identify all the water and wastewater/sewerage infrastructure required over the plan period due to the way water companies are regulated and plan in 5 year periods (AMPs). Thames Water are currently in AMP7 which covers the period from 1st April 2020 to 31st March 2025. AMP8 will cover the period from 1st April 2025 to 31st March 2030. The Price Review, whereby the water companies’ AMP8 Business Plan will be agreed with Ofwat during 2024.</p> <p>Hence, a further text should be added to Policy 9 as follows: <i>“The development or expansion of water supply or waste water facilities will normally be permitted, either where needed to serve existing or proposed development in accordance with the provisions of the Development Plan, or in the interests of long term water supply and waste water management, provided that the need for such facilities outweighs any adverse land use or environmental impact that any such adverse impact is minimised.”</i></p> <p>In 2019/20, Thames Water pledged to reduce their net carbon emissions from their operations to zero by 2030.</p> <p>In 2020/21, Thames Water generated 23% of their own electricity needs from renewable sources including sludge, wind and solar power. Most of the renewable electricity Thames Water self-generate comes from the treatment of sewage sludge via anaerobic digestion, but we are also exploring new opportunities such as solar panels and heat recovery and these should be supported in accordance with the London Plan and NPPF 2021 which sets out at paragraph 148 that the planning system should support renewable and low carbon energy and associated infrastructure.</p>	
738	George Goodby, Environment Agency	Policy 9. Water resources and infrastructure (Strategic Policy) - Water resources and quality	<p>Water resources are critical to sustainable economic growth and housing development as well as supporting the natural environment. Increasing population and a changing climate will have an impact on water resources in the future. The local plan can help to ensure that water resources are protected and, where evidence justifies, that water efficiency measures are adopted as part of regeneration and development. The Local Plan should recognise that The London Borough of Richmond upon Thames has been classified as an area of serious water stress and that there is limited water resource availability, along with demand and supply issues as set out in Water Companies Water Resource Management Plans (WRMP’s). We do not see any mention of this classification within the Local Plan. We would refer to the following report which sets out the results of the Environment Agency’s determination of areas of water stress that took place in 2021.</p> <p>Water resource planning does not follow local authority boundaries. Planning for water resources and water supply in the emerging local plan should reflect the plans of neighbouring local councils and water company resource zones. Cross-boundary working should form part of work under the Duty to Co-operate. The process will be more effective and better informed if it involves water supply companies.</p> <p>The emerging local plan should consider the capacity and quality of water supply systems and any impact development may have on the environment, including understanding the supply and demand patterns now and in the future across the borough area. Projected water availability should take account of the impact of a changing climate. Water companies hold information and data to help with this and the council should work closely with water companies when they are producing the local plans.</p> <p>We would encourage the council to ensure the emerging local plan and major developments identify and plan for the required levels of water efficiency and water supply infrastructure to support growth, taking into account costs and timings/phasing of development. The Infrastructure Delivery Plan can help with understanding of what is needed and is therefore an important part of the evidence base.</p> <p>We support the use of water efficiency measures to reduce demand on water resources and to accommodate growth in business, housing and population requirements without the need to increase overall consumption.</p> <p>We encourage the council to use evidence and talk to the water companies to identify where new infrastructure is planned/needed to deliver the development required in the Local Plan.</p> <p>All new homes should continue to meet the mandatory national standard set out in the Building Regulations of 125 litres/person/day (l/p/d). Where there is a clear local need, councils can set out local plan policies requiring that new dwellings meet the tighter Building Regulations optional requirement of 110 l/p/d (as set out in the Planning Practice Guidance), due to the area being designated Water Stressed and the limited water availability within our catchments we would be seeking Local Authorities to apply 110l/p/d.</p> <p>Where a water company has an ambitious efficiency related commitment or target (as an example; Southern Water currently has a commitment called ‘target 100’: Target 100, together let’s hit target 100. (southernwater.co.uk)), we support this and it should be supported by the Local Authorities own policies. There should be a collective drive to aspire for greater water efficiency</p>	<p>Policy 6 of the Local Plan sets out the required standards for water efficiency, and therefore it would not be appropriate to repeat this within both policies. In addition, the supporting text to Policy 6, at paragraph 16.37, already refers to the fact that the area is ‘seriously’ water stressed. No further changes are therefore considered necessary.</p> <p>The Councils note the comments regarding water infrastructure to support growth. This is addressed as part of the Council’s Infrastructure Delivery Plan.</p>

			<p>standards. The National Framework report sets out what is required to see greater ambition on water efficiency. In the report, the agency set out that we expect the regional water resources groups (therefore water companies) to contribute to a national ambition to reduce individual water use.</p> <p>The South East is an area under “serious” water stress. In addition, the Environment Agency’s assessment of water availability and the impacts of existing abstraction on the aquatic environment in the area shows most of the catchments are heavily abstracted with unsustainable abstractions occurring to the detriment of the environment.</p> <ul style="list-style-type: none"> • This means that there is limited environmental capacity locally to support further abstraction to meet demand from new development and therefore Local Authorities must ensure sufficient water efficiency measures are built into their core strategy polices. Increasing resource availability therefore needs to focus on optimising the use of existing resources. To do this, development in this area will require the highest level of water efficiency activity and therefore more stringent water consumption targets than those set out by Building Regulations, which may be adequate for other parts of the country. • Water Companies’ Water Resource Management Plan (WRMP) - The water companies are required to produce Water Resource Management Plans which set out the long-term (25 year) balance between increasing demand and available supply. On the basis that Water Companies are having to put forward options to meet future demand i.e. reservoirs, development of ground sources, demand management, all adds to the evidence - demonstrating current resources are not adequate to meet future demand (see individual Water Company websites for WRMP). It is up to Government, Local Authorities, water companies, the Environment Agency, Ofwat, and all stakeholders, to help and encourage people and businesses to use water more efficiently. • When Local Authorities and developers are planning sustainable growth, it is a useful exercise to carry out a water cycle study. A water cycle study can inform wider local planning policy requirements. 	
739	George Goodby, Environment Agency	Policy 9. Water Resources and Infrastructure (Strategic Policy) -Water Quality	<p>We are pleased to see the plan acknowledges the importance of protecting rivers for water quality and states a desire to improve these waterbodies. None of the WFD Waterbodies within the borough achieve good ecological status/potential. Mention should be given to how this can be achieved, for example through river restoration projects and soft engineering approaches to bank protection.</p> <p>We would encourage the council to produce a supplementary advice note for developers who are undertaking bank protection works in Richmond upon Thames. We would be happy to assist in the production of this advice.</p> <p>The use of hard engineering techniques is a specific local issue that we commonly see when responding to planning applications within the Borough. Engineered river channels are one of the most severe examples of the destruction of ecologically valuable habitat.</p> <p>We seek to restore and enhance watercourses to a more natural channel wherever possible. We aspire to return currently engineered riverbanks to a more natural state where possible. This has multiple benefits in that, as well as improving the geomorphology of the river and providing habitat for wildlife, it increases flood storage and provides aesthetic value.</p>	<p>A cross-reference to Policy 8 and Policy 40 is included at paragraph 16.90 to read: “Therefore, developments adjacent to, or with the potential to affect, these rivers are encouraged to include measures such as managing the run-off or improving surface water outfalls, in order to improve their water quality. A flood risk activity permit may need to be submitted to the Environment Agency (see Policy 8 and Policy 40 of this Plan).”</p> <p>The Council welcomes the support offered by the EA; however, some of the matters raised are outside of the scope of this Local Plan.</p> <p>The Council notes the comment regarding the preference for riverbanks to be soft engineered. The Council has amended paragraph 16.76 of the supporting text of policy 8 to read; “The protection of people, properties and infrastructure from the risk of fluvial and tidal flooding is essential in this borough and the integrity of the flood defence infrastructure must therefore be maintained. Flood defence infrastructure includes formal and informal flood defences and such defences may not always be recognisable and can include mounds, buildings and walls. The Council encourages the return of currently engineered riverbanks to a more natural state where this is possible...”</p>
740	George Goodby, Environment Agency	Policy 9. Water resources and infrastructure (Strategic Policy)	<p>We welcome the inclusion of this policy unit. With reference to Water Quality we wish to note that other policies will be relevant in order to protect these supplies – such as those relating to land contamination (as historic contamination in land can lead to discharges of polluting substances to rivers and groundwater), and those relating to surface water drainage systems (as inappropriate drainage to ground for example can cause groundwater pollution).</p> <p>We would like to see the requirements for construction sites to include strict adherence to the regulatory position statements regarding dewatering. Each construction plan should contain specific details of how these requirements have been incorporated into the build plan:- https://www.gov.uk/government/publications/temporary-dewatering-from-excavations-to-surface-water</p> <p>In addition, we would like to see within the construction method statements specific details of how silt/site run-off will be managed e.g protection of roadside drainage from silt ingress. In this way pollution of surface water via the surface water/road drainage network can be eliminated/reduced. This is particularly important in relation to any developments in close proximity to the important Water Framework Directive watercourses within Richmond.</p> <p>Each construction plan should include a specific section noting whether any site activity requires a Flood Risk Activity Permit.</p>	<p>An additional requirement has been added to Policy 9 C so that it reads: “4. demonstrate within a Construction Management Plan that there will be no potential contamination of surface or ground water (see Policy 53).”</p> <p>A change is proposed at paragraph 16.91 of the supporting text so that it reads: “Some local surface water and groundwater bodies in the gravel aquifer are hydraulically connected. Potentially contaminative uses will be directed away from locations that are sensitive in terms of groundwater and surface water receptors in order to protect the surface water courses and groundwater quality in the borough’s aquifers. So that possible contamination into local surface water and groundwater bodies does not occur, development proposals may require an environmental permit if construction sites are dealing with the discharge of liquid or wastewater.</p> <p>With regards to silt/site run-off, the Council already states in paragraph 16.90 of the supporting text that “developments adjacent to, or with the potential to affect, these rivers are encouraged to include measures such as managing the run-off or improving surface water outfalls, in order to improve their water quality.” No amendments have been made with regards to this comment.</p> <p>The Council has made an amendment to paragraph 16.90 of the supporting text so that the latter section of the paragraph reads; “...Therefore, developments adjacent to, or with the potential to affect, these rivers are encouraged to include measures such as managing the run-off or improving surface water outfalls, in</p>

				order to improve their water quality. A flood risk activity permit may need to be submitted to the Environment Agency (see Policy 8 and Policy 40 of this Plan)."
-		Delivering new homes and an affordable borough for all		
741	Jon Rowles	Delivering new homes and an affordable borough for all	The Town and Country Planning Association state that 20-minute neighbourhoods without adequate social housing is just gentrification. Richmond has delivered the lowest level of housing in London in recent years – and the outlook is the same. The existing housing associations operating in the borough have a limited ability to build more housing due to the size of their estate and increasing numbers much further would push them above prudential levels. If there is to be a step-change in the volumes built the council would have to attract new housing associations to the borough or have to start building council houses (the Richmond and Wandsworth joint service builds and manages council housing for Wandsworth so the expertise is on hand). Housing Associations also charge higher rents than the equivalent council house on average. I do not understand why Richmond is so reluctant to help the neediest members of our society, by not focusing on housing delivery that results in the lowest rents. The lack of social housing also means that new tenants no longer have lifetime tenancies and therefore have much less security and face the prospect of being forced to move as they get older, either into a smaller flat or pushed out of the sector altogether and into the private sector. I feel this coalition government austerity measure (designed to make life less comfortable for those in receipt of state assistance) needs to end and the social housing tenants should be getting lifetime tenancies.	Policy 11 seeks mixed and balanced communities and recognises that affordable homes are important to local communities. Additional wording has been added to refer to Living Locally in that policy; see also response to comment 765. The Council has set an ambitious target for 50% of all housing delivered in the borough to be affordable housing over the plan period, and Policy 11 seeks to maximise delivery of genuinely affordable housing. The supporting text refers to social rented homes as the priority. The specific mechanisms for affordable housing delivery are beyond the remit of the Local Plan. As a large scale voluntary transfer (LSVT) authority, the Council does not directly provide affordable housing. The Council's Housing Capital Programme is used to support development by Registered Providers if this assists in achieving the Council's objectives. The Council's strategic housing role is set out in the Richmond Housing and Homelessness Strategy 2021-26 and supporting policies and guidance.
742	Hannah Bridges, Spelthorne Borough Council	General comment in relation to Housing	In respect of housing, we recognise that this is a strategic and cross boundary issue. Officers acknowledge that like Spelthorne, Richmond is a constrained borough, and we face many similar constraints. Spelthorne is supportive of LB Richmond's plans to meet its housing target derived from the London Plan; however, every effort should be made to address housing needs in the Greater London area more widely. Whilst the Mayor of London is responsible for the overall distribution of housing need in London, we recognize that there remains a notable amount of unmet need in the Greater London area therefore further work should be undertaken to review the implications associated with this and to identify further capacity options to ensure this is met within Greater London. The emphasis on higher density development and smaller units is supported but could have implications for Surrey, since previous under-delivery in London and lack of affordable family units has added to housing pressures in Surrey districts and boroughs with associated implications for infrastructure in our areas.	Noted, and discussions on strategic and cross boundary issues continue through the Duty to Cooperate. Part A of Policy 13 allows for a mix of sizes, so while a higher proportion of small units are sought in sustainable locations, it does not set prescriptive proportions by unit size and tenure that need to be met, allowing for a site-specific assessment. Policy 11 seeks the appropriate housing mix for affordable homes to reflect local needs, informed by discussions with the Council and RPs. Overall, it is envisaged this balanced approach will enable a variety of housing needs to be met, taken with the mix in the existing housing stock. See also response to comment 746 in respect of London's housing needs.
743	Suzanne Parkes, Elmbridge Borough Council	Direction for development – new housing & development sites, Meeting demand from outside of the Borough	Thank you for consulting Elmbridge Borough Council (EBC) on the above document. It is noted that the response deadline has passed and therefore our officer comments may not be considered as a formal response to this Regulation 18 stage. I sincerely apologise for this and I hope you understand that our resources have been focused towards our own Local Plan and taking our pre-submission draft through our decision-making processes. Nevertheless, I hope you will still find our officer comments useful and will be able to reflect on these when moving forwards in your plan-preparation as well as those comments made at our meeting on 24 January 2022 to discuss our respective Local Plans and strategic crossboundary issues. Direction for development – new housing & development sites As with many other local authorities we recognise the difficulties in delivering sustainable growth and the challenge of effectively balancing competing environmental, social and economic pressures. Officers note that the target set for the London Borough of Richmond upon Thames (LBR) by the London Plan is 411 homes per annum (4,110 homes in the ten-year housing target) and, that Policy 10 'New Housing', states that the LBR will exceed the minimum strategic dwelling requirement, where this can be achieved in accordance with other Local Plan Policies. Officers note that the top end of the approximate number of units to be delivered in each area (as set out in Policy 10) equates to 4,800 dwellings and, that the details of the sites are set out in the latest Authorities Monitoring Report (AMR) 2019/20. However, for greater transparency and certainty, it would be useful if within each of the allocations, the indicative number of units to be provided is set out. In moving forwards with your plan, should further consideration of sites and the strategic approach of the emerging Local Plan to meeting housing need change i.e. need can no longer be met, we would wish for these to be discussed with EBC as part of our on-going Duty to Cooperate meetings and in advance of any future formal public consultations. As with all our other neighbouring boroughs and districts, EBC is keen to continue working with you and other authorities to meet the identified development needs of our areas, ensuring that the best and most suitable sites are brought forward for development and that other strategic planning matters are continuously addressed with the key principles of sustainability at the forefront. Meeting demand from outside of the Borough As a neighbouring authority you will be aware of the development needs of Elmbridge Borough and the constraints to meet these including, the consideration of Green Belt. You will also be aware that EBC has taken the decision (at its Full Council meeting on 22 March 2022) to pursue a spatial strategy that will not meet its local housing need figure (as set by the Standard Methodology). In your response to our letter dated 18 October 2021, asking whether you can help assist EBC in meeting any of our potential unmet housing need, your response dated 11 November 2021, stated that: "..."At this time therefore, we do not have any spare housing capacity to meet unmet need from any other boroughs, particularly from outside London. Indeed, if we were able to meet our own future housing need and/or even exceed the London Plan target (the new target of 411 per annum is a challenging increase from the previous target of 315 per annum), as these are not applied as a cap, we would be seeking to exceed those rather than meeting another borough's need".	As paragraph 17.5 explains, the table in part B of the policy sets out the broad expected pattern of future housing land supply. The Site Allocations across the borough comprise key sites that will assist with the delivery of the spatial strategy of the Plan. The Site Allocations in the Local Plan are not prescriptive with regards to specific density or minimum/maximum housing numbers. The detailed completions and five year housing supply are set out by ward in the annual Housing AMR , including Site Allocations where relevant in any particular year. Overall, the Council has consistently taken a cautious approach to the inclusion of deliverable sites in the five year supply, in line with the NPPF and PPG, but aims to exceed the housing target on the basis of the stepped trajectory put forward in the Plan. Discussions on strategic and cross boundary issues continue through the Duty to Cooperate. The Council has confirmed we are unable to assist in meeting any of Elmbridge's unmet housing need, given the challenging housing target set by the London Plan.

			In light of your latest consultation showing that the LBR could potentially exceed the London Plan target circ. 700 homes across the 10-year plan period, I would be grateful if you could inform EBC if your position on meeting any of Elmsbridge's unmet need has changed. Further discussions regarding this point would be welcomed as part our on-going engagement.										
-		Policy 10. New Housing (Strategic Policy)											
744	Tim Catchpole, Mortlake with East Sheen Society	Policy 10. New Housing (Strategic Policy)	We note that the housing target for Barnes, Mortlake and East Sheen in the next 10 years has increased from 400-500 in the current plan to 800-900 in the Update Plan. We see this target as being met substantially from the Brewery and Barnes Hospital redevelopments and we firmly believe that any increase beyond this will put a significant strain on our physical and social infrastructure which is already at breaking point.	Noted. However, housing targets are a minimum, with the housing numbers by broad locations illustrative of the expected pattern of development, as set out in paragraph 17.5. Proposals will be assessed on how they optimise the potential of sites and the impact on infrastructure, in accordance with other policy requirements.									
745	Theresa Oddelm, The Royal Parks	Policy 10 New Housing	We note that the Borough's ten-year housing target is 4,110 homes to be completed by 2029. The number of homes to be delivered within close proximity to Richmond Park is around 1,200 and around 1,000 within close proximity to Bushy Park. This would almost certainly result in an intensification of visitors to the Parks. Capturing some of the value of these developments, through S 106 or CIL payments, would seem appropriate in this instance to help The Royal Parks ensure that the Parks can continue to cope with the resultant increase in visitor numbers and their increasing importance as open green space for residents of the Borough. It will be important for The Royal Parks to be involved further on in the plan process to ensure that development is appropriate in the context of the Parks.	Noted, although the housing numbers by broad locations are illustrative of much broader areas spread across the whole borough, and are not all in close proximity to the Parks. See responses to comments 199, 791 and 1113 in relation to infrastructure contributions.									
746	James Stevens, Home Builders Federation (HBF)	Policy 10. New Housing (Strategic Policy)	<p>The Plan aims to provide 4,110 homes over the next ten years, or an annual average of 411 dwellings per annum (dpa). It would be helpful if the Plan could specify precisely which ten years this target will operate over as the London Plan covers the period 2019/20 -2028/29 (as draft paragraph 17.1 acknowledges). We assume that the Council will aim to deliver this figure for the ten-year period following the date the plan is adopted.</p> <p>We agree that the minimum housing requirement for Richmond-upon-Thames for the next ten years should be 4,110 homes. London is treated as a single housing market area by the Greater London Authority (GLA), as para. 4.25 of the Draft Plan acknowledges, which assesses housing need for the whole of London. This overall requirement is then apportioned among the 35 local planning authorities on the basis of judgements made about capacity within each local authority. Each local authority should endeavour to deliver the housing figure allocated to it by the London Plan 2021.</p> <p>Whether this is the right figure to base the plan upon is arguable in view of the now apparent strategic shortfall in planned housing provision across London as a whole as well as the more local evidence of need.</p> <p>The Council will be aware that there is a shortfall in the supply of land for housing across the whole of London compared to the overall assessed need. The assessed need is for 66,000 homes per year for the next ten years, compared to an estimated capacity for just 52,000 homes – 40,000 homes per year on identified large or strategic sites and 12,000 homes per year on small sites that the GLA estimates should come forward each year from 2019/20.</p> <p>As described in paragraph 17.14, the Council's own assessment of housing need – the Local Housing Need Assessment 2021 (LHNA) – estimates a net annual need for 1,123 affordable rented and 552 home ownership products to be provided between 2021-2039 – figures of need well in excess of the London Plan requirement for Richmond (411 per annum).</p> <p>Housing delivery across London as a whole is also failing to keep pace with the requirements of the new London Plan:</p> <p>DLUHC Live Table 122: Net additions to the dwelling stock</p> <table border="1"> <thead> <tr> <th colspan="3">London</th> </tr> <tr> <th>Year</th> <th>2019/20</th> <th>2020/21</th> </tr> </thead> <tbody> <tr> <td>Net additions</td> <td>40,870</td> <td>37,183</td> </tr> </tbody> </table> <p>Against a requirement for 104,000 homes to have been provided in the first two years of the London Plan (52,000 x 2), London is already facing a deficit in the delivery of 25,947 homes.</p> <p>We are aware that Richmond-upon-Thames has been performing well against the delivery of its target as set by the London Plan, but as London is a single housing market, and because delivery against the overall strategic housing target is faltering, there is an argument that the Council could do more to make a greater contribution towards addressing the wider-housing shortfall.</p> <p>The Council has a greater challenge on its hands in terms of housing delivery compared to the London Plan of 2016 which only required 315 net additional home a year. Land supply is tight within the borough.</p> <p>We have reviewed the Council's <i>Green Belt, MOL, LGS and OOLTI Review</i> (August 2021). The report concludes that Green Belt, Metropolitan Open Land (MOL), and Local Green Space (LGS) perform strongly against the assessment criteria published in the NPPF. However, some of the OOLTI sites perform weakly and could be considered by the Council for release as sites for housing. The Council should also rethink its approach to development on back garden land which is generally too restrictive.</p> <p>Large sites supply</p> <p>The Plan contains few large site allocations for housing. The Plan, in the main, relies upon yields from broad areas.</p> <p>Part B of Policy 10 provides an indication of how many homes are expected in each of the broad areas. These are set out in Table 17.1 which is reproduced below.</p>	London			Year	2019/20	2020/21	Net additions	40,870	37,183	<p>The Plan period targets are set by the London Plan. Although the London Plan set the housing target for 2019/20 to 2029/30, it was not published until March 2021 and as such applies from 2021/22. See response to comment 749 on rolling forward the target beyond the Plan period, in accordance with the London Plan.</p> <p>The ten-year housing targets in the London plan are based on a comprehensive study of capacity for housing delivery using a consistent pan-London methodology. As set out at paragraph 4.1.7 the differences between borough housing targets are a reflection of the variations in the constraints and opportunities.</p> <p>The PPG sets out that the responsibility for the overall distribution of housing need in London lies with the Mayor as opposed to individual Boroughs. London as a whole is unable to meet its housing needs. Following the Examination in Public in 2019 into the new London Plan, and the Panel's recommendations for a lower target, the Secretary of State's correspondence to the Mayor of London during 2020 and 2021 recognised this shortfall. The Mayor of London was asked to start considering the next London Plan immediately and how this will meet the higher level and broader housing needs of London, and work with boroughs to exceed their housing targets. The Mayor of London also wrote to the Secretary of State on 19 March 2021, following the publication of the London Plan, setting out the recent increase in housing delivery that has been achieved as well as ambitions to deliver more homes.</p> <p>The Open Land Review sets out that the majority of the existing OOLTI meet the criteria for designation. Site 57: York House car park is not predominantly open as it is a car park, however it is part of the York House Grade II Registered Park & Garden, part of the setting to the Grade II* York House, and therefore it has not been considered for release for housing. Site 59: Harlequins Site is only proposed to remove a duplicate OOLTI designation, to correct a mapping error.</p> <p>As paragraph 17.5 explains, the table in part B of the policy sets out the broad expected pattern of future housing land supply. The Site Allocations across the borough comprise key sites that will assist with the delivery of the spatial strategy of the Plan. The Site Allocations in the Local Plan are not prescriptive with regards to specific density or minimum/maximum housing numbers. The detailed completions and five year housing supply are set out by ward in the annual Housing AMR, including Site Allocations where relevant in any particular year. Overall, the Council has consistently taken a cautious approach to the inclusion of deliverable sites in the five year supply, in line with the NPPF and PPG, but aims to exceed the housing target on the basis of the stepped trajectory put forward in the Plan.</p> <p>The approach to backgarden development has altered from the adopted Local Plan, which included a specific presumption against loss of back gardens. The</p>
London													
Year	2019/20	2020/21											
Net additions	40,870	37,183											

Area	Wards ⁽¹⁾	Approx. No of units
Richmond	South Richmond; North Richmond; Kew	1,100 – 1,200
Ham & Petersham Neighbourhood Area	Ham, Petersham and Richmond Riverside ⁽²⁾	250 - 300
Twickenham	Twickenham Riverside; St Margarets and North Twickenham; South Twickenham; West Twickenham	1,100 – 1,200
Teddington and the Hamptons	Hampton North; Hampton; Fulwell and Hampton Hill; Teddington; Hampton Wick	900 – 1,000
Barnes and East Sheen	East Sheen; Mortlake and Barnes Common; Barnes	800-900
Whitton	Whitton; Heathfield	100-200

According to this table, at best – the upper range - some 4,800 homes might materialise over the course of the Plan. At worst – the lower range - the supply might be 4,250 – a figure that just exceeds the London Plan requirement for Richmond of 4,110. Both figures – upper and lower ranges – represent a very slender housing land supply.

It is unclear how the site allocations in the areas described in chapters 6 to 14 relate to this table. However, it appears that the Council is relying to a large extent on yields, or windfall homes, from these broad areas, rather than active measures on its part to identify sites. We note, furthermore, that many of the site allocations described in the areas section are expected to provide affordable homes only.

It would be helpful if the Council spelt out in more concrete terms the number of homes expected on each of its allocated sites.

Small sites supply

The London Plan expects Richmond to supply 2,340 homes on small sites over the next ten years – that is sites of 0.25 hectares or less. This is set out in Table 4.2 of the new London Plan. This represents 57% of the Council’s overall requirement. National policy also expects local authorities to identify and allocate sites for small developments, equivalent to 10% of the overall housing supply (NPPF, para. 69). The reason for this intervention by Government is to ease the process by which small developers have to establish the principle of residential development, thereby helping with speedier delivery and increasing the number of SME developers.

London Plan Policy H2, Part B, 3) also encourages local authorities to identify and allocate small sites:
 3) *identify and allocate appropriate small sites for residential development*

Some of the allocations listed in the areas chapters of the Plan are on sites that are smaller than 0.25 hectares in size but not every site is allocated for housing in whole or in part, and the number of homes to be accommodated on many of these sites is also unclear.

It would be helpful, therefore, if the Council was able to identify and allocate more small sites across the borough to assist in the delivery of the 2,340 homes required on sites of 0.25 ha in size or less.

Other Open Land of Townscape Importance (OOLTI)

Given the slender land supply, we recommend that the Council rethinks its approach to retaining so much OOLTI. Protecting such large swathes of the borough through various designations, including OOLTI, is unjustified given the documented housing problems in London generally and Richmond-upon-Thames more specifically.

The Council’s *Green Belt, MOL, LGS and OOLTI Review* (August 2021) shows that three sites perform weakly against the criteria it has applied to assess the value of OOLTI sites. As Section 7.4 of the report summarises:
This study considered how well the existing 168 OOLTI meet the Local Plan Policy LP14 OOLTI criteria. The majority of sites were found to meet the criteria, with only three sites considered to be weakly performing.

One of these sites offers potential for being allocated for housing. This is site 57: York House car park. Site 59: Harlequins Site has some potential but as people are already living in the apartments on the site, it is highly unlikely this will be redeveloped for housing over the next ten years.

It is unclear from the Plan whether the York house Car Park site has been allocated for housing.

Back gardens

Residential development in back gardens is also a potential source of housing supply. As the report observes, designation as OOLTI does not remove permitted development rights unless such areas are also historic environment designated areas (e.g. conservation areas). New Government planning policy, however, as well as the London Plan, is keen to tap back gardens, and suburban areas more generally, as potential sources of land supply for housing.

Policy H2, Part B, 1) of the London Plan states:
 Boroughs should:
 1) *recognise in their Development Plans that local character evolves over time and will need to change in appropriate locations to accommodate additional housing on small sites*

NPPF sets out that Plans should consider the case for setting out policies to resist inappropriate development of residential gardens, for example where development would cause harm to the local area. The policy is considered appropriate, given the importance of backgardens in the borough as outlined at paragraph 17.73, with the policy enabling significant loss of garden land to be resisted unless there is no identified harm.

			<p>In contrast to this, the wording of the Local Plan policy is very much orientated towards conserving the existing character. The Council's policy on back gardens is very restrictive. Policy 15, Part B, includes many conditions while point 11 states baldly: <i>Result in no significant loss of garden land, unless in some cases a well-designed back garden development at an intimate scale with appropriate mitigation such as to improve biodiversity, accords with all the factors above and there is no identified harm to the local area.</i></p> <p>The net result of all the conditions imposed by Policy 15, Part B is to make it virtually impossible to build on back gardens, thereby neutralising the Government's objective of 'gentle densification'.</p> <p>Moreover, stipulating 'no identified harm to the local area' is a very general expression. The Council has already listed its conditions for back garden development. There is no justification for the addition of this further, vague, category.</p> <p>We recognise the political sensitivity surrounding the development of back gardens, but the Council should avoid erecting unnecessary barriers to a form of development that has the potential to increase housing delivery in the borough and assist SME developers.</p>	
747	Anna Russell-Smith, Montagu Evans on behalf of South West London and St George's Mental Health NHS Trust	Policy 10. New Housing (Strategic Policy)	<p>LB Richmond's London Plan Residential Target is a minimum of 4,110 units over the next ten years (411 units per annum). This target figure is reflected in emerging Policy 10 (New Housing – Strategic Policy). Part B of the policy goes onto set out indicative ranges for areas within the Borough with Barnes and East Sheen (for which Barnes hospital falls within) having an approx. target of 800-900 units over the next 10 years (80-90 units per annum).</p> <p>In line with London Plan Policy H1 this target is expected to be achieved through optimising the potential for housing delivery on all suitable, deliverable and available brownfield sites. It is therefore supported that, on the basis that community uses is not delivered in full or part across a site, that residential accommodation could be a suitable alternative use on this brown field, urban site and as set out above should be reflected within the policy.</p>	Noted, although the Plan should be read as a whole and the housing target does not outweigh other policy requirements.
748	Rob Cummins, RHP	Delivering new homes and an affordable borough for all	<p>Policy 10 sets out the Borough's Housing Policy, referring to the 10-year housing target for 4,110 homes. It also stated that the Council will exceed this minimum requirement. This is supported.</p> <p>Policy 10 also includes a table to provide guidance on how the new homes will be distributed across the borough. Whilst the supporting text acknowledges that the target is derived from the London Plan, the policy would benefit from a clear reference to the number of homes being a <u>net</u> target. The distinction is particularly important for Ham Close, where there are currently 192 homes on site, and the redevelopment will enable 452 homes (+260).</p>	Paragraph 17.1 is clear that the target is for net housing completions. For clarity add reference to net housing completions to the table in Policy 10.
749	Nina Miles, GLA on behalf of Mayor of London	Policy 10. New Housing (Strategic Policy)	<p>The Council's commitment in Policy 10 to exceed the borough's ten year London Plan housing monitoring target of 4,110 homes through the optimisation of all suitable and available brownfield sites is welcomed and we are pleased to note that housing delivery against the borough target is capable of being met without the release of employment land.</p> <p>We note confirmation within the Plan that the housing target can be rolled forward for future years, however this will need to be carried out in accordance with paragraph 4.1.11 from the LP2021.</p>	<p>Noted.</p> <p>The London Plan target is to 2028/29. There is the eleven year plan period from 2029/30 to 2039/40 where the housing target should be rolled forward, and as per the London Plan at paragraph 4.1.11 draw on the 2017 SHLAA findings (which cover the period to 2041) and any local evidence of identified capacity, and roll forward the housing capacity assumptions applied in the London Plan for small sites.</p> <p>For Richmond the 2017 SHLAA identified at Table 10.1 large site capacity in Phase four (2029/34) of 701 units and in Phase five (2034/41) of 164 units, a total of 865 units in this 12 year period, on average 72 units per annum. Taken with the small sites delivery of 234 homes per annum, gives 306 homes per annum. For the eleven year period this is 3,369 dwellings. In reality, it is likely a new London Plan will replace this with a new housing target before those dates are reached.</p>
750	Mark Connell, Sphere25 on behalf of Hill Residential	Policy 10 New Housing	<p>Policy 10 sets out the Borough's Housing Policy, referring to the 10-year housing target for 4,110 homes. It also stated that the Council will exceed this minimum requirement. This is supported.</p> <p>Policy 10 also includes a table to provide guidance on how the new homes will be distributed across the borough. Whilst the supporting text acknowledges that the target is derived from the London Plan, the policy would benefit from a clear reference to the number of homes being a <u>net</u> target.</p> <p>The distinction is particularly important for Ham Close, where there are currently 192 homes on site, and the redevelopment will enable 452 homes (+260).</p> <p>Table 17.1 presently refers to the Ham & Petersham Neighbourhood Area delivering between 250- 300 homes. In the context of Ham Close being able to deliver and additional 260 homes alone, and with potential development of Cassell Hospital coming forward in the medium term - the housing target is considered too low. It does not optimise the delivery of new homes in the area.</p> <p>It is considered that a net target of 300 – 350 homes is more appropriate and the table be changed accordingly</p>	<p>Paragraph 17.1 is clear that the target is for net housing completions.</p> <p>For clarity add reference to net housing completions to the table in Policy 10.</p> <p>The housing targets are a minimum, with the housing numbers by broad locations illustrative of the expected pattern of development, as set out in paragraph 17.5. The housing numbers are drawn from, and updated to reflect the latest, deliverable sites identified in the Housing AMR.</p>
751	Charlotte Orrell, DP9 Ltd on behalf of London Square Developments	Policy 10 - New Housing	<p>We support the delivery of a minimum of 4,110 new homes across the borough, particularly the 1,100 – 1,200 new homes proposed within Twickenham (noting as stated above, there appears to be an inadequate number of draft site allocations for housing within sustainable locations in Twickenham to achieve this objective). This target is in line with the London Plan target of 410 units per annum between 2019/20-2028/29. The supporting text sets out that this target is expected to be achieved, through optimising housing delivery on all suitable and available brownfield sites – with 57% expected to be delivered on small sites (234 units per annum).</p> <p>It is also noted that the borough is on course to meet and exceed the strategic dwelling requirement over a ten-year period. The Council's latest Annual Monitoring Report (AMR) 2019-2020 identifies that in that period 331 new homes were delivered, which falls short of the 410-target set by the London Plan. The supporting text of the policy goes onto note that "<i>Meeting the higher housing target in the London Plan 2021 will be a challenge, given the constraints in the borough and meeting other plan priorities.</i>" Moreover, the Council's Local Housing Needs Assessment (stage 1) (July 2021) shows that even meeting the target</p>	<p>The London Plan does not set an annual housing target, but the ten year target may be annualised for monitoring purposes.</p> <p>Although the London Plan set the housing target for 2019/20 to 2029/30, it was not published until March 2021 and as such applies from 2021/22. A stepped trajectory for delivery over a ten year period is set out in the Plan at paragraph 17.4.</p> <p>See response to comment 843 in regard to Greggs.</p> <p>Note the 1,123 is the overall calculation of affordable housing need, an unconstrained figure, calculated in accordance with the PPG, as a starting point for setting policy on affordable housing. The PPG is clear that the responsibility for</p>

			<p>of 411 homes per annum would generate a shortfall against local need (potential scale of need for 1,123 rented affordable and 552 shared ownership homes per annum). Given this housing challenge, we would encourage the Council to increase the number of draft site allocations for housing, including the Greggs Bakery site. This would reduce Council's reliance on small housing sites, which typically result in few affordable new homes and can often also become unviable due to other competing planning policy requirements, a challenging planning process and financial obligations, including the Council's proposed high rate of carbon offset payment.</p> <p>Finally, the supporting text to draft Policy 10 notes that "<i>Housing delivery against the borough target is capable of being met without the release of employment land, although there may be limited potential for enabling housing gain on employment land if proposals increase the level of existing employment floorspace.</i>" This is not demonstrated in the latest AMR available (2019-2020) and without an updated AMR for 2020-2021 to demonstrate this, this statement is not considered to be accurate and should be removed from the draft Local Plan. Moreover, as stated above, the housing target of 411 new homes per annum is a minimum requirement and at risk of under-delivery due to an over-reliance on small housing sites and by adopting such a narrow view as to the benefits of retained employment floorspace (whatever the case), rather than an assessment of site specific characteristics of that floorspace in question, and whether it could be repurposed for other more suitable and appropriate uses.</p>	<p>the overall distribution of housing need in London lies with the Mayor as opposed to individual Boroughs. As a result, the PPG states that there is no policy assumption that this level of need will be met within the individual boroughs. Accordingly, the LHNA continues to draw on the need identified in the adopted London Plan. Add further text to the Plan to explain the context for these figures, in the supporting text to Policies 2 and 11.</p> <p>Add updates to reflect the latest Housing AMR 2021/22 including the housing trajectory.</p>
752	Nick Alston, Avison Young on behalf of St George Plc and Marks & Spencer	Policy 10 New Housing	<p>Recommended Amendments</p> <p><u>Operating Period and the Housing Requirement</u></p> <p>In accordance with NPPF para 22, it is necessary for soundness that strategic policies cover the full plan period, which in this case is 15 years (the period is confirmed at para 2.1 of the draft Local Plan). Policy 10 is confirmed (in its heading) as a 'Strategic Policy' but only covers a period of 10 years. As a starting point, we recommend that this is amended to cover the full 15-year period of the plan in order to be consistent with national policy.</p> <p>In order to meet the overall housing requirement for the plan period as a whole, the 10 year housing target set by London Plan Policy H1 should be projected forward to cover the full 15 year period. Therefore we recommend that Policy 10 is amended to plan for a housing target of 6,165 homes in order to be consistent with national policy and in general conformity with the London Plan.</p> <p><u>Exceeding the Housing Target</u></p> <p>National planning policy (as expressed in NPPF para 60) is focussed on significantly boosting housing supply. London Plan Policy H1 sets minimum 'targets' for net housing completions which each local planning authority should plan for, and should be included in the Local Plan. The policy goes onto require boroughs to optimise the potential for housing delivery on all suitable and available brownfield sites through their development plans (including through the mixed-use redevelopment of low-density retail parks).</p> <p>Part A of the Policy 10 confirms that the Council will 'exceed the minimum strategic dwelling requirement' 'where this can be achieved in accordance with other Local Plan policies'. It is our view that this qualification is unnecessary and over cautious and that the policy overall should adopt a much more positive and ambitious approach to significantly boosting housing supply in the borough and optimising sites in order to accord with national policy and be in general conformity with the London Plan. This view is justified by the supply of deliverable/developable sites set out in chapters 6-14 of the Plan which appear (on the basis of our review) to have capacity to exceed the minimum 15-year target set by the London Plan on the basis of the evidence set out in the Council's Urban Design Study (see below for further explanation).</p> <p><u>Housing Trajectory</u></p> <p>In order to be consistent with national policy (NPPF para 74), a housing trajectory should be prepared and included within the plan (to be read alongside Policy 10). This should be appropriately evidenced and consistent with the specific sites and broad locations for growth set out in Policy 10 itself and elsewhere in the Plan.</p> <p><u>Broad Locations for Growth</u></p> <p>NPPF para. 68 requires Local Plans to identify a supply of specific deliverable sites for years 1-5 of the plan period and specific developable sites or broad locations for growth for years 6-10 and, where possible, for years 11-15. The draft Plan includes a series of place-based strategies with associated site allocations, each of which includes details of their expected implementation timescale (years 0-5, 5-10 or 10-15). We recommend amending these to years 1-5, 6-10, and 11-15 for the purposes of consistency with national policy.</p> <p>Part B of Policy 10 goes on to identify broad locations for growth based on wards. The use of wards is inconsistent with the place-based approach adopted by the first part of the plan. As a consequence it is not possible to effectively read/apply Policy 10 and the first part of the plan together (and therefore not possible to read the local plan 'as a whole') which is not in accordance with NPPF para 16(d). In order to be effective, the 'areas' referred to in Policy 10 should be amended to tally with the 'places' set out in Chapters 6-14 plan upon which the spatial strategy of the plan as a whole is based.</p> <p>Part B sets out a quantum of housing for each broad location. These are described as 'indicative ranges' and 'approx'. These terms are vague (not in accordance with NPPF para 16(d)) and do not firmly commit to delivering the minimum target set by London Plan Policy H1. To ensure accordance with national policy and conformity with the London Plan we recommend the figures stated should be 'targets' (with a clear intention to exceed – see below).</p> <p>In order to accord with national policy (NPPF para. 68), the 'target' amounts of new housing for each broad location set out in the table at Part B should be amended in order that they tally with the minimum 10-year housing target, and where possible the 15-year target. Our initial view is that the proposed site allocations set out in the draft plan indicate that the borough has an ample supply of specific deliverable/ developable sites to meet the 15-year housing target therefore we recommend that the amounts set out in the table at Part B of the Policy should cover the full 15-year period in order to accord with national policy and ensure soundness.</p>	<p>Noted, although the Plan should be read as a whole and the housing target does not outweigh other policy requirements.</p> <p>Add updates to reflect the latest Housing AMR 2021/22 including the housing trajectory.</p> <p>The Council has consistently taken a cautious approach to the inclusion of deliverable sites in the five year supply as detailed in the annual Housing AMR, in line with the NPPF and PPG, but aims to exceed the housing target on the basis of the stepped trajectory put forward in the Plan.</p> <p>In regard of the Site Allocations, it is not considered necessary to reflect the specific deliverable periods used for housing land supply. The Site Allocations are not prescriptive with regards to specific density or minimum/maximum housing numbers. The indication of timescales is intended to generally reflect short/medium/long term. The Housing AMR accords with the NPPF in terms of setting out by the appropriate years, for those sites which contribute to the future housing land supply.</p>

			<p>No explanation is provided in the draft policy of how the actual amounts set for each location in the table have been calculated, therefore these are not clearly justified by evidence. Our review indicates that some of the figures may be under-ambitious when considered in conjunction with the proposed site allocations and recent planning permissions. If this is the case, it would fail to accord with the national policy requirement to significantly boost housing supply nor conform with the London Plan requirement to optimise sites. To ensure soundness (justified), the figures should be clearly evidenced and revised accordingly to reflect the evidence.</p> <p>To highlight this point, an indicative/approximate range of 1,100-1,200 homes has been identified for the 'Richmond' area. There are 6 sites allocated within this area with a total site area of 8.77ha. The optimum capacity of two of these sites (Kew Biothane and Homebase) has been confirmed via planning applications, with a combined capacity of 542 homes (average density of 214 dwellings per hectare (dph)). This leaves an 'indicative' balance of 558-658 homes for the remaining 4 allocated sites which would equate to an average density of 63-75dph. These density figures appear unrealistically low when considered in conjunction with the evidence set out in the Urban Design Study (2021) including the sites' capacity for change and suitability for tall buildings. Refer to Table 8.1, below:</p> <p><i>Table 8.1 Review of Proposed Site Allocations in 'Richmond' Area</i></p> <table border="1"> <thead> <tr> <th>Site</th> <th>Site Area</th> <th>Site Capacity</th> </tr> </thead> <tbody> <tr> <td>Homebase Manor Road</td> <td>1.84ha</td> <td>453 homes (planning application ref. 19/0510 – approved by Mayor)</td> </tr> <tr> <td>Kew Biothane</td> <td>0.69ha</td> <td>89 homes (planning permission ref. 18/3310)</td> </tr> <tr> <td>Sub-total (known site capacity)</td> <td>2.53ha</td> <td>Actual capacity: 542 homes Average density = 214 dwellings per hectare</td> </tr> <tr> <td>Richmond Station</td> <td>1.96ha</td> <td>Unknown Identified in UDS as tall building zone with appropriate building heights of 7-8 storeys</td> </tr> <tr> <td>Richmond Telephone Exchange</td> <td>0.27ha</td> <td>Unknown</td> </tr> <tr> <td>Sainsbury's, Lower Richmond Road</td> <td>2.63ha</td> <td>Unknown Identified in UDS as tall building zone with appropriate building heights of 7-8 storeys</td> </tr> <tr> <td>Kew Retail Park</td> <td>3.91ha</td> <td>Unknown Identified in UDS as tall building zone with appropriate building heights of 7 storeys</td> </tr> <tr> <td>Sub-total (unknown site capacity)</td> <td>8.77ha</td> <td>Indicative range (draft Policy 10): 558-658 homes Average density = 63-75 dwellings per hectare</td> </tr> </tbody> </table> <p>In accordance with the above, our view is that the 'approx. no. of units' figures set out in Part B of Policy 10 appear too low (including specifically for the Richmond area) and should be increased to more accurately reflect the optimum capacity of sites within each area in order to be properly justified. The figures should be underpinned by evidence – SG and M&S propose to work with the Council to prepare the necessary evidence to determine the optimum capacity of the KRP site over the course of 2022 in advance of the preparation of the Regulation 19 draft.</p>	Site	Site Area	Site Capacity	Homebase Manor Road	1.84ha	453 homes (planning application ref. 19/0510 – approved by Mayor)	Kew Biothane	0.69ha	89 homes (planning permission ref. 18/3310)	Sub-total (known site capacity)	2.53ha	Actual capacity: 542 homes Average density = 214 dwellings per hectare	Richmond Station	1.96ha	Unknown Identified in UDS as tall building zone with appropriate building heights of 7-8 storeys	Richmond Telephone Exchange	0.27ha	Unknown	Sainsbury's, Lower Richmond Road	2.63ha	Unknown Identified in UDS as tall building zone with appropriate building heights of 7-8 storeys	Kew Retail Park	3.91ha	Unknown Identified in UDS as tall building zone with appropriate building heights of 7 storeys	Sub-total (unknown site capacity)	8.77ha	Indicative range (draft Policy 10): 558-658 homes Average density = 63-75 dwellings per hectare	
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753	Alice Shackleton, on behalf of The Kew Society	Policy 10 New Housing (Strategic Policy)	17.7 This aspiration/target should not be able to override designation of protected open lands and should be consistent with the requirements of Conservation Areas. These lands and Conservation Areas should, in our view, be held by the present owners as trustees for future generations. Once gone for current short-term needs and perceived needs, they are gone forever.	Noted, the Plan should be read as a whole, and the housing target does not outweigh other policy requirements.																											
754	Faye Wright, Forward Planning and Development on behalf of BMO Real Estate	Policy 10 New Housing, Paragraph 17.8	Paragraph 17.8 relates to retaining land in employment use and states that "housing delivery against the borough target is capable of being met without the release of employment land, although there may be limited potential for enabling housing gain on employment land if proposals increase the level of existing floorspace". Suggested amendment:- It is considered that the following wording should be added to this paragraph to assist with housing delivery. "if proposals increase the level of existing floorspace OR the existing commercial floorspace is not viable".	Amend paragraph 17.8 to refer to Policies 23 and 24 which set out the specific requirements around reprovision of employment floorspace.																											
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755	Faye Wright, Forward Planning and Development on behalf of BMO Real Estate	Policy 11: Affordable Housing	This policy includes the increased percentage of affordable housing for former employment sites. This states that "on all former employment sites at least 50% on-site provision and where possible, a greater proportion than 50% AH on individual sites should be achieved". The Affordable Housing SPD makes reference at paragraph 2.8.6 that "for small sites where listed buildings are subject to conversion from employment to residential, as an exception the contribution sought will be discounted". Evidence:-	This longstanding approach to listed buildings has been set out in SPD guidance, rather than in the Local Plan, as it is considered an exception to policy. Add for clarification a reference to listed buildings in the table of the sliding scale percentage requirements in the policy. In addition, note Policy 29 Designated Heritage Assets also provides the broad context for assessing proposals, including how the optimum viable use for a heritage asset is taken into account.																											

			<p>The Affordable Housing SPD makes reference at paragraph 2.8.6 that "for small sites where listed buildings are subject to conversion from employment to residential, as an exception the contribution sought will be discounted".</p> <p>Suggested amendments:- The reference to listed buildings should be also referenced in the supporting paragraphs to draft Policy 11, for clarity.</p>	
756	Tim Catchpole, Mortlake with East Sheen Society	Policy 11. Affordable Housing (Strategic Policy)	We are pleased to see a definition of affordable housing (not given in the current Local Plan). We note that the split is 70% social rent and 30% intermediate whereas it is currently 80% and 20% respectively, but there is no explanation given as to why this has changed.	Note support for the definition of affordable housing. The change in the tenure split is explained at paragraph 17.21 in the Regulation 18 Plan, and is to accord with the London Plan 2021 as Policy H6 prescribes the tenure split allowing only 40% to be determined by the borough.
757	Susan Norgan	General comments in relation to housing/affordable housing	<ol style="list-style-type: none"> 1. The general aims are worthy but the targets indicated for affordable homes appear highly optimistic. 2. How will these be financed if developers find the profit margins unattractive? 3. Will the current restrictions in Conservation Areas be respected? 	<p>The target is ambitious, to reflect the acute affordable housing crisis. The NPPF sets out that Plans should set out contributions expected from development, which should include setting out the levels and types of affordable housing provision required, and should not undermine the deliverability of the Plan. The viability of the Plan as a whole has been tested in the Whole Plan Viability Assessment (WPVA) 2023. The NPPF allows for a profit for the developer, which reflects the risks in developing and funding the scheme, and this level can be considered in site-specific viability appraisals.</p> <p>The Plan should be read as a whole, and therefore if a proposal is brought forward in a Conservation Area the design, layout, and materials should respect and respond to the historic environment and any relevant heritage assets.</p>
758	Ziyad Thomas, Planning Issues Ltd on behalf of Churchill Retirement Living and McCarthy Stone	Policy 11. Affordable Housing (Strategic Policy)	<p>Policy 11: Affordable Housing states that all new housing developments in the borough should provide at least 50 per cent of the total number of habitable rooms as affordable housing on site. This is a higher requirement than the strategic target of 50% of all new homes in London to be 'genuinely affordable' detailed in Policy H4: Delivering affordable housing of the London Plan. Moreover Paragraph 17.20 advises that the threshold approach in London Plan Policy H5: Threshold approach to applications is not applicable in the Borough as "Richmond's affordable housing need is so great and the borough has such a limited supply of major sites, using the threshold approach would have a detrimental impact on the Council achieving its goal of providing 50% affordable housing across the borough."</p> <p>Disappointingly the Regulation 18 consultation is not supported by a Local Plan Viability Assessment (LPVA) publicly available. In the first instance it is surprising that a Planning Authority would choose to publish a Local Plan without having ascertained that the policies within it are deliverable. Secondly by limiting scrutiny of the Local Plan Viability Assessment to the Regulation 19 consultation the Council is reducing the opportunities for comment on this, crucial, element of the evidence base. It is a less robust piece of evidence as a consequence.</p> <p>The PPG makes it clear that Local Plan process is a collaborative process stating that 'It is the responsibility of plan makers in collaboration with the local community, developers and other stakeholders, to create realistic, deliverable policies. Drafting of plan policies should be iterative and informed by engagement with developers, landowners, and infrastructure and affordable housing providers (Paragraph: 002 Reference ID: 10-002-20190509). By limiting the opportunities for comment of the Local Plan Viability Assessment we are of the view that the Council has deviated substantially from national guidance and this could subsequently undermine the soundness of the Plan.</p> <p>It is our view that the Council should reconsult on the (Regulation 18) Local Plan with the supporting Local Plan Viability Assessment made publicly available for comment at the same time.</p> <p>We would also like to respectfully remind the Council that the viability of specialist older persons' housing is more finely balanced than 'general needs' housing and the respondents are strongly of the view that these housing typologies should be robustly assessed in the LPVA. This would accord with the typology approach detailed in Paragraph: 004 (Reference ID: 10-004-20190509) of the PPG which states that. "A typology approach is a process plan makers can follow to ensure that they are creating realistic, deliverable policies based on the type of sites that are likely to come forward for development over the plan period.</p> <p>The Local Plan is therefore considered to be unsound on the grounds the affordable housing targets are not justified, positively prepared or effective.</p> <p>Changes considered necessary: The Regulation 18 consultation is not supported by a Local Plan Viability Assessment (LPVA) publicly available. In the first instance it is surprising that a Planning Authority would choose to publish a Local Plan without having ascertained that the policies within it are deliverable. Secondly by limiting scrutiny of the Local Plan Viability Assessment to the Regulation 19 consultation the Council is reducing the opportunities for comment on this, crucial, element of the evidence base. It is a less robust piece of evidence as a consequence.</p> <p>The PPG makes it clear that Local Plan process is a collaborative process stating that 'It is the responsibility of plan makers in collaboration with the local community, developers and other stakeholders, to create realistic, deliverable policies. Drafting of plan policies should be iterative and informed by engagement with developers, landowners, and infrastructure and affordable housing providers (Paragraph: 002 Reference ID: 10-002-20190509). By limiting the opportunities for comment of the Local Plan Viability Assessment we are of the view that the Council has deviated substantially from national guidance and this could subsequently undermine the soundness of the Plan.</p> <p>It is our view that the Council should reconsult on the (Regulation 18) Local Plan with the supporting Local Plan Viability Assessment made publicly available for comment at the same time.</p>	<p>The Council considers the Plan is general conformity with the London Plan. As the threshold approach reduces the total to 35% for sites not in public ownership or industrial land, this would not impact all of the sites within the borough. However, as large-scale developable land is so scarce in the borough, coupled with the acute need for affordable rented homes, every additional affordable home is a major benefit. Large sites in the borough can sometimes struggle to even reach 35%, which can be down to a variety of factors impacting on viability such as high existing use values. This alone however shouldn't justify the need to drop the 50% target on all eligible sites; there is a need to retain flexibility but by introducing the 35% target there would potentially be a significant loss of a large quantum of affordable homes on the sites that could viably provide 50% that would have a detrimental impact on the future supply of affordable housing.</p> <p>The viability of the Plan as a whole has been tested in the Whole Plan Viability Assessment (WPVA) 2023 to inform the Regulation 19 Plan. The PPG does not prescribe the stage at which this has to be made available, and in light of limited resources by local authorities it is common and appropriate for this to be undertaken when there is some certainty about the direction policies in a draft Plan are likely to take.</p>

759	Luke Burroughs, Transport for London (TfL) Commercial Development	Policy 11. Affordable Housing (Strategic Policy)	<p>Policy 11: Affordable Housing TfL CD welcomes the policy that developments “<i>should provide 50 per cent of the total number of habitable rooms as affordable housing on site</i>”. TfL Property Development is committed to delivering 50 % affordable housing (by habitable room) across its portfolio as instructed by the Mayor. TfL have significant land holdings in the borough and look forward to working collaboratively with Islington to deliver affordable housing on appropriate sites within our ownership, in line with DLP policy H5 delivering affordable housing.</p> <p>However, policy H4 of the London Plan identifies that public sector landowners with agreements with the Mayor can take a portfolio across to delivering 50% affordable housing across public landholdings in London. TfL has such an agreement with the Mayor which provides the flexibility for more complex sites to come forward where they would be unviable providing the full 50% affordable housing requirement, whilst still providing a high level of affordable housing across all TfL landholdings. This policy should be updated to reflect the wording of London Plan policy H4 on portfolio agreements for public sector landholders.</p>	<p>Paragraph 17.20 in the Reg 18 Plan acknowledges the threshold approach and public sector or industrial land, but as stated in response to comment 758, due to the detrimental impact of the threshold approach it is not considered appropriate given the local circumstances.</p> <p>A number of Site Allocations are public sector land. While from a London-wide perspective the merits of portfolio agreements are acknowledged, with high land values and limited supply of large sites, there is a risk of undermining the few opportunities to provide for mixed and balanced communities in the borough. The affordable housing provision could end up being anywhere in London, beyond the Council’s control for nominations or monitoring. It could be that a public sector body makes the case for consideration (e.g. if there are two sites within the borough which are proposed to be linked), but this would need to be justified on a case by case basis.</p>
760	James Sheppard, CBRE, on behalf of LGC Ltd	Policy 11. Affordable Housing (Strategic Policy)	<p>5. Affordable Homes</p> <p>The adopted London Plan (March 2021) provides for a housing land supply requirement for LBRuT of 4,110 completions over a 10-year period. At a strategic level, the London-wide Strategic Housing Market Assessment (SHMA) has identified a need for 66,000 additional homes across London per annum. Indicative ranges have been included in draft Policy 10 in a range of broad areas. Within ‘Teddington and the Hamptons’, a range of 900 – 1,000 new homes have been stated.</p> <p>Notwithstanding paragraph 17.5 of the draft Local Plan that summarises the findings of the latest housing Annual Monitoring Report (November 2020), setting out that the borough is forecast to meet the strategic dwelling requirement over a ten-year period, LBRuT continues to suffer from a fundamental and longstanding under provision of affordable homes.</p> <p>To successfully meet the Council’s draft strategic vision every avenue should be explored to ensure the delivery of these affordable homes. The Council sets out in its strategic vision that by 2039, residents will have seen the impact of delivering new homes and an affordable borough for all, with a range of affordable housing having been delivered, with a future pipeline, supporting low- and middle-income residents and workers into low-cost rent and home ownership options. Specifically, targeted strategic objectives include the “maximisation of delivery of genuinely affordable housing across the borough through a range of measures, recognising the significant community benefits as a priority, and taking innovative and flexible approaches to deliver more affordable housing to meet the needs of Richmond’s residents”.</p> <p>London plan Policy H1 sets out a range of measures that should be adopted to ensure housing targets are achieved, including for boroughs to “allocate an appropriate range and number of sites that are suitable for residential and mixed-use development and intensification”. This is considered pertinent to the Council’s significant affordable housing deficit. Policy H1 goes on to require boroughs to optimise the potential for housing delivery on all suitable and available brownfield sites through Development Plans, especially through sites with PTALS 3-6, or within 800m of a station or town centre boundary, and on industrial sites that have been identified through the processes as set out in Policies E4, E6 and E7. The potential of co-location of uses through Policy E7 has been explored above.</p> <p>Paragraph 17.12 confirms the borough’s affordable housing delivery challenge, stating “due to the scarcity of land in the borough and other factors it is now experiencing an acute affordable housing crisis. Not enough affordable housing is being built to help alleviate the ever-growing need. Therefore, the Council will do everything in its power to make sure over the plan period we hit the 50 per cent target”.</p> <p>It follows therefore, that every possible option should be explored to ensure affordable homes are provided. This should include for a balanced approach to mixed-use development, whilst ensuring no-net loss of employment floorspace, as prescribed in policies 21, 23 and 24. Paragraph 17.14 illustrates the strength of need still further by stating “the need for affordable housing in the borough is demonstrable, which has been evidenced by the Council’s Local Housing Need Assessment 2021 (LHNA). The LHNA estimates a net annual need of 1,123 affordable rented and 552 home ownership products to be provided between 2021-2039. This is significantly higher than Richmond’s overall annual housing target of 411 homes per annum during the current London Plan period (2019-2041)”. Paragraph 4.4.5 of the London Plan 2021 confirms that the London SHMA identifies that 65 per cent of London’s need is for affordable housing.</p> <p>There is clearly a critical, pressing need for delivery of affordable homes in the borough, to provide for the housing needs of residents and communities within Teddington, wider Richmond and Greater London.</p> <p>One of the key issues that will serve to stifle future affordable housing delivery is that a such a large proportion of the Council’s forecast housing delivery stems from the delivery of small sites. The London Plan Table 4.2 confirms the large proportion of Richmond’s 10-year housing target predicated on net housing completions on small sites as being 2,340. Affordable housing is very often difficult to provide on-site, as part of small site development. This often manifests in Payments in Lieu (PiL). Given the lack of available land to develop new affordable housing, PiL cannot easily and readily contribute to relieving the affordable housing crisis. The comprehensive development of larger sites is a tangible and effective way of delivering on site affordable housing, in locations where affordable housing is most needed. The risk of such a reliance on small sites and PiL, is that this is far less effective than providing strong provision, ‘on mass’, as part of larger site redevelopment.</p> <p>In addition, importantly, paragraph 17.8 of the draft Local Plan notes there is a need to retain land in employment use but goes on to concede that “there may be limited potential for enabling housing gain on employment land if proposals increase the level of existing employment floorspace”.</p> <p>The site has the potential to offer a policy compliant level of affordable housing, which for employment sites is considered to be 50%, despite there being no proposed loss of industrial capacity on site.</p>	<p>The affordable housing target is ambitious, to reflect the acute affordable housing crisis in the borough.</p> <p>The Local Plan recognises, in the strategic objectives and Policy 11, the significant community benefits of affordable housing as a priority. However, the Local Plan also sets out other priorities, to cater for economic, social and environmental objectives as required by the NPPF. In particular this includes that significant weight should be placed on the need to support economic growth and productivity, and that planning policies should plan to meet for economic needs. The Local Plan does not set out that affordable housing needs outweigh other policy requirements, as it is for the benefits and harm of any proposal to be weighed up on a site-specific basis.</p> <p>The reliance on small sites is due to the nature of the borough – in many years only a handful of large site applications are determined, as set out in Housing AMRs. Financial contributions made to the ringfenced Affordable Housing Fund are allocated to the Council’s Housing Capital Programme and used to help fund new affordable housing, or to fund acquisition of land and private properties for this purpose, or for enhanced provision through re-modelling existing affordable units or supported schemes, in pursuance of housing and planning objectives. While on-site affordable housing provision is the preference, financial contributions play a role in increasing delivery.</p>

			Boroughs should be identifying and seeking to enable additional development capacity to supplement targets, thereby realising the true potential of brownfield housing capacity. The adopted London Plan makes it clear that making the best use of land means directing growth towards the most accessible and well-connected places. Policy GG2 of the London Plan 2021 specifically directs the proactive exploration of potential to intensify the use of land to support additional homes and workspaces. This would involve the promotion of higher density development, particularly in locations that are well-connected to jobs, services, infrastructure and amenities by public transport, walking and cycling.	
761	Anna Russell-Smith, Montagu Evans on behalf of South West London and St George's Mental Health NHS Trust	Policy 11. Affordable Housing (Strategic Policy)	Emerging Policy 11 (Affordable Housing - Strategic Policy) Part F states 'Site specific viability information will only be accepted in exceptional cases, determined by the Council'. In line with NPPF paragraph 58 and London Plan viability should be required where schemes do not meet the threshold.	The viability of the Plan as a whole has been tested in the Whole Plan Viability Assessment (WPVA) 2023, which recognises the need for viability to be considered on a case by case basis, taking into account variations between private sales values, scheme composition and benchmark land value. Add to the reference in paragraph 17.23 in the draft Local Plan to considered site-specific viability.
762	Nina Miles, GLA on behalf of Mayor of London	Policy 11. Affordable Housing (Strategic Policy)	We welcome Richmond's intention to seek 50% affordable housing from residential development. However, the Mayor has set out a Threshold Approach to affordable housing delivery in Policy H5 LP2021, which is not reflected in the plan. This is likely to constitute a General Conformity Issue. The Threshold Approach seeks to limit those circumstances where viability evidence is required as part of residential planning proposals by providing the incentive for developers to achieve at least the minimum level of affordable housing to qualify for the Fast Track Route thereby avoiding scrutiny of viability at various stages of development. This should be reflected in Richmond's strategic affordable housing policy. Affordable housing data from London Plan AMR shows Richmond as having an average of 14% completions over the three years 2016/17 to 2018/19 and -3% for approvals in 2018/19 (although this rises to 0% when counted by number of bedrooms). Therefore, the Mayor cannot currently support Richmond's approach to affordable housing contributions, particularly when this is not supported by viability evidence or historical delivery rates.	See response to comment 758. In the borough context, the importance is to attain the right type of affordable housing, to meet local priority needs, rather than a quantum of affordable housing which has less impact by not providing genuinely affordable properties. This was recognised by the Mayor of London in the refusal of the call-in application at the Stag Brewery where the public benefits of additional affordable housing were limited, and not considered by the Mayor enough to outweigh the harm to a number of other policy areas. The Council has identified a pipeline of initiatives that could see up to 500 affordable homes delivered over the next five years.
763	Neil Henderson, Gerald Eve on behalf of Reselton Properties	Policy 11 Affordable Housing	Policy 11, Sub Section D - Reselton welcome a balance which provides greater weight to intermediate tenure (70:30). A greater proportion of intermediate housing can often make a significant difference to the viability of a development. For example, a policy compliant approach of 70:30 may only be able to deliver 100 units of affordable housing. However, significantly increasing the proportion of intermediate to, say, 50:50, may result in a significant increase in affordable units overall e.g 140 units. This has the potential to deliver no less social rented housing but significantly more affordable housing overall. As a result it is considered there should be flexibility in the policy to allow for different tenure splits where the outcome delivers broadly the same social rent quantum but allows for a significantly greater quantum of affordable housing overall.	See response to comment 762.
764	Charlotte Orrell, DP9 Ltd on behalf of London Square Developments	Policy 11 - Affordable Housing	The draft policy indicates that all developments should deliver at least 50 per cent of the total number of habitable rooms as affordable housing on site. The policy also notes that at least 50 per cent on-site provision should be provided for all former employment sites and where possible a greater proportion than 50 per cent affordable housing on individual sites should be achieved. This draft policy is in conflict with the London Plan, where Policy H5 allows for the Threshold approach to be followed for sites which deliver a minimum of 35 per cent affordable housing, or 50per cent for public sector or industrial land. Site's which deliver the threshold level of affordable housing would be fast-tracked through the system and would not be required to provide a viability assessment. Draft Local Plan Policy 11, is clearly contrary to this since it requires a minimum of 50% affordable housing across all sites and applies a late stage review where developments for over ten homes are permitted with less than 50% affordable. Part F also states that "Site-specific viability information will only be accepted in exceptional cases". We consider this policy to be overly vague and does not provide sufficient detail to future applicants to understand how their applications would be dealt with by the Council. The Council should provide an indication of what scenarios fall into 'exceptional circumstances' so that developers can rely on a consistent approach across the borough. Furthermore, Part F is also contrary to the London Plan and paragraph 124 of the NPPF which recognises that planning policies and decisions should take account of "local market conditions and viability" among other site considerations. Site specific circumstances should therefore be taken into account through the Viability Tested Route. This is particularly pertinent to former industrial sites such as the Greggs bakery which present high costs associated with decontamination and asbestos removal which have been found within a number of buildings present on the Site. We therefore call for the re-wording of draft Policy 11 to replicate the affordable housing threshold approach in the London Plan and delete part F of draft Policy 11. The AMR (2019/2020) sets out that only 34 new affordable units were delivered in 2019/20 across the whole borough. The Local Housing Needs Assessment estimates a net annual need of 1,123 affordable rented and 552 affordable home ownership products to be provided between 2021-2039. This is significantly higher than Richmond's overall annual housing target of 411 homes per annum during the current London Plan period (2019-2041). It is questioned how the borough intends to deliver the additional affordable housing requirements which exceed their housing targets, and invalidates the Council's assertion that the borough can meet its housing need without the release of employment land, given the historical under-delivery of affordable housing within the borough. Furthermore, given the low number of affordable homes delivered within the borough, the Council need to also consider their role in bringing forward viable schemes through a careful assessment of Policy 11 and wider Local Plan policies. Given the historical challenges, the Council should not simply set a blanket '50% or nothing' approach and Policy 11 should allow for a viability tested approach (should the affordable housing thresholds not be met) in order to increase affordable housing delivery in line with London Plan (2021) policy.	See response to comment 758.

765	Martin Ellis, South West London Clinical Commissioning Group (CCG)	Policy 11. Affordable Housing (Strategic Policy)	<p>We support the policy. However, we note in paragraph 17.21 that the Council will pursue a different tenure split to the London Plan (Policy H6) in favour of affordable rent over intermediate housing products. The London Plan policy allows for flexibility to explore innovative affordable housing products to meet local housing needs.</p> <p>It is recognised that the shortage of affordable housing in London is hindering the recruitment and retention of public service workers. The National Planning Policy Framework definition of affordable housing (Annex 2) includes housing for sale or rent for essential local workers, which includes NHS staff.</p> <p>The redevelopment of surplus public sector land and buildings represents an opportunity to deliver homes that can meet the needs of essential workers and such provision could be part of the overall requirement for at least 50% affordable housing on site.</p>	<p>The Council's Housing and Homelessness Strategy 2021-26 mentions the social and economic benefit to providing affordable local housing options for LBRuT's key workers who are employed in public sector and related services, such as health and social care, that provide support to our more vulnerable residents, with a key objective to delivery a range of affordable homes that meet the needs of local residents and workers. The Council supports the London Living Rent product as a form of intermediate housing that might particularly suit working households on modest incomes who are not in a position to purchase. In addition, the Council's latest affordability criteria and priority allocation for Intermediate Housing includes keyworkers as a third priority. Add reference to this in the supporting text, and add key worker housing to the Glossary (referring to the definition in the Mayor's Housing Policy Practice Note 'Allocating intermediate homes to London's key workers').</p> <p>As well as the benefits of affordable housing that can be considered under Policy 11, innovative affordable housing products can be considered under Policy 12 where they are providing for the needs of different groups.</p>
766	Nick Alston, Avison Young on behalf of St George Plc and Marks & Spencer	Policy 11 Affordable Housing	<div data-bbox="1003 632 2068 968" style="border: 1px solid black; padding: 5px;"> <p>Definition of Affordable Housing</p> <p>Annex 2 of the NPPF defines Affordable Housing for planning purposes. Genuinely Affordable Housing. The Council considers the following to be genuinely affordable housing products to be as per the definition set out in London Plan Policy H4:</p> <ul style="list-style-type: none"> — Social Rent — London Affordable Rent — London Living Rent (only when delivered in compliance with the Council's Intermediate Housing Policy Statement 2019 or any further update.) — Shared Ownership (only when delivered in compliance with the Council's Intermediate Housing Policy Statement 2019 or any further update.) </div> <div data-bbox="1003 999 2068 1520" style="border: 1px solid black; padding: 5px; margin-top: 10px;"> <p>Policy</p> <p>A. All new housing developments in the borough should provide affordable housing in accordance with London Plan Policies H4 to H6, at least 50 per cent of the total number of habitable rooms as affordable housing on site. The affordable housing being provided should be genuinely affordable for the majority of residents in the borough.</p> <p>B. A contribution towards affordable housing will be expected on all housing sites. The following requirements apply:</p> <p>C. on all former employment sites at least 50% on-site provision. Where possible, a greater proportion than 50% affordable housing on individual sites should be achieved.</p> <p>D. on all other sites capable of ten or more units gross 50% on-site provision. Where possible, a greater proportion than 50% affordable housing on individual sites should be achieved.</p> <p style="padding-left: 40px;">on sites below the threshold of 'capable of ten or more units gross', a financial contribution to the Affordable Housing Fund commensurate with the scale of development, in line with the sliding scales set out below and in the Affordable Housing SPD</p> <p>C. Where on site provision is required, an application should be accompanied by evidence of meaningful discussions with a Registered Provider which have informed the proposed tenure, size of units and design to address local priorities and explored funding opportunities.</p> </div>	<p>The London Plan forms part of the development plan; the Local Plan as a whole has to be in general conformity with the London Plan – there can be flexibility where it is reasonably applicable to the Borough circumstances and that is justified with regard to national policy.</p> <p>The Council's Intermediate Housing Policy Statement (2019) is on the Council's website under the housing strategies, and has been adopted by the Council following public consultation.</p> <p>It is considered appropriate for the Local Plan to point to housing strategies and guidance, where they set out details such as rents and income levels that will need to be updated regularly. For example for intermediate rent, discounted market rent and London Living Rent, the GLA require that the maximum income threshold is no more than £60,000 per annum. The GLA update the London Affordable Rent weekly rent benchmarks on an annual basis. It is also appropriate for the Council to respond to the local market conditions. So for intermediate rent, to ensure these units are affordable to a range of household incomes the Council would expect two thirds of these properties to be affordable to those on household incomes below £50,000 per annum, unless otherwise approved by the Council to ensure the schemes viability.</p> <p>See response to comment 758 on the threshold approach and viability.</p> <p>With regard to engagement with Registered Providers, the Council work closely with Registered Providers on both housing and planning policy matters. The Council has recently disposed of Council land to Registered Providers for development of affordable housing which show the potential to deliver schemes to meet or exceed the Plan requirements for tenures split, unit mix etc. Clarify in the policy and supporting text that at the decision-making stage to confirm on-site deliverability and/or establish nominal values of affordable units for viability purposes, evidence should be provided of discussions with a number of Registered Providers (Not for Profit and with local management) to reflect local housing market conditions, and refer to the role of the Council's Affordable Housing Enabling Officers.</p>

			<p>D. Where on-site affordable housing is provided on site, the Council will require an affordable housing tenure split of 70% low-cost rented homes affordable rented housing and 30% intermediate housing (as per London Plan definitions) by habitable room. The intermediate housing will be delivered in line with the Council's Intermediate Housing Policy Statement.</p> <p>E. If the minimum level of affordable housing is not provided in line with Part B (1) and B(2) the application for development will be refused.</p> <p>F. Site specific viability information will only be accepted in exceptional cases, determined by the Council. Any proposals where site specific viability evidence is accepted must provide the maximum amount of affordable housing, informed by detailed viability evidence. The cost of any independent review must be covered by the applicant.</p> <p>G. If a site proposes a non-compliant level of affordable housing and is granted permission it will be subject to detailed review mechanisms throughout the period up to full completion of the development, including an advanced stage review mechanism. Sites that meet the 50% target for affordable housing will not be subject to a late stage review, only an early stage review to incentivise implementation.</p> <p>H. In exceptional circumstances, where affordable housing cannot practically be provided on site, or off-site provision would create a better contribution (in terms of quantity and/or quality), the Council may accept provision of affordable housing off-site in the same area.</p> <p>I. Developments involving the provision of affordable housing will be expected to achieve the same high quality standards as the private housing element of the scheme in terms of accessibility, internal space requirements, external appearance and design quality and provision of private outdoor space.</p> <p>J. The Council will not accept the net loss of any existing affordable housing and will expect any estate regeneration to provide the equivalent amount of affordable housing by habitable room, and where possible, achieve an uplift in provision.</p>		
<p>Explanation/Justification</p>			<p><u>Definitions</u></p>		
<p>The definition of affordable housing set out in the orange box after para 17.11 is muddled which means it is not effective and not in accordance with NPPF para 16(d). There are two separate matters here: (1) a definition of affordable housing; and (2) a definition of what the Council considers to be ‘genuinely’ affordable housing.</p>			<p><i>Definition of Affordable Housing</i></p>		
<p>‘Affordable Housing’ for planning purposes is defined at NPPF Annex 2. This is reiterated at footnote 53 of the London Plan. The definition set out in the orange box is not consistent with this and therefore is not in accordance with national planning policy nor in general conformity with the London Plan. We recommend that the text should be amended in order that it is based on the NPPF definition (there is no need to duplicate – a cross reference will suffice).</p>			<p><i>Definition of ‘Genuinely Affordable Housing’</i></p>		
<p>NPPF para. 63 allows the Local Plan to specify the ‘type’ of affordable housing required within the parameters of the definition provided at Annex 2. Accordingly, the orange box after para 17.11 provides a definition of what the Council considers to be ‘genuinely’ affordable housing, which comprises 4 acceptable types of affordable housing required by the policy. Part A of the policy introduces a further qualifying requirement that the affordable housing provided should be genuinely affordable for the ‘majority of residents in the borough’. The supporting text at paragraph 17.18 goes on to provide a broader explanation which is not consistent with the orange box nor the policy wording, including the statement that ‘genuinely affordable housing is primarily considered to be homes rented at either social rent or London Affordable Rent levels’ (only). When read as a whole, the definition is not properly justified nor clear therefore is not in accordance with national planning policy nor in conformity with the London Plan.</p>			<p>The London Plan identifies ‘preferred’ affordable tenures at para 4.6.3-9, which are products that the Mayor considers to be genuinely affordable. This comprises London Affordable Rent (LAR), Social Rent (SR), London Living Rent (LLR), and London Shared Ownership (LSO). As a starting point, the type of affordable housing required by the policy (i.e. that identified as being ‘genuinely affordable’) should conform with the preferred affordable housing tenures set out in the London Plan.</p>		
<p>The inclusion of Social Rent and London Affordable Rent (LAR) within the definition in the orange box conforms with the London Plan and is sound in principle. However, to ensure effectiveness and having regard to NPPF para 16(d) we recommend that the supporting text refers to the London Plan definitions for these products. Paragraph 17.18 deviates from the orange box by stating that LAR is only acceptable if evidence is provided that it will be affordable to the majority of residents living in the borough. This qualifier is not in conformity with the London Plan (which establishes as a matter of established planning principle that LAR is a genuinely affordable product) and therefore is unsound.</p>			<p>The supporting text at paragraph 17.18 states that ‘In the context of the Local Plan, genuinely affordable housing is primarily considered to be homes rented at either social rent or London Affordable Rent levels’. This is not sound on the basis of non-conformity with the London Plan which establishes the principle that LLR and LSO products also meet the definition of genuinely affordable.</p>		

		<p>The intermediate products (LLR and Shared Ownership) included within the definition in the orange box are not sound on procedural terms and on the grounds of non-conformity with the London Plan. This is principally due to the qualification: ‘only when delivered in compliance with the Council’s Intermediate Housing Policy Statement 2019 or any further update’ (this also applies to Part D of the policy).</p> <ul style="list-style-type: none"> - The Local Plan must be capable of operating as a standalone document (with the exception of making reference to the NPPF and/or London Plan). It follows that it is not capable of being sound if its policies are subject to materially significant content set out in a separate existing statement that does not form part of the development plan (or Government policy) and therefore has not been subject to independent examination to ensure its soundness. - The Council’s Intermediate Housing Policy Statement (2019) does not form part of the Council’s evidence base being consulted on (as part of the Regulation 18 consultation) nor was it available for public download from the Council’s website during the reg.18 consultation period. Accordingly, and notwithstanding the above point, it is not possible to for the public to reach a judgement on whether its content is sound or not. <p>There is no definition for the ‘Shared Ownership’ product. We recommend that this is amended to ‘LSO’ with reference made to the London Plan for LSO and LLR definitions.</p> <p>The relevant evidence that is currently available comprises the Richmond Local Housing Market Assessment (2021), however this does not justify deviating from the London Plan and/or national policy in respect to the soundness issues set out above. Accordingly, in order to make the plan sound we recommend amending the orange box, the policy wording, and paragraph 17.18 in order that the definitions of ‘affordable housing’ and ‘genuinely affordable housing’ are in full conformity with the London Plan. There is no need to duplicate text, amending the wording to simply cross-refer to the London Plan will suffice to make the plan sound.</p> <p><u>50% Minimum Affordable Housing Requirement</u></p> <p>The combined requirement of Parts A, B(1) and B(2) of the policy require a minimum 50% affordable housing to be provided. As a starting point, NPPF para 62 establishes the principle that affordable housing needs should be reflected in Local Plan policies. The London Plan sets a strategic target that 50% of all new homes across London should be affordable, with affordable housing provided through the threshold approach (Policies H4 and H5).</p> <p>NPPF para 16(b) requires local plans to be deliverable. Satisfying this requirement in the context of setting affordable housing policies is dependent on evidence set out in a Whole Plan Viability Assessment. The Viability PPG states that: ‘The role for viability assessment is primarily at the plan making stage. Viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan.’ 002 Reference ID: 10-002-20190509</p> <p>As confirmed in the supporting text to the policy, the Council has not yet undertaken a Whole Plan Viability Assessment. Accordingly there is no evidence base to confirm whether the 50% requirement is viable (and therefore deliverable) and it is therefore fundamentally unsound (not positively prepared, not justified, not effective, and not consistent with national policy).</p> <p>The plan can be made sound through the preparation of a Whole Plan Viability Assessment and subsequent amendments to accord with its conclusions. Until and unless such evidence is prepared that justifies deviating from the threshold approach set out in the London Plan, we recommend that the policy should be amended to fully conform with the London Plan.</p> <p><u>Whole Plan Viability Assessment</u></p> <p>In order to provide a robust evidence base to underpin the policy it is essential that the Whole Plan Viability Assessment fully accounts for the broad range of site-specific considerations that effect the viability of development in the borough. This is particularly important for the proposed site allocations, upon which the deliverability of the plan rests.</p> <p>To illustrate the point, Kew Retail Park is not a ‘typical’ site typology as it is a successful retail destination with an inherently high existing use value. This means that viability is going to be more challenged here than on other brownfield sites where commercial uses may be redundant and/or existing use values lower.</p> <p>Subject to the findings of the evidence, it may well be necessary for the policy to set different affordable housing targets at different locations and sites, as supported by the Viability PPG: ‘Different requirements may be set for different types or location of site or types of development.’ Paragraph: 001 Reference ID: 10-001-20190509. This is consistent with London Plan Policy H4 which recognises that the 50% target is a strategic London wide target that will not be achievable in all cases, particularly if additional funding is not available.</p> <p><u>The Threshold Approach</u></p> <p>The threshold approach was introduced in supplementary planning guidance by the Mayor in 2017 as a solution to address the failings of past policy approaches which have failed to deliver adequate levels of affordable housing to meet the needs of Londoners. The guidance was subsequently established as policy in the new London Plan. Evidence indicates that the shift to the threshold approach has been effective, with the average proportion of affordable housing secured under new planning permissions granted increasing significantly since the approach was introduced. Table 9.1, below, sets out the proportion of affordable housing provided within GLA referable applications (resolution to grant or approved) across London over the period 2011-2020. This demonstrates a clear increase in affordable housing commitments secured following the introduction of the threshold approach in 2017.</p>	
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Table 9.1 – Affordable Housing Commitments (all London) 2011-20

Year	Total Homes	Affordable Homes	% Affordable
2011	29,120	6,900	24%
2012	52,932	13,068	25%
2013	40,058	9,863	25%
2014	44,982	10,026	22%
2015	53,425	13,929	26%
2016	34,807	8,606	25%
2017	23,784	6,188	26%
2018	42,762	14,141	33%
2019	29,631	10,935	37%
2020	38,865	14,337	37%
Total	390,366	107,993	27.7%

Source: Affordable Housing Planning Analysis Referable Applications, GLA, 2021

The current Richmond Local Plan requires 50% of all housing units to be affordable. Table 9.2, below, sets out the proportion of affordable housing that this policy approach has historically delivered:

Table 9.2 – Affordable Housing Completions (LBRuT) (2010/11 to 2019/20)

Year	Total Homes	Affordable Homes	% Affordable
2010/11	399	126	32%
2011/12	208	75	36%
2012/13	695	227	33%
2013/14	235	33	14%
2014/15	304	6	2%
2015/16	491	99	20%
2016/17	460	62	13%
2017/18	382	41	11%
2018/19	419	70	17%
2019/20	331	34	10%
Total	3,924	773	19.7%

Source: London Borough of Richmond upon Thames Local Plan Authority Monitoring Report – Housing (2020)

The data set out in the above table demonstrates that in practice the policy approach set out in the current local plan has not delivered the amount or proportion of affordable homes that it intended. The need to increase the actual and proportional amount of affordable housing in the borough is highlighted in the Local Housing Market Assessment (2021) and reflected in the ambition of the draft new local plan policy. However, we are concerned that despite the evidenced success of the Mayor’s threshold approach in increasing affordable housing supply across London, the supporting text of the draft Local Plan (para 17.20) dismisses this as a mechanism to boost affordable housing supply in the borough, and instead proposes to continue with the previous policy approach of a 50% requirement which, despite best intentions, hasn’t been effective in the past. The historic trend-based evidence firmly indicates that 50% affordable housing is unlikely to be deliverable and the Local Housing Market Assessment (2021) does not justify continuing with the current approach. Accordingly, we consider there to be no justification for deviating from the threshold approach set out in the London Plan. Furthermore, setting an absolute 50% affordable housing target poses a risk to total new housing delivery in the borough as developers will focus upon areas where the threshold approach is valid and reasonable viability cases can be made. On this basis, we consider the overall approach of the policy to be unsound on the grounds of nonconformity with the London Plan. It can be made sound by amending the policy to fully conform with London Plan Policy H5.

Application Stage Viability

In addition to the in-principle soundness issue regarding the threshold approach (as set out above) there are a number of further soundness issues with the proposed approach to the matter of viability at the planning application stage.

Part E states that if the minimum level of affordable housing is not provided the application will be refused. When read in isolation this allows no opportunity for a viability case to be progressed. This is inconsistent with Parts F and G of the policy and

			<p>therefore is not in accordance with NPPF para 16(d). This point could be rectified by amending the text to add 'subject to Parts F and G'.</p> <p>Part F states that site specific viability information will only be accepted in exceptional circumstances. The supporting text (including para. 17.22) goes onto state that viability arguments will only be accepted in extraordinary circumstances. This is clearly not in general conformity with London Plan threshold approach and Policies H4-6 and, in the absence of evidence to robustly justify nonconformity, is not sound.</p> <p><u>Viability Reviews</u></p> <p>The requirements of Part G of the policy are not entirely consistent with London Plan Policy H5 which risks creating confusion for applicants and decision-makers, and conflicts with NPPF para 16(d). We recommend that it is amended to fully conform with London Plan Policy H5 to ensure soundness.</p> <p><u>Provision to be Informed by Meaningful Discussions with RPs</u></p> <p>The Viability PPG states that plan makers should engage with landowners, developers, and infrastructure and affordable housing providers to secure evidence on costs and values to inform viability assessment at the plan making stage.</p> <p>This exercise should therefore be taken at the Plan making stage by the Council to inform the area wide viability assessment. The RPs requirements may not be in alignment with the Council's currently stated targets and there may not be appropriate demand from RPs for the tenures and split indicated. It is not disputed that engagement with RPs is desirable at an early stage but this can only be effective if there is flexibility within the affordable housing policies for both developer's and RPs to respond to housing need and viability constraints on different sites across the Borough.</p> <p><u>70:30 Ratio for Affordable Rented and Intermediate Housing</u></p> <p>The proposed 70:30 split accords with the parameters set by London Plan Policy H6, however in the absence of a Whole Plan Viability Appraisal there is no evidence to confirm whether this is viable (deliverable). It is therefore unsound. The necessary evidence will need to be prepared and the policy updated to reflect its conclusions in order to ensure soundness.</p> <p>Paragraph 4.6.2 in support of Policy H6 of the London Plan states that: There is a presumption that the 40 per cent to be decided by the borough will focus on Social Rent and London Affordable Rent given the level of need for this type of tenure across London. However, it is recognised that for some boroughs a broader mix of affordable housing tenures will be more appropriate either because of viability constraints or because they would deliver a more mixed and inclusive community. The appropriate tenure split should be determined through the Development Plan process or through supplementary guidance.</p>	
767	Catherine Rostron	Paragraph 17.14	<p>Affordable housing I would support the policy of providing social housing at truly 'affordable rents' rather than affordability being based on a percentage of actual private rents.</p> <p>Is there any scope for LBRUT funding additional social housing provision through investment constructs such as Model Dwelling Companies offering fixed rate returns on investments.</p>	<p>The Plan seeks to clarify what is considered genuinely affordable housing in the borough, although for planning purposes the definition of affordable housing is set in the NPPF.</p> <p>As a large scale voluntary transfer (LSVT) authority, the Council does not directly provide affordable housing. The Council's Housing Capital Programme is used to support development by Registered Providers if this assists in achieving the Council's objectives.</p>
768	Jon Rowles	Policy 11. Affordable Housing	<p>Definitions for affordable housing needs to have alms-houses added. For some reason, LBRuT planners refuse to accept its affordable housing whilst at a national level the Government is handing out affordable housing grants to almshouse charities.</p>	<p>See response to comment 771.</p>
769	James Stevens, Home Builders Federation (HBF)	Definition for Affordable Housing (page 173)	<p>The definition excludes First Homes. We acknowledge that the London Plan makes no reference to First Homes. In part this is because the Plan was developed and adopted before the details of the Government's First Homes initiative were published, but also because it is not a tenure/product that the Mayor supports. Nevertheless, the Council should give consideration to allowing First Homes to form an element of the affordable housing supply.</p>	<p>There is reasoned justification for the Council not to include First Homes as a product within the affordable housing tenure mix. Richmond borough has some of the highest house prices in the country, and this affordable product would struggle to be effective in this borough, and even in areas where the values could work, this product would only be affordable to households at the top of the £90,000 year salary range set out in national policy guidance.</p> <p>Although affordable rented homes are the priority need within the borough, the Council also welcome the provision of intermediate housing and understands the role it plays within the wider housing market and allowing middle earners to get onto the home ownership ladder. The Council produces an Intermediate Housing Strategy, which is updated periodically and seeks to ensure that most intermediate homes are affordable to a range of incomes. The strategy, which was recently updated, requires that: two-thirds of all intermediate homes are affordable to those on household incomes of up to £50,000 per annum, with the remaining one-third affordable to those on household incomes up to the GLA intermediate housing threshold of £90,000 per annum for shared ownership; and that Registered Providers demonstrate affordability of sales in each scheme at an average household income of £56,200. The provision of an affordable product which would supersede this (which is only affordable realistically to households with incomes of £80,000) would price out a substantial proportion of our borough.</p> <p>In light of the significant affordable housing needs that it is simply not possible to fully address in the borough, there are difficult choices to make and therefore the Council is prioritising meeting the most acute needs.</p> <p>This position also reflects the GLA's position (First Homes Planning Practice Note, July 2021) that First Homes is a discounted market sale product that falls within</p>

				the category of intermediate housing where it meets national and Mayoral affordability and eligibility criteria, and while the London Plan does not preclude the delivery, it does not allow for the prioritisation of First Homes above the tenures set out in London Plan Policy H6.
770	James Stevens, Home Builders Federation (HBF)	Affordable housing contributions from small sites	<p>Contrary to national policy, the Council intends to levy contributions to the affordable housing fund from schemes of all sizes. The purpose of the Government’s introduction of the relief from affordable housing contributions is to support the establishment and growth of SME developers. An increase in the number of SME developers operating across London is critical to increasing housing supply across London and achieving the London Plan targets. The London Plan at paragraph 4.2.1 establishes this as a strategic priority. As it states:</p> <p><i>For London to deliver more of the housing it needs, small sites (below 0.25 hectares in size) must make a substantially greater contribution to new supply across the city. Therefore, increasing the rate of housing delivery from small sites is a strategic priority. Achieving this objective will require positive and proactive planning by boroughs both in terms of planning decisions and plan-making.</i></p> <p>The Council should lift this requirement from small developments. This is necessary to make the planning application process easier and to help with viability issues.</p>	<p>The importance of delivery from small sites is recognised in the Plan (see Policy 16), however the Council continues to require an affordable housing contribution from small sites and it is acknowledged that this is in conflict with paragraph 64 of the NPPF, but there is no legal requirement to be in conformity with national policy and paragraph 9 allows for local circumstances to be taken into account. The same policy approach was found sound under the previous Local Plan Examination (Inspector’s Report April 2018 paragraph 38), which succeeded the Written Ministerial Statement on affordable housing on small sites (November 2014). The circumstances which justified the policy for the previous Plan remains the same - the borough has an acute need for affordable housing (in the context of high house prices and affordability issues, with evidence on homelessness) together with limited land for development, meaning the Council struggles to rely on large sites to provide a high quantum of affordable homes and an over reliance on small sites.</p> <p>The Council has successfully implemented the policy for over 10 years and financial contributions to the Affordable Housing Fund form part of the Council’s Housing Capital Programme used to increase the delivery of affordable homes. The policy has built-in flexibility to allow applicants to submit viability information if they believe that a contribution on their site would be unviable. This gives small and medium developers of these types of sites confidence that their projects will still be viable, and the policy is not onerous. The delivery of small sites has not substantially altered over the period since the inception, which gives a good indicator that the policy is viable and has been applied flexibly. The Whole Plan Viability Assessment (WPVA) 2023 found that the viability on a small site within the borough is almost identical to a major site and the contribution has minimal impact.</p>
771	Juliet Ames-Lewis, The Richmond Charities	17.27; 17.28 - Delivering New Homes and Affordable Housing For All	<p>17.27;17.28 - Delivering new homes and affordable housing for all. As the main provider of almshouse accommodation for the elderly in the Richmond borough (145 almshouses), The Richmond Charities is pleased to see that almshouses are acknowledged as an important part of providing a wide range and variety of different types of accommodation in the borough. We look forward to continuing to work with the Council in order to deliver new almshouse developments as we have been doing in recent years. We are recognised as an affordable housing provider and therefore we would like the Council to reconsider its requirement for 100% nomination rights on developments of over 10 units. The Richmond Charities houses elderly people in housing need and financial need and Trustees must retain the ability as specified in its governing document to decide who to house in line with the charity's criteria for residency.</p>	<p>Almshouse providers tend to be charities, and as such the independence and flexibility is with trustees, with homes occupied under a licence. This does not offer security of tenure, nor does the Council have any control over nomination rights or how beneficiaries are selected, as they are not subject to the Council’s Housing Allocation Scheme. They therefore do not meet the NPPF definition of affordable housing; a definition the Council cannot vary. The reference in the Reg Plan at paragraph 17.28 is in relation to Policy 12 to recognise that almshouses play an important role in the borough in housing to meet community needs, and the benefits of 100% charitable housing can be considered, where they will reduce pressure on affordable housing. On a case by case basis, the benefits could be considered to outweigh other policy requirements, however this needs to be considered on a site by site basis as a range of factors may be relevant to consider, given the many different types of charities, such as the size of the site, nature of the charitable offer and how this may fit in terms of affordability and eligibility with the Council’s priority needs.</p>
-	Anna Stott, WSP on behalf of Sainsbury’s	Policy 11. Affordable Housing, Site Allocation 5: Carpark for Sainsburys, Uxbridge Road, Hampton	[See comment 299 against Site Allocation 5 in relation to the exceptional circumstances for the removal of the site from MOL]	See response to comment 299 which sets out the exceptional reason for its release, that being the acute affordable housing crisis.
-	Robert Blakebrough	Policy 11. Affordable Housing	[See comment 303 in relation to affordable housing in Teddington]	See response to comment 303 which sets out the acute affordable housing crisis and Council’s commitment to delivering affordable homes.
-		Policy 12. Housing Needs of Different Groups		
772	Ziyad Thomas, Planning Issues Ltd on behalf of Churchill Retirement Living and McCarthy Stone	Policy 12. Housing Needs of Different Groups	<p>McCarthy Stone and Churchill Retirement Living are independent and competing housebuilders specialising in Retirement Living housing for older people. Together, we are responsible for delivering approximately 90% of England’s specialist owner-occupied retirement housing.</p> <p>Paragraph 1 of the PPG Housing for Older and Disabled people states: “The need to provide housing for older people is critical. People are living longer lives and the proportion of older people in the population is increasing. Offering older people, a better choice of accommodation to suit their changing needs can help them live independently for longer, feel more connected to their communities and help reduce costs to the social care and health systems. Therefore, an understanding of how the ageing population affects housing needs is something to be considered from the early stages of plan-making through to decision-taking”.</p> <p>Paragraph: 001 Reference ID: 63-001-20190626 To that end we support the inclusion of sub-clause 4. which states that:</p>	<p>Noted the support for Policy 12 part B.4.</p> <p>The key issue in the borough is the scarcity of large sites and the range of competing priorities, therefore it is considered necessary to consider how any specialist older persons housing scheme will meet local needs. There are various solutions to cater for an ageing population, as age, health and the options available (including funding) will affect people’s personal choices.</p> <p>The Richmond Accommodation-Based Care Commissioning Statement 2022 action plan includes an objective to build resilience and independence by an increased focus on prevention, with a focus on developing broader models of care to</p>

			<p>4. Proposals for supported housing will be supported where they have been designed to meet identified local needs and are in accordance with the Council’s housing and commissioning strategies and London Plan Policy H12. Proposals should demonstrate how the design will address the level of support needed for future residents and be informed by discussions with providers and demonstrate accordance with the Council’s commissioning and housing strategies.</p> <p>The need for specialist older persons’ housing across Greater London is detailed in Table 4.3 of the London Plan which requires the Borough 155 units of specialist older persons’ accommodation per annum.</p> <p>Richmond’s Annual Monitoring Reports (AMR) do not currently monitor the delivery of specialist older persons’ housing in the Borough. The Knight Frank Senior Housing Update 2021 is however a useful reference in this respect and highlights the London Plan target for an additional 4,115 units of specialist older persons’ housing per year across the capital up to 2029. Since the start of the London Plan timeline in 2017 however, only 3,000 seniors housing units have been delivered – less than the requirement for one year. There are a further 1,600 further units either under construction or with planning granted across Greater London, which will do little to address the shortfall.</p> <p>In light of the urgent need to significantly increase the delivery of specialist older persons’ housing in the Borough and across Greater London, we consider that it is imperative that the planning policy framework does not impede the delivery of these forms of accommodation.</p> <p>We therefore question the requirement to demonstrate local need when the need for the specialist older persons’ housing is critical and self-evident.</p>	<p>support older people to remain independent in their own homes and create opportunities for active ageing include Homeshare. This is also reflected in the Richmond Health and Care Plan emphasis on ‘Age Well’.</p> <p>The Housing Learning and Improvement Network (LIN) assessment of need for specialised housing and accommodation for older people in Richmond (2021) includes details of the contextual evidence, including preferences of older people to move (downsizing), and pipeline development, although not all schemes are being built out which does also question the market outlook.</p> <p>See response to comment 773 on the London Plan indicative benchmarks.</p>
773	Nina Miles, GLA on behalf of Mayor of London	Policy 12 - Housing Needs of Different Groups	<p>We support Policy 12 that seeks to assess applications for older person’s housing in accordance with London Plan Policy H13. However, we note that the policy refers to identified local need as set out in the Council’s Local Housing Needs Assessment. This currently appears to be lower than the London Plan annual benchmark for older persons housing set out in Table 4.3 of 155 units for Richmond. We would welcome further review of this figure to bring it closer in line with the London Plan benchmark.</p> <p>Gypsy and Traveller accommodation</p> <p>Richmond’s own research on Gypsies and Travellers in 2013 and 2015 (report published in 2016) suggested that there is no demonstrated need for additional pitches, however the 10-year pitch requirement needs to be set out once the research is updated in 2022 and this should take Policy H14 LP2021 into account.</p> <p>We welcome the reference to the Mayor’s future London-wide Gypsy and Traveller accommodation needs assessment.</p>	<p>The London Plan is clear that these <i>indicative</i> benchmarks are designed to inform local level assessments of specialist housing need (paragraph 4.13.9) rather than a target or requirement, and it is noted that the evidence base behind the London Plan borough benchmarks for specialist older persons housing was produced in 2017.</p> <p>The Planning Practice Guidance on ‘Housing for older and disabled people’ (Paragraph: 006, published 2019) sets out that authorities could provide indicative figures or a range for the number of units of specialist housing for older people needed across the plan area throughout the plan period.</p> <p>The Housing Learning and Improvement Network (LIN) assessment of need for specialised housing and accommodation for older people in Richmond (2021) contains findings for estimated need at a borough level, taking into account local circumstances, and therefore it is considered appropriate that it is lower than the London Plan benchmark. The Housing LIN work finds to 2030 a net need (for housing for older people and housing with care) of circa 75 units per year – add reference to this in the supporting text for clarity. This is also considered proportionate to the Council’s overall housing target of 411 per annum.</p> <p>The Council’s Gypsy and Traveller Research 2023 has been published and the supporting text updated accordingly.</p>
774	Martin Ellis, South West London Clinical Commissioning Group (CCG)	Policy 12. Housing Needs of Different Groups	<p>The CCG welcomes this policy which supports the need to provide a wider range of housing options for older people, reducing a reliance on residential care homes to enable people to live more independent lives for longer. It should be recognised that an increase in homes which support people with complex and nursing care needs will support a shift in healthcare ‘closer to home’ and reduce pressure on hospital services. A concentration of specific types of accommodation, such as residential care beds can place an additional burden on local health and care services.</p> <p>It should also be recognised that other forms of accommodation such as student accommodation and shared living will place pressure on local healthcare services and infrastructure and may require mitigation in the form of developer contributions.</p>	<p>Support noted for enable people to live more independent lives for longer. The impact of new major development on existing infrastructure can be assessed as set out in Local Plan Policy 49 ‘Social and Community Infrastructure’ Part F. The updated Infrastructure Delivery Plan 2023 also identifies future infrastructure and service needs for the borough.</p>
775	Nick Alston, Avison Young on behalf of St George Plc and Marks & Spencer	Policy 12 Housing Needs of Different Groups	<p>Recommended Amendments and Explanation</p> <p>The wording in Parts A and B of the policy indicates that the policy applies to proposals for new ‘housing’ and/or ‘accommodation’. Neither term is defined and the initial paragraphs of the supporting text implies that the policy applies to specialist forms of housing only. On the whole it is not clear. This is not sound having regard to NPPF para 16(d) (accordance with national policy). We recommend that the policy is amended to make it explicitly clear what type of residential development it applies to.</p> <p>Part B of the policy states that ‘a legal agreement will be necessary to secure the nature of provision and any necessary future control in terms of eligibility and affordability for future occupiers’. The use of planning obligations is controlled by Regulation 122(2) of the Community Infrastructure Levy Regulations, with the relevant tests reiterated at NPPF paragraph 57. Whether or not a planning obligation can justifiably be sought for the nature of provision and/or control the eligibility and affordability of future occupiers will need to be judged on a case-by-case basis having regard to these tests. A blanket mandatory policy requirement that applies to all residential development would not satisfy these tests and therefore would not be in accordance with national policy, and therefore not sound. We recommend that the text is amended to replace ‘will be necessary’ with ‘may be necessary’ to resolve this.</p> <p>Part B(1) duplicates Policy 11 which is unnecessary in the context of NPPF para 16(f) (not in accordance with national policy). We recommend that this is deleted.</p>	<p>The policy would apply to any type of specialist housing i.e. that is not private/affordable housing (as considered under Policy 11). The range is indicated in the supporting text at paragraph 17.28 in the Reg 18 Plan; add clarification to state this is not an exhaustive list and can come through various development types, but is considered clear it relates to specialist housing; add definition of conventional homes to the glossary. This is similar to the approach in the adopted Local Plan Policy LP37.</p> <p>The ‘higher’ standards of accessible and inclusive design may be covered by Policy 13 which opts in to the higher accessibility, adaptability and wheelchair housing standards set out in the Planning Practice Guidance, or those set by any relevant regulator – for example if a care home is proposed, then high standards for inclusive access would be expected, such as provision of lifts, for hoists, space for electric buggies. This is explained in the supporting text paragraph 17.39 of the Reg 18 Plan. Add reference to the Mayor of London’s Practice Note on Wheelchair Accessible and Adaptable Student Accommodation 2022.</p>

			Part B(2) requires proposals to demonstrate how ‘higher’ standards of accessible and inclusive design have been met. The term ‘higher’ is not defined therefore the requirement of the policy is not clear. This is not sound having regard to NPPF para 16(d) (not in accordance with national policy). We recommend that the policy is amended to make it explicitly clear what standards of accessible and inclusive design are required. We note that the required standards would need to accord with NPPF para. 35, and we reserve the opportunity to make further representations on this matter at the Regulations 19 stage.	
776	Heather Mathew, Richmond Council for Voluntary Service (CVS)	Pg 178 The housing needs of different groups.	<p>Pg 178 The housing needs of different groups. In the LBRUT Learning Disability Strategy 2015 – 20, the feedback from users and carers and a service review highlighted gaps in service provision for</p> <ul style="list-style-type: none"> supported living services for young people with multiple and complex physical and health needs including behaviour that challenges services accessible quality accommodation for people with a learning disability and a physical disability <p>Both children’s and adult’s services stated intention is to provide facilities and accommodation that enable people with disabilities to stay in borough, keeping them close to their families and communities, and reducing the cost of out of borough placements. Though the strategy is now out of date, the position has not changed and there is a need to ensure building-based services are fit for purpose and meet the accommodation needs of this cohort in the future. This is echoed in the AFC SEND Futures Plan, and needs to be added to this section.</p>	Noted, and these needs are reflected in current housing and commissioning strategies, including the Richmond Accommodation-Based Care Commissioning Statement 2022 and those identified by Achieving for Children. Add to the supporting text details about current housing priorities.
777	Louise Fluker, The Richmond Society	Policy 12. Housing Needs of Different Groups - Paragraph 17.33	We agree that helping older residents to remain in their own homes by making minor adjustments is a good objective but the Council should also focus on encouraging developers to build accommodation suitable for older or less mobile residents who might then downsize from their existing properties	As recognised in paragraph 17.33 in the draft Local Plan, the willingness of a household to downsize is complex and can be influenced by a number of factors. The Richmond Accommodation-Based Care Commissioning Statement 2022 sets out the aim to provide appropriate support in individual’s own homes, to enable people to move towards independence wherever possible. The Joint Strategic Needs Assessment 2021 highlights the impact of changing demand to help plan health and social care services including accommodation based care and the importance of keeping people at home for longer. In addition, Policy 13 deals with housing standards and adopts the higher national standards for accessibility, adaptability and wheelchair housing standards, and highlights the role of the Council’s Specialist Housing Occupational Therapist in providing guidance on meeting requirements and ensuring adaptable and inclusive housing is delivered.
778	Tim Catchpole, Mortlake with East Sheen Society	Policy 12. Housing Needs of Different Groups	No comment.	Noted.
779	James Stevens, Home Builders Federation (HBF)	Policy 12. Housing Needs of Different Groups - Older persons housing	<p>At paragraph 17.33 of the Local Plan the Council observes: <i>Population growth is projected to be concentrated in older age groups (those aged 65 and over), with this age group being projected to increase by 50% from 2021 to 2039 in the latest official projections.</i></p> <p>Relying on the construction of the small number of new homes that Richmond is required to deliver each year to Part M4 (2) and (3) standards or hoping that adaptations will be made to the existing stock (para. 17.33), will not provide an adequate response to the challenge of catering for an ageing population. Nor will these changes happen rapidly enough, especially to the existing stock, over the next decade to meet the needs for older people established by the London Plan. More specialist homes for older people are needed to encourage down-sizing.</p> <p>We strongly recommend that the Council includes in its new Plan the benchmark figure for the supply of older persons housing that is in the London Plan. Table 4.3 of the London Plan establishes a requirement for Richmond to provide 155 units of older persons housing per year from 2017-2029. London Plan policy H13, Part A, 1) requires the boroughs to take account of these benchmark figures when planning for the needs of older people. It is not an absolute requirement that Richmond Council meets this figure each year, but it is a figure that the Council should endeavour to achieve. Compared to other London boroughs, the Council acknowledges</p> <p>Part B, 3) of the policy states that <i>Proposals for new specialist older persons’ housing will be assessed against London Plan Policy H13, where it meets identified local need as set out in the Council’s Local Housing Needs Assessment, housing and commissioning strategies, including how an affordable housing contribution has been maximised.</i></p> <p>The Council needs to clarify what it is intending here. Paragraph 4.13.4 of the London Plan states that the requirements of Policy H13 does not encompass the provision of care home type accommodation. As it says: <i>This policy contains requirements for ‘specialist older person housing’. It does not apply to accommodation that has the following attributes, which is considered ‘care home accommodation’:</i></p> <p>Paragraphs 4.13.5 and 4.13.6 provide additional clarifications. The Council, therefore, will need to take care not to include the supply of care home accommodation as contributing to the benchmark requirements of Table 4.3.</p> <p>HBF does not support the supplementation of the Council’s own assessment of need with the assessment undertaken by the GLA. As the Council recognises, London is a single housing market area, and the assessment of housing need, including the need for specialist accommodation of various types, is one that is undertaken by the GLA on behalf of all the London boroughs and the two development agencies.</p>	<p>As set out in response to comment 777, there is justification for supporting people to remain in their own homes, and adaptations and alterations to enable residents to live independently and safely remaining in their existing property may well be achieved without the need for planning permission, through other initiatives in the Council’s housing and commissioning strategies. Downsizing is complex.</p> <p>See response to comment 773 on the London Plan indicative benchmarks.</p> <p>As clearly set out in Policy 12 and the supporting text, any type of specialist housing i.e. that is not private/affordable housing (as considered under Policy 11) is expected to accommodate the priority needs for affordable housing, either alongside or as part of their specialist provision. This is considered justified given the scarcity of large sites and the acute affordable housing needs.</p>
780	Gavin Hindley, St Mary’s University	Housing needs assessment	<p>We believe this document reflects the position regarding provision of student residential accommodation subject to two amendments:</p> <p>3. Para 8.74 – since our discussions with Iceni, we have undertaken further work on our accommodation projections. The figure of “893” should be “950”.</p>	<p>Noted.</p> <p>The update to the figures in the LHNA 2021 on student accommodation projections suggests on-site capacity to increase by an additional 57 units, which overall is broadly in line with the earlier position.</p>

			4. Para 8.85 - with regard to the statement "There is therefore no requirement to increase the overall housing need on the basis of student growth...." The proviso should make it clear that the statement will not apply if our predicted growth in residential provision cannot be contained within our existing landholdings with the support of the Council.	Paragraph 8.85 in the LHNA is about considering components of housing need to understand whether a higher level of need should be considered, but it is not considered that student growth, regardless of the sites where this is provided, requires the overall housing need to be increase. Policy 12 at B.6 addresses student accommodation to meet the needs of local institutions. Paragraph 17.35 in the Reg 18 Plan, and the Site Allocation for St Mary's University, recognise there are aspirations for a growth in students and to upgrade student accommodation, subject to the constraints of the site and compliance with the relevant Plan policies. Therefore it is not considered necessary to amend the LHNA, and the Plan provides a policy framework to consider any future planning applications against.
-		Policy 13. Housing Mix and Standards		
781	Myrna Jelman	Policy 13. Housing Mix and Standards	Sustainability for new residents not just technical sustainability of new developments: I urge you to set minimum standards for new developments for our Borough that are higher than the minimum standards. Real people will need to live in these developments and minimum room size, minimum number of sunlight hours, minimum ceiling height (2.5m is inadequate), not being overly overlooked, etc. are extremely important for mental and physical health.	The Government created a new approach for the setting of technical standards for new housing in 2015, which rationalised differing standards into a simpler, streamlined system to reduce burdens and bring forward new homes. A new Nationally Described Space Standard was developed, which are optional for authorities to opt into through Local Plan policies if they address a clearly evidenced need, and whether their impact on viability has been considered. The Council has opted in to these standards since 2015, but generally cannot vary the specifics of the standard. As set out in paragraph 17.48 of the Local Plan, the required ceiling heights deviates from the Nationally Described Space Standard as this has been justified through the adoption of the London Plan 2021. This was justified on a Londonwide basis given the unique heat island effect of London, the distinct density and flatted nature of most of its residential development, to ensure adequate quality, especially in terms of light, ventilation and sense of space.
782	Tim Catchpole, Mortlake with East Sheen Society	Policy 13. Housing Mix and Standards	We note the additional statement that areas within PTAL 3-6 or within 800m of a station or town centre boundary should provide a higher proportion of small units and that for market housing the highest demand is for 2 and 3 beds. We also note the new mention of the minimum floor to ceiling height being 2.5m but could not find any reference to apartments needing to have more than one view.	Noted. Add a cross reference in the supporting text to London Plan Policy D6.C which covers single and dual aspect dwellings. It states housing development should maximise the provision of dual aspect dwelling and normally avoid the provision of single aspect dwellings, although it recognises single aspect dwellings can be considered more appropriate design solutions provided there is adequate ventilation, daylight and privacy, and avoid overheating; the supporting text paragraphs 3.6.4 and 3.6.5 provide further details. In addition, note the Residential Development Standards SPD refers at paragraph 4.2.14 to seeking dual aspect particularly for habitable rooms in basements.
783	Mamun Madaser, Habinteg Housing Association	Policy 13 - Housing Mix and Standards	The draft local plan states "At least 10% of all new-build housing (via works to which Approved Document M (ADM) Volume 1 of the Building Regulations applies) is required to meet Building Regulation Requirement M4 (3) 'wheelchair user dwellings' and all other new-build housing (created via works to which Part M volume 1 of the Building Regulations applies) is required to meet Building Regulation Requirement M4 (2) 'accessible and adaptable dwellings', in accordance with London Plan Policy D7. Design and Access Statements, submitted as part of development proposals, should include an inclusive design statement as set out in London Plan Policy D5 to demonstrate how the highest standards of accessible and inclusive design have been achieved." Habinteg strongly supports this policy and recommends that all new homes meet Building Regulations M4 Category 2 accessible and adaptable standard homes to meet the needs of disabled and older people in Richmond. Further, to address a deficit of wheelchair accessible homes, Habinteg recommends that 10% of new homes comply with Part M4 (3) Standard (wheelchair accessible). <ul style="list-style-type: none"> • 14.1 million people in the UK are disabled (Scope) • 45% of pension age adults are disabled • 1.2 million people use wheelchairs (NHS) • Over 400,000 people nationwide are living in homes that do not provide the accessibility they need. <p>LOCAL BENEFITS OF ADAPTABLE AND ACCESSIBLE HOMES New homes that meet category M4(2) will deliver: - significantly fewer disabled people out of work, further reducing the impact on local government spending* - faster hospital discharges - reduced local government expenditure on more expensive residential care settings - provide a better environment for ongoing independence when needs change, *Research from Habinteg and Papworth Trust reported that disabled people with appropriate, accessible homes are four times more likely to be in work than those in unsuitable properties. Providing suitably accessible homes in a welcoming and inclusively designed neighbourhood can transform the lives of people who are so often left to 'make do' in unsuitable accommodation.</p>	Support noted. Add a reference that the Council's Adult Social Services, Health and Housing Committee on 7 June 2022 approved the use of the Inclusive and Accessible Housing Design Guidance to provide clear advice on the Council's expectations regarding wheelchair housing standards and incorporate it into pre-planning and planning application feedback advice. Add a cross-reference in the supporting text to the Government announcement they will mandate the M4 (2) requirement in Building Regulations as a minimum standard for all new homes.

			<p>Habinteg tenants have reported that having their need for accessible homes met can have wide-ranging positive impacts: - finding and maintaining employment - Improved family life such as the ability to access their children’s rooms or to cook a family meal - the ability to come and go as they wish to visit family and friends.</p> <p>LOCAL BENEFITS OF WHEELCHAIR-READY HOMES Habinteg recommends that alongside an increased supply of accessible and adaptable homes, an adequate number of homes should be built to Building Regulations M4 Category 3 (wheelchair user dwellings standard). There are 1.2 million wheelchair users in the UK, and Habinteg’s Insight Report found that just 1.5% of homes outside London are set to be built to wheelchair dwelling standards between 2020 and 2030 . Given the lack of wheelchair accessible properties available in general across the country, Habinteg believes that a 10% requirement of Part M4(3) homes should be considered as a starting point for all local plans, with the remaining 90% meeting Part M4(2) accessible and adaptable dwellings.</p> <p>A NATIONAL ACCESSIBLE HOMES DEFICIT WITH A LOCAL SOLUTION The English Housing survey reported that 91% of existing homes do not provide the four access features for even the lowest level of accessibility – a home that is ‘visitible’. Habinteg’s Insight Report: A Forecast for Accessible Homes 2020 found that just 31.5% of homes are required to meet an accessible housing standard between 2020 and 2030. This will compound the national accessible homes deficit. It is essential that new homes deliver accessibility and adaptability to help meet the national accessible homes deficit.</p> <p>Further information and references: 1. Habinteg’s in house consultancy Centre for Accessible Environments (CAE) offers bespoke training and consultancy on all aspects of access, including housing, public spaces and community facilities. CAE’s services may benefit the Richmond planning department in ensuring housing is delivered to the required M4(2) / M4(3) standards. The team has delivered support to several local authorities and statutory bodies such as Homes England, helping upskill staff in the specific characteristics of accessible housing and providing practical support reviewing development plans and proposals. You can read more on the CAE website at www.CAE.org.uk 2. Housing and Disabled People, a toolkit for local authorities, was a joint project of Habinteg and the Equality and Human Rights Commission published in 2018. The chapter on Planning for Accessible Homes provides some helpful suggestions for producing robust planning policies for accessible housing. https://www.habinteg.org.uk/ehrc 3. Habinteg’s Insight Report: A Forecast for accessible homes assessed accessible housing policy across all local planning authorities in England. You can read the full report and headline findings here. https://www.habinteg.org.uk/localplans/</p> <p>ABOUT HABINTEG Habinteg has over 50 years of experience as a registered provider of accessible and inclusive housing. Our mission is to provide and promote accessible and adaptable homes so that disabled and non-disabled people can live together as neighbours. Our response, therefore, focuses on issues of access and inclusion that we believe are vital to the development of a plan to serve the needs of the whole population of Richmond.</p>	
-	Martin Ellis, South West London Clinical Commissioning Group (CCG)	Housing standards	[See comment 1096 on housing design, and health and wellbeing]	-
784	Nick Alston, Avison Young on behalf of St George Plc and Marks & Spencer	Policy 13 Housing Mix and Standards	<p>Recommended Amendments</p> <p>A. Development should generally provide a mix of sizes and types of accommodation. Areas within PTALS 3-6 or within 800m distance of a station or town centre boundary should provide a higher proportion of small units (studios and 1 beds). For market housing, there is highest demand for 2 and 3 beds. The affordable housing mix should be based on discussions with a Registered Provider(s) to reflect local needs, in accordance with Policy 11 Affordable Housing. The housing mix should be appropriate to the site-specifics of the location.</p> <p>B. All new housing development, including conversions, are required to comply with the Nationally Described Space Standard. As also set out in London Plan Policy D6 on private internal space, the minimum floor to ceiling height must be 2.5m for at least 75 per cent of the Gross Internal Area of each dwelling. New homes significantly above the minimum NDSS standard that do not make efficient use of land will be resisted.</p> <p>C. All new housing development, including conversions, should provide adequate private amenity external space. Purpose built, well designed and positioned balconies, winter gardens or terraces are encouraged where new residential units are on upper floors, if they comply with Policy 46 Amenity and Living Conditions. Regard should be had to the Council’s Residential Development Standards SPD as appropriate.</p>	<p>A reference to the NDSS at part B of the policy is not considered necessary. The only standard referred to is the Nationally Described Space Standard, except for the minimum floor to ceiling height requirement of 2.5m for at least 75% of the GIA which has been justified through the adoption of the London Plan 2021. The minimum standards referred to are considered clearly stated in part B, as all internal dimensions (including floor to ceiling height) are relevant to considering efficient use of land.</p> <p>A reference to winter gardens at part C of the policy is not considered necessary. The Housing Design Standards London Plan Guidance being prepared by the Mayor (consultation draft February 2022) states that enclosing balconies as glazed, ventilated winter gardens is appropriate in limited circumstances, for example, where dwellings will be exposed to high levels of noise and/or strong wind, particularly at high level. A reference to this guidance will be added to the supporting text.</p> <p>Part D of the policy is intended to cover provision of external amenity space, whether in the form of private or communal space. The Inspector’s Report (2018) to the Council’s adopted Local Plan set out that external space standards should not be set out in an overly prescriptive policy, to ensure flexibility in the application of the policy, enabling the site specific circumstances of development</p>

			<p>D. Private Amenity space for all new dwellings, including conversions, should be:</p> <ol style="list-style-type: none"> 1. private, usable, functional and safe; 2. easily accessible from living areas or bedrooms where appropriate; 3. orientated to take account of need for sunlight and shading where feasible; 4. in line with London Plan minimum standards for private amenity space of a sufficient size to meet the needs of the likely number of occupiers; and 5. accommodation likely to be occupied by families with young children should have direct and easy access to adequate private amenity space. <p>E. At least 10% of all new build housing (via works to which Approved Document M (ADM) Volume 1 of the Building Regulations applies) is required to meet Building Regulation Requirement M4 (3) 'wheelchair user dwellings' and all other new build housing (created via works to which Part M volume 1 of the Building Regulations applies) is required to meet Building Regulation Requirement M4 (2) 'accessible and adaptable dwellings', in accordance with London Plan Policy D7. Design and Access Statements, submitted as part of development proposals, should include an inclusive design statement as set out in London Plan Policy D5 to demonstrate how the highest standards of accessible and inclusive design have been achieved.</p> <p>Explanation/Justification As currently drafted, there are some minor issues regarding the likely effectiveness of the policy, as set out below: - Section B of the policy should clarify that the 'standard' referred to in the policy is the NDSS standard to avoid misunderstanding. - Section C should make clear that reference is being made to private amenity space and that winter gardens can be an appropriate form of amenity on constrained sites. Winter gardens are a common feature across a number of London schemes and can help overcome issues of noise and air pollution on constrained sites. - Section D should make clear that this is in reference to Private Amenity. It is sometimes appropriate and/or necessary to have the amenity space accessed from the main bedroom. This is common in some one-bedroom apartments and the policy should not restrict this. Point D.4 should make it clear that it is the London Plan minimum standards that should be achieved for private amenity space.</p>	to be more reasonably considered and ensure effective implementation. As set out in paragraph 17.49 of the draft Reg 18 Plan, private outdoor space is desirable and sought in accordance with the standards set out in London Plan Policy D6. Further clarification is not therefore considered necessary.
785	Faye Wright, Forward Planning and Development on behalf of BMO Real Estate	Policy 13: Housing Mix and Standards, Paragraph 17.53	<p>Paragraph 17.53 sets out where developments are not able to meet policy requirements for housing mix and standards and states that the applicant should identify why.</p> <p>Suggested amendments:- This paragraph should include reference to listed buildings which, if being converted to residential may not be able to meet the mix and standards due to the plan form of the building. There may be heritage benefits in not meeting mix and standards and this should be recognised in this paragraph.</p>	Paragraph 17.53 is considered to allow sufficient flexibility, given part A of Policy 13 allows for a mix of sizes and types of accommodation. While a higher proportion of small units are sought in sustainable locations, it does not set prescriptive proportions by unit size and tenure that need to be met, allowing for a site-specific assessment. The minimum standards for internal and external space, and inclusive access, are sought due to the importance of providing adequate space for health, diversity and community cohesion, and should be an aspiration in all conversions including listed buildings. For listed buildings, Policy 29 would also apply where consideration can be given to the retention and preservation of the original structure and layout, giving weight to the conservation of the heritage asset.
786	Alice Roberts, CPRE London	General Comment (in relation to green space within developments)	Finally, we would like the Council to ensure any new housing developments or estate regeneration 'infill' schemes do not leave residents with inadequate provision of green and communal open space.	For all major development proposals, to address Policy LP31 an open space assessment would be required to address public open space for both future occupants and surrounding local communities.
-		Policy 14. Loss of Housing		
787	Tim Catchpole, Mortlake with East Sheen Society	Policy 14. Loss of Housing	We note that this policy now includes a reference to 'embodied carbon and the circular economy' which is sensible.	Noted.
		Policy 15. Infill and Backland Development		
788	Richard Carr, Transport for London (TfL)	Policy 15. Infill and Backland Development	In A2, we welcome encouraging the redevelopment of car park sites to provide housing, although it should be noted that in policy H1 of the London Plan there is no need to demonstrate that the parking is no longer needed. This is because parking is known to induce car travel so demand for it should not be described as arising from 'need'. As such, reductions in parking can deliver mode shift and reduce the dominance of vehicles in an area. To ensure consistency, this requirement should be deleted.	It is considered appropriate to assess the highways impact of a site-specific proposal, and if there is a net loss of parking there may be a requirement to mitigate any impact on the level of on-street vehicular parking stress in the local area. It is acknowledged that assessment would be against Policies 48 and 49, which refer to the London Plan parking standards and the context of promoting sustainable travel and decreasing car use. Reword this reference to replace the reference to parking need with a cross-reference to assessing any net loss of parking in line with the transport policies.
789	Tim Catchpole, Mortlake with East Sheen Society	Policy 15. Infill and Backland Development	We note that this policy now includes back garden development which in Policy LP39 came under a separate heading (39B). Back garden development is a key issue in our area, in particular 'summerhouses' equipped with water and electricity supplies with	Note concerns in relation to back garden development. However, the London Plan 2021 expects pro-active support for development on small sites; it no longer

			potential for becoming offices, granny flats or even air B&B. The policy on back garden development needs strengthening and we would like to see this remain as a separate section and not be confused with backland.	supports plan-led presumptions against development on back gardens as it did in the past. The policy therefore enables consideration of significant loss of garden land at criterion B.11, as part of the site-specific consideration of the character of the surrounding area. Note that garden buildings may be permitted development, provided they meet certain rules; if there is an unauthorised change of use or change to the planning unit then it is likely it would be a matter for the Council's Planning Enforcement Policy, or any application would need to be considered against the relevant policies in the Plan.
790	Vicky Phillips, Habitats & Heritage	Policy 15. Infill and Backland Development	We agree that garden land needs protection as it often forms part of green corridors between larger green spaces or is home to species that are protected or considered endangered nationally and under the Richmond Biodiversity Action Plan, particularly bats, various bird species, hedgehogs, stag beetles etc. The recent debacle concerning land behind the Prince Albert pub at 24 Hampton Road Twickenham, where mature trees and shrubbery hosting bats and protected species of birds were removed prior to a planning application being lodged for the whole site, shows that the Council probably needs to lobby for additional powers.	Note comments regarding green corridors which are covered by Policy 34. Green and Blue Infrastructure and Policy 39. Biodiversity and Geodiversity. National TPO legislation and guidance gives limited weight to the importance of trees to nature conservation or mitigating climate change, rather the focus is on the 'amenity value' of trees, for example how visible trees are to the public and whether trees are rare or of historic value. The Council has lobbied Government to review TPO legislation.
-	James Stevens, Home Builders Federation (HBF)	Back Gardens	[See comment 746 relating to development in back gardens]	The Plan's overall approach towards garden land is considered appropriate, expecting development to follow a character- and design-led approach to site optimisation. The recognition of local context, including character, spacing, amenity, along with ecological value, is justified, with the supporting text at paragraph 17.73 in the Reg 18 Plan setting out the value of residential gardens. These are not considered 'unnecessary barriers'. Policy 16. Small Sites recognises there are areas where the character area design guidance in the Urban Design Study is to enhance, improve or transform. Policy 15 does recognise at part B.11 that a well-designed backgarden development at an intimate scale with appropriate mitigation can accord with all the factors in the policy.
-		Policy 16. Small Sites		
791	Theresa Oddelm, The Royal Parks	Policy 16 Small Sites	We note that the London Plan sets out a strategic priority to increase the rate of housing delivery from small sites but not at the expense of open space. However, there is potential for such small sites to be located close to the Royal Parks which could have an impact either individually or cumulatively on the Parks. We would like to see this addressed specifically in the Small Sites policy.	Noted, however it is not considered necessary to specify consideration of impacts such as on the Royal Parks in this policy. The cumulative impact of small sites on infrastructure is recognised in the supporting text (paragraph 17.74 in the Reg 18 Plan), and criterion 4 already refers to demonstrating the impact on infrastructure (which is then covered by other Plan policies). There is a policy threshold for assessing specific impacts on certain types of existing infrastructure, including public open space in Policy 37 and social infrastructure in Policy 49, which is set at major applications because the individual impact of small sites in itself would be negligible, and it would not be practicable to measure, assess and secure planning obligations for every type of infrastructure from small sites. Alongside planning obligations, the Community Infrastructure Levy (CIL) is collected (on CIL-liable floorspace) and can be spent on a wide range of potential infrastructure to support development in the borough. See also responses to comments 199 and 1113.
792	Tim Catchpole, Mortlake with East Sheen Society	Policy 16. Small Sites	We have seen a number of planning applications recently in our area for the redevelopment of substandard lock-up garages and/or the development at the rear of corner sites with access from side roads. Some of these have been approved and some refused. We would like to see clearer policy guidance on this.	Such sites will be considered on their own merits, taking into account site-specifics and against all the relevant Plan policies, and it is not considered that a clear policy guidance is necessary to deal with certain types of site. The London Plan Guidance 'Small Site Design Codes' (consultation draft February 2022) refers in section 2.5 to garage sites as backland sites which offer the opportunity to provide additional housing. Add a reference to this guidance in the supporting text.
793	Nina Miles, GLA on behalf of Mayor of London	Policy 16. Small Sites	We welcome the commitment in Policy 16 to support the delivery of Richmond's small sites target of 234 new homes per annum and the incremental intensification of well-connected residential areas (PTAL 3-6 or within 800m of a station) in accordance with the LP2021.	Support noted.
-		Shaping and supporting our town and local centres as they adapt to changes in the way we shop and respond to the pandemic		
794	Peter Willan and Paul Velluet, Old Deer Park Working Group	General comment (in relation to culture)	We support the attention given to the Cultural Policies and would like to see Richmond town centre play a significant role in the Council's Culture Richmond 2021-2031 Plan.	Noted.
795	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	General comment (in relation to culture)	We support the attention given to the Cultural Policies and would like to see Richmond town centre play a significant role in the Council's Culture Richmond 2021-2031 Plan.	Noted.
-		Policy 17: Supporting our centres and promoting culture (Strategic Policy)		

796	Tim Catchpole, Mortlake with East Sheen Society	Policy 17: Supporting our centres and promoting culture (Strategic Policy)	<p>We note that East Sheen is designated as a District Centre and that the boundaries of this centre are to remain unchanged. The E-W extent of the centre runs along the Upper Richmond Road West from Wallorton Gardens to Coval Road and the N-S extent along Sheen Lane from Milestone Green to Mortlake station. The key and secondary shopping frontages on the Upper Richmond Road West however are seen (from Appendix 1) to extend from East Sheen Avenue to Coval Road leaving a number of shop frontages and other non-residential frontages outside the secondary frontage limits. These physical limits need to be better-defined taking into account additional features such as footway widths, scope for hard and soft landscaping and opportunities for creating "Centre Gateway" treatments. This is needed given the admitted uncertainties related to the forecasted speed of change evidenced from phase 1 of the Retailing and Leisure Study.</p> <p>We also note the need to improve wayfinding and the provision of WCs.</p>	<p>The Regulation 19 version of the Local Plan does not include designated shopping frontages. A Primary Shopping Area (PSA) is proposed in East Sheen. As with designated frontages, PSAs are not intended to cover all frontages in centres to allow flexibility for change of use.</p> <p>The extent of the PSA is carefully considered to ensure that in each town centre there is sufficient retail capacity to meet need and to facilitate a compact retail core which fosters comparison shopping. However, it should be noted that the introduction of the combined commercial class (Class E) and the permitted development right allowing change of use from Class E (commercial class) to residential has affected the Council's ability to manage change in centres and to remedy this the Council has confirmed an Article 4 Direction, modified by the Secretary of State and coming into force on 29 July 2022. The Direction as modified restricts the use of this PD right.</p> <p>Improving legibility and wayfinding is mentioned in Policy 17 Subsection 5.</p>
797	Alice Shackleton, on behalf of The Kew Society	Policy 17 Supporting our centres and promoting culture	<p>The policy supports "shopping, leisure and culture uses" in the centres identified. These would include Kew Gardens, Kew Road and Sandycombe Road in different categories of centre.</p> <p>It may be intended but is this wording, "shopping, leisure and culture" intended to represent Use Class E? The area at Kew Gardens Station is attracting more coffee shop/café uses now (as is the case in many centres including Richmond) and it might be useful to stress that a range or mix/diversification of uses is supported so that a preponderance of coffee shops/cafes is resisted where that might overwhelm the mix of uses supporting a community envisaged by Policy 1.</p> <p>Also, would this wording, "shopping, leisure and culture use" include uses such as beauty salons, spa-type uses, fitness studios such as Pilates studios? These uses have been increasing and in some locations, for example, on Sandycombe Road, Kew, where there were empty retail shops with reduced chance of becoming viable for retail use certainly in the current climate, were supported by The Kew Society and apparently have become successful businesses meeting a community need.</p> <p>We suggest, therefore, that such uses be encouraged, and, if not encompassed within the draft policy wording, that they be added to that wording. It may be that these uses would be more appropriate in the smaller centres rather than the five town centres but that could be made clear. We note and support the provisions in paragraphs 18.21 - 23.</p>	<p>"Shopping leisure and cultural uses" would not include all uses which would fall within Class E which is wide ranging.</p> <p>Coffee shops/cafes fall within the combined commercial Class E and therefore there is scope to change to this use without seeking planning permission. Beauty salons & gyms are also included in Class E.</p> <p>The modified Article 4 Direction to restrict change of use from Class E to residential came into force on 29 July 2022 the boundary of which includes the majority of the frontages in Kew Gardens local centre and here some control over change of use exists.</p> <p>Where a change of use would result in an over-concentration of uses in any one particular use resulting in adverse cumulative impact on amenity, Policies 18 A and Policy 19 D can be considered.</p>
798	Nina Miles, GLA on behalf of Mayor of London	Policy 17: Supporting our centres and promoting culture (Strategic Policy) - Town centres	<p>Policy SD6 LP2021 seeks to promote the vitality and viability of London's town centres. We note and support the approach to use the existing stock of vacant properties in Richmond's centres to meet the need identified in the RLNS 2021. The approach towards diversifying and repurposing high streets and centres for a wider range of uses is supported and we note that this will help to facilitate Richmond's strategic policy Living Locally and the 20-minute neighbourhood.</p>	<p>Noted.</p>
799	Nick Alston, Avison Young on behalf of St George Plc and Marks & Spencer	Policy 17 Supporting Our Centres	<p>Recommended Amendments</p> <p>Based upon the explanation and justification below, the following amendments are recommended to ensure the soundness of draft Policy 17:</p> <ul style="list-style-type: none"> - Part A of the draft policy should be amended to include reference to major retail and leisure development also being directed towards allocations in the Local Plan (otherwise Policy 17 does not properly and accurately describe the retail and leisure development strategy in the Borough). - Amend paragraphs 6.181 to 6.185 to reflect the following: <ul style="list-style-type: none"> o The supporting text should be updated to reflect the preparation of a new retail study, which renders the current content paragraphs 6.181 – 6.184 out of date and inaccurate. o remove the theoretical assumption in 6.182 that all new town centre uses could be accommodated in vacant shop units. o whilst it may be the case, as stated in 6.183, that re-purposing existing retail floorspace has a genuine part to play in retail development strategy for the Borough, this does not mean that there is no requirement to allocate sites for major retail development (as allocations may be designed to redevelop existing floorspace to meet identified needs). <p>Explanation/Justification</p> <p>Draft Policy 17 provides a straight-forward and logical approach to the defined 'town centres' across the Borough. It emphasises support for locating a range of land uses within the defined 'town centres', which is in line with national policy and thus should be supported.</p> <p>The decision to define the centre hierarchy after 6.174 is also supported, as it provides clarity to the Local Plan strategy. However, we would urge the Council to make amendments and additions to this section, in the interests of clarity, for two main reasons.</p> <p>First, the Local Plan should be clear over which locations in the table after 6.174 should be classified as 'town centres' for the purposes of applying development management policies such as the sequential and impact tests. The Glossary to the NPPF notes that:</p> <p><i>"References to town centres or centres apply to city centres, town centres, district centres and local centres but exclude small parades of shops of purely neighbourhood significance".</i></p> <p>Therefore, in light of this clear national policy, the Council is required to determine and justify which centres are capable of meeting the definition of a 'town centre' and this will require an assessment of the scale, role, catchment and function. Without this clarity, the Local Plan is failing to meet national policy.</p> <p>Second, the Local Plan should define the role and function of the various tiers of centre in the formal 'town centre' hierarchy. This is required for clarity and to explain the role of 'town centres' in the Borough, including their key characteristics, role and</p>	<p>The supporting text has been updated to reflect the findings of the RLNS Phase 2 Report. The report findings indicate that there is no need to identify further Site Allocations to meet retail need in addition to those identified within the Local Plan.</p> <p>The spatial strategy is clear that major development is to be directed towards the five town centres and that development should be in keeping with a centre's position in the hierarchy.</p> <p>In the borough the hierarchy includes Important Local Parades which would not be considered a centre in interpreting the glossary of the NPPF, but nevertheless form an important part of the borough's provision.</p>

			function. It is also required to assist with the operation of the sequential and impact tests, particularly the choice of which centres should be considered as potential realistic alternative locations for main town centre land use proposals. On a separate matter, whilst it is reasonable for the main 'town centres' policy to refer to the contents of the evidence base , the content of paragraphs 6.181 to 6.184 will need to be re-visited and updated in the next draft of the Local Plan in light of the decision by the Council to undertake a further retail study for the Borough. Indeed, if Policy 17 intends to rely upon the evidence base to support the development strategy therein then the evidence base must tackle the issues / topics in question and provide a reasoned and robust analysis. At the present time, the retail floorspace forecasts quotes in this part of the supporting text are based upon evidence data which is either already out of date (due to the age of the household survey) or will soon become out of date due to the publication of new economic forecasts by Experian in late January 2022. Moreover, if the policy is based, in part, on using vacant floorspace to meet identified needs then the land use surveys should be updated given the on-going effects of the COVID-19 pandemic.	
800	Nick Alston, Avison Young on behalf of St George Plc and Marks & Spencer	Evidence Base – Retail and Leisure Needs Study (Part 1) (2021)	The Phase 1 Retail Study, whilst published in 2021 and containing data gathered by the Council and its consultant recently, relies upon historic information, most notably a survey of shopping patterns dating from 2014. Therefore, whilst the Council has indicated that a further (Phase 2) study is to be published in early 2022, the current evidence base is out of date and cannot be relied upon to support the new Local Plan. Therefore, whilst the preparation of a new retail and town centres study (including a new household survey) is to be welcomed, it must be noted that the Phase 2 study has not yet been published. Given the importance of the new study in its supporting role to retail and town centre planning policies, including specific site allocations, to the soundness of the new Local Plan, interested parties must be given a fair opportunity to comment on the content of the new study and how its recommendations translate to the content of the new Plan. With regards to the content of the Phase 1 Study, and how this may be taken forward in the next stage of the study, we recommend that the following matters are addressed: - A restriction on the amount of convenience goods floorspace at Kew Retail Park (KRP) would not be supported by any recommendations in the Phase 1 retail study. A restrictive approach at KRP would require a clear and reasonable justification which is not provided in either the Phase 1 retail study and / or the draft Plan itself. In particular, it is briefly suggested that a restrictive approach would protect the health of town centres but no evidence is provided in order to demonstrate that the provision of replacement / net additional convenience goods floorspace at Kew Retail Park will lead to any harm to nearby defined 'town centres'. - The methodology for assessing quantitative retail floorspace capacity. The Phase 1 Study does not appear, as is best practice, to assess current/future quantitative retail needs with reference to the existing performance of stores/centres (i.e. actual turnover v benchmark/average turnover). It ignores current actual trading performance and the specific issues associated with retail provision across the Borough. - Consideration of qualitative needs. It is best practice to consider qualitative indicators of need alongside quantitative indicators. This does not appear to be included in the Phase 1 Study. This is considered particularly important in relation to the distribution of retail floorspace in the Borough and the Council's strategy of providing local facilities for the resident population.	It has been a deliberate approach to produce the RLNS in two phases due to uncertainty surrounding the impact of the pandemic on the retail economy & consumers. The supporting text is updated to reflect the latest study outcomes.
801	Alice Shackleton, on behalf of The Kew Society	Paragraph 18.12	Paragraph 18.12 states that the public realm needs, amongst other items, public toilets to encourage people to dwell, with walkable environments. We note and support that such provision is supported by the Council in general and, in particular, form a part of the public realm requirements for new major developments (paragraph 25.5). We refer to our comments under Policy 17 above.	Noted. Policy 51 Health and Wellbeing (Strategic Policy) provides direct support for the provision of public toilets.
802	Louise Fluker, The Richmond Society	Paragraph 18.13 New Permitted Development Rights:p197	we agree with the Council's Article 4 Direction requiring planning permission for change of use from Class E to residential use	Noted
-		Policy 18. Development in centres		
803	Tim Catchpole, Mortlake with East Sheen Society	Policy 18. Development in centres	We note the intention to create "shop-like" appearances to empty retail premises but frankly consider this to be papering over the problem when far more pro-active initiatives to do with ownership, pricing and Use Class management are warranted. We note the challenges and opportunities involved with Use Class E.	The introduction of Class E has limited the Council's ability to manage change of use. Policies are designed to be flexible in terms of change of use so that vacant retail premises can be occupied by other commercial and community uses.
804	Hannah Blunstone, CBRE on behalf of Rugby Football Union (RFU)	Policy 18. Development in Centres	Draft Policy 18 (Part C) as drafted does not acknowledge the trip generation of visitor attractions such as Twickenham Stadium. It currently states (p.198): "C. Major development and/or developments which general high levels of trips should be located within a town centre boundary. Elsewhere development in the Areas of Mixed Use should accommodate development serving a more localised provision, which may include opportunities for retail, recreation, and smaller-scale employment uses..." We propose the policy is reworded as follows to take account of Twickenham Stadium and the Borough's other visitor attractions: "C. Major development and/or developments which generate high levels of trips should be located within a town centre boundary (with the exclusion of visitor attractions including Twickenham Stadium). Elsewhere development in the Areas of Mixed Use should accommodate development serving a more localised provision, which may include opportunities for retail, recreation, and smaller-scale employment uses..."	It is the Council's view that Policy 18 as drafted would not preclude appropriate development at Twickenham Stadium. Policy 26 - Visitor Economy is supportive of proposals which support and enhance existing visitor attractions which would include Twickenham Stadium.
805	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	Policy 18. Development in centres	We refer to Arup's Urban Design Study, December 2016; Lichfields Richmond-upon-Thames Retail and Leisure Needs Study Phase 1 Update, July 2021; Iceni's Richmond Local Housing Market Assessment, December 2021; and Santec's Employment Land and Premises Needs Assessment, December 2021- all provided as supplementary evidence by the Council. We have sought to pull together the estimated demand and availability of floor space for all uses in Richmond Town from 2021 to 2039. Richmond Zone 1 Retail, Non-retail services and Leisure Floor space	The Evidence Base seeks to forecast the need for land uses to ensure that needs are met as required by the NPPF. The research has been produced separately, reflecting industry-standard approaches, but in a co-ordinated way, with liaison between consultants.

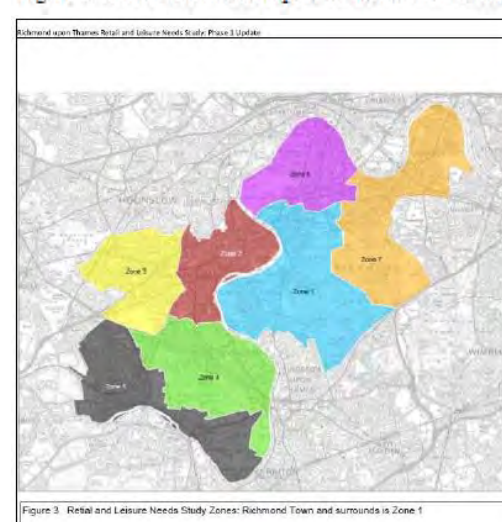
Lichfields' Report estimates population as shown in Figure 1 and retail, non-retail services and leisure over/under supply in Figure 2. Richmond borough is divided by Lichfields into 7 zones: Richmond, Twickenham, Whitton, Teddington, Hampton, Kew/North Richmond, Barnes/E Sheen. The focus here is on Zone 1 for which a map is shown in Figure 3. The population for the borough is estimated to rise by only 2.9% from 2021 to 2039 and to decline slightly in Richmond Zone 1. The over/under supply of space is calculated by estimating the expenditure per person and then the total available expenditure based on the population. Expenditure from existing facilities is estimated and subtracted from the available expenditure to establish the incremental expenditure from new facilities. This increment is then converted into net floor space by turnover density factors and finally into gross floor space over/under supply. We question why Table 11 page 74 of the Lichfields' Report is headed Gross floor space - a step of first calculating Net floor space seems to be missing. It is estimated that in 2039 there will be an under supply of retail and non-retail services floor space of 1,457 m2 and an over supply in preceding years. There is an estimated under supply of 7,000 m2 for leisure in 2039 and 4,000 m2 in 2034 but no information for earlier years. Non-retail services include hairdressers, banks, restaurants, cafes and hot food takeaways. Leisure includes cinemas and cultural activities. Home/internet turnover is taken into account.

Table 1	Population				
	2021	2024	2029	2034	2039
Population Richmond Zone 1 see map attached	23,031	22,440	22,056	22,170	22,536
Population Richmond Borough	199,603	198,220	200,146	201,548	205,200

Figure 1 Source Lichfields report on Retail and Leisure

Table 3.1a	Over(-)/under(+) Supply Cumulative Gross Floorspace					
	Total 2017	2021	2024	2029	2034	2039
	m2	m2	m2	m2	m2	m2
Retail Convenience	7,950		-246	-163	55	388
Retail Comparison	31,727		-1,594	-2,075	-1,895	-1,342
Food/beverage	4,640		-3,266	-217	891	2,411
Non-retail Services						
Total	44,317		-5,106	-2,455	-949	1,457
Leisure					4,000	7,000

Figure 2. Source Lichfields report on Retail and Leisure



Office Floor Space

It is claimed by Santec's report that there is an under supply of office space in Richmond borough and that significant space has been lost to residential use through permitted development rights. The report examines four areas of which Richmond Town is one. The Report says 'Occupiers are attracted to Richmond due to the range of quality and size of space as well as access to amenities and rail links to south and central London' The Report estimates the 2021 demand rising from 46,366 m2 in 2021 to 92,304 m2 in 2039 across Richmond borough using Experian estimates. Using GLA employment estimates to derive office floor space produces a higher demand of 200,000 m2 in 2039. Current stock is around 230,000 m2. Unfortunately the Santec report does not provide separate figures for Richmond Town but we might assume that since Richmond Town is the largest supplier of office space the estimated under supply also applies in part to Richmond Town.

However, there is existing vacant space in Richmond Town which includes the conversion of the Richmond Magistrates Court (a gain of 4,400 sq m) and Sovereign Gate, Kew Rd (recorded as a 2,600 m2 and potentially House of Fraser at 5,777 m2. There are also a number of smaller vacant units.

Housing

Unfortunately, Icen's report on Housing discusses units but not floor space and it tends to deal with the borough as a whole. We know that the London Plan requires 411 units to be built across the borough each year to 2029. But we saw earlier that the

The Council's Town Centre Land Use Survey records ground floor occupiers of premises in the borough's centres, covering approximately 2,500 premises. Despite the pandemic, data have continued to be collected and analysed with surveys taking place in 2019, 2020, 2021 and 2022.

The RLNS has been purposefully split into two phases to allow for the more detailed assessment, including the qualitative element, to be produced in 2022 when it was expected that the impact of the pandemic would have lessened from the previous year, in order to produce as accurate an assessment as possible, bearing in mind timetabling commitments for the Local Plan.

This approach, coupled with the updating of key elements of the evidence base including the Employment Land and Premises Needs Assessment and the Urban Design Study provide an up-to-date basis which supports the Regulation 19 Local Plan.

			<p>population in Richmond Town is set to decline slightly up to 2039. At a very rough guess of gross 65 m2 per unit for accommodation the requirement for additional housing would be for around 27,000 m2 per year across the borough.</p> <p>Supply of Floor space.</p> <p>We are concerned that the character of Richmond Town, which is so important in attracting appropriate uses to the town and preserving the town's success for all stakeholders, will be harmed by an imbalance amount and type in the development of floor space.</p> <p>We welcome the recognition in the Local Plan of the implications, including the risks, of the new combined business land Use Class E and changes to permitted development rights. There is potential for change in Richmond Town's Key and Secondary Frontage and levels above ground floor and that this may provide beneficial flexibility but it introduces considerable risks of change to the town, which as the Urban Design Study 2021 says is of high sensitivity to change and extensive change is not appropriate. The Council's control is limited to conditions and planning obligations and Article 4 Directions. We note that Key and Secondary Frontage in Richmond Town is unchanged between the Local Plan 2018 and the new draft Local Plan.</p> <p>Conclusion</p> <p>We recommend that the several reports on floor space be updated and co-ordinated and besides assessing the borough estimates that they also provide comprehensive estimates across all future uses for Richmond Town. Also, there needs to be a reliable pre-covid Base year stock take for all uses in Richmond Town - say 2019. At the moment the evidence is piecemeal or missing, notwithstanding our attempts at pulling the data together in this response. Furthermore, we believe it would be unwise to place too much weight on the quantitative estimates of the future. Instead there should be recognition of the uncertainties and risks by applying sensitivity analysis and focussing on planning controls the Council can deploy. We do not believe the estimates are sufficiently robust to support major development at Richmond Station or higher buildings.</p>	
806	Nick Alston, Avison Young on behalf of St George Plc and Marks & Spencer	Policy 18 Development in Centres	<p>Recommended Amendments and Explanation</p> <p><u>Part B – Defining Frontages and Boundaries</u></p> <p>At the present time, the draft Local Plan refers to key and secondary frontages in part B of draft Policy 18 and provides a detailed description of these areas in Appendix 1 of the document. It is, however, important that the defined boundaries conform to the requirements of national planning policy and guidance.</p> <p>Whilst all local authorities are now required to deal with the recent changes to the use classes order and permitted development rights, NPPF paragraph 86(b) continues to require planning policies to define the extent of town centres and primary shopping areas. Not only is it required for the new Richmond Local Plan to ensure conformity with national planning policy but it will also assist in the operation of the sequential test for future main town centre land use proposals¹. This should be clarified in the new version of the Local Plan.</p> <p>In addition, it is to be noted that the latest version of the NPPF removes the formal requirement to define primary and secondary frontages. This is, no doubt, a reflection of the changing nature of town centres and an acknowledgement by central government that retail uses² are no longer the central pillar to the health of centres. It also conforms with the introduction of Use Class E.</p> <p>The PPG does still refer to primary and secondary frontages: <i>“Authorities may, where appropriate, also wish to define primary and secondary retail frontages where their use can be justified in supporting the vitality and viability of particular centres”.</i></p> <p>However, if it is clear that a clear justification should be provided. Therefore, we would expect the new Local Plan to provide town centre and primary shopping area boundaries and only defined frontages where they can be justified in their own right (in the face of the parameters of Use Class E) and be accompanied by sound development management policies which are required and effective.</p> <p><u>Part C – High Trip Generating Development</u></p> <p>Part C of the policy requires major development that generates high levels of trips to be located within a town centre boundary. This is not consistent with other parts of the plan (notably the site allocation for Kew Retail Park) and therefore is not in accordance with national policy (NPPF para 16(d)). This can be resolved by amending the text to ‘.....should be located within a town centre boundary or as per site specific allocations’.</p> <p><u>Part F – Out-of-Centre Retail Development</u></p> <p>Part F of the policy states that ‘out of centre development is not considered appropriate in line with the London Plan’. This is not in general conformity with the London Plan (and therefore not in accordance with national policy). The London Plan does not state that out-of-centre development is inappropriate. In line with national planning policy, London Plan Policy SD7 (Part A) requires boroughs to take a town centres first approach. While in most instances this ‘discourages’ out-of-centre development, it does not preclude it.</p> <p>The principal exception supported by London Plan Policy SD7 Part A(3) (as also firmly encouraged by London Plan Policy E9 (Part C(6)) and Policy H1) is the requirement for boroughs to realise the full potential of existing out-of-centre retail parks to deliver housing intensification through development, where this does not result in a <u>net increase</u> in retail floorspace unless this is in accordance with the development plan or can be justified through the sequential test and impact assessment policy requirements. In practice this supports the principle of <u>replacement</u> out-of-centre retail development.</p> <p>In order for the policy to be sound, we recommend that the policy wording is amended to state that ‘out of centre development is not considered appropriate except where this involves the replacement of existing out-of-centre development and/or is in accordance with site allocations’.</p> <p><u>Part F – Sequential Test and Impact Assessment Requirements</u></p> <p>Amendments are required in relation to the approach to main town centre land use proposals in Part F. This part of draft Policy 18 is the only part of the draft Local Plan which refers to the sequential test for main town centre uses and impact assessments for retail and leisure. It is currently unsound and ineffective and requires the following amendments:</p>	<p>The town centre policies of the Regulation 19 Local Plan do not include designated shopping frontages as previously. Primary Shopping Areas have been defined in the larger centres.</p> <p>The research (2023) to support the designation of the PSAs is published as part of the evidence base.</p> <p>Part C – The policy text has been revised to include reference to Site Allocations.</p> <p>Part F – The sentence relating to the inappropriateness of out-of-centre development has been deleted.</p> <p>Part F – further clarification – It is clear that applicants will need to satisfy the sequential and impact tests as set out in national policy & guidance which includes in what circumstances it would apply.</p>

			<p>With regards to the sequential test, it is entitled to refer to national policy and guidance in relation to the specifics of any assessment although the following should be incorporated into the policy and supporting text:</p> <ul style="list-style-type: none"> - The policy should make it clear that, in principle, it relates to proposed main town centres in certain circumstances. - The policy is not, however, in conformity with national policy as the sequential test applies to proposals for main town centre uses located outside of defined centres and not in accordance with an up to date development plan. This latter point needs to be included in Policy 18 in order that it reflects national policy in general and also the decision to allocate sites for retail development such as Kew Retail Park. The allocation of Kew Retail Park is a result of a number of factors, but in relation to retail land use provision it is acknowledged to be an established retail destination whose redevelopment can make a positive contribution to the development strategy for Richmond. Therefore, the sequential test should not apply to proposals at Kew Retail Park (or any other retail allocation) in the same way as other unallocated out of centre retail / main town centre land use proposals. This should be reflected in both Policy 18 and the site allocation policy. <p>Similar inconsistencies occur in the draft Local Plan in relation to the impact test. In particular, the policy requires amendment in order to reflect the provisions of the NPPF and London Plan Policy SD7 which do not require an impact assessment for proposals in accordance with a development plan. It is, of course, acknowledged that some development plan policies / allocations may not be specific about the exact scale and nature of floorspace and there a proportionate impact assessment may be appropriate (tailored to the circumstances of each site / allocation).</p> <p>¹ The Council will no doubt be aware of the sequence of preferred locations for main town centre land uses, including: in-centre; edge-of-centre; and out-of-centre. The Glossary in the NPPF notes that: "For retail purposes, a location that is well connected to, and up to 300 metres from, the primary shopping area. For all other main town centre uses, a location within 300 metres of a town centre boundary. For office development, this includes locations outside the town centre but within 500 metres of a public transport interchange. In determining whether a site falls within the definition of edge of centre, account should be taken of local circumstances".</p> <p>² former Class A1</p>	
807	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	General comment in relation to planning uses	We welcome the recognition of the implications, including the risks, of the new combined business land Use Class E and changes to permitted development rights. We comment later on this topic and the potential consequences for balancing the uses of Richmond Town and its character.	Noted.
-		Policy 19. Managing impacts		
808	Alice Shackleton, on behalf of The Kew Society	Policy 19. Managing Impacts	We note and support Policy 19. We note that the effect of Use Class E does limit the Council's powers. In D "Overconcentration of Uses" perhaps the words "restaurants and cafes with outdoor seating areas" could be added after "(betting shops, public houses, bars and take-aways)". There are such establishments in the Kew Gardens Station area. The potential to reduce diversification of uses applies to these uses as well as the potential adversely to affect the amenity of residents, thus comprising the notion of community in the 20 minute neighbourhood concept.	The policy wording provides examples of land uses which could result in an over-concentration but is not limited to those specifically included in the list. However, as the respondent recognises, the introduction of the combined commercial class, which includes cafes and restaurants, means that there is limited scope to control change use. The other examples in list are not included in Class E.
809	Louise Fluker, The Richmond Society	Policy 19 Managing Impacts	we support the draft policy. Whilst there needs to be flexibility in change of use to reflect changes in society (e.g. the shift from retail to leisure activities such as cafes, bars etc which appeal to visitors to Richmond, there must be a balance that takes account of the residents' enjoyment of their properties.	Noted.
810	Tim Catchpole, Mortlake with East Sheen Society	Policy 19. Managing impacts	We note that HMG is considering the case for making external areas brought into temporary use during the pandemic available permanently. If this transpires then there is the need to designate suitable frontages that are capable of mitigating adverse impacts.	The temporary rights were subsequently made permanent. The policy as drafted is intended to mitigate against negative impacts from outdoor areas including in association with food and drink uses. Section C 2 is specific to the use of pavements. Furthermore, should a proposal result in an over-concentration of any particular use then it could be assessed against Section D. However, restaurants and cafes are included within the Use Class E, and therefore there is considerable scope for change of use within the class which does not require planning permission.
811	Nina Miles, GLA on behalf of Mayor of London	Policy 19. Managing impacts - Agent of Change	Policy D13 LP2021 details the Agent of Change principles and we note that Policy 19 aligns with this approach, placing the responsibility of mitigating the impact of late night uses onto the proposed residential use. A reference to Policy D13 would be welcomed here.	Noted. Reference to policy D13 in London Plan added to supporting text and some minor updating to text for clarity.
812	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	General comment in relation to Evening and Night Time Economy.	<p>We note support throughout the Local Plan to Richmond town centre Night Time economy and in some cases extending to the Riverside and Richmond Green. We welcome the caveat in the Local Plan as stated in Policy 19, Managing Impacts and elsewhere, that there is a combined and cumulative impact that needs to be controlled and that amenity of residents needs to be protected. It may be semantics but we recommend a greater distinction between the evening and night time economies with the later applying to the late evening early hours of the morning. We are opposed to supporting a Night time economy in Richmond Town and on and around Richmond Green due to resident harm and the Riverside due to resident harm including those on the Twickenham riverside.</p> <p>Richmond town and surrounding areas have one of the highest ratios of pubs and bars to residents in the whole of London and moreover confined to a small area by the Thames and railway line. Public transport is reduced by midnight and is very limited shortly thereafter. Police and cleansing resources are not available at night time. We support the evening economy, and increasing family use, but the town needs to wind down before midnight so residents can get their eight hours sleep as advised by the WHO, difficult as this is with Heathrow night flights starting at 4:30am.</p>	<p>Richmond town centre is recognised in the London Plan as having a classification NT 2 – an area of regional/sub-regional importance in terms of the night-time economy.</p> <p>It is considered that the policies proposed, particularly Policy 19, are sufficiently robust to ensure that impact on residential amenity is taken fully into account. The preferred approach is to consider each proposal on its merits and include consideration of cumulative impact and whether the proposal would result in the over-concentration of similar uses contrary to policies 18 & 19.</p> <p>The Council's Licensing policy may also be taken into account, including the Cumulative Impact Policy applying to large parts of the centre.</p>

			We note Policy 19 does enable the Council to limit closing hours of premises. But we urge the Local Plan to go further. Night time economy infers activity past 11pm into the early hours of the morning and we would urge the Local Plan to explicitly discourage this in Richmond Town, but of course recognising there may be exceptions. Disturbance of residents arises to those living in the heart of the town as well as on and around Richmond Green and along the Riverside which also includes resident disturbance on the Twickenham riverside. We urge better distinction between the evening and night economies.	Hours of operation can be restricted where reasonable and appropriate under both licensing and planning regimes.
813	Martin Ellis, South West London Clinical Commissioning Group (CCG)	Policy 19. Managing impacts	We support Clause D of the policy which seeks to avoid an over-concentration of uses which can have a determinantal impact on health and wellbeing. The policy refers to betting shops, public houses, bars and take-aways, but this could be extended to pawnbrokers, pay-day loan stores and amusement centres in line with paragraph 6.9.5 of the London Plan. We suggest public houses are removed from his policy as an overconcentration is unlikely to occur and the policy emphasis under Policy 20 is to resist their loss recognising their architectural and community value.	The policy wording provides examples of land uses which could result in an over-concentration but is not limited to those specifically included. Numbers of pawnbrokers, pay-day loan stores and amusement centres in the borough are comparatively low. There are parts of the borough where there are concentrations of licensed premises, for example in parts of Richmond town centre and thus inclusion of public houses in this non-exhaustive list is considered reasonable and not at odds with the approach to protect public houses with historic or architectural interest and/or community value.
814	Ben Fox, Planware LTD on behalf of McDonald's Restaurants LTD	Policy 19. Managing impacts & Policy 51. Health and Wellbeing (Strategic Policy)	<p>1 Introduction</p> <p>We have considered proposed Policies 19 and 51– with regard to the principles set out within the Framework. We fully support the policy’s aim of promoting healthier living and tackling obesity. However, the proposed policy approach is unsound and fails to provide an evidence-based way of achieving the policy’s objective. It has also been found unsound by several planning inspectors. It is too restrictive and prevents local planning authorities from pursuing more positive policy approaches. The London Borough of Waltham Forest has had such a policy in place for over a decade and its application has proven ineffective in tackling obesity to date.</p> <p>Within these broad points we have the following policy objections to draft Policies 19 & 51:</p> <p>A. The 400m exclusion zone is inconsistent with national planning policy</p> <p>B. The policy is inconsistent, discriminatory and disproportionate.</p> <p>C. Examination of other plans have found similar policy approaches to be unsound.</p> <p>D. There needs to be further exploration into policies that are more positive, have a reputable evidence base and that comply with the Framework.</p> <p>In summary, Planware Ltd consider there is no sound justification for a policy such as policies 19 and 51 which impose a blanket ban on restaurants that include an element of hot food takeaway “<i>within 400-metres of a school.</i>” This is unsound it should be deleted from the plan.</p> <p>However, as stated in the opening paragraph, Planware Ltd supports the aim of promoting healthier living and tackling the obesity crisis. We acknowledge that planning can have a role in furthering these objectives. We would therefore welcome and support any studies between obesity and their relationship with development proposals, including examination of how new development can best support healthier lifestyles and tackling the obesity crisis. When a cogent evidence base has been assembled, this can then inform an any appropriate policy response. This has still not emerged.</p> <p>Given the lack of any clear agreement between experts on the indices of obesity or poor health, analysing the evidence is a necessary part of this objection by way of background. This will all be highlighted in the below text.</p> <p>2 Contribution of McDonald’s UK to the United Kingdom</p> <p>This section of the objection sets out some background context relating to McDonald’s own business, its contribution to United Kingdom, and information on the nutritional value and healthy options of the food that it offers in its restaurants. This evidence is relevant to understanding the adverse and unjustified impacts of the blanket ban approach proposed under draft policies 19 & 51.</p> <p>Economic and Environmental Benefits</p> <p>The first store in the United Kingdom was first opened in 1974 in Woolwich, London. The store is still opened and was interestingly the 3,000th store across the world.</p> <p>With over 36,000 McDonald’s worldwide, it operates in over 100 countries and territories. Approximately 120,000 people are employed by McDonald’s UK, compared to just over 1 million employees worldwide.</p> <p>McDonald’s and its franchisees have become important members of communities in the United Kingdom: investing in skills and developing our people, supporting local causes and getting kids into football.</p> <p>Nationally, the company operates from over 1,300 restaurants in the UK. Over 80% of restaurants are operated as local businesses by franchisees, that’s around 1,100 franchised restaurants.</p> <p>McDonald’s is one of few global businesses that continues to anchor itself in high streets and town centres across the United Kingdom. Not just serving the general public but creating jobs and seeking to improve the communities around them.</p> <p>All McDonald’s restaurants conduct litter picks covering an area of at least 100 metres around the site, at least three times a day, picking up all litter, not just McDonald’s packaging.</p> <p>McDonald’s is a founding member of the anti-littering campaign, Love Where You Live. As part of this, our restaurants regularly organise local community litter picks. The campaign has grown and in 2017, 430 events took place across the UK with around 10,000 volunteers involved. Since the campaign started, 2,600 events have taken place with around 80,000 volunteers involved.</p> <p>McDonald’s restaurants are operated sustainably. For example, their non-franchised restaurants use 100% renewable energy, combining wind and solar and use 100% LED lighting which means we use 50% less energy than fluorescent lighting. All of their used cooking oil is converted into biodiesel for use by delivery lorries. Their entire fleet of lorries runs on biodiesel, 40% of which comes from McDonald’s cooking oil. This creates over 7,500 tonnes fewer CO2 emissions than ultra-low sulphur diesel.</p>	<p>The inclusion of a restriction on new takeaways within 400 metres of schools is established Local Plan policy and reflects Policy E9 of the London Plan with which this policy must be in general conformity.</p> <p>The Council considers that the inclusion of such a policy is justified.</p>

All new McDonald's restaurants in the United Kingdom are fully accessible and we are working toward delivering this same standard for all existing restaurants.
 McDonald's restaurants provide a safe, warm and brightly lit space for people, especially those who may feel vulnerable or threatened waiting for a taxi or outside.
 Many of their toilets are open to all members of the public. They are one of few night time premises that offer this service and given the fact restaurants are located in some of the busiest parts of the country, McDonald's are helping to keep the United Kingdom cleaner.

Nutritional Value of Food and Healthy Options

McDonald's offers a wide range of different food at its restaurants.
 Nutritional information is easy to access and made available online, and at the point of sale on advertising boards, as well as in tray inserts. Information is given on calorie content and key nutritional aspects such as salt, fat and sugar content. This enables an individual is able to identify and purchase food items and combinations that fit in with their individualised calorie or nutritional requirements.
 The menu offer includes a range of lower calorie options, some of which are set out in the on the next page. [see below]
 The restaurants now suggest meal bundles to assist customers in making informed, healthier choices. McDonald's have suggested "favourites" meal bundles, across the breakfast and main menu that enable the choice of low-calorie options to be made even more easily. These 3-piece meal combinations will all be under 400kcal on the breakfast menu, and all under 600kcal on the main menu (with many options under 400kcal on the main menu also), and all individual items on these menu bundles with be either green (low) or amber (medium) on the Food Standards Agency traffic light system for food labelling.
 Examples of low calorie (less than 400kcal) breakfast options (where no single item is red for FSA) include any combination of the following:

- Egg & Cheese McMuffin / Egg & cheese snack wrap / bagel with Philadelphia / porridge; with fruit bag; and a medium black coffee, or espresso or regular tea or water.

Examples of low calorie (less than 600kcal) main menu options (where no single item is red for FSA) are included in the table below. Some 90% of our standard menu is under 500 calories.

Main	Side Options	Drinks Options	Total Calories varies depending on side & drink choice
The Garlic Mayo Chicken One – grilled wrap	Fruit Bag – Pineapple Stick Carrot Sticks Side Salad with Fajita Dressing	Diet Drink Water Medium Black Coffee Regular Tea	Between 379-390kcal
The Sweet Chilli Chicken One – grilled wrap	Fruit Bag – Pineapple Stick Carrot Sticks Side Salad with Fajita Dressing	Diet Drink Water Regular Tea Medium Black Coffee	Between 374-383kcal
Grilled Chicken & Bacon Salad with Fajita Dressing	Fruit Bag – Pineapple Stick Carrot Sticks	Diet Drink Water Regular Tea Medium Black Coffee	Between 238-247kcal

Those specifically wanting a meal low in either fat, salt, or sugar, can tailor their choices accordingly. Any combination of menu items sold at McDonald's can be eaten as part of a calorie controlled nutritionally balanced diet. Customers alternatively eat anything from the menu allowing for this within their overall daily, or weekly nutritional requirements.

Quality of Ingredients and Cooking Methods

McDonald's are always transparent about both their ingredients and their processes and strive to achieve quality. Their chicken nuggets are made from 100% chicken breast meat, burgers are made from whole cuts of British and Irish beef. Coffee is fair trade and their milk is organic. McDonald's want their customers to be assured about what they are consuming. The 'Good to Know'

		<p>section on our website - https://www.mcdonalds.com/gb/en-gb/good-to-know/about-our-food.html - provides a range of information about their processes and where produce is sourced from.</p> <p>Menu Improvement and Reformulation</p> <p>McDonald's is actively and continuously engaged in menu reformulation to give customers a range of healthier options. Louise Hickmott, Head of Nutrition, at McDonald's UK, has provided a letter giving examples of the steps that have been taken in recent years. The information is summarised below.</p> <p>In recent years McDonald's has made great efforts to reduce fat, salt and sugar content across their menu.</p> <ul style="list-style-type: none"> • 89% of their core food and drink menu now contains less than 500 kcals. • Supersize options were removed from their menu in 2004; • 72% of the Happy Meal menus are classified as not high in fat, salt or sugar according to the Government's nutrient profile model; • Since October 2015, 50% of the options on the drinks fountain have been no added sugar (Diet Coke, Coke Zero and Sprite Z); • Recent years have seen the introduction of new items, offering more choice that has included porridge, salads, grilled chicken wraps, carrot sticks, fruit bags including apple and grape, pineapple sticks, and melon chunks, as well as orange juice, mineral water and organic semi-skimmed milk; • Customers can swap fries for fruit bags, carrot sticks or shake salad on the main menu, or the hashbrown for a fruit bag or carrot sticks on the breakfast menu, at no additional cost; • In 2014, McDonald's introduced "Free Fruit Fridays" resulting in 3.7 million portions of fruit being handed out. Since then, discounted fruit is now available with every Happy Meal. <p>Fat</p> <p>A recent meta-analysis and systematic review of 72 studies (45 cohort studies and 27 controlled trials) demonstrated that with the exception of Trans Fatty Acids (TFA), which are associated with increased coronary disease risk, there was no evidence to suggest that saturated fat increases the risk of coronary disease, or that polyunsaturated fats have a cardio-protective effect, which is in contrast to current dietary recommendations (Chowdrey et al, 2014).</p> <p>However, UK guidelines currently remain unchanged; men should consume no more than 30g of saturated fat per day, and women no more than 20g per day (NHS Choices, 2013). It should be remembered that all fats are calorie dense (9kcal/g) and that eating too much of it will increase the likelihood of weight gain and therefore obesity, indirectly increasing the risk of coronary heart disease, among other co-morbidities.</p> <p>What have McDonald's done?</p> <ul style="list-style-type: none"> • Reduced the saturated fat content of the cooking oil by 83%; • Signed up to the Trans Fats pledge as part of the Government's "Responsibility Deal"; • The cooking oil has been formulated to form a blend of rapeseed and sunflower oils to reduce levels of TFA to the lowest level possible; • They have completely removed hydrogenated fats from the vegetable oils; • Reduced the total fat in the milkshakes by 32% per serving since 2010; • Organic semi-skimmed milk is used in tea/coffee beverages and in Happy Meal milk bottles, with lower saturated fat levels compared with full fat variants. <p>Sugar</p> <p>Dietary carbohydrates include sugars, starches and fibre, and each has approximately 4kcal/g.</p> <p>The Scientific Advisory Commission on Nutrition (SACN) currently recommends that approximately 50% of total dietary energy intake should be from carbohydrates (SACN Report, 2015). In 2015 SACN recommended that the dietary reference value for fibre intake in adults be increased to 30g/day (proportionally lower in children) and that the average intake of "free sugars" (what used to be referred to as non-milk extrinsic sugars) should not exceed 5% of total dietary energy, which was in keeping with the World Health Organisation (WHO) recommendations.</p> <p>Current average intake of free sugars far exceeds current recommendations, and excess intake is associated with dental issues and excess calorie intake which can lead to weight gain and obesity.</p> <p>Over the last 10 years our reformulation work has resulted in 787 tonnes less sugar across our menu in 2017 versus 2007. What have McDonald's done?</p> <ul style="list-style-type: none"> • Reducing the sugar in our promotional buns, this removed 0.6 tonnes of sugar • Their Sweet Chilli Sauce has been reformulated to reduce sugar by 14% this equates to 155 tonnes of sugar removed • Their Festive Dip has removed 4 tonnes of sugar • Their famous McChicken Sandwich Sauce has reduced in sugar 45% • Their Tomato Ketchup has reduced in sugar by 20% which equates to 544 tonnes of sugar removed from the system • Their Chucky Salsa has reduced in sugar by 28% • Since 2016 they have reduced the sugar content of Fanta by 54% • The Toffee Syrup in their Toffee Latte has been reformulated to remove 20% of the sugar • McDonald's have also reformulated their Frozen Strawberry Lemonade this has led to 8% sugar reduction per drink <p>Salt</p> <p>A number of health-related conditions are caused by, or exacerbated by, a high salt diet. The strongest evidence links high salt intake to hypertension, stroke and heart disease, although it is also linked with kidney disease, obesity and stomach cancer (Action on Salt website).</p> <p>Salt is often added to food for either taste or as a preservative, and in small quantities it can be useful. Adults in the UK are advised not to exceed 6g of salt per day, but the average intake at a population level is consistently higher than this.</p>	
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McDonald’s have recently made the following changes to further improve their menu</p> <ul style="list-style-type: none"> • Making water the default drink in the Happy Meals; • Making it easier for people to understand the existence of a wide range of under 400 and 600 calorie meal options that are available. <p>Third Party Opinions of McDonald’s</p> <p>McDonald’s regularly receive supportive comments from independent third parties.</p> <p>Professor Chris Elliott, of the Department for Environment, Food & Rural Affairs’ independent Elliott Review into the integrity and assurance of food supply networks: interim report, December 2013: <i>“Each supply chain is unique, showing that there is no single approach to assuring supply chain integrity. The review has seen many examples of good industry practice that give cause for optimism. There is not space within this final report to reference all the good industry practices but those that have stood out include McDonald’s and Morrisons.”</i></p> <p>Jamie Oliver, the TV chef, food writer and campaigner speaking in January 2016 at the Andre Simon Food & Drink Book Awards to the Press Association: <i>“Everyone always liked to poke at McDonald’s. McDonald’s has been doing more than most mid and small-sized businesses for the last 10 years. Fact. But no one wants to talk about it. And I don’t work for them. I’m just saying they’ve been doing it - 100% organic milk, free range eggs, looking at their British and Irish beef.”</i></p> <p>Raymond Blanc, the TV chef and food writer, speaking in 2014, after having presented McDonald’s UK with the Sustainable Restaurant Association’s Sustainability Hero award: <i>“I was amazed. All their eggs are free-range; all their pork is free-range; all their beef is free-range. “[They show that] the fast-food business could change for the better. They’re supporting thousands of British farms and saving energy and waste by doing so. “I was as excited as if you had told me there were 20 new three-star Michelin restaurants in London or Manchester.”</i></p> <p>Marco Pierre White, TV chef and food writer, speaking in 2007: <i>“McDonald’s offers better food than most restaurants and the general criticism of the company is very unfair. “Their eggs are free range and the beef is from Ireland, but you never hear about that. You have to look at whether restaurants offer value for money, and they offer excellent value.”</i></p> <p>These comments below represent independent opinions</p> <p>Supporting Active and Healthy Lifestyles among Employees and Local Communities</p> <p>McDonald’s is focused on its people and is proud to have been recognised for being a great employer. For example: Great Place to Work 2017 ‘Best Workplaces’ – McDonald’s are ranked 4th on the Great Place to Work 2017 ‘Best Workplaces’ list (large organisation). This is our 11th year on the list.</p> <ul style="list-style-type: none"> • The Sunday Times Best Company to Work for List 2017 - we have made The Sunday Times 30 Best Big Companies to Work for list for the seventh consecutive year, achieving 6th position. • Workingmums.co.uk Employer Awards 2017- Innovation in Flexible Working - in November 2017, we were awarded the Top Employer for Innovation in Flexible Working by workingmums.co.uk. The judges specifically recognised our approach to Guaranteed Hours contracts. • The Times Top 100 Graduate Employers - the Times Top 100 Graduate Employers is the definitive annual guide to Britain’s most sought after employers of graduates. • Investors in People Gold - Investors in People accreditation means we join a community of over 15,000 organisations across 75 countries worldwide and it is recognised as the sign of a great employer. • School leavers Top 100 Employees - McDonald’s UK has been certified as one of Britain’s most popular employers for school leavers in 2017, for the third consecutive year. An award voted for by 15-18 year olds in the UK. <p>In April 2017, McDonald’s began to offer employees the choice between flexible or fixed contracts with minimum guaranteed hours. This followed trials in 23 restaurants across the country in a combination of company owned and franchised restaurants. All of their employees have been offered this choice and around 80% have selected to stay on flexible contracts.</p> <p>Over the past 15 years, McDonald’s has been proud partners with the four UK football associations: The English Football Association; The Scottish Football Association; The Football Association of Wales; and The Irish Football Association. This partnership has seen them support over one million players and volunteers. In London since 2014, more than 1,000 people have attended their Community Football Days and have distributed 3,328 kits to accredited teams in the Capital. Of the 171 McDonald’s restaurants within the M25, approximately 88 are twinned and actively supporting a local football club. This serves as an example of the company’s willingness to confront the obesity crisis by a multitude of different approaches.</p> <p>McDonald’s do this work because increasing standards will ultimately create a better experience for young footballers, leading to increased participation and retention of children and young people in sport.</p>	
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In addition, they go beyond the regulations in a lot of cases. For example, when advertising a Happy Meal, they only ever do so with items such as carrot sticks, a fruit bag, milk or water to ensure McDonald's are not marketing HFSS food to children. This has been done voluntarily since 2007.</p> <p>Summary In the light of the above it is clear that McDonald's restaurants offer the district considerable and substantial economic benefits, are supportive of active and healthy lifestyles. They also enable customers to make informed, healthy decisions from the wide-ranging menu options available. It is important that this is acknowledged, given the assumption in draft policies 19 & 51, that all hot food takeaways uses should fall under a blanket ban if within 400m of a school. Given the policy aim – which McDonald's supports – of promoting healthier lifestyles and tackling obesity, other alternatives would be more effective than allowing blanket bans in school areas, which in turn will have negative land use consequences. We turn now to the main points of the objection.</p> <p>3 The 400m Exclusion Zone is Inconsistent with National Policy</p> <p>Introduction This section of the objection considers the proposed policy against national policy. The lack of evidence to support the policy is also discussed in the next section. National policy contains no support for a policy approach containing a blanket ban or exclusion zone for hot food takeaways (or indeed any other) uses. Such an approach conflicts sharply with central planks of Government policy such as the need to plan positively and support economic development, and the sequential approach that seeks to steer town centre uses – which include hot food takeaways - to town centres. Planware Ltd feel that restricting hot food takeaways within 400m of a school is in direct conflict with the framework as the approach is not positive, justified, effective or consistent. The policy, as currently worded, provides no flexibility in accordance with town centre sites, thus conflicting with the sequential approach. These points are further explained in this objection.</p> <p>Practical Impacts The practical impacts on a 400m exclusion zone around schools would have unacceptable negative land use consequences. Consideration should be given to school rules in terms of allowing children outside of the school grounds at lunch times. This is overly restrictive on secondary schools and colleges, where a some of pupils will be legally classed as an adult. Additionally, some college and sixth form pupils will have access to a car, making such a restriction unsound. Primary school children are not allowed outside unaccompanied. No consideration is given to how the 400m is measured from the access point. Guidance should be provided as to whether this is a straight line or walking distance, as this can vary greatly. The Framework does not support the use of planning as a tool to limit people's dietary choices. In addition to this, other E class uses can provide unhealthy products, therefore, there is limited justification for the proposed policies to focus exclusively upon hot food takeaways.</p> <p>Conflict with National Policy The local policy team do not appear to have fully assessed the potential impact of the policy. It essentially creates a moratorium against hot food takeaways uses leaving limited reasonable space for them to locate. Restricting the location of new hot food takeaway proposals through a 400m exclusion zone is not a positive approach to planning, thus failing to comply with the Framework. The suggested restriction within proposed Policies 19 & 51, takes an ambiguous view of hot food takeaways in relation to the proximity to all schools. The policy would apply an over-generic approach to restrict hot food takeaway development with little sound planning reasoning or planning justification. This is contrary to paragraph 11 of the Framework that advises authorities to positively seek opportunities to meet development needs of their area. Thus, is consistent with paragraph 81-82 of the Framework. Para 81 states: <i>"Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future."</i> Para 82 states: Planning policies should:</p>	
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*“a) set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration;
 b) set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period;
 c) seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment;
 and
 d) be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances.”*

As explained in this objection, there is a lack of evidence to demonstrate the link between fast food, school proximity and obesity. The need for evidence is emphasised in paragraph 31 of the Framework that states that each local plan should be based on adequate, up-to-date and relevant evidence. Neither the policy nor the supporting text address this point. Policy needs to be based on evidence and the lack of evidence should highlight a red flag concerning the draft policy.

The policy is likely to be damaging to the district’s economy due to the fact that it is restricting hot food takeaways to an unprecedented level without regard to the local area or the economy.

The Framework cannot be interpreted to provide generic restrictions on a particular use class. There is no basis for such a blanket ban approach in the Framework or Planning Practice Guidance. In fact, the Planning Practice Guidance emphasises that planning authorities should look at the specifics of a particular proposal and seek to promote opportunity rather than impose blanket restrictions on particular kinds of development. In the section on “Health and Wellbeing”:

Paragraph: 002 (Reference ID: 53-002-20140306) states that in making plans local planning authorities should ensure that: *“opportunities for healthy lifestyles have been considered (eg. planning for an environment that supports people of all ages in making healthy choices, helps to promote active travel and physical activity, and promotes access to healthier food, high quality open spaces, green infrastructure and opportunities for play, sport and recreation);”*

Paragraph: 006 (Reference ID: 53-006-20170728) says that a range of criteria should be considered, including not just proximity to schools but also wider impacts. It does not support a blanket exclusion zone. Importantly, the criteria listed are introduced by the earlier text which states:

“Local planning authorities can have a role in enabling a healthier environment by supporting opportunities for communities to access a wide range of healthier food production and consumption choices.”

The above guidance serves to emphasise why it is important to look at particular proposals as a whole, rather than adopting a blunt approach that treats all proposals that include a Sui Generis use as being identical.

4 The Policy is Inconsistent, Discriminatory and Disproportionate

The policy aims to address obesity and unhealthy eating but instead simply restricts new development that comprises an element of Sui Generis use. Yet Class E retail outlets and food and drink uses can also sell food that is high in calories, fat, salt and sugar, and low in fibre, fruit and vegetables, and hot food from a restaurant unit can be delivered to a wide range of locations, including schools. This means that the policy takes an inconsistent approach towards new development that sells food and discriminates against operations with an Sui Generis use. It also means that the policy has a disproportionate effect on operations with an Sui Generis use.

The test of soundness requires that the policy approach is “justified”, which in turn means that it should be the most appropriate strategy when considered against the reasonable alternatives and based on proportionate evidence (paragraph 35 of the Framework).

Given the objectives of the policy, it ought to apply equally to all relevant food retailers. It is unclear how the policy would be implemented and work in a real life scenario.

The table below shows the kind of high calorie, low nutritional value food that can be purchased from a typical A1 high street retailer at relatively low cost. It is contrasted with the kind of purchase that could be made at a McDonald’s. The evidence provided at **Appendix 1** confirms that 70% of purchases by students in the school fringe were not purchased in a hot food takeaway.¹

Company	Snack or meal	Salt (g)	Fat (g)	Calories (kcal)	Price (£)
McDonald’s	Apple and Grape fruit bag	0.0	0.1	46	49p
McDonald’s	Garlic Mayo chicken wrap	1.3	11.0	345	2.99
Greggs	Sausage roll	1.6	22.0	317	90p
Greggs	Cheese and Onion bake	1.6	30.0	436	1.35
Costa Coffee	Nutty flapjack	0.1	23.2	425	1.70
Costa Coffee	Ham and Cheese panini	2.5	13.5	427	3.95

If the policy is to be based on Use Classes, then the proposed policy should place restrictions on other use classes in addition to hot food takeaways. In fact, by restricting hot food takeaway uses only, the policy would encourage food purchases at other locations and allows for the overarching objectives to be compromised.

Finally, it is important that for the majority of days in the year (weekends and school holidays combined) schools are not open at all. Research by Professor Peter Dolton of Royal Holloway College states that “At least 50% of the days in a year kids don’t go to

		<p>school if we count weekends and holidays and absence. They are only there for 6 hours and all but 1 are lessons. So only around 2-3% of the time can [children] get fast food at school.”²</p> <p>For the minority of the year when schools are open, it is important to recognise that many schools have rules preventing children from leaving the school grounds during the school day, and in any event proximity to schools has no conceivable relevance outside of the particular times when children are travelling to or from school in circumstances where their route takes them past the development proposal.</p> <p>The policy’s blanket approach fails to acknowledge that the opportunity for children to access hot food takeaways, as part of a school day, is extremely limited. The complete ban is wholly disproportionate to the circumstances when the concern underlying the policy might become a more prominent matter. Only limited purchases of food are made at hot food takeaways on journeys to and from school. Further details are set out in Appendix 2.</p> <p>5 The Policy is not Justified because of a Lack of an Evidence Base</p> <p>The test of soundness requires policy to be evidence based. There is no evidence of any causal link between the presence of hot food takeaways within 400m of a school. Also, with no basis to indicate over-concentrated areas gives rise to obesity or poor health outcomes, justification is evidently incomplete. In fact, the studies that have considered whether such a causal connection exists [between proximity of a hot food takeaway and poor health outcomes], have found none.</p> <p>Public Health England (PHE), which is part of the Department of Health and Social Care, expressly accept that the argument for the value of restricting the growth in fast food outlets is only “theoretical” based on the “unavoidable lack of evidence that can demonstrate a causal link between actions and outcomes.”³</p> <p>A systematic review of the existing evidence base by Oxford University (December 2013), funded by the NHS and the British Heart Foundation ‘did not find strong evidence at this time to justify policies related to regulating the food environments around schools.’ It instead highlighted the need to ‘develop a higher quality evidence base’.⁴</p> <p>The range of US and UK studies used to support many beliefs about obesity, including the belief that the availability of fast food outlets increased obesity, was comprehensively reviewed in papers co-written by 19 leading scientists in the field of nutrition, public health, obesity and medicine. Their paper “Weighing the Evidence of Common Beliefs in Obesity Research” (published in the Critical Review of Food, Science and Nutrition (Crit Rev Food Sci Nutr. 2015 December 6; 55(14) 2014-2053) found that the current scientific evidence did not support the contention that the lack of fresh food outlets or the increased number of takeaway outlets caused increase obesity (see pp16-17 of the report).</p> <p>There appears to have been no critical assessment of whether the underlying evidence supports the proposed policy approach. In this context, it is important to consider the evidence from the Borough of Waltham Forest, which introduced a school proximity policy in 2008 – about a decade ago. Over that period, the Public Health England data for the borough shows that there has been no discernible impact on childhood obesity rates – with these worsening in recent years. The borough’s Health Profile for 2017 records childhood obesity (year 6) at 26.1% up from 20.3% in 2012, the year London hosted the Olympic Games. While it is accepted that the causes of obesity are complex, it is clear that the school exclusion zone policy had no discernible effect in Waltham Forest. More research and investigation is needed before such a policy approach can be justified by evidence.</p> <p>6 Similar Policies Have Been Found Unsound When Promoted in Other Plans</p> <p>The lack of evidence between proximity of takeaways to local schools and its impact on obesity has been confirmed in a number of planning decisions.</p> <p>In South Ribble the Planning Inspectorate raised concerns about a similar 400m school proximity restriction on fast food, stating ‘the evidence base does not adequately justify the need for such a policy’, and due to the lack of information, it is impossible to ‘assess their likely impact on the town, district or local centres’.⁵</p> <p>Similarly, research by Brighton & Hove concluded that ‘the greatest influence over whether students choose to access unhealthy food is the policy of the individual schools regarding allowing students to leave school premises during the day’.⁶</p> <p>The recent Inspectors response to the London Borough of Croydon (January 2018) regarding a similar prohibition on hot food takeaways, (where a similar campaign to persuade takeaway proprietors to adopt healthy food options existed) confirmed that the councils own ‘healthy’ plans would be stymied by the proposed policy, as would purveyors of less healthy food. The policy failed to distinguish between healthy and unhealthy takeaway food, and “confounds its own efforts to improve healthiness of the food provided by takeaway outlets” and failed to “address the demand for the provision of convenience food”. The Inspector concluded that because the reasons for the policy do not withstand scrutiny, they must be regarded as unsound.</p> <p>The inspector at Nottingham City Council stated “<i>There is insufficient evidence to support the link between childhood obesity and the concentration or siting of A3, A4 and A5 uses within 400m of a secondary school to justify the criterion of policy LS1 that proposals for A3, A4 and A5 uses will not be supported outside established centres if they are located within 400m of a secondary school unless it can be clearly demonstrated that the proposal will not have a negative impact on health and well-being the criterion and justification should therefore be deleted/amended</i>”.</p> <p>The inspector at Rotherham stated “<i>Policy SP25 sets out various criteria against which proposals for hot food takeaways will be assessed. One of the criteria is designed to prevent hot food takeaways within 800 metres of a primary school, secondary school or college when the proposed site is outside a defined town, district or local centres. Having carefully considered the material before me and the discussion at the Hearing I do not consider there is sufficient local evidence to demonstrate a causal link between the proximity of hot food takeaways to schools and colleges and levels of childhood obesity. Although I accept that levels of childhood obesity need to be tackled by both local and national initiatives I do not consider there are sufficient grounds at the present time to include this particular aspect of land use policy in the RSPP</i>”.</p>	
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It would be an inappropriate interference in the market without any supporting evidence and would therefore be unsound”.</i></p> <p><i>The proposed 400m school exclusion zone is a policy that we cannot agree to. The proposed approach is in direct conflict with the Framework. As mentioned in the above text, there is enough reputable information to demonstrate a current evidence base that fails to demonstrate the link between fast food and school proximity. There is also a clear absence of evidence to suggest restricting hot food takeaway uses will lead to healthier lifestyles or influence an individual’s dietary choice.</i></p> <p>7 Alternative Approaches</p> <p>Planware Ltd considers there is no sound justification for the school exclusion zones within policies 19 and 51. These should therefore be removed to provide consistency and to abide by the Framework.</p> <p>Planware Ltd would welcome and support proposals for a wider study of the causes of obesity and their relationship with development proposals, including examination of how new development can best support healthy lifestyles and the tackling of obesity. When a cogent evidence base has been assembled, this can then inform an appropriate policy response. That time has not yet been reached.</p> <p>It is considered until such a time has been reached, the exclusion zone should be removed.</p> <p>8 Conclusion</p> <p>McDonald’s supports the policy objective of promoting healthier lifestyles and tackling obesity. It does not consider that the approach in proposed Policies 19 and 51 is a sound way of achieving those objectives. The underlying assumption in the policy is that all hot food takeaways (and any restaurants with an element of takeaway use) are inherently harmful to health. In fact, this is not supported by evidence. McDonald’s own business is an example of a restaurant operation which includes takeaway but which offers healthy meal options, transparent nutritional information to allow healthy choices, and quality food and food preparation. The business itself supports healthy life styles through the support given to its staff and support given to football in the communities which the restaurants serve.</p> <p>In addition, the policy fails to acknowledge the wider benefits that restaurants can have, including benefits relevant to community health and wellbeing. McDonald’s own business is an example of a restaurant operation that supports sustainable development through the use of renewable energy, the promotion of recycling, the use of energy and water saving devices. The economic benefits of its restaurants in supporting town centres and providing employment opportunities and training are substantial, and important given that improved economic circumstances can support improved health.</p> <p>The policy fails to acknowledge that food choices which are high in calories and low in nutritional value are made at premises trading with Class E consents and can be delivered from the latter. The policy makes no attempt to control these uses.</p> <p>For the reasons given in this objection the proposed policy is very clearly inconsistent with government policy on positive planning, on supporting economic development and the needs of businesses, on supporting town centres, and on the sequential approach. There is no justification in national policy for such restrictions to be applied to hot food takeaways. The effect of the policy had it existed in the past would have been to exclude restaurants such as McDonald’s from major commercial and tourist areas.</p> <p>For the reasons given in this objection the proposed policy lacks a credible evidence base, and similar policies have been found to be unsound by inspectors who have examined other plans. In the one London Borough that has had a similar policy, concerning a school exclusion zone, for around a decade (LB Waltham Forest). It has had no discernible effect on obesity levels, which have in fact increased since its introduction.</p> <p>Given the overall objective of improving lifestyles and lowering obesity levels, restrictive policy regarding hot food takeaway development is a narrow-sighted approach. There is no mention of other possible reasons behind the national high levels of obesity. To discriminate against hot food takeaways alone is worrying and using the planning system to influence people’s daily lifestyle choices is not acceptable.</p> <p>¹The School Fringe: What Pupils Buy and Eat From Shops Surrounding Secondary Schools, July 2008, Sarah Sinclair and Professor J T Winkler, Nutrition Policy Unit of London Metropolitan University.</p> <p>²Peter Dolton, Royal Holloway College, University of London & Centre for Economic Performance, London School of Economics, Childhood Obesity in the UK: Is Fast Food a Factor? http://www.made.org.uk/images/uploads/2_Prof_P_Dolton_presentation.ppt</p> <p>³Public Health England & LGA, Healthy people, healthy places briefing: Obesity and the environment: regulating the growth of fast food outlets, page 5, November 2013</p> <p>⁴J Williams, P Scarborough, A Matthews, G Cowburn, C Foster, N Roberts and M Rayner, Nuffield Department of Population Health, University of Oxford, page 13, 11th December 2013. A systematic review of the influence of the retail food environment around schools on obesity-related outcomes.</p> <p>⁵Letter to South Ribble Borough Council, 29th April 2013, from Susan Heywood, Senior Housing & Planning Inspector, The Planning Inspectorate.</p> <p>⁶Brighton & Hove City Council & NHS Sussex, Hot-food takeaways near schools; An impact study on takeaways near secondary schools in Brighton and Hove, page 30, September 2011</p>	
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			[See Appendix 8 for Appendix 1 – Food in the School Fringe Tends to be Purchased in Non-Hot Food Takeaway Properties and Appendix 2 – Food Purchases made on School Journeys]	
-		Policy 20. Local shops and services		
815	Tim Catchpole, Mortlake with East Sheen Society	Policy 20. Local shops and services	We agree with the policy to resist the closure of pubs!	Noted.
816	Andrew Barnard	Policy 20. Local shops and services	Policy 20 - the Council should reduce business rates which are an impediment to small operators opening shops and other commercial premises which in turn could encourage local enterprise and employment	Noted. Business rates are not a planning matter. The respondent's suggestion is beyond the remit of the Local Plan.
-		Increasing jobs and helping business to grow and bounceback following the pandemic		
817	David Marlow		Housing schemes at Greggs Bakery site in Twickenham and St Clare's Business Park have been refused (the latter by Councillors despite officer recommendation for permission) on grounds of insufficient employment/industrial use. Whilst recognising this need there should be some flexibility where in largely residential areas. Especially Greggs because of difficulty of access - this site now stands a derelict eyesore.	Further applications have been submitted for St Clare Business Park and Greggs Bakery. The nature of the borough means that many of the existing commercial uses are located in residential areas and this is not a justification in itself for the loss of a commercial site. The policy is informed by the evidence which has identified a need to protect existing employment sites.
818	Henry Carling, Kandahar (Jackson Square) Ltd	Chapter 19, Policies 21 to 24 (inclusive) and related supporting text	<p>We have some concerns that the emerging employment policies are too 'binary' in their crafting (i.e. separating out office and industrial uses). The Council's latest evidence (as referred to above) [see comment 845 in relation to paragraph 19.40] and parts of the supporting text sets out that there is a need for flexibility in the provision of uses and floorspace. Taking a binary policy approach as currently proposed does not support this objective. This could result in an inability for the Council to be responsive to the borough's employment/economic needs and also hinder investment in existing employment premises and sites, particularly smaller sites. This is because it does not necessarily reflect how some existing employment sites operate or what some sectors that the Council is seeking to support actually need - including those in the creative industries. Many creative industries and SMEs operate in a way which requires a mix of uses which cut across the office and industrial uses. This is set out in Paragraph 3.11 of the LBRuT Employment Land and Premises Needs Assessment December 2021 which states that: 'We also see some small units being used by creative industries who use the units in flexible ways e.g. part manufacturing, part office space, and warehousing.'</p> <p>Other SMEs may need a combination of office, research and development, light industrial and warehousing. The current approach therefore has the potential to hinder the ability to respond appropriately to the needs of businesses looking for space which provides for flexibility in terms of the uses to be accommodated. Such an approach could also discourage investment in the retention and upgrading of existing premises to provide a modern working environment and secure improvements such as in energy and water efficiency. These are principles which underpin the 'Circular Economy' objectives of the London Plan 2021 but there appears to be limited recognition of the role that refurbishment and intensification of existing sites can play but rather assumes that proposals will primarily be for new development or redevelopment.</p> <p>It is noted that the policies do not explicitly support proposals which facilitate the retention of existing firms where their operational needs have changed such that they require a mix of uses which cross the office/industrial divide.</p> <p>It is requested that the Council considers amendments to the wording of the employment policies and supporting text policy which provides for a more flexible approach to their use for employment purposes. Taking such an approach would provide greater certainty for site owners in being able to offer smaller premises which can be used flexibly and therefore support the viable operation of a site. This would be a greater incentive for investing in the refurbishment of the existing stock to improve the quality of the workspace and the potential to increase the number of employees that can be accommodated/supported (recognising the growth in an element of homeworking), their energy efficiency (supporting both climate change and affordability objectives) and increase the longevity of the stock in line with Circular Economy principles. This approach would also provide certainty for occupiers who may, for example, require premises that provide for equal amounts of office and warehousing, office and light industrial or light industrial and research and development uses. This would avoid both owners and occupiers having to determine whether activities were considered to be primary and ancillary uses and avoid the potential for units to lie empty or result in businesses going outside of the borough. It would also provide flexibility to achieve appropriate intensification of employment use on small, constrained sites.</p> <p>To assist, the Council could take a similar approach to that taken in the adopted Camden Local Plan 2017. The approach taken by Camden seeks to protect premises or sites of less than 1ha that are suitable for continued business use and in particular premises for small businesses, business and services that provide employment for borough residents and those that support the functioning of the local economy. Use of the phrase 'business use' would provide the flexibility being sought.</p>	Comment has been made in relation to Marlborough Trading Estate and its continued designation as a Locally Important Industrial Land and Business Park which is carried forward from the 2018 Local Plan. A full response to the comments is provided under policy 24 (Industrial Land).
-		Policy 21. Protecting the Local Economy (Strategic Policy)		
819	Kevin Scott, Solve Planning Limited on behalf of Port Hampton Estates Limited	Employment Policies (Policies 21, 23 and 24)	<p>Employment policies relevant to the island are as follows:</p> <p>Policy 21. Protecting the Local Economy (Strategic Policy)</p> <p><i>A. The Council will seek to retain and attract investment from existing and emerging sectors to support the existing business base and create a diverse and enterprising local economy. New development proposals will be supported which:</i></p> <p><i>1. Protect existing employment floorspace for office and industrial use, with a no net loss approach. Take an employment-led approach to any redevelopment to meet local economic needs through intensification of the existing employment floorspace.</i></p> <p>...</p>	<p>Support for principles of the policies is noted.</p> <p>The planning application process allows officers to weigh Local Plan priorities, including the requirement to retain existing employment land in employment use alongside site-specific constraints. It is specified in the supporting text to policies 23 (Offices) and 24 (Industrial Land) that there is the opportunity for applicants to demonstrate through the submission of marketing evidence that all alternative employment uses have been explored for a site should a change of use away from</p>

			<p>4. Provide a range of commercial unit types, that are flexible and adaptable to changing needs, suitable for subdivision and configuration for new economic uses and activities for a range of occupiers;</p> <p>Policy 23. Office Retention of offices A. There is a presumption against the loss of office floorspace in all parts of the borough. Proposals which result in a net loss of office floorspace will be refused. Any redevelopment proposals are required to contribute to a net increase in office floorspace. Any refurbishment of existing office floorspace should improve the quality, flexibility and adaptability of office space of different sizes (for micro, small, medium-sized and larger enterprises) as set out in London Plan Policy E1.</p> <p>Policy 24. Industrial land Retention of industrial space A. There is a presumption against loss of industrial land in all parts of the borough. Proposals which result in a net loss of industrial land will be refused. Any redevelopment proposals are required to contribute to a net increase in industrial floorspace. Any refurbishment of existing industrial floorspace should include traditional formats along with workspace for light industrial, through intensification as set out in London Plan Policy E7 part A.</p> <p>While we support the principles included in these policies, they need to take account of site specific conditions that may not enable re-provision of employment space or provision for a range of types of commercial units in the way envisaged by these policies. This is particularly the case on sites such as Platt's Eyot where access arrangements and site conditions mean that the opportunities to provide for a range of uses is more limited. These limitations on some sites should be recognised in these policies or in the site specific text and final policy for Platt's Eyot.</p>	<p>employment be sought. It should be noted that although such evidence will be a material consideration, provision of marketing in itself will not justify an exception to policy.</p> <p>The agent has responded on behalf of Port Hampton Estates Limited in relation to other parts of the plan, including the Site Allocation for Platts Eyot.</p>
820	Tim Catchpole, Mortlake with East Sheen Society	Policy 21. Protecting the Local Economy (Strategic Policy)	We note the aim to make the use of office space more efficient but see little about how this will be done particularly in the context of occupational changes accelerated by the pandemic. We note the intended continuation of the Article 4 direction with regard to PDRs to residential use.	The Employment Sites and Premises Needs Assessment 2021 has identified an ongoing shortfall in the amount of office floorspace in the borough. An update to the employment evidence in 2023 found that there was a lower need for office floorspace, albeit still a positive need for the Plan period. The remaining office floorspace warrants continued (and enhanced) protection through the Council's planning policies to ensure that long-term supply is protected. The introduction of Class E and the new permitted development rights will continue to impact on the supply of office floorspace in the borough (substantial parts of the borough are not included in the modified Article 4 Direction).
821	Theresa Oddelm, The Royal Parks	Policy 21 Protecting the Local Economy	Protection of the local economy is supported by The Royal Parks. However, any increase in numbers of workers in the area could increase footfall within both Richmond and Bushy Parks. We are keen to work with the Borough to ensure that the Parks are protected and any additional pressure on them effectively mitigated, so they can continue to provide the same experience for the additional visitors.	<p>Comment noted. It is recognised there may be additional visitors arising from residential and employment developments, along with impact of tourism.</p> <p>Impacts on existing open spaces (including Royal Parks) are considered elsewhere in the Plan including policy 34 (Green and Blue Infrastructure), 35 (Green Belt, Metropolitan Open Land and Local Green Space) and 37 (Public open space, play, sport and recreation).</p>
822	Faye Wright, Forward Planning and Development on behalf of BMO Real Estate	Policy 21: Protecting the Local Economy (Strategic Policy)	<p>This policy should reflect the wording of London Plan Policy E1E which refers to the protection of existing VIABLE office floorspace capacity should be retained and supported. London Plan Policy E1E also refers to "facilitating the redevelopment, renewal and re-provision of office space where viable and releasing surplus office capacity to other uses".</p> <p>Evidence:- A report has been prepared by Bray Fox Smith which is appended to these representations. This concludes that there is a significant supply of high quality office accommodation in Richmond with new stock coming to the market shortly. This report confirms that supply is outstripping demand and that quality office space is being secured with secondary space not being taken up. This report concentrates on the marketing efforts for Onslow Hall, a listed office building in Richmond which has had 20 viewings over two years but because the space is dated, inflexible, offers low specification and is not DDA compliant, none of the enquiries have led to a lease being signed and the building remains largely vacant. This reflects the difficulties faced by inflexible accommodation which does not provide high standards of workplace accommodation. As a result, Policy 21 should more closely reflect the wording of the London Plan policy which recognises that some office space is no longer viable and that there will be instances where there is surplus office capacity. [See Appendix 9 for the Onslow Hall market update]</p>	<p>These comments are site-specific and relate to Onslow Hall in Richmond. There are features of this site (i.e. it is a listed building) that have been considered through the Development Management process. Note there was a recent S192 application for class E (including restaurant/café) use (22/1135/PS192).</p> <p>Listed buildings are subject to other policies, specifically policy 29 (designated heritage assets) where great weight is given to the conservation of the heritage asset when considering the impact of the heritage asset. An applicant is able to demonstrate through a planning application that all options have been considered for the re-use of a building. The introduction of Class E also provides more scope for alternative commercial uses.</p> <p>A change is not proposed to the policy.</p>
823	Stephen Brooker, Walsingham Planning, on behalf of Whitbread Plc	Policy 21. Protecting the Local Economy (Strategic Policy)	<p>This policy does not recognise that there are important sectors of the economy which provide valuable employment and socio-economic advantages beyond "industry" and "office" uses and which may not be most appropriately located on "business" areas, for example in the leisure and tourism sectors. The policy should be revised to recognise such development and re-development possibilities.</p> <p>Change considered necessary: ADD astersik after A[2] ... "Other employment floorspace*..." Add footnote to policy: : " * employment floorspace shall in this context include floorspace in other sectors of the economy beyond just office and industry, for example leisure, tourism, as appropriate"</p>	<p>The policy specifically relates to, and reflects, the classifications of office and industrial in the Use Classes Order, national guidance and the London Plan. Whilst important to the economy of the borough, leisure and tourism uses do not generally fall within the same use class as offices and industrial land and proposals and the impacts may be assessed differently. The purpose of the policy is to protect and retain office and industrial floorspace.</p> <p>Requirements for leisure and tourism uses are addressed through other policies in the plan including policy 17 (supporting our centres and promoting culture), 18 (development in centres) and 26 (visitor economy).</p> <p>A change is not proposed to the policy.</p>

824	Charlotte Orrell, DP9 Ltd on behalf of London Square Developments	Policy 21 - Protecting the Local Economy (Strategic)	<p>London Plan (2021) Policy E4 seeks to ensure a sufficient supply of land and premises in different parts of London in order to meet current and future demands for industrial and related functions, taking into account strategic and local employment land reviews, industrial land audits and the potential for intensification, co-location and substitution.</p> <p>The London Plan separates London's land and premises for industry, logistics and services into three categories: Strategic Industrial Locations (SIL), Locally Significant Industrial Sites (LSIS) and Non-Designated Industrial Sites. SIL is described within the London Plan as 'London's largest concentrations of industrial, logistics and related capacity for uses that support the functioning of London's economy' and London Plan policy provides strategic protection of these sites due to their critical role to the effective functions of London's economy. In contrast, LSIS have particular local importance for industrial and related functions and London Plan policy requires these designations to be based on evidence from strategic and local demand assessments.</p> <p>Prior to the adoption of the London Plan (2021) the Secretary of State ('SoS') required that Policy E4 was modified to remove the requirement for 'no net loss' of industrial floorspace capacity (and operational yard space capacity) within designated SIL and LSIS. It was identified by the SoS that the previous aspiration to 'retain' sufficient industrial capacity 'may not be realistic' and is inconsistent with the NPPF which importantly requires "that sufficient land of the right type is available in the right places and at the right time to support growth and innovation." (Emphasis added). The 'no net loss approach' was therefore removed from the adopted London Plan Policy E4, which now requires that a 'sufficient supply of land and premises in different parts of London to meet current and future demands for industrial and related functions should be provided and maintained'.</p> <p>Draft Local Plan Policy 21 seeks to apply a 'no net loss' approach to employment floorspace and seeks to intensify existing employment use. Draft policy 21 is therefore contrary to the London Plan (2021) and NPPF, and the Council should seek to align the policy wording in order to retain employment 'capacity' that is identified as being appropriate for supporting continued employment use whilst also taking into account employment type and quality.</p> <p>Notwithstanding this, it is also noted that there are no Strategic Industrial Locations (SIL) designated in Richmond. As such, any employment designation in the borough serves less of a strategic role and, in accordance with the London Plan, should "be fit for purpose", located in sustainable locations and, for industrial uses, be "accessible to the strategic road network and/or have potential for the transport of goods by rail and/or water transport". We argue that Greggs meets none of this criteria – being in a residential area with low footfall, with a PTAL rating of 2, located far from the strategic road network and being in an existing condition where full redevelopment and by associated high capital costs are required for any use (affecting the viability of any sole employment scheme).</p> <p>The supporting text of draft Policy 21 also sets out that sites that are located within mixed-use areas due to historic development patterns do not provide justification for a change of use and it is considered that these land use conflicts can be mitigated. It further states that "constraints such as narrow access, which have been managed by existing occupiers and therefore do not prevent any future or continued employment use". We would dispute this in the case of the Greggs site, on the basis that –</p> <ol style="list-style-type: none"> 1. Greggs has already relocated to another site due the challenges they experienced at the Twickenham site. As such, it has been demonstrated that the highways and amenity impacts of the Greggs Site cannot be mitigated; 2. A future employment use based on the full re-provision of the existing floorspace (circa 7,082 sqm GIA, as currently required under draft Policy 21) would give rise to the same impacts; 3. The accompanying text acknowledges that "changes to ways of working, servicing and delivery do mean the ways businesses operate are changing." This includes a requirement for 24 hour access and operations, large amount of yard space and access for more frequent HGVs – which would all affect the amenity of adjoining residential properties and reduce the site's appeal to commercial occupiers. We also consider that the full re-provision of the existing commercial floorspace on site would be unviable and result in a poor layout which would comprise the appeal to future tenants – for example a failure to meet their requirements for yard space, HGV access and include high ceiling heights in all buildings which further invalidates the current wording of draft Policy 21. 	See detailed response on Gregg's Bakery site under policy 24 - industrial.
825	Faye Wright, Forward Planning and Development on behalf of BMO Real Estate	Paragraph 19.3	<p>Evidence:-</p> <p>London Plan Policy E1i states that "the redevelopment, intensification and change of use of surplus office space to other uses including housing is supported".</p> <p>London Plan paragraph 6.1.7 states that "surplus office space includes sites and/or premises where there is no reasonable prospect of these being used for business purposes. Evidence to demonstrate surplus office space should include strategic and local assessments of demand and supply and evidence of vacancy and marketing".</p> <p>Suggested amendment:-</p> <p>This paragraph (19.3) should be amended to refer to protecting "viable employment land within designated employment areas". This would better reflect the supporting paragraphs of London Plan Policy E1.</p>	<p>The Employment Sites and Premises Needs Assessment 2021 has demonstrated that there is an ongoing shortfall in the availability of land for office and industrial uses in the borough. An update to the employment evidence in 2023 found that there was a lower need for office floorspace, albeit still a positive need for the Plan period.</p> <p>It is specified in the supporting text to policies 23 (offices) and 24 (industrial land) that there is the opportunity for applicants to demonstrate through the submission of marketing evidence that all alternative employment uses have been explored for a site should a change of use away from employment be sought. It should be noted that although such evidence will be a material consideration, provision of marketing in itself will not justify an exception to policy.</p> <p>A change is not proposed to the policy.</p>
826	Heather Mathew, Richmond Council for Voluntary Service (CVS)	3 suggested key areas for inclusion - 2) Property	<p>Office accommodation Affordable and conveniently located local office accommodation has long been a challenge in the borough, and the needs of the sector have not changed as a result of the pandemic. The sector would concur with the needs analysis cited at 19.54 "rent levels for co-working spaces in the borough were quite high. The result of this may be that there is segment of users who are priced out of this market in the borough" and supports "the refurbishment and upgrade of outdated stock to better facilitate changing working practices" (19.4) and ensuring "a range of employment and training opportunities available to local residents" (pg 18)</p>	<p>Note the ongoing challenge to find affordable and well-located office accommodation for the sector, whose needs have not changed as a result of pandemic.</p> <p>Add a reference in policy to reflect the importance of the voluntary and community sector. A reference has also been added in policy 22 (Promoting Jobs and Our Local Economy).</p>

			<p>Whilst services adapted to work from home, and online, there is still a need for in person services, and co located office accommodation that offer flexible work spaces and hybrid delivery. “ There is potential to create a more participatory inclusive and community focused economy with shared workspaces that enable collaboration, knowledge exchange and increase business productivity” (4.5) As a significant local employer the voluntary sector has a role to play in “increasing jobs and helping..... to grow and bounce back following the pandemic” (19 Pg 198) and, like business, has a need for affordable, flexible local workspace for its office space. It is essential that alongside those of local business, the council recognises the accommodation needs of the VCS in this plan (not for profit is only referred to once at 19.50) and acknowledges its role as both an employer and a contributor to economic growth.</p> <p>A VCS Hub There has been a long- held shared ambition with the council for a voluntary sector hub, or hubs, in the borough offering affordable office and meeting spaces for the VCS. The development of the Integrated Care System would further support this. A VCS hub has been talked about and researched by the council and its partners for many years, but has always been bypassed in favour of other facilities (The Exchange for example on the The Old Post Office site) Without any specific commitment in this local plan the same will be true for the next 15-20 years at a time when rising costs and lack of affordable space will further marginalise the local voluntary sector and limit its ability to deliver and expand services to the community.</p>	Note the long-held ambition for a hub, although it is not necessarily for the Council to bring forward a proposal. Paragraph 25.20 in the Regulation 18 Draft Plan refers to flexible spaces for health and social care community hubs to bring services to local areas. In addition, paragraph 24.9 in the Regulation 18 Draft Plan refers to community use of social infrastructure and community facilities as including voluntary sector groups, enabling such consideration against Policy 49. Paragraph 24.12 in the Regulation 18 Draft Plan sets out if there is a loss of social infrastructure as part of the marketing process the space should be offered at a reasonable charge for community groups / voluntary sector organisations.
827	Faye Wright, Forward Planning and Development on behalf of BMO Real Estate	Paragraph 19.4	<p>This paragraph states that evidence is showing that changing office working practices is enabling more efficient use of space. There is also reference to refurbishment and upgrading of outdated stock.</p> <p>Suggested amendment:- Whilst we agree with the principle of upgrading office stock, there should be a recognition that listed buildings provide constrained facilities and layout options (they are not easily adaptable to changing business needs and operational requirements) which do not meet the newer requirements for industrial/workshop style provision which is also attracting emerging office needs. The following wording should be added to the end of this paragraph: "Where office space cannot be successfully upgraded then alternative viable uses should be considered".</p>	<p>Listed buildings are subject to other policies, specifically policy 29 (designated heritage assets) where great weight is given to the conservation of the heritage asset when considering the impact of the heritage asset. An applicant is able to demonstrate through a planning application that all options have been considered for the re-use of a building. The introduction of Class E also provides more scope for alternative commercial uses.</p> <p>A change has not been proposed to the policy.</p>
828	Faye Wright, Forward Planning and Development on behalf of BMO Real Estate	Paragraph 19.7	<p>This relates to affordable and flexible workspace. In the case of some listed buildings, the provision of workspaces which can respond to changing business needs and create future proofed places cannot be provided with harm to the significance of these buildings.</p> <p>Suggested amendment:- The following wording should be added to this paragraph "The Council recognises that some listed buildings may not be adaptable to be able to provide affordable and flexible workspace".</p>	<p>Noted. Policy 29 (designated heritage assets) attaches great weight to the conservation of a heritage asset and officers will weigh this up alongside the requirement for affordable and flexible workspace through the planning application process.</p> <p>The threshold for requiring affordable workspace in policy 23 (offices) is 1000sqm so the policy is only relevant to larger applications.</p> <p>A change has not been proposed to the policy.</p>
-		Policy 22. Promoting jobs and our local economy		
829	Theresa Oddelm, The Royal Parks	Policy 22 Promoting jobs and our local economy	We welcome the note within the policy's supporting text that the Royal Parks offer opportunities for economic spin-offs as well as contributing to supporting a high quality and unique environment. It is important that any resultant increase in footfall within the Parks is effectively mitigated through policy support for the work that The Royal Parks does to protect and conserve them.	Comment noted. Impacts on existing open spaces (including Royal Parks) are considered elsewhere in the Plan including policy 34 (Green and Blue Infrastructure), 35 (Green Belt, Metropolitan Open Land and Local Green Space) and 37 (Public open space, play, sport and recreation).
830	Faye Wright, Forward Planning and Development on behalf of BMO Real Estate	Policy 22	<p>Policy 22: Promoting jobs and our local economy This policy sets out the requirements for high standards of workspace which include adequate widths of doorways and corridors, clear flexible floorplates, level thresholds, inclusive access, good connectivity, facilities including showers, changing rooms etc.</p> <p>These requirements for high standards of workspace should be considered within Policy 23 which relates to protecting existing offices.</p> <p>No amendments are suggested to this policy.</p>	Comment noted. Policy 23 (Offices) also refers to refurbishment of existing office floorspace and the requirement for refurbishment to improve the quality, flexibility and adaptability of office space for different sizes.
831	Tim Catchpole, Mortlake with East Sheen Society	Policy 22. Promoting jobs and our local economy	We welcome the intended support for TV, film studio capacity and river-related/dependent industries.	Support noted.
832	James Sheppard, CBRE, on behalf of LGC Ltd	LGC site – introduction and principle of mixed use development	<p>Introduction: We write on behalf of our client LGC Ltd. (hereafter referred to as 'LGC') in response to consultation on the Draft Local Plan Pre-Publication Version (Regulation 18), hereafter referred to as the 'draft local plan'. LGC is the UK National Measurement Laboratory and Designated Institute for chemical and biomeasurement. It has also been home to the UK Government Chemist function for more than 100 years. The company's headquarters is located on Queens Road in Teddington (hereafter referred to as 'the site'). A site plan is enclosed (see Appendix 1). [See Appendix 10] On behalf of our client, we write to reinforce our previous advocacy for redevelopment of the site for a mix of employment and residential uses, through specific mixed-use allocation. LGC is committed to remaining in Teddington, continuing its longstanding legacy of investment within London Borough of Richmond upon Thames (LBRuT). This is however dependent upon being able to develop a modern and fit-for-purpose new headquarter building at its Queens Road site. LGC has prioritised a plan-led approach to mixed-use redevelopment over the past six years, and through two separate Local Plan consultation processes. In addition, LGC has recently participated in a pre-application meeting with the Council to discuss an indicative mixed-use redevelopment scheme. The time and resource invested to date, promoting this vision, demonstrates a clear intent to secure a future for LGC in Teddington. A truly comprehensive mixed-use enabling development on the site would secure a high-quality office and laboratory headquarter building for LGC in Teddington, whilst also delivering a 'third-party' employment building(s) to accommodate new</p>	<p>Note comment that LGC site should be allocated for mixed-use development. The LGC site is noted in paragraph 19.8 as one of the nationally important scientific institutions in the borough, and it is one of the designated Locally Important Industrial Land and Business Parks. It is also identified as a Key Business Area under policy 23 (offices). The site has not been included as a Site Allocation in the Regulation 19 Local Plan.</p> <p>Also refer to response to comments on policy 24 (Industrial Land)</p>

		<p>businesses and retain investment potential in Teddington, whilst delivering affordable workspace and space for SMEs. This would result in a modern breadth of employment mix on site, re-providing and enhancing the existing net employment space on site. Productive and pragmatic dialogue and engagement with the Council, in respect to the site, is crucial to protect and enhance LGC's important scientific operations and ultimately its future in Teddington.</p> <p>This consultation response follows previous representations submitted to LBRuT on behalf of LGC, in respect of the now adopted Local Plan (July 2018 and March 2020). Previous representations presented to the Council on behalf of LGC were dated 15th February 2017, 18th August 2016 and 28th January 2016. These representations supported a mixed-use allocation at the site, most importantly for a modern, fit-for-purpose headquarters premises, alongside much needed housing, including affordable housing. In addition, representations were also submitted in respect to the Direction of Travel consultation document and Call for Sites, dated 18th March 2020.</p> <p>Since the submission of our previous representations, LGC's existing facilities in Teddington continue to become increasingly unsustainable and uneconomical. In part, this is due to far reaching changes to customer requirements and continuing evolution and miniaturisation of scientific techniques. The pandemic has exacerbated these challenges, with a need to provide high-quality space for its highly skilled employees, seeking to retain the best talent. It is worthy of note, that approximately 50 per cent of staff reside locally within LBRuT.</p> <p>Due to the original design and construction methods used, the building has a significantly higher operating cost than any other UK LGC site. The mechanical and electrical equipment (plant) has reached the end of its sustainable lifespan. It is evident that the buildings are wholly unsustainable into the medium term. Further, increasingly high operating costs and inefficiencies are in large part due to the facility originally being designed and built for wet chemistry laboratory operations. Over time, substantial changes to scientific methods are evident, particularly with the introduction of instrument based analytical methods (e.g. liquid & gas chromatography and mass spectrometry etc). The site in its current form is now constraining LGC's operating model in Teddington, contrary to facilitating the delivery of the LGC's wider business objectives and crucial national and global roles in measurement science.</p> <p>The site remains an important facility to LGC with its skilled local workforce. It is LGC's intention to retain the site as its group headquarters and part of its UK laboratory operations. However, the cost of upgrading the facilities is extremely high and a large portion of the site is surplus to LGC requirements.</p> <p>The draft Local Plan, para. 19.8 clearly sets out the Council's broad support for LGC, stating "the borough is home to nationally important scientific institutions such as the National Physical Laboratory (NPL) and head office of the Laboratory of the Government Chemist (LGC). As such, scientific, innovation and research, provision of incubator units and laboratories will be supported".</p> <p>It has been demonstrated through the preparation of an indicative scheme, presented to the Council, that redevelopment of the site can satisfy no-net loss of employment floorspace, provide a meaningful contribution to the Borough's housing land supply, whilst delivering a policy compliant number of affordable homes. It is well documented that the Council is severely lacking in respect to delivery of affordable homes.</p> <p>2. Indicative scheme:</p> <p>An indicative scheme has been prepared that provides for a sound and sensitive balance of development, re-providing and enhancing net employment floorspace, including for affordable workspace and provision for SMEs, providing new high-quality residential development, and a proposed policy compliant level of affordable housing. The indicative scheme, as shared with planning officers, also incorporates a sensitive design in respect to heights and massing, responding positively to its surrounding urban design context, whilst ensuring the inclusion of high-quality green space and landscaping, opening up the site to promote permeability and active travel.</p> <p>In broad terms, the indicative scheme, when compared with net existing employment floorspace of c.10,000sqm, could include:</p> <ul style="list-style-type: none"> - Approximately 11,000sqm of new employment floorspace (across new LGC building and the third-party building) - Approximately 279 homes, including up to 50 per cent affordable housing - Active, outward facing site boundaries, integrating the site into the surrounding suburban context whilst enhancing site permeability - Publicly accessible green open space. <p>3. Principle of mixed-use redevelopment</p> <p>A land-use allocation for mixed-use enabling development would go much further than simply providing a new, high-quality, fit-for-purpose office and laboratory facility to sustain LGC in the borough into the long-term. The site is currently under-developed, under-used and underoccupied. The effective use of this sustainable brownfield site would be assured through the development of a significant quantum of new Grade A office/employment space, separate to that developed for LGC's new headquarters building. New, much needed employment floorspace would serve to provide accommodation for a range of occupiers including start-ups and expanding/relocating businesses within LBRuT. It would also be proposed for this to include a policy compliant level of affordable workspace. Enabling development as part of the site through the building of new homes must also form part of any mixed-use allocation. New homes would not only serve to subsidise high-quality new commercial development on site, but also provide an appropriate means of delivering much needed affordable homes for the borough.</p> <p>The draft Local Plan sets out strategic policies, notably including the optimisation of land and resources by ensuring new development takes place on previously developed land and in sustainable locations, providing a variety of opportunities for affordable and adaptable workspaces encouraging opportunities to work locally, whilst crucially increasing jobs and helping business to grow and bounce back following the pandemic. A mixed-use development would successfully consolidate an</p>	
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			<p>inefficient series of buildings and make more efficient use of the wider site, thereby increasing the numbers of jobs on site from approximately 250 to approximately 850, modernising an obsolete and outdated building to one that is fit for modern science and business, retain LGC within the borough protecting highly skilled employees, provide new high-quality space for incoming or expanding businesses, whilst providing approximately 150 new affordable homes.</p> <p>A mixed-use redevelopment is proposed, in part, to serve as enabling development to part cross-subsidise the delivery of a new building for LGC. However, crucially, a mixed-use proposal ensures a breadth and depth of planning benefit for the community of Teddington and the wider borough of LBRuT.</p> <p>The supportive context for mixed-use redevelopment is reflected at national policy level. The National Planning Policy Framework (NPPF) actively seeks to promote effective use of land. Paragraph 120 directs that planning policies and decisions should encourage multiple benefits from both urban and rural land, including through mixed use schemes; give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs; and promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively. A mixed-use allocation would truly serve to optimise the use of this highly sustainable brownfield site.</p> <p>In our strong view, the site lends itself well to a mix of employment and residential uses. The site can provide for a comprehensively master planned, sustainable, mixed-use development that retains LGC in the borough, provides new employment space for new, expanding and relocating businesses and delivers much need homes. Importantly, it is clear from the recent under-delivery of affordable housing that the site could serve as a productive and effective contributor to the Council's affordable housing land supply over the forthcoming plan period.</p> <p>[See comment 841 relating to employment, comment 760 in relation to affordable homes, comment 1121 in relation to urban design, and comment 264 relating to the summary]</p>	
833	Stephen Brooker, Walsingham Planning, on behalf of Whitbread Plc	Policy 22. Promoting jobs and our local economy	<p>This policy continues to adopt a very narrow view of "employment floorspace" ignoring that much employment takes place in and is reliant upon sectors such as retail, health, leisure and tourism. The important contribution that other sectors of the economy can make should be recognized.</p> <p>Change considered necessary: ADD A "[8] leisure and tourism sectors"</p>	<p>Whilst important to the economy of the borough, leisure and tourism uses do not generally fall within the same use class as offices and industrial land and proposals and the impacts may be assessed differently.</p> <p>(It is noted that there may be related uses that do fall within Class E, although the majority of leisure and tourism uses will be class F.1, F.2 or Sui Generis Uses and therefore a change of use application will be required).</p> <p>Requirements for leisure and tourism uses are addressed through other policies in the plan including policy 17 (supporting our centres and promoting culture), 18 (development in centres) and 26 (visitor economy).</p> <p>A change is not proposed to the policy.</p>
-		Policy 23. Offices		
834	Faye Wright, Forward Planning and Development on behalf of BMO Real Estate	Policy 23	<p>Policy 23 states that:"A There is a presumption against the loss of office space in all parts of the borough". This policy should reflect London Plan Policy E1 and the requirements of Policy 22 so that existing unviable office space which cannot be adapted to provide high standards of workspace is not restricted by the policy.</p> <p>The requirements set out within Policy 22 should be considered within Policy 23 which relates to protecting offices.</p> <p>Suggested amendment:- The wording of policy 23 should reflect London Plan Policy E1 and the requirements of Policy 22 so that existing unviable office space which cannot be adapted to provide high standards of workspace is not restricted by the policy. It is not considered that Policy 23 is sufficiently flexible to recognise that there will be instances where unviable office floorspace should be considered for alternative uses.</p>	See Council's comments on respondent's representations on policy 21.
835	Tim Catchpole, Mortlake with East Sheen Society	Policy 23. Offices	We note the presumption against the loss of office space. It is not clear how the forecast shortfall in office space (100,000 m ² for the period 2019-2039) and the aim to achieve 40,000 m ² fit in with post-pandemic uncertainties surrounding demand.	See Council's comments on respondent's representations on policy 21.
836	Nina Miles, GLA on behalf of Mayor of London	Policy 23. Offices	Policy 23 seeks to protect office floorspace and direct major new office development into the five town centres and smaller scale office development to Key Business Areas. E1 LP2021 supports the focus of new office development in town centres however, the Key Business Areas should be supported by improvements to walking, cycling and public transport connectivity and capacity.	<p>Comment noted.</p> <p>Amendment to encourage active travel in relation to Key Business Areas, acknowledging that these are not always located in the borough's centres.</p>
837	Faye Wright, Forward Planning and Development on behalf of BMO Real Estate	Paragraphs 19.18 and 19.19	<p>These paragraphs make reference to marketing evidence being provided and we support the inclusion of this within the supporting paragraphs. We consider that reference should be made in paragraph 19.19 to listed buildings and a recognition that there may be heritage benefits arising from a change of use from offices to secure the long term viable future of a listed building.</p> <p>Suggested amendment:- We consider that reference should be made in paragraph 19.19 to listed buildings and a recognition that there may be heritage benefits arising from a change of use from offices to secure the long term viable future of a listed building.</p>	See Council's comments on respondent's representations on policy 21.
-		Policy 24. Industrial land		
838	Daniella Marrocco, ROK Planning on behalf of Shurgard UK Ltd	Policy 24. Industrial land	On behalf of Shurgard UK Ltd ('Shurgard'), we are writing to submit representations in relation to the London Borough of Richmond upon Thames Pre-Publication Draft Local Plan (Regulation 18).	The Employment Sites and Premises Needs Assessment has demonstrated that there is an ongoing shortfall in the availability of land for office and industrial uses in the borough. Given the low vacancy rates and high demand for industrial land


			<p>A Shurgard storage facility facilitates significant employment generation and further employment benefits. Analysis of the existing user demographic of Shurgard’s London portfolio demonstrates that 15-20% of customers are business customers, with a majority being small, start-up or local businesses and small medium enterprises (SME). As such, a Shurgard facility is considered a key economic benefit which assists local businesses, especially SMEs, flexibility and growth.</p> <p>These representations relate specifically to suggested amendments to the current drafting of Policy 24 Industrial Land and Policy 25 Affordable, Flexible and Managed Workspace.</p> <p>The purpose of these representations therefore is to ensure the draft local plan can be considered ‘sound’ with reference to the relevant tests set out in paragraph 35 of the NPPF. Specifically, the test of compliance with national guidance / strategic development plan is referred to.</p> <p>This will ensure the final draft local plan will accurately reflect the relevant provisions of the London Plan, particularly with regard to ensuring sufficient and suitable supply of land for employment uses is delivered / maintained where wider redevelopment via mixed-use intensification and co-location is planned.</p> <p>Policy 24 Industrial Land</p> <p>Part A of Policy 24 states that “<i>there is a presumption against loss of industrial land in all parts of the borough. Proposals which result in a net loss of industrial land will be refused</i>”. In his Directions to the Mayor, in relation to the Intend to Publish London Plan, the Secretary of State instructed the removal of the requirement of “no net loss” to existing industrial land as this was considered “an over-restrictive stance”. Therefore, in order to accord with the adopted London Plan, this requirement should be removed.</p> <p>As currently drafted, Part B of Policy 24 states that new employment floorspace of over 1,000sqm (gross) will be required to provide affordable light industrial workspace. It is considered the current drafting of this policy is ambiguous in that it does not state what proportion of employment floorspace will be required to be affordable. In addition, it is not clear where the 1,000sqm threshold has been decided and whether this is viable. The application of the 1,000sqm threshold should be tested and increased where identified to be unviable or unachievable. In addition, flexibility should be incorporated to allow an off-site contribution where provision of affordable workspace on suitable sites is not feasible. As such, it is recommended Part B of the policy is amended as per below (additions <u>underlined</u>):</p> <p><i>“The Council will require the provision of <u>a minimum of 10% affordable light industrial workspace (Use Class E(q)(iii))</u> within all major developments, over 1,000sqm of employment floorspace proposed (gross), in accordance with Policy 25 Affordable, flexible and managed workspace. <u>In exceptional circumstances where on-site affordable workspace is not feasible, the Council will accept a financial contribution for off-site affordable workspace.</u>”</i></p> <p>Part C(1) of Policy 24 states that “<i>major new development proposals for industrial space should be directed to identified Locally Important Industrial Land and Business Parks identified on the Policies Map</i>”. Supporting paragraph 19.41 states that the Employment Land & Premises Needs Assessment 2021 identifies a minimum net additional requirement for 60,000sqm or 15ha of industrial land for the period 2019-39 and that vacancy rates within the borough are 0.5%, well below the London average, which means the borough does not have existing capacity for future industrial demand.</p> <p>By directing new industrial floorspace only to identified LSIS locations the borough’s available land for industrial development is restricted and could prejudice delivery of land / floorspace to meet the identified significant industrial need. London Plan Policies E4 and E7 support additional industrial capacity and intensification of business uses across all three categories of industrial land – SIL, LSIS and non-designated. It is therefore considered that the Council should also support the development of non-designated employment sites and other suitable potential employment sites for employment generating uses to ensure the identified future industrial land targets are met. As such, it is recommended Part C(1) of the policy is amended as per below (additional <u>underlined</u>):</p> <p><i>“Major new development proposals for industrial space should be directed towards Locally Important Industrial Land and Business Parks as identified on the Policies Map, <u>other non-designated employment sites and other suitable sites in alternative use (assessed on a case by case basis).</u>”</i></p> <p>[See comment 846 in relation to Policy 25]</p>	<p>and floorspace in the borough, the requirement of no net loss is considered appropriate in the borough context.</p> <p>The requirement for developments over 1,000sqm (gross) to provide affordable workspace is appropriate and has been applied to developments under the adopted Local Plan policy LP 41, taking into account the guidance in the Richmond Planning Obligations SPD.</p> <p>Policy 25 (Affordable, flexible and managed workspace) includes detailed guidance on the proportion of affordable workspace that will be required as part of larger developments and the need for the developer to set out details of how the affordable workspace provision will meet the requirements of the policy on a case-by-case basis through a Workspace Management Plan. Guidance on off-site provision of affordable workspace is also provided in policy 25.</p> <p>Existing industrial uses outside the designated LILBPs will also be protected under policy 24. Other proposals on non-industrial sites will be considered on a case-by-case basis, taking into account other Local Plan priorities.</p> <p>No changes are proposed to the policy.</p>
839	Alexandra Bamford, Boyer Planning on behalf of Twickenham Film Studios	Policy 24. Industrial land	<p>Policy 24 – Industrial Land</p> <p>The policy aims to retain all industrial space across the Borough and seeks to support new industrial space where it meets the specified criteria.</p> <p>Part A) states that there is “<i>There is a presumption against loss of industrial land in all parts of the borough. Proposals which result in a net loss of industrial land will be refused. Any redevelopment proposals are required to contribute to a net increase in industrial floorspace. Any refurbishment of existing industrial floorspace should include traditional formats along with workspace for light industrial, through intensification as set out in London Plan Policy E7 part A</i>”.</p> <p>Part B) requires the provision of affordable light industrial workspace within all major developments, over 1,000sqm of employment floorspace proposed (gross), in accordance with Policy 25 Affordable, flexible and managed workspace. 3.12 Part C) of the policy states that the Council will support proposals for new industrial space by the following means:</p> <ol style="list-style-type: none"> 1) Major new development proposals for industrial space should be directed towards the identified Locally Important Industrial Land and Business Parks as identified on the Policies Map; 2) It can be demonstrated that new proposals would not adversely impact on the continued operation of other established employment uses within that site or on neighboring sites; 3) New industrial space is flexible and adaptable for different types of activities and suitable to meet the requirements of local businesses; and 4) Extensions to existing employment uses are of an appropriate scale in keeping with the surrounding area, role and function. <p>We are in support of all parts of the draft policy as the retention of industrial land is so crucial to the local and national economy.</p>	<p>Support for policy noted.</p> <p>Seeking designation of Arlington Works as Industrial Land and Business Park designation. However, part of the site is safeguarded as a waste site in the West London Waste Plan. As it is an existing employment site, proposals to change the use away from industrial would be assessed against the criteria in this policy which requires existing industrial land to be retained.</p>

			<p>The policy designates ‘Twickenham Film Studios, St Margaret’s’ as a ‘Local Significant Industrial Site’ in supporting paragraph 19.40. LSIS’s are “recognised for their importance locally in providing job opportunities and meeting local business needs. In the borough these are of particular importance for warehousing, distribution, storage and other industrial employment as well as locally important creative industries and other key employment facilities”.</p> <p>Importantly, supporting paragraph 19.42 highlights the recent loss in industrial stock within the Borough – “the Valuation Office Agency (VOA) recording a total stock of 163,000 sqm in 2015 falling to 156,000 in 2020”. This dramatic loss in industrial land has caused the Borough to become increasingly reliant on industrial and logistics space outside the Borough to service its population, which has wide ranging negative impacts on society, environment and economy.</p> <p>Recognising the emphasis that the policy places on retaining and supporting proposals for new industrial space, we recommend that the Council designates ‘Arlington Works, Arlington Works, Arlington Road, Twickenham, TW1 2BB’ within its Policy Map as a ‘Local Significant Industrial Site’.</p> <p>As outlined within Section 2 [See comment 499 in relation to the place-based strategy], the Inspector did not permit the change of use to mixed-use namely Residential (C3) and Commercial (then B Class, now E Class), and highlighted the importance of retaining Arlington Works in industrial use. It therefore seems fundamentally important to designate Arlington Works in the Policy Map as a LSIS to ensure that its remains in industrial use.</p> <p>Designating Arlington Works as an LSIS would not only comply with the draft policy’s aim to provide new industrial space across the Borough, it would potentially allow for the Studios to expand into the only site available.</p> <p>4. SUMMARY AND CONCLUSION</p> <p>We trust that our above comments are of assistance and that the Council will give due consideration to the changes that we have recommended, specifically to the proposed designation of the Arlington Works site as a ‘Locally Significant Industrial Site’ in their emerging Policy Map.</p> <p>The Studios’ remains keen to engage with the Council in respect of the emerging Local Plan as well as in connection with the permitted and proposed development and enhancement of the existing facilities at the Site and we would welcome the opportunity to meet with officers to discuss this Site’s expansion into the neighbouring site in more detail across the next phase of the preparation of the emerging Local Plan.</p>	
840	Tim Catchpole, Mortlake with East Sheen Society	Policy 24. Industrial land	<p>We note the presumption against the loss of industrial land and the paucity of industrial land in the MESS area. It is interesting to note the reference to the Big Yellow storage unit on the Lower Richmond Road, yet no mention of the potential loss of the Stag Brewery site.</p>	<p>Comments noted. Planning applications are currently being considered for Stag Brewery, which is included in the draft Local Plan as Site Allocation 34. It is stated in the Site Allocation that “it is expected that this site will provide a substantial mix of employment uses , including lower cost units suitable for small businesses, creative industries and scientific and technical businesses including green technology. Other employment generating uses will also be supported.”</p>
841	James Sheppard, CBRE, on behalf of LGC Ltd	Policy 24. Industrial land – LGC site	<p>4. Employment</p> <p>The draft Local Plan proposes to allocate the LGC site as ‘Locally Important Industrial Land and Business Park’ and we have assumed a ‘Key Business Area’ (noting LGC is not stated by name under paragraph 19.30). LGC understands the broad rationale of protecting these employment sites to ensure a sufficient employment land supply across the borough over the plan period, as evidenced in paragraph 4.15 of the draft Local Plan.</p> <p>However, we deem it crucial for the Council to further consider how these needs can be accommodated through mixed-use development. The indicative scheme presented to the Council, illustrates how a highly inefficient, sustainably located brownfield site can be redeveloped to increase job numbers from approximately 250 to a possible 850. This would constitute a substantial windfall of employment generation for LBRuT, whilst simultaneously achieving other policy aspirations such as affordable housing delivery. A mixed-use development would also achieve a wide range of placemaking objectives.</p> <p>The Council’s support of LGC, as is offered through the draft Local Plan, would culminate in the retention of LGC in the borough, thereby supporting its approximate 250 employees, some 50 per cent of which reside locally within LBRuT. Importantly, draft Policy 21 states that “the Council will seek to retain and attract investment from existing and emerging sectors to support the existing business base and create a diverse and enterprising local economy”. Draft Policy 22(A) goes on to state that “proposals for employment floorspace should support suitable workspace for the borough’s locally significant and diverse sectors, including those of particular importance to the borough’s local economy, namely (4) ‘scientific research and laboratory space’, and (2) ‘space to accommodate small and micro firms, for start-up, incubation and accelerator’.</p> <p>These sectors would be actively supported through a redevelopment of LGC’s site, through the development of modern, fit-for-purpose office and laboratory space and a third-party building accommodating mixed scale and sectoral employment uses, including affordable workspace.</p> <p>Indeed, a well-considered mixed-use proposal would align with a number of key employment policies. Draft Policies 21 and 23 seeks to protect existing floorspace for office and industrial use, with a no net loss approach. It has been demonstrated through illustrative masterplans for the site, presented to the Council, that this can be achieved through a more efficient and effective use of land. Draft Policy 21 goes on to promote the supply of affordable workspace to support small and medium sized enterprises, as identified in draft Policy 25, which would also be integrated into any mixed-use redevelopment scheme for the site.</p> <p>Draft Policy 24 however allows for little flexibility, constraining the Council’s ability to consider high-quality mixed-use schemes that deliver increases, both qualitatively and quantitatively, to employment floorspace, along with other planning and public benefit. The wording of draft Policy 24(A) states a “presumption against loss of industrial land”, continuing, “proposals which result in a net loss of industrial land will be refused”. We urge the Council to promote more flexible wording through draft Policy 24, that ensures no net loss of industrial floorspace and promotes net increases where feasible. This flexibility could be allowed for through deletion of “Proposals which result in a net loss of industrial land will be refused”. It can be demonstrated through</p>	<p>Note paragraph 19.30 amended to refer to National Physical Laboratory and LGC Ltd, Teddington.</p> <p>The site is designated as a Locally Important Industrial Land and Business Park. The Employment Sites and Premises Needs Assessment has demonstrated that there is an ongoing shortfall in the availability of land for office and industrial uses in the borough. Recent evidence from the GLA has also found that there has been a progressive decline in the industrial stock in London since 2021. Given the low vacancy rates and high demand for industrial land and floorspace in the borough, the requirement of no net loss is considered appropriate in the borough context. Proposals that are seeking re-provision of industrial land in alternative ways (for example through intensification/co-location of industrial uses) to enable mixed-use development will be considered on a site-by-site basis, taking into account other Local Plan priorities to determine if there are exceptional circumstances.</p> <p>Offices note the aspirations for the site to be redeveloped for mixed use including a significant amount of residential and this has been discussed at length through the Council’s pre-application process. A Site Allocation for mixed use is not considered appropriate at this stage given the significance of the site for employment provision in the borough (reflected in the ILBP and KBA designations which will be carried forward in the new Local Plan). This is more appropriate to be considered through the pre-application/application process where the proposed balance of uses can be assessed in detail.</p>

			<p>intensification, and a more efficient and effective use of land, that mixed-use developments can come forward in appropriate locations that lead to net increases in industrial floorspace, whilst meeting other policy aspirations.</p> <p>We refer to adopted Policy LP40 (1) of the adopted Local Plan which, although seeking the broad protection of employment land, stating “land in employment use should be retained in employment use for business, industrial or storage purposes”, an allowance is made under exceptional circumstances for mixed-use redevelopment. Policy LP40 (4) states “mixed use development proposals which come forward for specific employment sites should retain, and where possible enhance, the level of existing employment floorspace”. Policy wording for the draft plan should carry with it a degree of flexibility in exceptional circumstances.</p> <p>Crucially, the potential for a co-location of uses on locally important industrial sites is allowed for under London Plan Policy E7. London Plan Policy E7(B) states that “Development Plans should be proactive and consider, in collaboration with the Mayor, whether certain logistics, industrial and related functions in selected parts of LSIS could be intensified”. Policy E7(B) goes on to state, “Intensification can also be used to facilitate the consolidation of an identified LSIS to support the delivery of residential and other uses”. The policy states that this approach should only be considered as part of a plan-led process of LSIS intensification and consolidation (and the areas affected clearly defined in Development Plan policies maps) or as part of a co-ordinated master planning process in collaboration with the GLA and relevant borough. In LSIS the scope for co-locating industrial uses with residential may be considered”.</p> <p>LGC considers that any plan-led co-location of uses can be achieved whilst ensuring that those criteria set out in Policy E7(D) can be met.</p>	
842	Nina Miles, GLA on behalf of Mayor of London	Policy 24. Industrial Land	<p>We acknowledge that the Employment Land and Needs Assessment 2021 identifies a need to accommodate growth of 60,000sqm/15ha (100 industrial jobs) per annum but recognises few options to address this deficit. The approach to protecting existing industrial land in Policy 24 will help to protect existing floorspace and potentially provide a net increase through redevelopment and intensification as supported by Policy E7 LP2021.</p>	Support for policy approach noted.
843	Charlotte Orrell, DP9 Ltd on behalf of London Square Developments	Greggs Bakery: Introduction and background of the Background of the Site Promotion for Residential –	<p>These representations relate to the Greggs Bakery, Gould Road, Twickenham, referred to as ‘the Site’. Our client has an interest in the Site which is owned by Greggs PLC (hereafter ‘Greggs’).</p> <p>Introduction</p> <p>The existing Site comprises the former Greggs Bakery Site in Twickenham, within the London Borough of Richmond Upon Thames. The Site is L-shaped and is bound by the River Crane to the north and railway line beyond, residential properties on Norcutt Road to the east, Edwin Road to the south, residential properties on Crane Road to the west and further residential properties on Crane Road/ Gould Road and at Crane Mews to the north-west.</p> <p>There are a range of buildings covering the Site which comprises an area of 1.1ha. The majority of the Site is covered by a single storey industrial shed, which extends close to the full width of the site, alongside large extract equipment. There are also a number of associated two and three storey commercial buildings across the remainder of the Site which have developed in a piecemeal way over time. The existing buildings have reached the end of their life cycle and are unsuitable for alternative industrial uses, and the site is now fully vacant. The site is subsequently deemed surplus to Greggs’ requirements and Greggs have moved their operations to a more suitable Site due to the long-standing highways, access and amenity issues associated with this location.</p> <p>Background of the Site Promotion for Residential</p> <p>The Site is currently allocated within the ‘Locally Important Industrial Land and Business Park –West Twickenham Cluster (including Greggs Bakery and surroundings), Twickenham’ under the adopted Local Plan. The Site also falls within the ‘Key Office Area – West Twickenham Cluster’ under the adopted planning policy position.</p> <p>The Site has been promoted for residential-led redevelopment and it has been demonstrated that the Site is inappropriate for continued industrial use, over a number of years as part of the consultation process to both the adopted Local Plan (July 2018) and the emerging Local Plan. A summary of the previous representations are included below for background. The constraints of the Site remain unchanged, and unresolvable and we continue to maintain that the employment designation is inappropriate for the Site.</p> <p>Prior to the adoption of the current Local Plan in July 2018, the LBRuT published the Local Plan ‘Site Allocations Plan’ for consultation. Within this, draft Policy TW 11 (West Twickenham cluster, Twickenham) identified the Site for “Mixed residential, start-up and small-scale hybrid business space and/or primary school. Proposed Designation as key employment site.” This document was not taken forward and was superseded by the adopted Local Plan (July 2018), however this represents the borough’s initial approach to the Site’s redevelopment which considered a mixed-use scheme to be more appropriate in this location and where employment is retained, for this to be of small-scale business space rather than larger scale industrial. Representations were made by the Site owner to the currently adopted Local Plan (July 2018). It was thoroughly demonstrated that the Site is inappropriate for continued employment use and this position was supported by the Council’s own evidence base assessment (Employment Sites & Premises Study, 2017 prepared by Peter Brett Associates). The report identifies the ‘West Twickenham Cluster (including Greggs Bakery and surroundings)’ as a designated site that is “less attractive to occupiers” and identifies it as being “constrained by poor access, particularly for HGV’s, and by its residential surrounds”. Paragraph 3.10 of the Study states that the West Twickenham Cluster is “located within residential areas like many of Richmond’s industrial sites, but they also have particularly poor access arrangements that significantly constrains their potential for redevelopment for alternative forms of industrial use.”</p> <p>Despite the locational disadvantages identified within the LBRuT Employment Sites and Premises Study (2017), which formed part of the Council’s evidence base, the Site was allocated (as part of the 2018 adopted plan) within the ‘West Twickenham Cluster (including Greggs Bakery and surroundings)’ which seeks to protect the use of the land for employment. This policy is also contrary to the fact that the existing site is vacant and all former bakery operations have been re-provided elsewhere. The</p>	<p>The comments are site-specific and relate to recent applications and pre-apps. The site is being promoted for residential-led mixed-use development.</p> <p>The designation of the site as a Locally Important Industrial Land and Business Park reflects the existing uses on the site the Council’s priority that these are protected as part of redevelopment proposals.</p> <p>The approach to protecting industrial land is considered to be consistent with the London Plan. No issues relating to non-conformity of policy 24 were raised by GLA officers in response to the Regulation 18 consultation. Recent evidence from the GLA in the London Industrial Land Supply Study 2020 has found that there has been a progressive decline in the amount of industrial stock across London since 2001 and vacancy rates for industrial land uses remain very low. Floorspace vacancy rate in 2021 for Richmond was found to be 0.4% (vs a 10-year average of 1.4%). This gives weight to the priority of the Council to protect existing industrial floorspace.</p>

			<p>re-use of the existing buildings on site for employment use is also not viable or feasible as they are in a poor condition and require modernisation to meet modern business standards.</p> <p>Representations were submitted in relation to the Local Plan Direction of Travel Consultation and Call for Sites in March 2020 which demonstrated why the Site continues to be inappropriate for industrial use. Documents supporting the lack of suitability for industrial use were supplied to the Council as part of this submission and that evidence and supporting information can be re-provided to officers dealing with the draft Local Plan as necessary.</p> <p>Most recently, the Site was the subject of a planning application (ref. 19/0646/FUL) for residential-led redevelopment. The application was refused on 7th August 2020 on the basis of the loss of industrial floorspace and the lack of a S106 Agreement to secure review mechanisms for affordable housing. This application further outlined and evidenced why the Site was constrained and appropriate for residential-led development through the submission of site-specific documents and Transport Assessments, however these have not been considered in the draft policy position. Such documents can be re-provided to the officers dealing with the local plan if required or considered necessary.</p> <p>It is the applicant and their team's firm position that the Site is inappropriate for industrial use and the Site has been consistently promoted for residential led development by both the applicant and the land owner. Positive consultation feedback during the planning application process from neighbours and local ward councillors also indicated that residential use would be their preferred use of the site due to its reduced impact on neighbouring amenity and character by way of potential noise, pollution, appearance and traffic.</p> <p>Comments on the 'Pre-publication' Draft Local Plan</p> <p>These comments principally relate to (1) the site's proposed designation for industrial use, which we consider to be contrary to Council's strategic objectives and reflect a failure to recognise the site's unsuitability for employment, and (2) the inconsistencies between the LBR's Draft Local Plan (as worded) and the London Plan (2021) meaning that these draft policies fail to meet the tests for soundness set out in the NPPF.</p>	
844	Charlotte Orrell, DP9 Ltd on behalf of London Square Developments	Policy 24 - Retention of industrial space	<p>As set out above [See comment 843 in relation to the background on the site], the Site was put forward under the Call for Sites in March 2020 as an appropriate Site for residential-led development. The Council's 'Schedule of sites not taken forward as Site Allocations in the new Draft Richmond Local Plan' sets out that the Greggs Bakery site was identified by both the respondent, along with other residents. However, it is the Council's position that <i>"the loss of industrial floorspace would have a detrimental effect on the ability to meet future needs for employment land."</i> The Draft Local Plan therefore sets out that the West Twickenham Cluster (including Gregg's Bakery and surroundings) continues to be allocated as a Locally Important Industrial Land and Business Park. We object to the inclusion of this Site as a designated Locally Important Industrial Land and Business Park and note that part of the Cluster has already been permitted for residential use Lockcorp House (LPA planning application ref: 19/2789/FUL). We assert that the Greggs site is unsuitable for large scale employment use and that future needs for employment land in the borough can be met through other sites or even the mixed use redevelopment of the site (i.e. co-location).</p> <p>The Employment Land and Premises Needs Assessment (ELPNA)(December 2021) prepared by Stantec which forms the Local Plan evidence base, indicates that there is positive industrial demand but a lack of space for logistics firms. A continued strong employment land protection policy is therefore recommended on this basis and draft Policy 24 sets out a presumption against the loss of industrial land in all parts of the borough. We maintain that only appropriate sites should be protected and, where it is demonstrated that continued employment floorspace is not appropriate, and that there is no reasonable prospect of a site coming forward for the use allocated in a plan, it should be released and reallocated for a more deliverable use that helps to address another identified need in the borough in accordance with paragraph 122 of the NPPF. The policy should therefore make allowance for Sites that meet these tests. The ELPNA also identifies other potential sources of employment land which are not acknowledged in the draft Local Plan – these include the release of the Council's own assets and the use of retail units that can be repurposed as flexible workspaces. As such, it cannot be demonstrated that any under-provision of employment floorspace on the Greggs site will affect the borough's capacity to address future employment needs.</p> <p>The Policy does not appear to be supported by an updated Sites and Premises Study which assesses individual Site Constraints and site suitability for the priority employment sectors identified in the ELPNA. This draft policy therefore fails to meet the tests of soundness in the NPPF – being inadequately prepared and inconsistent with national and regional policy which seek a more balanced and considered approach to the redevelopment of former and vacant industrial sites. The evidence base in particular comprises just the Employment Land and Premises Needs Assessment, and therefore the protection of the Greggs Site is based upon a need for industrial floorspace, rather than a consideration of the specific site issues. Nevertheless, the conditions of the Site have not changed since the London Borough of Richmond Employment Sites and Premises Study (2017) was published. This identifies in relation to the Greggs Site that <i>"The site is bounded by residential uses. Crane Road is primarily residential road which means that operating hours, types of industrial activity and access are constrained. The current use experiences issues with HGV access"</i>. The Site is identified as having poor compatibility with surrounding neighbours and poor access via residential roads with resident's parking on both sides. It further sets out that <i>"The departure of Greggs presents an opportunity to redevelop a large site. However, the layout and location of the site has a number of constraints including access, hours of operation and the types of industrial activity permitted limiting the amount of employment floorspace that could be delivered. Redevelopment of the site would realistically be through a mixed use scheme. The northern part of the site, fronting the River Crane, is the most suitable area for employment use."</i></p> <p>As identified by LBRuT, the use of the Site by Greggs as a bakery generated a significant level of daily HGV movement on the local highway. The streets surrounding the Site are narrow residential streets, intended to be used for residents to park their cars and are often heavily parked on both sides. The presence of HGVs on the residential street resulted in severe highways impacts including damage to parked cars. There is also evidence of damage to footways and kerbs where HGVs have had to mount the pavement. This also presents a safety risk for other road users and pedestrians. Local complaints of noise and poor air quality as</p>	<p>See response to representation 843 above.</p> <p>The 'no net loss' approach to industrial land is appropriate given the context of the borough and evidence of an ongoing shortfall.</p> <p>The nature of the borough means that many of the existing commercial uses are located in residential areas and this is not a justification in itself for the loss of a commercial site. The policy is informed by the evidence which has identified a need to protect existing employment sites.</p>

		<p>a result of the presence of HGVs accessing the Site have also been reported. Greggs Bakery benefits from an unrestricted consent, meaning deliveries and servicing to and from the Site took place throughout the day including early in the morning and late in the evening and could continue to operate in this manner if occupied again by a business falling within the same use class. Twenty four access to the site (and the ability to operate at all hours) will also be required for a future employment use. As demonstrated by the Site’s planning history, there were a number of attempts to ameliorate the noise impacts of the bakery operation on the neighbours over the years. Despite the careful management of the bakery by Greggs and the acoustic measures implemented, the continued industrial use had a negative impact on neighbouring amenity and contributed to Greggs’ decision to relocate to a purpose-built facility in a more accessible and appropriate location (i.e. one not within a residential area). The existing industrial buildings are also incongruous in a residential setting and by occupying the full width of the site (which is necessary to maximise yard space and access), these buildings provide poor outlook to adjoining residential dwellings along Crane Road and Norcutt Road. These concerns would be addressed by a residential-led scheme which would incorporate gardens and increased separation distances compared to existing.</p> <p>Policy 24 sets out that proposals resulting in a ‘net loss’ of industrial land will be refused and that development proposals are required to contribute to a ‘net increase’ in industrial floorspace. The inclusion of the wording ‘shall be refused’ is not reflective of the balanced approach advocated within the NPPF and specifically within paragraphs 8 and 122 regarding employment provision. It is our opinion that the Policy fails to take into account whether an existing employment use on the site is appropriate, fit for purpose and of sufficient quality. The blanket policy simply focuses on quantum of floorspace and thereby could lead to scenarios where employment land is retained which remains inappropriate, unlet and discourages redevelopment. As set out above, the no ‘net loss’ approach is also not consistent with the London Plan and neglects considerations relating to the intensification or quality of industrial floorspace in a future scenario – the latter which would be significantly worse if a no “net loss” of floorspace was pursued on the Greggs site due to the aforementioned site constraints and the site footprint. The ‘no net loss’ approach has previously been tested by the Council as part of the 2018 Local Plan, where it’s inclusion was removed during the Examination process. The Examining Inspector to that Plan found the ‘no net loss’ approach to be unsound and in need of modification to “ensure flexibility and soundness” (Paragraph 100 of Inspectors Report). The reason the Inspector requested the additional flexibility within the 2018 Local Plan, but due to the principle that flexibility is required for soundness, notwithstanding the need to abate a loss of employment land. This principle still applies to the preparation of the current draft Local Plan.</p> <p>Opportunities for a change of use on site which does not adhere to the aforementioned policy are contained within the subtext to Policy 24. These opportunities are significantly constrained and absolute, meaning exceptions to the policy and discretion by the Council to unique site circumstances would be extremely limited. Furthermore, any exception or qualification to the policy should be made clear within policy text and should not sit within supporting narrative. On that basis, we recommend that the following text on exceptions is incorporated into draft Policy 24:</p> <p>‘The loss of industrial land will be supported where:</p> <ul style="list-style-type: none"> • There is no reasonable prospect of the site being used for industrial and related purposes; • The continued use of the site for industrial purposes would fail to comply with Local Plan policy requirements specifically relating to; <ul style="list-style-type: none"> ▪ Access ▪ Service and delivery arrangements ▪ Vibration and noise impacts ▪ Air quality, including dust, odour and emissions and potential contamination ▪ Safety and security ▪ Agent of change principles’ <p>London Plan Policies E4, E6 and E7 also make clear that the scope for co-locating industrial uses with residential and other uses may be considered on LSIS. The draft Local Plan Policy does not allow for the provision of this and is therefore inconsistent with the London Plan. The draft policy should therefore be updated on this basis.</p> <p>Paragraph 7.10 of the Employment Land and Premises Needs Assessment identifies Greggs as a site for redevelopment for employment uses and suggests that the current floorspace could be re-accommodated and net additional floorspace secured as far as practical. However, the report then goes on to acknowledge in relation to the Greggs site that “<i>the density may be limited due to nearby residential properties, and also that access will limit the number and possibly the type of vehicles that can access the site.</i>” It is also further acknowledged at paragraph 5.24 that “<i>the intensification potential for the site is limited as it is already intensively developed.</i>” The policy suggestion that the current floorspace could be re-accommodated and net additional floorspace secured is therefore unfounded and contrary to the evidence base.</p> <p>The current Site comprises a large industrial shed which fills the majority of the Site in close proximity to the neighbouring residential dwellings. There is currently inadequate parking or turning circles for large vehicles. Therefore, the Site cannot accommodate intensification and given the site constraints, the quantum of floorspace that could be delivered as part of any employment redevelopment would be severely reduced. Furthermore, advice from agents confirms that modern commercial accommodation needs to accommodate car parking, double height workspace for fork-lift access and turning circles for 7-tonne plus lorries. The Greggs Site cannot accommodate this grade of floorspace. As such, the assumption in the evidence base that the Site could deliver 7,082 sqm of employment floorspace is wholly inaccurate. The reliance that the Employment Land and Premises Needs Assessment places on the Greggs site for a significant level of industrial floorspace is therefore disputed. The report also identifies that without the Greggs site, the borough has a 7-month supply of industrial floorspace, which increases to 5-years and 2-months when the Greggs site is included. This is based on available floorspace, however in reality, the loss of Greggs Site results in the loss of a single industrial unit, which has been vacant for a number of years. Importantly, the</p>	
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845	Henry Carling, Kandahar (Jackson Square) Ltd	Chapter 19, Paragraph 19.40 (in relation to Marlborough Trading Estate, Mortlake Road, Kew)	<p>This paragraph states that the site known as Marlborough Trading Estate, Mortlake Road, Kew has been designated by the Council as 'Locally Important Industrial Land and Business Parks.' This designation does not accurately reflect the established lawful use of the site. Application Ref. No. 18/1233/ES191 for a Certificate of Lawful (Existing) Use, which was determined on 20 June 2018, confirmed that the established uses within the site were for B1 (office) and B8 (warehouse). In other words, the site contains a mix of employment uses. As such the designation of the site as a 'Locally Important Industrial Land and Business Park' does not reflect its lawful use. Rather it is a 'mixed use' employment site. It therefore does not conform with either this or the 'Key Business Areas' designation.</p> <p>We are also mindful of the conclusions drawn in the latest evidence as provided by the London Borough of Richmond upon Thames 'Employment Land and Premises Needs Assessment' December 2021 (paragraph 7.13) state that, with regard to 'other protected industrial sites':</p> <p>'The remaining reservoir of sites is generally too small to warrant specific policies or allocations - all being below 1 ha and many below 0.5 ha.'</p> <p>The site is some 0.6 ha in size. We would therefore request that the designation of Marlborough Trading Estate, Mortlake Road, Kew as a 'Locally Important Industrial Land and Business Park' is deleted. As protection of employment floorspace is already provided for through Policy 21 such an approach would not undermine the Council's overall objective of seeking to protect existing employment uses and would still be in general conformity with the London Plan 2021.</p> <p>The use of the name 'Marlborough Trading Estate' is historic and does not reflect its authorised existing use. It is therefore requested that '159 Mortlake Road' is used if there is any reference made to the site in any Council documentation.</p>	<p>Note request to refer to site as 159 Mortlake Road – this has been amended in the policy.</p> <p>Note earlier comments under rep no. 818 refer to the binary nature of the employment policies that distinguish between office and industrial uses and lack of flexibility for different uses on employment sites where these have an Industrial Land and Business Park designation.</p> <p>Distinguishing between office and industrial uses follows the Use Classes Order, as well as the London Plan and NPPF.</p> <p>The historic use of the site and mix of existing uses are considered appropriate for ongoing designation for industrial use. The ongoing designation as a Locally Important Industrial Land and Business Park reflects the updated employment evidence which identifies an ongoing shortfall in industrial land in the borough. Although the designation prioritises the protection of the existing industrial uses, it does not preclude other complementary commercial uses. Class E may also provide greater flexibility in the use of those parts of the site that do not have an established B8 use. It is a priority of the Local Plan to retain land in storage use as part of the supply of industrial land in the borough.</p> <p>Note the reference to 18/1233/ES191 which established the use of the site was offices and warehousing.</p>  <p>(Note: 18/1233/ES191 was for "Use of property as warehouse and offices (offices marked in green on drawing JGR1)"</p>
-		Policy 25. Affordable, flexible and managed workspace		
846	Daniella Marrocco, ROK Planning on behalf of Shurgard UK Ltd	Policy 25. Affordable, flexible and managed workspace	<p>[See comment 838 in relation to Policy 24]</p> <p>Policy 25 Affordable, Flexible and Managed Workspace</p> <p>Policy 25 Part B(4) states that provision of affordable workspace will be required within major developments with over 1,000sqm of proposed employment floorspace (gross). The wording of this policy differs slightly from Part B of Policy 24 in that Policy 25 requires "affordable workspace" only compared to "affordable light industrial workspace" in Policy 24; this should be clarified. In addition, it is considered the current drafting of this policy is ambiguous in that it does not state what proportion of employment floorspace will be required to be affordable and at what rate of affordability within the policy wording; whilst this is included within the supporting text, it is considered it should also be included within the policy wording to ensure clarity. It is also not clear whether the 1,000sqm threshold is viable. The Employment Land Review (2021) states the existing affordable workspace policy retains the 1,000sqm trigger and discusses the need to expand the policy from office only to any business use,</p>	<p>Policy 24 contains the reference to 'light industrial workspace' to avoid doubt that on existing industrial sites this will be the type of affordable workspace that is expected to be provided. The reference to affordable workspace in policy 25 is over-arching and includes all employment sites where this may be required.</p> <p>Supporting text to the policy includes details regarding threshold and targets for affordable workspace in major developments.</p>

			<p>as the delivery of office space is lacking; however the Review notes that it is not a specific workspace evidence base document and viability testing has not been undertaken. The application of the 1,000sqm should be tested and increased where identified to be unviable or unachievable.</p> <p>Flexibility should be incorporated to allow an off-site contribution where provision of affordable workspace on suitable sites is not feasible. As such, it is recommended Part B of the policy is amended as per below (additions <u>underlined</u>):</p> <p><i>“Requiring the provision of <u>a minimum of 10% affordable light industrial workspace (Use Class E(a)(iii)) within all major developments with over 1,000sqm of employment floorspace proposed (gross). Affordable workspace will be required at 80% of local market rates for a minimum of 15 years, to be secured through planning obligations. In exceptional circumstances where on-site affordable workspace is not feasible, the Council will accept a financial contribution for off-site affordable workspace.”</u></i></p> <p>Conclusion</p> <p>Shurgard consider amendments are required to Policies 24 and 25 of the Richmond Pre-Publication Draft Local Plan to ensure clarity within the policy requirements and accordance with the London Plan. This, in turn, ensures the emerging Local Plan can be considered sound as identified in NPPF Paragraph 35.</p>	<p>All the policies in the Plan have been subject to viability testing, including Policy 25 as set out in the Whole Plan Viability Study, and viability will also be considered on a case-by-case basis.</p> <p>Paragraph 19.61 provides guidance regarding circumstances where an off-site contribution to affordable workspace may be acceptable. The priority of the Local Plan is for this to be provided on-site due to the difficulties in identifying and delivering it in alternative locations.</p> <p>No changes are proposed to the policy.</p>
847	Henry Carling, Kandahar (Jackson Square) Ltd	Policy 25 (Affordable, flexible and managed workspace)	<p>It is noted that Part B (3) to the policy does not provide any threshold as to when securing the appointment of managed workspace providers will be required but rather only refers to 'new business space'. This would suggest that proposals for the provision of even a minor amount of new floorspace as an extension to an existing premises would be subject to this requirement. This would be unworkable in practice and could impact on the viability of a site or premises. The inclusion of a threshold should be provided and/or it should be made clear that this would not apply to extensions to existing premises.</p>	<p>Managed workspace is one of the ways in which affordable workspace can be delivered, however it does apply to all circumstances. Further guidance on proposals that include managed workspace is in the supporting text to the policy, and in the Planning Obligations SPD.</p> <p>The threshold of 1,000sqm for the provision of affordable workspace is based on gross floorspace and may therefore also apply to extensions to existing premises.</p> <p>No changes are proposed to the policy.</p>
848	Tim Catchpole, Mortlake with East Sheen Society	Policy 25. Affordable, flexible and managed workspace	<p>We agree with the aims set out.</p>	<p>Support noted.</p>
849	Nina Miles, GLA on behalf of Mayor of London	Policy 25. Affordable, flexible and managed workspace	<p>We note that Richmond identifies creative industries as an area of specialisation for the borough’s economy which is characterised by a large proportion of micro-business units and that there is a limited availability of stock of affordable, flexible ‘studio workroom’ units and ground floor light industrial and larger industrial units. Policy 25 seeks to protect existing affordable workspace and requires the provision of new in accordance with Policy E3 LP2021. This is welcomed, although Richmond should ensure that this is supported by local evidence in accordance with E3 Part C and in the circumstances outlined in Part B.</p>	<p>General support noted.</p> <p>London Plan E3 requires affordable workspace policies to take into account local evidence of need and viability and consider if there are locations in the borough where the provision of affordable workspace would be necessary or desirable to sustain a mix of businesses or cultural uses that contribute to the character of an area.</p> <p>The Employment Land and Premises Needs Assessment included an assessment of the need for affordable workspace in the borough. The findings of the evidence base have informed the policy. It is noted in the supporting text that rents for co-working space and serviced offices in the borough have been found to be quite high and more equivalent to the fringe of central London than outer boroughs.</p> <p>Part B.1. of policy 25 directs new affordable workspace provision to the borough’s town centres. This does not preclude it’s provision within major developments that may not be located outside the town centres given the limited opportunities to secure this type of provision in Richmond and its accessibility to different active travel modes.</p> <p>It is the nature of sites in Richmond that the opportunity to deliver affordable workspace is limited as large developments come forward relatively infrequently, compared with other boroughs. As such, and this is considered on a site-by-site basis. It is noted that large parts of the borough are accessible and there remains the possibility of off-site contributions to affordable workspace in exceptional circumstances.</p>
850	Charlotte Orrell, DP9 Ltd on behalf of London Square Developments	Policy 25 - Affordable Workspace	<p>We appreciate the supportive stance toward smaller-scale businesses and accordingly the intended delivery of affordable workspace within the borough in accordance with London Plan Policy E3. London Plan Policy E3 states that ‘<i>Boroughs, in their Development Plans, should consider detailed affordable workspace policies in light of local evidence of need and viability.</i>’</p> <p>In its current format, Policy 25 does not provide adequate detail in terms of specific affordable workspace targets. A suggested minimum target for developments proposing over 1,000 sqm is contained within the supporting text only, and is not supported by a detailed evidence base. Furthermore, the policy provides no provisions to take into account site specific viability information. As per other London Boroughs, the affordable workspace policy should allow the Council to accept a level of affordable workspace that sits below policy requirements in exceptional circumstances and where it is robustly justified, including through viability information. On this basis, we disagree with the Council’s assertions that Policy 25 is in accordance with London Plan Policy E3 and ask that this policy is amended to provide clarity on any evidence-based target requirements and to incorporate opportunities to consider site specific circumstances and viability information.</p>	<p>The Employment Land and Premises Needs Assessment included an assessment of the need for affordable workspace in the borough. The findings of the evidence base have informed the policy.</p> <p>Local Plan policies have been subject to viability testing and evidence relating to viability of specific developments is considered on a site-by-site basis.</p> <p>No changes are proposed to the policy.</p>
-		Policy 26. Visitor economy		

851	Theresa Oddelm, The Royal Parks	Policy 26 Visitor Economy	As important visitor attractions within the Borough, we would like to see Richmond and Bushy Parks specifically included within this policy in the context of The Royal Parks being supported in providing the necessary infrastructure to support visitor numbers.	The importance of the Royal Parks to the borough is accepted. However, the list of attractions included in Section A1 of Policy 26 is not exhaustive and would encompass the Royal Parks.
852	Tim Catchpole, Mortlake with East Sheen Society	Policy 26.Visitor economy	There is some potential for expanding this within the MESS area. This is associated with the river, the Stag site, the Sheen Lane Community Centre, Richmond Park plus the local and passing trade demands for higher quality seating and al fresco areas particularly making use of Milestone Green and the extremely wide pavements along sections of the Upper Richmond Road West, for example adjacent to Connaught Avenue and Paynesfield Avenue. However, any such seating needs to be assessed in terms of exposure to traffic pollution.	Noted.
853	Melanie Gurney, The Planning Lab, on behalf of the Royal Botanic Gardens	Policy 26	RBGK welcome Policy 26 (Visitor economy), particularly part (1) of the policy which supports proposals that promote and enhance the borough's existing tourist attractions, including Kew Gardens as well as other historic and cultural assets that are connected via the River Thames. RBGK also note part (2) of the policy, which requires proposals that lead to increased visitors and tourists will be assessed against the transport policies of this Plan. RBGK highlight that the nature of the offer at Kew Gardens means that there are regular events throughout the year that lead to increased visitors at certain times. This is how the organisation has functioned over many years; and is an essential part of its visitor attraction remit. These events are of great public benefit. Provisions for temporary events of this nature could, therefore, be considered and legislated for in the plan (see comments under policy 32). [See comment 898]	Noted. The approach towards temporary events at RBGK is considered in the Council's response to Policy 32. The Council recognises the importance of temporary events to the prosperity of RBGK. However, each event is assessed individually through the planning process which is appropriate considering the planning constraints of the site.
854	Hannah Blunstone, CBRE on behalf of Rugby Football Union (RFU)	Policy 26.Visitor economy	As drafted, Policy 26 does not reference Twickenham Stadium or its role in the visitor economy. We would request that the stadium is added to the existing attractions that the borough will support, promote and enhance. We suggest that Part A of this Policy (p.220) is updated as follows (amendments in red/strikethrough). <i>A. The Council will support the sustainable growth of the visitor economy for the benefit of the local area by:</i> <i>1. supporting proposals which promote and enhance the borough's existing tourist attractions, including the unique, historic and cultural assets that are connected via the River Thames, such as The Royal Botanic Gardens, Kew, Ham House and Hampton Court Palace;</i> <i>2. proposals that lead to increased visitors and tourists need to be of an appropriate scale for the size of the centre and will be assessed against the transport policies of this Plan;</i> <i>3. requiring accommodation and facilities to be accessible to all; either 10% of hotel bedrooms should be wheelchair accessible or 15% of new bedrooms to be accessible rooms as set out in London Plan Policy E10;</i> <i>4. enhancing the environment in areas leading to, within and around visitor destinations where appropriate;</i> <i>5. supporting the Cultural Quarters in Richmond and Twickenham and other existing clusters of cultural facilities and creative industries, particularly in town centres, and where ancillary facilities are proposed that are open for public use (such as restaurants, gyms and conference facilities).</i> <i>6. supporting appropriate development at Twickenham Stadium which complements the use of the site as an internationally significant sports and entertainment venue.</i>	The importance of Twickenham Stadium to the borough is accepted and recognised by the Council. However, the list of attractions included in Section A1 of Policy 26 is not exhaustive and would encompass Twickenham Stadium. An additional criterion is unnecessary as the Council's intention of supporting sustainable growth of the visitor economy is clear.
855	Katy Wiseman, National Trust	Policy 26. Visitor economy	The National Trust are the owners and custodians of several assets within the Richmond Borough, including Ham House and Gardens, Petersham Meadows and East Sheen Common. We welcome the opportunity to comment on the draft Richmond Local Plan 'The best for our borough' at Regulation 18 and wish to make the following comments. Ham House and Gardens is set back from the River Thames in Richmond and includes a rare 17th Century mansion which is a grade I listed building and a range of outbuildings all set within a large garden. Ham House is a significant visitor attraction and local asset within the borough of Richmond, and we therefore support Policy 26 which seeks to support the sustainable growth of the visitor economy for the benefit of the local area. This policy aligns with paragraph 81 of the NPPF which requires planning policies to proactively encourage sustainable economic growth. We particularly support criterion A1. as it supports proposals which promote and enhance the borough's existing tourist attractions, and we are pleased that the Council has recognised Ham House within the policy wording. We also support criterion A4. as it recognises the importance of approaches to and from visitor destinations and their setting to the overall visitor experience.	Noted.
856	Stephen Brooker, Walsingham Planning, on behalf of Whitbread Plc	Policy 26. Visitor economy	General support for the visitor economy is welcomed. Sections A & B both give generalised support for new proposals, eg additional visitor bedspaces, but then refer back to other Local Plan policies which seek to impose restrictions which might make many such proposals unacceptable. Whilst this is, of course, acknowledged to be necessary on matters of detail and individual site considerations it also seeks to impose wider locational criteria policies. For example, strict interpretation of the policy would potentially restrict the addition of bedspaces in an otherwise perfectly acceptable scheme at any existing location that happens to be outside of a town or district centre. The development or redevelopment of existing sites should be recognized as an important opportunity not to be precluded in principle by other policies in the Plan. Page 221, Para 19.62 - 67, in particular 19.64 should also recognize the point made above. Change considered necessary: ADD words to b[2] so that it reads as follows: "proposals which increase the number of bedspaces will be supported, including developemnt and redevelopment of existing visitor accommodation sites, subject to other LocalPlan policies"	The suggested text does not add to the clarity of the plan, since any proposal to increase bedspaces on existing sites, although supported in principle, would be subject to other plan policies including those relating to the acceptability of location and wider transport issues.
-		Policy 27.Telecommunications and digital infrastructure (Strategic Policy)		

857	Gary Backler, Friends of the River Crane Environment (FORCE)	Policy 27.Telecommunications and digital infrastructure (Strategic Policy)	We support the Council's policy "to ensure that new telecommunications infrastructure is sited appropriately and that the number of sites used is minimised where possible." We are opposed in principle to the siting of such infrastructure within the Crane corridor. Although the corridor may offer a lower financial-cost solution for the operator, such infrastructure will intrude visually and conceptually into its tranquillity.	Support for policy noted. Opposition to the principle of telecoms infrastructure in the Crane corridor is not a comment on the draft policy. Any future planning application would be subject to relevant policies relating to character, design and ecology elsewhere in the Plan. The wording of Policy 27 with regards to 'appropriate siting' is therefore considered to be sufficient.
858	Tim Catchpole, Mortlake with East Sheen Society	Policy 27.Telecommunications and digital infrastructure (Strategic Policy)	We note that the new wave of aerial masts is associated with 5G. We have had seven applications for aerial masts in our area in the past two years and none of them have been accompanied by adequate visual impact studies including photomontages. We would like to see this policy make a request that all applications should include such studies. We have been undertaking such studies ourselves in order to assess the impact, but it should be the role of the promoter, not the local community, to do this.	Whilst photomontages are always helpful in the submission of any planning application, they are not usually essential to make an informed planning judgement on the visual impact of a scheme. The Council's planning decisions for recent telecommunications masts are all considered to be sound with regards the officer assessment of visual impact. It would therefore not be reasonable to make the submission of a photomontage a blanket planning policy requirement. Where a planning officer feels that the submission of this information is essential to make a decision on the application, this would be requested as part of the planning application process.
859	Louise Fluker, The Richmond Society	Policy 27.Telecommunications and digital infrastructure (Strategic Policy) and paragraphs 19.72 & 73	we support the Council's position	Support noted.
-		Protecting what is special and improving our areas (heritage and culture)		
-		Policy 28. Local character and design quality (Strategic Policy)		
860	Graeme Fraser-Watson, The Teddington Society (Planning Group)	Shopfronts (Section 20 Protecting what is special and improving our areas (heritage and culture)	We are pleased to see that the council will resist the removal of shopfronts of architectural or historic interest and that shopfronts including signage and illumination should complement the proportions, character, material and detailing, surrounding street-scene and the buildings of which they forms a part. We know, from experience, that many owners, leaseholders (existing and future ones) are not aware that this is the case, nor are they advised about this by the local estate agents. Is there some way that the local plan can ensure this can be properly and regularly communicated to the interested parties ?	The Local Plan makes reference to the Shopfronts SPD which provides detailed design guidance for shopfronts in the borough. Enforcement action can be taken by the Council where shopfronts are installed that do not comply with the policies in the Local Plan and the Shopfronts SPD. Note also Policy 55. Delivery and Monitoring at part F refers to the Council's Planning Enforcement Policy.
861	Theresa Oddelm, The Royal Parks	Policy 28 Local Character and Design Quality	The scale and nature of Richmond and Bushy Parks is such that they are considered to be a significant influence on the local character. It is important that development does not threaten their character. As an important component of the Borough's character, the inclusion of the Parks' importance, and reference to their protection, should be included within this Policy.	Policy 28 provides guidance regarding the architectural and design quality within new developments, based on the characterisation work undertaken as part of the Urban Design Study 2021. The wider open space network, of which the Royal Parks form part, is referred to in Reg 18 paragraph 20.11 of the supporting text. The following amendment is suggested for clarity: <i>Particular attention needs to be given to the interface between the public and private space and how an area development will connect or relate to the wider open space network.</i> Policy 35 (Green Belt, Metropolitan Open Land and Local Green Space) refers to the need to take into account the impacts of developments on the character, local distinctiveness, and openness of the MOL, which along with Policy 34 and relevant references in the place-based strategies are considered to adequately address the Royal Parks across the Plan as a whole.
862	Vicky Phillips, Habitats & Heritage	Policy 28. Local character and design quality (Strategic Policy)	paras 20.17 and 20.18 – we strongly support the need to ensure that lighting is appropriate and does not have a detrimental impact on biodiversity and protected species. This is an area where the Council needs to keep up with current research which is showing that some lighting previously considered non-detrimental is having a detrimental impact.	Comment noted. Refer to Council's responses under policy 39 (Biodiversity and Geodiversity) and policy 43 (Floodlighting and other external artificial lighting) with references added to the Plan in relation to the importance of dark environments and relevant guidance published by the Institution of Lighting Engineers.
863	Martin Ellis, South West London Clinical Commissioning Group (CCG)	Policy 28. Local character and design quality and Policy 44. Design Process	We support the policy. The National Design Guide sets out ten characteristics of well-designed places, including movement, nature, safe and socially inclusive public spaces, mixed and integrated uses and healthy and sustainable homes and buildings, all of which contribute towards health and wellbeing. We suggest that the Council's public health team in involved in the local design coding process. There are numerous national accreditations and standards which already seek to improve design, such as Building for a Healthy Life and BREEAM. NHS England published Healthy New Towns 'Putting Health into Place' in September 2019 which provides advice on designing healthy places. When setting out requirements relating to health and care facilities, there is a need to include a specific reference to DHSC's Health Building Notes which provide guidance on the design and planning of new healthcare buildings and their immediate environment.	To ensure appropriate requirements are met in new development, add reference in the supporting text to Policy 49. which expects all new social and community infrastructure to be high quality: There may be relevant standards for new social and community infrastructure covering regulatory aspects for the specific type of provision, for example for health and care facilities the Department for Health and Social Care (DHSC)'s Health Building Notes provide guidance on the design and planning of new healthcare buildings and their immediate environment.
-	Martin Ellis, South West London Clinical Commissioning Group (CCG)	Housing quality	[See comment 1096 on housing design, and health and wellbeing]	Noted.
864	Tim Catchpole, Mortlake with East Sheen Society	Policy 28. Local character and design quality (Strategic Policy)	We note the addition of nine new principles such as the promotion of energy efficiency, urban greening, etc. However, we also note that one phrase in LP1 seems to have disappeared, vis: "gated developments will not be permitted" – admittedly in brackets. We wonder why? Is it because this has been proved to be unrealistic?	This reference has not been removed, and it still included within the proposed policy. While it is numbered '5' in LP5, the amended text is under number '10' in Policy 28.
865	Peter Willan, Paul Velluet and Laurence Bain on behalf of	Policy 28. Local character and design quality (Strategic Policy)	The wording of Part A of the Policy needs to be amended to refer to the Borough's conservation areas as well as to the 'character areas' and 'places' identified in the Borough-wide characterisation work undertaken as part of Arup's Urban Design Study given	The purpose of Policy 28 is to encompass all development within the Borough, with special attention paid to the 'places' and 'character areas' identified in the

	Prospect of Richmond (and supported by the Friends of Richmond Green)		the statutory protection enjoyed by such designated heritage assets under the provisions of the Planning (Listed Buildings and Conservation Areas) Act, 1990, and the National Planning Policy Framework . The wording needs to be further amended to define 'the places' identified in Arup's Urban Design Study, and the purpose of such a designation.	Urban Design Study. Conservation Areas are included in this umbrella policy/by default but have more specific expectations outside of the scope of this policy, which are outlined in Policy 29 – Designated Heritage Assets. The purpose of the Urban Design Study is outlined in detail in Policy 2 (Spatial Strategy: Managing change in the borough) and in sections 5 and 6 of the Local Plan. See also response to comment 586.
866	Peter Willan and Paul Velluet, Old Deer Park Working Group	Policy 28. Local character and design quality (Strategic Policy)	The wording of Part A of the Policy needs to be amended to refer to the Borough's conservation areas as well as to the 'character areas' and 'places' identified in the Borough-wide characterisation work undertaken as part of Arup's Urban Design Study given the statutory protection enjoyed by such designated heritage assets under the provisions of the Planning (Listed Buildings and Conservation Areas) Act, 1990, and the National Planning Policy Framework . The wording needs to be further amended to define 'the places' identified in Arup's Urban Design Study, and the purpose of such a designation.	See response to comment 865.
867	Nick Alston, Avison Young on behalf of St George Plc and Marks & Spencer	Policy 28 Local Character and Design Quality	Recommended Amendments and Explanation Policy 28 supports the introduction of high-quality architecture and urban design. Whilst the drafting of the policy is generally supported, Part B of the policy is unsound. We recommend the following amendment to Part B to make the policy sound: 'To ensure development respects, contributes to and (where appropriate) enhances the local environment and character, proposals must reflect and demonstrate the following principles'.	Suggested to include: contributes to and maximise opportunities to enhance in the absence of a statutory duty to enhance.
868	Unity Harvey	Page 228 Advertisements and hoardings, Paragraph 20.22	Please could you ensure that banners are still included in the list of banned advertisements especially on Metropolitan Open Land including on Sports Centres and Playing Fields . Individual coaches and clubs would like their own banners...	Individual types of advertising are not 'banned' and there are instances where some advertisements do not need formal consent. Where possible, the Council will use Policy 28 to ensure advertisements do not have an adverse effect upon views from or within open spaces and to remove advertisements that cause demonstrable harm to amenity.
869	Jon Burrell	Policy 28 Local Character and Design Quality, Paragraph 20.23	Digital advertising displays are energy wasteful and serve minimal public utility. Policies should be developed that ensure energy utilisation is minimised e.g. displays are static and require no additional lighting or energy supply. Polices should not just be about the visual appearance. Changes considered necessary and supporting evidence: http://adblockbristol.org.uk/2019/11/the-electricity-cost-of-digital-adverts/ https://e360.yale.edu/digest/digital-billboards-consume-large-amounts-of-energy-analysis-shows https://movia.media/moving-billboard-blog/are-digital-billboards-bad-for-the-environment-1/	Comment noted and supporting text amended in Reg 18 paragraph 20.22 as follows: 5. Proposals are encouraged to maximise energy efficiency in digital advertising displays. There are opportunities where planning permission is required for sustainability to be considered such as through use of renewable energy and LEDs, and take a broader consideration of the impacts and benefits of any signage proposed.
870	Matt Scales, Metropolitan Police Service - Designing Out Crime	Policy 28. Local character and design quality, B11 and B12	Thank you for providing the Metropolitan Police Service (MPS) with the opportunity to comment on the Richmond Draft Local Plan. This response is following on from a consultee letter sent to us on the 12th April 2022. This response is solely referencing Crime Prevention and Designing out Crime, through our delivery of the National Police Service Secured by Design scheme. You may receive responses from other areas of our organisation, where the draft plan interacts with that particular area of business. We have some specific observations on sections of the draft plan and also some further observations in relation to the Secured by Design scheme. We hope you find our comments useful. However, if you have any issues or queries please don't hesitate to contact us. The Secured by Design scheme has proven results in reducing crime and the fear of crime, with up to 87% reduction in Burglary and 25% reduction in criminal damage on new build projects, and 61% in major refurbishment projects (2009). The scheme is also successful at reducing anti-social behaviour, through a raft of measures including robust communal door standards, access control and careful design / layout of new homes. The Secured by Design scheme can deliver safe and sustainable homes and businesses through a range of techniques in crime prevention, including utilising independently tested products proven to resist attack and misuse. Policy 28 - Local Character and Design B11 The MPS is supportive of reference B11 which states "Minimise opportunities for crime and antisocial behaviour, based on an understanding of the locality and site-specific circumstances, utilising principles of natural surveillance and orientation of buildings as well as uses." We would like to encourage early consultation with Metropolitan Police Designing-Out Crime Officers (DOCO's) to be considered as well as following the Secured by Design (SBD) Guides for New Homes/Schools/Commercial as applicable. To this end we would appreciate an additional point to be added into section B of Policy 28 which would read as written below: Policy 28 – Local Character and Design B12 'The Council will consult the Metropolitan Police on all applications involving major development, significant community interest or those deemed appropriate by the Local Planning Authority. In certain circumstances, achieving Secured by Design certification may be required as a condition of planning consent. Applicants should consult with the Metropolitan Police designing out crime officers at the earliest opportunity and include details of security and secured by design compliance on the Design and Access statement.' Additionally the MPS and the Secured by Design scheme can play a huge role in a safe environment, health and wellbeing. Research has consistently shown that crime, the fear of crime and health are related (<i>Crossman & Rader, 2011; McKee & Milner, 2000; Stiles et al., 2003; Whitley & Prince, 2005</i>).	New reference in part B.11 and additional paragraph on Secured by Design in supporting text. Note it is not considered necessary in the Plan to reference who will be consulted on planning applications, as that process is outside of the remit of the Local Plan. Also note response to comment 1090, as a broader reference to the community safety agenda has been added in the supporting text to Policy 51. Health and Wellbeing, which recognises that the layout of development and public realm, encouraging active and continual use of spaces, can reduce opportunities for crime and anti-social behaviour and the fear of crime.

			<p>Due consideration should be paid to the Council's duty under Section 17 of the Crime and Disorder Act 1998 to consider crime and disorder implications in excising its planning functions; to promote the well-being of the area in pursuance of the Council's powers under section 2 of the Local Government Act 2000 and to ensure the development provides a safe and secure environment in accordance with the London Plan 2021 in Section B of policy D11.</p> <p><i>We would further like to draw reference to the new London Plan;</i></p> <p>London Plan Policy D11: Safety, Security and Resilience to Emergency</p> <p>Paragraph 3.11.3</p> <p>Measures to design out crime, including counter terrorism measures, should be integral to development proposals and considered early in the design process, taking into account the principles contained in guidance such as the Secured by Design Scheme published by the Police.... This will ensure development proposals provide adequate protection, do not compromise good design, do not shift vulnerabilities elsewhere, and are cost-effective. Development proposals should incorporate measures that are proportionate to the threat of the risk of an attack and the likely consequences of one.</p> <p>Paragraph 3.11.4</p> <p>The Metropolitan Police (Designing-Out Crime Officers and Counter Terrorism Security Advisors) should be consulted to ensure major developments contain appropriate design solutions, which mitigate the potential level of risk whilst ensuring the quality of places is maximised.</p> <p><i>I would finally like to reference one final section of the London Plan when considering our comments above.</i></p> <p>London Plan: Policy D11: Section B:</p> <p>Boroughs should work with their local Metropolitan Police Service 'Design Out Crime' officers and planning teams, whilst also working with other agencies such as the London Fire Commissioner, the City of London Police and the British Transport Police to identify the community safety needs, policies and sites required for their area to support provision of necessary infrastructure to maintain a safe and secure environment and reduce the fear of crime. Policies and any site allocations, where locally justified, should be set out in Development Plans.</p> <p>Thank you again for the opportunity to comment on this plan. The MPS Designing Out Crime Team strive to ensure that new developments across London reach the highest possible security standards, mainly through partnership working with the relevant Planning Departments and requesting conditions to comply with Secured by Design. By including a requirement in your core planning strategy that major new schemes will require Secured by Design accreditation, after proper consultation with Designing out Crime Officers, we are better placed to deliver secure developments across the London Borough of Richmond Upon Thames.</p>	
-		Policy 29. Designated heritage assets		
871	Theresa Oddelm, The Royal Parks	Policy 29 Designated Heritage Assets	We welcome the Council's approach to heritage assets, especially with regard to the protection and enhancement of the Borough's Historic Parks and Gardens.	Comment noted.
872	Alice Shackleton, on behalf of The Kew Society	Policy 29 Designated Heritage Assets and Policy 30 Non designated Heritage Assets	With regard to section 8 of Policy 29 (Protect and enhance the borough's registered Historic Parks and Gardens) see our comment under 8 [in relation to the place-based strategies] above in relation to heritage assets. 29 - A & C and 20/29/2 and 30 A : we would remove the words "where possible" in the context of taking opportunities to improve and "where possible" to enhance: if it is not possible then the words are not needed but if the words are included would they not offer scope for developer to argue the case? It almost suggests this.	See also response to 191. Paragraph 190 of the NPPF identifies that local plans set out a positive strategy for conservation of the historic environment and that this strategy should take account of the desirability of new development making a positive contribution to local character and distinctiveness. The NPPG elaborates this, identifying that LPAs should, where appropriate, seek delivery of development that will make a positive contribution to or better reveal the significance of a heritage asset. This draws on the statutory duty contained in the Planning (Listed Buildings and Conservation Areas) Act 1990 relating to conservation areas where there is a desirability to conserve or enhance. The text, specifically the inclusion of the wording 'where possible' therefore accords with the NPPF in terms of the desirability to enhance.
873	Katie Parsons, Historic England	Policy 29: Designated Heritage Assets	<p>We recommend some amendments to wording of part A. 2. As written the policy equates substantial harm with the total loss, i.e. demolition, of an asset rather than dealing with significance. NPPF paragraph 200 states that</p> <p><i>Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of: a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional; b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.</i></p> <p>The NPPF is clear that substantial harm can occur without demolition or total loss of the asset. The policy as written implies that only demolition will be substantial harm which is not the case. Furthermore, when considering substantial harm, the term resist is a weaker test that is unlikely to be effective given that such harm should be either exceptional or wholly exceptional (depending on the grade of asset), and that NPPF 201 goes on to tell us that where a proposed development will lead to substantial harm or total loss of significance consent should be refused (stronger than resisted). Ideally local plans ought not to duplicate the tests set out in the NPPF, however if you do wish include a policy criterion along these lines, we advise that this policy is amended to better reflect the tests set out in the NPPF. If, however the intention of part A.2. is not to deal with substantial harm but to instead provide a policy provision to maximise embodied carbon through the retention rather than demolition of buildings, then this could be drawn out as a separate issue. A policy criterion covering just the importance of reusing and repurposing heritage assets would be a simpler more effective way of achieving this policy objective. In either</p>	<p>Replace part A.2 of policy with following:</p> <p><u>Total loss of or substantial harm to listed building should be wholly exceptional and will therefore be refused unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss in line with national policy requirements.</u></p> <p>Include following text on embodied carbon in paragraph 20.32 of supporting text:</p> <p><u>Careful and sensitive maintenance, management and reuse of heritage assets also saves embodied carbon and avoids the carbon dioxide of constructing new buildings.</u></p> <p>Amend part F of policy to include reference to avoiding maladaptation.</p>

			<p>situation this policy criterion should be amended and split into two to cover two differing issues 1) substantial harm, 2) demolition, reuse, and embodied carbon.</p> <p>At part F it would be helpful to reference the risks posed by maladaptation, for instance: <i>Sympathetic measures to make energy and carbon savings in historic and listed buildings are encouraged, by adopting a 'whole house approach' and understanding all the factors that affect energy use to avoid maladaptation. Any potential damages to the structure or heritage value, or impacting the setting of, historic buildings have to be avoided.</i></p>	
874	Louise Fluker, The Richmond Society	Policy 29. Designated heritage assets and Policy 30. Non-designated heritage assets	nothing is said about issuing enforcement notices where owners have left listed buildings or buildings of townscape merit to decay!	The issuing of enforcement notices falls outside of the planning policy process and relates to the legal powers contained within the Planning (Listed Buildings and Conservation Areas) Act 1990. Each enforcement situation will be carefully considered on a case-by-case basis, separate to the planning process.
875	Melanie Gurney, The Planning Lab, on behalf of the Royal Botanic Gardens	Policy 29	<p>Policy 29 (Designated heritage assets) is generally supported as it largely reflects policy contained within the NPPF. However, Part A(3) resists the change of use of listed buildings where their significance would be harmed, particularly where the current use contributes to the character of the surrounding area and to its sense of place. The change of use of a building is not generally controlled by the listed building consent process; rather it is a matter of whether the change constitutes development (or is 'permitted development'), under the Town and Country Planning Act. Further, the change of use of heritage assets can be a positive thing to help bring them back into a functioning, viable use that is consistent with their conservation; and in turn helps to secure investment in their upkeep to preserve them for years to come. The PPG also acknowledges that the 'optimum viable use' is not necessarily the original use. While harm to significance should always be generally avoided, changing the use of a historic asset is sometimes necessary to secure other heritage and public benefits and this might be better reflected in the policy. It is RBGK's intention to improve the energy efficiency and sustainability of some of its listed buildings in the forthcoming years and RBGK look forward to working with the Council to achieve this, but RBGK welcome the recognition in the draft plan that there is a balance to be achieved between securing energy and carbon savings in historic buildings whilst protecting their architectural and historic significance. RBGK also suggest that acknowledgement of this is provided within the main energy and sustainability policies (i.e. policies 3-7).</p> <p>Of note, Part F of Policy 29 recognises that, whilst energy and carbon savings in historic and listed buildings are supported, there are limitations given the heritage value of these buildings and the need to protect sensitive fabric. The supporting text of this policy acknowledges that each proposal will be assessed on a case-by-case basis. RBGK support this approach that attempts to deal with the complex but important balance between environmental / sustainability measures and harm to a heritage asset. RBGK would encourage a focus on accommodating building efficiencies, where other potentially intrusive options could cause greater harm to significance.</p> <p>We would also highlight that there looks to be a reference error in the supporting text at paragraph 20.27, which refers to the RBGK WHS policy as Policy 29, rather than Policy 32 of the plan.</p>	<p>Reword policy part A.3 as follows:</p> <p>Resist the change of use of listed buildings where their significance would be harmed, particularly where the current use contributes to the character of the surrounding area and to its sense of place, <u>unless it secures the optimum viable use and/or there are public benefits to outweigh the harm.</u></p> <p>Noted regarding the reference error, this will be updated accordingly.</p>
876	Tim Catchpole, Mortlake with East Sheen Society	Policy 29. Designated heritage assets	We note that your Section B duplicates Section A.9. One of these has to be deleted.	Delete duplication in B and re-instate text: <u>Resist substantial demolition in Conservation Areas and any changes that could harm heritage assets, unless it can be demonstrated that:</u>
877	Katy Wiseman, National Trust	Policy 29. Designated heritage assets	<p>The Trust supports proposed Policy 29 Designated heritage assets which requires developments to conserve, and where possible, take opportunities to make positive contributions to, the historic environment of the borough. We support wording within this policy which requires developers to also have regard to the 'setting' of heritage assets when considering the significance of the borough's designated heritage assets, whilst we support paragraph 20.29 within the draft Local Plan, we feel this could be strengthened by linking with proposed Policy 31. Views and vistas.</p> <p>Climate change is the single biggest threat to the precious landscapes and historic houses that we care for. Rising temperatures are damaging some of the finest painting in our care with pests and diseases posing greater risks to our collections, tree and plants. We're tackling the causes of climate change by reducing emissions. We are adapting and changing the way we manage our assets and cutting our carbon emissions. We have an environmental pledge that by 2030 we'll be carbon net-zero across our own emissions and those created by our supply chain and investments. We are pleased that the draft Local Plan recognises that historic and listed buildings will also need to adapt and that sympathetic measures to make energy and carbon savings in historic and listed buildings are encouraged (criterion F) as this will allow us to adapt our significant historic buildings.</p> <p>Changes considered necessary: Whilst we support paragraph 20.29 within the draft Local Plan, we feel this could be strengthened by linking with proposed Policy 31. Views and vistas.</p>	<p>Noted regarding comments to better link to policy 31. Views and Vistas. Point 2 of paragraph 20.29 could be updated to read: Demonstrate how the development protects, and where possible enhances, the setting, including views, gaps and vistas and any other features, as identified in the relevant Conservation Area Statement/Study <u>and the Views and Vistas identified in the Policies Map</u>, or in relation to a listed buildings, Scheduled Ancient Monument or Historic Park or Garden</p>
878	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	Policy 29. Designated heritage assets	No change proposed.	Comment noted.
879	Peter Willan and Paul Velluet, Old Deer Park Working Group	Policy 29. Designated heritage assets	No change proposed.	Comment noted.

<p>880</p>	<p>Nick Alston, Avison Young on behalf of St George Plc and Marks & Spencer</p>	<p>Policy 29 Designated Heritage Assets</p>	<p>Recommended Amendments (tracked changes to Reg.18 draft text)</p> <p>A. The Council will require development to conserve and, where possible, take opportunities to make a positive contribution to, the historic environment of the borough. Development proposals likely to <u>cause harm to a designated heritage asset would require clear and convincing justification and should be weighed against the public benefits of the proposal, adversely affect the significance of heritage assets will be assessed against the requirement to seek to avoid harm and the justification for the proposal.</u> The significance (including the settings) of the borough's designated heritage assets, encompassing Conservation Areas, listed buildings, Scheduled Monuments as well as the Registered Historic Parks and Gardens, will be conserved and enhanced by the following means:</p> <ol style="list-style-type: none"> 1. Give great weight to the conservation of the heritage asset when considering the impact of a proposed development on the significance of the asset. 2. Resist the demolition in whole, or in part, of listed building. Consent for demolition of Grade II listed buildings will only be granted in exceptional circumstances and for Grade II* and Grade I listed buildings in wholly exceptional circumstances following a thorough assessment of the justification for the proposal and the significance of the asset. Careful and sensitive maintenance, management and reuse of heritage assets also saves embodied carbon and avoids the carbon dioxide of constructing new buildings. 3. Resist the change of use of listed buildings where their significance would be harmed, particularly where the current use contributes to the character of the surrounding area and to its sense of place. 4. Require the retention and preservation of the original structure, layout, architectural features, materials as well as later features of interest within listed buildings, and resist the removal or modification of features that are both internally and externally of architectural importance or that contribute to the significance of the asset. 5. Demolitions (in whole or in part), alterations, extensions and any other modifications to listed buildings should be based on proportionate<u>an accurate</u> understanding of the significance of the heritage asset. 6. Require, where appropriate, the reinstatement of internal and external features of special architectural or historic significance within listed buildings, and the removal of internal and external features that harm the significance of the asset, commensurate with the extent of proposed development. 7. Require the use of appropriate materials and techniques and strongly encourage any works or repairs to a designated heritage asset to be carried out in a correct, scholarly manner by appropriate specialists. 8. Proposals that affect the borough's Registered Parks and Gardens should conserve their significance. Where proposals may cause harm to that significance, that harm should require clear and convincing justification and be outweighed by public benefits.<u>Protect and enhance the borough's registered Historic Parks and Gardens by ensuring that proposals do not have an adverse effect on their significance, including their setting and/or views to and from the registered landscape.</u> 9. Proposals that affect the borough's Scheduled Ancient Monuments should conserve their significance. Where proposals may cause harm to that significance, that harm should require clear and convincing justification and be outweighed by public benefits.<u>Protect Scheduled Monuments by ensuring proposals do not have an adverse impact on their significance.</u> <p>B. Protect Scheduled Monuments by ensuring proposals do not have an adverse impact on their significance.</p> <ol style="list-style-type: none"> 1. in the case of substantial harm or loss to the significance of the heritage asset, it is necessary to achieve substantial public benefits that outweigh that harm or loss; 2. in the case of less than substantial harm to the significance of the heritage asset, that the public benefits, including securing the optimum viable use, outweigh that harm; or 3. the building or part of the building or structure makes no positive contribution to the character or distinctiveness of the area. <p>C. All proposals in Conservation Areas are required to preserve and, where possible, enhance the character or the appearance of the Conservation Area.</p> <p>D. Where there is evidence of intentional damage or deliberate neglect to a designated heritage asset, its current condition will not be taken into account in the decision-making process.</p> <p>E. Outline planning applications will not be accepted in Conservation Areas.The Council's Conservation Area Statements, and where available Conservation Area Studies, and/or Management Plans, will be used as a basis for assessing development proposals within, or where it would affect the setting of, Conservation Areas, together with other policy guidance, such as Village Planning Guidance SPDs.</p> <p>F. Sympathetic measures to make energy and carbon savings in historic and listed buildings are encouraged, by adopting a 'whole house approach' and understanding all the factors that affect energy use. Any potential damages to the structure or heritage value, or impacting the setting of, historic buildings have to be avoided.</p> <p>Explanation/Justification</p>	<p>Comments are noted regarding suggested changes.</p> <p>The suggested change to part A seeks to reflect the wording of the NPPF, however local policies should instead draw on local requirements. The need to avoid harm and then justify the proposal is the process that needs to be undertaken before the harm is balanced against the public benefits. The balance is clearly set out in the NPPF and does not need to be repeated in the policy, but the policy sets out what needs to be undertaken before the balancing exercise along with assessing against the local criteria in point 2 – 9.</p> <p>Part A.2 of the policy has been re-worded in response to comments from Historic England (see response 873)</p> <p>Part A.4 wording replaced as follows: <u>Resist the removal or modification of features such as original structure, layout, architectural features, materials as well as later features that contribute to the significance of the listed buildings.</u></p> <p>Amended part A.5 as suggested.</p> <p>Part A.6 is considered sound to retain.</p> <p>Part A.8 is considered sound to retain.</p> <p>Part A.9 is considered sound to retain.</p> <p>Part E amended to state: Outline planning applications will not be accepted in Conservation Areas <u>unless it can be demonstrated that the impacts of the development on the significance of the area can be fully assessed including views and vistas.</u></p>
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			We consider the drafting of Policy 29 to be unsound. Paragraphs 201 & 202 of the NPPF (2021) state that where a proposed development will cause harm to a designated heritage asset (whether that be substantial or less-than-substantial), clear and convincing justification is required in order to demonstrate that such harm is outweighed by the public benefits of a development proposal. As currently drafted, Policy 28 is not compliant with national planning policy. 3.5 Parts A.4, A.6 A.8 and A.9 are considered too specific, particularly in reference to the requirement to retain and preserve original structures, layouts and architectural features. There is no requirement to, in national planning policy or the London Plan 2021, to reinstate historic features, not least in cases of buildings of multiple periods, as it may not be appropriate to reinstate features of a particular phase of a building's history.	
-		Policy 30. Non-designated heritage assets		
881	Gary Backler, Friends of the River Crane Environment (FORCE)	Policy 30. Non-designated heritage assets	We are disappointed that this policy makes no explicit reference to the preservation and enhancement of the borough's historic industrial sites and watercourses. These include for example the formerly industrial landscape of Crane Park with its water power, Little Park and the historic water features in the grounds of Kneller Hall. The whole of the Crane corridor is an area of archaeological importance, and it should be protected and promoted as a heritage and educational asset at least as rigorously as other assets identified in (20.37).	Reference to industrial sites and water courses included in paragraph 20.37 which recognises the range of non-designated features in the borough's historic environment deemed worthy of protection.
882	Louise Fluker, The Richmond Society	Policy 29. Designated heritage assets and Policy 30. Non-designated heritage assets	nothing is said about issuing enforcement notices where owners have left listed buildings or buildings of townscape merit to decay!	The issuing of enforcement notices falls outside of the planning policy process and relates to the legal powers contained within the Planning (Listed Buildings and Conservation Areas) Act 1990. Each enforcement situation will be carefully considered on a case-by-case basis, separate to the planning process.
883	Tim Catchpole, Mortlake with East Sheen Society	Policy 30. Non-designated heritage assets	We note the inclusion of Buildings of Townscape Merit... and other local historic features. We are pleased that our historic walls dating from the 18th and 19th centuries have recently been designated as BTMs but there are numerous other walls not included and we hope that they will come to be recognised as 'other historic features.' We also note that the applicants' requirements have been removed from the policy statement and been transferred to the supporting text. This is logical.	Comment noted. The policy includes examples of local historic features worthy of protection and this is not an exhaustive list. Designating Buildings of Townscape Merit is covered by a separate process which is outside the Local Plan. The Process for adding new BTMs was updated and agreed by the Environment, Sustainability, Culture and Sport Committee on 7th September 2021.
884	Nick Alston, Avison Young on behalf of St George Plc and Marks & Spencer	Policy 30 Non-designated Heritage Assets	Recommended Amendments (tracked changes to Reg.18 draft text) <div style="border: 1px solid black; padding: 5px; margin: 5px 0;"> <p><u>The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm of loss and the significance of the heritage asset.</u></p> <p><u>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.</u></p> <p><u>B. There will be a presumption against the demolition of Buildings of Townscape Merit.</u></p> </div> <p>Explanation/Justification 16.1 As currently drafted, Policy 30 is not consistent with national policy set out in NPPF (2021), which requires the effect of an application on the significance of a non-designated heritage asset to be taken into account in determining applications. There is no requirement in national legislation or policy to preserve or enhance the significance of non-designated heritage assets.</p>	The policy seeks to preserve, and 'where possible' enhance, the significance, character and setting of non-designated heritage assets and is therefore in accordance with the NPPF. No change is proposed to the policy.
885	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	Policy 30. Non-designated heritage assets	No change proposed.	Comment noted.
886	Peter Willan and Paul Velluet, Old Deer Park Working Group	Policy 30. Non-designated heritage assets	No change proposed.	Comment noted.
-		Policy 31. Views and vistas		
887	Theresa Oddelm, The Royal Parks	Policy 31 Views and Vistas	We particularly welcome this policy as it aims to protect the quality of identified views, vistas, gaps and skyline, all of which are important factors in the Royal Parks. We also note that King Henry VIII's mound is included as a protected view which we commend. We would like to work further with the Council to positively manage views from the Parks in the context of new development.	Support noted. The draft Local Views SPD was subject to consultation from 22 July to 5 September 2022; comments from The Royal Parks have been received and considered.
888	Katie Parsons, Historic England	Policy 31: Views and Vistas	This is a helpful policy with appropriate criteria for assessing development proposals, we particularly support the criteria to seek improvements to remedy existing harm. However, we request the wording is amended to state "avoid harm to" rather than "protect" or "respect" the quality of views and setting etc. This wording is less ambiguous for applicants and decision makers.	Support noted. Amend the policy wording specify that harm to the quality of views, vistas etc should be avoided.
889	Louise Fluker, The Richmond Society	Policy 31.Views and vistas	we support the Council's approach but would point out that the biggest threats are from applications for high rise buildings outside the borough so a robust response by the Council to such applications is essential	Support noted. The Local Plan cannot control development beyond the borough boundary; however the Council will respond to consultations on planning applications from neighbouring authorities and through the Duty to Cooperate to consider where relevant the impact of proposals on the borough.

890	Gary Backler, Friends of the River Crane Environment (FORCE)	Policy 31.Views and vistas	We support the Council’s policy of protecting existing views and vistas and encourage the Council to “explore opportunities to create attractive new views and vistas” with particular reference to the River Crane corridor. Within the Crane corridor, we trust that the requirements of this policy will always take precedence over those of Policy 45 on tall and mid-rise buildings.	Support noted. New views and vistas have been suggested in the draft Local Views SPD, subject to consultation from 22 July to 5 September 2022; comments from FORCE have been received and considered. Policy 45 contains requirements to respect and respond to the analysis of views and vistas in assessing the visual impacts of proposals for tall buildings; it is not considered a matter of precedence, as all relevant policies would need to be addressed if an application is brought forward.
891	Tim Catchpole, Mortlake with East Sheen Society	Policy 31.Views and vistas	No comment but we look forward to consultation on the additional views being identified.	Noted. The draft Local Views SPD was subject to consultation from 22 July to 5 September 2022; comments from the Mortlake with East Sheen Society have been received and considered.
892	Melanie Gurney, The Planning Lab, on behalf of the Royal Botanic Gardens	Policy 31	RBGK generally support Policy 31 (Views and vistas), which seeks to protect the quality of views and vistas. However, RBGK seek clarification as to how the views have been assessed - there is an evidence base, but it is not explicit as to how the views have been determined and allocated. In addition, RBGK is supportive of any proposal affecting a designated/identified view or vista having to submit computer-generated imagery and visual impact assessments as part of an application. This is particularly relevant for Kew Gardens, which is highly sensitive to the impacts of surrounding development. RBGK request that they are consulted as part of any future proposals that may affect the site. RBGK also wish to be kept informed of the forthcoming Views and Vistas SPD.	Support noted. The Council commissioned consultants (Arup) to carry out analysis on the borough’s views, alongside the Urban Design Study. Existing documents, such as Conservation Area Appraisals, were reviewed, and site visits carried out to recommend whether existing views were intact and whether there were any new views which merited designation. Further analysis was carried out in the draft Local Views SPD which sets out existing protected views, as well as newly identified locally important views. The draft Local Views SPD was subject to consultation from 22 July to 5 September 2022; comments on behalf of RBG Kew have been received and considered.
893	Katy Wiseman, National Trust	Policy 31. Views and vistas	The Trust supports proposed Policy 31 Views and vistas which seeks to protect the quality and identified views, vistas, gaps and the skyline which contribute significantly to the character, distinctiveness and quality of the borough. We support criterion A1. as it seeks to protect the quality of the views and vistas of designated/identified views and vistas, and we also support the requirement for proposals affecting designated views and vistas to be supported by computer-generated imagery as use of visualisation will help communicate to members of the public and other stakeholders the visual impacts of proposals. We wish to be kept informed and consulted on in the development of the future Views and Vistas SPD as having the opportunity to input into this supporting guidance will help us to protect our special places against adverse visual impacts.	Support noted. The draft Local Views SPD was subject to consultation from 22 July to 5 September 2022; the National Trust were informed of the consultation.
894	Nick Alston, Avison Young on behalf of St George Plc and Marks & Spencer	Policy 31 Views and Vistas	<p>Recommended Amendments (tracked changes to Reg.18 draft text)</p> <div style="border: 1px solid black; padding: 5px;"> <p>A. The Council will protect the quality of the identified views, vistas, gaps and the skyline, all of which contribute significantly to the character, distinctiveness and quality of the local and wider area, by the following means:</p> <ol style="list-style-type: none"> 1. protect the quality of the views and vistas as identified on the Policies Map, and for any proposal affecting a designated/identified view/vista on the Policies Map demonstrate this through the submission of such through computer-generated imagery (CGI) and visual impact assessments as required by Policy 44 Design process; 2. require clear and convincing justification for development which interrupts, disrupts or detracts from strategic and local vistas, views, gaps and the skyline; 3. require developments whose visual impacts extend beyond that of the immediate street to demonstrate how views are protected or enhanced, and reflect the relevant character area design guidance in the Urban Design Study; 4. require development to respect the setting of a landmark, taking care not to create intrusive elements in its foreground, middle ground or background; 5. where appropriate, seek improvements to views, vistas, gaps and the skyline, particularly where views or vistas have been obscured; 6. preserve, or where appropriate, enhance seek improvements to views within Conservation Areas, which: <ol style="list-style-type: none"> a. are identified in Conservation Area Statements and Studies and Village Plans; b. are within, into, and out of Conservation Areas; c. are affected by development on sites within the setting of, or adjacent to, Conservation Areas and listed buildings. </div> <p>Explanation/Justification We find Policy 31 unsound and too prescribed. Elements of the draft policy do not conform with the London Plan (2021), which states that development should not harm, and should seek to make a positive contribution to, the characteristics and compositions of Strategic Views and their landmark elements. We recommend the policy is redrafted in order to be brought in line with strategic planning policies of the London Plan (2021), specifically Policy HC4 – London View Management Framework.</p>	Comment 895 does not raise any conformity issue with the London Plan. See response to comment 888; the policy has been worded to reflect the comments from Historic England to specify that harm to the quality of views etc. should be avoided.
895	Nina Miles, GLA on behalf of Mayor of London	Policy 31. Views and vistas	We note that Richmond intends to identify its views and vistas on the Policies Map. Table 7.1 of the LP2021 identifies the King Henry VIII’s Mound to St Paul’s Cathedral linear view as a protected vista. The view should be managed by following the principles of Policy HC4 LP2021 and this should be noted in the supporting policy text. We welcome the recognition of the importance computer-generated imagery (CGI) and 3D modelling in Policy 31 and paragraph 20.44.	Noted. Add reference to Policy HC4 of the London Plan in the supporting text.
-		Policy 32. Royal Botanic Gardens, Kew World Heritage Site		

896	Tim Catchpole, Mortlake with East Sheen Society	Policy 32. Royal Botanic Gardens, Kew World Heritage Site	No comment.	Comment noted.
897	Katie Parsons, Historic England	Policy 32: Royal Botanic Gardens Kew	In part A we request that the wording is amended to make reference to Outstanding Universal Value, e.g. <i>The Council will protect, conserve, promote and where appropriate enhance the Royal Botanic Gardens, Kew World Heritage Site, its Outstanding Universal Value and attributes, its buffer zone and its wider setting.</i> The Operational Guidelines for the Implementation of the World Heritage Convention (2019) stress the importance of Heritage Impact Assessments, noting at paragraph 118 that these should be a pre-requisite for development projects and activities that are planned for implementation within or around a World Heritage property. We request that the policy includes an additional criterion requiring development within or around the WHS to provide an HIA upon application. ICOMOS has provided Guidance on Heritage Impact Assessments for Cultural World Heritage Properties (2011). It might also be helpful to explain how the Council will refer relevant applications to UNESCO within the justification text.	The Outstanding Universal Value of the site, its integrity, authenticity and significance is already covered separately under the second bullet point of the policy and isn't necessary to repeat in the first part of the policy. The requirement for a Heritage Impact Assessment within or around the World Heritage Site will be proportionate to the scale and location of the development being proposed and is considered on a case-by-case basis (for example it may not be applicable to certain householder applications within the buffer zone). It is explained in paragraph 20.49 that the Council will follow the ICOMOS Guidance on Heritage Impact Assessments for Cultural World Heritage Properties, which continues the approach in the existing policy LP 6. UNESCO involvement extends to designating World Heritage Sites (as was the case with The Royal Botanic Gardens, Kew in 2003). Following this, ongoing protection of the WHS takes place through partnership working between the borough, Historic England and surrounding boroughs (amongst others). This sits outside the Local Plan but information is set out in paragraph 20.51 of the supporting text.
898	Melanie Gurney, The Planning Lab, on behalf of the Royal Botanic Gardens	Policy 32	RBGK note that Policy 32 (Royal Botanic Gardens, Kew World Heritage Site) contains the same wording as adopted Local Plan Policy LP 6 (Royal Botanic Gardens, World Heritage Site). RBGK support the need for a site-specific policy, but request that the Council recognise that the effective management of the WHS requires an appropriate balance between the needs of conservation, access, interests of our visitors and the local community, and sustainable economic use and operation of the site. RBGK will need to develop and adapt the site into the future to support the sustainable function and operation of the Gardens, while continuing to provide a world-renowned, leading visitor attraction and working scientific and research institution. RBGK will ensure that any development proposal is sensitively designed to respect, conserve and enhance the site and its Outstanding Universal Value, but requests that the Council applies some degree of flexibility and scope in this regard. Therefore, RBGK request that a fourth point is added under Part A as follows: "Ensuring the long-term sustainability of the World Heritage Site will require a careful balancing between the needs of conservation, access, biodiversity, the climate emergency, income and the public benefits of any development on the site." RBGK's regular temporary exhibitions and installations are run throughout the year, for which planning permissions are often required. This is an appropriate and necessary part of the functioning of Kew as an internationally significant visitor attraction; and can be key in enhancing the visitor and learning experience for our local and international visitors alike. These exhibitions also provide a way to draw attention to important issues and key elements of Kew's research, such as halting biodiversity loss. They draw visitors to the Borough, which provide other social and economic benefits. Given the related public benefits and frequency of the events and exhibitions, RBGK request that the following wording to be added as a fifth point under Part A: "Temporary events and exhibitions are recognised as a key part of the offer at the Royal Botanic Gardens, Kew World Heritage Site and, subject to other planning policy considerations within this plan, are supported in principle". Regarding the third point of Policy 32, RBGK request that the relevant year is added for the Kew World Heritage Site Management Plan reference (2020-2025). RBGK also request that the reference to the "Kew Landscape Master Plan" is removed as this is dated and does not reflect Kew's latest thinking.	Support for site-specific policy noted. Council considers most appropriate approach to considering exceptions to the policy (including on temporary events and exhibitions) continues to be on a case-by-case basis. As such no change to the wording of the policy is suggested. Policy amended to refer to the 'current' Kew World Heritage Site Management Plan to allow for future updates. Removed reference to Kew Landscape Masterplan. See also Policy 26: Visitor economy
899	Nina Miles, GLA on behalf of Mayor of London	Policy 32. Royal Botanic Gardens, Kew World Heritage Site	We welcome Policy 32 which recognises the Royal Botanical Gardens Kew as a World Heritage Site (WHS), in line with HC2 LP2021. A requirement for development proposals with the potential to affect the WHS or its setting to be supported by Heritage Impact Assessments should be within the Policy rather than supporting text.	This is considered adequately covered in paragraph 20.49 of the supporting text. The requirement for a Heritage Impact Assessment is considered on a case-by-case basis, proportionate to the type of development being proposed and the location, taking into account the ICOMOS guidelines and London Plan and Mayor of London's SPG on London's World Heritage Sites.
-		Policy 33. Archaeology		
900	Tim Catchpole, Mortlake with East Sheen Society	Policy 33. Archaeology	No comment but we insist there is sufficient time allowed for the necessary archaeological field investigations on the Brewery site.	Note that there is no comment on the draft policy. The response is in relation to a specific planning application for the Stag Brewery and will be addressed as part of the assessment of that planning application. The policy requires information to be submitted with a planning application to understand any heritage asset that might be affected, and enables further fieldwork and any necessary mitigation and reporting through informatives and conditions.
-		Increasing biodiversity and the quality of our green and blue spaces, and greening the borough		
901	Clare Snowdon	21 Increasing biodiversity and the quality of our green and blue spaces, and greening the borough	21 Biodiversity plan looks great. It would be really good to see inclusion of support for Nature-Connected Neighbourhoods, including urban hedgerows, swift tiles, hedgehog highways and wildlife gardening as well as equitable access to green and blue spaces. It would be great if the council could adopt the Wildbelt strategy as recommended by the Wildlife Trusts https://www.wildlifetrusts.org/sites/default/files/2020-09/Wildbelt%20briefing%20September%202020.pdf	These comments are noted. The Local Plan includes in Policy 34. Green and Blue Infrastructure a strategy to protect the green and blue infrastructure network, including how green and blue spaces should be incorporated into developments, how these spaces should be managed on behalf of developments and ensuring that accessibility is prioritised. Policy 15. Infill and Backland Development also


				<p>highlights how important non-designated backgardens are to the green infrastructure network and that these spaces will not be suffer from significant loss. Furthermore, both the adopted version and the draft version of the Council's Local Plan manage and protect a hierarchy of open spaces of different sizes and functions, and improvements are sought in areas of deficiency for open space or biodiversity.</p> <p>The 'wildbelt' strategy that has been put forward by the Wildlife Trusts is required to be delivered via the Nature Recovery Network (NRN) mechanism that was launched through the 2021 Environment Act. As of April 2023, local authorities are waiting for regulations and guidance to be laid out in Parliament before NRNs can be proceeded with. In the meantime, the Council have adopted the Biodiversity Action Plan which sets out Habitat Action Plans and Species Actions Plans for those habitats and species located in the borough.</p>
902	Hilary Pereira, River Thames Society	General comments - blue/green spaces (e.g. page 241), Policy 47. Sustainable travel choices	<p>The River Thames Society (RTS) welcomes the opportunity to comment on this local plan. The Borough of Richmond is very important to the river, being the only London Borough with territory over both banks. Richmond's Thames includes water that is fully tidal up to Richmond, half-tidal between Richmond and Teddington, and then non-tidal further upstream. As such, it helps demonstrate the diversity of the Thames which is celebrated by the RTS.</p> <p>Richmond is one of the most privileged parts of the country but that should not mean exclusive. The RTS shares the sentiment in the plan that Richmond needs to encourage wide enjoyment of the blue/green spaces it contains, and for which the Thames and its banks are so important. The RTS endorses the vision and strategic objectives in the plan in relation to protecting and improving the unique environment of the River Thames as wildlife corridors, as opportunities for recreation and river transport, increasing access to and alongside the rivers, gaining wider local community benefits and habitat improvements when sites are redeveloped. This means protecting river-related vistas and restraining any development which risks overpowering what makes the river environment so special</p> <p>The RTS is an active supporter of the Thames Landscape Strategy and is encouraged by Richmond Council's commitment to continued partnership working (eg p241).</p>	The support in these comments is noted.
903	Alice Roberts, CPRE London	General Comment (in relation to strategic approach to green space)	<p>CPRE London is a membership based charity with 2500 members across London, concerned with the preservation and enhancement of London's vital green spaces, as well as the improvement of London's environment for the health and wellbeing of all Londoners.</p> <p>We welcome the Council's commitments to:</p> <ul style="list-style-type: none"> • Protect and retain the borough's Green Belt and Metropolitan Open Land and improve and enhance its openness, character and use. • Make no changes to the Green Belt boundaries. • Protect Local Green Space from inappropriate development that could cause harm to its qualities. • Designate six new sites as Local Green Space <p>However, we have the following concerns: [See comment 270 in relation to the 20 minute neighbourhood concept and comment 258 in relation to opportunities to meet need, and other comments].</p>	See comments 270 and 258 respectively for the Council's response to these comments.
904	Heather Mathew, Richmond Council for Voluntary Service (CVS)	Page 18 (in relation to green and blue infrastructure)	<p>Pg 18 The VCS play a crucial role in protecting, maintaining, enhancing and educating about the green and blue infrastructure, tackling climate change and engaging people of all ages- Habitats and Heritage, Friends of Barnes Common, Friends of Crane Park, River Thames Boat Project etc. The plan should acknowledge the breadth of expertise and community engagement that such groups provide and encourage developers to work with groups to "provide formal and informal education to enable people to learn about and connect with nature and biodiversity "(Pg 19)</p>	The Council will amend the fifth bullet point under "Increasing biodiversity and the quality of our green and blue spaces, and greening the borough" to recognise local community groups by saying; "Require new major development to provide on-site green spaces with multi-functional benefits for biodiversity, climate change as well as health and wellbeing, including engaging with local community groups who are invested in the protection and enhancement of local green and blue assets and providing formal and informal education opportunities to enable people to learn about and connect with nature and biodiversity."
905	Jon Rowles	Policy 21 (in relation to wildlife sites)	<p>Does not go far enough to secure a meaningful network of interlinked wildlife sites for wildlife to be able to move about and ensure genetic diversity. Hasn't fully implemented the recommendations found in 'Making Space for Nature' by Sir John Newton. About twenty years all the railway lineside were recognised as important wildlife routes and then the following local plan deleted them all. Whilst I support the Whitton Linesides being added, I feel the whole route to Richmond Bridge should be added.</p>	The policies within our Local Plan seek to protect not just designated open space such as Metropolitan Open Land and SSSIs, but other non-designated assets through our green and blue infrastructure policy that contribute towards the mosaic of the borough's green and blue infrastructure network. Local authorities are awaiting further guidance and regulations regarding Nature Recovery Networks and how this will work in the London context. In the meantime, the Council has adopted it's Biodiversity Action Plan (2019) which sets out habitat and species action plans to protect the flora and fauna present in our borough.
-	George Goodby, Environment Agency	Sustainability Appraisal and Sequential Test Report	[See comment 224 on the Sustainability Appraisal in relation to climate change, flood risk, green and blue infrastructure]	-
-		Policy 34. Green and Blue Infrastructure (Strategic Policy)		
906	Tim Catchpole, Mortlake with East Sheen Society	Policy 34. Green and Blue Infrastructure (Strategic Policy)	We note this policy excludes the public open space hierarchy listed in LP12 and we wonder why?	The Council has removed the table titled 'Public Open Space Hierarchy' from part B, Policy 34 as such spaces already benefit from significant land use designations and/or protections such as Green Belt, MOL, OOLTI, LGS and it is not necessary to repeat the information in LP12 in policy going forward in the new Local Plan.

				Furthermore, the draft Local Plan includes a range of policies to protect land use designations and public open space.
907	Unity Harvey	Public Wellbeing - Dogs	Dog owners often allow their dogs in Queen Elizabeth Walk to run off the lead on to the Enable Sports Centre. They are a constant nuisance. Please can you ensure that the following policies are retained: - a. No Dogs permitted on the Wandsworth Sports Centre and Richmond Playing Field, b. <i>Dogs must be kept on a lead on public roads, pavements and footpaths.</i>	The issues raised in this comment are not of a planning nature and therefore cannot be dealt with through the Local Plan process.
908	Theresa Oddelm, The Royal Parks	Policy 34 Green and Blue Infrastructure	The Royal Parks form a large part of the green and blue infrastructure network within the Borough. We welcome the acknowledgement of recreational pressures and the impact of increased development on the Royal Parks within Richmond and therefore reference to working with The Royal Parks to ensure that careful management is achieved.	Comment noted.
909	Theresa Oddelm, The Royal Parks	Policy 34 Green and Blue Infrastructure—comments specific to biodiversity and the Royal Parks’ Environmental Designations	Recognition of the role of green infrastructure in reducing recreational impacts on sites such as Richmond Park is welcomed. This is included in the background text, but specific reference should also be made within the policy text given the significance of this impact on sites, including the Bushy Park SSSI and Richmond Park SAC, SSSI and NNR.	No change necessary. Policy 37, part B states that “the provision of new open spaces and actively encouraging new users and visitors to utilise these spaces will alleviate recreational pressures on sites designated for biodiversity”, therefore this issue has been accounted for in Local Plan policy.
910	Gary Backler, Friends of the River Crane Environment (FORCE)	Policy 34. Green and Blue Infrastructure (Strategic Policy)	We support the primacy which the Plan places on protecting and enhancing the borough’s Green Belt, Metropolitan Open Land and other open and designated spaces; and the “presumption against the loss of, or building on, greenfield sites.” (21.3) We support the recognition in the Plan of the importance of “smaller pieces of open land” (21.2) in providing continuous linkage of green spaces for biodiversity and recreation, and would particularly emphasise the significance of the River Crane valley in this respect, providing as it does a continuous green seam from Moor Mead Park to the western boundary of the borough, through areas of greater residential densification and income and health deprivation than in many parts of the borough. We agree that “residential development is likely to exacerbate...leisure and recreational pressure on existing green infrastructure” (21.3). We have already seen this in the additional pressures experienced at Craneford West Field and Kneller Gardens from successive residential developments at Twickenham Station, Brewery Wharf and Richmond College. We would ask the Council to be creative in avoiding the over-usage of existing green spaces, by for example removing paid-for sporting activities to sites which are better equipped to accommodate them (e.g. mini-rugby to the College Field); exploiting opportunities to link or improve access between existing spaces (e.g. Craneford West Field and the Challenge Court Meadow); and returning strategic brownfield sites to nature rather than immediately redeveloping them (Mereway Day Centre). The Council should indeed “reap[] all the benefits of having high quality, well maintained open spaces and green infrastructure” through its Section 106 negotiations with developers who exact premium prices for developments adjacent to green and blue infrastructure. We support the proposal that “Pedestrian and cycle routes through green spaces should be protected and, wherever possible, provided to a high standard in accordance with best practice guidance.” (21.5) However, it is important that these paths are maintained for dual pedestrian/cyclist usage and not rendered unsafe for pedestrians by aggressive cycling. It is also important that the “green space” characteristics are upheld when selecting the alignments and surfaces of these routes, and in particular that lighting is avoided in dark corridors. We support the recognition that “Green space areas also provide important storm water retention opportunities by minimising surface water run-off rates during severe rainfall storm events” (21.6). We would like the Plan explicitly to recognise the potential for attenuating flooding by naturalising the River Crane below the Mereway Weir, including past Twickenham Rifle Club and through Moor Mead Park. Naturalising the riverbanks and removing protective chainlink fencing would also improve the recreational value of the river for residents. Whilst we recognise the potential for trees to promote urban cooling and provide shade cover (21.6), the Plan should also recognise that inappropriate tree-planting can reduce biodiversity by blocking light which would enable other flora to flourish. We would also like the Plan to make a more explicit commitment to tackling invasive species, both in-river and along the riverbanks. We welcome the commitment to “encourage the creation of multi-functional green space wildlife or ecological corridors within new development site layouts” and the advocacy of SuDS (21.7). We also welcome recognition of the need for “long-term management and maintenance” and the commitment to management plans (21.9). We believe that dark corridors are essential for wildlife and that quiet spaces are important for both wildlife and people. We would like to see specific policies developed by the council to protect and enhance dark corridors and quiet spaces as part of this Plan.	In response to the point on over-usage of existing green spaces, the Council is preparing an Open Space Report that will act as the evidence base for open space policies in the draft Local Plan. This report will be published alongside the Regulation 19 consultation in 2023. In response to the point on dual pedestrian/cyclist usage, our adopted ‘Transport SPD’ states that the Council will follow the guidance set out in the London Cycling Design Standards. The Council does not have any ‘dark corridors’, however lighting is a material planning consideration and lighting’s impact on biodiversity will be considered, alongside other aspects such as safety. In response to the point on renaturalising the River Crane (and other rivers), this is something that the Council are keen to do where possible and one side of the River Crane has recently been deculverted. It is however a difficult process and requires additional land on the bank in order to achieve the necessary gradient required. Renaturalising the river in areas that are popular with the public and where access should be improved also presents challenges. In response to the point on inappropriate tree-planting, Policy 39 links to Richmond’s Biodiversity Action Plan which discusses the type of habitats within the borough of Richmond, noting specific factors affecting each habitat. Policy 42 of the draft Local Plan sets out the Council’s overall approach to tree-planting. The Local Plan is not responsible for the removal of invasive species, which instead is a commitment for organisations, most notably, DEFRA.
911	Michael Atkins, Port of London Authority (PLA)	Policy 34. Green and Blue Infrastructure (Strategic Policy)	Support reference to both blue and green infrastructure in the policy including the aim to enhance accessibility to open spaces as well as to the blue infrastructure network, particularly to the borough’s rivers and their banks, for leisure and recreational use.	Support noted.
912	Vicky Phillips, Habitats & Heritage	Policy 34. Green and Blue Infrastructure (Strategic Policy)	para 2. 3. It is essential to protect as well as enhance green corridors, including dark corridors which are used by bats and other species at night. Green corridors across the Borough which connect areas of open space of all types are not properly mapped at present making their protection difficult. The definition of “green corridor” is also not clear – a route used by wildlife to move from site to site e.g. via large trees in streets and private gardens, may not be a green corridor that humans can use. Policy 39 para 1 refers to “protecting ecological or wildlife corridors from development which may destroy, impair or harm the integrity of the corridor”. para 2.4 Protecting biodiversity only within the green and blue infrastructure network, if this is only designated open spaces as defined in para 2.1, will not ensure protection for many of the species most at risk and subject to action plans in the Richmond Biodiversity Action Plan, particularly bats, birds, hedgehogs, stage beetles etc. Policy 39 para 2 sets out a more comprehensive vision of “protecting and conserving priority species and habitats that sit outside the nature conservation network of designated sites and promoting opportunities for their enhancement”.	In response to the point on defining ‘green corridors’, agreed. We will amend the supporting text of paragraph 21.7 to read; “ Green corridors are linear natural infrastructure, containing trees and plants, that link to other typically larger green and open spaces to form a green infrastructure network. In order to make the borough more resilient to future climate change pressures and at the same time deliver measurable net gains for biodiversity (see Policy 39 on Biodiversity), the Council will encourage the creation of multi-functional green space wildlife or ecological corridors within new development site layouts...” In response to Policy 34, part 2.4, agreed. The Council will amend this section to read; “Protect and enhance biodiversity within the green and blue infrastructure networks, particularly on sites designated for nature conservation interest, but

			para 2.9 We applaud the introduction of a requirement to provide space for growing food in new developments. This is particularly needed in Richmond Borough as allotment waiting lists are so long. This needs to be part of the design of the landscaping of developments at an early stage.	also recognising the contribution that non-designated nature sites offer to increasing biodiversity in the borough. In response to the point on Policy 34, part 2.9, noted.
913	George Goodby, Environment Agency	Policy 34. Green and Blue Infrastructure (Strategic Policy)	We are pleased to see that the value of green and blue infrastructure is recognised and is included as a separate policy. In point 2.7, we feel the policy would be strengthened if 'biodiversity value is protected' is changed to 'biodiversity value is protected and enhanced in a measurable way'. This would also tie the policy in more closely to the net gain requirements outlined in Policy 39: Biodiversity and Geodiversity .	Agreed. The Council will amend Policy 39 to read; "Enhance accessibility to open spaces as well as to the blue infrastructure network, particularly to the borough's rivers and their banks, for leisure and recreational use, while ensuring that the biodiversity value is protected and enhanced in a measurable way."
914	Philip Briggs, Richmond Bat Species Action Plan Steering Group	p.242 21.7	"...the Council will encourage the creation of multi-functional green space wildlife or ecological corridors within new development site layouts..." We would like to see some wording about ensuring wildlife corridors are functional during the night as well as during the day. Unless completely unavoidable, wildlife corridors should have no spill from artificial lighting which has been shown to have detrimental effects on bats, including increased vulnerability to predators and disturbance of roosts and commuting and foraging areas (see https://cdn.bats.org.uk/uploads/pdf/Resources/ilp-guidance-note-8-bats-and-artificial-lighting-compressed.pdf?v=1542109349 - page 8). Richmond-upon-Thames is important for bats within the London context, thanks to large areas of green space which support at least ten species (see https://habitatsandheritage.org.uk/wp-content/uploads/2020/11/RBP-Bats.pdf-resize.pdf). A relative richness in biodiversity in the London context should be recognised as an important part of the borough's character and bats are a notable component of this (along with other species which have Richmond borough species action plans). However, the wide extent of artificial lighting in the borough causes fragmentation of bat habitat which can restrict bat movement between sites. To prevent this from worsening we need the introduction of new lighting to be kept to a minimum and opportunities taken to review the need for existing lighting in areas adjacent to important bat habitat with the aim of reducing or even removing the lighting as appropriate. See our final comment below for more details of key areas where we would like to see no new lighting and a review/reduction of existing lighting.	The Council will amend the supporting text of paragraph 21.4 to read; "With the decline of biodiversity across the globe, it is vitally important that new features do not only offer a 'green space' but provide value by forming part of a larger ecosystem, helping to maintain biodiversity. For example, green corridors can be safeguarded for biodiversity by carefully considering any physical infrastructure installed, such as reducing the extent of artificial lighting where possible to protect species of bat present in the borough (see Policy 39. Biodiversity and Geodiversity and Policy 42. Floodlighting and other external artificial lighting) Green and blue infrastructure play a significant role in both mitigating and adapting to climate change.
915	Philip Briggs, Richmond Bat Species Action Plan Steering Group	p.242 21.7	Please could the commitment stated in 12.7 be explicitly included in each of the larger specific site development plans. Examples where this is missing include: p.63 Site Allocation 10: St Mary's University. There should be a statement about the potential biodiversity value of the site and connectivity via the Thames to the extensive wildlife habitat of Ham Lands/Young Mariner's Club should be stated. p.132 Site Allocation 34: Stag Brewery, Lower Richmond Road, Mortlake. Development of this site should include greater provision for biodiversity, incorporating provision for roosting bats (to replace any bat roost potential that is lost), including a wildlife corridor between the river and Mortlake Green. The plan does mention green space and a link between the river and the green for people but please could we have a biodiversity commitment for this site?	This comment has been responded to within the corresponding site allocation policies. However, no changes are proposed to the Site Allocation policy wording as all planning applications are expected to have regard to relevant policies and officers feel it is more appropriate for a future applicant to set out how ecological enhancements would be achieved on site.
916	Joan Gibson	Page 240	enhancing our blue and green infrastructure. Many community groups and members want to enhance their local area bit face many barriers from LBRuT. A policy of encouraging community groups and council officers trained to work with them will really accelerate improvements across the borough and attract external funding.	Although an important point, the Local Plan is unable to accommodate this point under a planning remit. There are already existing arrangements for citizen science projects across the borough through various community and interest groups.
-		Policy 35. Green Belt, Metropolitan Open Land and Local Green Space		
917	James Armstrong, Richmond Cycling Campaign	Policy 35. Green Belt, Metropolitan Open Land and Local Green Space	- C. It will be recognised that there may be cases where inappropriate development, such as small-scale structures for essential utility infrastructure*, or cycle storage* may be acceptable. - D. Improvement and enhancement of the openness, character and use of the Green Belt and Metropolitan Open Land will be encouraged where appropriate. Measures could include improvements or enhancements to landscape quality (including visual amenity), biodiversity (including delivering biodiversity net gain) or accessibility *(including both for disabled persons, and for those travelling via Active Travel modes)*.	The Council have not included the first suggested amendment concerning cycle storage. Cycle stores could be considered an 'exception' or 'not inappropriate development'. Development proposals for this infrastructure will be tested against part B of the policy, in addition to paragraphs 137 to 151 of the NPPF. This criterion has now been removed from the policy as it is considered appropriate to state in the supporting text, rather than in policy. The Council have added the second suggestion to part D of the policy, so that this section reads; "Improvement and enhancement of the openness, character and use of the Green Belt and Metropolitan Open Land will be encouraged where appropriate. Measures could include improvements or enhancements to landscape quality (including visual amenity), biodiversity (including delivering biodiversity net gain) or accessibility (to improve inclusive mobility and promote Active Travel modes).
918	Theresa Oddelm, The Royal Parks	Policy 35 Green Belt, Metropolitan Open Land and Local Green Space	We are very aware of the importance of this policy and its equivalent in the NPPF and London Plan, given that both Bushy and Richmond Parks are designated MOL, and therefore welcome the inclusion of the policy in the Local Plan.	Noted.
919	Alice Shackleton, on behalf of The Kew Society	Policy 35 Green Belt, MOL and LGS	A : change "very special" to "exceptional" - these spaces must be given the fullest protection	'Very special circumstances' is the term used in paragraph 148 of the NPPF that sets the bar for what may be considered appropriate development in the Green Belt. The Council will therefore retain the wording used.
920	Gary Backler, Friends of the River Crane Environment (FORCE)	Policy 35. Green Belt, Metropolitan Open Land and Local Green Space	We welcome the very clear statement that "The borough's Green Belt and Metropolitan Open Land will be protected and retained in predominantly open use," and the associated test of 'very special circumstances' for development. We also welcome the commitment that "When considering developments on sites in proximity to Green Belt or Metropolitan Open Land, any possible visual impacts on the character, local distinctiveness, and openness of the Green Belt or Metropolitan Open Land will be taken into account." As noted above, we are particularly concerned to uphold the sense of "escape" and associated mental-health benefits provided by natural vistas uninterrupted by visible and overbearing developments; and we are keen to avoid the	Noted.

			intrusion of light from such developments into dark corridors. We welcome the proposal to make no changes to the borough's Green Belt boundaries (21.14)	
921	Tim Catchpole, Mortlake with East Sheen Society	Policy 35. Green Belt, Metropolitan Open Land and Local Green Space	There is no mention here of the importance of playing fields and other Green Belt land as flood storage areas. On the Brewery site, for example, the playing fields are in Flood Zones 2 and 3 and should remain green. Incidentally we are aware that the Mortlake Brewery Community Group applied to the Council to have these playing fields designated as Green Space but that there has been no positive response and we would like to know the reason.	The Council have not made changes to Policy 35 based on these comments. The test for development on Green Belt/MOL is that 'very special circumstances' must exist for development to take place in the Green Belt (NPPF paragraph 148) which will allow the Green Belt/MOL to carry out functions such as maintaining the green infrastructure network. Policy 8 of the draft Local Plan sets out measures that applications for development should take, including undertaking a sequential test, where necessary an exception test and for major applications in flood zones 2 and 3, flood emergency plan. Paragraph 16.62 states that "Redevelopment of existing developed sites will only be supported if there is a net flood risk reduction" which includes increasing flood storage capacity. Our Green Belt, MOL, LGS and OOLTI Review (2021) states that the Stag Brewery site was considered for partial local green space (LGS) designation, however the 'land is allocated within the current Local Plan and there is a current planning application.' The playing fields are designated as Other Open Land of Townscape Importance (OOLTI) and it is recommended that the playing fields should be retained and/or re-provided and upgraded within the planning application.
922	Jon Rowles	Policy 35. Green Belt, Metropolitan Open Land and Local Green Space	Terminology should match that in the NPPF and London Plan more closely otherwise developers and their expensive barristers could get around it.	Noted.
923	Vicky Phillips, Habitats & Heritage	Policy 35. Green Belt, Metropolitan Open Land and Local Green Space	Policy 35 - Removal of MOL designation from carpark for Sainsbury's, Uxbridge Road, Hampton – see above [See comment 298 on site allocation].	Noted.
924	Alice Roberts, CPRE London	Policy 35 - Green Belt, Metropolitan Open Land and Local Green Space	The wording of this policy is not compliant with London Plan or NPPF. It suggests MOL has policy goals and therefore leaves MOL in the borough open to threat from development.	The Council believe that the wording within Policy 35 is appropriate and in line with the wording on MOL set out in the NPPF and London Plan. The London Plan sets out that MOL should be treated the same as Green Belt land, and the NPPF sets out the conditions for development on land with these land use designations. The Council will amend the final sentence of Policy 35 Part B to read; "Development will be supported if it is appropriate and helps secure the objectives of improving the Green Belt or Metropolitan Open Land, subject to national planning policy tests. "
925	Nina Miles, GLA on behalf of Mayor of London	Policy 35. Green Belt, Metropolitan Open Land and Local Green Space	We are pleased to note the strong protection of the Green Belt in accordance with policies G2 and G3 LP2021 and that you are following recommendations of the Open Land Review 2021 that recommended all designated Green Belt for retention. With regards to MOL we note that the study identified the majority of MOL as performing strongly but with some specific areas scoring weakly against MOL criteria including the Sainsburys car park, Hampton site that you are proposing for release and allocation for 100% affordable housing along with restoration and enhancement of the wildlife corridor. I note that you are also proposing to release two sites that comprise of front gardens. Any alterations to the boundary of MOL should only be changed in exceptional circumstances when this is fully evidenced and justified, taking into account the purposes for including land in MOL set out in Part B of Policy G3 LP2021. None of the three sites appear to meet the criteria for inclusion as MOL and therefore the Mayor raises no objection at this stage to the proposed release of these sites, subject to detailed justification being provided in the supporting evidence.	Noted.
926	Gary Rhoades-Brown	Green Belt, MOL, LGS and OOLTI Review	Given the acute development pressures in the south east and in south west London, I am particularly interested in Green Belt boundaries and maintaining the openness of the Green Belt. I agree with the ARAP study that all of the Green Belt is performing well against the criteria within the NPPF. I am pleased to see that there are no proposals to amend the Green Belt boundaries in this Local Plan. I live in Hampton. I am generally supportive of the specific allocated site proposals for Hampton with the following caveats - The existing car parking facilities supporting the Uxbridge Road Sainsbury store are critical for its operation. Adequate car parking must be retained for customers. Releasing the MOL designation for 100% affordable housing development will only work if a very large car park is retained for customers visiting the store and parking facilities are provided for the new development. - Similarly, the Hampton Square proposals must take into account that adequate car parking for customers of the shops be retained. The car park is sometimes full and cars spill out and park on the adjacent road creating difficulties for moving traffic. This occurs at school drop off and pickup times and when there are functions in the White House. Further development may necessitate additional car parking. Clarification within the wording of these site specific proposals would alleviate my concerns.	See response to comment 298.
927	Peter Willan and Paul Velluet, Old Deer Park Working Group	MOL Review – naming of Parcel 28 and Parcel 31	The Arup MOL Review Annex Report; a Parcel 28 page 92 is titled Little Green. It should be Richmond Green, b Parcel 31 page 101 is titled Thames Old Deer Park. It is not part of the Old Deer Park.	The Open Land Review has been updated in 2023 to incorporate these suggestions for the site assessments.
928	David Taylor	Former Thames Water Operational land adjacent to west of Sunnyside Reservoir, Lower Hampton Road, Hampton	The pre-publication version for consultation of the future 2024 Plan (page 2 of 'Sites not to be Considered' document) states that my above pocket of land will be excluded from review because 'the site is located within the Green Belt AND the Open Land Review 2021 found that the (defined) General Area (part of area No 5) performed strongly against the NPPF Green Belt purposes. In the light of this, there are no proposed changes to the Green Belt boundary in draft Local Plan'.	The Council have not amended the policy based on the comment received. The site sits within General Area 5 (GA5) of Arup's assessment. GA5 forms the entire gap between Hampton Village, Molesey and Sunbury-on-Thames and provides a physical and visual buffer to merging of settlements. It performed weakly on one



		<p><u>The first GB claim is simply untrue: for the second my land is extremely weak in meeting NPPF criteria.</u></p> <p><u>1/ Claimed designation as Green Belt</u></p> <p>Both the Spatial Planning and Design Team Manager (Ms Kitzberger-Smith) and the Cabinet Member responsible for Environment & Planning (Cllr Elengorn) are well-aware of the contentious short shortcomings & omissions in their claimed GB designation process of this pocket of land (it's boundary identified in BLUE on attached map). A brief history: -</p> <ul style="list-style-type: none"> • Until 1993 the land, then owned by as Thames Water, was part of Spelthorne BC who have confirmed that it was not designated as GB in their UDP of 1991. Contemporary maps show the designated GB boundary (in GREEN) directly following the prominent and permanent western and southern Reservoir embankments of Sunnyside and Stains Hill Reservoirs respectively (highlighted in YELLOW) – <i>'using physical features that are readily recognisable and likely to be permanent'</i> - exactly as recommended in NPPF legislation. • In 1993, the LB Richmond <i>administrative</i> boundary was moved westwards (shown in RED), to incorporate the whole of the Sunnyside reservoir plus was dog-legged to also include my adjacent 'blister' patch of storage land, rather than the significant physical reservoir features.. • The October 1996 adopted Richmond UDP includes policy statement ENV4, with supporting maps, specifically identifying some newly approved GB land designation to the south and east of Sunnyside reservoir (shown by BROKEN GREEN line). These location changes are crystal-clear on Map 4 in this UDP. There is no policy claim that makes any reference to any GB extension westwards to encapsulate my small outlier patch of adjacent land, containing storage sheds and hard standing. <p>The UDP did also include a 'summary' map claiming to show all GB in the Borough in which my pocket of land appears coloured green – there is no supporting commentary or policy justification for this implied change to the GB boundary to encapsulate what later became my land. This identical map has since been simply duplicated, still without any comment justifying such a change, in Richmond's LP's of 2005 and 2019. Both these LP's confirm they avoided any review of GB land and state no further changes to Borough's GB were made (after 1996 policy ENV4).</p> <ul style="list-style-type: none"> • I purchased the orphan plot of land in 2016 after sight of the new 2016 Hampton Village Plan SPD map and the usual property searches; neither showed my land as GB. The published 2016 Planning document, contained a preface stating it <i>'can be used to guide new development'</i> with a <i>'Green Infrastructure in Hampton'</i> map clearly showing my land as not being GB designated, exactly in-line with the ENV4 policy and map of the earlier 1995 UDP – clarifying, as the latest published planning document, the lack of clarity created by the contradictory UDP maps. After full public consultation, the 2016 Hampton SPD document & map were adopted, without change, by Richmond Council on 1.6.2017 and subsequently became an integral part of Richmond's final 2018 LP. • I was thus totally surprised to be told at a Pre-App meeting in 2017 that <i>'Richmond consider the land to be GB. We consider all Thames Water land to be GB'</i>. An identical spurious claim of ownership justifying designation was made by the LBRUT Solicitor in 2019. Land ownership has never been a criterion under NPPF to justify GB designation. • At the same time Borough Solicitor confirmed that LBRUT do not have ANY evidential records of due process of proposal, public consultation, nor the specific Council numbered policy approval required to legally designate my land as GB. The only logical place for such a record to reside would be in the 1996 UDP document – that UDP document still exists and is complete but contains no such record. Ergo, without evidence, any such a claim by Richmond of GB designation is invalid. <p><u>2/ My pocket of land's performance against NPPF GB criteria</u></p> <p>The larger 'General Area 5's performance probably does 'perform strongly' against NPPF GB purposes – apart from my small pocket of land within it. My lands performance against the 3 relevant NPPF Purpose criteria of 1/ checking unrestricted urban sprawl 2/ preventing neighbouring towns coalescing 3/ and safeguarding the countryside, is considered below</p> <ul style="list-style-type: none"> • Against PURPOSE 1. My small, orphan patch of land (BLUE) is firmly constrained on all 4 sides: - <ul style="list-style-type: none"> - to the west and south (all in Spelthorne BC) by long-established residential properties. – - to both the east and north it directly abuts the substantial physical embankments (YELLOW) of Stain Hill and Sunnyside reservoirs – already existent for in excess of a century. <p>Historically, under Spelthorne's custody, the GB boundary (GREEN on attached map) closely followed the Reservoir embankments throughout; Richmond's purported new GB boundary post 1996 makes right-angle turns away from these physical features to follow transitory wooden residential garden fences and a house driveway. If the latest review was genuinely selecting permanent features for the boundary identification of General Area 5 (as claimed in C1.2.2) the GB boundary would follow the reservoirs' embankments, as it did under Spelthorne's custody. C1.2.1.2 goes on to say <i>'in cases where the (claimed) Richmond (general area) boundaries do not coincide with permanent and durable features, General Areas overlap with Green Belt in neighbouring authority areas to align with the nearest durable feature'</i> (my underlining). Yep, which brings us right back to using the adjacent 'permanent physical feature' - the reservoir embankments, as used by Spelthorne in their 1991 UDP GB boundary (GREEN). Without due consultation, or policy approval Richmond may, or may not (depending on which Richmond map you choose) have added a 'kink' to justify their claimed encapsulation of my small pocket of land,</p> <ul style="list-style-type: none"> • Against PURPOSES 2 & 3. My land does not protect a gap between 'contiguous' settlements – Sunnyside and Stain Hill reservoirs do that. It is also a brownfield site containing three long derelict storage buildings and a substantial area of concrete hard-standing for vehicles. It is certainly at the 'urban character' end of the Purpose 3 spectrum, with minimal 'rural' character'.. <p>But for Richmond's repeatedly postulated but flawed claim that my land is GB, a thoroughly objective assessment (under C1.2.1.2) would almost certainly classify my land as an enclosed <i>'smaller scale sub-area with a view to possible further detailed assessment beyond this Assessment'</i>. To use your phrase, it's a potentially an enclosed 'infill' site.</p>	<p>criterion as it has an urban character, but overall GA5 was assessed as strongly performing against NPPF purposes and no weakly performing sub-areas were identified for further assessment.</p>
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			<p>3/ General</p> <p>The 2021 London Plan, as approved by the Secretary of State, required all London Boroughs to review their GB designated land with a view to considering releasing weak GB land for, amongst other things, new-built residential properties of all kinds to address the housing crisis. In the case of Richmond this will be the first such overall GB review in 30 years. The final 2017 LP Examination in Public consultation was emasculated by Council’s Pre-Examination instruction to SoS Inspector David Seaman ‘to exclude Green Belt from his Examination’: he nevertheless was sufficiently concerned about the status of my pocket of land to add 2 paragraphs & a specific codicil into the final LP that Council should satisfy themselves that their GB boundaries concerning this land were correctly depicted and they should correct any errors found. Richmond simply repeated their mantra that they considered all their GB boundaries to be correct – though no evidence was ever provided justifying this conclusion. And the final 2019 LP still includes the Hampton Village Plan SPD document map, approved in 2017, showing my land as non-GB.</p> <p>Even from just desk research, any thorough new survey in 2021 of GB boundaries against NPPF criteria for ‘General Areas’ (as claimed in sentence one of C1.2.1.2), should have quickly identified the Reservoir embankments as providing the desired ‘readily recognised and likely to be permanent feature’ and ‘would recognised these principles from the start’. And wholly within LBRUT’s administrative area. Did none of the 2021 researchers ever visit Lower Hampton Road to review this known to be anomalous and disputed setting? If not, why not?</p> <p>In reality, my patch of land probably provides the almost perfect example of an ‘Infill’ site, as defined in C1.2 ‘Illustration of Connected, Contiguous and Enclosed’ land - fully enclosed by residential Lower Sunbury homes on two sides, and the very permanent embankments of Sunnyside & Stain Hill reservoirs on the other two. My land meets all your ‘weak’ achievement levels of NPPF to be considered for further consideration under Stage 2 review. Yet apparently it has been totally missed, or dismissed. Either way, solely relying on the basis of Officers’ knee-jerk view that ‘its GB because we say its GB’. Unless it is given further consideration in Stage 2 analysis, it will be a travesty of the original SoS Direction for Richmond to undertake an objective review of their GB, including Public and Inspector scrutiny of proposals and their justification at the planned Examination in Public. Such a blinkered approach as excluding a detailed review of my known to be contentiously claimed GB designation site would create a potential flaw in the voracity of the proposed 2024 LP that would then be open to further challenge.</p> <p>Attached: Plan of Boundaries around submission land [See Appendix 11 for a full page version of plan below]</p> 	
<p>929</p>	<p>Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)</p>	<p>Policy 35 – Green Belt, Metropolitan Open Land and Local Green Space</p>	<p>We respond here on MOL status for Richmond Green, Policy 35, which is significantly undervalued by Arup’s MOL Review Annex Report, and on Riverside North of Richmond Bridge and Riverside South of Richmond Bridge.</p> <p>Under the heading ‘Proposed changes to the Policies Map’ the landscaped open-space setting of the listed Pools-on-the-Park complex in the Old Deer Park Working needs to be annotated as Metropolitan Open Land in the Policies Map as repeatedly urged by the local community over the last forty years in order to reflect its significant functional and landscape roles and in order to relate to the designation of the surrounding parkland as Metropolitan Open Land. In this connection, it is noted that neither Section 2 nor Section 15 of the draft Local Plan appears to include any reference to a Policies Map. Referring to the note contained under ‘Policies Map for the Local Plan Review, 2015-2018’ in the part of the Council’s current Planning Policy web-site dealing with the current ‘Adopted Local Plan’ (adopted in July, 2018), it is clearly stated that ‘The Council’s Policies Map (formerly called the Proposals Map) will be updated in 2020 to reflect the Local Plan adopted in July, 2018 and March, 2020’. However, to date, this has never been done. There is no published Policies (formerly Proposals) Map beyond that published in July 2015. Prospect of Richmond has picked-up this omission in previous submissions. The omission needs to be urgently remedied.</p>	<p>The Council, through the Arup Open Land Review (2021) only assessed existing MOL based on mapping from 2015. It is not the Council’s intention to identify new parcels of land for MOL for the new Local Plan.</p> <p>Arup, in their Open Land Review 2021, separated parcel 26 from parcel 24 using accepted methodology for undertaking MOL reviews in line with national Green Belt policy, which states boundaries are to be defined ‘using physical features that are readily recognisable and likely to be permanent’ (paragraph 143, NPPF), in this case the A316. This eastern part of the parcel is still designated as a Registered Park and Garden, however due to a lack of ‘openness’ it is considered that it cannot be recommended to meet MOL purposes on this feature alone. The Council do not propose to change the MOL designation of this site in line with the Reg 18 plan.</p>

			<p>(In Arup's 156-page Metropolitan Open Land Review - Annex Report, the Old Deer Park South of A316 'Parcel' (sic) – no. 26 has been severed, wholly unjustifiably, from the remainder of the Old Deer Park covered in the Old Deer Park and Kew Gardens 'Parcel' – no. 24 and that part of the Park contained in the Old Palace Lane Richmond Riverside 'Parcel' – no. 29), despite its forming an integral part of the Old Deer Park as a specifically registered historic park and a specifically designated conservation area, and its designation with those parts of the Park on the north-western side of the Twickenham Road and the south-eastern side of the railway viaduct as Metropolitan Open Land and Public Open Space. Importantly, this part of the Park is the most readily and easily accessible part of the public Park from the remainder of the Town and the Riverside on foot given its proximity to the heart of the Town and public transport and car-parking provision. Such a severance in the Metropolitan Open Land Review reflects a fundamentally flawed analysis of the area. Similarly and equally open to serious question is the finding that 'the eastern third of the parcel, is developed and does not meet the MOL criteria' and that its MOL status should be considered further. The parcel is certainly NOT 'largely inaccessible to people' as claimed in the assessment; not least, because it provides an integral part of a direct pedestrian link between Richmond Station, Parkshot, Park Lane, the Old Deer Park Car-park, Richmond Green and the riverside at its south-western end.</p> <p>In relation to the The Green and Little Green, Richmond 'Parcel' – no. 28, the assessment that these two, vastly important, inter-related public open spaces are only assessed as only 3, 2, 3, 3 and 3 in the criteria summary, rather than as 5, 5, 5, 5 and 5, clearly reflects a fundamentally flawed analysis of the area and failure to recognise its accessibility to the riverside and the heart of the Town. Described by Bridget Cherry and the late Nikolaus Pevsner in relevant volume of The Buildings of England – London 2: South as 'one of the most beautiful urban greens surviving anywhere in England', Richmond Green possesses not only considerable architectural, historic and landscape interest and significance, but importantly, constitutes a public open space of outstanding amenity value to the local and wider community.</p>	<p>For criterion 4, the assessment considers whether the parcel forms part of a strategic corridor, node or link in the network of green infrastructure. A large amount of the parcel is unfenced lawn, which could be used by people, but as it has no formal access routes (apart from a small section of the Thames Path), it was considered to provide limited access links for people. Whilst the eastern third of the parcel is publicly accessible, due to its developed nature (a public car park), it was not considered to contribute to the green infrastructure network. The parcels contribution to the River Thames path was considered, scoring moderate (3) overall, despite most of the parcel scoring more weakly.</p>
930	Peter Willan and Paul Velluet, Old Deer Park Working Group	Policy 35. Green Belt, Metropolitan Open Land and Local Green Space	<p>We respond here on MOL status and boundary anomalies and seek to remove any question of an important part of the Old Deer Park ceasing to being designated as MOL, as raised in Arup's MOL Review Annex Report. We comment further on Policy 35 Green Belt, Metropolitan Open Land and Local Green Space.</p> <p>Under the heading 'Proposed changes to the Policies Map' the landscaped open-space setting of the listed Pools-on-the-Park complex in the Old Deer Park Working needs to be annotated as Metropolitan Open Land in the Policies Map as repeatedly urged by the local community over the last forty years in order to reflect its significant functional and landscape roles and in order to relate to the designation of the surrounding parkland as Metropolitan Open Land. In this connection, it is noted that neither Section 2 nor Section 15 of the draft Local Plan appears to include any reference to a Policies Map. Referring to the note contained under 'Policies Map for the Local Plan Review, 2015-2018' in the part of the Council's current Planning Policy web-site dealing with the current 'Adopted Local Plan' (adopted in July, 2018), it is clearly stated that 'The Council's Policies Map (formerly called the Proposals Map) will be updated in 2020 to reflect the Local Plan adopted in July, 2018 and March, 2020'. However, to date, this has never been done. There is no published Policies (formerly Proposals) Map beyond that published in July 2015. Prospect of Richmond has picked-up this omission in previous submissions. The omission needs to be urgently remedied.</p> <p>(In Arup's 156-page Metropolitan Open Land Review - Annex Report, the Old Deer Park South of A316 'Parcel' (sic) – no. 26 has been severed, wholly unjustifiably, from the remainder of the Old Deer Park covered in the Old Deer Park and Kew Gardens 'Parcel' – no. 24 and that part of the Park contained in the Old Palace Lane Richmond Riverside 'Parcel' – no. 29), despite its forming an integral part of the Old Deer Park as a specifically registered historic park and a specifically designated conservation area, and its designation with those parts of the Park on the north-western side of the Twickenham Road and the south-eastern side of the railway viaduct as Metropolitan Open Land and Public Open Space. Importantly, this part of the Park is the most readily and easily accessible part of the public Park from the remainder of the Town and the Riverside on foot given its proximity to the heart of the Town and public transport and car-parking provision. Such a severance in the Metropolitan Open Land Review reflects a fundamentally flawed analysis of the area. Similarly and equally open to serious question is the finding that 'the eastern third of the parcel, is developed and does not meet the MOL criteria' and that its MOL status should be considered further. The parcel is certainly NOT 'largely inaccessible to people' as claimed in the assessment; not least, because it provides an integral part of a direct pedestrian link between Richmond Station, Parkshot, Park Lane, the Old Deer Park Car-park, Richmond Green and the riverside at its south-western end.</p> <p>In relation to the The Green and Little Green, Richmond 'Parcel' – no. 28, the assessment that these two, vastly important, inter-related public open spaces are only assessed as only 3, 2, 3, 3 and 3 in the criteria summary, rather than as 5, 5, 5, 5 and 5, clearly reflects a fundamentally flawed analysis of the area and failure to recognise its accessibility to the riverside and the heart of the Town. Described by Bridget Cherry and the late Nikolaus Pevsner in relevant volume of The Buildings of England – London 2: South as 'one of the most beautiful urban greens surviving anywhere in England', Richmond Green possesses not only considerable architectural, historic and landscape interest and significance, but importantly, constitutes a public open space of outstanding amenity value to the local and wider community.</p>	<ul style="list-style-type: none"> The Council, through the Arup Open Land Review (2021) only assessed existing MOL based on mapping from 2015. It is not the Council's intention to identify new parcels of land for MOL for the new Local Plan. Arup, in their Open Land Review 2021, separated parcel 26 from parcel 24 using accepted methodology for undertaking MOL reviews in line with national Green Belt policy, which states boundaries are to be defined 'using physical features that are readily recognisable and likely to be permanent' (paragraph 143, NPPF), in this case the A316. This eastern part of the parcel is still designated as a Registered Park and Garden, however due to a lack of 'openness' it is considered that it cannot be recommended to meet MOL purposes on this feature alone. The Council do not propose to change the MOL designation of this site in line with the Reg 18 plan. For criterion 4, the assessment considers whether the parcel forms part of a strategic corridor, node or link in the network of green infrastructure. A large amount of the parcel is unfenced lawn, which could be used by people, but as it has no formal access routes (apart from a small section of the Thames Path), it was considered to provide limited access links for people. Whilst the eastern third of the parcel is publicly accessible, due to its developed nature (a public car park), it was not considered to contribute to the green infrastructure network. The parcels contribution to the River Thames path was considered, scoring moderate (3) overall, despite most of the parcel scoring more weakly. The Council have amended criterion 4 to reflect the points set out above.
-	Anna Stott, WSP on behalf of Sainsbury's	Policy 35. Green Belt, Metropolitan Open Land and Local Green Space, Site Allocation 5: Carpark for Sainsburys, Uxbridge Road, Hampton	[See comment 299 against Site Allocation 5 in relation to the removal of the site from MOL]	-
931	Geoff Adams, Putney Town Rowing Club	MOL Review Analysis by Arup - Detailed Version, Site Number 21 - Parcel: Mortlake Cemetery East, Townmead Kew, & Thames Kew East	<p>These comments are on behalf of the Rowing Club.</p> <p>The site MOL 21 is recognised and we are the only rowing club on the Thames between Putney and Kingston.</p> <p>The area covered by MOL 21 should include the car park adjacent to the boathouse/gatehouse together with the school playing field adjacent and to the West.</p>	<p>The Council have used the MOL boundaries from 2015, which does not include the car park or playing fields outlined in the comment. The Council have decided not to consider additional areas for MOL designation for the new Local Plan.</p>

932	Arthur Gelling	MOL Review Parcel 42: Fulwell Golf Club	<p>Although the allotments are included in the site there is no mention of them in the text.</p> <p>My response relates to the MOL review – and in particular, the proposal to remove MOL status from the Sainsbury St Clare car park, which connects MOL1 to the David Lloyd site (within MOL42). MOL 42 “Fulwell Golf Course” while I don’t disagree with the outcome (“conserve” status) on MOL 42, I am really concerned by the number of inaccuracies, errors and omissions in such a brief summary:</p> <ol style="list-style-type: none"> 1. The first photo is titled as Strawberry Hill GC – either the wrong site/photo, or caption 2. There is a reference to only the one (private) Fulwell Golf Course, but no mention of the publicly accessible (fully walkable) public (membership not required) Twickenham Course run by David Lloyd – which occupies around one-third of the total MOL area. This surely profoundly changes the sports/leisure access and green space accessibility assessment. 3. There is no mention of the public access semi-natural grassland and scrub areas behind David Lloyd – popular as kickabout, dog-walking, picnicking, exercise groups etc. again impacting on score for access for the public. 4. There is no mention of the allotments alongside the B358 Sixth Cross Road... which must also count in scores for public use/access. 5. The report states “there is no direct public access to, or within the parcel” This is despite the fact the London Loop strategic footpath (public right of way runs north-south straight through the MOL) and there is public access to around one-third of the MOL area. 6. The “Place” is titled as “Twickenham, Strawberry Hill and St Margarets”, but it is actually between Twickenham, Hanworth (not “Hamworth” as per typo in another paragraph) and Fulwell. 7. There is no mention of the Burton’s Road area’s deficit in local open space provision – though I suppose this may not be an MOL criterion, even if it is of importance within the Borough. 8. The neutral / lowland acid grassland, found within the David Lloyd “Hampton Heath” area and both golf courses, emerging scrub habitat, and numerous 200 year old oak trees, protected species (such as grass snake), unusual invertebrates, waxcap fungi etc. and SINC status suggest a higher score for biodiversity. Again no mention made of any of these features. 9. MOL42 directly contributes to habitat/greenspace connectivity due to its proximity to the rail corridor (which is not mentioned, but is a well-established, continuous linear green corridor) as well as its indirect connectivity to Longford River – which is mentioned. This means the site contributes to broader habitat and green infrastructure connectivity to a greater degree than is recognised in the report. <p>Unless there are defined “procedural reasons” in the MOL review process, I think these errors/omissions could have significant potential to result in higher scores for the MOL Criteria (especially 2, 3, and 4), and should be reviewed.</p>	<p>Agreed. Amend the caption to read; “View northeast over Fulwell Golf Club with views of mature trees.”</p> <p>The recreational value Twickenham Course is considered under criterion 2 ‘and the small western tip is part of a sports centre facility which is of local neighbourhood level for sports importance.’ (p135). Whilst the Twickenham Course is fully walkable, it has poor connectivity as there is only one public access point due to backs of houses and fencing, preventing connections to surrounding public rights of way. Therefore, the facility provides minimal contribution to a strategic corridor in the network of green infrastructure as noted in the assessment of criterion 4. Amend criterion 2 to read; “The parcel contains the Fulwell Golf Club, Twickenham Golf Course and the small western tip which is part of a sports centre facility...”</p> <p>The area behind David Lloyd is described above. The recreational activities mentioned are relevant to criterion 2. Whilst it is noted the space supports valued and important recreational activity, these activity types are of very local level catchment based on the methodology and therefore do not change the parcel’s score of weak-moderate (2) for criterion 2. As the parcel scores moderate (3) or more for both criterion 1 and 4, the parcel still fulfils its purposes as MOL despite not scoring as well on this criterion. Amend pro forma criterion 1 assessment to specifically reference semi-natural grassland so that it reads; “There is a mosaic of open grassland, semi-mature grassland, scrub and mature trees that are stand alone as well as a woodland belt.” No changes to scores will result.</p> <p>Unless the allotment features a Public Right of Way, they provide minimal contribution to criterion 4 in terms of public access and connectivity, as they are only accessible to a small number of people. Therefore, it is considered that overall the nature of recreational facilities is still primarily local, outweighing the borough level importance of the allotments, resulting in a score of weak-moderate (2). Therefore, no change to the score is suggested. Amend pro forma criterion 2 to read; “The parcel contains the Fulwell Golf Club and the small western tip is part of a sports centre facility which is of local neighbourhood level for sports importance. The parcel also contains a small area of allotments of borough recreational importance. As the allotments form a very small part of the parcel, overall, the parcel mainly functions at neighbourhood level and therefore scores weak-moderate (2) for criterion 2.”</p> <p>The north-south Public Right of Way (PRoW) which forms part of the London Loop has been incorrectly missed out of the assessment. The below actions incorporate this feature into criterion 4 and 3, and suggests that the score for criterion 3 should be amended. This does not change the overall recommendations for the parcel, as it already fulfils its purposes for MOL meeting criteria 1 and 4. Amend criterion 4 text to read as follows (amendments in red): ‘There are two PRoW, one along the outer edge of the southern boundary and one running north-south which forms a small part of the London Loop metropolitan trail. The parcel contributes to a very fragmented section of the London Loop with large distances to adjacent green spaces on the route. Internally, the parcels access network is limited due to there being no public access due to more than half the parcel being within Fulwell Golf Club. The parcel provides a large standalone green space with continuous habitat. As it lies within close proximity (approximately 200m) from the Longford River, it may indirectly contribute to a strategic river wildlife corridor. As the parcel is likely to provide a small contribution to a strategic wildlife corridor along a river corridor, and it has a partial green access network which provides a minor strategic function for the London Loop, it scores moderate (3) for criterion 4.’ The Council will amend criterion 3 score to moderate (3) and add the following text: ‘The parcel contains small part of the London Loop which is a metropolitan recreational trail.’ Amend criterion 3 text final sentence ‘As the parcel forms a small part of a recreational trail of metropolitan significance, this outweighs its local biodiversity value and therefore scores moderate (3) for criterion 3.’</p>
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				<p>With regards to the comment on the Burton’s Road area’s deficit in local open space provision, this is not a consideration within MOL criteria as set out within the London Plan.</p> <p>With regards to the parcel’s proximity to the rail corridor, the parcels proximity to the rail corridor was not mentioned as there is very limited green space adjacent to the railway either side of the parcel, therefore it was considered that its function as a green corridor was limited. Overall, the parcel is too isolated from other large green spaces to form part of a strategic green link of London-wide importance. Despite its contribution to the London Loop, it only has a partial access network due to over half of the site being private land and therefore it can only score moderate (3) for criterion 4. A score of moderate (3) for any one of the criterion fulfils MOL purposes and any higher scores makes no difference to the assessment recommendations; there is no benefit to a higher score. As noted in response to point 4 and above, the score for criteria 2 and 4 is not possible to change.</p>
933	Arthur Gelling	MOL Review Parcel 1: Longford E & Schools	<p>I am a Chartered Landscape Architect with 32 years’ experience of working with landscape policy. I have lived in Hampton Hill for more than 30 years, and have practiced from a home office for the last two years. I am also now Chair of a recently formed Hampton Heath Friends Group (affiliated with Habitats and Heritage) which is currently cleaning up and introducing habitat management to the areas behind David Lloyd, Hampton, and I attend SWLEN/Richmond Biodiversity Partnership meetings. My response relates to the MOL review – and in particular, the proposal to remove MOL status from the Sainsbury St Clare car park, which connects MOL1 to the David Lloyd site (within MOL42).</p> <p>Comments on the MOL Review are as follows: On MOL 1 (Longford E and Schools):</p> <ol style="list-style-type: none"> 1. Photo annotations are incorrect (references to “Richmond Park” and “developed northern parcel section”) 2. The school playing fields do not separate Fulwell and Hanworth as stated. 3. Contrary to “There is no public access or PRoW within any part of the parcel” and “No PRoWs” there is a public right of way which crosses the Longford at Longford Close 4. The statement that the parcel “is likely to contribute to a wildlife corridor” is something of an understatement. It is a SINC. 5. There is no mention of the Longford River’s extraordinary historic and cultural heritage value, and its historic origins and ongoing function serving the waterways and fountains of Bushy Park and Hampton Court. 6. The conclusion seeks to differentiate between the value of the northern and southern portions of the Longford corridor – which are near identical in width, vegetation, channel and therefore value. The only difference is the adjacent school sports fields. <p>The northern portion of MOL 1 which is effectively “written off” by Arup does retain some natural and cultural heritage value, due to the corner of the Sainsbury car park site which is given over to dense tree planting, and a continuous band of trees and planting which follows the historic Borough Boundary. The mature tree row is continuous with that on the other side of the A312 Hampton Road East – MOL 42 (and SINC). The planted boundary strip was a Condition of the original planning for the Sainsbury site and still provides a narrow movement corridor for some wildlife. But the Sainsbury St Clare portion of the MOL has real importance in its retained potential to *reconnect* MOL 42 to MOL1 as a continuous habitat feature linking the rail corridor (east of MOL 42) to the Longford Corridor. Retaining at least a portion of this area as MOL corridor is therefore important to fulfilling Borough and London policy to reconnect habitats if/when the Sainsbury site is redeveloped.</p>	<p>Agreed. Amend the annotations to photo 1 and photo 2.</p> <p>The report only suggests that these two urban areas do not merge completely and therefore this is a positive feature for the MOL assessment and it is one of the main reasons that the parcel meets criterion 1 of MOL.</p> <p>Agreed. Amend the report to include details of the public access. This will not change the scores for any criterion.</p> <p>A biodiversity assessment was not undertaken as part of the study. This does not undermine the value of the SINC’s important contribution to the local river.</p> <p>The assessment of parcel 1 notes the local recreational and ecological importance of the Longford River however, as it is not designated for these attributes cannot be considered as part of the assessment based on the methodology.</p> <p>Add a sentence to criterion 4 to note the northern part of the parcel’s ecological contribution.</p>
934	George Voss, WSP on behalf of Petersham Nurseries Ltd	MOL Review Parcel 8: Ham House, Douglas House, Richmond Hill Rise, Ham Common, Ham Polo, Buccleugh Gardens, Greycourt School, Petersham Lodge, Peterham Meadows	<p>We have reviewed the Richmond Local Plan ‘The best for our borough’ and are broadly supportive of the Council’s approach and the policies set out within it. We are supportive of the economic policies given PNL is a major employer in the Borough. PNL has been open to the public since 2004 under the current ownership and employs over 170 staff who support retail and food and beverage. PNL prioritises employing locally with staff comprising of both full and part-time, the majority of whom live within a 5-mile radius. The business provides local employment opportunities across a range of sectors including buying, finance, marketing, human resources, retail, food and beverage, on site gardening, maintenance and floristry.</p> <p>PNL is located with Metropolitan Open Land (MOL), but this designation fails to meet the four criteria set out under London Plan Policy G3. We therefore suggest the boundary of the MOL should be revised and this is set out in further detail below.</p> <p>Metropolitan Open Land</p> <p>The Local Plan includes a review of the performance of the MOL against the designation criteria set out in Policy G3 of the London Plan. In order to be classified as MOL, land must meet four criteria. Land is assessed against the following criteria:</p> <ul style="list-style-type: none"> ▪ Criteria 1: Contribute to the physical structure of London by being clearly distinguishable from the built-up area; ▪ Criteria 2: Includes open-air facilities, especially for leisure, recreation, sport, the arts and cultural activities, which serve either the whole or significant parts of London; ▪ Criteria 3: Contains features or landscapes (historic, recreational, biodiversity) of either national or metropolitan value; and ▪ Criteria 4: Forms part of a strategic corridor, node or link in the network of green infrastructure and meets one of the above criteria. <p>Where Criteria 1-3 score ‘moderate’ or above (scoring a 3 out of 5), the plot will be assessed against Criteria 4. If all criteria are met and score a 3 or above on all criterial, the site will be retained within the MOL.</p>	<p>This was a Stage 1 MOL assessment which is strategic in nature and did not consider detailed boundary issues or variations within minor areas of a parcel. Detailed issues, such as smaller scale boundary changes, would need to be considered as part of a Stage 2 assessment, however the Council has decided not to progress with a Stage 2 assessment.</p>

			<p>The evidence base for the Local Plan, the Metropolitan Open Land Annex Report 2021, confirms that PNL is located within Parcel 8 “Ham House, Douglas House, Richmond Hill Rise, Ham Common, Ham Polo, Buccleugh Gardens, Greycourt School, Petersham Lodge, Peterham Meadows”. See Figure 1 below showing the location of the MOL and PNL has been outlined in blue.</p> <p>Figure 1. Parcel 8 MOL Boundary as currently drafted with PNL outlined in blue</p>  <p>PNL is surrounded by a high brick wall which clearly creates a physical boundary between the site and the wider MOL designation. Within the site, there are several permanent structures, including glasshouses, brick and timber buildings housing the restaurant preparation areas, toilets, staff offices and the teahouse. There are also temporary structures in the form of tables and chairs associated with the teahouse throughout the site.</p> <p>The MOL boundary for Parcel 8 rightly excludes the built-up form of development to the south of the site along Petersham Road and River Lane. However, when viewing the site on a map, it is clear that PNL is part of the built form and is physically and developmentally distinguishable from the open land at Petersham Meadows and Petersham Lodge to the north and northwest of the site.</p> <p>In June 1998, PNL was granted a Certificate of Lawfulness for Existing Use or Development (CLEUD) to establish the unrestricted use of the site for a garden centre under reference 98/0525. This CLEUD established the site as an open A1 use. The Use Class Order was updated in September 2020 and the operation of the entire PNL site is now Class E. On this basis and the way PNL operates, PNL does not meet MOL criterion 1 or 2.</p> <p>MOL Criterion 3 is not applicable to the site as PNL does not include any statutory or locally listed buildings nor contain features or landscapes of either national or metropolitan value.</p> <p>Whilst the surrounding area provides well connected green spaces an essential part of green and blue River Thames corridor of regional importance, the PNL itself does not provide a node or link in this network and does not meet criteria 4.</p> <p><u>Revised MOL Boundary</u></p> <p>As outlined above, PNL fails to meet all of the criteria to designate the MOL and the MOL boundary for Parcel 8 should be revised accordingly. The dense hedgerow and wall located immediately north of PNL provides a natural buffer between the site and Petersham Meadows which is distinguishable from the built environment (which includes PNL). We encourage the Council to revise the MOL boundary to exclude PNL (the area hashed in red below).</p> <p>Figure 2. Proposed revised boundary for Parcel 8.</p>  <p>Conclusions</p> <p>The site falls within Class E use and is a legible part of the developed area to the south and west of the site and the site no longer fulfils the MOL criteria set out in London Plan Policy G3. The boundary for the MOL should be redrawn to exclude the site. We hope that these representations will be incorporated in the next iteration of the plan, and that the Council takes this opportunity to engage constructively with PNL as a major investor and employer in the Borough.</p>	
935	Hannah Blunstone, CBRE on behalf of Rugby Football Union (RFU)	Metropolitan Open Land / Policy LP35	<p>London Plan Policy G3 (Metropolitan Open Land) sets out the purposes for designating MOL as follows:</p> <ol style="list-style-type: none"> 1. it contributes to the physical structure of London by being clearly distinguishable from the built-up area 	<p>The purpose of the MOL assessment was to assess the current value of land parcels against the MOL criteria and to suggest areas that the council should further consider as to their role as MOL within the new Local Plan.</p>

2. it includes open air facilities, especially for leisure, recreation, sport, the arts and cultural activities, which serve either the whole or significant parts of London
 3. it contains features or landscapes (historic, recreational, biodiverse) of either national or metropolitan value
 4. it forms part of a strategic corridor, node or a link in the network of green infrastructure and meets one of the above criteria.
 Policy G3 further states that alterations to MOL boundaries should be undertaken through the Local Plan process, when fully evidenced and justified.
 The context of site allocation SA13 acknowledges that part of the site is designated Metropolitan Open Land (MOL). An extract of the MOL parcel (no.36 - Kneller Chase Bridge) from the Metropolitan Open Land (MOL) Review Annex Report (detailed assessment) is provided as **Figure 2** below.



Figure 2 – MOL Parcel 36 (shaded green)

The context states that 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'. However, p.117 of the Metropolitan Open Land (MOL) Review Annex Report (detailed assessment) (2021) states: "The eastern edge of the parcel, hard standing associated with Twickenham Stadium, meets none of the MOL criteria and it is recommended that its MOL status is considered further".

An extract of the Report is provided as **Appendix 1** [See Appendix 12 to this schedule]. We consider the MOL Review Annex Report evidences and justifies the de-designation of the eastern edge of the parcel, in accordance with London Plan Policy G3. Photographs showing how this area is used on match days and the general condition of the land are provided as **Appendix 2** [See Appendix 12 to this schedule].

We therefore request that the strip of land and area of the allocation, is updated to properly reflect the Review's findings, and the hardstanding associated with the stadium is removed from MOL given it meets none of the MOL criteria. Associated amendments to the Proposals Map should therefore be made.

We suggest that this extract of the Site Allocation is reworded as follows. Current wording:

"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:

*"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 hard standing associated with Twickenham Stadium meets none of the MOL criteria and as part of this Local Plan Review, such land is removed from the designation. Notwithstanding, any development proposal would be required to meet Policy 35, and take into account possible impacts on the character, local distinctiveness and openness of the MOL adjacent**".*


Associated with the above, we suggest that the text below Draft Policy 35 (p.243) is updated. We propose that a fourth change to the Policies Map is added (addition in red 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.*

This site has been assessed by Arup as part of General Area 36. The Council have further considered the strip of land outlined in the comment, however the balance of planning factors has led to the Council's decision not to remove the land from the MOL designation and to retain the requirements as set out currently within Site Allocation 13 in relation to MOL.

<p>936</p>	<p>Ian Anderson, Lichfields on behalf of David Lloyd Leisure Ltd (David Lloyd)</p>	<p>Policy 35 – site specific MOL designation</p>	<p>Background David Lloyd is Europe’s premier health, racquets and fitness provider. David Lloyd has operated for over 30 years and owns some 99 David Lloyd clubs in the UK (including 3 Harbour Clubs) and a further 23 across Europe and the Republic of Ireland. David Lloyd has further ambitious growth plans both in the UK and Europe. The business has some 600,000 members and is a significant employer in the health and fitness market, employing over 8,000 people. These include an expert health and fitness team of over 2,000 professionals and more than 680 tennis coaches. David Lloyd Clubs had been awarded a Sunday Times Top 25 Best Big Companies award for the past four years, most recently in 2020. David Lloyd’s racquets’ facilities are unrivalled in the UK, with some 1000 tennis courts, 400 badminton courts and squash courts. In addition to the racquets’ facilities, across all clubs, David Lloyd has over 150 swimming pools and the company offers more than 10,000 exercise classes every week. David Lloyd also provides significant coaching programs for children, both as part of the normal operation of its clubs and as ‘outreach’ to local schools, colleges and other amateur organisations. It is estimated that every week some 25,000 children swim and some 16,000 receive tennis coaching at David Lloyd clubs. In addition to the core activities of racquets and health and fitness, a number of clubs also benefit from health and beauty spas, lounges, food and beverage, crèches, nurseries and specialist sports shops. The COVID-19 pandemic has brought into sharp focus the need for both fitness and mental resilience and David Lloyd are at the forefront of development both in fitness innovation across its clubs, and mindful-wellness through its classes and spas and approach to outdoor, as well as indoor, sport and recreation.</p> <p>Property Aspirations and Requirements In both the UK and Europe David Lloyd are continuing to expand and grow its portfolio whilst investing in its existing club estate. This investment in existing assets is necessary both to maintain a quality offer, given changing focuses in, sports and recreation and to ensure that clubs remain relevant and up to date, given significant parts of its portfolio are 25+ years old. Examples of this include investment in Spa facilities and outdoor Spa Gardens to respond more fully to health and well beings, greater in door tennis provision through permanent and seasonal all weather domes, outdoor pools and children’s play facilities.</p> <p>Employment David Lloyd’s largest format of club generates circa 80-100 full time equivalent jobs. The club targets local employment opportunities in the appointment of full time, part time and self-employed staff. In the majority of cases therefore, employment is sourced locally, targeting local job markets to fulfil the needs and function of the club. Additional services, including cleaning contractors, deliveries for the restaurant and maintenance requirements are, again, sourced locally where possible.</p> <p>Metropolitan Open Land: Policy 35 The MOL, as presently drawn by LB Richmond and proposed in the draft plan, does not follow any defensible boundary, cutting through the David Lloyd Club, its car park, outdoor pool and terraced areas and excluding the hard surface tennis courts. The drawn boundaries of MOL across the David Lloyd Club are therefore indefensible (see below).</p>  <p>The David Lloyd Club represents a significant built structure close to the junction of the A315/A302 with the A316 (Great Chertsey Road). Land to south of the Club is used for Golf practice and is considered by us to be weakly performing MOL. This could be released from the MOL, given its isolated nature.</p>	<p>This was a Stage 1 MOL assessment which is strategic in nature and did not consider detailed boundary issues or variations within minor areas of a parcel. Detailed issues, such as smaller scale boundary changes, would need to be considered as part of a Stage 2 assessment, however the Council has decided not to progress with a Stage 2 assessment.</p> <p>Although the area ‘south of the David Lloyd club’ is not explicitly discussed in the report, the area’s contribution was considered when writing the text summary and scoring for each MOL criteria.</p>
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			 <p>As part of the Reg.19 Review, the whole of the David Lloyd site should be excluded from MOL. This should include Club buildings, car park and tennis courts.</p> <p>Moreover, we further consider a defensible boundary could be drawn, southwards from the tennis courts, to exclude the southern portion of isolated MOL land, south of the Club to exclude this area of MOL, which appears to be 'weakly performing' in our view having regard to the wider MOL function.</p> <p>This area of MOL is largely self-contained, significantly annexed by the David Lloyd development with a 'bell mouth' to this part of the MOL being only approximately 35m and is well screened from the Road and surrounding residential properties. We note that the Council's assessment of the wider MOL within this area scores weakly across two of the criterion for MOL, and only moderately / moderately strong across the remaining, importantly no assessment is made of this southern portion of MOL, south of the Club which we consider annexed by the position of the MOL and in our view scores weakly.</p> <p>We therefore recommend changes to the text below Policy 35 excluding this area of land.</p> <p>[See comment 1129 in relation to Policy 39 and the SINC designation]</p> <p>Conclusion</p> <p>We appreciate that this is an early pre-publication stage of the document, however we would be grateful for these representations to be taken into account ahead of the publication of the Reg.19 Plan. We would welcome the opportunity to discuss the Representations further ahead of the Council's drafting of its Reg.19 Plan.</p>	
937	David Wilson, Thames Water	Policy 35 Green Belt - Hampton Water Treatment Works (WTW) – Proposed Green Belt deletion	<p>Hampton WTW is located in the Green Belt and given that it is one of the largest operational WTW and there will be a requirement for upgrades to support growth it is considered that the opportunity should be taken to remove the site from the Green Belt as part of the Green Belt Review to help facilitate development which will be necessary to support growth within the Borough and surrounding area.</p> <p>Hampton WTW was previously identified as an existing Major Developed site in the Green Belt in a previous adopted development plan in accordance with the former Planning policy Guidance Note 2 (PPG2) on Green Belts. However, PPG2 was removed with the publication of the NPPF which does not include provision for the designation of Major Developed Sites in the Green Belt. The Council did not therefore agree to designate Hampton WTW as an existing Major Developed Site in the current Local Plan in line with the NPPF.</p> <p>The operational Hampton WTW occupies 74.3 hectares (183.6 acres), is Thames Water's second largest works and is of strategic importance for London's water supply. It will be inevitable that further upgrades will be required over the plan period to increase capacity to meet growth being proposed in the London Plan and Local Plans or meet new treatment standards.</p> <p>Given that the WTW is essential infrastructure it is considered that there are exceptional circumstances to remove the Hampton WTW from Green Belt designation, as set out on the enclosed plan, in accordance with Policy G2 of the London Plan 2021.</p> <p>Essential upgrades to the WTW may be necessary to support growth and deliver environmental improvements. In this context development of the site will be essential to support growth and deliver sustainable development in line with the development plan strategy. The site is not currently open and incorporates significant areas of concrete/brick/metal tanks, plant, machinery and buildings and as such it would not be necessary for the site to remain open. There are a number of water bodies on the site, but these are man made filter beds and reservoirs which could not be maintained as such in perpetuity if they were to become redundant. As such, the designation of the WTW site as Green Belt goes against the requirements for designation of Green Belt land set out in Paragraph 139 of the NPPF.</p> <p>The aerial photo below illustrates the built up nature of Hampton WTW:</p> 	<p>A strategic Stage 1 assessment has been carried out that considered parcels of land rather than smaller, more specific areas of land. The assessment did however acknowledge the different characters within each General Area (for both Green Belt and MOL) and considered whether parts of the General Area performed weakly against each NPPF purpose in the case of Green Belt or London Plan criterion in the case of MOL.</p> <p>Overall, the whole of the GA5 was therefore assessed as performing strongly against NPPF purposes and no weakly performing sub-areas were identified for further assessment.</p> <p>A Green Belt or MOL review does not set out exceptional circumstance arguments, which will need to be demonstrated at the strategic and at site level if the Council proposes release of land in accordance with the NPPF/ London Plan. Although the outcomes from a review will form part of any exceptional circumstances case presented by the Council to support alterations.</p> <p>No alterations have been proposed to Green Belt boundaries as part of the Draft Local Plan (Regulation 18) consultation. It is therefore considered that any site-specific proposals in this Green Belt land would need demonstrate very special circumstances at application stage.</p> <p>In addition, a Stage 2 study was not identified by the Council as necessary for the borough, as there were no weakly performing Green Belt areas, so there was no recommendation for further assessment.</p>

			<p>Paragraph 134 of the NPPF states that Green Belt serves five purposes: to check the unrestricted sprawl of large built up areas; prevent neighbouring towns from merging; assist with safeguarding the countryside from encroachment preserve the setting and special character of historic towns and assist in urban regeneration. Given that the WTW site is existing developed site with built development and infrastructure on which further development will be required in the future in order to facilitate sustainable development within the borough and surrounding area, the site is not considered to align with the purposes of the Green Belt set out in Paragraph 134. It is therefore considered that the opportunity should be taken to remove the Hampton WTW from the Green Belt.</p> <p>We disagree with the findings of the Green Belt, MOL, LGS and OOLTI Review undertaken as evidence base for the Local Plan, and consider the site does not perform strongly in Green Belt terms. The Green Belt review is unclear as to which settlement sprawl is being referred to as the River Thames separates Molesey and Hampton and this part of Green Belt is not strategic in the whole parcel. The assessment of the entire parcel is flawed as it includes a number of different characters which perform differently against the Green Belt functions. To assume all of the land, including buildings and physical infrastructure is 'high performing' Green Belt is clearly flawed. It is therefore considered that the site should be removed from the Green Belt.</p>	
938	Mark Jopling, Udney Park Playing Fields Trust	Udney Park Playing Fields	<p>Please find the submission from the Chair of the Udney Park Playing Fields Trust, the charity set up in 2017 to protect Udney Park. The charities purpose is to ensure that the Pavilion and all of the surrounding green space serve the original founding charities' purpose that the site is a "War Memorial Sports Ground" and that a War Memorial Pavilion and Playing Field is maintained and accessible.</p> <p>We welcome the retention of Udney Park as an Asset of Community Value and Local Green Space in the Local Plan Pre-Publication Version. The additional protection confirmed by Council Committee in November 2021 that the Udney Park Pavilion is a Building of Townscape Merit and maintains its' status as a recognised War Memorial is important, especially as 2022 is the Centenary of Udney Park opening ceremony.</p>	Noted.
939	Vicky Phillips, Habitats & Heritage	New Local Green Space sites	we support these designations and would also ask you to consider Teddington Library Garden as an additional LGS.	Teddington Library Garden is within a conservation area and within the curtilage of a listed building, therefore due to this strong-performing heritage significance, there would not be any additional local benefit by designating the site as LGS.
-		Policy 36. Other Open Land of Townscape Importance (OOLTI)		
940	Philip Briggs, Richmond Bat Species Action Plan Steering Group	p.247, paragraph 21.24	<p>One of the criteria for defining Other Open Land of Townscape Importance (21.24) is "Value for biodiversity and nature conservation and meets one of the above criteria". Why is this the sole criterion which cannot stand on its own? Could the qualification "and meets one of the above criteria" be removed?</p>	The Council has not amended the supporting text as a result of this comment. Site proposals must have met one of the previous four criteria to be assessed against criterion 5 (value for biodiversity and nature conservation). Other Open Land of Townscape Importance (OOLTI) is a land use designation so a parcel of land should be designated on this basis primarily, before land is additionally designated on a biodiversity and nature conservation basis. Biodiversity and nature conservation are of course important to the Council and measures are set out in policies within the draft Local Plan to protect not only sites designated for their biodiversity and nature conservation value, but also those sites that contribute towards the boroughs green and blue infrastructure network, including OOLTI.
941	Peter Eaton	Section 21 Policy 36 - Other Open Land of Townscape Importance (OOLTI) Clause 21.25 - pg 247	<p>The previous iteration of the Local Plan - now active - included a clause to permit in exceptional cases the development of OOLTI land and applied a clause dealing with re-provisioning in terms of new open space, equivalent or improved in terms of quantum, quality and openness.</p> <p>I would wish to see the definition of quantum and openness defined far more precisely and not left to arbitrary interpretation. An existing OOLTI space of say one large block of land of 1.0Ha is NOT re-provisioned by equivalent or improved new open space if this is composed of say 5-10 new spaces of 0.2 - 0.1Ha. This could never be interpreted as equivalent of indeed improved and would also not pass the test in terms of openness. Even if the new spaces were of high quality they could never act as replacement in terms of quantum/openness to a larger open space of 100m x 100m say (1.0Ha). Over the borough of Richmond there are many high quality open spaces but only a few have been assessed and designated as OOLTI.</p> <p>In relation to the quantum the following definition should be applied, or some such similar wording – <i>'Quantum is defined as new open space of broadly equivalent proportions to the existing OOLTI space'</i>.</p> <p>In terms of openness the same principles must apply. A large single space of say 1.0ha, however configured, cannot be considered to have been reasonably re-provisioned by a series of smaller spaces. Again the definition of 'openness' ought to be better defined to avoid mis-interpretation.</p> <p>The Council's allocation of OOLTI in the borough has been guided by specialist consultant advice and the council's own specialist officers in terms of planning, conservation and landscape. It is vital therefore that the concept of replacement or re-provisioning is far more tightly controlled with suitable and measurable definition.</p> <p>Furthermore, if OOLTI land is to be re-provisioned as part of some exceptional case, and/or comprehensive re-development for major schemes or regeneration proposals, then the timing of such re-provisioning should be controlled. It would be unacceptable to say lose an OOLTI space in an early phase of a long-running major scheme only to be re-placed in the last phases - no matter how enhanced any new space may eventually become. This should not be left to a Section 106 Agreement Clause but should be defined in Policy 36 itself with wording such as –</p>	The Council have retained the policy wording for OOLTI from the currently adopted Local Plan except for a couple of additions to take account of Permitted Development Rights and the possibility of Biodiversity Net Gain. It is not possible to define openness or quantum any further and both aspects will remain context specific and a matter of planning judgement for the planning authority as and when proposed development arises.

			<p><i>'Any re-provisioned OOLTI space should be provided as early as possible in the initial phase of any major scheme or re-generation project'</i></p> <p>Wording should be added to Clause 21.25 or new clauses added to define quantum, openness and timing of delivery far more specifically for such important elements of the boroughs character and attributes. Richmond's green open spaces are voted by the public as one of its primary attributes and ought to be appropriately protected.</p>	
942	Tim Catchpole, Mortlake with East Sheen Society	Policy 36. Other Open Land of Townscape Importance (OOLTI)	No comment but, as mentioned elsewhere, we are concerned about the re-provision of the OOLTI on the Brewery site as we question the quality, character and biodiversity of the re-provisioned space.	Noted. See response to comment 941 dealing with the principle of re-provision of OOLTI.
-	James Stevens, Home Builders Federation (HBF)	Other Open Land of Townscape Importance (OOLTI) site specific designations	[See comment 746 relating to OOTI and sites 57 and 59]	See response to comment 746. Sites 57 and 59 were identified as weakly performing. Site 57: York House is part of the York House Registered Park & Garden, and would not be suitable for a housing allocation. The duplicate OOLTI designation at Site 59: Harlequins Site which includes land with apartment blocks has been removed. Overall, the Council has an identified future housing land supply, so housing delivery from OOLTI is not needed to meet the borough's housing target.
943	Joan Gibson	Page 246 (relevant to proposed site-specific OOLTI designation)	<p>I really support our green at Ellerman avenue receiving protection by becoming OOLTI. Thank you for this - more of our small greens could do with OOLTI status.</p> <p>Things do change in the time it takes to update the local plan, and we "Friends of Heathfield Recreation Ground and Environs" along with about 12 local volunteers recieved funding from LBRuT's Local fund to "wild" up Ellerman Green last year. In our first year we have managed to transform it from a bit of short grass with a few trees which very few people visited to a wildlife rich area which attracts a significant amount of use as people visit and walk over what is a more interesting area.</p>  <p>The extra protection just any designation brings with it is more than welcome as we continue our work on the green.</p>	Support noted.
-		Policy 37. Public open space, play, sport and recreation		
944	Theresa Oddelm, The Royal Parks	Policy 37 Public Open Space, Play, Sport and Recreation	We welcome the inclusion of this policy as it states that public open space, such as Bushy and Richmond Parks, will be protected. We also welcome the provision of new open spaces as part of development which could mitigate potential increases in visitor numbers to existing parks (including the Royal Parks).	Support noted.
945	Laura Hutson, Sport England	General in relation to evidence base for sport	<p>Please see our updated guidance on planning for sport. https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport?section=planning_for_sport_guidance</p> <p>I am aware that Richmond developed and adopted a Playing Pitch Strategy in 2015. While this is considered to be a robust evidence base for sport, it is important that it is kept up to date. I am aware that Richmond is considering updating this document in due course and would be very supportive of this.</p> <p>Uniting the Movement Our new Strategy 'Uniting The Movement' is a 10-year vision to transform lives and communities through sport and physical activity. We believe sport and physical activity has a big role to play in improving the physical and mental health of the nation, supporting the economy, reconnecting communities and rebuilding a stronger society for all. We will be a catalyst for change and join forces on issues which includes connecting communities, connecting with Health and Wellbeing and Active Environments. The new strategy can be downloaded from our website here The strategy seeks to;</p> <p>Connect Communities We want more communities to enjoy the benefits of what sport and physical activity can do, both for individuals and the place where they live and work. Those benefits will come from a more bottom-up approach, working with – not doing things to – communities, and helping those affected to play a role in what happens in their neighbourhood and how it gets done. Active communities can be a powerful tool in building great places to live.</p> <p>Connect with Health and Wellbeing.</p>	<p>The Playing Pitch and Outdoor Sports Assessment and Playing Pitch and Outdoor Sports Strategy (PPS) are underway, being prepared with input from Sport England, and is due to be completed in 2023. The supporting text has been updated to refer to progress on the evidence base.</p> <p>Note the support for the design-led approach to active environments and the aspirations of the Plan aligning with Sport England's objectives. Paragraph 21.30 in the draft Local Plan gives particular emphasis on physical activity and active travel connected with leisure and fitness, linked with Living Locally. Policy 51. Health and Wellbeing also refers to Active Design. It is considered appropriate to add references in the supporting text to the Richmond Public Health Physical Activity Plan 2021-2031 and a reference to Sport England's Active Design guidance.</p>

			<p>We know that there are many organisations working to improve health and wellbeing, from the NHS to those in the voluntary and community sector, local authorities, employers and the commercial health and wellbeing sector.</p> <p>The strategy creates a potential to improve existing connections and explore new areas to help strengthen people's health and wellbeing, from childhood right through to older age.</p> <p>Active Environments</p> <p>Sport England considers that the planning system plays a vital role in shaping our built environment and that can play a big part in the movement of people and getting people active. Modern-day life can make us inactive, and about a third of adults in England don't do the recommended amount of weekly exercise, but the design of where we live and work can play a vital role in keeping us active. I note that Lewisham has committed to promoting inclusive and liveable neighbourhoods; helping people to move and be active is considered to be a large part of this. I also note that a design-led approach is promoted.</p> <p>We want to make the choice to be active easier and more appealing for everyone, whether that's how we choose to move around our local neighbourhood or a dedicated facility for a sport or activity.</p> <p>As part of Sport England's drive to create an active environment, we promote Active Design through all planning activity. Active Design is Sport England's contribution to the wider debate on developing healthy communities. Active Design is rooted in Sport England's aims and objectives to promote the role of sport and physical activity in creating healthy and sustainable communities. Active Design wraps together the planning and considerations that should be made when designing the places and spaces we live in. It's about designing and adapting where we live to encourage activity in our everyday lives, making the active choice the easy choice. Sport England has produced design guidance on 'Active Design' that can be downloaded from the website here. As noted above, the aspirations of the Local Plan appear very much in line with Active Design principles and Sport England would welcome a reference to its Active Design guidance within this document..</p>	
946	Laura Hutson, Sport England	Policy 37. Public open space, play, sport and recreation	I note that policy 37 has additional text worded to be in line with the London Plan and the NPPF to make the protection for sport and recreation facilities clear. Sport England is fully supportive of this as it provides a good level of protection for playing fields and sports facilities. I note that there is a requirement for early engagement with Sport England for development affecting playing field and this is welcomed. Sport England also welcomes the aspiration to secure community use agreements in order to ensure that private sports facilities meet the wider needs of the community.	Support noted.
947	Laura Hutson, Sport England	General in relation to future site allocations	With regard to any future site allocations, we would advise that the allocation of sites for sports facilities should be identified through the use of a robust and up to date evidence base such as the Richmond Playing Pitch Strategy. The NPPF states that it is important to ensure that the right facilities are in the right place. It is also essential that where sites adjacent to playing fields are proposed to be redeveloped that the new use does not prejudice the use of the playing field (for example, due to ball strike. I note that Richmond Local Plan aspires to have open space delivered as part of housing developments in Policy 37 and this is mentioned in several site allocations. Sport England would request that, particularly in the case of major developments, the evidence base for sport is used to determine whether the provision of sports facilities on site may also be appropriate.	The Richmond Playing Pitch Strategy is currently being updated and is expected to be finalised in 2023. The policy requires applications to refer to the latest Strategy to ensure that adequate sporting provision is developed across the Borough. A reference is also added in the supporting text to the Stage E Action Plan updates to ensure future proposals will have regard to the latest position.
948	Gary Backler, Friends of the River Crane Environment (FORCE)	Policy 37. Public open space, play, sport and recreation	<p>FORCE is strongly in favour of investing to improve underutilised open spaces for public and environmental benefit, rather than taking their underutilisation as a cue to build on them. We also support improvement to those spaces which are at risk of excessive wear-and-tear from new residential developments. At a basic level, the frequency with which litterbins are emptied needs to be increased, especially after weekends, where footfall has increased. Where play space is provided within the curtilage of private developments, we support the "expectation for play spaces to be made publicly accessible." (21.29) It is important that on-site facilities are adequately maintained.</p> <p>We have found that parts of the Council are reluctant to take on the responsibility for new green and open spaces when these might be available as a planning gain or through the review of its own estate. We consider this to be a missed opportunity for significant public benefit and would note that the new Twickenham Junction Rough public space has provided a major public benefit to many local residents. As the population grows and the benefits of local open space are better understood, then the need for and value of new spaces becomes greater. We propose a specific policy in the Local Plan which encourages the Council to identify and take the opportunities for new public open spaces as part of discussions with landowners and in the review of its own land holdings.</p>	<p>Policy 37 explicitly requires new major developments to provide additional open space, as well as improving existing space where there is inadequate existing provision or limited access to such facilities. The Council has also undertaken an Open Space Assessment, updated in 2023, which has identified lower quality sites that may benefit from investment, and the Council is continually undertaking improvements with policies and plans to maintain these facilities and increase standards.</p> <p>The Council has taken on sites in recent years including Twickenham Rough and Jubilee Meadow, as reflected in the updated evidence base, however there has to be a cost-benefit analysis where it can be demonstrated on a case by case basis that significant value could be added. There are mechanisms through the use of planning conditions and obligations for the Council to ensure sites are managed appropriately.</p> <p>Comments regarding the emptying of litterbins are noted.</p>
949	Tim Catchpole, Mortlake with East Sheen Society	Policy 37. Public open space, play, sport and recreation	No comment.	Noted.
950	Nina Miles, GLA on behalf of Mayor of London	Policy 37. Public open space, play, sport and recreation	<p>We support the references to children and young people's play facilities in policy 37 and are pleased to note the reference to the GLA's child yield calculator, the LP2021 benchmark of 10 sqm per child and the Mayor's Shaping Neighbourhoods: Play and Informal Recreation SPG. The supporting text in paragraph 21.27 sets clear criteria for the loss of facilities and perhaps should be embedded within the policy.</p> <p>Policy S4 LP2021 notes the importance of informal recreation and paragraph 5.4.2 highlights the current lack of opportunities for children to play in their local neighbourhood. A recognition of informal play as well as formal play spaces within Richmond's policies would be welcome. This is also connected to the Healthy Streets Approach.</p>	<p>The supporting text in the Reg 18 Plan at paragraph 21.27 has been imbedded into the policy as a new criteria paragraph B.</p> <p>The supporting text in the Reg 18 Plan at paragraph 21.43 references informal play. The policy itself does not explicitly mention formal or informal play spaces/facilities and thus can be applied in either circumstance.</p>
951	Nick Alston, Avison Young on behalf of St George Plc and Marks & Spencer	Policy 37 Public Open Space	<p>Recommended Amendments and Explanation</p> <p>As currently drafted the policy isn't fully evidenced to be properly justified. However, the stated intention to prepare further evidence to update the Public Open Space deficiency maps should address this.</p> <p>We would welcome the opportunity to input into this evidence gathering work and reserve the opportunity to make further representations on the draft policy once this evidence is published.</p>	The Council has undertaken an updated Open Space Assessment that has informed the policy. This evidence base is published alongside the Regulation 19 version of the plan and the Council welcome comments.

952	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	Policy 37. Public open space, play, sport and recreation	No change proposed.	Noted.
953	Mark Jopling, Udney Park Playing Fields Trust	Udney Park Playing Fields	In 21.28 we note that the Playing Pitch Strategy will be updated in 2022. It is essential that Udney Park retains the status granted in the current Local Plan as a "strategic site" in the provision of playing field capacity at this end of the Borough, many local sports clubs are limiting membership and playing homes games out of Borough, in LBRUT demand for playing fields exceeds supply so it essential that all playing field capacity, and potential playing field capacity, is protected irrespective of site ownership.	The Council is currently preparing a Playing Pitch Strategy that will assess all facilities in the borough. The policy and the supporting text carry a clear commitment to retain outdoor sports facilities against loss, regardless of ownership. The supporting text has been updated to refer to progress on the evidence base, including the emerging picture that demand is increasing in a number of sports; Stage E Action Plan updates are also referred to so that future proposals will have regard to the latest evidence base. The January 2022 PPS Action Plan Update notes the former provision at Udney Park Playing Fields and the recommended actions for the site; this Update has informed the updated Playing Pitch Assessment and Strategy.
954	Peter Willan and Paul Velluet, Old Deer Park Working Group	General comment (in relation to culture)	We understand the Council expect to undertake a further Sports Review in 2022.	The Council has developed an update to the Richmond Playing Pitch Strategy.
955	Peter Willan and Paul Velluet, Old Deer Park Working Group	Policy 37. Public open space, play, sport and recreation	No change proposed.	Noted.
956	Alice Roberts, CPRE London	Paragraph 21.31 (in relation to public open space)	<u>21.31 seeks to improve the provision of public open space.</u> We therefore suggest that the area of land at Heathfield Recreation Ground, which was proposed for a site for a school should be added back in and given protected status. More needs to be done to turn 'grey space' (roads and space given to parking) to green space or community open space.	The Council intend to redesignate this area of land at Heathfield Recreation Ground as public open space. This will be reflected on the updated Policies Map. Comments regarding the redevelopment of 'grey space' is noted and the Council will consider opportunities to increase green space in these circumstances, particularly in areas of deficiency, although often led by whether there is space in highways/footways.
957	Jon Rowles	Paragraph 21.31	21.31 seeks to improve the provision of public open space. A portion of Heathfield Recreation Ground was taken out of the POS designation to allow for the redevelopment of Heathfield School and to provide a secondary school in the early 2000s. Now that this development is not going ahead I feel that the POS removal should be reversed and that the new Heathfield Recreation Ground extension should have POS designation applied to it.	Update the Policies Map to redesignate the portion of land at Heathfield Recreation Ground as public open space.
958	Alice Roberts, CPRE London	General Comment (in relation to creating new parks)	However, we believe the Council could demonstrate greater ambition for increasing the amount of green space in Richmond. For example, new parks could be created in areas of the borough with not enough green space by converting 'grey space' into 'streetparks'.	Comments regarding the redevelopment of 'grey space' is noted and the Council will consider opportunities to increase green space in these circumstances. See also response to comment 956.
959	Philip Briggs, Richmond Bat Species Action Plan Steering Group	p.252, paragraph 21.32	"...Regardless of the type of open space provision, it should be designed with nature conservation and biodiversity benefits in mind, thereby delivering biodiversity net gain and addressing the requirements of Policy 39 of this plan." It's really good to see this. Please could something be added about the importance of avoiding artificial lighting in order to provide dark corridors?	External lighting including artificial lighting will be assessed under Policy 43. The Plan does not identify any 'dark corridors' as it is not considered practicable. There is no policy requirement coming from within the NPPF or the London Plan, there are other protective designations for open space and biodiversity, and furthermore it would generally be difficult to achieve in urban environments. There may be opportunities to maintain dark night-time corridors/refuges where they exist, and in line with the priorities in the Local Plan and the Biodiversity Action Plan limit the impact of lighting in wildlife and ecological corridors. See response to comment 1004.
-		Policy 38. Urban Greening		
960	Katy Wiseman, National Trust	Policy 38. Urban Greening	The National Trust supports Policy 38 Urban Greening which requires all development proposals to integrate green infrastructure into their development. In recent times it has become clear that urban greenspace and nature has a proven impact on people's physical health and wellbeing. Biodiverse and attractive green space is important for the wellbeing of local people as well as providing environmental benefits such as urban cooling, flood mitigation and improved air quality. The National Trust recently commissioned a review of urban greenspace across the UK which showed a huge surge in people's use of green spaces during the pandemic and revealed inequality of access to nature in many urban neighbourhoods. The research undertaken by Vivid Economics makes a strong economic case for significant investment across to the UK for introducing green spaces into some of the greyest urban communities over the next five year, and the National Trust and partners are lobbying government to make a commitment to fund urban green infrastructure to level up access to green space as part of the governments 'infrastructure revolution'. Although the research focuses on funding more strategic green infrastructure such as greening urban streets, upgrading poor quality parks, creating large recreational parks and forests, the Trust recognises that most of the new development in the Richmond Borough will be small and cumulatively they can have a significant impact on greening the Borough to be benefit of people and nature. We support policy criterion D. which requires the greening elements to focus on tackling the climate emergency and/or help avoid or mitigate the impacts of the proposed development on biodiversity and welcome policy wording that refers to the need for locally relevant greening as this will add to the identity and connect to the local area, as well as increase opportunities to complement the site's existing wildlife value. http://www.bartonwillmore.co.uk/BartonWillmore/media/Main/news/news/2020/Greenkeeper/Greenkeeper-Report-for-FPA-Greening-Programme-July-2020-2.pdf	Support noted.

961	Jon Rowles	Policy 38. Urban Greening	<p>Only 'major' developments need to do calculations – the requirement should prob be moved down the scale to something like 5 units or over.</p> <p>All sites should contribute to the greening of streets or local areas they are located in. Such as contributing to tarmac being removed and green verges put in tree planting or improvements to local parks.</p> <p>Most developers want to install a modular shallow green roof with sedum, so could be tightened up and made clearer what is needed; biodiverse green roofs. Hard to change at the last minute (that is the excuse often given) a good green roof is quite heavy and needs more steelwork in the roof to hold it up.</p> <p>Current design guidance for roof design for houses favours pitches roofs so this may need to be altered so that more green roofs can be constructed – maybe false pitch at the front to conserve roofscape at the front, but flat roof behind and this will also reduce water runoff rates.</p>	<p>In relation to the first point, policy 38 already goes beyond what the London Plan advocates for urban greening in Policy G5, which only discusses major development proposals (10 or more residential units) delivering urban greening on site. Policy 38 requires all development to deliver urban greening, however it is the Urban Greening Factor set out in the London Plan that is not required for developments of 9 residential units or fewer and this is consistent with the London Plan. No change to the plan based on this comment has been made. It should be noted however that the draft Local Plan goes further than national policy in recommending a minimum 20% biodiversity net gain on all development proposals that result in 1 unit or more, in addition to other development proposals. This will help to improve the urban greening offer within the borough.</p> <p>In response to the second point on all sites contributing to the greening of streets or local areas, the Council is confident that this policy, supported by the London Plan and national policy, will do this. It should be noted that the National Planning Policy Framework 2021, paragraph 131, introduced the requirement for all new streets to be tree-lined and that opportunities are taken for trees to be introduced to other areas of the development.</p> <p>In response to the point regarding green roofs, extensive roofs are supported as they provide a visual and biodiversity interest, whilst requiring low maintenance including little or no irrigation requirement. In addition, the draft Plan already states that biodiversity-based extensive green roofs are the Council's clear priority in terms of green roof provision as these will play a more effective role in helping to tackle the climate emergency and help support biodiversity. No change is therefore proposed to the policy.</p> <p>In relation to the point regarding roof design, development in general needs to have a relationship with neighbouring buildings with regards to building design and proportions used as set out in paragraph 20.11, but in areas away from areas of a certain character or design, variations to the general roof line may be acceptable as set out in paragraph 20.12, and in this scenario green roofs will be considered in line with Policy 38. No change is therefore proposed to the policy.</p>
962	Tim Catchpole, Mortlake with East Sheen Society	Policy 38. Urban Greening	No comment.	Noted.
963	Nick Alston, Avison Young on behalf of St George Plc and Marks & Spencer	Policy 38 Urban Greening	<p>Recommended Amendments and Explanation</p> <p>We recommend the following amendments to Part E of the policy</p> <p>'Extensive green or brown roofs should be incorporated into developments with roof plate areas of 100sqm or more, where technically feasible. As much as reasonably possible of any potential roof plate area should be used as biodiversity-based extensive green or brown roof.'</p> <p>We support the ambition of the policy however, there is no evidence to properly justify the 70% requirement which in practice would limit space needed for residential rooftop amenity, space for plant/services and maintenance, and is therefore likely to be too restrictive. The recommended amendments would ensure that the policy was capable of being effective.</p>	<p>It is considered that extensive green roofs can include planting of a brown nature, such as sedum or moss, so this proposed change is not considered necessary.</p> <p>In relation to the point regarding the 'roof plate area', it is considered that a requirement of 70% is reasonable and necessary to maintain and support the green infrastructure network that is important in linking built up areas to larger open space areas, for reasons set out in Policy 34. The requirement for 70% coverage is a long-standing policy requirement, first introduced in this borough in 2011, when it was based on a technical report produced by the Greater London Authority that supported the then London Plan. This requirement is still considered to be appropriate, and it is not too restrictive. It is consistent with the Council's adopted policies, and it meets our aspirations for improving the green infrastructure network and biodiversity in the borough as well as contributing to tackling the climate crisis.</p>
-	Policy 39. Biodiversity and Geodiversity			
964	K Peachey	21 Increasing biodiversity and the quality of our green and blue spaces, and greening the borough	<p>Para 21: I fully support increasing biodiversity and greening the borough and I am delighted to see the initiatives in the local plan to support this.</p> <p>Building on greenfield sites tends to offer the most profit and therefore are more attractive to developers. Trees, hedgerows, wildlife are more likely to be cleared around the time of a land sale with the resulting destruction of complex mature habitats. Tenants on the site may also be unaware of actions which undermine the local ecosystems. As now with carbon chains, I think there needs to be more lifecycle responsibility for green sites, so that initiatives to retain and enhance biodiversity are monitored beyond the initial approved development plan.</p> <p>The Council appears to have very limited powers in preventing destruction of existing habitats outside of planning submissions, even in designated green space and often only becomes aware of habitat destruction when it is too late.</p> <p>Developers demonstrating an environmental conscience should be welcomed and responsibility should be with site owners to provide evidence that their ongoing maintenance plans will and do encourage different plant or animal species. They should budget to demonstrate what impact the development has had on existing species and their populations during and after the</p>	<p>In relation to the point on monitoring, planning permissions for major development are subjected to conditions around management, maintenance and monitoring of urban greening and biodiversity enhancements. Land sue designations, such as Sites of Importance for Nature Conservation (SINCs), exist to ensure that development does not unreasonably impact on green open spaces that the borough seeks to protect. No changes made to the policy.</p> <p>In relation to the point on green roofs, it will not be sufficient for a development to rely on this intervention alone to deliver urban greening and biodiversity net gain. Mature complex habitats such as Ancient Woodland are protected within the draft Local Plan – see Policy 42. No changes made to the policy.</p>

			<p>development, in order to improve future planning decisions. This will be a more positive approach than trying to prove a development will not impact existing diversity.</p> <p>Green roofs and walls should be viewed as additional measures to support biodiversity rather than replacements for existing biodiversity in developments. New habitats are not usually a valid replacement for mature complex habitats both above and below ground.</p> <p>Additionally, local opposition to measures which may have a deleterious impact on biodiversity are less likely to succeed in areas where there is little finance to hire experienced planning barristers, such as used by experienced development companies. I would welcome any funding to be provided by development companies to ensure adequate representation of local opposition (similar in the way party wall agreements and disputes are funded by the property owner wishing to build on the party wall).</p>	In relation to the final point, noted. No changes made to the policy.
965	K Peachey	Para 21: Policy 39 B3	<p>Policy 39 B 3: Delivering offsite biodiversity value is likely to favour profit over biodiversity since it will be difficult to predict the impact on other ecosystems connected to the existing site. I therefore propose this is removed as an option.</p>	<p>Sites of Importance for Nature Conservation (SINCs) are designated according to their value on a metropolitan, borough or local basis. The mitigation hierarchy for a SINC is a requirement set out in the London Plan Policy G6. The draft Local Plan must conform to regional and national planning policy. The policy already contains reference to the London Plan in this regard, therefore, no changes are proposed in this regard.</p>
966	Katarina Hagstrom	Policy 39: Biodiversity and Geodiversity – Part B	<p>Context:</p> <p>(1) This paragraph clarifies that protection of species and habitats extends beyond designated sites. This principle is in line with the objective to Protect Biodiversity; and should be maintained.</p> <p>(2) The paragraph clarifies that, for important sites, the most significant ecological features should be protected and the impact of development minimised. These principles are appropriate – but ONLY if harm cannot be avoided.</p> <p>(3) The source of the wording used in Policy 39 part B of the Draft Plan would appear to be the London Plan 2021, policy G6, point C. However, the London Plan provides <u>specific context</u> for this wording: A “<u>Sites of Importance for Nature Conservation (SINCs) should be protected.</u>” C “<u>Where harm to a SINC is unavoidable, and where the benefits of the development proposal clearly outweigh the impacts on biodiversity, the following mitigation hierarchy should apply to minimise development impacts: ...</u>” (emphasis added)</p> <p>Concerns:</p> <p>(a) Policy 39 part B (from “development proposals shall...”): appears to apply lesser obligations on Protecting Biodiversity than National and London Policy and guidance*.</p> <p>(b) The Policy 39 part B wording of the points 1-3 (mitigation hierarchy principles): appear to narrow the application of the mitigation hierarchy versus its application elsewhere in planning guidance**.</p> <p>(c) The Policy (from “development proposals shall...” – as currently worded – appears to be inconsistent with the Objectives and Principles of the Draft Local Plan itself. Ecology – and protecting biodiversity – depends on complex integrated systems, requiring the protection of whole ecosystems and ecological networks. An apparently ‘less significant’ feature may nevertheless play a vital role in the sustainability of the ecosystem - and the viability of the species within it.</p> <p>Suggestions:</p> <p>(i) Maintain the explicit application of this guidance beyond ‘designated’ SINC sites. This is appropriate as the obligation to Protect Biodiversity applies even if a site has not been designated.</p> <p>(ii) Make explicit the requirement to, firstly, and wherever possible, Avoid Harm. I.e. clear context – as per the London Plan 2021, policy G6 A and C – should be added.</p> <p>(iii) Even with clear contextual clarification on the mitigation hierarchy as defined here, NPPF 2021 180** must still be fully taken into account. I cannot assess whether this specifically needs to be noted in the Draft Local Plan.</p> <p>It might, however, be helpful to provide explicit clarity on the requirement for <u>adequate</u> mitigation / compensation (ie to avoid the impact of the specific harm caused) <u>without which planning permission should be refused</u>.</p> <p>Specifically, adequate mitigation(/ compensation) is not the same thing as simply achieving Biodiversity Net Gain: “<i>Biodiversity net gain complements and works with the biodiversity mitigation hierarchy set out in NPPF... It does not override the protection for designated sites, protected or priority species and irreplaceable or priority habitats set out in the NPPF. Local planning authorities need to ensure that habitat improvement will be a genuine additional benefit, and go further than measures already required to implement a compensation strategy.</i>” (Ref: Natural Environment guidance, Paragraph: 024 Reference ID: 8-024-20190721, Revision date: 21 07 2019)</p> <p>Footnotes:</p> <p>*NPPF 2021 #174, #175, #179, #180, NE & DEFRA ‘Protected Species and Development’ Guidance (2022), and Dept & Ministry for Levelling Up, Housing and Communities ‘Natural Environment’ Guidance (2019).</p> <p>**NPPF 2021 180: “<i>When determining planning applications, local planning authorities should apply the following principles: a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), <u>adequately</u> mitigated, or, as a last resort, compensated for, <u>then planning permission should be refused</u>.” (emphasis added).</i></p>	<p>In relation to point i), the Council has now added to Policy 39 part B and part C additional mitigation hierarchy requirements for applicants to follow for where SINC sites as well as other habitat sites are impacted by development.</p> <p>In relation to point ii), this is agreed. The Council has added a sentence to Policy 39 part B that reflects the London Plan Policy G6 part C by saying; “...and where the benefits of the development proposal clearly outweigh the impacts on biodiversity”.</p> <p>In relation to point iii), the Council considers that paragraph 180 of the NPPF is accurately reflected within the draft Local Plan. In terms of setting out explicitly what adequate mitigation of compensation may entail, this will differ on a case by case basis and is therefore an aspect that an applicant will need to provide based on the proposal that they put forward for consideration. A SINCs value will always be considered in any land use planning decision that the Council makes.</p> <p>In relation to point 3, Policy 39 part 1 states that SINCs are one of the designated sites for biodiversity and nature conservation that should be protected. We will amend part B of Policy 39 to read; “Where development would impact on species or a habitat, especially where identified in the Richmond Biodiversity Action Plan (BAP) at London or local level, or the Biodiversity Strategy for England, and where the benefits of the development proposal clearly outweigh the impacts on biodiversity, development proposals shall demonstrate that the mitigation hierarchy, as set out in London Plan Policy G6, has been followed sequentially in accordance with the principles of...”</p>
967	Theresa Oddelm, The Royal Parks	Policy 39 Biodiversity and Geodiversity	<p>We welcome this policy given the SSSI designation of both Richmond and Bushy Parks and the National Nature Reserve and SAC designation of Richmond Park.</p>	Noted.

968	Theresa Oddelm, The Royal Parks	Policy 39 Biodiversity and Geodiversity– comments specific to biodiversity and the Royal Parks’ Environmental Designations	We welcome this policy and the protection and opportunities it offers for enhancement of designated sites and green corridors. Comments regarding proposed SINC extensions are provided further below.[See Comment 1131 under Appendix 4]	Noted.
969	Gary Backler, Friends of the River Crane Environment (FORCE)	Policy 39. Biodiversity and geodiversity; and Appendix 4	We welcome LBRuT’s commitment “to protect and enhance the borough’s biodiversity and geodiversity,” including its commitment to “protecting ecological or wildlife corridors from development which may destroy, impair or harm the integrity of the corridor”. We particularly favour an approach that starts by recognising the biodiversity potential of a site rather than its current biodiversity status as the relevant baseline from which to evaluate genuine biodiversity net gain, and trust that this approach will inform the upcoming biodiversity net gain SPD. [See comment 1130 in relation to site specific SINCS] We trust that the new SINCS will be implemented whether or not the borough’s population continues to increase as forecast. The new SINCS will make an important contribution to countering the Climate Emergency and improving the physical and mental health of the existing resident base.	With regards to the first paragraph, biodiversity net gain will be calculated using the site’s ecological potential in accordance with the Environment Act. There is however the possibility of requiring a site, such as an urban site, to deliver BNG as a previously agreed number of biodiversity credits rather than a percentage (to account for minimal biodiversity present) whilst compensation can be sought if biodiversity degradation occurs prior to any ecological surveys on site. The second point is noted.
970	Tim Catchpole, Mortlake with East Sheen Society	Policy 39. Biodiversity and Geodiversity	There is very little mention here of geodiversity. There is a proposal to include the landforms and Pleistocene deposits of Richmond Park into a new Geodiversity area. In the annals of The Geological Society of London, a lecture titled The Thames Through Time, a Burlington House lecture, held at the Geological Society on 20 September 2011, it is reported: “the river has laid down a stacked ‘staircase’ of terrace sediments that form one of the most important archives of Pleistocene environmental change anywhere in the world.”	The Council has drafted this part of the policy in line with the London Plan and its Policy G9 ‘Geodiversity’. There is no need to repeat London Plan policy within the Local Plan. Therefore, the Council considers the policy to adequately reflect the current level of protection required for geodiversity in the borough, however the supporting text will be amended at paragraph 21.22 to correctly state that Richmond Park is designated as a Locally Important Geodiversity Site (LIGS). The Council will amend the paragraph to read; “In line with London Plan Policy G9, there are currently no regionally important geological sites identified in Richmond borough, however Richmond Park is designated as a locally important geological sites identified in Richmond borough.”
971	Ziyad Thomas, Planning Issues Ltd on behalf of Churchill Retirement Living and McCarthy Stone	Policy 39. Biodiversity and Geodiversity	The Council’s commitment towards new development towards Biodiversity Net Gain. The requirement for 20% Biodiversity Net Gain goes beyond the requirements in Government legislation or the policies of the London Plan (Policy G6 Biodiversity and access to nature) We note that the Regulation Consultation has not included a Whole Plan Viability Assessment as part of the published evidence base. We would respectfully remind the Council that the PPG states that “The role for viability assessment is primarily at the plan making stage. Viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan” (Paragraph: 002 Reference ID: 10-002-20190509). The cost of biodiversity net gain must be robustly allowed for in the forthcoming Local Plan Viability Assessment. Presently the policy is not ‘justified’ by a proportionate level of evidence and the proposed policy is unsound as a consequence.	With regards to the first point, BNG of 10% is the mandatory requirement set by the Environment Act, however it is not a cap and LPAs are able to explore a higher percentage requirement within Local Plan policy. The Council are finalising a Viability Assessment report that will be consulted on alongside the Regulation 19 consultation later in 2023 – this report includes an appraisal of the requirement for 20% BNG delivery.
972	Michael Atkins, Port of London Authority (PLA)	Policy 39. Biodiversity and Geodiversity	Welcome reference in part A4 to the need for development to deliver robust and measurable net gains for biodiversity by incorporating and/or creating new habitats or biodiversity features, and part 5 which requires development proposals to provide at least a minimum of 20% contribution towards delivering measurable Biodiversity Net Gain (BNG). As part of this it should be noted as part of the policy that net gains in biodiversity can also be achieved in and alongside riverside areas as well on land. Noted in supporting text 21.79 that the Council will produce further planning guidance in the form of a SPD on biodiversity, specifically on biodiversity net gain, and set out for applicants and developers how biodiversity net gain can be delivered on a variety of sites, ranging from major to small-scale proposals. The PLA requests to be consulted on the proposed SPD when available. Necessary changes: Policy 39 should include the following amendment to part A4 "requiring development to deliver robust and measurable net gains for biodiversity by incorporating and/or creating new habitats or biodiversity features, such as expansion and improvement of habitats, green 'and blue' links or habitat restoration, incorporation of green roofs and walls, tree planting as well as micro-habitat features such as bird and bat bricks and boxes, hedgehog gates or wildlife ponds in line with other policies of this Plan"	Agreed. The Council will make the following change to Policy 39 part A4 so that it reads; "requiring development to deliver robust and measurable net gains for biodiversity by incorporating and/or creating new habitats or biodiversity features, such as expansion and improvement of habitats, green and blue links or habitat restoration, incorporation of green roofs and walls, tree planting as well as micro-habitat features such as bird and bat bricks and boxes, hedgehog gates or wildlife ponds in line with other policies of this Plan." With regards to the point on consultation of the forthcoming Biodiversity SPD, this is noted.
973	Katy Wiseman, National Trust	Policy 39 Biodiversity and Geodiversity	The Trust supports proposed Policy 39 which seeks to protect and enhance the borough’s biodiversity and geodiversity. Everything must be done to prevent the decline in biodiversity currently being experienced across the Earth due to human activity such as land-use change, pollution, over consumption of natural resources and climate change. The National Trust is committed to creating 25,000 hectares of new wildlife habitats by 2025 which will provide more opportunities for nature and people to connect to nature. The Trust also recognises that it is important that we act and multiple small and local actions that enhance and improve biodiversity add-up. We support criterion A5 which requires development proposals to provide at least a minimum of 20% contribution towards delivering measurable Biodiversity Net Gain (BNG) and appreciate that this target is one of the more ambitious currently set within the Region. We also support criterion C which positively supports proposals that will reduce deficiencies in access to nature and green space. This policy aligns with our values and paragraph 174 of the NPPF.	Noted.
-	Anna Stott, WSP on behalf of Sainsbury’s	Policy 39. Biodiversity and Geodiversity, Site Allocation 5: Carpark for Sainsburys, Uxbridge Road, Hampton	[See comment 299 against Site Allocation 5 in relation to concerns the BNG requirement will be unfeasible]	N/A
974	George Goodby, Environment Agency	Policy 39. Biodiversity and Geodiversity – General comments in relation to biodiversity overview	We also welcome that Blue-Green Infrastructure, Biodiversity and Rivers are all covered in separate policy sections and that an ambitious policy to achieve 20% net gain on most types of new developments has been set. A third of the Borough’s land is	Noted.

			designated as parkland or green open space and the policies set out in the plan recognise the importance of this to Richmond's unique character.	
-	George Goodby, Environment Agency	Policy 39: Biodiversity and Geodiversity.	See comment 913 for a link to green and blue infrastructure	Noted.
-	George Goodby, Environment Agency	Policy 39: Biodiversity and Geodiversity	See comments 248 and 686 on linking the climate and the biodiversity crises in policy.	Noted.
975	George Goodby, Environment Agency	Policy 39: Biodiversity and Geodiversity.	<p>We are pleased to see the inclusion of an ambitious policy for 20% Biodiversity Net Gain (BNG). This will compliment and build on the requirements for BNG as set out in the Environment Bill, which recently received Royal Assent.</p> <p>Much of the secondary legislation and guidance for BNG is still under consultation before the requirement becomes mandatory in 2023. This includes expanding the metric to include consideration of marine (sub-tidal) biodiversity. Additionally, the details of which types of development will be included in the mandatory BNG requirements are also under consideration through a DEFRA consultation. We would recommend that this policy remains flexible so that it can be applied in conjunction with, and compliment, mandatory net gain requirements.</p> <p>We also note that householder development is included in the Policy's requirement for 20% net gain. Consideration should be given as to whether the DEFRA metric 3.0 is appropriate for calculating this. Natural England have developed a Small Sites Metric which may be applicable. The policy should include a demonstration that the requirements are consistent and proportionate to the size of development proposals and any potential impact on biodiversity.</p> <p>In Point A of the policy, the biodiversity value of rivers should be acknowledged. These are some of the biggest assets in Richmond upon Thames in terms of biodiversity, and opportunities to enhance them should always be sought. Furthermore, the links between biodiversity, climate change, flood risk, and the Water Framework Directive should be made.</p> <p>We feel the clarity of Point A.5 would be improved if it was changed to "provide a measurable 20% net gain for biodiversity, in line with the DEFRA metric 3.0 or latest available version".</p> <p>This Policy should also include a requirement for developers to demonstrate how they have followed the mitigation hierarchy and demonstrate how they have followed BNG good practice principles. We would also refer you to CIEEM's guide Biodiversity Net Gain: Good Practice Principles for Development, A Practical Guide. Box 4.1 of this document outlines best practice for biodiversity net gain policies.</p> <p>The rivers section of the DEFRA Biodiversity metric penalises encroachment within 10m of top of bank, so providing a 10m buffer zone would help sites with a riverine element to achieve 20% net gain. Throughout our response to the plan, we have requested 8m buffer zone from fluvial main rivers in line with our current internal guidance and our permitting regime requirements. However, if this was extended to 10m this would synergise well with the requirement for 20% BNG set out in this policy.</p> <p>We note that the Council intends to publish a Supplementary Planning Document which expands on Biodiversity Net Gain requirements and appreciate that some of our comments on this policy may be explored in more detail in this document. We would be happy to assist in the preparation of this SPD.</p>	<p>With regards to the comment in the first paragraph, this is noted.</p> <p>Agreed. The Council will amend paragraph 21.76 of the supporting text so that it reads; "Whilst this Policy will be developed further as the government's Environment Bill progresses through parliament, it is expected that development will need to comply with the following principles and guidance: The latest and most appropriate DEFRA metric or agreed equivalent should be used to quantify the baseline and post-development biodiversity value of the development site and off-site areas proposed for habitat creation. Natural England's Small Sites Metric will be appropriate for most small-scale householder applications as well as other minor development, whilst the Biodiversity Metric 3.1 (or later versions) should be used for other applications for development. Development proposals should also follow the good practice principles for development set out by CIEEM.</p> <p>The Council considers that the policy is supportive of biodiversity enhancement throughout the borough including rivers. This policy should also be read alongside other policies that consider the natural environment, such as Policy 34. Our strategic objectives link important aspects such as the climate and biodiversity crises.</p> <p>Agreed. We will change Policy 39 Part A5 to read; "requiring the following development proposals to provide at least a minimum of a measurable 20% net gain for biodiversity, in line with the latest available version of the DEFRA metric contribution towards delivering measurable Biodiversity Net Gain (BNG).</p> <p>Part B of the policy requires development proposals to demonstrate that the mitigation hierarchy has been followed sequentially and so it is deemed that this has been sufficiently addressed in the policy. The Council will amend Policy 39 Part 4 to read; "requiring development to deliver robust and measurable net gains for biodiversity in accordance with good practice principles for Biodiversity Net Gain (BNG) by incorporating and/or creating new habitats or biodiversity features..."</p> <p>Inserting a requirement within the policy for a 10m buffer for any development encroaching on the riverine environment may not always be possible due to space constraints. This aspect of Policy 39 will remain the same.</p>
	Louise Cole	Chapter 21: Increasing biodiversity and the quality of our green and blue spaces, and greening the borough Policy 39: Biodiversity and Geodiversity page 257/258, 260, Paragraph 21.66	<p>2. protecting and conserving priority species and habitats that sit outside the nature conservation network of designated sites, including protecting other existing habitats and features of biodiversity value on non-designated sites and promoting opportunities for their enhancement by using the Richmond Biodiversity Action Plan's aim and actions;</p> <p>4. requiring development to deliver robust and measurable net gains for biodiversity by incorporating and/or creating new habitats or biodiversity features, such as expansion and improvement of habitats.'</p> <p>21.66: All development, particularly for new and replacement buildings and extensions to buildings, should utilise opportunities to attract new species to a site. This can include the incorporation of artificial nest boxes and bricks in buildings to provide nesting and roosting opportunities for birds, including species under threat such as swifts, house martins, swallows and house sparrows, and where appropriate, bats. Swift bricks integrated into new buildings are preferred, as these are suitable for multiple bird species. As outlined in the National Planning Practice Guidance, these relatively small features can achieve important benefits for wildlife. Applicants will be expected to provide details of such features as part of planning applications.'</p> <p>COMMENT</p> <p>I welcome these paragraphs for their requirement to provide integrated nest boxes, in accordance with the London Plan and NPPG Natural Environment 2019. In particular I welcome the encouragement for swift bricks as a universal nest brick which benefit a range of birds in addition to swifts.</p> <p>I request that there is a requirement for the nest boxes to be installed in accordance with best practice guidance (see below) with regard to recommended densities (1:1, swift bricks to residential units, and one swift brick per six square metres of facade on commercial buildings):</p> <p>The Chartered Institute of Ecology and Environmental Management Journal, Issue 104, June 2019: https://cieem.net/resource/the-swift-a-bird-you-need-to-help/</p>	It is agreed to include reference to best practice guidance within paragraph 21.66.

977	Mike Priaux, Swifts Local Network: Swifts & Planning Group	Policy 39. Biodiversity and Geodiversity, Paragraphs 21.66 and 21.70	<p>Paragraphs 21.66 & 21.70 (page 260) of draft Local Plan (main document). These paragraphs relating to swift bricks are a welcome implementation of the London Plan (2021) policy G6 item B4. The reference to universal nest bricks is also welcome, representing the latest guidance from NHBC Foundation and CIEEM etc. However, an important omission is that these should be implemented in accordance with best practice. RIBA and CIEEM and the imminent BS 42021 provide general guidance on location and recommend one nest brick per dwelling on average. Brighton & Hove Council for example actually go beyond this requirement, requiring swift nest boxes (to be integral bricks wherever practical) in all new developments that are five metres high or above; e.g. for smaller developments a minimum of three boxes, or two per residential dwelling, or one per 50sqm of commercial floor space, whichever is the greater (https://www.brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/Swift%20Guidance.pdf - pages 2-3).</p> <p>Changes considered necessary: We request that "These features should be implemented in accordance with best practice guidance" is added to the end of paragraph 21.66. Please also add "at a ratio of one nest brick per dwelling on average." to the end of paragraph 21.66. This would reflect current guidance from RIBA (Designing for Biodiversity, 2013), and CIEEM (https://cieem.net/resource/the-swift-a-bird-you-need-to-help/), and the imminent British Standard BS 42021 due for issue on 07/02/22 (https://shop.bsigroup.com/products/bs-42021-integral-nest-boxes-design-and-installation-for-new-developments-specification/standard/preview) (https://standardsdevelopment.bsigroup.com/projects/2017-03102#/section).</p>	Agreed. Changes that reflect the comments have been made to the supporting text of Policy 39.
978	Katarina Hagstrom	Policy 39: Biodiversity and Geodiversity, Paragraph 21.67	<p>Context: The requirement to provide data to GiGL is already a requirement in the current Local Plan. However, it appears that this requirement is largely ignored by developers, despite its promotion as Good Practice (Ref: In Practice, Dec 2010, Where is all the data going?). Furthermore – as far as I understand – the Council has no means of enforcement on this.</p> <p>Suggestions: Inclusion of a specific requirement in this subsection (21.67) that ALL ecological data must be submitted to GiGL at the same time as any ecology survey is submitted – AND that any Planning Application cannot be accepted until this requirement has been fulfilled. This would be fully in line with CIEEM guidance (CIEEM Guidelines for Ecological Report Writing, Second Edition, Dec 2017, paragraph 5.34) which clarifies that the whole dataset should be made available on request.</p>	The supporting text already states that “where ecological surveys and assessments are undertaken, developers should make all ecological data available to Greenspace Information for Greater London (GiGL)...” It is outside of the remit of the Council to <i>require</i> this.
979	Vicky Phillips, Habitats & Heritage	Para 21.67	The Council needs to make it compulsory for developers to lodge with GIGL all data collected during ecological surveys. This should be enforced through planning conditions or in some other way.	The supporting text already states that “where ecological surveys and assessments are undertaken, developers should make all ecological data available to Greenspace Information for Greater London (GiGL)...” It is outside of the remit of the Council to <i>require</i> this.
980	Mike Priaux, Swifts Local Network: Swifts & Planning Group	Policy 39. Biodiversity and Geodiversity, Paragraph 21.67	<p>Paragraphs 21.67 (page 260) of draft Local Plan (main document). This policy and paragraph is welcome but does not clearly consider the impact on buildings-based species of bats and birds.</p> <p>Changes considered necessary: We request that "including buildings-based species" is added to 21.67, i.e. "Where development proposals could affect or harm a European Protected Species or its habitat including buildings-based species..."</p>	This addition is not considered necessary as the paragraph already relates to all species and does not exclude those which are buildings-based. No change required.
981	Clare Snowdon	Paragraph 21.75 in relation to biodiversity net gain	21.75 It's important that biodiversity net gain includes a time factor - both in ensuring that displaced species are displaced to suitable nearby habitat and not eliminated (ie that this is not a "jam tomorrow" approach - reducing populations with the promise of later increasing them). Also that there is a requirement to demonstrate actual net gain over a period of several years, not purely an intention to create net gain, which fails due to poor implementation as seen with tree planting projects, where the trees fail to thrive or the "lip-service" placement of bat boxes	Agreed. Changes made to paragraph 21.76 as a result. See comment 975 above.
982	Philip Briggs, Richmond Bat Species Action Plan Steering Group	Comment in relation to areas of darkness	<p>We would request that there are some specific commitments to retaining and increasing areas of darkness in and around features with known/likely biodiversity value or which have the potential to act as nocturnal wildlife corridors should lighting be reduced or removed. Our recommendations would be to exclude the introduction of street lighting, waymarking lighting on key dark habitats primarily (but not limited to bats) in the following areas including restrictions of light pollution from developments adjacent to the following key nature reserves and habitats:</p> <ul style="list-style-type: none"> Ham Lands Ham Avenues Ham Common Ham Common Woods Petersham Common Terrace Gardens Ham and Petersham towpath Kew towpath The Old Deer Park Barnes Common London Wetland Centre 	A number of references have been added in the main policy and supporting text in relation to the importance of dark environments, including a cross-reference to Policy 43 'Floodlighting and other external artificial lighting', which has also been amended to emphasise this matter.

			<p>Richmond Park Bushy Park Barnes Towpath Home Park Barge Walk (towpath Home Park) Marble Hill Park Corporation Ait Flower Pot Islands Petersham Meadows Petersham Lodge Woods The Copse Glover’s Island (Petersham Ait) If incorporated into the plan this could sit within the Biodiversity section or within the place-based strategies with the relevant sites listed for each place.</p>	
-		Note comments on site-specific designations in the Salix Ecology Review of Sites of Importance for Nature Conservation in Richmond upon Thames (November 2021) are included in this schedule under Appendix 4 which lists the Richmond SINC and Candidate SINC.		
-		Policy 40. Rivers and river corridors		
983	Hilary Pereira, River Thames Society	Policy 40. Rivers and river corridors	<p>Policy 40 F indicates the Council is rightly proud of river-related industry. The last remaining working slipways, essential for the maintenance of larger craft including passenger boats, imminently risk being lost. Excessive rebuilding costs after a fire has a familiar ring, and the yards at Platts Eyot may struggle in an unfettered market. The remaining major slipways at EelPie island are now on the market, priced more to recognise the profit potential from housing than from a working boatyard. Only rigid planning controls can protect these yards and any compromises made on the rebuilding of Platts Eyot could be very significant for the river. This policy needs to be worded more strongly to protect these and other river-related uses, many of which would struggle to compete with alternative uses on strictly financial criteria: 2 years-worth of 'marketing' is likely to always come up with the answer the developer seeks. Those river-related uses should be for the benefit of the general public; other uses are so often for the privileged few, promoted by those that seek to make a short-term profit. In most riverside sites, no development is preferable to inappropriate development, and provides time for proposals for genuine river-related uses to get the necessary head of steam. Policy 47 on p284 on the use of the river for transport depends on the continuation of river infrastructure, which as well as working boatyards with slipways also means wharves and landing stages (Gauchos please note).</p>	<p>Noted. Part F of the policy clearly states that the loss of river-dependent and river-related uses will be resisted; this includes amongst other things slipways. It is considered that this is a strongly worded policy, and the requirement for marketing for 2 years is generally above what other authorities are requesting.</p>
984	Hilary Pereira, River Thames Society	Policy 40. Rivers and river corridors, page 262	<p>Ensure any riverside public access which is secured in the planning process is genuine and free for all at all hours, not conditional and limited at the discretion of the developer/riparian owner (policy 40, page 262). This prevents the creeping privatisation of what should be public space.</p>	<p>The Council will amend Policy 40, part D.3. to read; “Provide new public access to the riverside where possible, which should be accessible at all times, and maintain existing points of access to the foreshore subject to health and safety considerations. All major development proposals adjacent to the borough's rivers are expected to provide public access to the riverside.”</p>
985	Heather Mathew, Richmond Council for Voluntary Service (CVS)	Page 19 (in relation to River Thames)	<p>Pg 19 “Protect and improve the unique environment of the borough’s rivers especially the River Thames” The Thames does not start and finish in Richmond. The plan could think about the neighbouring boroughs’ development on the borough borders and ways of working cross borough to gain benefit along the length of the river that flows through it.</p>	<p>The Richmond Local Plan is part of the statutory development plan for this borough only; it cannot set policies for neighbouring authorities. Notwithstanding, it should be noted that the Council works closely with neighbouring boroughs, partner organisations and stakeholders through for example strategies such as the Thames Landscape Strategy as well as the Thames Strategy (Kew to Chelsea). In addition, the Thames Estuary TE2100 Plan also sets out how the Environment Agency and our partners can work together to manage tidal flood risk in the Thames Estuary. No further amends to the policy necessary.</p>
986	Gary Backler, Friends of the River Crane Environment (FORCE)	Policy 40. Rivers and river corridors	<p>This policy is presented largely with reference to the River Thames. We believe that many of the ambitions and protections proposed in (21.92) would be equally applicable to the River Crane. The Crane provides a continuous green seam through the west of the borough, including through more deprived areas, and therefore has scope to add more marginal value in terms of amenity and public health benefits. LBRuT as a major riparian owner should have more scope to influence development outcomes along the Crane corridor.</p> <p>We strongly welcome the explicit recognition in (21.89) that “Where appropriate, developments alongside and adjacent to the River Crane should contribute to the overarching aim of creating a metropolitan park that provides a continuous, accessible link between Hounslow Heath and the River Thames, incorporating river restoration works along the lower Crane, including a long distance footpath, improved access for surrounding communities and an enhanced wildlife / ecological corridor.” We also welcome the explicit linkage to site developments at “Greggs bakery, The Stoop, Twickenham Stadium, the Depot and Mereway Day Centre.”</p> <p>Where any other sites which currently have private frontage onto the River Crane come forward for development, we would like LBRuT to pursue a long-term strategy of securing free and unfettered public access to continuous stretches of the river, gradually eliminating breaks in the continuous access. Thus, we support the requirement that “all major development proposals adjacent to the borough's rivers should provide through-site links to the riverside to enable the public access to the riverside environment” (21.95) and would like this extended to the Crane and to all feasible sites, not just major sites. We would like public access to be available at all times of day and night, whilst protecting the river corridor from light and noise pollution. We strongly support the requirement for an 8-metre buffer zone.</p>	<p>The support is noted and welcomed.</p> <p>It is considered that the requirements for development alongside and adjacent to the River Crane are sufficiently covered in Part D of the Policy as this explicitly applies to all the borough’s river corridors. Whilst desirable, it would neither be feasible nor practicable to require public access to be provided in all developments (and not just majors) as this would include minor and other householder developments and those proposing extensions, changes of use without building works etc. The Council has already ensured further public access to the Crane riverside since the last Local Plan was adopted, with the new route that links Twickenham station to the college. The Council is also currently undertaking further work with Sustrans to understand access limitations and identify new opportunities.</p> <p>It is considered that FORCE’s ambitions are already covered in paragraph 21.89.</p>

987	Kevin Scott, Solve Planning Limited on behalf of Port Hampton Estates Limited	River-Related Uses	<p>Policy 40 relates to the protection of rivers and river corridors in the Borough. This includes the protection of river-dependent and river-related uses and which will apply to Platt's Eyot and future redevelopment proposals.</p> <p>Policy 40. Rivers and river corridors</p> <p>...</p> <p><i>Riverside uses, including river-dependent and river-related uses</i></p> <p><i>F. The Council will resist the loss of existing river-dependent and river-related uses that contribute to the special character of the River Thames, including river-related industry (B2) and locally important wharves, boat building sheds and boatyards and other riverside facilities such as slipways, docks, jetties, piers and stairs. This will be achieved by:</i></p> <ol style="list-style-type: none"> <i>1. resisting redevelopment of existing river-dependent or river-related industrial and business uses to non-river related employment uses or residential uses unless it can be demonstrated that no other river-dependent or river-related use is feasible or viable;</i> <i>2. ensuring development on sites along the river is functionally related to the river and includes river-dependent or river-related uses where possible, including gardens which are designed to integrate and enhance the river, and be sensitive to its ecology; Increasing biodiversity and the quality of our green and blue spaces, and greening the borough</i> <i>3. requiring an assessment of the effect of the proposed development on the operation of existing river-dependent uses or riverside gardens on the site and their associated facilities on- and off-site; or requiring an assessment of the potential of the site for river-dependent uses and facilities if there are none existing;</i> <i>4. ensuring that any proposed residential uses, where appropriate, along the river are compatible with the operation of the established river-related and river-dependent uses;</i> <i>5. requiring setting back development from river banks and existing flood defences along the River Thames</i> <p>As with the employment policies, we generally support the provisions of this policy but we consider that it needs to address the situation where site specific conditions which may preclude meeting all or some of these objectives. Alternatively, this could be addressed in the site specific text and final policy for Platt's Eyot.</p>	<p>It is noted that the respondent generally supports the policy. It would not be appropriate to refer to site specific circumstance or conditions as the onus will be on the applicant to demonstrate and set out why one or more of the criteria cannot be met.</p>
988	Tim Catchpole, Mortlake with East Sheen Society	Policy 40. Rivers and river corridors	<p>We are pleased to see reference made to the Thames Policy Area and to the special character of the reach set out in the Thames Landscape Strategy and Thames Strategy. The latter should read 'Thames Strategy (Kew to Chelsea)'. We would be interested to know what the Local Plan has to say about the GLA's Green Grid Study (2016) which showed the whole section of the River from Hampton Court to the Wandsworth border as 'Arcadia'.</p> <p>Para 21.84 should include the following: "These river valleys and the tributary streams and their valleys concentrate the groundwater hydraulic flow systems over large areas depending on the porosity and permeability of the soils and subsurface. Where they intersect particular aquifers can be a zone of particular sensitivity to pollution, flood risk, biota contamination and other effects. These intersection zones need careful mapping and control. Any building work, especially basements, that may puncture a sealed aquifer to allow groundwater ingress must be tightly controlled."</p> <p>Para 21.87 about the network of linked waterways should include the following: "However, they also create barriers to movement and need expensive bridges and ferries to solve the problem."</p>	<p>The reference to "Kew to Chelsea" will be added as suggested.</p> <p>The suggested wording for paragraph 21.84 is not considered appropriate in the context of this policy, particularly as policies 53 and 54 both deal with basement and subsurface development and link to further guidance provided by the Council. It is important that the Plan is read as a whole.</p> <p>Paragraph 21.93 will be amended to refer to exploring opportunities to improve accessibility between different areas of the borough that are separated by the borough's rivers, such as between Ham and Twickenham.</p>
989	Michael Atkins, Port of London Authority (PLA)	Policy 40. Rivers and river corridors	<p>Policy 40 is predominately unchanged from current policy LP 18 which is in principle welcomed. In order to strenghten the policy further it is reccomended that the policy contains a specific referance to the need for development proposals adjacent to the riverside to consider appropriate suicide prevention measures, such as CCTV and appropriate fencing/edge protection and signage. This would be in line with the PLA's 'A safer riverside' guidance for development alongside and on the tidal Thames and the Tidal Thames Water Safety Forum (which includes the PLA, RNLI and emergency services.) Drowning Prevention Strategy (2019). Both documents are availble at to view at http://pla.co.uk/Safety/Water-Safety/Water-Safety. As background, in 2018, 30 people drowned in the river, accounting for 8% of drowning-related deaths nationally, and there were 688 recorded cases of people threatening to enter the Thames to take their life. The PLA therefore considers it vital for new development proposals to take the need for this infrastrucutre into consideration.</p> <p>Changes necessary: The following amendment is proposed to part D (access) of policy 40 "5. Consider the need to provide appropriate suicide prevention measures, such as edge protection and appropriatte signage in riverside areas.</p>	<p>Agreed. The Council will add the suggested wording to the policy so that Policy 40 part D point 4 reads: "Provide riparian life-saving equipment where required and necessary; this includes, where relevant, the provision of appropriate drowning prevention measures, such as edge protection and appropriate signage in riverside areas."</p> <p>We will also add an additional sentence to paragraph 21.93 as follows: "The Council will require new developments adjacent to the river to consider the need to provide appropriate drowning prevention measures, such as edge protection, appropriate signage and CCTV."</p>
990	Jon Rowles	Policy 40. Rivers and river corridors	<p>Need to map covered rivers and seek redevelopment proposals to see that they are restored to a natural uncovered state. There are ones that run through the Fulwell bus garage, Kneller Hall, and Twickenham Stadium amongst others</p> <p>The council should explore the options to open up Longford River to more public access and have paths along the whole stretch between Hanworth Airpark and Bushy Park. Having a new walking route would improve locals physical and mental health.</p>	<p>The matter of de-culverting watercourses to provide flood mitigation along flood corridors is considered in detail in the Council's Surface Water Management Plan (2021). This Plan identifies amongst a variety of other measures that returning watercourses to a more natural state is generally not suitable for constrained or heavily urbanised areas. Notwithstanding, the Council agrees that there may potentially be some opportunities for de-culverting watercourses, provided it is technically feasible and practicable to do so. Therefore, a new paragraph is added to the supporting text of Policy 40 as follows: "The Council will support initiatives to de-culvert rivers where it is feasible and practicable to do so, in line with the Council's Surface Water Management Plan."</p> <p>There are significant constraints, such as around land ownership and physical/locational constraints that would make it difficult to require a new walking route as part of the Local Plan. Notwithstanding, the GLA's new Sustainable Transport, Walking and Cycling guidance (December 2022) includes a</p>

				<p>new requirement for boroughs to set out a full network of walking and cycling routes. This will be picked up in Policy 47 (Sustainable travel choices).</p> <p>In relation to Policy 40, the Council considers that part D is sufficient to require major new development and other new development where possible to deliver new public access to the riverside, whilst ensuring that existing access is retained (this requirement applies to any river/watercourse in the borough).</p>
991	George Goodby, Environment Agency	Policy 40. Rivers and river corridors (in relation to flood risk)	<p>Similarly, Policy 40 Rivers and river corridors could promote the link between protecting and enhancing river corridors for design reasons as well as biodiversity and flood risk benefit.</p> <p>Part A could be updated to read <i>'The natural, historic and built environments of the Borough's water courses will be protected. Development adjacent to the river corridors will be expected to contribute to improvements and enhancements to the river environment, including improved public spaces, access to the river and the Thames Path, the creation of new habitats, improvement of flood defences and flood storage'</i>.</p> <p>Recommended action: We recommend you update the wording in Policy 40 Part A to incorporate the multiple benefits that can be achieved along the development of river corridors.</p>	<p>Noted. Policy 40 part A will be amended as follows:</p> <p><i>"The natural, historic and built environments of the Borough's watercourses will be protected. Development adjacent to the river corridors will be expected to contribute to improvements and enhancements to the river environment, including improved public spaces, access to the borough's rivers, especially the Thames Path, the creation of new habitats, and improvements of flood defences and flood storage."</i></p>
992	George Goodby, Environment Agency	Policy 40. Rivers and river corridors	<p>As discussed in our comments on the plan's strategic objectives, all waterbodies in the borough are failing to achieve 'good ecological status' or 'good ecological potential' and therefore development needs to help address this. The policy should acknowledge the need to bring the waterbodies in the borough into good ecological status/potential in line with WFD requirements.</p> <p>We note that the requirement for a 16 metre set back for the tidal Thames and an 8 metre set back for other main rivers (including fluvial sections of the Thames) is included under Policy 8 Flood Risk and Sustainable Drainage, this requirement could equally sit under this policy. We note that Part F(e) of Policy 40 mentions set back requirements but does not give distance requirements – as a minimum this should be corrected so it is in line with Policy 8, or buffer zone requirements should be expanded to a subsection of Policy 40 in its own right, incorporating the requirements of Policy 8 part I (3).</p> <p>Undeveloped buffer zones between new developments and rivers are not only important in flood risk terms (as discussed in the "flood risk" section of our comments, but also have value:</p> <ul style="list-style-type: none"> • Providing space for functioning riverine habitats. • Creating habitat connectivity along the river corridor. • Reducing the levels of diffuse pollution reaching the watercourse. • Providing space for natural geomorphological processes to occur. <p>Please see the suggested wording for buffer zone requirements falling under Policy 40:</p> <p>G: Undeveloped buffer zones and riverine biodiversity</p> <ol style="list-style-type: none"> 1. Unless exceptional circumstances are demonstrated for not doing so, development should be set back 16m from the landward side of Thames Tidal flood defences, and 8m from the top bank of all other main rivers (including fluvial sections of the Thames). 2. Development proposals that include culverting and hard bank protection, including sheet piling, will not be permitted. 3. Buffer zones should be planted with locally native species of UK genetic provenance and free from any formal landscaping, including gardens. 4. To reduce light spill into the river corridor outside the buffer zone, all artificial lighting should be directional and focused with cowlings, in line with guidance for the reduction of intrusive light produced by the Institute of Lighting Professionals. 5. Where watercourses have been historically modified adjacent to or within development sites, the watercourse should be restored to a natural state. This includes the de-culverting of watercourses, re-naturalisation of riverbanks and restoring the natural width/depth of a watercourse where it has been degraded. 6. Where barriers to fish movement (e.g., weirs) are present in a watercourse adjacent to or within a development, the design should include the removal of that barrier, or where not feasible, measures to allow for the natural movement of fish within the watercourse. <p>We would welcome the production of a separate advice note on watercourses, like the River Wye Advice Note produced by Wycombe District Council.</p> <p>This advice note includes sections on the design of new riverside development (and the inclusion of buffer zones); landscape design of the riverbank; public access; surface water run-off and the avoidance of pollution and weirs/barriers to fish passage.</p>	<p>The Local Plan needs to be read as a whole and it's unnecessary to repeat requirements of other policies elsewhere in the Plan. Notwithstanding, paragraph 21.90 will be updated to include a reference to Policy 8. Flood risk and sustainable drainage, including the distance requirements.</p> <p>Reference will also be included in relation creating buffer zones that support green infrastructure networks and reduce light spill into the river (also see Policy 43. Floodlighting and other external artificial lighting).</p> <p>To reflect the potential opportunities for de-culverting, a new paragraph is added to the supporting text of Policy 40 as follows: <i>"The Council will support initiatives to de-culvert rivers where it is feasible and practicable to do so, in line with the Council's Surface Water Management Plan."</i></p> <p>In addition, a new paragraph will be added after 21.90, which states: <i>"Where barriers to fish movement (such as weirs) are present in a watercourse adjacent to or within a development, the applicant is encouraged to propose a design to include the removal of that barrier, or where not feasible, incorporate measures to allow for the natural movement of fish within the watercourse."</i></p> <p>We note the suggestion of developing a separate advice note on watercourses; any such additional guidance would be subject to resources.</p>
993	Lucinda Robinson, Marine Management Organisation (MMO)	Paragraph 21.88	<p>[See comment 211 for general points about marine planning and marine licensing]</p> <p>Further points to note</p> <p>Section 21.88 you refer to the South East Marine Plan here and its boundary up to MHWS, this means there is an overlap with terrestrial planning. The Local Plan could reference the marine and terrestrial planning overlap and the benefits of working with the MMO in aiding the success of the Local Plan. The local plan could also ensure the policies do not conflict with marine plan policies, this could be done through considering and referencing specific and relevant marine plan policies within the Local Plan policies.</p> <p>The East Inshore and East Offshore Marine Plans were adopted in 2014, and the South Inshore and Offshore Marine Plan was adopted in 2018, which cover the adjacent areas. Please ensure correct reference to the South East, South, and East marine plan areas where included.</p> <p>I believe your council did not attend a South East Marine Plan Implementation Training session in March 2021. This provided an introduction to marine planning, and I would suggest re-visiting the material in our recorded webinar which supported the</p>	<p>The Council considers that paragraph 21.88 already addresses the points raised. See also response to comment 211, further details are added to clarify the remit of the Marine Plan and the Marine Management Organisation (MMO).</p>

			Consultation of the South East Marine Plan. Please let me know if you have any questions regarding implementation of the marine plan. As previously stated, these are recommendations and we suggest that your own interpretation of the South East Marine Plan is completed. We would also recommend you consult the following references for further information: South East Marine Plan and Explore Marine Plans .	
-	John Waxman, Crane Valley Partnership	General in relation to river corridor enhancement and active travel	[See comment 209 in relation to river corridors]	The Council notes the points raised by the Crane Valley Partnership, which largely endorse FORCE's formal response that has been addressed elsewhere in the Plan. On the whole, the Council considers that Policy 40 sufficiently covers the points raised (subject to the minor proposed amendments), particularly as the Plan needs to be read as a whole, including other policies such as Policy 34. Green and Blue Infrastructure, Policy 38. Urban Greening and Policy 39. Biodiversity and Geodiversity. The Council has added a reference to the Colne and Crane Valleys Green Infrastructure Strategy within paragraph 21.1 of the supporting text to Policy 34, alongside other policies and guidance for green and blue infrastructure.
-	Mary Egan	River corridors	[See comment 530 on Site Allocation 14 in relation to development adjacent to the river]	Policy 40 already covers the points raised by the respondent and therefore no changes are required.
Policy 41. Moorings and floating structures				
994	Louise Fluker, The Richmond Society	Riverside uses, including river-dependent and river-related uses p 265 paragraph 21.100	how will the Council deal with requests to use riverside structures for different purposes - e.g. landing stages becoming temporary restaurants or shared use? There is likely to be increasing pressure for greater commercial use extending further towards Petersham	Para 21.101 sets out that the Thames is MOL and thus 'inappropriate' development (such as temporary restaurants) is assessed under criteria in the NPPF – namely paragraph 149 (b) would protect existing moorings and floating structures connected to use for outdoor sport/recreation from loss. This is further supported in paragraph 21.102.
995	Hilary Pereira, River Thames Society	Policy 41. Moorings and floating structures	Policy 41C includes important principles relating to the use of floating structures. In appropriate circumstances, the Council needs to follow through with enforcement action when the existing rules appear to be being flouted, and the use in practice fails to comply with that for which planning approval was granted. Some harsh words would be appropriate in relation to planning transgressions, most particularly for floating structures purported to be for the wider benefit for the community when this cannot be demonstrated. Floating but static businesses may make no contribution to business rates, and should not be granted a free ride at the cost of others.	Planning enforcement powers are discretionary, and the Council is not required to take action just because works are carried out without planning permission. National planning policy explains that enforcement action should only be taken where unauthorised works cause serious harm in planning terms. Where works cause little or no harm, it advises that enforcement action should be avoided. The Council's Planning Enforcement Policy is referred to in Policy 55 of the Draft Plan.
996	Michael Atkins, Port of London Authority (PLA)	Policy 41. Moorings and floating structures	Policy 41 is predominately unchanged from current policy LP 19 which is in principle supported. The proposed policy includes a requirement that replacement houseboats should not be materially larger than existing nor harm the character of the river, and the supporting text goes on to state that the Council has limited powers regarding the appearance of boats. It is therefore recommended that further justification its required for the inclusion of this policy wording within the supporting text.	The Council has limited powers regarding the appearance of boats docked at moorings as these boats do not require planning permission and are not subject to planning controls. Applications for new houseboats will be resisted, however applications for replacement houseboats must demonstrate compliance with criteria B in line with paragraph 149 (d) of the NPPF.
997	George Goodby, Environment Agency	Policy 41: Moorings and floating structures	Policy 41 Part A states that 'there is a presumption against new proposals for houseboats...'. We would support this stance but recommend that it is updated to say 'no new proposals for houseboats...'. This would strengthen the argument against any new or extensions to residential houseboats. We encourage you to revise the wording to more accurately reflect the outcomes you envisage. Recommended action: We recommend whether you strengthen the policy wording for Policy 41 Part A.	Paragraph 21.101 sets out that new houseboats are inappropriate development within MOL and proceeds to identify negative qualities that can arise from new houseboat development. Under criteria A, any proposal would have to clearly demonstrate that there would not be any negative impacts arising from the development or that there were benefits that outweighed any negative impacts in line with other policies in the plan. It is impossible for a Local Plan to capture every possibility and thus the wording is considered strong enough to resist new houseboat development including extensions to existing houseboats, while providing the flexibility to appropriate access potential exceptional cases.
998	George Goodby, Environment Agency	Policy 41: Moorings and Floating Structures	We are often consulted on applications for new and replacement moorings and floating structures on the River Thames. These invariably involve sheet piled bank protection methods and result in shading of the river. This compromises the objectives of the Water Framework Directive to achieve good ecological status/potential for waterbodies within the borough. This policy should discourage the use of hard engineering approaches to riverbank protection wherever possible.	The Council will add a new line under criteria C that proposals shall protect and/or enhance the biodiversity of the river and extrapolate in the supporting text. Policies 34, 35, 38 and 40 also have sufficient wording that, taken together, will ensure proposals would not adversely impact the ecological status of waterbodies.
999	Tim Catchpole, Mortlake with East Sheen Society	Policy 41. Moorings and floating structures	No comment.	Noted.
1000	Suzanne Parkes, Elmbridge Borough Council	Policy 41. Moorings and floating structures - River Thames development	In regard to Policy 41 'Moorings and floating structures' where the LBR will resist new proposals for houseboats unless they are replacements, we would welcome sight of the evidence base that supports this policy. As mentioned at our meeting on 24 January 2022, EBC has recently assessed the housing needs of boat dwellers on the stretch of the River Thames in Elmbridge Borough. The Assessment found that there is a need for 10 additional moorings. This will inform our policy making and comply with requirements to assess boat dwellers needs set out in the National Planning Policy Framework (NPPF) 2021 and the Housing and Planning Act 2016. It is therefore, unclear at this stage how Policy 41 is justified.	The River Thames is designated as MOL and therefore new housing development is inappropriate in line with the NPPF. This matter has been discussed in Duty to Cooperate discussions. The Council's updated Research on Gypsies and Travellers considers needs of riverboat dwellers. A Londonwide Gypsy & Traveller Needs Assessment is also underway, as it is noted that the London Mooring Strategy, produced by the Canal and River Trust, has identified zones for potential additional moorings elsewhere in London.
Policy 42. Trees, Woodland and Landscape				

1001	Bridget Fox, on behalf of the Woodland Trust	Policy 42. Trees, Woodland and Landscape	<p>In general, we welcome this policy.</p> <p>We welcome the policy to protect ancient woodland and existing trees (B1-B4). We recommend strengthening the policy on ancient woodland (B2) to include appropriate buffers, and to make clear that this policy applies also to ancient and veteran trees outside woods as well as the full range of ancient woodland habitats, including historic parkland.</p> <p>We welcome the requirement to replace trees that are lost to development (B5). We recommend strengthening this with a requirement to replace trees on a greater than 1:1 basis, to increase the number of trees, and the tree canopy cover, in line with emerging requirements for Biodiversity Net Gain.</p> <p>We recommend setting a proposed ratio of tree replacement, which reflects the Woodland Trust guidance on Local Authority Tree Strategies (July 2016) with a ratio of at least 2:1 for all but the smallest trees and ratios of up to 8:1 for the largest trees. The Woodland Trust recommends a target for 30% canopy cover on development sites, to be achieved by a mixture of retention of existing trees supplemented by appropriate additional planting.</p> <p>We welcome the policy in support of appropriate native species (B6 and C3).</p> <p>We recommend strengthening this with a preference for UK & Ireland Sourced & Grown stock (UKISG) to support biodiversity and biosecurity.</p> <p>Changes consider necessary: We propose the following changes: B2 after "2. resist development that would result in the loss or deterioration of irreplaceable habitat such as ancient woodland" add "historic parkland or individual ancient or veteran trees. Where development is adjacent to ancient woodland, a minimum 50 metre buffer should be maintained between a development and the ancient woodland, including through the construction phase, unless the applicant can demonstrate very clearly how a smaller buffer would suffice." B5 after "require, where practicable, an appropriate replacement for any tree that is felled" add "to achieve a net increase in tree cover, with a ratio of at least 2:1 for all but the smallest trees and ratios of up to 8:1 for the largest trees." After "... (CAVAT);" add "with the goal of achieving an overall canopy cover target of 30%". B6 after "the use of native species as well as large-canopied species are encouraged where appropriate" add "as is the specification of UK & Ireland sourced and grown (UKISG) tree stock." C3 after "prioritising the use of appropriate native tree and shrub species" add "and the specification of UK & Ireland sourced and grown (UKISG) tree stock."</p> <p>Further information on these policy recommendations can be found in the Woodland Trust's publications:</p> <ul style="list-style-type: none"> • Planners Manual for Ancient woodland https://www.woodlandtrust.org.uk/publications/2019/06/planners-manual-for-ancient-woodland/ • Residential developments and trees https://www.woodlandtrust.org.uk/publications/2019/01/residential-developments-and-trees/ • Tree strategies https://www.woodlandtrust.org.uk/publications/2016/07/local-authority-tree-strategies/ • Emergency tree plan https://www.woodlandtrust.org.uk/publications/2020/01/emergency-tree-plan/ 	<p>The Council notes the Woodland Trust's comments and suggestions. These have been taken on board and will be incorporated into the policy where appropriate.</p> <p>As there is no ancient woodland within the Borough's boundary, the reference to ancient woodland has been removed completely from the policy. Also, ancient and veteran trees outside woods are already protected under this policy through criteria B.1. However, the Council will replace 'ancient woodland' in B.2 to 'historic parkland' to refer to other important and irreplaceable habitats.</p> <p>The London Environment Strategy aims to increase canopy cover by 10% to an overall canopy cover of 23.1% across Greater London. The Council supports this objective and will include more explicit wording in the supporting text to signpost where opportunities to secure a net increase in tree cover can be achieved. The Council also intends to prepare a Tree Planting Strategy, a commitment in the Climate Emergency Action Plan, which is expected to address increases to canopy cover as well as guidance on tree procurement. The policy firmly supports the sourcing of native trees where appropriate, as there has to be consideration of market conditions and the availability of stock.</p>
1002	Tim Catchpole, Mortlake with East Sheen Society	Policy 42. Trees, Woodland and Landscape	No comment.	Noted.
1003	Katarina Hagstrom	Policy 42. Trees, Woodland and Landscape	<p>Comment:</p> <p>There appears to be a gap in Planning Policy on the protection of Hedgerows – particularly those meeting the requirements to classify them as 'UK BAP habitat' or 'important' per Natural England guidance on hedgerows (2019). My understanding is that there is a grey area where such hedgerows are protected in a rural setting, but not in an urban setting, where it is assumed that hedgerows can be protected through planning policy.</p> <p>Given the importance of hedgerows in an urban setting for supporting Biodiversity, by providing habitat and commuting corridors, it would be helpful if they could be given more prominent and explicit protection within the Local Plan.</p> <p>Illustrative examples (alternative wording may be better):</p> <p>A. In accordance with London Plan (2021) Policy G7 (Trees and woodlands), the Council will require the protection of existing trees, [add: as well as the protection of important Hedgerows and other vegetation of landscape significance] and the provision of new trees, 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.</p> <p>C. The Council will use Tree Preservation Orders (TPOs) or attach planning conditions to protect any trees considered to be of value to the townscape and amenity in order to secure their retention. [add: Planning conditions will also be used to protect important Hedgerows and other vegetation of landscape significance] etc. for other sections.</p>	<p>It is noted that there is an anomaly in legislation where hedgerows in rural settings are protected but those in urban areas are not. The Council has clear and ambitious objectives regarding biodiversity including that proposed developments result in a net biodiversity gain. The Council is proposing wording in the supporting text of the policy to explicitly refer to hedgerows and their contribution to biodiversity. The Richmond Biodiversity Action Plan also recognises the importance of hedgerows for their biodiversity.</p> <p>The criteria for protected hedgerows are set out in the Hedgerow Regulations 1997, which focuses on hedgerows in rural settings. This is the only statutory protection for hedgerows in legislation, and thus hedgerows outside these definitions cannot be protected in planning policy on the same footing as trees. The London Plan policy G7 does not mention other kinds of vegetation other than trees and the Council will clarify this in the Regulation 19 version of the Plan.</p>
-		Policy 43. Floodlighting and other external artificial lighting		
1004	Gary Backler, Friends of the River Crane Environment (FORCE)	Policy 43. Floodlighting and other external artificial lighting	<p>We are concerned at the presumption that "Floodlighting...of sports pitches...will be permitted unless there is demonstrable harm to character, biodiversity or amenity and living conditions." It can be very difficult to demonstrate harm, for example, where species have historically abandoned spaces because of development, and are deterred from re-colonisation because of invasive light. In these circumstances, it is more difficult to evaluate forgone biodiversity potential than viability impacts. We would in particular oppose the floodlighting of the College Field and Moor Mead Park in the River Crane corridor, and the lighting of any path along the River Crane or Duke of Northumberland's River, including through Twickenham Junction Rough and Crane Park.</p>	<p>The comments regarding already-lost biodiversity is noted. In accordance with the re-worded Criteria A, applicants will be required to demonstrate there is no unacceptable harm to, <i>inter alia</i>, biodiversity. Policy 39 also requires developments to result in a net-biodiversity gain where possible. It is hoped this policy will, over time, raise the biodiversity baseline to which applications for floodlighting will be assessed.</p>

			We also consider that the Council needs to develop and adopt a policy that recognises and protects the value of dark corridors through the borough as important features for wildlife – particularly bats – as well as their value for appreciation of the night sky in an urban environment.	The Plan does not formally identify any ‘dark corridors’ for designation as it is not considered practicable. There is no policy requirement coming from within the NPPF or the London Plan, there are other protective designations for open space and biodiversity, and furthermore it would generally be difficult to achieve in urban environments. There may be opportunities to maintain dark night-time corridors/refuges where they exist, and in line with the priorities in the Local Plan and the Biodiversity Action Plan limit the impact of lighting in wildlife and ecological corridors. Add a reference to the supporting text to refer to the importance of dark environments. See also response to comment 914 – added to the supporting text to Policy 34 a reference to artificial lighting and bat species.
1005	Tim Catchpole, Mortlake with East Sheen Society	Policy 43. Floodlighting and other external artificial lighting	No comment.	Noted.
1006	Katy Wiseman, National Trust	Policy 43 Floodlighting and other external artificial lighting	The National Trust supports proposed Policy 43 which seeks to eliminate harm to character, biodiversity or amenity and living conditions from light pollution and aligns with paragraph 185 of the NPPF which requires new development to take account of light pollution. We also welcome criterion D1. which includes historic integrity as a criterion to be considered when assessing floodlighting as light pollution can have a significant adverse impact on the historic integrity of historic building if poorly designed.	Support noted.
1007	Katarina Hagstrom	Policy 43 Floodlighting and other external artificial lighting – Part A and paragraphs 21.114, 21.115 and 21.118	<p>Context:</p> <p>Within a biological context, the body of evidence for artificial light causing harm is extensive. Within any natural environment: <i>“Given the effects of light on living organisms, it is plausible, and even <u>probable, that introduction of artificial light into the natural light regime will disturb the normal routines of many plants and animals</u>”</i> (Gov.uk: Royal Commission on Environmental Pollution’s 2009 report, Artificial light in the environment, paragraph 4.4). (emphasis added).</p> <p>Disturbance of nature often causes harm. Even where individual species may appear to show ‘light tolerance’, or artificial light appears to bring benefits, upon review this is often found to be accompanied by harm in the form of increased risk /reduced fitness / changes in relative competitive dynamics between species / fundamental changes within the ecosystem (eg. foodchains). etc.</p> <p>Current Ecological Impact Assessment guidelines (CIEEM 2019) are clear that a precautionary approach to evaluation must be applied: <i>“In cases of reasonable doubt, <u>where it is not possible to robustly justify a conclusion of no significant effect, a significant effect should be assumed.</u>”</i> (CIEEM, Guidelines for Ecological Impact Assessment in the UK and Ireland, v1.1, updated Sep 2019, 5.35). (emphasis added).</p> <p>In line with the above, where artificial light may impact on Biodiversity, it is thus appropriate to assume a significant effect, unless it is possible to robustly justify a conclusion of no significant effect.</p> <p>Furthermore, National Planning Policy (NPPF 2021) includes no presumption in favour of Floodlighting or External Artificial Lighting. However, NPPF 2021 #185 does require that <i>“Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. In doing so they should: ... c) limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation”</i></p> <p>Issues:</p> <p>The current wording of Policy 43A, 21.114, 21.115 and 21.118 on floodlighting and external artificial lighting do not appear to meet the standard that it is appropriate to apply – ie that it is appropriate to assume a significant effect (of artificial light on biodiversity), unless it is possible to robustly justify a conclusion of no significant effect.</p> <p>Furthermore, it appears to place the burden of proof on the Council, stretching the Council’s limited resources, rather than requiring the developer to <i>“[submit] enough information for [the Council] to <u>fully consider the effect on on protected species and their habitats</u>”</i> (emphasis added) – which is required under Planning Guidance (NE and DEFRA, Protected species and development: advice for local planning authorities).</p> <p>Furthermore, any form of presumption in favour of External Artificial Lighting is contrary to current trends in increased understanding of how artificial light harms Biodiversity and efforts to maintain Dark Corridors and decrease harmful light pollution (eg. removal of floodlighting in Bushy Park).</p> <p>Suggestion:</p> <p>It is suggested that the wording be altered to <u>apply a precautionary approach to the impact assessment of Artificial External Lighting / Floodlights</u>, particularly with respect to the consideration of any Biodiversity impact.</p> <p>For example:</p> <p>A. Floodlighting, including alterations and extensions, of sports pitches, courts and historic and other architectural features will be permitted [remove: unless there is demonstrable][replace with: where it can be demonstrated that there will not be significant] harm to character, biodiversity or amenity and living conditions</p> <p>21.114 Floodlighting can enable the full use of outdoor sport and leisure facilities, but [add: significant] consideration must be given to any [remove: demonstrable][add: likely] harm to biodiversity, amenity and local character.</p> <p>21.115 [Add: Where it can be demonstrated that there will not be significant harm to character, biodiversity or amenity and living conditions], External lighting for sports, security or other purposes, should be installed so that the intensity and direction of light does not cause any demonstrable harm.</p>	The significance of biodiversity considerations in floodlighting assessments is noted. The wording of Criteria A has been altered to put emphasis on the need to demonstrate there will not be unacceptable harm. The wording of paragraph 21.114 has also been altered to ensure likely harm is also considered beyond demonstrable harm as per Criteria A of the policy. Add a reference to the supporting text to refer to the importance of dark environments Subsequent paragraphs have been left as-is as they are considered sufficient.

			21.118 It is important that floodlights are designed to be as unobtrusive as possible when unlit, in terms of number, height, width, design, colour and siting. Light pollution [remove: should be minimised to protect][add: must be maintained below a level at which there is likely to cause harm to] biodiversity as well as...	
1008	Katarina Hagstrom	Policy 43. Floodlighting and other external artificial lighting - Part E	<p>Comment:</p> <p>Whereas favourable consideration of improvement of existing lighting installations is appropriate, it should be made explicit that the appropriate 'baseline' against which any floodlighting or external artificial lighting proposal will be assessed against will exclude:</p> <ul style="list-style-type: none"> - any temporary or mobile light installation; - any light installation that has not been granted planning permission; - any legacy light installations which have been out of use for any period of time; - any significant increase in use in the recent past, above the long-term baseline; etc. <p>Without such a condition, policy 43 E can be abused, and temporary artificial light installations can be used as a simple means to get around the Policies in place to Protect Biodiversity.</p> <p>Planning guidance (Gov.uk, Natural Environment guidance; key issues in implementing policy to protect and enhance the natural environment, July 2019) provides guidance on a similar issue - ie the baseline to be used for Biodiversity Net Gain assessments: where deliberate harm to the site's biodiversity value has taken place, this can be discounted in assessing the underlying value of the site.</p>	Criteria E seeks to favourably consider proposals to improve lighting provision against existing adverse effects. The Council considers the policy adequately robust to secure such improvements by means of case-by-case assessments. Temporary lighting may not require planning permission; although in exceptional circumstances, the granting of a temporary planning permission could enable a review of lighting impacts after installation, this is considered appropriate to assess on a particular site rather than set any precedent in the Plan.
1009	Vicky Phillips, Habitats & Heritage	Policy 43. Floodlighting and other external artificial lighting	as currently worded this policy is not adequate to protect biodiversity. We suggest rewording para A to read "floodlighting will not be permitted unless it can be demonstrated that there will be no harm to character, biodiversity etc." meaning that the onus is on the developer to carry out a full assessment. Para E is also open to abuse as it is not clear how long the lighting which is being replaced needs to have been in use and whether a lapse of time during which it is not used means that this para can be discounted.	The wording of Criteria A has been altered to put emphasis on the need to demonstrate there should be no unacceptable harm.
1010	George Goodby, Environment Agency	Policy 43. Floodlighting and Other External Artificial Lighting	Rivers and river corridors should be free from direct lighting, to minimise the impact on nocturnal animals such as bats that use tree-lined river corridors to commute along and for foraging. To reduce light spill into the river corridor, all artificial lighting should be directional and focused with cowlings. For more information see the Institution of Lighting Professionals guidance: https://theilp.org.uk/publication/guidance-note-8-bats-and-artificial-lighting/ . Where floodlighting is likely to result in light spill into the river corridor, a luminaire schedule should be submitted. Furthermore, a bat survey should be carried out along the part of the river impacted by the light spill by a suitability experienced ecologist.	The wording of Criteria A has been altered to put emphasis on the need to demonstrate there should be no unacceptable harm. Although specific guidance is mentioned as examples, and will be regularly updated by other institutions and bodies, add a reference to the Institution of Lighting Engineers Guidance Note for Bats and Artificial Lighting to the supporting text to highlight this particular guidance note.
1011	Simon Tompsett, Richmond & Twickenham Friends of the Earth	P269 Policy 43. Floodlighting and other external artificial lighting	- the emphasis seems to be the wrong way round. Floodlighting should not be permitted unless it can be shown that there would be no harm to biodiversity. This is important as light pollution can seriously disrupt night-flying insects and bats.	The wording of Criteria A has been altered to put emphasis on the need to demonstrate there should be no unacceptable harm.
1012	Philip Briggs, Richmond Bat Species Action Plan Steering Group	p.269 Policy 43. Floodlighting and other external artificial lighting	"A. Floodlighting, including alterations and extensions, of sports pitches, courts and historic and other architectural features will be permitted unless there is demonstrable harm to character, biodiversity or amenity and living conditions." This feels weighted in favour of floodlighting that is often far from essential. Harm may be very real without always being easily demonstrable. Please could there be something about the applicant needing to satisfy the planning officer that there is an actual need for lighting? Forcing the applicant to reflect on this might even nip some applications in the bud where the applicants find themselves hard pressed to really justify the need.	The Policy sets out the criteria that is assessed including meeting an identified need. The wording of Criteria A has been altered to put emphasis on the need to demonstrate there should be no unacceptable harm. Paragraph 21.117 also sets out the criteria of assessment which includes identifying the benefit of such proposals which would incorporate need.
1013	Peter Willan and Paul Velluet, Old Deer Park Working Group	Policy 43. Floodlighting and other external artificial lighting	No change proposed.	Noted.
1014	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	Policy 43. Floodlighting and other external artificial lighting	No change proposed.	Noted.
1015	Laura Hutson, Sport England	Policy 43. Floodlighting and other external artificial lighting	Sport England welcomes a policy that considers the positive benefits of sports lighting, which can enable the community to benefit from facilities year-round. Newer forms of LED sports lighting are generally less problematic in terms of light spill and the impact on the surrounding environment. Such lighting can also be automatically controlled in terms of timing if necessary. The reference to Sport England's own guidance on Artificial Sports Lighting is welcomed.	Support noted.
-		Improving design, delivering beautiful buildings and high-quality places		
-		Policy 44. Design Process		
1016	Tim Catchpole, Mortlake with East Sheen Society	Policy 44. Design Process	This new policy covers the optimizing of site capacity through the design-led approach, the content of the Design and Access Statement, the pre-app advice, design review panels, design codes, etc. This has come to replace the density matrix which has been used in all London Plans until now. There seem to be two issues here: optimizing capacity and efficient use of land through a design-led approach, and the quality of design itself. A design-led approach to good place-making should address function and aesthetics, and the latter is inevitably subjective, though clearly underpinned by policy and guidance, and by the Urban Design Study. It is good to see the Design Review Panel formally included as part of the process. This would sit better following Local Character and Design Quality. As mentioned above, we are not sure why this policy has appeared here at the end and not in the section on Local Character and Design Quality.	General support for the approach noted. Whilst there is some overlap with Policy 28. Local Character and Design Quality, Policy 28 is a Strategic Policy primarily concerned with heritage and culture. Policy 44 is considered to be relevant to the new policy (Policy 45) relating to the Tall and Mid-Rise Buildings and Policy 45 concerned with amenity impacts of development and it is therefore considered logical to package these three policies together under a section in the Local Plan (22) relating to 'Improving design, delivering beautiful buildings and high-quality places'. That a policy does not appear directly below another policy in the ordering of the Local Plan does not

				mean that those two policies would not be relevant to the assessment of an application; indeed there is some overlap within most of the policies given that there are number of 'golden threads' running through the Local Plan, such as design and sustainability, to name a few. It is therefore not considered that any amendments to the positioning of the policy are required.
1017	Graeme Fraser-Watson, The Teddington Society (Planning Group)	Planning applications (Section 22 Improving design, delivering beautiful buildings and high-quality places)	<p>We fully support the desire to improve design and deliver beautiful buildings and high quality places, but section 22 seemed a bit light on details as to exactly how this would be achieved. It is not clear to us how proposed developments will be "judged" to determine whether they are beautiful or not. Beauty, after all, is somewhat subjective. How will it be measured ?</p> <p>The draft plan rightly encourages developers and applicants to submit high quality plans that demonstrate sensitivity to the surrounding area. Often, in our experience, planning applications are validated that do not provide sufficient information on which to judge an application especially as it relates to surrounding buildings and the street scene. Given modern CAD techniques, we believe it is not too much to insist that all applications that potentially affect the street scene include before and after street scenes of the proposed development and its surrounding properties, and perhaps also three dimensional representations. It would be good if the local plan clearly said that the council would not validate those applications which do not provide sufficient information to judge the impact of the requested development on the surrounding area. Could this requirement be mandated within the local plan ?</p>	<p>Support for general approach noted.</p> <p>The supporting text to the policy sets out the processes and tools which will help ensure all development delivers good design, including reference to the National Design Code, National Model Design Code and the Council's borough-wide Urban Design Study, all of which will form the basis for a local Design Code. Whilst 'beauty' and design can be subjective, the creation of a local Design Code is expected to act as a starting point for developers as to what would likely be considered appropriate for the Borough. This will always depend on a number of factors including the unique context of the site, characteristics of the local area and the purpose/functionality of the building. The supporting text also makes clear the expectation that developers engage with the local community and other local interest groups early in the process to enable local communities to shape their local area. It is therefore not possible to specify what is 'beautiful' in isolation within the policy wording. No changes are therefore required.</p> <p>The supporting text to the policy makes clear the importance of 3D visual reality tools and other interactive digital modelling in allowing for an understanding of the visual impact of a development. The text makes clear that the submission of such modelling will be mandatory for buildings proposed in the tall building zones or those located within protected views and vistas. For these types of development, the submission of this information is considered vital for an understanding of the impact of the proposed buildings. It is intended to update the Local Validations Checklist, on adoption of the new Local Plan, to reflect this requirement. Similarly, the Council's Local Validations Checklist currently requires the inclusion of a Streetscape drawing in any submission for an application for infill development. It is not considered, however, that such high-level or detailed information would be essential to make an informed planning judgement on the visual impact of every planning application. Where a planning officer feels that the submission of this information is essential to make a decision on the application, this would be requested as part of the planning application process. However, it is not considered reasonable to make this a blanket requirement for all applications, and the current requirements are considered to adequately capture the requirement where it is needed. No changes to the wording of the policy are therefore considered to be necessary.</p>
1018	Peter Willan and Paul Velluet, Old Deer Park Working Group	Policy 44. Design Process	The wording of Part B of the Policy needs to be amended to omit reference to 'the design guidance for the relevant character area as specified within the Urban Design Study 2021' insofar as it refers to Tall and Mid-rise Building Zones in Figure 383 (on page 254) and in 'F. Richmond and Richmond Hill' (on page 255).	All development would be expected to have regard to the relevant character area set out in the Urban Design Study 2021, including proposals in Tall and Mid-Rise Building Zones and those within the Richmond and Richmond Hill character area. It is not considered that any changes to the wording are therefore considered to be necessary.
1019	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	Policy 44. Design Process	The wording of Part B of the Policy needs to be amended to omit reference to 'the design guidance for the relevant character area as specified within the Urban Design Study 2021' insofar as it refers to Tall and Mid-rise Building Zones in Figure 383 (on page 254) and in 'F. Richmond and Richmond Hill' (on page 255).	See response to Comment no. 1018.
1020	Fiona McDaniel, McDaniel Woolf	Policy 44. Design Process, Paragraph 22.9	<p>Pre-application</p> <p>C. It is recommended that all planning applications receive pre-application advice prior to submitting an application. How is this possible? Pre-applications do not have any timeframe for assessment, so especially for smaller projects and householder developments, a pre-applications can be extremely time wasteful and frustrating for all parties. It is quicker to simply submit a formal application, which is determined within 8 weeks and to use the feedback in the officer report for any subsequent application should there be a refusal. Also, the outcome of a pre-app is guidance only, and can be overturned at formal application.</p> <p>The previous duty planning officer system was a much better way of getting feedback. It was instant, it avoided the long and protracted need to write a report, the majority of the content of which was simply regurgitated policy anyway. Please can you reconsider reintroducing a duty planning officer meeting, potentially only for agents if it is impossible to open it up for everyone.</p>	The recommendation in Policy 44 that applicants participate in the Council's pre-application process is consistent with paras. 39-46 of the NPPF which encourages early engagement with the pre-application stage. Rewording of Part C to reference strong encouragement of developers engaging with pre-app,, and it is not a mandatory requirement, thus if an applicant is of the opinion that their scheme is of a scale or detail which would not benefit from pre-application advice, then the option remains open to them to submit the application for a decision as proposed. The Council's website does give advice on the pre-application service it offers, including expected timescales an applicant can expect to receive advice, which are currently shorter than the target timescales for determining a planning application. The Council has no plans to reintroduce a duty planning officer system. Whilst there may have been benefits in the past, it is not considered the most effective way of providing pre-application advice or providing value for

				money of the public purse for a number of reasons: the number of planning applications submitted is of a much greater number than previously; the complexity and level of expertise required of a planning assessment has broadened, to include greater consideration of ecology and sustainability for example, as well as new issues such as fire safety; pre-application includes internal consultation, where relevant, such as consultation of the Urban Design Officer or Council's flood risk assessor; pre-application includes a record of the advice provided; the pre-application system is a fee-based service which provides value for money for the public purse by accounting for the necessary officer time and resources. No further amendments to the policy wording are required.
-	Martin Ellis, South West London Clinical Commissioning Group (CCG)	Policy 44. Design Process	[See comment 863 in relation to design coding and healthy places]	Suggestion that the Council's public health team is involved in the local design coding process is noted; however, this is not a direct comment on the wording of the Local Plan/Policy 44 itself and so no amendments are required.
-		Policy 45. Tall and Mid-Rise Building Zones		
1021	Theresa Oddelm, The Royal Parks	Policy. 45 Tall and Mid-Rise Building Zones	Tall buildings around the Parks can have a significant adverse impact on their character. We welcome the inclusion of the protection of views and vistas towards heritage assets across the Borough as well as the protection of parks and would like to work with the Borough to specifically help protect the views from Richmond and Bushy Park.	Support for protection of views/vistas and parks noted. Part A.7 of the policy requires the massing of tall buildings to respect the proposals of their local environment, including parks, and Part A.3 refers to views and vistas and Policy 31. Views from Richmond and Bushy Park have been considered as part of the methodology which underpinned Arup's testing of tall building scenarios for zones identified in the Urban Design Study. The Royal Parks would also have the opportunity to comment on any future planning applications which may impact on the park. No amendments to the text are required.
1022	Alice Shackleton, on behalf of The Kew Society	Policy 45 Tall and Mid Rise Buildings	D : (mid-rise buildings may be permitted outside areas ear-marked for them) : this is concerning. Once developments such as Homebase are built then proposals in the vicinity and along the A316 will use that to argue for compliance with the requirements of C.	There may be some circumstances where mid-rise buildings will be considered appropriate outside of designated mid-rise building zones and Part C of the policy sets out the circumstances, including the need to comply with the criteria set out in Part C. Built and consented schemes in the nearby area is only one of a number of considerations which a proposal must take account of. The policy wording is considered to be sufficiently robust to allow for an assessment of the appropriateness of a mid-rise development outside of a designated zone. No amendments are required.
1023	Katie Parsons, Historic England	Policy 45 Tall and Mid-Rise Building Zones	Generally, we support this policy which is clear, comprehensive, and detailed. It reflects policy D9 of the London Plan and provides appropriate criteria to positively manage the conservation of the historic environment and consideration of local character. The definition for tall buildings is based on the findings from the Urban Design Study and seems appropriate for the prevailing nature of the borough. We also support the hierarchal approach that the plan adopts when it comes to increasing densities. The distinction between tall and mid-rise is positive and reinforces the London Plan's position which is that higher densities can be delivered through mid-rise development as a design and character-led alternative to tall buildings. We do have some minor comments on where the policy could be improved: <ul style="list-style-type: none"> • The policy requires development to "respect" vistas and views. This term however could be somewhat ambiguous, we advise that "avoids harm to" would be more effective. • The areas identified as appropriate on the maps in Appendix 3 are helpful, but the areas identified by way of "bubbles" and have imprecise boundaries which could cause confusion. The areas indicated also appear to have colour gradients, presumably showing where maximum heights should be located with heights (still falling within the plan's definition of "tall" are to step down. However, there is no key to indicate what the graded colour represented. Again, this could be ambiguous and may cause confusion. We recommend that appendix is amended to include a key or some explanatory text. 	General support for the policy noted. <p>The requirement to 'respect' local context is used throughout the Local Plan with regards to design and it is not considered that the word is ambiguous, particularly when read in context with the overall requirements of Policy 45 and other policies relating to design and heritage. No amendments are necessary.</p> <p>General support for the mapping in Appendix 3 is noted. Supporting text para. 22.20 states: 'Darker colours indicate more potential for height and the light colours indicate less potential for height'. An additional paragraph has been added to Appendix 3 to make clear the colour coding and to refer to the explanatory text accompanying the mapping in Section 4.6 'Tall and Mid-Rise Buildings' of the Urban Design Study. No further amendments are required.</p>
1024	Gary Backler, Friends of the River Crane Environment (FORCE)	Policy 45.Tall and Mid-Rise Building Zones	As with Policy 40, we would like to see the same criteria applied to the River Crane where appropriate as the draft Plan applies to Tall and Mid-Rise Building Near the River Thames Frontage. Appendix 3 shows that there are no Tall Building Zones within the Crane and DNR corridors, and that the only Mid-Rise Building Zone is The Stoop. We would oppose any further designations within the Crane and DNR corridors. Higher density development has disproportionate impacts on adjacent open spaces in terms of occupancy and wear-and-tear. <p>We are committed to protecting the vistas in the Borough's open spaces: much of the mental health benefit of open space derives from the sense of tranquillity and escape from urban pressures that the open space provides. This tranquillity and escape is compromised by the visual intrusion of structures, including residential housing blocks that are visible from the open spaces, particularly during the winter months of leaf-drop. FORCE also believes that any "view premium" should be a public benefit, available, through the absence of visual intrusion, to all users of the open space, rather than a private benefit accruing to the property developer through the premium pricing of housing units that enjoy open-space or river views. Any further intrusions would also run counter to the Council's own Policy 31 on Views and Vistas.</p>	London Plan Policy D9 part C (f) makes specific reference to buildings near the River Thames and therefore it is appropriate that this is reflected in the Local Plan. Development in Thames Policy Areas is also subject to specific policy guidance. Policy 45 Part C does reference the need for development to respect the local character, including consideration of adjacent watercourses, which would include the River Crane and Duke of Northumberland River (DNR). Any development proposal would also need to have regard to Policy 40, as well as other policies and guidance relating to design, views, vistas and open spaces (Policies 28, 31, 35 and 36). However, it is further noted that there are no tall building zones directly abutting these two tributary rivers. It is therefore not considered that Policy 45 requires a separate section specifically relating to the River Crane and DNR in the same way as the River Thames. <p>It is not clear what is being proposed via a 'view premium'. New residential development would be assessed against Policy 11 which requires a policy-compliant level of affordable housing, subject to viability. The value of and pricing of private units would be relevant to any viability appraisal. Policies 31, 35, 36 and</p>

				40 allow for assessment of the impact on open spaces and/or river views. No amendments to the text are required.
1025	Tim Catchpole, Mortlake with East Sheen Society	Policy 45.Tall and Mid-Rise Building Zones	We note the identification of tall building zones, a more detailed coverage of the visual impacts and spatial hierarchy; also mid-rise building zones both related to, and unrelated to, the tall building zones. Again, as mentioned above, we are not sure why this policy has appeared here at the end and not in the section on Local Character and Design Quality, as it does in the current Local Plan.	The adopted Local Plan contained a general policy on Building Heights; there is no specific policy in the current Local Plan 2018 for Tall and Mid Rise Buildings. The London Plan 2021 Policy D9 requires London Councils' Development Plans to include a definition of a tall building for all or parts of the borough and to identify locations as suitable for tall buildings. It is therefore appropriate that there is a separate policy in the draft Local Plan which addresses London Plan Policy D9, though adherence to Policy 28 would still be relevant. No amendments to the text are required.
1026	Melanie Gurney, The Planning Lab, on behalf of the Royal Botanic Gardens	Policy 45	In relation to Policy 45 (Tall and mid-rise building zones) and accompanying Appendix 3, RBGK have a particular interest in those zones in proximity to Kew Gardens, including F1 (Richmond Station), F3 (North Sheen) and G3 (Kew Retail Park). Appendix 3 specifies an appropriate height of 7-8 storeys for these prospective developments. RBGK request further information and justification on how these heights have been decided and tested to date. RBGK is strongly against any development that would have an adverse impact on the WHS. Therefore, the height benchmark is particularly important. If it is necessary to specify a maximum height (at all), we suggest these should be based on theoretical visibility testing, to obtain a general understanding of the potential visibility from these sites. Further, RBGK request that the wording is amended to ensure that this is a "maximum height", and only appropriate where fully justified through a tall building assessment; when demonstrated to not be out of character with the prevailing heights of the existing surroundings; and where there is no detrimental impact on the Outstanding Universal Value of the Kew WHS. RBGK support Part A(5) of this policy, and request that any future planning applications for these sites are supported by graphic 3D modelling, including Accurate Visual Representations, as well as lighting assessments to determine any impact on biodiversity, particularly during night-time hours. Finally, RBGK would ask that they are consulted on in relation to any future planning applications for these three sites.	The appropriate heights defined in the Urban Design Study have been tested using scenarios of hypothetical masterplan blocks in 3D, as shown in Appendix A of the Urban Design Study. The blocks have been inputted into Vu.City and a high level of townscape, visual and heritage assessment, alongside a Zone of Theoretical Visibility (ZTV), has been undertaken to understand the sensitivities of each particular area and the potential impacts. The methodology underpinning the Urban Design Study and identified Tall and Mid-Rise Building Zones is therefore considered to be robust and sound. For Richmond Station the analysis is presented on pp. 324-327 of the Urban Design Study 2021. This includes views from within Kew Gardens. The assessment concluded (p. 327) "with a maximum height of 8 storeys, development would generally not be apparent within wider views from the surrounding townscape, including the Old Deer Park and Kew Gardens. Mature trees would generally obscure the majority of visibility, and any upper parts of a development would be seen against the context of the rising landform of Richmond Hill rather than presenting a skyline feature..." Likewise for F3 North Sheen, a view from Vu.City is provided on p. 331 which shows that whilst the very top of the scenario may be visible from within Kew Gardens theoretically, this would be obscured by extensive tree planting. The assessment for G3 Kew Retail Park is provided on pp. 334-337. The ZTV undertaken indicated that the scenario would not be visible from within Kew Gardens. Whilst no amendments to the policy text are required, an amendment has been made to the Urban Design Study, as updated in 2023, to include the following wording in the assessment section for Richmond Tall Building Zone in Appendix A: "Any proposals should contain an appropriately detailed townscape, visual and heritage assessment of effects including any effects relating to Kew Gardens World Heritage Site." A further amendment has been made to the Kew Tall Building Zone in Appendix A to include the following additional text: "Views from Kew World Heritage Site, ...will need to be assessed as part of any tall building proposal." Royal Botanic Gardens Kew would be a statutory consultee for any future planning application which might impact on the World Heritage Site. No amendments to the policy text are required in this regard.
1027	Hannah Blunstone, CBRE on behalf of Rugby Football Union (RFU)	Policy 45.Tall and Mid-Rise Building Zones	Draft Policy 45 sets out the Boroughs definition for tall and mid-rise buildings in line with London Plan Policy D9: <i>"Buildings which are 7 storeys or over, or 21 metres or more from the ground level to the top of the building (whichever is lower) will be considered to be tall buildings. Buildings which do not trigger the definition of a tall building set out above, but are 5 storeys or over, or 15 metres or more from the ground level to the top of the building (whichever is lower) will be considered to be mid-rise buildings."</i> As currently worded, Part A of this policy states: <i>"A. 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 the London Plan Policy D9".</i> The RFU support the objective to provide a positive approach to accommodate growth across the borough, enabling tall buildings and higher density development in 'appropriate locations'. As currently worded, Part A suggests that if a proposal for a tall building is not within a specified zone, it will not be appropriate. However, recent case law confirms that tall buildings can be acceptable outside specified zones, provided they meet Part C of Policy D9 (which requires development proposals address the visual, functional and environmental impacts). We therefore suggest the following revised wording:	General support for the objective noted. The Urban Design Study is underpinned by a townscape character assessment of the entire Borough. It brings together a thorough understanding of the values, character and sensitivity of different parts of the Borough with an identification of potential development pressures. Please see the response to Comment 1026 regarding the methodology used to identify appropriate areas for tall buildings. The Study concluded that overall there are a few contained areas within the Borough which have capacity for tall buildings. Evidence and information to support the conclusions is contained in Appendix A. In some cases, areas were reviewed and considered for tall buildings but were found not to have capacity. Sometimes these have resulted in a mid-rise building zone and in other cases no mid-rise or tall building zone has been identified as being appropriate.

		<p>"A. Proposals for tall buildings will only be appropriate in tall building zones identified on the Policies Map and in Appendix 3, <i>and/or</i> where the development would not result in any adverse visual, functional, environmental or cumulative impacts, having regard to all criteria set out in the London Plan Policy D9".</p> <p>Further to the above, we consider that the portion of SA13 to the north of the Stadium, which is less sensitive in townscape terms should be included in the Appendix 3 Tall/Mid Rise Building zones.</p> <p>[See also comment 522 on Design Objectives)</p>	<p>Para. 31 of the NPPF 2021 states that the preparation and review of all policies should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned. Policy 45 provides a clear approach for where the principle of tall building development would be appropriate, via specific locations set out in the delegated zones. These zones are identified on maps with a clear policy that tall building outside of these areas will not be acceptable, and that within these zones proposals would need to meet the specified criteria. The supplementary definition of mid-rise building zones provides additional clarity by setting out appropriate heights expressed as a range using heat style map visualisation.</p> <p>Policy 45 is considered to be in general conformity with London Plan Policy D9 whilst also seeking to make it specific and appropriate to the Borough, having regard to the local evidence and environment, as set out in Arup's Urban Design Study. The Urban Design Study is a robust design-led evidence base document which establishes a comprehensive understanding of the context and policy background, in national policy and design guidance. The height parameters for Tall and Mid-Rise Building Zones are based on a characterisation process which is informed by industry guidance set out by the Landscape Institute, Natural England and the GLA. The methodology is refined to suit the particular characteristics and constraints of the borough. This process informed an assessment for the capacity for growth by assessing the sensitivity of character areas to establish high sensitivity areas unlikely to have capacity for development without adverse effects on the townscape, alongside areas of medium and low sensitivity with the potential for targeted or larger scale growth. Simultaneously, the 'probability' of change is assessed, analysing the borough in terms of aspects such as public transport accessibility, land availability and planning policies. Sensitivity and probability are considered together to understand the potential development capacity of the borough.</p> <p>The appropriate heights defined within the Study follow the same methodology as the Urban Design Study for the London Borough of Wandsworth. During the Local Plan Examination (November 2022), the Inspectors appeared to consider the Study as a robust and credible evidence base to the design-led policy on tall and mid-rise buildings. Whilst (at the time of writing) the Inspectors' report on the Wandsworth Local Plan is awaited, the approach in the Study recognises the necessary strategic scale of the analysis undertaken for each of the tall building zones, given that it is a borough-wide study. The methodology for defining the tall building zones and appropriate heights has been developed in discussion with the GLA to ensure the approach is in accordance with London Plan Policy D9. In their response to the Reg 19 consultation on the Wandsworth Local Plan, the GLA was supportive of the locational approach of the building zones in Policy LP4 of the Wandsworth Local Plan: <i>'...We further welcomes the clear approach regarding the specific locations of such tall buildings, being those set out on in designated zones (clearly indicated on maps in an appendix to the plan) with a clear policy that tall buildings outside of these areas will not be acceptable – and that within these zones proposals need to meet the specified criteria.'</i> Regarding B part 2 of London Plan Policy D9 the GLA response was likewise supportive: <i>'Appendix 2 sets out clear appropriate heights in metres and storeys – expressed as a range, using a heat-map style visualisation to express appropriate heights within a range. This is clear and is supported.'</i></p> <p>In determining a planning application, the Council has regard to the Local Plan as a whole and the requirements of Policy 45 would form part of that consideration. Policy 45 creates clarity around what are appropriate zones and what will be considered appropriate heights across the Borough. It is not considered that Policy 45 is an absolute restriction on submitting an application for a tall building outside of a tall building zone in the Borough. If an application is submitted which does not comply with Policy 45, this would be a departure from the Local Plan and the onus would be on the applicant to clearly identify and justify how any wider planning benefits of the scheme would outweigh harm, as part of the planning balance. However, it is considered that providing a policy on maximum heights based on zones provides a clear direction for applicants, developers, the</p>
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				<p>community, Council officers and other members of the decision-makers of the Council. The evidence base for the Policy is considered to be underpinned by a robust and proportionate methodology, and consequently Policy 45 considered to be justified and sound. No amendments to the text are required.</p> <p><u>The Stoop</u> Character Area C2 Twickenham Residential is identified in the Urban Design Study as overall having a high sensitivity to change. Twickenham Stadium and its surrounds (and the Stoop) is described as forming “discrete areas standing in contrast to the mostly low-lying, residential setting”. It is identified that in these areas there may be opportunities to accommodate growth and change, where these “take opportunities to improve negative qualities and are designed sensitively to respect and enhance existing character”. The Site Allocation for Twickenham Stadium states that building heights will be expected to step down from the stadium towards the boundary to respect the existing low-rise of the surrounding area. Part of the north area of the stadium is designated MOL and the remainder directly abuts this. Given the constraints and sensitivities, it would not be appropriate to include this area as a Tall and Mid-Rise Building Zone, noting too that Policy 45 does not preclude a mid-rise development from coming forward outside of a designated zone, subject to compliance with Part C of the policy. No amendments to the text area required.</p> <p>See also response to Comment 522 regarding the Twickenham Stadium Site Allocation.</p>
1028	Katy Wiseman, National Trust	Policy 45 Tall and Mid-Rise Building Zone	<p>We support the principle of Policy 45 Tall and Mid-Rise Building Zones which seeks to limit tall to medium sized building heights to restricted zones which have been formulated through an evidence-based approach to plan-making. We therefore support criterion 7 within the Spatial Hierarchy that will prohibit tall buildings outside of the identified Tall Building Zones. As owners of Ham House, a significant grade I listed building within the borough, we particularly support criterion 1 within Visual Impacts which requires tall buildings to respect the views and vistas towards heritage assets across the borough, and criterion C2 for Mid Rise Buildings which requires proposals to respond positively and protect the setting of existing buildings in the surrounding area, including heritage assets. We suggest strengthening policy wording by changing policy wording to read: C2 ‘respond positively and protect the setting of existing buildings in the surrounding area, including heritage assets and their setting’.</p> <p>Changes considered necessary: We suggest strengthening policy wording by changing policy wording to read: C2 ‘respond positively and protect the setting of existing buildings in the surrounding area, including heritage assets and their setting’.</p>	<p>General support for the principle of Policy 45 noted.</p> <p>An amendment has been made to include ‘and their setting’ to the reference to heritage assets in Part C2 of the policy.</p>
1029	Charlotte Orrell, DP9 Ltd on behalf of London Square Developments	Policy 45 - Tall and Mid Rise Buildings	<p>London Plan (2021) Policy D9 states that Development Plans should define what is considered a tall building for specific localities based upon local context and should not be less than 6 storeys or 18m. Draft Local Plan Policy 45 sets out the Councils definition of a tall building in the borough, as ‘buildings which are 7 storeys or over, or 21 metres or more from ground level to the top of the building’. The Council however also include a definition of ‘mid-rise’ buildings, separate to the London Plan requirements, which are classified as building that ‘are 5 storeys or over, or 15 metres or more from the ground level to the top of the building (whichever is lower)’. The accompanying subtext justifies the additional definition due to the low-rise nature of the borough and the ability for mid-rise buildings to be substantially taller than their surroundings.</p> <p>The building height categorisations are supported by the Urban Design Study (2021) which forms an evidence document for the draft Local Plan. This provides an analysis of character of areas and provides suitable locations for both tall and mid-rise buildings. The Greggs site is not included within either categorisation and thereby excluded within the areas deemed appropriate for tall or mid-rise development within Picture 22.1 of the draft Local Plan.</p> <p>The refused August 2020 scheme for the Site proposed a mix of building heights rising to 5-storeys across the Site. As noted above, this application was refused primarily on the basis of loss of industrial floorspace, whilst Officers supported the proposed design, scale and massing. In concluding the acceptability of 5-storeys on the site, Officers referred to the to the approved Lockcorp House development adjacent which was allowed on appeal in June 2020 (LPA Ref. 19/2789/FUL). Specifically Officers noted that: <i>‘The proposed four and five storey buildings toward the northern side of the site are similar in scale to Lockcorp House in relation to their height. This building was allowed on appeal on 18 June 2020 for a five-storey building...It is acknowledged that construction of this building has not yet begun, however it provides a strong point of reference as to what may be considered acceptable in terms of height in this area.’</i></p> <p>The support for 5-storey development on the Greggs Site is also reiterated within the Urban Design Study (2021) which states in regards to the refused scheme that: <i>‘The scheme layout reflects the scale and massing of the surrounding streets, with townscape typology creating a new mews and a step up in scale to match the adjacent industrial building.’</i></p> <p>The acceptability of a 5-storey building on the Site has therefore been confirmed by Officers as part of the refused planning application and within the Urban Design Study. On this basis the appropriateness of a 5-storey development on the Site has been</p>	<p>The Greggs site has been assessed as having a low probability of change, largely due to its designation as a Key Business Area and Locally Important Industrial Land and Business Park (part of the West Twickenham cluster). It is also assessed as having a high sensitivity to change and a lower capacity for change. There is therefore no evidence in the Urban Design Study to indicate that a mid-rise zone should be defined in this area. Nevertheless, as the policy for mid-rise zones acknowledges, there may be opportunities for buildings 5-6 storeys outside of mid-rise zones at a site-specific scale, and particularly as individual buildings which form part of a wider predominantly low-rise masterplan, depending on surrounding context. Policy 45 recognises that proposals for mid-rise buildings may be considered suitable outside tall and mid-rise building zones. In light of the above, it would not be appropriate to include the site as a mid-rise zone and there is no requirement to amend the text/picture accordingly.</p>

			established, and the Greggs site should therefore be included within Picture 22.1 as an area suitable for mid-rise development within the Local Plan.	
1030	Neil Henderson, Gerald Eve on behalf of Reselton Properties	Policy 45 - Tall and Mid-Rise Building Zones	Policy 45, Sub Section A- The policy as drafted is too prescriptive and gives no opportunity for consideration of detailed design being able to influence the extent to which a location is capable of being able to accommodate a tall building. This is particularly the case when identifying individual areas for a mixture of tall and mid-rise zones. The precise location within the zones for tall buildings should be subject to detailed design and consideration against the tall buildings policy framework of D9. It is therefore suggested that the drafting should be amended as follows "Proposals for tall buildings will NORMALLY only be appropriate in tall building zones". Appendix 3 and the Policies Map do not appear to have been issued for consultation so we reserve the right to comment further on the issue at Reg 19 Stage.	See response to comment 1027 regarding Policy 45. Appendix 3 and the proposed changes to the Policies Map were available for consultation as part of the overall Regulation 18 consultation (and comments have been received in response).
1031	George Goodby, Environment Agency	Policy 45.Tall and Mid-Rise Building Zones	Point B of this policy should recognise the biodiversity value of setting tall buildings back from the river. Tall buildings should be set far enough back to prevent shading of the river. This is so any buffer zone has sufficient sunlight to allow the ecosystem of the river corridor to function. Proposals for tall buildings close to a river should be submitted with a Transient Overshadowing analysis, demonstrating overshadowing throughout the year and at various points during the day.	Part B of Policy 45 requires the design of tall buildings to maintain the river frontage as a public resource and to be set back. Impacts of the development on rivers and their ecosystems can be assessed under Policy 40. Rivers and River Corridors Part A which states an expectation that development adjacent to the river corridors contributes to improvements and enhancements to the river environment, including, inter alia, the creation of new habitats. Criteria 5 of Part F also requires the setting back of development from river banks. Any relevant planning application would also be assessed against Policy. 39 Biodiversity and Geodiversity which seeks to protect biodiversity from inappropriate development, in line with the Richmond Biodiversity Action Plan. The text of Policy 39 has also been amended to reference dark spaces, that are important for some species, and to specifically cite blue links (as well as green). Policy 42. Trees, Woodland and Landscape may also be relevant for any impact on trees and their surroundings - ensuring appropriate planting and avoiding any detrimental impacts. It is therefore considered that there is sufficient reference in the Local Plan to enable an assessment of the impact of a tall building on rivers' ecosystems and no further amendments are necessary. The submission of a Transient Overshadowing analysis could be requested as part of the planning application process in line with the policy requirements set out above, where deemed relevant.
1032	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	Policy 45.Tall and Mid-Rise Building Zones	The wording of the Policy 45 needs to be substantially amended to omit any reference to the acceptability of development above five storeys (15 m.) in height anywhere in Character Areas F1, F2, F3 and G1 – whether defined as a 'Tall' or 'Mid-rise' buildings Accordingly, diagrams 27.21 and 27.22 – Richmond Station: Tall Building Zone and Mid-Rise Zone, and diagrams 27.24 and 27.25 – North Sheen (Lower Richmond Road and Homebase Sites): Tall Building Zone and Mid-rise Zone, in Appendix 3: Tall and Mid-rise Building Zones, need to be omitted or substantially amended, and the Policies Map adjusted accordingly. Such a policy would properly reflect the very maximum height of existing development across Character Areas F1, F2, F3 and G1 and in most other areas within the Borough. The highly contentious proposed policy of acceptance of 'Tall buildings and Mid-rise Zones development rising above five storeys (15 m.) would appear to be drawn from the design guidance contained in Sections 4.6, 5.2 and 5.5 and Appendix A of Arup's Urban Design Study, parts of which reflect a fundamentally flawed analysis and appreciation of the area, including parts of Sections A.3* and B.6, Figure 383 – Richmond and Richmond Hill Tall and Mid-rise Buildings Zone map (on page 254) and the diagrams under the heading 'F. Richmond and Richmond Hill' relating to the Richmond Station, the Homebase and Lower Richmond Road Sites (on page 255). * In particular the text and diagrams for the Richmond Station, Lower Richmond Road and North Sheen (Homebase) Sites contained under Tall Building Zone Place F for Richmond and Richmond Hill on pages 324 to 327. Finally, the highly questionable claim made in paragraph 22.12 of the supporting text for Policy 45 to the effect that 'Tall buildings can make a crucial, positive contribution to good design as well as providing densities supporting scheme viability, maximising the delivery of affordable housing and optimising the use of land' has no relevance at all to the existing urban character of Richmond, its sustainable development, its enhancement or the provision of 'affordable housing' for Londoners – let alone the delivery social housing. In this connection, it is significant that some of the highest density of housing in the Richmond area and other areas of London developed over the last one hundred and thirty years has been secured in developments rising to no greater than four or five storeys in height.	See response to comment 1030 with regards the methodology underpinning the Urban Design Study, which is considered to be robust and sound. <u>Richmond Station</u> -The Urban Design Study 2021 has identified the site as having capacity to accommodate buildings of up to 7-8 storeys. The text on p.255 highlights that the opportunities for the tallest heights are within parts of the zone, and that buildings should step down to the surroundings, as indicated by the heat map and surrounding mid-rise zone. -The character profile on p.158 notes that there is an underwhelming sense of arrival at the station. -The design guidance on p.297 states that main roads may be able to accommodate taller buildings if stepped back. It also recommends the sense of arrival and quality of the public realm at the station could be enhanced. -The strategy for the area is to conserve and enhance the identity of specific areas (notably around the station) and the functioning of the area as a town centre. -The assessment in Appendix A on p.325 provides a rationale for the appropriate heights identified. A scenario was tested on the site, which was developed in the context of providing active ground floor uses, respecting the height of the existing locally listed station building, setting the taller element back behind the primary frontage and noting there is potential for a new development to serve as a landmark gateway marking the arrival point in Richmond. The existing commercial building to the south of the station is 5 storeys (and 6 storeys to the east where the ground level drops). -A ZTV was produced to test the potential visibility of the scenario heights and a high level townscape, visual and heritage assessment was undertaken. The assessment concludes that there 'is potential for some additional height, but only where this is substantially set back within the plot and away from the road frontage'. -The assessment notes the tall building zone is limited by the many sensitivities including the locally listed station building itself, other nearby locally listed buildings on the Quadrant and the small-scale residential character of properties to the south-east and north-east. It is therefore considered that the current wording is appropriate and no further changes are required.

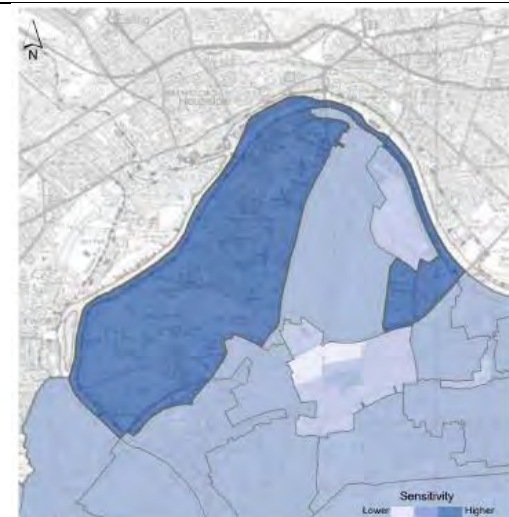
				<p>North Sheen The Urban Design Study 2021 has identified the two sites at Lower Richmond Road, North Sheen as having capacity to accommodate buildings of up to 7-8 storeys. The UDS provides a summary of the tall building zone on p.255 where it notes that a development of up to 11 storeys has been consented on the site. However, the analysis of the UDS concludes that: <i>'if the site should come forward again in the future, the recommendations from this study are that appropriate heights for the zone are up to 8 storeys to respect the small scale of the surrounding area. There are opportunities for some height within parts of the zone, although any development should assess any potential impact on views and amenity...'</i></p> <p>The UDS has undertaken a high level townscape and visual assessment using a scenario, as set out in Appendix A. The assessment concludes that <i>'the existing character and scale of the site provides opportunity for a development that could positively enhance the character of the area...'</i> It also concludes <i>'Whilst the blocks of up to 8 storeys as illustrated in the scenario are not considered to adversely affect character and views, they are noticeably taller than surroundings... Heights in excess of this may therefore give rise to unacceptable impacts owing to the relationship of the surrounding small scale urban grain and semi-suburban character...'</i></p> <p>The set back of taller elements within the site is important to ensure there is not awkward juxtaposition between smaller scale terraces on Manor Grove. A number of visuals from Vu.City underpin the testing to illustrate the relationship of 8 storey elements with their surroundings. It is therefore considered that the current wording is appropriate and no further changes are required.</p> <p>The statement that <i>'Tall buildings can make a crucial, positive contribution to good design as well as providing densities supporting scheme viability, maximising the delivery of affordable housing and optimising the use of land'</i> is considered to be accurate. With regards to existing townscapes, there is provision within the Policy for assessment to ensure that development respects the prevailing character. No amendments are considered necessary.</p>
1033	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	General comment (in relation to high rise development)	We are deeply concerned at the support given for high rise development at the Richmond Station and comment on Site Allocation 24 Richmond Station, 28 Homebase and 29 Sainsbury's and Policy 45 Tall and mid-rise Building zones . [See comments 596, 609, 616 and 1032]	See responses to comments 50594, 96, 609, 616 and 1032. No further amendments are required.
1034	Peter Willan and Paul Velluet, Old Deer Park Working Group	General comment (in relation to high rise development)	We are concerned at the support given for high rise development at the Richmond Station and elsewhere given the potential for interrupting views and vistas that are so important to the Old Deer Park. We comment on Site Allocation 24 Richmond Station and Policy 45 Tall and mid-rise Building zones . [See comment 1035]	See response to comment 1032 with regards to Richmond Station. Figure 424 on p. 327 of the Urban Design Study 2021 provides an illustrative view from Vu.City illustrating the potential visibility from within Old Deer Park. Whilst the upper parts of an 8 storey building would be visible in a bare earth view, in reality it would be largely screened by trees and vegetation around the park. No amendments to the text are required.
1035	Peter Willan and Paul Velluet, Old Deer Park Working Group	Policy 45.Tall and Mid-Rise Building Zones	<p>The wording of the Policy 45 needs to be substantially amended to omit any reference to the acceptability of development above five storeys (15 m.) in height anywhere in Character Areas F1, F2, F3 and G1 – whether defined as a 'Tall' or 'Mid-rise' buildings. Accordingly, diagrams 27.21 and 27.22 – Richmond Station: Tall Building Zone and Mid-Rise Zone, and diagrams 27.24 and 27.25 – North Sheen (Lower Richmond Road and Homebase Sites): Tall Building Zone and Mid-rise Zone, in Appendix 3: Tall and Mid-rise Building Zones, need to be omitted or substantially amended, and the Policies Map adjusted accordingly. Such a policy would properly reflect the very maximum height of existing development across Character Areas F1, F2, F3 and G1 and in most other areas within the Borough. The highly contentious proposed policy of acceptance of 'Tall buildings and Mid-rise Zones development rising above five storeys (15 m.) would appear to be drawn from the design guidance contained in Sections 4.6, 5.2 and 5.5 and Appendix A of Arup's Urban Design Study, parts of which reflect a fundamentally flawed analysis and appreciation of the area, including parts of Sections A.3* and B.6, Figure 383 – Richmond and Richmond Hill Tall and Mid-rise Buildings Zone map (on page 254) and the diagrams under the heading 'F. Richmond and Richmond Hill' relating to the Richmond Station, the Homebase and Lower Richmond Road Sites (on page 255). * In particular the text and diagrams for the Richmond Station, Lower Richmond Road and North Sheen (Homebase) Sites contained under Tall Building Zone Place F for Richmond and Richmond Hill on pages 324 to 327.</p> <p>Finally, the highly questionable claim made in paragraph 22.12 of the supporting text for Policy 45 to the effect that 'Tall buildings can make a crucial, positive contribution to good design as well as providing densities supporting scheme viability, maximising the delivery of affordable housing and optimising the use of land' has no relevance at all to the existing urban</p>	Please see responses to comments 1030 and 1032 regarding the Urban Design Study methodology, Richmond Station, North Sheen and tall buildings' impact on townscape. No amendments to the text are necessary.

			character of Richmond, its sustainable development, its enhancement or the provision of 'affordable housing' for Londoners – let alone the delivery social housing. In this connection, it is significant that some of the highest density of housing in the Richmond area and other areas of London developed over the last one hundred and thirty years has been secured in developments rising to no greater than four or five storeys in height.	
1036	Councillor Richard Warren	Policy 45. Tall and Mid-Rise Building Zones.	I am wholly opposed to designating North Sheen as a location suitable for tall buildings. In 2019, Richmond Council followed planning officers' recommendations to refuse permission for a nine-storey block at the Homebase, Manor Road site, so it is not clear why the council would now sanction eight-storey blocks in this same location. An eight-storey building would only be marginally less overbearing than a nine-storey building. I would imagine it would still be visible from conservation areas and would cut out light from neighbouring homes. This is especially so, as the plan envisages an eight-storey building on the edge of the current Homebase, Manor Road site, where it would loom over cottages and mid-rise buildings on the opposite side of the railway tracks.	<p>The Urban Design Study 2021 has identified the two sites at Lower Richmond Road, North Sheen as having capacity to accommodate buildings of up to 7-8 storeys. The UDS provides a summary of the tall building zone on p.255 where it notes that a development of up to 11 storeys has been consented on the site. However, the analysis of the UDS concludes that: <i>'if the site should come forward again in the future, the recommendations from this study are that appropriate heights for the zone are up to 8 storeys to respect the small scale of the surrounding area. There are opportunities for some height within parts of the zone, although any development should assess any potential impact on views and amenity...'</i></p> <p>The UDS has undertaken a high level townscape and visual assessment using a scenario, as set out on p.329-331. The assessment concludes that <i>'the existing character and scale of the site provides opportunity for a development that could positively enhance the character of the area...'</i> It also concludes <i>'Whilst the blocks of up to 8 storeys as illustrated in the scenario are not considered to adversely affect character and views, they are noticeably taller than surroundings... Heights in excess of this may therefore give rise to unacceptable impacts owing to the relationship of the surrounding small scale urban grain and semi-suburban character...'</i></p> <p>The set back of taller elements within the site is important to ensure there is not awkward juxtaposition between smaller scale terraces on Manor Grove.</p> <p>A number of visuals from Vu.City are presented to illustrate the relationship of 8 storey elements with their surroundings.</p> <p>No amendments to the text are required.</p>
1037	Nick Alston, Avison Young on behalf of St George Plc and Marks & Spencer	Evidence Base – Urban Design Study (2021)	<p>The Urban Design Study (the "Study") has been prepared by Arup, on behalf of the London Borough of Richmond upon Thames ("LBRuT"). It was published on 9th December 2021.</p> <p>Arup also drafted the Urban Design Study for the London Borough of Wandsworth ("LBW"), prepared and published in December 2020 to support the borough's Local Plan. The LBW Local Plan is in the final stages of the adoption process, having published a Regulation 19 Draft of their Local Plan, with consultation due to end in February 2022. As the LBW local plan is further advanced than the LBRuT, having responded and incorporated changes to their Regulation 18 draft, it provides a useful comparison when assessing the evidence base used in relation to the LBRuT Urban Design Study (2021) and the consequent drafting of planning policies set out in the borough's Regulation 18 Draft Local Plan.</p> <p>Studies and Supplementary Planning Documents (adopted and in draft) prepared by other London planning authorities, specifically concerning the development of tall buildings also provide further opportunities to compare the detail of supporting evidence base used across London and setting parameters for future tall building development.</p> <p>This section is structured in the following way:</p> <ol style="list-style-type: none"> 1. We describe the structure of the Urban Design Study (2021); 2. We provide a commentary on the Study's content, focussing on the soundness of the supporting evidence data; and 3. Analysis of the Kew Retail Park. <p>We provide a summary of the methodology and logic flow of the Study because it sets out the basis for drawing conclusions about where tall buildings are likely to be acceptable in the future. That methodology is crucial in understanding the soundness of the evidence base.</p> <p>(1) Structure of the Technical and Baseline Study</p> <p>Sections 1 to 3 of the Urban Design Study (2021) provide an introduction to the LBRuT, as well as provide an overview of the methodology which underpins the evidence base. It includes a summary of the borough's built and ecological environment, as well as townscape character assessments for identified areas, separated into sub-character areas within wider areas known as "Places". Character assessments for each "area" include a brief overview of key local characteristics, the identification of valued and negative features, building typologies, concluding with a sensitivity value, outlining the appropriateness for change/development within the area.</p> <p>Section 4 identifies capacity for growth within each identified sub-character area, providing a high-level evaluation of the potential for growth across the borough. The capacity for growth of an area is specifically concerned with the potential for tall buildings within the borough, utilising the assessment set out within the character assessments in Section 3.0 of the Study as a supporting evidence base. To inform an area's capacity for change, Sensitivity to Change and Probability of Change are calibrated using a matrix (Figure 2.3 of this note) [see below] in order to determine the 'Development Capacity' for an area. Such</p>	<p>General support for the methodology underpinning the Urban Design Study and the principle of identifying tall building zones is noted.</p> <p><u>Character area boundary</u></p> <p>Character area boundaries are, in reality, zones of transition and are rarely hard lines on the ground. West Park Avenue does have similarities in character to the adjacent G2 Kew Residential. However, this and surrounding streets are less consistent in terms of layout and quality than G2. It is considered that the A205 provides a logical and clear boundary between the two character areas and encompasses areas of mixed heights, uses, grain and layout to the north of it. The character area boundaries have been subject to public consultation and no comments were received on the suitability of this particular character area boundary.</p> <p><u>Negative qualities</u></p> <p>The Urban Design Study 2021 p.178 summarises the area as: <i>'it has a coarser urban grain than the surrounding regularly laid out residential streets of Kew Residential'</i>. P.166 also states: <i>'Coarse urban grain which contrasts with the surrounding regular streets of Kew Residential'</i> as a key characteristic of the area. The Urban Design Study has been amended to add the following to the negative qualities: "Poor architectural quality of commercial buildings within Kew Retail Park; Large expanses of car parking within Kew Retail Park." It is considered that the other negative qualities suggested are already captured in the list of negative qualities or elsewhere in the key characteristics. No further amendments are required.</p> <p><u>Valued qualities</u></p> <p>It is not considered necessary to remove any valued qualities from the Urban Design Study.</p> <p><u>Design guidance</u></p>

		<p>conclusions and quantitative figures are then used for the identification of 'Tall Building Zones', also identified and set out in Section 4 of the Study.</p> <p>Section 5 of the Study provides general design guidance for the borough, including guidance for design of tall buildings, small sites and riverside areas. Here, the Study provides specific design guidance concerning each sub-character area, setting out a 'Character Strategy' for each area, identified on a sliding scale identifying a broad strategy for forward planning and future management.</p> <p>Appendix A provides the supporting evidence and justification for the identified heights for each 'tall building zone'. Appendix B sets out a detailed description of the methodology underpinning the Study. A review of relevant Planning Policies and an overview of the design quality of ten recent developments within the borough is located in Appendix C, whilst Appendix D contains an overview of predominant building typologies within the borough.</p> <p>Proformas informing character assessments are laid out in Appendix E, whilst a summary of public consultation undertaken is laid out in Appendix F. This completes the Study.</p> <p>(2) Detailed Commentary</p> <p>We find the general underlying principles of the Study sound and well justified. We support the need to identify specific locations for tall building development within the borough, in line with Policy D9 (Part B) of the London Plan 2021, and we agree with the general findings that Richmond and its surrounding environs needs a positive framework for development in consideration of the significant housing pressures facing the Borough. Carefully planning for growth and ensuring development responds to local context underpins good plan-making. The general philosophy of the Study supports this approach and is welcomed.</p> <p>We agree with the approach and adopted methodology set out in detail in Section 4, supported by a relatively comprehensive evidence base in Appendix B. This approach is the same methodology set out in the Urban Design Study prepared by Arup to support the LDW Draft Local Plan (now at Regulation 19 stage) and is based on the accepted and well adopted framework for assessment of townscape and visual effects, set out in the Guidelines for Landscape and Visual Impact Assessment (Third Edition) 2013. The methodology underpinning the Study is therefore considered to be sound. It must be noted that the LBW Draft Local Plan is yet to be found sound, though at Regulation 19 stage, it has benefitted from Regulation 18 consultation.</p> <p>Whilst we agree within the underpinning methodology applied to inform the findings of the Study, we disagree with Arup's conclusions in relation to 'Sensitivity to Change', 'Probability of Change', which link directly to the 'Development Capacity' of an area – as set out in the matrix at Table 1 on Page 234 of the Study (see Figure 2.3). This is relevant in relation to the Kew Retail Park site and wider East Kew Mixed Use Character Area (Area G3).</p> <p>Further to the implementation and application of the supporting methodology, we are concerned with the lack of detail set out in the supporting evidence data, particularly that used to underpin policies defining where tall and mid-rise buildings are considered appropriate. We have further concerns with the identification of 'Tall Building Zones' which identify specific scales of development, which, when coupled with a cursory analysis of the surrounding townscape character of the area, is not justified and considered unsound. We cover each point in detail below, with specific reference to Sub-Character Area G3: East Kew Mixed Use Area, as well as Kew Retail Park.</p> <p>Evidence Data</p> <p>Page 178 of the Study comprises an overview of the townscape character of the East Kew Mixed Use Area (identified at Figure 2.1). The Study states that the East Kew Mixed Use area (Area G3) has a 'mix of features, but lacks a cohesive layout', and that the area 'lacks identity, with little obvious relationship with its geographic context, including the adjacent River Thames'. Whilst we generally agree with the findings of the townscape character assessment of the area, we have concerns with the level of detail provided and question its ability to support the parameters set out in draft policies within the LBRuT Draft Local Plan. We question its ability to support references to specific scales of development, along with set limitations on height and massing, as set out within the current draft Site Allocations and the wider Place-based Strategies.</p> <p>The notion that the Study is not supported by a sufficient and well-informed assessment is endorsed by introductory text at Page 17, which states: 'The Study is intended to be an overview, rather than a detailed analysis'</p> <p>Additionally, in relation to the sensitivity assessment, the Study states:</p> <p>'It should be noted that the sensitivity assessment has been undertaken at a borough-wide scale and is therefore necessarily broad-brush in its application. Within each of the areas identified there may be specific sites with a high or lower sensitivity than illustrated.'</p> <p><i>Figure 2.1: East Kew Mixed Use Character Area Plan. Figure 278 of Arup's Urban Design Study (2021)</i></p>	<p>The guidance on landscaping and connectivity to the river are considered to be relevant and appropriate aspirations. No amendments to the text are required.</p> <p><u>Lack of assessment/reference to existing tall buildings</u> Existing tall buildings in the borough are mentioned in relation to G3 on p. 166 of the Urban Design Study: 'The development around the National Archives and Kew Retail Park is entirely post war in age, and buildings are generally larger blocks and of equivalent heights of around 4-7 storeys. Kew Retail Park reaches up to a maximum height of 23m with large floorplate stores and surrounded by expansive surface car parking.' Existing tall buildings are also illustrated on Fig 372 p.237 of the Urban Design Study. Consented tall buildings are described in the text on p.237. No amendments are necessary.</p> <p><u>Tall building zones</u> The Urban Design Study identifies appropriate locations for tall buildings based on the evidence in the character profiles which is comprehensive, and based on a combination of desk study, field survey and consultation. The UDS explains how the zones have been identified in the methodology and with reference to the overall development strategy, considering the constraints and opportunities identified. The study is considered to provide a proportionate evidence base to justify the zones, and the process is clearly set out in the report. Please also see response to comment 1030. No amendments are required.</p> <p><u>Kew Biothane Plant redevelopment</u> The Kew Biothane Plant redevelopment is mentioned in the Urban Design Study as noted in the comment. Heights are proposed as 6 storeys (with the top 2 storeys set back). Whilst consented developments influence the assessment of appropriate heights, they do not affect the probability and development capacity analysis as set out in the methodology. No amendments are required.</p> <p><u>Sensitivity</u> Sensitivity is not simply a numeric comparison of positive versus negative qualities; rather it is a qualitative analysis considering value and susceptibility as described on p.356 of the methodology section of the Urban Design Study. Particular sensitivities are highlighted in the summary of the character profile as the area's proximity to the River Thames and the open spaces. Additional text added on sensitivity has been added to include: <i>"Particular features of sensitivity include: The character of, and views to and from, the River Thames corridor; Landscape and open spaces including the allotment; Surrounding low rise houses within the character area as well as within the adjacent Kew Residential character area, and including the nearby Ruskin Avenue & Defoe Avenue Conservation Area; The location of the character area within the wider context of the Royal Botanic Gardens Kew World Heritage Site, meaning that taller development may affect views from Kew; The setting of, and views from, the opposite river bank within LB Hounslow."</i> No amendments are necessary.</p> <p><u>Probability</u> Other factors also influence probability including PTAL (Public Transport Accessibility Level), for which the site rates relatively poorly, as set out in the methodology. No amendments are required.</p> <p><u>Kew Biothane</u> The reference in the Urban Design Study 2021 to Kew Biothane as a consented tall building has been removed on p.237 as it is not a tall building.</p> <p><u>Design guidance</u> It is not considered that there are any conflicts with the guidance set out in the London Plan. No amendments are required.</p> <p><u>Scenario</u></p>
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		 <p>In relation to the East Kew Mixed Use character area (Area G3), the identified area includes West Park Avenue. Given that this is area is more similar in character to Kew Residential (Area G2), we would suggest that the boundary is amended to better reflect the distinction between these character areas. A revised boundary could run along the Kew Meadow Path which naturally separates the Kew Retail Park site and West Park Avenue with mature trees of significant height. Everything to the south of West Park Avenue should remain in the East Kew Mixed Use area (Area G3).</p> <p>The assessment of the East Kew Mixed Use area (Area G3) sets out a high-level summary of the townscape characteristics of the area. This is essentially an overview, highlighting overarching features of the area's townscape character, including a short list of positive and negative townscape features. Negative features for the character area are identified within the Study at Page 180. These are identified as the following:</p> <ol style="list-style-type: none"> 1. Lacks coherence in layout, which gives the townscape poor legibility; 2. Lack of character and sense of identity; 3. Impermeable boundaries and blurred divisions between public and private space makes the area feel unwelcoming in places; 4. Poor relationship with and connectivity to the Thames corridor, from which it seems disconnected; 5. Mortlake Road (A205) forms a busy, southern boundary with little sense of place. <p>From undertaking our own assessment of the East Kew Mixed Use Area (Area G3), whilst we agree with the negative townscape features identified by Arup and set out above, we would go further in our assessment of the area, adding that the area:</p> <ol style="list-style-type: none"> 6. Is divorced from the high quality, residential townscape area of Kew Residential (Area G2); 7. Has a coarse Urban Grain that starkly contrasts with the local context which is largely suburban speculative terrace housing together with large format buildings such as the National Archives; 8. Poor architectural treatment of large commercial buildings within Kew Retail Park; 9. Large areas of hardstanding associated with the Kew Retail Park; and 10. High levels of vehicular traffic associated with the Retail Park. <p>As outlined in points 6-10 above, we consider the East Kew Mixed Use area is divorced from its surroundings' locality, particularly the superior townscape quality of the Kew Residential Area (Area G2) and the River Thames to its north-east.</p> <p>Within their study, Arup identify five Valued features of the area (Page 180). These are as follows:</p> <ol style="list-style-type: none"> 1. Ecological and biodiversity value of areas of woodland and scrub, including areas designated as OSNI and SINC (borough grade II) at Kew railway bridge and Kew Meadow Path next to the public right of way; 2. Proximity to the River Thames and Access to the Thames Path; 3. The role the area plays as a setting to the River Thames and Thames Path, including the dense trees and vegetation which create a perception of greenness with few views of development from the Thames Path, river, the opposite bank in LB Hounslow and in views west from Chiswick Bridge; 4. Allotment next to the Thames Path; 5. The extensive landscape setting around Kew Riverside residential development which integrates buildings well into their surroundings. <p>In our judgement points 2, 3 and 5 of these 'Valued Features' constitute repetitions, and can be summarised as follows: <i>'The area's dense vegetation coverage provides a perception of greenness and screening in relation to the River Thames, evoking an extensive landscape setting which positively contributes to the River's setting.'</i></p> <p>In relation to the design guidance for the East Kew Mixed Use area (Area G3), the Study states that tall buildings are to be set in landscape (Page 302). We do not consider this an appropriate approach to the urban design for the area, given its urban context. The guidance goes on to state that development within the area should <i>'improve connectivity within the area, and to the</i></p>	<p>For clarity, a previous scenario on the site included modelling of blocks varying in height and including blocks between 7-9 storeys. An amendment has been made to the text within Appendix A justification and assessment sections of the Urban Design Study to clarify the scenario included a range of heights up to 9 storeys, rather than just 9 storeys.</p> <p><u>Response to the UDS approach and methodology</u> See response to comment 1030. No amendments are required.</p> <p><u>Kew Retail Park</u> The Urban Design Study has identified there is capacity for the site to accommodate buildings up to 7 storeys 'within part of the tall building zone in the centre of the site' (p.257). The UDS has assessed the tall building zone with reference to a scenario, as set out in Appendix A (p.335-337). The assessment concludes that 'the depth of the Kew Retail Park site offers potential for buildings up to 7 storeys within part of the tall building zone in the centre of the site. The existing character and size of the Kew Retail Park site provides opportunity for a development that could positively enhance the character of the area'. (p.337). As illustrated on p.336 of the UDS, the assessment in Appendix A includes a Zone of Theoretical Visibility (ZTV) of a 7 storey building in the centre of the site, and shows that visibility of this is unlikely to extend to Kew WHS. However, heights above this would found to likely be visible. It would therefore not be appropriate to amend the text to reference 8 storeys.</p>
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		<p><i>riverside</i>'. As referenced by Arup within the Study (Page 302), the area comprises numerous private plots of land, making improved connectivity, especially along the eastern boundary of the Kew Retail Park site, difficult to achieve. This demonstrates the need for a detailed townscape character assessment and site analysis to fully understand the constraints and complexities of the Kew Retail Park site and to better inform the proposed design guidance.</p> <p>Given the weight attributed to townscape character within planning decisions, the need for future development to contribute positively to the borough's rich townscape, as well as the weight its attributed in setting our specific scales and levels of development throughout the borough, we are concerned with the lack of assessment undertaken throughout the Study, particularly in relation to townscape analysis of specific character areas.</p> <p>The Study fails to identify existing tall building development within the borough. Whilst we agree with the statement made at Page 43 that <i>'modern tall buildings and tower blocks are relatively rare'</i> across the borough, tall buildings do exist, away from the areas of Twickenham town centre and East Twickenham local centre. This includes relatively modern residential development at Vineyard Heights to the east of Chiswick Bridge, as well as the former Stag Brewery fronting the River Thames and the National Archives at Kew. This highlights disparities within the evidence base and the lack of a thorough, granular assessment.</p> <p>A granular analysis of townscape characteristics is required to provide a sound understanding of the existing and emerging context to inform specific development parameters for sites within the borough. The Study identifies specific parameters for tall building development, identified as 'Tall Building Zones' within Appendix A. These 'Zones' are specific and constrained and are not considered to be supported by sufficient supporting evidence to justify the identification of exact/precise parameters of development.</p> <p>Section 4.6 (Page 240) provides a definition of tall buildings in LBRuT, based on an analysis of existing tall buildings, consented schemes and masterplans, as well as scenarios prepared specifically for the study.</p> <p>Firstly, there is a presumption here that tall buildings are only acceptable within town centres, or where existing development has a negative impact/contribution on the character of an area.</p> <p>In our considerable experience of working on tall building projects, tall building development is capable of being acceptable in areas of lower height. What matters is the quality of their design and the way in which they respond and relate to the existing and emerging context, and the way the transition between scales is manifested. There are many examples of where this approach is acceptable in townscape terms and in sensitive heritage locations.</p> <p>Indeed, London Plan (2021) Tall Building Policy D9 allows for such an approach to be taken. We highlight the recent Hillingdon judgement [Case Ref: CO/1683/2021] which makes clear that tall buildings can be found to be acceptable in areas that are not identified as being acceptable by local planning authorities, where they meet the terms of Part C of D9. Thus, the analysis of acceptability should allow for some flexibility when forming a broad definition of where tall buildings are permissible (we refer to draft Policy 45 which we highlight in Section 21 of this report, and where we make a similar comment). [See comment 1038 in relation to Policy 45]</p> <p>Page 237 of the Study states that the evidence base does not show, nor considers where newly consented tall buildings are expected to be built across the borough in the coming years.</p> <p>Emerging context is a weighty material consideration when understanding how a place/area is to evolve over time, and where intensification of development has been established and is likely to be accepted in the future.</p> <p>In relation to East Kew Mixed Use Area (Area G3), this includes the omission and lack of reference to the Kew Biothane Plant redevelopment, comprising the introduction of a six-storey, specialist residential development fronting the River Thames (ref: 18/3310/FUL). Whilst reference is made to the Kew Biothane site later in the Study (Page 302 & 375), these references are not carried through to the wider assessment of 'Probability of Change' and 'Development Capacity' conclusions. Furthermore, such emerging context/development is a key consideration when setting development/height parameters for tall building zones within an area. We consider this point again when discussing the Kew Retail Park site (Section 2.3).</p> <p>Applying the Methodology</p> <p>In relation to the East Kew Mixed Use area (Area G3), if the supporting evidence data was underpinned by a proper and thorough assessment, which would have identified the significant imbalance between positive and negative townscape features within the area (as reference in Paras. 2.19 – 2.23), the resulting sensitivity would be identified as Low, rather than the currently identified Medium, as illustrated at Figure 2.2.</p> <p><i>Figure 2.2 Sensitivity Plan. Figure 268 of the Urban Design Study (2021)</i></p>	
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It is stated at Page 238 of the Study that Kew Retail Park is identified as being known to benefit from an emerging masterplan or subject to on-going /emerging redevelopment opportunities. Within the Draft LBRuT Local Plan, the Retail Park has been provisionally allocated for a 'Comprehensive residential-led redevelopment of the site with a range of commercial uses, including retail, offices and leisure'. It is therefore widely known, and more importantly, LBRuT anticipate significant redevelopment of the site over the next plan period (circa. <5 years).

We question, therefore, the area's identification as having only a Medium 'Probability to Change'. Whilst we acknowledge the East Kew Mixed Use Area comprises land beyond the Retail Park boundaries, the Retail Park and associated large surface car park covers approximately 35-40% of the sub-character area's total land area. Significant intensification and redevelopment should therefore be expected and anticipated to come forward within the area. This, coupled with the draft site allocation at the Kew Biothane site, and the identification of the long-term opportunity to transform the character of the area (Page 302 of the Study), means the Probability of Change for the East Kew Mixed Use area should be elevated to High.

Putting a 'Sensitivity to Change' of Low and a 'Probability of Change' of High through the Study's Matrix (see Figure 2.3), we conclude that the 'Development Capacity' of the East Kew Mixed Use area (Area G3) should be scored at 7, the highest rating. Figure 2.3: Development Capacity Matrix (Table 1 of the Urban Design Study, 2021)

		Probability			
		High	Medium	Low	Very low
Sensitivity	High	5	3	2	1
	Medium	6	4	3	1
	Low	7	5	3	2

Definition of Tall Buildings

As stated in Para. 2.24, Section 4.6 (Page 240) of the Study provides a definition of what is considered a tall building within LBRuT. A tall building is defined within the Study as: 'Buildings which are 7 storeys or over, or 21m or more from street level to the top of the building, whichever is lower'.

There is a lack of consistency with the implementation of LBRuT's definition of a 'tall building'. We have identified references within the Study where Arup have identified buildings which are mid-rise (by LBRuT's definition), incorrectly as 'tall buildings'. Page 237 of the Study identifies the extant permission at Kew Biothane Plant within the East Kew Mixed Use area (Area G3) as a 'Consented Tall Building'. As set out at Page 375 of the Study, critical praise is given to the design rationale behind the redevelopment proposals presented at Kew Biothane. As stated, the maximum height of the extant permission on the site is six-storeys, therefore constituting a 'Mid-Rise Building' as illustrated in Figure 2.4 below. This illustrates one example that reflects a broader lack of consistency.

Figure 2.4: Definition of tall and mid-rise buildings for Richmond (Figure 374 of the Urban Design Study, 2021)



Tall Building Zones

Section 4.6.4 of the Study uses the constraints and opportunities identified in the preceding sections to identify 'Tall Building Zones'. The Study states: 'The following pages provide the appropriate height and a description of the tall building zones and mid-rise building zones within each Place'.

Appendix A provides the supporting evidence and justification for the extents and appropriate heights of each of the identified tall building zones. The Study states at Page 316 that: 'The broad areas identified in the tall buildings strategy have been analysed to understand whether there are individual zones within them that have the potential to accommodate tall buildings'.

The analysis identifying if an area is appropriate for tall buildings includes a high-level assessment of the potential impacts a tall building may have on:

- Townscape character, including relationship to existing landmarks and the River Thames;
- Views and visual amenity, including long range views (particularly local or strategic views); and
- Heritage assets, including the setting of Kew Gardens World Heritage Site, Registered Parks and Gardens, Scheduled Ancient Monuments, conservation areas and listed buildings.

Zones are then tested using analysis of:

- Scenarios developed specifically for the Urban Design Study;
- Consented tall buildings and/or masterplans; and
- Existing tall buildings and how they contribute (positively, negatively or neutrally) to the existing character of an area.

The Study states that the scenarios developed in order to test the appropriateness of Tall Building Zones have been prepared solely for the purpose of testing additional height and density at a site and are not intended to be viable site-specific masterplan proposals (Page 316). This approach ignores the importance of viability in order to ensure development can, and ultimately will be delivered on a site and is therefore not sound.

The Study further states at Page 241 that, 'Tall buildings shall: incorporate an appropriate range of building heights and open spaces'. Whilst this statement is generally supported, its implementation in practice will be difficult to achieve if there is not a ranged figure for tall building zones. This is particularly relevant in relation to the Kew Retail Park site, where the current drafting of LBRuT's policy restricts development to 7-storeys. This is discussed further at Paras. 2.52 – 2.60 [see below].

Spatial Hierarchy

In Section 5 of the Study (Page 264), it is stated that, 'Tall buildings require more space around them to ensure they integrate well into the overall townscape'. This is not necessarily the case, and the Study presents little evidence to support this statement. The example given is, 'In many estates this is managed through extensive parkland settings with mature trees', which suggests a typical mid-late-20th century tower block set in surrounding landscape. It is unlikely that this example of urban design would be appropriate and suggesting such development would limit the ability to create a fine grain masterplan that integrates with the surrounding urban fabric, resulting in an inefficient use of land.

The Study goes on to suggest (Page 264) that tall buildings can soften their impact at ground level through 'generous walkways and mature planting'. As stated later in this representation in Section 21, this appears to conflict with the policy set out in London Plan Policy D9, which states, 'The function of the base should be to frame the public realm and streetscape, articulate entrances, and help create an attractive and lively public realm which provides a safe, inclusive, interesting, and comfortable pedestrian experience'.

(3) Analysis of Kew Retail Park Site

Kew Retail Park is located to the west/south-west of the River Thames, accessed through a residential, suburban neighbourhood, situated off Bessant Drive. The site comprises a large retail unit of a large footplate, surrounded to its south and west by large and associated car-parking facilities. To the east, modern, mid-rise, residential development sits between the site and the western towpath of the river, whilst to the north-east, the large format building of the National Archive is located circa. 120m from the site's northern/north-eastern boundary.

The Retail Park contrasts greatly with the suburban and residential townscape character which prevails throughout the surrounding local context. Whilst landscape buffering and sapling trees within its carpark help soften its appearance to a degree, its commercial townscape character greatly detracts from the high-quality, residential townscape seen to the south and west.

Furthermore, blank elevations with little articulation provide little to no permeability through the site, acting as a solid barrier to the River Thames to its east.

Figure 2.5 Satellite Image of Kew Retail Park Site (Outlined in Red)



It is noted within the Study that the site lacks a cohesive layout, has a poor legibility or identity and does not positively contribute to the character of the wider area. As stated above, in our judgement, the analysis of the existing situation at Kew Retail Park should also conclude that the Site detracts from the high-quality residential townscape seen across neighbouring sub-character areas, as well as detracting from the relatively high-quality modern residential development and associated landscaped areas closer to the River to the north-east. Whilst we agree with the Character Strategy set out at Page 302 of the Study, in that there is a long-term opportunity to transform the area's character, the Study can and should go further to identify significant opportunities to introduce high-quality intensification on the Retail Park site, introducing development that will make best use of the land and contribute positively to the surrounding area.

The scenario presented for Kew Retail Park tests two possible building heights: seven and nine-storeys. In reference to nine-storeys (Figure 2.6), the Study states that a Zone of Theoretical Visibility (ZTV) was produced to identify visual receptors. The Study does not present/illustrate the ZTV concerning the nine-storey scenario. This should be made available for review and comment.

The ZTV presented at Page 336 of the Study (Figure 2.6) illustrates the ZTV of seven-storeys located at the centre of the Site. Firstly, we welcome Richmond's identification of Kew Retail Park as being able to accommodate tall buildings. Whilst welcomed, it is demonstrated in the presented ZTV that visibility of such a scale (seven-storeys) is limited to the local area, with partial visibility from the surrounding conservation areas and neighbouring sub-character areas. The Study notes that there is no visibility from within Kew Gardens at seven-storeys. We question why the Study does not take into account/test an eight-storey scenario on the Site.

Visibility of such a scenario (eight-storeys) would continue to be limited to the local area, whilst continuing to sit comfortably within the viewpoints identified at Page 337 of the Study (Figures 2.9 & 2.10). Eight storeys at the site would not change the conclusions reached in relation to seven storeys, in that the scale of the development sits comfortably with the scale of existing development along Defoe Avenue, and massing does not extend above the vegetated skyline of the River Thames corridor.

Figure 2.6: Kew Retail Park Zoner of Theoretical Visual Influence (seven storeys) (Figure 440 of the Urban Design Study, 2021)



Figure 2.7: Kew Retail Park Massing Model Illustrating Nine-storeys on the Parameters of the Site (Figure 439 of the Urban Design Study, 2021)

			 <p>Whilst it is understood that the scenario presented at Kew Retail Park is a conceptual model, a future redevelopment proposal at the Retail Park would comprises high-quality articulation, orientation, profiling and be of varied heights across the Site. Presenting a block model of nine-storeys across the site (Figure 2.7) does not represent a viable and rational form of development that would come forward, or one that would be considered acceptable.</p> <p>With the limited analysis of the townscape character of the area, the lack of detailed assessment and testing of numerous viewpoints and differing scenarios, the precise height parameters of seven-storeys is unjustified. The appropriate location and heights of buildings should be subject to detailed testing and the Landowners would welcome involvement in this process. If further testing is not to be undertaken, a broader approach to potential height on the site should be implemented, setting a ranged figure between five to nine-storeys, with the acceptability of any future proposals based on the merits of an application/design rationale, even if development exceeds these figures.</p> <p>The justification for the building zones set out on Page 335 of the Study require further detailed investigation. The Study notes that the mid-rise building zone provides an area of transition to the more modest buildings in the surrounding area. This is true along the western boundary of the site, where it neighbours properties along West Park Avenue, however, it can be argued that this zone should extend to the southern boundary, as the neighbouring properties are also of a similar scale (circa. 4-5 storeys) to what is proposed as being the mid-rise building zone.</p> <p><i>Figures 2.9 (left) and 2.10 (right): Left –VuCity view along Defoe Avenue representing seven-storeys. Right – View from the opposite river bank in LB Hounslow. Figures 441 & 442 of the Urban Design Study, 2021.</i></p>  <p>In summary, the scale of any redevelopment of the site should not be constrained by overly restrictive policy requirements that will adversely impact on viability and may prejudice redevelopment proposals. Instead, the scale of development should be optimised, with the focus being on design quality and placemaking, based on sound detailed analysis.</p> <p>Whilst we agree with the findings of the Urban Design Study that Kew Retail Park is capable of accommodating tall buildings, we find the height parameters presented to be overly conservative and restrictive.</p> <p>Overall, given the flaws in the Study, we consider that the evidence base is unsound.</p> <p>Recommended Amendments (tracked changes to Reg.18 draft text)</p>	
1038	Nick Alston, Avison Young on behalf of St George Plc and Marks & Spencer	Policy 45 Tall and Mid-Rise Building Zones		See responses to comments 1037 and 1030. No further amendments are required.

			<p>how they work together as well as with the surrounding area and mid range and long range views.</p> <p>5. Development proposals should be supported with visual impact analysis 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.</p> <p>6. Development proposals affecting the setting and approaches of the Kew World Heritage Site, must address all criteria set out in Policy 29 Royal Botanic Gardens, Kew World Heritage Site</p> <p><u>Spatial Hierarchy</u></p> <p>7. The massing of tall buildings should respond to respect the proportions of their local environment, including the consideration of the width of adjacent streets as well as public open spaces, parks and watercourses, and should be designed so as not overwhelm the street and adjacent context.</p> <p>8. In cases of tall buildings located close to the street edge, proposals should incorporate measures to soften their edges and provide positive public spaces at their base through the use of generous walkways and mature planting.</p> <p>9. Proposals for Tall Buildings will not be permitted outside the identified Tall Building Zones (see Appendix 3)</p> <p>10. Proposals for tall buildings should not exceed the appropriate height range identified for each of the tall building zones in Appendix 3. The height of tall buildings will be required to step down towards the edges of the zone as indicated on the gradient map</p> <p>Tall and Mid-Rise Building Near the River Thames Frontage</p> <p>B. Proposals for tall and mid-rise buildings should address the following criteria:</p> <p>1. The design of Tall buildings and mid-rise buildings fronting the River Thames must respond to views towards them as well as from them.</p> <p>2. In areas of larger-scale riverfront buildings, consider landward facing orientation and respond step down respond step down appropriately to provide a transition towards the existing character and scale.</p> <p>3. The design of tall buildings and mid-rise buildings should maintain the river frontage as a public resource. Developments should respond to be set back to physically and visually ensure the Thames Path acts and feels like a welcoming public route without heavy overlooking from adjacent riverside residences. Ground floor uses should seek to activate the space as far as possible.</p> <p>Mid Rise Buildings</p> <p>C. Proposals for new mid-rise buildings or extensions to existing buildings which increase their height to 5 storeys or over, will usually only be appropriate in mid-rise and tall building zones identified on the Policies Map and in Appendix 3. Proposals will be required to meet the requirements of Policy 44 Design process and Policy 28 Local character and design quality and should</p> <p>1. be carefully located and designed to respond step down to surrounding existing and proposed buildings;</p> <p>2. respond positively and conserve protect the setting of existing buildings in the surrounding area, including heritage assets;</p> <p>3. respect the scale, width and proportion of adjacent streets and watercourses, and local character, including potential effects on key characteristics, valued features and sensitivities as outlined in the character area profiles in Section 3 of the Urban Design Study;</p> <p>4. deliver a varied and interesting roofline in response to surrounding architectural styles, avoiding long monotonous blocks of development and/or excessive height.</p> <p>5. Where proposals are located within identified mid-rise and tall building zones, buildings should not exceed the appropriate height identified in Appendix 3.</p> <p>6. In cases of mid-rise buildings located close to the street edge, proposals should incorporate measures to soften their edges and provide positive public spaces at their base through the use of generous walkways and mature planting.</p> <p>Explanation/Justification</p> <p>As set out in Section 2 of this representation, we have demonstrated that the supporting evidence base set out in the Urban Design Study (2021) is unsound, lacking in the necessary thorough assessments to support specific height parameters within identified Tall Building Zones (as set out in Appendix 3). Owing to the evidence base that underpins and supports Policy 45 being unsound, we find the drafting of the Policy unsound. The recommended amendments set out above should make the policy sound.</p>	
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			More specific recommended amendments relate to policy requirements regarding the base of buildings, which require that “generous walkways and mature planting” should be provided at the base of tall and mid-rise buildings. The definition of the walkways is ambiguous, and the expectation of mature planting would be difficult to deliver from day one. There is no evidence provided within Urban Design Study to support this. This part of the policy should be more in line with London Plan Policy D9 which states “The function of the base should be to frame the public realm and streetscape, articulate entrances, and help create an attractive and lively public realm which provides a safe, inclusive, interesting, and comfortable pedestrian experience”.	
1039	Alice Shackleton, on behalf of The Kew Society	Policy 45 Tall and Mid Rise Buildings - Kew Retail Park site	The Kew Retail Park site which is earmarked both for Tall Buildings and Mid-Rise Buildings should (over the whole site) be no more than 5 storeys. This would be in keeping with the adjacent Kew Riverside development and the National Archives. A Tall Buildings designation for part of the site will affect views from the MOL of the Thames and be out of keeping with the buildings in the locality. The whole of that site should be no more than Mid-Rise.	The Urban Design Study 2021 has identified that there is capacity for the site to accommodate buildings up to 7 storeys ‘within part of the tall building zone in the centre of the site’ (p.257). The UDS has assessed the tall building zone with reference to a scenario, as set out in Appendix A (p.335-337). The assessment concludes that ‘the depth of the Kew Retail Park site offers potential for buildings up to 7 storeys within part of the tall building zone in the centre of the site. The existing character and size of the Kew Retail Park site provides opportunity for a development that could positively enhance the character of the area’. (p.337). The UDS has assessed views from the river and from the opposite bank where the relationship with the surrounding buildings was considered to be in proportion (p.337 Fig 442). The tall building zone designation is therefore considered to be appropriate and acceptable and no amendments to the text are required.
-		Note comments on site-specific designations for tall and mid-rise zones are included in this schedule under relevant place-based strategies and site allocations and Appendix 3 which identifies each tall and mid-rise zone.		
-		Policy 46. Amenity and living conditions		
1040	Tim Catchpole, Mortlake with East Sheen Society	Policy 46. Amenity and living conditions	Again, this could likewise sit better in the section on Local Character and Design Quality.	Policy 46 replaces adopted Local Plan Policy LP 8, which is a standalone policy. Whilst aspects of local character and design quality will sometimes be relevant to the assessment of an application’s impact on neighbouring amenities (as it would be against any of the policies within the Local Plan, as there is frequently cross reference and applications are assessed against the Plan as a whole), the policy specifically relates to amenity and living conditions, and it is therefore right that there should be a separate policy for this. This section links with the theme of improving design and delivering high quality places.
1041	Mr & Mrs Metcalf	Policy 46 Amenity and living conditions, Policy 28. Local character and design quality - general comments in relation to residential amenity	<p>Our overriding concern with Local Plan is that it is too broadly worded to fulfil effectively one of its key functions, namely the protection of the Borough and its residents from adverse development.</p> <p>This is a particular issue with Policy 28 Local character and design quality (Strategic Policy) and Policy 48 Amenity and living conditions. For example, the latter states that it must be “ensure[d that] balconies do not raise unacceptable overlooking”, that “balconies or terraces on roofs of main buildings can be visually intrusive and result in serious intrusion into the privacy and quiet enjoyment of neighbouring residential properties,” and states that applicants are to “have regard to” SPDs such as House extensions and external alterations, which itself states (at paragraph 3.2.1) that “using the roof of an extension as a balcony, will not normally be unacceptable.”</p> <p>Any ordinary lay reader would reasonably think that these policies prohibit a large first floor roof terrace, above a ground floor extension, affording a vast viewing platform into a neighbouring garden. Yet it would seem that on the strength of the words “have regard” and “normally”, and that “unacceptable overlooking” is subjective, the Borough’s planning officers permitted such a development, simply declaring that it “would not be expected to result in any undue overlooking of this property’s rear garden” (and without even undertaking a site visit to the garden in question). We are, of course, the overlooked neighbours in that particular case. However, this is not “sour grapes”. It is evidence of the fact is that the Local Plan then and as now proposed is insufficiently tightly worded if it can allow such to occur.</p> <p>A further factor here is the unfortunate effect of the Borough’s paying the cost of losing an appeal against its decisions and that only an unsuccessful applicant, rather than an unsuccessful objecting neighbour, is ever likely to be in a financial position to appeal. Naturally that tends to create a situation in which unconscious bias in favour of applicants can arise. (For the avoidance of doubt, NPPF para 11 does not create a presumption in favour of development – it merely requires adopted policies to be followed.) For this reason too, ie to take away the scope for unconscious bias, the policies need to be more tightly worded.</p>	<p>New development is expected to have neighbouring amenities at the forefront of its design. Where there are likely to be impacts, developers are expected to mitigate these via the design of the development and/or agree to conditions attached to the planning decision. The wording of Policy 46 is considered to sufficiently make this requirement of developers-clear. However, owing to its existing built-up nature, the majority of development in London will have some impact on neighbouring amenities. That there would be some impact does not mean that the effects would be unacceptable for the occupier(s). Further, compliance with the Development Plan needs to be assessed by reference to the content of the Plan as a whole. Thus it does not mean that a proposal which has some unavoidable impact on neighbouring amenities, and where all reasonable steps have been taken to address this, would warrant overall refusal of the application. The current wording of the policy is therefore considered to sufficiently allow the local planning authority to make an informed judgement on the impact of a development, on its own individual merit, as part of the planning balance in the assessment of an application.</p> <p>In reference to the site specific example cited, it is not possible to comment on individual planning applications without knowing the details of the case. From a policy perspective, whilst use of a roof as a terrace might usually be deemed unacceptable, it cannot be said that this would always be the situation in every single case, as each application is assessed on its own individual merits. It would therefore be unreasonable to amend the policy to state that roof terraces will not be supported in any circumstances, as in some situations, the design, layout and site circumstances might render such an arrangement acceptable. As stated above, that there is some impact on a neighbour’s amenity does not necessarily mean that the impact is unacceptable; for example, there might be collective overlooking of neighbouring gardens already by virtue of the existence of upper-floor rear-facing windows or other arrangements in the vicinity, thus any overlooking caused by development might not be above and beyond what already occurs. There might also be other policies within the Local Plan which require consideration as part of the assessment, such as the need to provide adequate private amenity space for a new dwelling. The wording of the policy is therefore considered to be appropriate, as it stresses the importance of protecting</p>

				<p>neighbouring amenities as part of any development proposal, whilst recognising that each application should be assessed on its own individual merits and against the Development Plan as a whole as part of the planning balance in the decision-making process.</p> <p>As per Section 38(6) of the Planning and Compulsory Purchase Act 2004, all planning decisions are made in accordance with the Development Plan unless material considerations indicate otherwise. Planning decisions are based on a planning judgement following an assessment of the scheme. The Appeals process exists for where applicants feel that planning permission was refused for reasons that they think go against the Development Plan (there is no third party right of appeal in England and Wales). Where an application is refused and then appealed, the Council would seek to defend their reason(s) for refusal on policy grounds and make a case to the Planning Inspector (PINS) on this basis. A costs application would only be granted by PINS where the Council has been found to have acted unreasonably, or caused the appellant unreasonable costs or delay. That these processes exist, and the reasons for them, does not mean that planning officers would have a 'subconscious bias' towards a developer, or any other interested party. It is therefore not considered that the wording of the policy or supporting next requires amendment to address the commenter's concern.</p> <p>The NPPF 2021 sets out the Government's planning policies for England including the presumption in favour of sustainable development. It is a material consideration in the determination of all applications. The presumption in favour of sustainable development does not change the statutory status of the Development Plan as the starting point for decision making; rather the 'presumption' is a 'golden thread' running through both plan-making and decision-taking. In practice this presumption can take many forms. For example, a Council might encourage a developer to engage in pre-application prior to the submission of a planning application, in order to identify early on in the process any neighbouring amenity concerns, so that these can be addressed as part of a full application to increase the likelihood of a development being supported by officers. It is not considered that the wording of Policy 46 is in conflict with the NPPF.</p>
-		Reducing the need to travel and improving the choices for more sustainable travel		
1042	Richard Carr, Transport for London (TfL)	General comments in relation to transport policies and evidence base	<p><i>Please note that these comments represent the views of Transport for London (TfL) officers and are made entirely on a 'without prejudice' basis. They should not be taken to represent an indication of any subsequent Mayoral decision in relation to this matter. The comments are made from TfL's role as a transport operator and highway authority in the area. These comments also do not necessarily represent the views of the Greater London Authority (GLA). A separate response has been prepared by TfL Commercial Development to reflect TfL's interests as a landowner and potential developer.</i></p> <p>As you are aware, the London Plan 2021 was published in March 2021 and now forms part of Richmond's development plan. We strongly welcome your aspirations to implement the 20 minute neighbourhood concept, reduce the need to travel and improve the choices for more sustainable travel. In particular, we welcome the ambitions set out in the draft local plan to: decrease car use and achieve mode split targets and implement the Healthy Streets Approach. It would be helpful if reference could also be made to achieving the Mayor's Vision Zero ambition for road safety. We are pleased to see the plan's recognition of the importance of active travel and public transport.</p> <p>We commend you for adopting London Plan parking standards and the encouragement of car free development. However, this positive approach is not always reflected in site allocations and some of the accompanying text which refers to car parking requirements or needs. We would welcome a more consistent approach to encouraging car free development wherever possible, including the redevelopment of existing car parking and minimising the amount of parking elsewhere.</p> <p>We welcome your intention to seek contributions towards active travel improvements and enhanced public transport capacity and infrastructure. We also welcome the safeguarding of transport land, although this should be extended to existing transport infrastructure as well as future schemes.</p> <p>As part of the evidence base to support the Local Plan we recommend that you consider the potential need for a borough-wide strategic transport assessment which would look at the cumulative impact of major site allocations and the expected background growth in travel. This would help to address concerns that may be expressed about the deliverability of Local Plan proposals and would be useful when considering the transport impacts of major sites when they come forward for development. TfL has a number of modelling and assessment tools that could be made available to consultants carrying out the assessment work on your behalf.</p> <p>Our responses to specific points in the draft local plan are set out in more detail in the attached appendix [See comments in this schedule in relation to place-based strategies, site allocations and policies]. We look forward to continuing to work together in drafting the final document and are committed to continuing to work closely with the GLA to deliver integrated planning and</p>	<p>The Council wants to facilitate car-free development and development with low numbers of car parking spaces to encourage occupants to make more journeys by sustainable modes of transport. However, where there is no CPZ to preclude an occupant from obtaining on-street parking permits for, or where the CPZ operates for a small number of hours per day, the Council must assess the impact of the development on on-street parking stress and the risk that the additional stress could lead to unsafe on-street parking. Changes to the regulation of on-street vehicular parking and movement are implemented via statutory processes outside of the planning process and are subject to separate approval processes.</p> <p>Regarding the need for a Borough-wide strategic transport assessment to help assess the cumulative impacts of major developments, the Council strongly encourages applicants to use the pre-application advice service it offers to work with Council and TfL Officers to agree with parameters of any vehicular traffic impact assessment and the tools used to complete this. In practice, where the development is a major one for which a full transport assessment is required (see Table 23.1), this will involve the use of nationally used assessment tools such as TEMPRO and, in instances where the impact on signalised junctions on local roads, and the impact on links and junctions on the TLRN needs to be assessed, TfL's modelling tools have to be used in any case.</p>

			<p>make the case for continued investment in transport capacity and connectivity to enable Good Growth in Richmond and across London.</p>	
1043	Janice Burgess, Highways England	General comments in relation to strategic road network and evidence base	<p>National Highways has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). Our network is a critical national asset and as such, we work to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity. There are no sections or junctions with the SRN within the Richmond borough, although a series of junctions lie just beyond the boroughs boundary that could still be affected by development and policies within Richmond. Just beyond the boroughs boundary, the closest junctions and sections of our network include M3 J1 (including a short section of the A316) positioned to the west, and M4 J1 and J2 to the north.</p> <p>We have undertaken a review of the LP (Pre-Publication Regulation 18 Consultation Version) dated 10th December 2021, for which our interests relate to the operation and safety of the SRN. We are interested as to whether there would be any adverse safety implications or material increase in queues and delays on the SRN as a result of the LP proposals.</p> <p>National Highways a key delivery partner for sustainable development promoted through the plan-led system, and as a statutory consultee we have a duty to cooperate with local authorities to support the preparation and implementation of development plan documents. Highways England is aware of the relationship between development planning and the transport network, and we are mindful of the effects that planning decisions may have on the operation of the SRN and associated junctions. We cannot cater for unconstrained traffic growth generated by new developments, and we therefore encourage policies and proposals which incorporate measures to reduce traffic generation at source and encourage more sustainable travel behaviour. In order to constructively engage in the local plan-making process, we require a robust evidence-base so that sound advice can be given to local planning authorities, in relation to the appropriateness of proposed development in relation to the SRN. This also extends to include transport solutions that may be required to support potential site allocations.</p> <p>We would like to draw your attention to National Highways document 'The Strategic Road Network, Planning for the Future: A guide to working with Highways England (now National Highways) on planning matters' (September 2015). This document sets out how we intend to work with local planning authorities, communities and developers to support the preparation of sound documents, which enable the delivery of sustainable development.</p> <p><u>National Highways Comments</u></p> <p>National Highways has not provided comments on specific policies or draft site allocations in the LP, but we have provided general comments that relate to our primary interests for the continuing operation and safety of the SRN.</p> <p>With the borough sharing no boundaries with the SRN, it is accepted that LP policies and development allocations will have no boundary issues related to the SRN, i.e. drainage, boundary treatment, noise, etc.</p> <p>National Highways interests relate to the potential traffic impacts of development allocations and/or policies coming forward, and the need to ensure that these are fully assessed during the plan-making stage. It is also imperative to identify any improvements needed to deliver LP aspirations at this early stage, as set out in Government policy. In terms of site allocations and transport in NPPF (2021), the relevant section from Para. 110 states that '<i>in assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that: d) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree</i>' Para 111 then states that '<i>development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe</i>'.</p> <p>Paragraph 18 of the DfT Circular 02/2013 states that '<i>capacity enhancements and infrastructure required to deliver strategic growth should be identified at the Local Plan stage, which provides the best opportunity to consider development aspirations alongside the associated strategic infrastructure needs. Enhancements should not normally be considered as fresh proposals at the planning application stage</i>'. This relates to the LP Policy 2 (Spatial Strategy: Managing change in the borough) , which states that '<i>the overarching aim (of the LP) is to ensure that growth is delivered in a sustainable way, with supporting infrastructure, while tackling the climate emergency and biodiversity crisis</i>'.</p> <p>The covering letter accompanying the Reg 18 consultation states that '<i>strategic traffic modelling will be explored to consider further the impact of proposed development (as a result of the Richmond Local Plan alone and/or in-combination with others)</i>'. National Highways welcomes this approach.</p> <p>For Local Plan allocations, National Highways would expect necessary SRN improvements to have already been identified and tested as part of the long-term Transport Strategy. This would be supported by traffic modelling and development assumptions, in determining if individual development allocations, and the cumulative LP has a 'unacceptable' impact on the SRN. It should identify the provision of infrastructure at the right time to support the development strategy, as part of an Infrastructure Delivery Plan (IDP). As such, as site allocation later come forward as part of the planning application process, they will be expected to proceed in line with the necessary highway improvements identified as part of IDP strategy. This being the case, the only issues for consideration as part of a planning application submission, would be the phasing of the development in relation to the IDP strategy. Highways England would make use of Grampian conditions to ensure that necessary infrastructure is in place prior too or phased in relation to the development becoming operational. This will be necessary to ensure operation and safety of the SRN.</p> <p>National Highways welcomes the LP policies that seek to promote and improve sustainable transport and accessibility, and ensure that each neighbourhood includes a wide range of amenities (i.e. 20 minute neighbourhood), in that private car travel is not required in the first place.</p>	<p>As set out in response to TfL above, the Council strongly encourages applicants to use the pre-application advice service it offers to work with Council, TfL, and, where there might be a significant impact on the SRN as a result of the development proposed, Highways England Officers to agree with parameters of any vehicular traffic impact assessment and the tools used to complete this. In practice, where the development is a major one for which a full transport assessment is required (see Table 23.1), this will involve the use of nationally used assessment tools such as TEMPRO and, in instances where there might be a significant impact on any part of the SRN, Highways England's assessment tools.</p> <p>See also response to comment 221 on the further work to assess the trip generation arising from the potential Site Allocations in the Plan.</p>

			National Highways does not raise any concerns with the LP as part of its Reg 18 consultation, but requests that the traffic impacts of site allocations be identified for the SRN. Subject to traffic volumes and traffic modelling, mitigation measures may need to be considered (with a methodology agreed with National Highways). If required, these should be identified as part of the LP, in an IDP / or mitigation strategy. This is a key consideration for Highway England in determining the soundness of the Plan.	
-		Policy 47. Sustainable travel choices (Strategic Policy)		
1044	Tim Catchpole, Mortlake with East Sheen Society	Policy 47. Sustainable travel choices (Strategic Policy)	<p>We support these policies and note that they are well matched with those promoted by TfL. However, we note that the published evidence base (studies completed and planned) do not include any Borough-based transport studies. We note that developments that would generate high volumes of trips should be focused in PTAL areas 4-6 unless mitigated by bus service improvements. This highlights some of the problems arising from the potential development of the Stag Brewery site.</p> <p>We note from para. 23.12 that safe networks should be created for pedestrians and cyclists and note that this clearly conflicts with the continuing deterioration of safety conditions being allowed around Mortlake Station and the Council's stance on the provision of local schools. We note that the policy in LP44 about protecting local filling stations has been omitted. Are we expecting filling stations to be phased out as more cars become electric? Where will tyre pumps and car wash facilities be located in the future? This surely needs to be addressed. It should be noted that we have only two filling stations in our area and that one of them is listed Grade II. Will it soon become a listed building under threat?</p>	<p>Regarding the lack of a Borough-wide transport study, the Council strongly encourages applicants to use the pre-application advice service it offers to work with Council and TfL Officers to agree with parameters of any vehicular traffic impact assessment and the tools used to complete this. In practice, where the development is a major one for which a full transport assessment is required (see Table 23.1), this will involve the use of nationally used assessment tools such as TEMPRO and, in instances where the impact on signalised junctions on local roads, and the impact on links and junctions on the TLRN needs to be assessed, TfL's modelling tools have to be used in any case.</p> <p>Regarding possible highway safety issues around Mortlake Railway Station, where a proposed development is anticipated to have a significant impact on highway safety in the vicinity of a Railway Station, and where mitigation that Officers propose is compliant with national planning practice guidance, and local and London Plan policies and meets the three tests set out in Regulation 122 of the Community Infrastructure Levy Regulations (2010), this will be sought in the form of a financial contribution from or highway works completed at the planning applicant's expense.</p> <p>Regarding any proposal that involves building a new primary or secondary school or relocating or increasing the number of pupils and/or employees within an existing school site, planning applicants are strongly advised to make use of the pre-application transport and highway safety advice service that the Council offers to agree the parameters of any transport and highway safety impact assessment. Where Officers consider the impact of the development on highway safety to be significant, where mitigation that Officers propose is compliant with national planning practice guidance, local and London Plan policies, and meets the three tests set out in Regulation 122 of the Community Infrastructure Levy Regulations (2010), this will be sought in the form of a financial contribution from or highway works completed at the planning applicant's expense.</p> <p>Regarding the omission of the section of Para. F within LP44 of the Interim Local Plan (2018) about safeguarding filling stations and supporting services such as car repair workshops, it is acknowledged that the lack of stand-alone filling stations invariably leads to motorists having to drive to out-of-town supermarkets to get fuel, which increases traffic congestion on the highway in the vicinity of those sites</p> <p>The supporting text has been amended in paragraph 23.21 for clarity as it also includes information about safeguarding required for transport schemes. A new paragraph has been inserted regarding refuelling stations:</p> <p><u>New para: To discourage vehicles having to make longer trips in order to reach refuelling stations, the Council is seeking to protect existing facilities.</u> Any new facilities should be located on strategic or distributor road networks to minimise disruption and to protect residential amenity. The provision of refuelling facilities for alternative types of fuel e.g. electric or hydrogen will also be encouraged.</p>
1045	Susan Norgan	General comments in relation to transport infrastructure and capacity	<p>4. Infrastructure plans are needed for larger developments For example, traffic congestion along South Worples Way has become dangerous. There are four junior schools within walking distance and pedestrians are in danger from cars driving at speed and mounting the narrow pavement to pass cars going in the opposite direction. How will traffic be managed especially HGVs when building the new large development there, and how will new resident traffic be organised.?</p> <p>5. The congestion on the Upper Richmond Road at peak times has caused Queens Road to be used as access to South Worples Way, as a rat run. There have already been problems with large vehicles delivering or removing building materials. There is insufficient turning circle which puts the terraced houses midway along at risk where vehicles mount the pavement.</p>	<p>Impacts of developments on highway safety are assessed as part of a transport assessment. Where Officers consider the impact of the development on highway safety to be significant, where mitigation that Officers propose is compliant with national planning practice guidance, local and London Plan policies, and meets the three tests set out in Regulation 122 of the Community Infrastructure Levy Regulations (2010), this will be sought in the form of a financial contribution from or highway works completed at the planning applicant's expense and by using planning conditions, subject to those conditions meeting the criteria set out in the National Planning Practice Guidance.</p>

				The impact of construction traffic on highway safety is assessed as part of any transport assessment. The proposed Local Plan Policies LP48, Paras. M and N set out when a construction management plan will be requested and what information it must contain. These documents are normally secured through pre-commencement planning conditions or obligations.
1046	James Armstrong, Richmond Cycling Campaign	Policy 47. Sustainable travel choices	<p>RCC is overall highly supportive of policy 47, it includes many positive measures to deliver on the Strategic Vision and a borough where choosing to walk or cycle is enabled. We suggest the following improvements (changes preceded and followed by asterisks):</p> <ul style="list-style-type: none"> - B. Location of development. [...] or improve infrastructure on the passenger transport network *and cycle network*. - C. Active travel. [...] All proposed pedestrian and cycle improvement works must have regard to the National Design Guide*, Manual for Streets and Local Transport Note 1/20 Cycle infrastructure design.* - D. Inclusive Mobility. Can LBRuT please confirm if this policy refers to Inclusive Mobility: a guide to best practice on access to pedestrian and transport infrastructure? If not, can this please be referred to. - 23.4. Location of development. Whilst in general higher PTALs are achieved in areas with good rail/tube connections, in this borough it is recognised that bus *and cycle* links also contribute to levels of accessibility. - 23.4. Location of development. Can LBRUT please clarify whether this policy intends that future improvements are to be implemented before the occupation of new development? Travel habits are most strongly formed at the start of occupation or use of an area. Sustainable and Active Travel infrastructure must be implemented before the occupation or use of a new development to have the largest impact on travel choices. - 23.12. Active Travel. It should be clarified that the measures noted in this policy should be applied in all new developments, whilst the use of modal filters should be considered for addition. Reference to Local Transport Note 1/20 Cycle infrastructure design should also be made in addition to the London Cycling Design Standards. - 23.13. Active Travel. The council should also ensure that signage and waymarking of the sections of National Cycle Route 4 that passes through the borough is achieved, along with other cycle routes passing through the borough that form part of Richmond's cycle network. - 23.19. Assessing the impact of developments. Developments will be expected to continue travel planning after occupation to maximise travel by sustainable *and active* transport, including personalised travel planning. Existing schools and large employers will also be encouraged to produce travel plans for their sites to help encourage sustainable *and active* travel. 	<p>Support for policy is noted.</p> <p>Part B refers to location of development in relation to the public transport network and improvements to capacity and infrastructure that may be required.</p> <p>Supporting active travel including walking and cycling is covered separately under Part C.</p> <p>Part C sets out the circumstances in which the Council will ask for financial contributions or physical highway improvements from planning applicants to mitigate the impact of their development. Amendment to part C to include reference to the London Cycle Design Standards and Local Transport Note 1/20 Cycle Infrastructure Design. The policies in the Local Plan are the starting point for the consideration of all applications and pre-apps that are submitted to the Council.</p> <p>Part D amended to state: Inclusive Mobility: making transport accessible for passengers and pedestrians. The supporting text in paragraph 23.15 to refer the latest guidance on Inclusive Mobility.</p> <p>Reference added "to public transport" in Para. 23.4. It is stated in the policy there will need to be certainty that future improvements will be implemented in time to serve the development and would be sustainable in the longer term. This would be discussed further through the pre-application and application process.</p> <p>A reference to the London Cycle Design Standards, Local Transport Note 1/20: Cycle Infrastructure Design has been included in part C. of the policy.</p> <p>Where it meets the criteria set out in Regulation 122 of the CIL Regulations (2010), mitigation will be sought that will improve the cycle network in the Borough. This may include improved wayfinding and signage.</p>
1047	Richard Carr, Transport for London (TfL)	Policy 47. Sustainable travel choices (Strategic Policy) and Paragraph 23.1	<p>We support the potential requirement in part B to provide financial contributions towards increased capacity or improved infrastructure. However public transport capacity constraints may also apply in higher PTALs and so the wording should make it clearer that there is a potential requirement for contributions to public transport in all areas, regardless of PTAL. The level and type of mitigation will be informed by a multi-modal impact assessment.</p> <p>Part C could refer to implementing measures that are identified through an Active Travel Zone (ATZ) Assessment in line with the Healthy Streets Approach</p> <p>Part H should refer to safeguarding existing transport infrastructure in addition to safeguarding transport schemes.</p> <p>23.1 We strongly welcome the borough's commitment to promoting sustainable travel, decreasing car use, and improving air quality. However, the commitment to decreasing car use could be made more prominent by referring to it in policies. As stated, 'Ensuring that walking, cycling and public transport are the natural choice for trips to and from new developments is vital if these goals are to be achieved.' We also welcome confirmation that Local Plan policies should be read alongside those in the London Plan and the Mayor of London's Transport Strategy.</p>	<p>Part A – amended to also include the following: reduce the proportion of trips taken by private car.</p> <p>Part B – wording of the policy does not preclude contributions towards public transport in higher PTAL areas. This will be assessed on a case-by-case basis in relation to proposals that come forward.</p> <p>Part C – Active Travel Zone (ATZ) Assessment can be implemented through Healthy Streets.</p> <p>Part H amended to state: transport schemes and infrastructure.</p>
1048	Richard Carr, Transport for London (TfL)	Paragraph 23.2	<p>23.2 When referring to the Council's sustainable transport mode split targets, it is helpful to clarify that developments will need to demonstrate how they are contributing to achievement of those targets.</p>	<p>Sentence added to the existing paragraph to state that Planning applicants proposing major developments will need to demonstrate how their proposals help meet these targets.</p>
1049	Theresa Oddelm, The Royal Parks	Reducing the need to travel and improving the choices for more sustainable travel Page 283 onwards– comments specific to biodiversity and the Royal Parks' Environmental Designations	<p>Specific reference should be made within this section to the impact of traffic and associated air pollution on designated sites and priority habitats, such as: Richmond Park SAC, SSSI and NNR; Bushy Park SSSI; veteran trees (a critical habitat for stag beetles, the SAC designated interest feature, and SSSI designated interest feature); and acid grassland (SSSI designated interest feature). This section should also highlight the need for the impacts referenced above to be mitigated by measures to reduce vehicle traffic in the vicinity of, and through, such sites and habitats.</p>	<p>The impact of development proposals on air quality and wildlife habitats and vegetation is assessed by the Environmental Health team and not through the transport assessment process.</p>
1050	Alice Shackleton, on behalf of The Kew Society	Policy 47 Sustainable Travel Choices	<p>C - It should perhaps be made clear that such walking and cycling routes should not obstruct public transport nor adversely affect the safety of those less able (eg cycle routes running inside a bus stop so that persons alighting from a bus might encounter cyclists on the pavement where the passengers are alighting - this impacts the elderly and disabled whose needs should be included in such policy). D relates to disabled persons but there are many others (elderly, less able but not disabled for example) who will be excluded by the priority of cycling over public transport which appears to be the case in the draft local plan. Sustainable travel choices should be inclusive and the needs of the increasingly ageing population need to be a very important consideration relating to travel and the 20 minute neighbourhood. There is a great danger that they will be excluded from this concept.</p>	<p>Officers agree that the wording needs to emphasise that high quality, safe access to public transport services will not be sacrificed in the achievement of the objectives set out in the Mayor's Transport Strategy and amendments have been made to parts C and D to reflect this.</p> <p>Text has been inserted in part C: and can benefit from high quality, safe access to public transport services</p>

				Text has been inserted in part D: <u>and other vulnerable road users</u>
1051	Laura Hutson, Sport England	Policy 47. Sustainable travel choices	Sport England is fully supportive of this policy which promotes a high quality walking and cycling environment in line with Sport England's own aims around Active Design. [See also comment 945 in relation to Active Environments]	Support noted.
1052	Gary Backler, Friends of the River Crane Environment (FORCE)	Policy 47. Sustainable travel choices (Strategic Policy)	<p>We fully support improvements in transport provision for both cyclists and pedestrians, and appreciate the commitment to signage and way marking of the River Crane Walk (23.13). We support the improvements that have been made in these facilities within the borough during recent years.</p> <p>We believe there is scope for further improvements along the River Crane and DNR that will benefit road traffic management, connectivity and public health. We would like to see improvements to the path beside the River Crane to increase clearances for pedestrians and cyclists under Hospital Bridge Road and the A316; de-trafficking of Craneford Way between the Challenge Court Meadow and Craneford West Field; and the opening of the path through Twickenham Junction Rough, at least during the hours corresponding to other traffic restrictions on RFU Event Days, and ideally on a permanent, unrestricted basis.</p> <p>We remain concerned at the in-borough focus of this specific policy. We know that many people use pedestrian and cycle networks across borough boundaries and this is what enhances their value for local residents and the wider communities. This approach can also bring in funding sources that are not available to in-borough schemes. As yet though, the Local Plan in general does not consider what happens beyond the borough boundary. We believe that the Council needs to consider active travel at a sub-regional level, working alongside other boroughs and in concert with agencies such as Crane Valley Partnership and Thames Landscape Strategy, to help deliver these cross-borough links.</p> <p>In 2019 FORCE worked alongside Ove Arup, The Crane Valley Partnership and The Colne Valley Partnership to produce the "Colne and Crane Valley Green Infrastructure Strategy". This document sets out a strategy for enhancing the linkages along the Crane valley and Colne valley corridors, linking the Thames with the Chilterns through a network of biodiverse green transport networks https://www.colnevalleypark.org.uk/project/green-infrastructure-strategy-colne-and-crane-valleys/ LBRuT officers engaged with this project as a key consultee. FORCE considers that the Local Plan would benefit significantly from adopting the Strategy as a strategic objective for enhancing green links between the borough and wider green infrastructure network, as well as committing to some of the very specific interventions identified in the Strategy.</p> <p>FORCE is currently engaged with the Crane Valley Partnership to develop the Smarter Water Catchment programme, funded by Thames Water. One of the key elements of this work is to identify the opportunities and blockages to green travel through the Crane catchment and this work is being delivered by Sustrans. We hope and expect that LBRuT will engage with the next stage of this project, in Spring 2022, which will seek to prioritise improvement options along the corridor, which extends from the River Thames through the London Boroughs of Richmond, Hounslow, Ealing, Hillingdon and Harrow.</p> <p>FORCE has conducted usage surveys for over ten years at multiple locations along the River Crane and DNR, providing quantitative insights into the relationships of residents with their open spaces. Our surveys also show the order of magnitude increases in cyclist and pedestrian usage that can follow investment in new and improved pathways. We would be pleased to share our data and insights, particularly when specific pathway improvements are being planned and designed.</p> <p>In conclusion, FORCE hopes and intends that the above comments are helpful and constructive. We would welcome the opportunity to discuss any of the above issues with officers as the Local Plan is further developed, and we look forward to engaging in the process.</p>	<p>Regarding the proposal of widening the pathway along the River Crane, this is not an adopted public right of way so is not maintained by Richmond Council. However, improvements to it could be secured to mitigate the impact of development as long as any proposal met the criteria set out Regulation 122 of the CIL Regulations (2021).</p> <p>The A316 is maintained by TfL as part of the TLRN. Any mitigation sought from a development to mitigate the impact on it would need to pass the same national tests set out above.</p> <p>Richmond Council has a duty to consult neighbouring Boroughs on major planning applications that might have a material impact on the services they deliver and/or that their residents use. Likewise, the Council has a duty to respond to applications in neighbouring Boroughs and ask for mitigation where it believes that mitigation will pass the three tests set out above.</p>
1053	Melanie Gurney, The Planning Lab, on behalf of the Royal Botanic Gardens	Policy 47	Part I of Policy 47 (Sustainable travel choices) confirms that, where appropriate, taxis, minibuses, coaches, and private hire vehicles can be safely accommodated. RBGK have seen a reduction in coach parking in recent years which is unfortunate, given that this provides an efficient and sustainable way for visitors to major visitor destinations such as Kew, to get to and from the site with reduced vehicular journeys. Therefore, RBGK support this policy and request that existing coach parking on surrounding streets is retained and, where possible, improved. RBGK also support improvements in public transport infrastructure to reduce car trips. However, the need for sufficient car parking in association with its visitor and specialist staff needs remains an important part of daily operations.	<p>The London Plan does not have a maximum off-street parking standard for coaches, so it is difficult for Planning Officers to demand a certain number of coach parking spaces with new developments because they cannot demonstrate, through policy, that it is necessary to make a development acceptable in planning terms. The only evidence the Transport Planner has to make the case for individual developments to provide coach parking is the forecast number of coach trips, or, as is sometimes the case with hotels, the applicant offers it.</p> <p>The policy has been amended in part I to clarify that where the public highway needs to be used to drop off and pick up passengers this should only be in the absence of any alternative to do this off the highway and for the minimum time necessary.</p>
1054	Paul Luton, Cycling UK	Policy 47. Sustainable travel choices (Strategic Policy) – 23 C	23 C Cycling Proposals should adhere to LTN 1/20 ,unless physically impossible, as the most up to date specification	Reference to this guidance has been included in part C of the policy and paragraph 23.4 of the supporting text, alongside other guidance.
1055	Paul Luton, Cycling UK	Policy 47. Sustainable travel choices (Strategic Policy) – paragraph 23.8	23.8 suggest replacing "create a high-quality core cycle network connecting popular destinations; .with "create a high quality boroughwide cycle network linking people's homes with schools, workplaces, shops and other destinations. "	<p>Suggested change not considered necessary as supporting text already contains similar wording.</p> <p>Refer to LIP 3 and Richmond Active Travel Strategy for details of borough's cycle network.</p>
1056	Paul Luton, Cycling UK	Policy 47. Sustainable travel choices (Strategic Policy) – paragraph 23.12	23.12 Management of other users should include "excluding through traffic from residential roads as LTNs." Maybe "protected lanes rather than "segregation".	Officers do not think there has been a LTN in Richmond, but there are a number of school streets. Amendment to paragraph 23.12 to refer to 'traffic calming measures' instead of specifically LTNs.
1057	Paul Luton, Cycling UK	Policy 47. Sustainable travel choices (Strategic Policy) – paragraph 23.13	23.13 – this should also extend to NCR 4 in the borough and the local cycle network. (if we had one)	Officers agree and this paragraph has been amended.

1058	Louise Fluker, The Richmond Society	Reducing the need to travel and improving the choices for more sustainable travel p 283, Paragraph 23.11 (and elsewhere)	Developments must be permeable on foot and by cycle if appropriate.	Officers agree and this is already reflected in part C of the policy.
1059	Louise Fluker, The Richmond Society	Reducing the need to travel and improving the choices for more sustainable travel p 283, Paragraph 23.14	Promoting new access routes and transport links should not cause consequential harm to the amenity of existing users of the route or nearby residents.	Comment noted.
1060	Louise Fluker, The Richmond Society	Reducing the need to travel and improving the choices for more sustainable travel p 283, Paragraph 23.24	Local Plan needs to recognise that taxis and PHVs (and mopeds) are increasingly being used to make deliveries from food businesses and dark kitchens (e.g. UberEats). These vehicles aren't using taxi ranks but need to be managed whilst waiting to avoid bringing harm to other road users.	This is generally beyond the scope of planning but the Local Plan does ask for robust trip generation assessments relating to service trips for development proposals. However, the law states that you can stop on a double yellow line, unless you are obstructing the highway, and unless a TMO says otherwise, and you can prove your delivering/unloading, for up to 15 mins.
1061	Luke Burroughs, Transport for London (TfL) Commercial Development	Policy 47. Sustainable travel choices (Strategic Policy)	<p>The policy states the following <i>"The loss of existing bus garages will also be resisted, to safeguard capacity for efficient and sustainable operation of the network, unless it is demonstrated that it is operationally no longer needed or enhanced provision has been made elsewhere in a convenient and accessible alternative location."</i></p> <p>The wording of this policy as drafted does not recognise that the bus operations can also be made more efficient and sustainable as part of the redevelopment of bus garage sites. We would suggest that the wording of this policy could be changed to "...or enhanced provision has been made <i>as part of a redevelopment of the site</i> or made elsewhere..." to support the redevelopment of bus garage sites where it is appropriate and in line with policy H1 and T1 of the London Plan.</p> <p>Concluding Remarks We hope that these representations are helpful but if you require any further information or would like to discuss any of the issues raised in our representations, please do not hesitate to contact me</p>	<p>Paragraph 23.21 has been amended and also seeks to make it clear that it will need to be confirmed by Transport for London that the re-provision is acceptable:</p> <p>The loss of existing bus garages will also be resisted, to safeguard capacity for efficient and sustainable operation of the network, unless it is demonstrated, <u>and confirmed by Transport for London</u>, that it is operationally no longer needed or enhanced provision has been made <u>as part of the redevelopment of the site or elsewhere in a convenient and accessible alternative location</u>.</p>
1062	Nina Miles, GLA on behalf of Mayor of London	Policy 47. Sustainable travel choices (Strategic Policy)	<p>Transport for London (TfL) has provided detailed comments, attached below at Annex 1. [See comments under Richard Carr, Transport for London (TfL) in this schedule]</p> <p>We welcome the references to Active Travel throughout the Plan and in strategic transport Policy 47 as well as the intention to safeguard land required for transport schemes set out in the London Plan. This safeguarding should be extended to existing transport infrastructure as well as future schemes in accordance with Policy T3 LP2021.</p> <p>It will be important to ensure that the transport chapter identifies the need to secure land for transport and outlines future plans and proposals in line with Policy T3 of the LP2021 and the emerging Sustainable Transport, Walking and Cycling London Plan Guidance (LPG). The Plan should identify walking and cycling networks and any gaps or potential improvements, as advised in the LPG.</p>	<p>Part H of the policy has been amended to:</p> <p>Where appropriate, ensure that their development proposals safeguard land required for transport schemes <u>and infrastructure</u> set out in the London Plan and/or the Council's Local Implementation Plan.</p> <p>Paragraph 23.21 outlines the Council's approach to safeguarding routes and facilities.</p> <p>Details of the borough's strategic cycle routes and quietways is in the Local Implementation Plan (LIP)3 which may be updated along with other strategies such as the Active Travel Strategy.</p>
1063	Siriol Davies, Ham and Petersham Neighbourhood Forum	Policy 47 Sustainable travel choices	<p>The aims and aspirations of this section are in line with the Neighbourhood Plan and are updated in the context of the climate emergency and new London Plan.</p> <p>C. Active Travel We suggest that it is important to include that active and sustainable travel infrastructure should be installed prior to occupation of new development to enable new residents to make sustainable travel choices and support positive habit formation when people move. 72% of greenhouse emissions come from road transport (2017), and it is historically the slowest to reduce, yet with 3/4 of trips under 5 miles, it could respond quickly with behaviour change. Behaviour change needs to be designed for incentivised, over polluting travel and made the natural and safe choice for everyday journeys. By 'National Design Guide' can LBRuT confirm they are referring to LTN 1/20, or future equivalent? We support reference to Manual for Streets reinforcing the user hierarchy and importance of place-oriented streets. By 'Inclusive Mobility' can LBRuT confirm they are referring to Inclusive Mobility: a guide to best practice on access to pedestrian and transport infrastructure' or future equivalent? D. Inclusive mobility – we suggest that the Local Plan should address increasing issue of car charging cables across pavement which are a trip hazard. p.285 23.4 & 23.6 - Reference to 'Future improvements' does not acknowledge that habits are formed when people move/during life changes. Infrastructure to enable people to make sustainable and active travel choices needs to be implemented prior to occupation of new development. 23.11 – Taking into account additional travel demand of development and to support active travel. 23.12 It might be clarified that new design should meet the London Cycling Design Standards. 23.13 Support wayfinding and marking of routes. Cycle routes should be networked and identified by numbers in the same way as the road system to support navigation.</p>	<p>Officers agree about incentivising behavioural change in travel habits. Officers also agree that planning applicants must have regard to the national guidance such as that set out in the National Design Guide, LTN 1/20 Cycle Infrastructure Design (they are different documents), and Inclusive Mobility. LTN 1/20: Cycle Infrastructure Design has now been referenced in part C of the policy.</p> <p>Expanded reference in part D to Inclusive Mobility: <u>making transport accessible for passengers and pedestrians</u>.</p> <p>It is noted in the supporting text that applicants should refer to the most recent guidance on inclusive mobility.</p> <p>Richmond Council's position on cables running across footways it maintains to charge vehicles is that it is tries to approve them in instances where they do not obstruct the footway and are not a trip hazard. All cables need to be covered with plastic covering that is visible to all road users including vulnerable ones. Residents who have front yard parking and a crossover must provide their own means of charging on their property and must park their car on their driveway to charge.</p> <p>Most future improvements which are secured to mitigate the impact of a development in accordance with the NPPF and R122 of the CIL regulations of 2010 are built or implemented prior to the first occupation of the development or are phased to reflect the timing of the impact they are mitigating. For example, if a new school creates 50 more bus trips at the peak hours in its first year, and TfL Officers conclude that these can be accommodated on the existing bus network without leading to buses being overloaded, but creates 150 new bus trips at these times in its third year, which TfL Officers say cannot be absorbed safely on the existing network, TfL will request that a financial contribution be paid prior to the start of year 3 of the operation of the development site.</p>

				23.12 already sets out requirements in relation to cycle design standards, including reference to the London Cycling Design Standards. Note response in relation to numbering cycling routes which seems to be a broader comment beyond the scope of this Local Plan. Comment noted.
-	John Waxman, Crane Valley Partnership	General in relation to river corridor enhancement and active travel	[See comment 209 in relation to river corridors]	
1064	Suzanne Parkes, Elmbridge Borough Council	Policy 47. Sustainable travel choices (Strategic Policy) - Greener transport and how we move around	We support Policy 47 'Sustainable travel choices' by locating development closer to the public transport network, encouraging active travel and making accessibility easier in Richmond. Though, it is unclear what the proposed major developments are as 'Table 1' does not exist in the document and this requires clarification. Whilst Surrey County Council is the Local Highways Authority for the Borough, we would welcome direct discussions on opportunities for connecting our two boroughs through active travel means.	Noted, part B amended to refer to Table 23.1.
-		Policy 48. Vehicular Parking Standards, Cycle Parking, Servicing and Construction Logistics Management		
1065	Richard Carr, Transport for London (TfL)	Paragraph 23.10	23.10 When referring to London Plan minimum standards for cycle parking, it is helpful to add that developments that exceed minimum cycle parking provision will be encouraged.	Paragraph 23.10 amended to state: Cycle parking should, <u>at least</u> , be provided in accordance with the minimum standards in the London Plan.
1066	Nina Miles, GLA on behalf of Mayor of London	Policy 48.Vehicular Parking standards, Cycle Parking, Servicing and Construction Logistics Management	We are pleased to note the intention to adopt London Plan parking standards in Policy 48 and the encouragement of car free development in accordance with Policy T6 LP2021. We would also expect to see this approach reflected in the Site Allocations.	Comment noted. The Site Allocations seek to strike a balance between provision of car parking, encouraging active travel and highways safety. Where parking has been referred to in a Site Allocation it will be clarified that it should be to London Plan parking standards. Additional references have also been included in those Site Allocations to the need to include pedestrian routes where possible and encourage active travel. Not all sites within the site-specific allocations will be suitable for car-free development, and the list of criteria in part E of the policy will apply.
1067	Richard Carr, Transport for London (TfL)	Paragraph 23.21	23.21 We welcome safeguarding of bus garage facilities, but it should be made clear that in all cases TfL agreement will be needed to confirm that any replacement facilities are fit for purpose and capable of being delivered, or that existing facilities are surplus to requirements. This will take into account the need for additional space to accommodate alternative fuel facilities.	Para. 23.21 amended to reflect the need for agreement with TfL on the issue.
1068	Clare Snowdon	Paragraph 23.25	23.25 This needs to be balanced against the issues of excessive paving and loss of valuable green space and flooding adaptation	The Council agrees that off-street parking in developments should seek to minimise the impact on provision of green space and flood mitigation. The draft Local Plan adopts the maximum parking standards in the London Plan which are less arduous than the adopted Local Plan.
1069	Rosemary Harrison	Draft Local Plan: Page number(s) 289-292 (passim - comments largely relate to what has not been included), Policy 48	Car Clubs Currently the Borough only grants spaces to the most expensive profit-making car clubs available. Has consideration been given to involving a non-profitmaking one which would be less so? (Co-wheels was as I understand it recently forced out of its former limited presence in other Greater London boroughs by high costs.) Previously I have been given to understand that car clubs in Richmond Borough have to pay for their on-street spaces at a rate very much higher than even the second car rate for residents:surely this policy (if still in place as it was when I enquired in 2017) is counter- productive in relation to reducing car ownership? Waiving this cost might enable lower fees to be negotiated with even the commercial car clubs (as has been achieved by, for example, Nottingham and a number of Scottish cities).	Developers pay for the standard TMO fee and cost of any highway works to allow a car club space on the highway when one cannot be installed within a development. Part I of the policy has been amended to state that developers must secure an accredited car club operator to operate the car club from the spaces provided as part of a development.
1070	Rosemary Harrison	Draft Local Plan: Page number(s) 289-292 (passim - comments largely relate to what has not been included), Policy 48	Parking - CPZ and for new developments I welcome the general approach that new developments will not necessarily be associated with the right to resident parking. However I believe that this should be accompanied by a more general radical approach to CPZ parking rather than individual developments being considered in isolation in these areas. The Council causes a significant problem in my local CPZ (CPZ X – but what I say probably applies elsewhere) by placing no restriction on the number of resident parking badges each household can have, instead of allowing one badge per household as of right, with others only issued up to a maximum that is practicable in relation to the spaces available, taking into account the number already issued. (Clearly it would only be reasonable to improve this gradually, introducing a limit on the right to a second badge on change of property ownership/rental tenancy, so that individuals know what their "deal" will be before moving to the area.) Having no car of my own I find it particularly irritating to have recurring problems because there is insufficient space for contractors' and delivery vehicles on an occasional basis: this is after all an occasional need that is actually fairly regular taken across the parking zone/street as a whole, which in the case of CPZ X the Hampton Wick Library car park only partly alleviates (especially as it only allows smaller vehicles). I have proposed to the Council in the past that there should be a large space that can be taken for a fraction of a day to help with this, using a resident visitor badge: such an arrangement would also mean that, if there were a limit on resident cars per household, those households which were not able to obtain a second badge would have the capacity to load/deliver near their property if they still retained a second vehicle garaged elsewhere. (In marginal cases it might mean that a household might find less need for a second car.) Such a broader- based approach to parking restriction would make it easier to justify not allowing resident parking for new developments.	The approach suggested would be very resource intensive because the Council would have to commission on-street parking stress surveys every time any resident applied for a permit above the one permit they would be allowed as a right, to verify whether there are enough spaces available to allow the Council to sell additional permits over and above one per household. The policy sets out the circumstances in which a planning applicant will need to complete an on-street parking stress survey to support their case as to whether occupants should be included in or excluded from a CPZ.

1071	Richard Carr, Transport for London (TfL)	Policy 48.Vehicular Parking standards, Cycle Parking, Servicing and Construction Logistics Management	<p>We strongly support the requirement to provide cycle and vehicle parking in line with London Plan policies and standards, including reference to London Cycling Design Standards. Where parking is provided, a Parking Design and Management Plan should be submitted with the application.</p> <p>In part F we welcome the encouragement of car free developments in PTAL 3 or above.</p> <p>In F5, where CPZs are not already in place it would be appropriate to encourage developments to provide funding towards implementation of a new or extended CPZ (or equivalent parking controls).</p> <p>In F8, it may not be appropriate to require car club spaces to be provided in developments in areas of very good connectivity where alternatives to car use can provide for all travel needs.</p> <p>In part G, there may be a need to consider on street disabled persons' parking spaces on constrained sites that are otherwise suitable for car free development. We can provide advice on how this works in other boroughs if helpful.</p> <p>In part H, where there is physically no possibility of accommodating short stay cycle parking on site, on street provision may need to be considered as set out in paragraph 23.35.</p> <p>In part I, it may not be appropriate to require car club spaces to be provided in developments in areas of very good connectivity where alternatives to car use can provide for all travel needs.</p> <p>In part L, it is helpful to refer to TfL guidance on Delivery and Servicing Plans.</p> <p>In part M, to ensure consistency with London Plan and TfL, it would be helpful to refer to Construction Logistics Plans rather than Construction Traffic Management Plans.</p>	<p>The Council can and does seek S106 funding from Developers for reviewing, changing, and implementing CPZs, when the requests meet the criteria set out in R122 of the CIL Regulations of 2010. Part F.5. has been amended to reflect this.</p> <p>Regarding not asking Developers of large sites in areas with a high PTAL to provide car club spaces, the Council's view is that we should allow residents to access car club vehicles, as they help reduce car ownership by providing people with the use of a car when, on the rare occasions they need one.</p> <p>Part G – noted, whilst the Council may consider provision of on-street disabled parking as part of a development, but only where there is absolutely no alternative to do so on site. Whilst this can be considered on a case-by-case basis, we do not want to encourage it in policy. There are significant constraints and costs associated with providing disabled parking spaces on-street, particularly in Richmond borough where on-street spaces can be scarce.</p> <p>Part H – noted.</p> <p>and has been amended to include the following guidance:</p> <p>If this is not possible, they will need to contribute to the cost to the Council of installing bike hangars or other cycle stands, including TMOs or other highway works needed to facilitate this.</p> <p>Part I – (see above).</p> <p>Part L – noted and changes made.</p> <p>Part M – noted, change made. (also in part N)</p>
1072	James Armstrong, Richmond Cycling Campaign	Policy 48. Vehicular Parking standards, Cycle Parking, Servicing and Construction Logistics Management.	<p>RCC is in overall support of policy 48, including a number of positive policies for improving on and off street cycle parking provision, as well as reducing car dominance. Whilst we understand the need for compliance with the London Plan, the council should explore options to further reduce the number of motor vehicle parking spaces provided with new development, as well as allow for the provision of a greater amount of off and on street cycle parking, including allowing the replacement of on street car parking spaces with secure cycle parking (i.e. lockable cycle shelters featuring anchor points for cargo and non-standard cycles). We suggest the following improvements (changes preceded and followed by asterisks:</p> <ul style="list-style-type: none"> - A. [...] while minimising the impact *and use of* of car-based travel [...]. - B Vehicular and Cycle Parking Standards. [...] provide off-street vehicular and cycle parking, including electric vehicle charging points *and provision for cargo and non-standard cycles* in accordance [...]. - B. Vehicular and Cycle Parking Standards. It should be clarified that whilst electric car charging points are to be provided, this must be done in a way that is not detrimental to the safety of vulnerable road users, avoids unnecessary street clutter, does not detract from pedestrian, cycle or wheelchair user amenity, and wherever possible (when provided on street) are provided on the highway, rather than on pavements. - C. Vehicular and Cycle Parking Standards. The meaning of "well located" should be clarified. Cycle storage must be located such that it is more easily accessible and convenient than car storage, i.e. next to the building entrance, safe, secure and easy to use by people of all ages and abilities. - F. Car-free developments. The deletion of points 4 & 5, or the increase of on-street parking stress permitted to a significantly higher level than 85%. Continued provision of additional parking places (on or off street) perpetuates the dominance of space in the borough by motor vehicles. Cars spend around 95% of their time parked and not in use, stored on public land at no, or a very low cost to owners, but at high cost to to Richmond council (https://www.reinventingparking.org/2013/02/cars-are-parked-95-of-time-lets-check.html). Car free developments are an excellent way to discourage motor vehicle ownership, and must not be constrained by parking stress in the local area, as without the incentive to avoid car ownership provided by high levels of parking stress, much of the impact on travel choices of car free developments is lost. - H. The Provision of Vehicular and/or Cycle Parking Infrastructure on the Highway. Planning applicants will be expected to provide all long and short stay cycle parking off-street, *or through the provision of lockable on-street cycle shelters*. - I. Car Club Bay and Membership Provision. One off-street Car Club space per 100 dwellings is insufficient for the scale of use that could be expected from such a development. Car clubs are a positive measure, but only if deployed at scale can they contribute to reductions in motor vehicle ownership. If a vehicle is not reliably available, car club membership will only ever remain a supplement to owning a car, rather than a replacement. <p>23.25 - Deletion of "The approach aims to ensure that sufficient on-site car parking is provided to meet the needs of the occupiers of the new development, but also to ensure that excessive on-street parking demand is not created which could have an adverse impact on local highway/traffic conditions, street scene and impacts on making the best use of land".</p> <p>23.27, 23.28 & 23.29 - Deletion of these policies, as per explanation regarding policy 48.F.</p> <p>23.35 - The Provision of Vehicular and/or Cycle Parking Infrastructure on the Highway. Deletion of the phrase "where there is local support for the Traffic Management Order required to install them". It seems illogical that public opinion gathering exercises are to be carried out for the installation of cycle hangars, whilst no such requirement is necessary for a resident to store</p>	<p>Provision of vehicular parking should be in line with London Plan parking standards. Part E of the policy provides the criteria for the consideration of where car-free developments may be appropriate.</p> <p>It is not possible to use a new development as an excuse to take away existing on-street parking without either a TMO, an order to stop up a highway, or otherwise to make a development acceptable in planning terms.</p> <p>Part A – the amendment is not considered necessary (impact can encompass use of cars).</p> <p>Part B – While the London Plan does not specify parking standards for cargo bikes and non-standard bikes, the London Cycle Design Standards does include a requirement for 20% of spaces to be for large bikes (this is referenced in the policy).</p> <p>The pavement often is highway maintainable at public expense.</p> <p>We will look to make sure applicants who are going to provide any car parking do so off-street wherever possible, including electric vehicle charging points. We would not allow developers to install EV charging points on the adopted highway as EV charging points on the highway are for public use, and not exclusively for occupants of a development.</p> <p>The following text has been added to part B:</p> <p>Electric vehicle charging points must be provided in a way that ensures the development is safe for other road users.</p> <p>Part C – 'well-located' is noted as preferably being close to the pedestrian entrance of the main building'. It has been added that this should be and easy to use by people of all ages.</p> <p>Part F – Retain parts 4 and 5. This threshold of 85% for on-street parking stress exists because of the impact of overspill parking on highway safety if it is left unchecked.</p> <p>Part H – Regarding lockable on-street cycle shelters, see Par. 23.35. Policy amended to state that If this is not possible, they will need to contribute to the</p>

			<p>their motor vehicle (often much larger than a cycle hangar) for extensive periods of time on the street. Especially if the cost is to be covered by a developer through a S106 agreement.</p>	<p>cost to the Council of installing bike hangars or other cycle stands, including TMOs or other highway works needed to facilitate this.</p> <p>Part I –provision in the policy is considered to be the outer limit of what is commercially viable for car club providers.</p> <p>23.25 – The Council has a statutory duty to ensure the highway is safe for all road users and that developments do not cause a severe impact on highway safety. Minimising the impact of overspill parking from them on highway safety is part of this.</p> <p>23.27-23.39 – see above.</p> <p>23.35 – a TMO is a statutory process to change the regulation of vehicular parking and movement on the highway, not a public opinion gathering exercise.</p>
1073	Alice Shackleton, on behalf of The Kew Society	Policy 48 Parking	<p>As a general comment, although Electric Vehicle Charging points are proposed/required in certain developments, the use of electric vehicles (just like petrol or diesel vehicles) requires parking facilities. No acknowledgement of this is made as a separate matter of parking, and electric vehicle parking is included in the required reduction of all vehicle parking (with some accommodation for disabled). This seems inconsistent - air quality improvements due to electric vehicle use must occur, charging facilities must be provided: where are they to park?</p> <p>E - car free developments for PTAL3 or above, but PTAL3 is only moderate. Surely, policy must have regard to this so that car-free developments should be considered where there is good public transport - PTAL 4 at least.</p> <p>F 4 - CPZs control parking within certain hours. Realistically, where new developments preclude residents from CPZ permits, those residents can park in the CPZ areas outside the controlled hours, thus increasing parking stress for residents in the CPZ. Whilst the Council wishes to use the local plan to restrict vehicle usage, realistically people do use cars and will increasingly have deliveries of goods ordered online. Deliveries to households do not seem to be addressed.</p> <p>Creating car-free major developments may well increase congestion, parking stress and general difficulties for residents. This may detract from the "living locally" concept by simply increasing problems of everyday living for residents. A more realistic approach could be indicated. If Low Traffic Neighbourhoods are also developed, such difficulties will be exacerbated. Paragraph 25.23 acknowledges this but does not suggest any realistic solution.</p>	<p>Regarding the general comment, developers now have to provide 20% of spaces with active and 80% with passive means of electric vehicle charging. This is much more arduous than the previous standard in the 2016 London Plan.</p> <p>It is stated in Part E of the policy that car-free development <i>may</i> be appropriate in areas with a PTAL of 3 or above. The rest of the criteria in part E will also need to be addressed for car-free development to be considered appropriate. PTAL is therefore just a starting point and there are many other factors that will need to be taken into account, as outlined in the policy, to assess whether the impact of a development can be mitigated.</p> <p>True, some CPZs only operate from 10.00-12.00, which could, theoretically, mean that residents who are excluded from a CPZ can park in them. However, it is still inconvenient for them, as it means they have to move their car by 10.00 every day, even when not working/commuting/commuting by public transport. If you use the Census of 2011, you will find there are many households that own cars but do not use them to commute to work on a regular basis.</p> <p>Other than making sure large developments can be serviced off-street or providing loading bays on-street for clusters of smaller developments, subject to a TMO, the Council cannot use planning policies to prevent a delivery driver parking in a CPZ for a short time period.</p> <p>Car-free developments should not increase congestion if the mitigation set out in the policies is secured.</p>
1074	Tim Catchpole, Mortlake with East Sheen Society	Policy 48. Vehicular Parking Standards, Cycle Parking, Servicing and Construction Logistics Management	We support these policies.	Support noted.
1075	Jon Rowles	Policy 48. Vehicular Parking Standards, Cycle Parking, Servicing and Construction Logistics Management	Car-free developments are only mooted for areas with PTAL of 3 or above - but not everyone owns a car and it's not fair to make people pay for car parking they don't want or will not use. Maybe it would be better to shift away from wanting the highest number of 'pure' car-free developments and have a percentage of all developments that are car-free instead?	Normally, an off-street parking space within a development is leased or sold to the individual occupying a particular dwelling. TfL Officers often ask that spaces are leased rather than sold so that they can be reallocated easily when car owners move out of the development and turned into additional cycle parking if not used.
1076	Alice Roberts, CPRE London	Policy 48 Vehicular parking standards, cycle parking, servicing and construction logistics management	<u>Car free development is supported and more efforts should be made to use planning policy to restrict car parking and driving. We support proposals to restrict front garden parking (Policy 48).</u> Policies could ensure bus lanes, cycle lanes, pavements are given higher priority than	(Incomplete comment). The Council Agrees that sustainable transport infrastructure can and should be given high priority. However, any developer contribution towards the cost of their implementation has to meet the criteria set out in R122 of the CIL Regulations 2010.
1077	Siriol Davies, Ham and Petersham Neighbourhood Forum	Policy 48 B & C	<p>The location of electric charging points should be promoted within the new development parking provision. Charging points on the street encourage and embed on-street parking which detracts from the attractiveness, safety and amenity of the place. This policy should clarify the meaning of 'well located', to mean locating cycle storage so that it is easily accessible and convenient, i.e. near the building pedestrian entrance. It should also be safe, secure and easy to use by people of all ages and abilities.</p> <p>I. A single off-street car club space per 100 dwellings and thereafter 1 space per 200 dwellings seems far too low in the context of the need to reduce car trips, enable the reduction of car ownership and achieving net zero by 2050.</p> <p>Car clubs are the means and opportunity to reduce car ownership, and by aligning travel cost per journey more closely with the real costs to the environment and society they incentivise sustainable choices. i.e. Car clubs price per journey which is closer to real cost, whilst individual car ownership puts the majority of cost into the initial purchase and then future individual journey costs to the car owner are relatively small, whilst the cost to climate, society and safety are high.</p>	<p>Part C – Agree about the observation on cycle parking being well-located and policy wording has been amended to make reference to it being easy to use by people of all ages.</p> <p>Part I – On car club provision, this is what car club operators currently consider to be commercially viable. If that changes, so will the policy.</p> <p>Regarding making the cost of car club journeys as cheap as journeys by private car (after the up-front costs for the latter have been paid), there are a lot of variables that go into the cost of a car journey which the Council cannot control. We also need to make sure that commercially operated car clubs remain viable.</p>

1078	Louise Fluker, The Richmond Society	Reducing the need to travel and improving the choices for more sustainable travel p 283, Paragraph 23.39	This should be expanded to ensure that developers have fully considered and will manage the freight and servicing requirements of residential properties (i.e. not only business needs).	Noted, paragraph 23.39 has been amended to include some new text on servicing and refuse collection and alert applicants to relevant guidance.
-		Securing new social and community infrastructure to support a growing population		
1079	Heather Mathew, Richmond Council for Voluntary Service (CVS)	3 suggested key areas for inclusion - 2) Property	<p>2) Property</p> <p>The Voluntary Sector as owners/leaseholders of community buildings The Ethical Property Foundation produce a biannual “charity Property Matters Survey” (currently out for input for the 2022 report) In 2020, 200 not for profits in England and Wales contributed to the survey, 45% of whom were based in Greater London. The main property issues identified were affordability of premises, unforeseen cost of repair and maintenance, lack of inhouse expertise in property management, and the cost/difficulties of compliance with workplace regulations. They also found very low awareness of environmental regulations, most did not have a formal policy for environmental management of their property and just under half had no awareness at all of minimum energy performance standards. Local authorities were landlords to 35% of the sample, with 24% leased from another charity or public bodies. https://propertyhelp.org/help-centre/property-research-2020/</p> <p>The most common charity sectors represented in the survey were education, health and disability, village halls and community centres, culture, recreation and community development and this and the findings are also reflected in the local picture. From our work on the Richmond Community Fund we are very familiar with outdated community buildings in a poor state of repair in all areas of the borough with groups struggling to maintain and upgrade facilities, or complete basic and essential maintenance. This has been exacerbated in the last two years as income from renting space for community activity and meetings fell away, and membership fees for activity dropped with no alternatives to replace it. During the pandemic we worked with the council finance team to make eligible not for profits aware of the Government Retail Hospitality and Leisure Grants Scheme, and in doing so were surprised to find how many of those owned, leased or rented community buildings, many of which were owned by LBRUT. (18 scout and guide huts for example) Though many of these will feature on the “Right to Bid – Assets of Community Value” register this does not map the totality, and we have no clear understanding of their uses, the community they serve, and their value in terms of their role in supporting the 20- minute neighbourhood concept.</p> <p>With the emphasis on the reuse and conversion of existing buildings to minimise embodied carbon with a presumption in favour of refurbishment” (Spatial Strategy B Pg 25) it would also be very useful if the council mapped and reviewed its owned buildings and spaces which it leases to community groups, identified their maintenance/repair/refurbishment needs and prioritised them in term of urgency and benefit to the community. This would then allow for development infrastructure levies and investment to be used appropriately, and help to strengthen the social and physical infrastructure of the 20-minute neighbourhood, whilst also providing an ongoing maintenance timetable within the council estate.</p> <p>[See also comment 826 in relation to office accommodation and a VCS Hub]</p>	<p>Noted. However the Council considers there would be a difficulty in mapping and updating the existing sector. This is particularly in light of the flexible uses of spaces (for example there may be commercial uses which are then let for community use at certain times of the week), and monitoring through planning is difficult as the Government’s changes to the Use Classes affect social infrastructure and community infrastructure. Class F1 includes learning and non-residential institutions and Class F2 local community uses including halls and community spaces, indoor swimming pools and areas for outdoor sport or recreation, while Class E (commercial, business and services) is a wide range which includes gyms, indoor sport, creches, medical and health services. The flexibility introduced by Government through Use Class E (commercial, business and service uses) does in principle allow for changes of use both to and from other Class E uses for some types of social and community infrastructure, provided there are no restrictive conditions on a specific property. It would be a significant resource therefore to map such uses and keep up to date.</p> <p>The Local Plan supports provision of social and community infrastructure to meet local needs, with Policy 49 setting out the policy approach to retaining existing social and community infrastructure and assessing new or improved social and community infrastructure will apply where planning permission is required for a change of use, or to extensions and new development. Given the remit of the Local Plan, this is considered to provide an appropriate policy basis to inform decision-making on future planning applications.</p> <p>The Council’s own asset management process (the register of land and property assets is online), and possible funding streams to assist for example with environmental upgrades, are a matter beyond the remit of the Local Plan, and would be for owners/operators to consider.</p>
-		Policy 49. Social and Community Infrastructure (Strategic Policy)		
1080	Tim Catchpole, Mortlake with East Sheen Society	Policy 49. Social and Community Infrastructure (Strategic Policy)	No comment.	Noted.
1081	Vincent Gabbe, Knight Frank, on behalf of the Metropolitan Police Service	Policy 49. Social and Community Infrastructure	<p>LSH submitted representations on behalf of the Metropolitan Police Service (MPS) on the 18 of March 2020 to the Richmond Direction of Travel consultation. Representaions were also submitted on 24th January 2020 to the draft Planning Obligations SPD. These representations set out MPS's intention to seek section 106 contributions from major developments, to cover the cost of policing infrastructure required as a result of such proposals.</p> <p>Policy 49 (Social and Community Infrastructure) refers at part F to the need for major developments to assess potential impacts on existing social and community infrastructure and whether there is sufficient capacity to accommodate the needs arising from the new development. However, the draft Local Plan, the draft Section 106 SPD and associated Infrastructure Delivery Plan do not mention the intention of MPS to seek s106 contributions towards policing infrastructure. We believe that this should be explicitly mentioned, so that landowners and developers have a clear understanding of section 106 contributions that will be required.</p> <p>Policy 49 (Social and Community Infrastructure) should make clear under Part F exactly what social and community infrastructure will need to be assessed and make clear that this includes policing. The policy should also make specific reference to the intention of MPS to require section 106 contributions. If necessary, an appendix to the plan could be included to cover this important subject. The Infrastructure Delivery Plan and Section 106 SPD should also make reference to this.</p>	<p>Paragraph 24.17 in the Reg 18 Plan sets out that the impact of development on social infrastructure in part to ensure that there is sufficient capacity. It goes on to state that if mitigation is required, planning obligations are one of several means of achieving it.</p> <p>Policy 55 – Delivery & Monitoring, particularly section D, refers also to the requirement for planning applications where mitigation is necessary. The supporting text makes clear in what circumstances planning obligations are acceptable. The tests are:</p> <ul style="list-style-type: none"> • Necessary to make the development acceptable in planning terms. • Directly related to the development; and • Fairly and reasonably related in scale and kind to the development. <p>This section of the Plan has been updated to refer to the Infrastructure Delivery Plan 2023.</p> <p>Para 6.73 of the adopted Planning Obligations SPD refers directly to contributions to policing infrastructure and that such requirements may be secured through s106 obligations. This paragraph being added as a response to the MPS’ representations to the Planning Obligations SPD consultation.</p> <p>It is therefore considered that the issue has been addressed.</p>
1082	Laura Hutson, Sport England	Policy 49. Social and Community Infrastructure	Sport England notes that the supporting text for this policy outlines that proposals resulting in the loss of an indoor sports facility will be assessed against the Council’s evidence base for sport and the NPPF. Encouragement to engage early with Sport England is also welcomed.	Noted. The supporting text refers to early engagement with Sport England.

1083	Anna Russell-Smith, Montagu Evans on behalf of South West London and St George's Mental Health NHS Trust	Policy 49. Social and Community Infrastructure (Strategic Policy)	<p>Part C (Loss of Social or Community Infrastructure) part 2 states that: <i>"The potential of re-using or redeveloping the existing site for the same or an alternative social infrastructure use for which there is a local need has been fully assessed. This should include evidence of completion of a full and proper marketing exercise of the site for a period of at least 18 months in line with the requirements set out in Appendix 2"</i>.</p> <p>Part D goes onto state: <i>"Where the Council is satisfied that the above evidence has been provided and the change of use away from social and community infrastructure use has been justified, redevelopment for other employment generating uses should be considered"</i>.</p> <p>To be consistent with other approaches within the emerging Local Plan Part D should be amended to reflect other alternative uses that could be considered appropriate, for example residential, when looking at the potential for sites. This would reflect London Plan policy 5.2.9 which states that <i>"development and regeneration proposals for an area provide an opportunity to re-think how land and buildings are used and whether there is a more optimal configuration or use of that land. Hospital reconfigurations are an example where more intensive and better use of a site can lead to a combination of improved facilities and the creation and release of surplus land for other priorities."</i></p> <p>It is therefore considered that other priority uses, such as residential accommodation, should be included within part D (or a new point added) to ensure that the development potential for suitable, deliverable and available brownfield sites is optimised.</p>	<p>Policy 49 sets out the Council's approach to sites where proposals involve the loss of social infrastructure. Sections D & E relate to the acceptability of other land uses where the loss of the social and community infrastructure has been justified. In such cases the policy supports change of use to other employment generating uses. Furthermore, schemes for 100% affordable housing (meeting the requirements of Policy 11) will not be required to demonstrate that site cannot be re-used or re-developed for a social infrastructure use, nor supply marketing evidence. Clearly, it would not need to be redeveloped for an employment generating use.</p> <p>It is considered that there is sufficient flexibility in the policy for change of use and to facilitate the best use of land whilst ensuring that the need for social infrastructure is met in line with this policy and London Plan policy S1.</p>
-	Martin Ellis, South West London Clinical Commissioning Group (CCG)	Healthy lifestyles and living locally	[See comment 271 on Policy 1 Living Locally]	<p>Noted. See also response to comment 271 on Policy 1.</p>
1084	Martin Ellis, South West London Clinical Commissioning Group (CCG)	Policy 49. Social and Community Infrastructure (Strategic Policy)	<p>We generally support the approach to protect social and community infrastructure (clause C), which would include healthcare. However, when considering the redevelopment or disposal of surplus NHS sites we consider that the policy should be sufficiently flexible to allow the loss of a facility, or part disposal of a site, where declared surplus to requirements in accordance with NHS service transformation and estate strategies. The redevelopment of NHS sites and the introduction of housing and other uses provides vital investment to re-invest in new and improved health facilities which are fit for purpose. This flexibility would accord with clauses F and G of London Plan Policy S1.</p> <p>We support Clause F of the policy. For healthcare, the impact of the development and assessment of capacity is addressed in a health impact assessment. We suggest that there is a cross-reference to Clause B1 of Policy 51. For large development proposals subject to environmental impact assessment the socio-economic impact is typically included in the assessment. We suggest additional wording to state that there is insufficient capacity to accommodate the needs arising from the new development that developer contributions are sought to mitigate this impact. For healthcare, the Planning Obligations SPD (June 2020) identifies the steps that should be taken to identify existing capacity.</p>	<p>Supporting text to be amended to include additional references to the NHS service transformation plan and estate strategies.</p> <p>Clause F – Support noted.</p> <p>Agreed. Cross-reference to Clause B1 of Policy 51 to be added.</p>
-	Martin Ellis, South West London Clinical Commissioning Group (CCG)	Loss of health facilities	[See comment 1115 on infrastructure; and social and community infrastructure against Policy 51]	<p>Support noted, including for approach to HIAs. Add an additional clause to refer to housing design, as paragraph 25.10 refers to this only in the context of older people and paragraph 17.45 already links adequate space in the home to health. Noted the point about duplication in clause B.4 and B.5, however it is felt that an explicit reference to loss of existing health facilities is useful in Policy 51, to make the policy approach clear as this could apply to a range of (public and private) health uses. Update the supporting text to reflect the South West London Integrated Care System has come into effect. Paragraph 24.12 will be updated, but no change is considered necessary to paragraph 25.21 as it refers to the relevant health body.</p>
-		Policy 50. Education and Training (Strategic Policy)		
1085	Alice Roberts, CPRE London	Policy 50 Education and Training (Strategic Policy).	<p>In working with others to identify sites, it should be explicitly stated that such searches should not include protected green sites or other important green infrastructure. We suggest the borough commissions an independent sequential site search for new primary, secondary and special schools. This could lead to safeguarding of sites in each category.</p>	<p>All policies in the development plan, including those protecting open land, would need to be taken into account in any future search. Given the Site Allocations identified in the borough with potential to meet future needs for schools (Stag Brewery, Barnes Hospital, Kneller Hall, and the American University) and the limited opportunities for large sites in the borough, it is not considered necessary at this time to undertake site searches and safeguard sites in particular categories. The Local Plan seeks to meet development needs for a balanced mix of land uses, where there are reasonable prospects of an application coming forward for the allocated use. Along with safeguarding existing land and buildings in education use, the Site Allocations in the Plan contribute to delivery to meet identified future needs in the School Place Planning Strategy, but proposals will be brought forward by landowners outside of this process as set out in the NPPF strategic policies in Local Plans look ahead over a minimum 15 year period, with reviews every 5 years to assess whether they need updating.</p>
1086	Unity Harvey	Policy 50. Education and Training (Strategic Policy) Page 301	<p>I fully support the proposed new secondary school on the Stag Brewery Site. The children of Barnes and Kew particularly need this. There is a large choice of school on the Surrey side of Richmond and only 2 on the eastern side. My own 3 children, now all over 50 years of age, had to commute for over 2 hours a day to Ham – equivalent to a whole day at work each week - tiring... This burden on our children has been going on for too long and they deserve better than this. I feel that the new co-ed non-</p>	<p>Support noted.</p>

			denominational school can only help. I would hope that the policy enforces the <i>retention of the whole of the existing playing field is retained as green space for the school use too</i> as a real grass playing field.	
1087	Jon Rowles	Policy 50. Education and Training (Strategic Policy)	<p>24.26 “due to the Greenwich Judgement, places in local schools cannot be reserved only for children resident in the borough.” Incorrect – schools can have admission priority areas, they just can’t be set just on the basis of excluding out of borough pupils. Greenwich Judgement was mainly about Greenwich Council not allowing out of borough pupils to attend its schools despite having places available. This was confirmed in the recent Turing House School adjudication and where Hounslow Council said they would prefer schools in Richmond to have Admission Priority Areas but Richmond Council said they were opposed to them on the grounds that it would confuse parents.</p> <p>24.32 The Council will work with the Education and Skills Funding Agency, Department for Education, landowners and other partners to identify and, where necessary, allocate sites for the future provision of schools to meet the needs of local communities and enable the Council to meet its duty under the Education Act. Ongoing work is taking place to identify other potential sites for educational uses in the borough.</p> <p>The Royal Town Planning Institute in their practice advise 'Probity and the professional planner' state there must be safeguards put in place to protect against any questions of bias by the local authority; there must be a separation of interests; ideally, the proposals should be promoted through the local plan s that proposals are tested through independent scrutiny or that independent advice is taken. Independent sequential site reports should ideally be commissioned and sites promoted through the local plan so that they can maintain their professionalism and public confidence in the planning system. (Page 10 https://www.rtpi.org.uk/media/3974/probity-and-the-professional-planner-final.pdf)</p>	<p>Schools are not able to grant priority to children on the basis of residence within the borough; that is because of the 1989 High Court ruling against Greenwich Council (the Greenwich Judgement’).</p> <p>See also response to comment 1085 in relation to an independent sequential site report. Noted the RTPI’s practice advice referred to is in relation to tips for managing local authority development, and there are a number of ways suggested to maintain internal information barriers.</p>
1088	Tim Catchpole, Mortlake with East Sheen Society	Policy 50. Education and Training (Strategic Policy)	No comment.	Noted.
-	Max Millington	Policy 50. Education and Training (Strategic Policy)	[See comment 196 in relation to education and school place planning, relating to Stag Brewery site, including consideration of alternative sites for location of secondary school if required]	See response to comment 196.
-		Creating safe, healthy and inclusive communities		
1089	Nina Miles, GLA on behalf of Mayor of London	Creating safe, healthy and inclusive communities	The policy approaches towards creating safe, healthy and inclusive communities are closely aligned with the Mayor’s Good Growth Objective GG1, Building strong and inclusive communities.	Support noted.
-		Policy 51. Health and Wellbeing (Strategic Policy)		
1090	Heather Mathew, Richmond Council for Voluntary Service (CVS)	Community safety	<p>Community safety – there is mention of it in relation to food and night club licences- ASB and noise but no systematic thought to improving and enhancing both physical spaces and residents’ sense of safety. It does not appear to feature in policy 25 “ Creating Safe, Healthy and inclusive communities (pg 304) Since the murder of Sarah Everard in 2021, there has been increased concern, and local activism relating to public safety – safer streets – reduction in violence against women, street lighting, stop knife crime etc and this needs to be factored in when developing neighbourhoods and thinking about the night time economy. This is captured to a certain extent by “Policy 28 – local character and design quality 11. Minimise opportunities for crime and ASB, based on an understanding of the locality and site-specific circumstances utilising principles of natural surveillance and orientation of buildings as well as uses” but the plan would benefit from overt reference to residents’ concerns regarding public safety and measures to work with them to increase public confidence through the planning of the physical infrastructure of neighbourhoods.</p>	<p>Add broader references to the community safety agenda in the supporting text, and cross-reference where this is addressed elsewhere in the Plan (e.g. Policy 43. recognises the benefits of floodlighting for safety of movement).</p> <p>Note the Council consulted in Autumn 2022 to inform a new Community Safety Strategy to be launched in 2023 by the Richmond Community Safety Partnership. This will identify the crime, anti-social behaviour and community safety issues for the Partnership to prioritise. The Joint Strategic Crime Assessment 2022 sets out that the borough has had the lowest crime rate in London for the last three years. The Council is committed to developing an ambitious, long-term strategic approach to ending violence against women and girls (VAWG) and adopted the Violence Against Women and Girls Strategy 2022-25. Much of this is about the cultural and behavioural shift needed, but it is relevant to consider the relevance of gender-neutral spaces that includes walkability, mixed-use environments, a safe public realm and open green spaces – therefore inclusive design and policies across the Plan will be relevant to achieving this.</p>
1091	Tim Catchpole, Mortlake with East Sheen Society	Policy 51. Health and Wellbeing (Strategic Policy)	No comment.	Noted.
1092	Alice Shackleton, on behalf of The Kew Society	Policy 51 Health and well-being	<p>Again, it is important to be inclusive of older people. Not all older people are disabled or suffering from dementia. Increasingly, older people are fit and active but not as fit as the young. They may no longer be able to walk long distances (which will be shorter than the equivalent long distance for a young person) or cycle for long distances or at all. Public transport is being reduced in the Kew area - with the reduction in bus services at Manor Circus and South West Trains reduction of service from North Sheen station. Most of Kew has a PTAL of 2 - "poor". To walk to Kew Gardens Station from the Kew Riverside developments or parts of North Sheen may be a short distance for a young person but may be too far for an older person to contemplate or anyone who is not so fit. These people may need to use a car to get around. They should not be excluded or just considered as an aspect of adult social care.</p>	<p>References in Policy 51 are to promote active travel and access to public transport, and reduce car dependency (part A.1), but also to provide safe, inclusive development that consider the needs of all, including the older population (part A.7). The Plan encourages aspects such as seating, wayfinding, that may benefit older people to continue to enable older people to be more active.</p>
1093	Laura Hutson, Sport England	Policy 51. Creating safe, healthy and inclusive communities	<p>Sport England is fully supportive of this policy, which aims to promote healthy lifestyles and reduce health inequalities in line with our own aims. Many of this policy’s aims (sustainable travel, access to green infrastructure, access to public toilets and free drinking water in public locations) are fully in line with Sport England’s own Active Design guidance.</p> <p>[See also comment 945 in relation to Uniting the Movement and Active Environments]</p>	Support noted.
1094	Jon Rowles	Paragraph 25.14	<p>Takeaways 25.14</p> <p>These types of policies have had a limited impact – and some boroughs are replacing them with ‘healthy food neighbourhoods’ & ‘School Super Zones’ and I feel that Richmond need to investigate these alternative measures.</p>	<p>This approach is in line with the London Plan Policy E9 part D. National guidance is clear that planning policies can limit the proliferation of certain use classes in certain areas, and that regard should be had to locations where children and young people congregate including schools. The Richmond Health and Care Plan (refreshed for 2022-24) sets out that 4.7% of children in Reception are obese and</p>

				this more than doubles to 11.1% of children by the time they reach Year 6. Prevalence of obesity (3-year combined data) from 2017/16 - 2019/20 at Reception to Year 6 nearly doubled from 5.2% to 11%. Therefore policy approach is considered justified alongside other public health initiatives taken by the Council and health bodies.
-	Ben Fox, Planware LTD on behalf of McDonald's Restaurants LTD	Policy 19. Managing impacts & Policy 51. Health and Wellbeing (Strategic Policy)	[See comment 814 in regard to takeaways]	-
1095	Ziyad Thomas, Planning Issues Ltd on behalf of Churchill Retirement Living and McCarthy Stone	Policy 51. Health and Wellbeing (Strategic Policy)	<p>We welcome the Council's commitment to the health and wellbeing of its residents. As detailed in our representation to Policy 12. Housing Needs of Different Groups the demographic profile of the Borough is ageing with an annual requirement of 155 units of specialist older persons' housing per annum.</p> <p>An ageing population inevitably results in an increase in frail individuals and persons with long term health issues. There is a commensurate pressure on care and health services accordingly with many local authorities spending over a third of their budgets on adult social care currently.</p> <p>It is well established that poor housing can exacerbate health problems in old age, with enormous resultant costs to the NHS and social care. For example:</p> <p>Falls - Public Health England statistics show that in 2017/18 falls accounted for 335,000 hospital admissions in England of people aged 65 and over.</p> <p>Cold Homes - Millions of older people in the UK are living in homes that are too cold. A cold home can cause chronic and acute illnesses and lead to reduced mobility, falls and depression.</p> <p>Social Isolation - 1.5 million people aged 50 and over are always or often lonely, researchers have calculated. Loneliness makes it harder for people to regulate behaviours such as drinking, smoking, and over-eating, which in turn have their own significant negative outcomes.</p> <p>Specialist older persons' housing has been developed with the needs of the elderly in mind, enabling them to remain independent for longer. These homes are designed to be warm and with features to alleviate the physical impact of ageing (such as level access throughout) and offer opportunities for residents to access support, care, and companionship. The recently published Healthier and Happier Report by WPI Strategy (September 2019) calculated that the average person living in specialist housing for older people saves the NHS and social services £3,490 per year.</p> <p>Sub-Clause B 1. States that all new development is required to provide a Health Impact Assessment and paragraph 25.13 points developers towards the London Healthy Urban Development Unit (HUDU) 'rapid HIA tool'. The questions in the HIA tool are heavily weighted towards strategic residential or mixed-use developments and have little bearing on smaller sites of 20-50 units. We therefore request that sub-clause B.1. is re-visited and the requirement for Health Impact Assessments is limited to relevant developments – i.e. proposals with a clear adverse impacts on the health and wellbeing (takeaways, betting shops etc.) and strategic housing developments.</p>	<p>(see response to comment 772 in relation to housing needs)</p> <p>The Richmond Health and Care Plan (refreshed for 2022-24) sets out support for healthy ageing and reducing loneliness and isolation. Policy 12 sets out proposals for specialist older persons' housing will be considered; however policies need to be read as a whole and there is not a case to exempt other policy requirements.</p> <p>In relation to part B.1, HIA is a requirement for all major developments and it is important that we consider schemes that are likely to make a significant impact on not only incoming residents but also the surrounding community. Sites of 20-50 units are large sites. The need for HIAs are in line with the London Plan, reflecting Policies GG3 and Policy E9. The requirement for HIAs has been supported by the CCG, see comment 1096. In addition, the Council has recently updated the guidance for developers undertaking HIAs.</p>
1096	Martin Ellis, South West London Clinical Commissioning Group (CCG)	Policy 51. Health and Wellbeing	<p>We support the policy which reflects the Good Growth objective 'Creating a healthy city' (GG3) in the London Plan. We welcome the reference to the Richmond Health and Care Plan in paragraph 25.2.</p> <p>We suggest that an additional clause could be added to refer to housing design to ensure that new homes are healthy reflecting housing standards (Policy 13. Housing Mix and Standards) and design quality (Policy 28. Local character and design quality). The importance of housing design was noted in the Health Impact Assessment of the draft plan (paragraph 5.8).</p> <p>We support Clause B 1 and the requirement for a health impact assessment with all major development proposals and welcome reference to the HUDU Rapid HIA tool and the HUDU Planning Contributions Model in paragraph 25.13.</p> <p>We consider that Clause B 4 is not required as the loss of health facilities is addressed in the following Clause B 5 with reference to Policy 49.</p> <p>We note the text in paragraphs 25.17 to 25.21 which helpfully explains how the NHS is currently organised, the responsibilities of different bodies and the strategic context, including reference to the Richmond Health and Care Estates Strategy. This text will need to be revised as new models of care are developed, including primary care networks and the responsibilities for the NHS estate under Integrated Care Systems become established. As a result the text in paragraphs 25.21 and 24.12 will need to be amended to clearly explain the process and responsibilities regarding the disposal of surplus NHS assets.</p>	<p>Support noted, including for approach to HIAs.</p> <p>Add an additional clause to refer to housing design, as paragraph 25.10 refers to this only in the context of older people and paragraph 17.45 already links adequate space in the home to health.</p> <p>Noted the point about duplication in clause B.4 and B.5, however it is felt that an explicit reference to loss of existing health facilities is useful in Policy 51, to make the policy approach clear as this could apply to a range of (public and private) health uses.</p> <p>Update the supporting text to reflect the South West London Integrated Care System has come into effect.</p> <p>Paragraph 24.12 will be updated, but no change is considered necessary to paragraph 25.21 as it refers to the relevant health body.</p>
1097	Tim Harrington	Omission – public toilets	<p>My response relates to what is missing from the local plan rather than what is in it, so I cannot give detailed page numbers etc.</p> <p>Local provision of public toilet facilities. The pandemic has clearly shown that the old strategy of encouraging retailers and other owners of toilets to allow free public use to be one that cannot and does not work in a post covid world. The local plan needs to include where and how public provision of public toilet facilities is going to happen. For example, Richmond and Kew riversides both lack adequate public toilet provision. Richmond Green and Kew Green, Old Deer Park and many other locations within the borough lack public toilet facilities, a 20 minute neighbourhood needs to have public toilets within 20 minutes?</p> <p>Also with the increase in delivery drivers, it is now common place to see old bottles discarded on kerbsides filled with urine, as there is no adequate provision for delivery drivers to park and make use of a public toilet. These toilets could be provided such that a small charge via an electronic payment method could be used to fund and even make a profit from their use. Sites that could be used include the old changing rooms at Pools on the Park, next to the tennis courts, these could be dual use in that delivery drivers can park and use them and also the public and sports users can also use them. The derict toilets block on the south side of the A316 in the Old Deer Park Car park could be renovated and would be more than dual use for delivery drivers, the public and for those returning by bus from twickenham stadium on big match days. A vacant shop could be aquired within the Richmond town centre or on the riverbank to provide toilet facilities for the Green, riverside and the town centre. In Kew a vacant "under the bridge" workshop could be acquired to provide toilet facilities for the riverside, kew green and for the many</p>	<p>Paragraph 25.5 recognises the importance of public toilets.</p> <p>The Council undertook a review of permanent welfare facilities in late 2021. The majority of the 55 participants of the Community Toilet Scheme have re-opened facilities following closures and restrictions related to the Covid-19 pandemic. The report looked at a choice of selected locations across Richmond Town Centre, and set out all options are likely to incur significant capital cost to progress to implementation, and also noted the continuation of the current Community Toilet Scheme.</p> <p>Part A.4 of the policy seeks access to free public toilet facilities in major developments open to the public. The site allocations for Twickenham Riverside and the place-based strategy for Richmond & Richmond Hill also refer to aspirations for provision of public toilets.</p>

			fans that will leave the new Brentford stadium. In Sheen the old Sheen Park cricket club building on Sheen Common could be used to provide toilet facilities for those using Sheen Common. Other areas that also need toilet provision include Ham Common and the riverside near to Ham house.	
-		Policy 52. Allotments and food growing spaces		
1098	Vicky Phillips, Habitats & Heritage	Policy 52. Allotments and food growing spaces	we support the retention of all allotment sites and are pleased that they are going to be assessed as possible new SINCS. However, it should be recognised that many require considerable investment, for example in tree maintenance, maintaining paths and water supplies, introducing woody waste processing and communal composting facilities following the ban on bonfires introduced in 2019.	Noted. Whilst the points on investment etc. are not matters for the Local Plan, it should be noted that the Council's Allotment Strategy 2019-2029 sets out goals and recommendations that are intended to see the Borough's allotments continue to thrive and offer an important wellbeing and social tool for residents. These include developing an Allotment Policy in collaboration with plot holders, resurveying trees on all allotments at appropriate intervals and adopting sustainable allotment management such as communal composting and water efficiency measures. No change has been made to the policy as a result of this comment.
1099	Tim Catchpole, Mortlake with East Sheen Society	Policy 52. Allotments and food growing spaces	No comment.	N/A
1100	Jon Rowles	Policy 52. Allotments and food growing spaces	Only 9 of the 24 allotments are statutory – the ones that are not genuine temporary sites (like the ones on cemetery land) need to be made into statutory sites. 25.26: There is a need for new sites as there are long waiting lists for allotments with 16 sites having closed waiting lists as the projected wait is over five years. Many allotments have been subdivided from half plots (5 rods) to quarter plots (2.5 rods) which are not big enough for anything other than hobby growing and which are not large enough to enable crop rotation.	It should be noted that allotments can only be designated as statutory if they are in Council ownership and not on lease from other landowners; for example, some of the allotments are on Crown land, such as Bushy and Old Palace Lane. The sites which are not designated as statutory sites are in temporary use, and therefore cannot be designated as statutory allotment sites. However, it should be noted that the draft Local Plan states that the non-statutory allotments are protected from inappropriate development through designations such as Green Belt, Metropolitan Open Land and Other Open Land of Townscape Importance. In addition, policy 52 part A states that the Council will protect existing allotments whilst also supporting similar uses coming forward, therefore it is considered that this important community use is afforded adequate protection from development. There is one allotment site adjacent to a cemetery which may be reclaimed in the future for cemetery expansion, and all the plot holders there are aware of this and have been for some years. As far as the Council is aware, none of our other allotment sites are under any threat. In addition, it should be noted that the Local Plan is not the vehicle for designating allotments as statutory as this is covered under the Allotments Act. Whilst the subdivision of plots is not a matter for the Local Plan, the Council's Allotments Strategy 2019-2029 states that a national suggestion for plot size should be 10-rods (250 square metres). This equates to 0.5 hectares of allotments per 1,000 households. Using this plot size, LBRuT is below the NSALG standard, based on its current population (198,141) and household size (2,301) - the minimum amount of allotment provision would be 43.55 hectares against existing provision of 35.24 ha. However, with the current demand in London and support from a number of organisations including the GLA to split plots and create smaller, more flexible plots that appeal to a wider array of people, our strategy suggests that simply 20 allotments per 1,000 households is a more appropriate standard for an Outer London borough to be judged by. In Richmond, this suggestion equates to a standard of 20 allotment plots per 2,301 people, which the borough meets by having 28.7. No change has been made to the policy as a result of this comment.
1101	Alice Roberts, CPRE London	Policy 52 Allotments and food growing spaces	Only 9 of the 24 allotments are statutory – meaning the rest are 'temporary': we suggest these are all upgraded. Also, we would question that need is 'fluctuating' (as we understand it, the lists have been open and closed a number of times which might be leading to the appearance of fluctuations) and would recommend that a more permanent waiting list is established and advertised. Plots should not be divided when reallocated – most plots in Richmond were half plots (5 rods) but many are now just 2.5 rods which make them too small to adequately rotate crops.	It should be noted that allotments can only be designated as statutory if they are in Council ownership and not on lease from other landowners; for example, some of the allotments are on Crown land, such as Bushy and Old Palace Lane. The sites which are not designated as statutory sites are in temporary use, and therefore cannot be designated as statutory allotment sites. The matter of management of plots and potential subdivision is not a matter that the Local Plan can address. However, it should be noted that the draft Local Plan states that the non-statutory allotments are protected from inappropriate development through designations such as Green Belt, Metropolitan Open Land and Other Open Land of Townscape Importance. In addition, policy 52 part A states that the Council will protect

				<p>existing allotments whilst also supporting similar uses coming forward, therefore it is considered that this important community use is afforded adequate protection from development. There is one allotment site adjacent to a cemetery which may be reclaimed in the future for cemetery expansion, and all the plot holders there are aware of this and have been for some years. As far as the Council is aware, none of our other allotment sites are under any threat. In addition, it should be noted that the Local Plan is not the vehicle for designating allotments as statutory as this is covered under the Allotments Act.</p> <p>No change has been made to the policy as a result of this comment.</p>
-		Policy 53. Local Environmental impacts		
1102	Tim Catchpole, Mortlake with East Sheen Society	Policy 53. Local Environmental impacts	As mentioned above, this policy would sit better in the section on Local Character and Design Quality.	Policy 53 replaces Local Plan Policy LP 10, which is a standalone policy. The requirements specifically relate to environmental impacts and not local character and design quality.
1103	Michael Atkins, Port of London Authority (PLA)	Policy 53. Local Environmental impacts	Support inclusion within the policy and supporting text to the Agent of Change principle, which in line with paragraph 187 of the NPPF and Policy D12 of the London Plan, states that the Council will apply the principle, which places the responsibility for mitigating impacts from existing noise and other nuisance-generating activities or uses firmly on the proposed new noise-sensitive development.	Support for inclusion of Agent of Change principle noted.
1104	David Wilson, Thames Water	Policy 53. Local Environmental Impacts - Development within the vicinity of Sewage Pumping Stations (and Sewage Works) Works	<p>The new Local Plan should assess impact of any development within the vicinity of sewage works and sewage pumping stations in line with the Agent of Change principle set out in the NPPF and Policy D13 of the London Plan 2021.</p> <p>Where development is being proposed within 800m of a sewage treatment works or 15m of a sewage pumping station, the developer or local authority should liaise with Thames Water to consider whether an odour impact assessment is required as part of the promotion of the site and potential planning application submission. The odour impact assessment would determine whether the proposed development would result in adverse amenity impact for new occupiers, as those new occupiers would be located in closer proximity to a sewage treatment works/pumping station.</p> <p>Paragraph 174 of the NPPF, February 2021, sets out that: "Planning policies and decisions should contribute to and enhance the natural and local environment by:e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans..."</p> <p>Paragraph 185 goes on to state: "Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development..."</p> <p>The online PPG states at Paragraph: 005 Reference ID: 34-005-20140306 that: "Plan-making may need to consider:whether new development is appropriate near to sites used (or proposed) for water and wastewater infrastructure (for example, odour may be a concern)..."</p> <p>The odour impact study would establish whether new resident's amenity will be adversely affected by the sewage works and it would set the evidence to establish an appropriate amenity buffer. On this basis, text similar to the following should be incorporated into the Neighbourhood Plan: "When considering sensitive development, such as residential uses, close to the Sewage Treatment Works, a technical assessment should be undertaken by the developer or by the Council. The technical assessment should be undertaken in consultation with Thames Water. The technical assessment should confirm that either: (a) there is no adverse amenity impact on future occupiers of the proposed development or; (b) the development can be conditioned and mitigated to ensure that any potential for adverse amenity impact is avoided."</p>	<p>The wording of the policy and the supporting text has been amended to clarify that agent of change relates to nuisance-generating uses, and not exclusively those that are noise-related. This is also clear in London Plan Policy D13.</p> <p>The policy requires the submission of a relevant impact assessment 'where necessary'. Thames Water does not specify why 800m and 15m are being proposed. The existing wording is considered sufficient and would likely encapsulate the requirements. Further, where new development is within close proximity of a sewerage works/pumping station, Thames Water would be a statutory consultee as part of the planning application process for major applications. It would be expected that the applicant would liaise with Thames Water as part of their preparation of any assessment. Site Allocation for 'Twickenham Stadium' has been amended to state that the submission of an odour impact assessment would be required for any future residential scheme, given the site's proximity to a sewerage works.</p> <p>The Reg 18 consultation relates to the draft Local Plan and not a Neighbourhood Plan.</p>
1105	George Goodby, Environment Agency	Part I of Policy 53. Local Environmental impacts – Part I in relation to waste management	<p>Part I of the above policy refers to responsibility of developers to protect occupiers from existing sources of poor air quality and excessive noise. As waste sites can often be sources of poor air quality and excessive noise we welcome this position. We however would like this to be expanded upon to include more details on developer's requirements and for any waste sites specifically to be mentioned.</p> <p>The Environment Agency is having to respond to an increasing number of complaints surrounding poor air quality (usually dust) and noise at safeguarded waste sites throughout London from occupiers of new developments which have been constructed near to these existing sites. Whilst there is often a requirement for poor air quality and excessive noise to be mitigated by the operators of these sites, sometimes it is not possible to mitigate to the point of eradicating the problem. Furthermore, if the Environment Agency continues to encounter poor air quality and excessive noise at waste sites located near to new developments, then in extreme examples enforcement action might become the only course of action which can be taken. Enforcement action could subsequently affect the long-term future of safeguarded sites as waste permits might have to be suspended or revoked. Requiring developers to incorporate designs which mitigate poor air quality and dust would therefore be beneficial for both occupiers and existing waste sites and would reduce the regulatory load on the Environment Agency.</p>	<p>General support for the policy noted.</p> <p>The wording of the supporting text has been amended to clarify that agent of change relates to nuisance-generating uses, and not exclusively those that are noise-related. Part G (3) relates to air quality and requires measures to protect the occupiers of new developments from existing sources. It is therefore considered that Policy 53 is sufficiently worded to address the Environment Agency's concerns. The EA would also be a statutory consultee as part of the planning application process, where development is located near safeguarded waste sites.</p>
1106	George Goodby, Environment Agency	Policy 53: Local Environmental Impacts – Point K, Point N in relation to biodiversity	<p>Point K – Light Pollution, Part 1 should include a more precise definition of "receptors". Ecological receptors, such as bats, are particularly sensitive to light pollution so a requirement for an ecological assessment of the impact of light spill into wildlife corridors, such as rivers, should be included under this policy point.</p> <p>Point N- Construction and Demolition, Part 3 – we would welcome the inclusion of clarification that "sensitive receptors" includes rivers and the habitat they support.</p>	The supporting text on light spill has been amended to make clear that occupiers, residents and wildlife are deemed to be 'receptors'. 'Ecological habitats, including rivers' has been added as a receptor. This is considered to cover the EA's requirements.

				Policy 39. Biodiversity and Geodiversity requires the submission of an ecological assessment, where development might impact on wildlife/ecological habitats, within which light spill would be considered.
1107	George Goodby, Environment Agency	Groundwater and Contaminated Land	<p>The emerging Local Plan can help to ensure that groundwater is protected and where necessary improved during regeneration and development. Contamination in or on land can present unacceptable risks to human health and the wider environment, including to groundwater. Land contamination is often caused by previous uses such as former factories and mines, as well as new development such as petrol filling stations and cemeteries. Land contamination, or the potential for contamination, is a material planning consideration.</p> <p>Land contamination can adversely affect or restrict the beneficial use of land. Often development presents the best opportunity to successfully deal with these risks. The Local Plan therefore has a key role to play in facilitating the improvement of land affected by contamination. The Water Framework Directive and the Groundwater Daughter Directive set out objectives for groundwater including aiming for good chemical and quantitative status; no upwards trends in pollution; and preventing or limiting the entry of certain substances to waterbodies. The council must have regard to these objectives and therefore should ensure their decisions help achieve these goals. Dealing with land contamination can help contribute to achieving the objectives of the Water Framework Directive.</p> <p>Groundwater is constantly moving and once contaminated it can take a very long time to recover if at all. Therefore, the overarching approach to groundwater protection needs to be considered at the strategic planning stage. The Local Plan should identify sensitive groundwater areas along with policies for alternative approaches, such as cross boundary discussions with neighbouring LPAs, Environment Agency (where source protection zones straddle boundaries) and Water Companies.</p> <p>The outcomes we want to see:</p> <ul style="list-style-type: none"> • Groundwater is protected and improved for the benefit of people and the economy • Future developments are in appropriate locations where pollution and other adverse effects on the local environmental or amenity value are minimised. • Local plan policies and strategies help to ensure that developing land affected by contamination won't create unacceptable risks or allow existing ones to continue. • Land is managed sustainably, protecting soils and water and contributing positively to reducing the impacts of and adapting to climate change. <p>The London Borough of Richmond overlies the London Clay bedrock formation (classified as unproductive strata), with superficial deposits comprising of the Kempton Park Gravel, Taplow Gravel, Black Park Gravel, Alluvium, Head and Langley Silt Member. Any pathways for contamination must be strictly controlled to avoid pollution of the Principal and Secondary aquifers from any historic contamination identified on the site from previous uses. We can confirm that, from reviewing the list of 37 proposed redevelopment sites identified within the Local Plan, none of which lie within any Source Protection Zones.</p>	<p>The supporting text on land contamination has been amended to reference Policy 8. Flood Risk and Sustainable Drainage and the need to minimise risk of groundwater flooding (which can increase risk of land contamination). Additional text has been added to outline that water quality must also be protected from land contamination risks.</p> <p>Policy 8 is the primary policy in the Local Plan relating to development which may be at risk from, or contribute to, groundwater flooding. This also sets out the development must adhere to the requirements with regards to groundwater flooding set out in the Council's Strategic Flood Risk Assessment (SFRA) 2021. Policy 9 also addresses how development proposals can impact on water quality. The Local Plan is therefore considered to sufficiently address the EA's requirements. Further, all applications at risk of a source of flooding, are required as per the Council's Local Validations Checklist, to submit a Flood Risk Assessment (FRA).</p> <p>The EA's confirmation that the Reg 18 Site Allocations are not within Source Protection Zones (SPZ) is noted. Three additional Site Allocations are being added to the Plan. The EA will have opportunity to comment on the additional Site Allocations at Reg 19 stage. However, it is not considered that they would likely be located within a SPZ.</p>
1108	George Goodby, Environment Agency	Groundwater Protection	<p>Proposals for Sustainable Drainage systems involving infiltration must be assessed and discussed with the Environment Agency to determine their suitability in terms of the impact of any drainage into the groundwater aquifer.</p> <p>Any developments with proposals for piled foundations must take account of disturbance of any ground to cause turbidity in water supply and to prevent creating pathways for contamination materials to reach the groundwater beneath any sites impacted by contamination or landfill.</p>	<p>All applications at risk of a source of flooding are required to be accompanied by the submission of a SuDS Statement. Any further requirements from the EA could be captured via an informative advising the applicant to liaise directly with the EA.</p> <p>Relevant applications which may be impacted by, or impact on, groundwater and/or land contamination, require the submission of a groundwater report. The requirements set out in the land contamination supporting text are considered to be sufficiently clear, especially as it states that a competent person is required to prepare any necessary investigations/reports.</p>
1109	George Goodby, Environment Agency	Contamination	<p>Development proposals (such as those reviewed in Sections 5-14) that would enable contaminated sites to be brought into beneficial use will normally be permitted, so long as the sites can be rendered suitable for the proposed end use in terms of the impact on human health, public safety and the environment, including underlying groundwater resources. Key sites listed within the Local Plan include Sites 5 and 29 (the two Sainsbury's car park with associated petrol filling stations) in Hampton and Richmond; Site 13 which is located in close proximity to a historic landfill to the east/north east; and Site 31 the Biothane Plant in Kew.</p> <p>Such identified developments on land known or suspected to be contaminated or likely to be adversely affected by such contamination will only be permitted where:</p> <ol style="list-style-type: none"> 1) An appropriate site investigation and assessment (agreed by the Council) has been carried out as part of the application to establish whether contamination is present and to identify any remedial measures necessary to ensure that the site is suitable for the proposed end use; 2) The proposed remedial measures would be acceptable in planning terms and would provide effective safeguards against contamination hazards during the development and subsequent occupation of the site. <p>Planning conditions will be attached to any consent to ensure that remedial measures are fully implemented, before occupation. We recommend that the applicant:</p> <ul style="list-style-type: none"> • Refers to the Environment Agency Land Contamination Risk Management guidance (LCRM); • Uses BS 10175:2011+A2:2017, Investigation of potentially contaminated sites – Code of Practice as a guide to undertaking the desk study and site investigation scheme; • Uses MCERTS accredited methods for testing contaminated soils at the site; and <p>Consult our website at www.environment-agency.gov.uk for further information about any permissions that may be required. We welcome the inclusion of Part M of Policy 53. Local Environmental impacts addressing the requirement for development to remediate any potential contamination and to properly consider the risk associated. However, we would welcome stronger and</p>	<p>The EA's recommendations for applicants is noted. The Council would expect information to be prepared by an aptly qualified person, in order to be considered satisfactory, who would be expected to have regard to the mentioned LCRM, BS Code of Practice and accredited methods, as relevant.</p> <p>Support of Part M is noted. The NPPF is already a material planning consideration in the assessment of any application, and thus due regard to Paras. 183 & 184 would already be had as part of the planning application process. The Council's land contamination officer would be consulted on any submitted report as part of the planning application process.</p> <p>The wording of Part M is already clear that the Council promotes, where necessary, the remediation of contaminated land where development comes forward, and that potential contamination risks will need to be properly considered and adequately mitigated before development proceeds. The policy is therefore considered to sufficiently encapsulate the EA's requirements.</p>


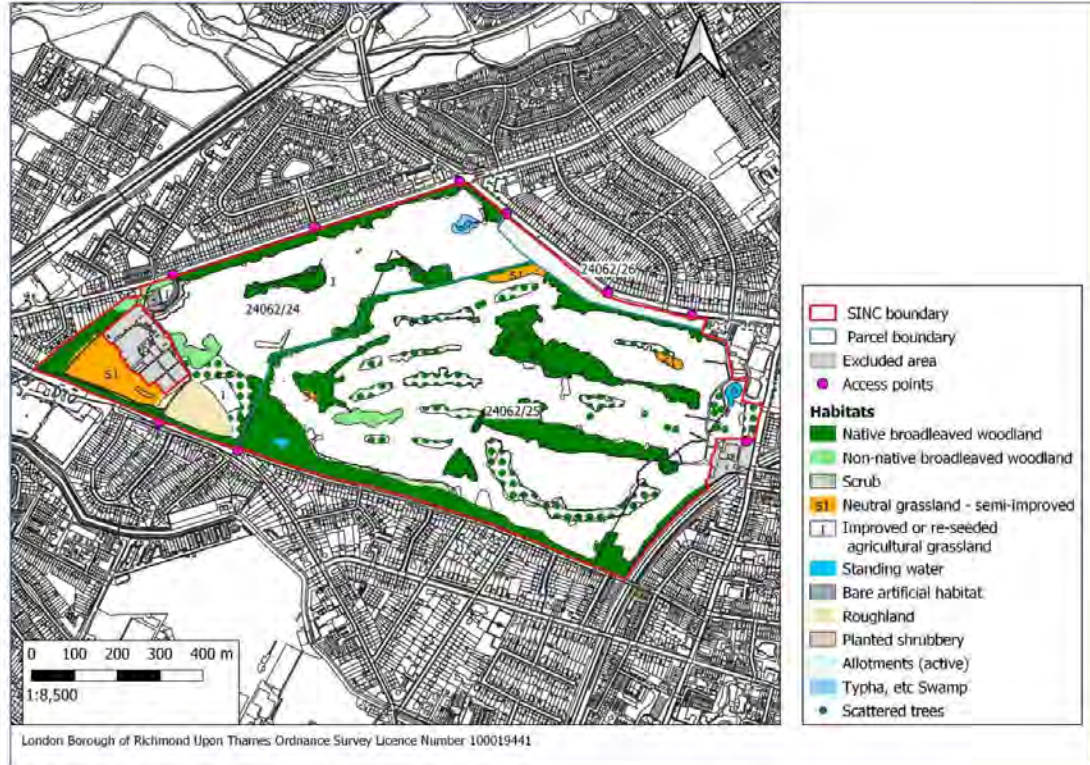
			<p>more clearer wording within this policy unit to clarify what is required both in terms of assessment and suitability when it comes to any proposed development. We would recommend that reference is made to NPPF paragraph 183 and 184 which further outlines the requirements to deliver development identifying and addressing any potential risks. The Environment Agency will object to development on brownfield land where the principles of NPPF are not being applied at the planning application stage. The risks to the environment should be fully assessed during any site investigations.</p> <p>The Local Plan should ensure the evidence base takes a risk-based approach to defining contaminated land by identifying the source-pathway-receptor (contaminant linkages). This should inform the council where Preliminary Risk Assessment (PRA) is required.</p> <p>We would welcome policies which require developers to submit a PRA together with a planning application where land is potentially contaminated. Policies should require developers to submit a PRA together with a planning application where land is potentially contaminated.</p> <p>For potentially contaminated land;</p> <ul style="list-style-type: none"> • Policies should require developers to ensure sites are suitable or made suitable for the intended use • Policies should require developers to prevent discharges to ground through land affected by contamination • Policies should encourage the implementation of measures that prevent contamination being activated or spread when development takes place for any land which is affected by contamination. • Policies should link to and promote relevant guidance such as the risk management framework provided in the CLR11, Model Procedures for the Management of Land Contamination: https://www.gov.uk/government/publications/managing-land-contamination • Provide and encourage the council to use our evidence, information and advice (maps and descriptions showing geology, hydrogeology and the location of source protection zones (SPZ)). <p>We will provide the council with advice and support:</p> <ul style="list-style-type: none"> • Where strategic sites are proposed in Source Protection Zones 1 or near to sites regulated by the EA, including areas where we are likely to object to certain activities that could damage or diminish groundwater resources. 	
1110	Suzanne Parkes, Elmbridge Borough Council	Policy 53. Local Environmental impacts - Natural environment	<p>We support Policy 53 'Local Environment Impacts' and how the council will seek to minimise impact on the environment. The policy aims to protect and enhance the natural environment through a range of ways set out in the document. We do recommend that there should be greater emphasis and connection with Policy 53 and Policy 3 'Tackling the climate emergency' (strategic policy). It is expected that increased development will impact Air Quality in the Hampton Court area and principally affecting the aims of tackling climate change.</p> <p>Again, we look forward to our continued discussions as our respective Local Plans progress.</p>	<p>General support for the policy noted.</p> <p>A short introductory paragraph to the supporting text to has been added which mentions the link between tackling the climate emergency and the consideration of local environmental impacts.</p>
-		Policy 54. Basements and subterranean developments		
1111	Tim Catchpole, Mortlake with East Sheen Society	Policy 54. Basements and subterranean developments	<p>Item B.5 needs to be modified to: "demonstrate that the scheme will not <i>puncture or degrade a sealed or isolated aquifer</i> or increase or otherwise exacerbate flood risk."</p> <p>As mentioned above, this policy would likewise sit better in the section on Local Character and Design Quality.</p>	<p>Matters of flood risk are already addressed in Policy 8 Flood Risk and Sustainable Drainage, and the Plan needs to be read as a whole. Policy 8 already requires a Screening Assessment to be carried out in throughflow and groundwater policy zones. A Screening Assessment requires an applicant to address where a site is underlain by an aquifer and/or permeable geology. If the answer to this question is a 'yes', then the applicant will be required to undertake a Basement Impact Assessment, where further investigations and potential mitigation measures will be required.</p> <p>It is considered that this policy sits well amongst the policies that focus on creating safe communities, particularly alongside Policy 53. Local Environmental impacts. See also response to comment 201.</p> <p>No changes proposed as a result of this representation.</p>
1112	David Wilson, Thames Water	Policy 54 - Basements – Sewage flooding	<p>Thames Water's main concerns with regard to subterranean development are:</p> <ol style="list-style-type: none"> 1) The scale of urbanisation throughout London is impacting on the ability of rainwater to soak into the ground resulting in more rainfall in Thames Water's sewerage network when it rains heavily. New development needs to be controlled to prevent an increase in surface water discharges into the sewerage network. 2) By virtue of their low lying nature basements are vulnerable to many types of flooding and in particular sewer flooding. This can be from surcharging of larger trunk sewers but can also result from operational issues with smaller sewers such as blockages. Basements are generally below the level of the sewerage network and therefore the gravity system normally used to discharge waste above ground does not work. During periods of prolonged high rainfall or short duration very intense storms, the main sewers are unable to cope with the storm flows. <p>The policy should therefore require all new basements to be protected from sewer flooding through the installation of a suitable (positively) pumped device. Clearly this criterion of the policy will only apply when there is a waste outlet from the basement i.e. a basement that includes toilets, bathrooms, utility rooms etc. Applicants should show the location of the device on the drawings submitted with the planning application.</p>	<p>The Local Plan needs to be read as a whole, in particular as Policy 8 Flood Risk and Sustainable Drainage already requests this information at paragraph 16.82. Notwithstanding, it is acknowledged that the specific requirement for a pumped device could also be contained within the main policy; therefore, a new criterion (6) is added to Policy 54 as follows: "where the proposal contains a waste outlet, install a suitable (positively) pumped device to protect the development from sewer flooding, in line with Policy 8 Flood Risk and Sustainable Drainage;"</p> <p>In addition, the first sentence of paragraph 25.55 will be amended as follows to ensure applicants are aware of the requirements in Policy 8: "All basement and subterranean development should be installed with a pumped sewerage system to prevent flooding from back flow in public sewerage system as recognised in Part H of the Building Regulations, with further details set out in Policy 8 Flood Risk and Sustainable Drainage."</p>
-		Delivery and Monitoring		
-		Policy 55. Delivery and Monitoring		

1113	Theresa Oddelm, The Royal Parks	Policy 55 Delivery and Monitoring	In terms of size and value, The Royal Parks are key features of the Borough which provide open space for residents, workers and visitors. It is therefore important that some of the value of development in the Borough helps to support the maintenance, management and protection of Parks which will come under increasing pressure over the Plan period. We would like to work with the Council to achieve this.	Noted. The supporting text sets out the details around the approach to planning obligations and the borough Community Infrastructure Levy, which combined contribute to meeting the infrastructure needs of the borough. An Infrastructure Funding Statement is published each year setting out the income and expenditure relating to the community infrastructure levy (CIL) and section 106 (S106) agreements. See also responses to comments 199 and 791.
1114	Tim Catchpole, Mortlake with East Sheen Society	Policy 55. Delivery and Monitoring	No comment.	Noted.
1115	Martin Ellis, South West London Clinical Commissioning Group (CCG)	Policy 55. Delivery and Monitoring	We welcome the policy, but the clauses under the 'Infrastructure' heading do not refer to social infrastructure and as such the policy does not reflect the requirements in Policy 49. Clause D states that the Council will require planning obligations to mitigate any adverse impact from a development. However, neither the policy or supporting text refers to the Planning Obligations SPD (June 2020) and the requirements for each type of infrastructure. Paragraphs 24.3 and 26.1 mention that the Council intends to update the Infrastructure Delivery Plan in 2022 and the CCG would welcome the opportunity to contribute to the update so that it reflects the Richmond Health and Care Plan and Richmond Health and Care Estates Strategy.	Comments noted. It is not considered necessary to cross-reference to all the policies in the Plan which may require a planning obligation, as these are made clear in relevant policies and will vary significantly depending on the type of development. Add reference to the Planning Obligations SPD in the supporting text. Information from the health bodies has informed the update of the Infrastructure Delivery Plan in 2023.
-		Appendices		
1116	Stephen Brooker, Walsingham Planning, on behalf of Whitbread Plc	OMMISSION - Glossary	It is noted that there is no glossary to the Plan except in respect of energy, carbon etc on page 144. In the absence of a Glossay it should be noted that the definitions/glossary set out in NPPF will be applicable.	Add a glossary to the Plan.
1117	Graeme Fraser-Watson, The Teddington Society (Planning Group)	Glossary	The draft local plan is full of acronyms and phrases that are not generally understood. It would be very useful to have a glossary provided in any future publication. We hope that you are able to take these views into account in the final new Local Plan.	Add a glossary to the Plan.
-		Appendix 1: List of Key and Secondary Shopping Frontage - no comments received		
-		Appendix 2 Marketing Requirements - no comments received		
-		Appendix 3:Tall and Mid-Rise Building Zones		
1118	Nick Alston, Avison Young on behalf of St George Plc and Marks & Spencer	Appendix 3 (Tall and Mid-rise Building Zones)	The content of Appendix 3 (including specifically 27.25-26 – Kew Retail Park) should be updated to account for our comments set out in Section 2, including with respect to the extent of the tall and mid-rise building zones and the stated appropriate heights. [See comment 1037 in respect of the Urban Design Study]	See response to comment 1037.
1119	Peter Eaton	Policy 45 Tall and Mid-Rise Building Zones & Appendix 3 - 27.27	The last to bullet points relate to Policy 45- Tall and Mid-Rise Building Zones and the Urban Design Study 2021 - (UDS) Here the first of these two last bullet points correctly refers to a maximum building height of 7 storeys - defined in 27.27 as (21m). However, in the UDS there are three locations where there is inconsistency which requires correction. - Firstly on Pg 317 the appropriate building height range shows 7 to 8 storeys - 21-24m for the Stag site. This should be 7 storeys and clearly defined as a maximum height . - Secondly in A.5.1 on Pg 340 - there is reference to 7-8 storeys (21-24m) as an appropriate height. This should be corrected for consistency - as maximum 7 storeys (21m). - (General correction -On the same page Fig 446 refers to - A view along Ship Lane, to the locally listed Tapestry pub. The view is of the Jolly Gardeners pub). - The definition of Tall Building Zones and Mid-Rise Building Zones are illustrated for the Stag site on Fig.445 on pg 340. This is shown in more detail in Regulation 18 under diagrams/text 27.27 and 27.28 in Appendix 3. Here the zones illustrated as a series of 'contours' shaded in darker and lighter salmon colour tones: the darker being the highest- 7 storeys, and the lighter the range from 5-6 storeys - (15-18m). The higher zone is shown running through the central core of the site which generally accords with wording in the Planning Brief for the site - SPD 2011. However, the definition of where 5-6 storeys might be acceptable is far too broad reaching and does NOT accord with the wording of the SPD and in particular Clause 5.31 which requires buildings to diminish in height and scale towards the perimeter of the site or along the Riverside. A reduction from a maximum of 7 storeys to 5/6 is not sufficient in the locations shown by the contours. Given that the maximum height should be 7 storeys then the colour contours for buildings of 5-6 storeys ought to be defined further back from the site perimeter and riverside. The proposed contour plan should be amended to pull back the 5-6 storey zone from the perimeter and particularly the riverside. At present it could be interpreted that buildings up to 6 storeys would be acceptable at the perimeter and along the riverside but this would be excessive and harmful to the Arcadian Thames context, the towpath, and general 2/3 storey character of the surrounding area. It also represents too tight a range between tall and mid-rise on this particular site. - Given the scale of the Stag site - 22 acres - it would be appropriate for diagrams 27.27 and 27.28 to be enlarged for clearer definition of the zones given the above comments.	The Urban Design Study has been amended as follows: - Amended caption to Fig 446 to read Jolly Gardeners pub - p.317, p.340 amended to read 7 storeys -Added text within Mid-rise zone to read <i>"Buildings within the mid-rise zone should step down sensitively to the riverside and ensure they respect the character of the Arcadian River Thames and surrounding area of 2-3 storey buildings."</i> The mid-rise zone for the Stag Brewery site is set back from the river and perimeter roads, allowing appropriate stepping down to surrounding low-rise buildings and Mortlake and Mortlake Green Conservation Areas. This is shown on the detailed plan on p.340 of the UDS. The lighter coloured contours towards the edges of the zone represent stepping down in height. It is considered that the zone allows sufficient offset. It should be noted that the zone is not suggesting 5 and 6 storey buildings over the entirety of the zone, but that building heights should vary appropriately and step down, as described in the accompanying text, and would be developed as part of a site specific masterplan. No further amendments are required. It is considered that the diagrams sufficiently show the heat mapping on this site. No amendments are required.
-	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	High rise development	[See comment 1033 in respect of high rise development and comment 1032 in respect of Policy 45]	See response to comment 1032 with regards to Richmond Station. No amendments are required.
-	Peter Willan and Paul Velluet, Old Deer Park Working Group	High rise development	[See comment 1035 in respect of Policy 45 and high rise development which refer to Richmond Station]	Please see responses to comments 1030 and 1032 regarding the Urban Design Study methodology, Richmond Station, North Sheen and tall buildings' impact on townscape. No amendments to the text are necessary.

1120	Louise Fluker, The Richmond Society	Policy 45 Tall Buildings page 273-4 and Appendix 3 - 27.21 Richmond Station: Tall Building Zone Appropriate height: 7-8 storeys (21-24m) and 27.22 Richmond Station: Mid Rise Zone Appropriate height: 5-6 storeys (15-18m)	as stated above [See comment 584 against the place-based strategies] we do not consider the area around Richmond Station as appropriate for Tall buildings (in excess of 7 storeys or 21 metres. Even mid rise buildings will be taller than current buildings	Please see responses to comments 1030 and 1032 regarding the Urban Design Study methodology, Richmond Station, North Sheen and tall buildings' impact on townscape. No amendments to the text are necessary.
1121	James Sheppard, CBRE, on behalf of LGC Ltd	Urban Design Study - LGC site	<p>6. Urban Design and successful placemaking</p> <p>The critical business and commercial imperative to develop a new modern, fit-for-purpose home for LGC in Teddington has led to LGC, in tandem with a plan-led approach, to explore pre-application meetings with the Council, presenting illustrative layout and design proposals for discussion purposes. These initial designs demonstrate that a net-gain in employment floorspace can be delivered on the LGC site, whilst simultaneously providing homes and a policy compliant level of much needed affordable homes. Crucially, these aspirations can be delivered in a sensitive form that fully considers the surrounding urban design context. The site is wholly inefficient and there is an opportunity for the Council to support the site's comprehensive redevelopment, meeting a range of policy aspirations, in a considered form. Through technical assessment, including townscape, a range of low-mid height buildings of high-quality can be delivered.</p> <p>The place-based strategy for Teddington and Hampton Wick, as presented in the Urban Design Study (2021), confirms the area as being home to significant assets in the science and life sciences sectors, including LGC, with the proximity of Teddington town centre and railway station providing good transport links into central London.</p> <p>The Urban Design Study designated the site within Character Area B2 – Teddington Residential (sub-area B2a).</p> <p>The character area appraisal within the study broadly comments that the Teddington Residential area has a high sensitivity to change. Notably however, the appraisal confirms negative qualities that do not contribute to the character of the area. Primarily, it has been assessed that the large, gated complex of the National Physical Laboratory (including LGC) has a negative impact on the adjacent Coleshill and Blandford Roads, with metal fencing and blank facades. It was also commented that there a lack of incidental green space in the locality. The urban design quality of the site and surrounds of LGC can therefore be demonstrably improved through considered redevelopment. Through initial illustrative designs there is an opportunity to provide those incidental, publicly accessible green spaces, whilst opening the site up, becoming outward facing, connected with its surroundings and enhancing permeability through the site.</p> <p>The B2 character area appraisal concludes by noting "the coarser urban grain and existing taller buildings in the area around the National Physical Laboratory (sub-area B2a) provides potential opportunity to accommodate development or intensification whilst addressing and improving some of the negative qualities".</p> <p>It follows therefore that although most of the borough is characterised by areas that have a high degree of sensitivity to change, the LGC site is one of the few areas that can accept change. It is strongly considered that any change through redevelopment in this sub-area, could be progressed in a form that is highly beneficial to the urban design context.</p> <p>It is in this vein that we strongly consider that the site is appropriate for designation as suitable for 'mid-rise' buildings. It is acknowledged that the site's location and proximity to sensitive landscapes, such as Bushy Park to the South, would preclude the site from being suitable for tall buildings. However, given the site's only 'moderate sensitivity' to change, we would strongly advocate that sub-area B2a should be assessed in more detail as part of the Local Plan's evidence base, with a view to including it as a 'mid-rise building zone'. Mid-rise buildings are defined in the draft Local Plan under draft Policy 45, as being "buildings which do not trigger the definition of a tall building but are 5 storeys or over (up to 6 storeys), or 15 metres or more from the ground level to the top of the building (whichever is lower)".</p> <p>Any future proposed redevelopment of the site for mixed-use, as demonstrated through an evolving illustrative masterplan for the site, as presented to Council officers, could fulfil the criteria as set out in draft Policy 45c. Mid-rise buildings could be carefully located and designed to step down to surrounding existing and proposed buildings, namely Coleshill Road and Queens Road; would respond positively and protect the setting of existing buildings including heritage assets; respect the scale, width and proportion of adjacent streets and valued features; and deliver a varied and interesting roofline.</p> <p>It is noted that draft Policy 45d, makes an allowance for mid-rise buildings outside of the identified mid-rise building zones where they are within or adjacent to areas which include buildings taller than the prevailing height. However, given the site's assessed moderate sensitivity to change, we advocate for its inclusion as a mid-rise building zone. Indeed, draft paragraph 22.26 concedes that further suitable sites for mid-rise buildings may become available, particularly those sites which allow for a comprehensive scheme with mid-rise at its centre while still integrating well with the locality, with lower height at the periphery to avoid imposing negatively on the surroundings.</p> <p>In addition to the above, the conclusions reached in section 4.2 of the Urban Design Study, state that the LGC site has been assessed as having a relatively 'low probability of change'. Through continued dialogue with the Council, it has been documented that the LGC site is no longer fit for purpose, is wholly inefficient and ineffective, and must change in the shorter term to ensure business and scientific needs are met into the future. As such, we would recommend the probability of change is increased to 'high (shaded green)'.</p> <p>We respectfully request that the Council specifically assess and consider in more detail the LGC site's potential to be designated as a 'mid-rise building zone' given its suitability and moderate sensitivity to change.</p>	<p>The site has been assessed as having a low probability of change, largely due to its designation as a Key Business Area and Locally Important Industrial Land & Business Park designation (part of the West Twickenham cluster). It is also assessed as having a medium sensitivity to change and a medium capacity for change. There is no strong evidence in the Urban Design Study to indicate that a mid-rise zone should be defined in this area. Nevertheless, as the policy for mid-rise zones acknowledges, there may be opportunities for buildings of 5-6 storeys outside of mid-rise zones at a site specific scale, and particularly as individual buildings which form part of a wider predominantly low-rise masterplan depending on surrounding context. Policy 45 recognises that proposals for mid-rise buildings may be considered suitable outside tall and mid-rise building zones. In light of the above, it would not be appropriate to include the site as a mid-rise zone and there is no requirement to amend the text accordingly.</p> <p>Text added to sensitivity section of character profile in the Urban Design Study: <i>"However, views from within Bushy Park towards sub-area a are particularly sensitive and should be carefully assessed in the context of any development proposals within this area."</i></p>
-	Catherine Rostron	Place-based strategy for Kew – Kew Retail Park, Kew Biothane	[See comments 624 and 629 in relation to height on site allocations in Kew]	See responses to comments 624 and 629.
-	Graeme Fraser-Watson, The Teddington Society (Planning Group)	Place-based Strategy for Teddington & Hampton Wick	[See comment 300 in relation to mid-rise buildings in Teddington]	See response to comment 300.

-	Christine Duke	Site Allocation 12: The Stoop (Harlequins Rugby Football Club), Twickenham	[See comment 520 in relation to the mid-rise building zone at Site Allocation 12]	See response to comment 520.
-	Vincent Gabbe, Knight Frank, on behalf of Harlequin Football Club Limited	Site Allocation 12: The Stoop (Harlequins Rugby Football Club)	[See comment 517 in relation to the mid-rise building zone at Site Allocation 12]	See response to comment 517.
-	Marie Lewis	Urban Design Study - Homebase, Manor Road, East Sheen	[See comment 605 in relation to the tall and mid-rise building zones on the Homebase site against Site Allocation 28]	See response to comment 605.
-		Appendix 4: Review of Sites of Importance for Nature Conservation		
1122	Unity Harvey	Appendix 4: Review of Sites of Importance for Nature Conservation, Page 336: Barn Elms	<p>a. would like to add the area of <i>Shadwell Pool from Queen Elizabeth Walk to Beverley Brook as a vital and essential area for nature conservation</i>. It has much protected wildlife like bats in its own right but is also the only over-land wet area to and from the London Wetland Centre from Surrey via Richmond Park Roehampton Golf Club and Barnes Common. The LWC is built up on its other 3 sides...</p> <p>b. The <i>strip of grass between the Wandsworth Tennis courts and the Richmond Playing Field copse belonging to Wandsworth</i> also used to have special status to protect the wooded copse but this status was removed some years ago. Please could it be protected again to prevent car and boat parking; waste bins and rubbish being placed on it.</p> <p>c. Please could you ensure that 1. the <i>no floodlighting on Barn Elms</i> regulation remains and 2. also <i>address the issue of increasing numbers of mobile lights</i>. They are already on Rocks Lane Sports Centre narrowing the wildlife run, Enable Wandsworth Sports Centre between the copse and Beverley Brook, Richmond Playing Field Tennis Courts and the London Wetland Centre. I feel that it is only a matter of time before the Enable want mobile lights on their tennis courts too. This patchwork of lights effectively blocks the north/ south wildlife corridor. Insect life is at its peak for the first hour after sunset just when the lights are switched on so they seriously affect the food supply for nocturnal creatures.</p>	<p>The entire Barn Elms Recreation Ground benefits from existing protections and management which are linked to policies within the adopted Local Plan (and can be viewed using the Council's online mapping tool). The site is designated as Metropolitan Open Land and Public Open Space, whilst it is also located within the Thames Policy Area.</p> <p>The draft Local Plan includes a policy on floodlighting and other external lighting (Policy 43. Floodlighting and other external artificial lighting) which states that impacts on biodiversity and local wildlife will be assessed when applications for floodlighting are submitted.</p>
1123	Hilary Pereira, River Thames Society	Appendix 4 - Maps, on pages 336 and 339	Responsibilities over river-related matters are not immediately obvious, and it is unhelpful for official documents to be inconsistent. The maps on pages 336 and 339 of this consultation plan draw the Borough boundary to exclude the water space, which is incorrect. Whilst some of the Council's powers do not apply in/over the river, it is still the responsible borough when its territory includes the bank either all the way across or to the agreed boundary line with another Local Authority. These charts need to be corrected [within appendix 4 on pages 336 and 339].	The maps on p.336 and p.339 do show an inconsistency in the mapping. The mapping for the Council's Regulation 19 Local Plan consultation has been updated and the clarity improved.
1124	Dilys Walker	Paragraph 21.62, Policy 39 Biodiversity and Geodiversity, Places: Teddington and Hampton Wick, map of Richmond SINC in Section 27 Appendices: Appendix 4 , site 50 ref: RiB 32 Udney Park	<p>RiB 32 New SINC proposal for Udney Park Fields is fully supported by my family who live on the boundary of a Udney Park Fields. The fields are an important corridor of green space for wildlife as well as an important space for sports play. Biodiversity studies show it has varied wildlife - in particular bat species. It has been partially rewilded since the reduction in number of sports pitches. Wild plants and animals are returning to the green space. It is a calm and much needed green space and Site of a nature conservation for the local community to enjoy. It is also an important surface drainage area and carbon capture as it rewilds.</p> <p>I fully support the review of site ref RiB32 for inclusion in the plan as a Site of Important Nature Conservation (SINC). The fields are an important corridor of green space for wildlife as well as an important space for sports play. Biodiversity studies show it has varied wildlife in particular - several species of bats and other animals and insects. Since the reduction in sports pitches the field has partially rewilded and many wild plants and animals are returning. It is a calm, much needed and much loved local space for surrounding dwellings and the wider community. It is also important for surface drainage and as an area of carbon capture as it rewilds.</p>	The support in these comments is noted.
1125	K Peachey	Para 27 Appendix 4	<p>27 Appendix 4</p> <p>I fully support Udney Park being designated as a SINC so that biodiversity can be maintained and enhanced. This site hosts multiple and protected species and acts as a connecting habitat for flocks of birds and more local wildlife. Sadly, it's earlier status of OOLTI did not prevent some destruction of mature habitat, including tree felling and hedgerow removal.</p>	The support in these comments is noted.
1126	Mark Jopling, Udney Park Playing Fields Trust	Udney Park Playing Fields	The Local Plan Pre-Publication Version also includes for the first time Udney Park as a Site of Borough-wide Importance for Nature Conservation, a designation we fully support and which is consistent with public access and use of Udney Park as a community playing field. Udney Park is a critical habitat as part of the local ecology network of SSSIs and home to at least 9 protected species as identified by ecology experts.	The support in these comments is noted.
1127	Katarina Hagstrom	The Review of Sites of Importance for Nature Conservation and Addendum - Site name: Udney Park, Site ref: RiB32	<p>I support the designation of Udney Park as a Borough Grade SINC. The evidence base supporting this designation is overwhelming. It includes:</p> <p>(1) Bat surveys onsite in 2016-2017 recorded "<u>at least 8 different species of bats</u>" (emphasis added). The survey report <u>names 9 species</u>: "<i>Species of bats recorded during the surveys included common pipistrelle, soprano pipistrelle, nathusius pipistrelle, noctule, leisler, serotine, brown long-ear and myotis species (possibly brandts and daubentons).</i>" Ref: Peach Ecology, Phase 2 Bat and Reptile survey report, 11 July 2017.*</p> <p>(2) Bat surveys onsite in 2019 "<u>recorded similar species of bats, at least 8 different species</u>" (emphasis added) with the survey report <u>naming the same 9 species</u>, noting "<i>the exact myotis species was not confirmed although it is considered likely that the recordings were Brandt's and/or Daubenton's</i>". Ref: Peach Ecology, Update Bat Activity Survey Report 2019, 3 October 2019.*</p> <p>(3) The Richmond Bat Species Action Plan steering group has noted: "<i>The site has high species richness, with eight bat species recorded during the surveys carried out by Peach Ecology & Environmental Services in 2017. This included records of species of conservation concern in London:</i> - brown long-eared bat - the borough of Richmond is one of the few places in London with a concentration of records (London Bat Group 2015); this species is very light-shy and the protection of dark wildlife corridors is key to its survival</p>	The support in these comments is noted.

			<p>- serotine - also has a sporadic distribution across London (London Bat Group 2015) and it appears to be declining in the borough of Richmond - over 20 years of bat monitoring at the London Wetland Centre a steep declining trend has been recorded to the extent that it has virtually disappeared from the site (Mayfield et al, 2017)</p> <p>- noctule - this species has shown a very steep decline over 20 years of bat monitoring at the London Wetland Centre (Mayfield et al, 2017) and a similar trend was shown at the Greater London scale from 1997 to 2006 (Briggs et al, 2007)</p> <p>- two species have been recorded (Leisler's bat and Nathusius' pipistrelle) whose population size in the UK is uncertain (Mathews et al 2018). The borough of Richmond appears to be an important locality for both species, at least within a London context (London Bat Group 2015).</p> <p>The site is <u>part of a network of green spaces connecting two important bat habitats</u>, Bushy Park and the river Thames. It is <u>vitaly important to maintain these wildlife corridors</u> which are constantly under threat and gradually disappearing.” (emphasis added).</p> <p>Ref: Richmond Bat Species Action Plan steering group submission to Consultation on designation of Udney Park Playing Fields as Local Green Space, 4 April 2019.*</p> <p>(4) For the Planning Inquiry in 2019, Peach Ecology assessed Udney Park as meeting some criteria for a Site <u>Metropolitan Importance</u> for Nature Conservation (SMINC) designation: <i>“The site currently <u>meets some of the SMINC criteria</u> (most notably <u>species richness and important populations of species</u>).”</i> (emphasis added).</p> <p>Ref: Peach Ecology, Ecology Proof of Evidence, 7/10/2019.*</p> <p>(5) For the Planning Inquiry 2019, Dr. Sarah Cox (CEcol, CEnv) evaluated the Udney Park Bat data <i>“in line with best practice (Wray et al. 2010 (Appendix A) and CIEEM, 2019).”</i>: <i>“This method aims to provide a structured, transparent and repeatable framework within which the importance of bat assemblages and roosts can be assessed in line with established guidelines for Ecological Impact Assessment (CIEEM, 2019). In the case of foraging/commuting the aim is to distinguish between different intensities of use or behaviour. Of particular relevance is that this assessment must be considered within the context of the wider landscape (i.e. desk study data provided by GiGL). I agree with The Council’s case that an assemblage of at least eight species... ..presents an important local assemblage. The context for this being that the Barnes Wetland Centre SSSI and Local Wildlife Site (Site of Metropolitan Importance) support seven species. <u>Given that Udney Park provides functional connectivity with the wider landscape and supports at least eight species, current Ecological Impact Assessment (EcIA) guidelines for (CIEEM, 2019) are clear in that a precautionary approach to evaluation must be applied. The site would, consequently, be evaluated at least at the borough scale.</u>”</i> (emphasis added).</p> <p>Ref: Dr. S. Cox, Proof of Evidence on Ecology Matters, 8/10/2019.*</p> <p>(6) Natural England has noted the significance of Udney Park: <i>“We are keen to underline that areas such as Udney Park are significant in a number of ways in relation to Natural England’s remit. The area holds a range of ecological interests of particular note the bat species (8 in total) that use the area for commuting, foraging and roosting. Taken more strategically green open space such as this plays a <u>significant role in the provision of a mosaic of linked and related greenspace</u> across the area that serve a range of important functions both for wildlife and people. (Bushy Park, the river corridor, Richmond Park and a range of additional <u>greenspaces including Udney Park act as important ‘stepping stone’ sites for wildlife</u>). Access to nature for local communities, climate change adaptation benefits, intrinsic biodiversity value are all important elements at this site...”</i></p> <p>Ref: Natural England, Response to Richmond Local Plan Proposed Main Modifications, 5 April 2019.*</p> <p>(7) The Ecological appraisal from 2016 notes: <i>“the hedgerows are more than 20 m long, contain 80% native species and are therefore considered as UK BAP habitat”</i>.</p> <p>Ref: Ecological Appraisal, Lindsey Carrington Ecological Services, March 2016.*</p> <p>(8) In addition to the species noted in the Local Plan Addendum 16/12/21, item 1, table 59, further Protected and Priority species recorded at Udney Park include: Redwing, Starling, Mistle Thrush; Dunnock, Grey Heron, Stock Dove, Goldcrest, Tawny owl; common toad; Jersey Tiger moth, White Ermine moth, Shoulder-striped Wainscot moth, Cinnabar moth.</p> <p>Ref: records provided for Local Plan Review 2021</p> <p>Note: *Reference documents from LBRUT 18/0151/FUL Planning Application/ Planning Inquiry or Local Plan LGS assessment for Udney Park.</p>	
1128	Vicky Phillips, Habitats & Heritage	New Sites of Importance for Nature Conservation	we support the new designations and changes suggested in Appendix 4, including the recognition of Udney Park Playing Fields in Teddington as a Site of Borough Importance for Nature Conservation.	The support in these comments is noted.
1129	Ian Anderson, Lichfields on behalf of David Lloyd Leisure Ltd (David Lloyd)	Policy 39 – site specific SINC designation	<p>The David Lloyd site is historically set within an ‘Other Sites of Nature Importance’ (OSNI).</p> <p>Supporting evidence to the new draft plan notes previous versions of Local Plans and their associated Policies Maps have identified Other Sites of Nature Importance (OSNIs) as those sites which have either been classified as having importance for biodiversity or have the potential to have biodiversity.</p> <p>We note that the Plan and evidence base proposes that the OSNI site terminology is being updated as part of draft Plan and brought in line with the London Plan; such that these sites are now be identified as Sites of importance for Nature Conservation (SINCs).</p> <p>The evidence base includes the Salix Ecology Review of Sites of Importance for Nature Conservation in Richmond upon Thames (November 2021). This Supporting evidence notes there is limited access to David Lloyd, golf club and allotments, albeit there are public footpaths through the area. The David Lloyd is excluded from the SINC.</p> <p>Appendix 4 of the draft Plan contains a plan illustrating the sites of nature conservation, including the Fulwell and Twickenham Golf Course (13). An extract of this is contained below.</p> <p>This Plan confirms the whole of the David Lloyd, its car park and tennis / external areas (in grey) excluded from the nature conservation designation: a position which we would support.</p>	The golf practice area identified is an area of semi-improved grassland which is increasingly uncommon in London, therefore the Council will take forward the proposed SINC in the Regulation 19 Local Plan. This will not affect the existing use of the site as a golf practice area.

			 <p>Work undertaken on behalf of the Council as background to the Review of Sites of Importance for Nature Conservation in Richmond upon Thames (Volume 2): Supporting information Produced for the London Borough of Richmond upon Thames November 2021 further summarises RiB07 in plan form, extract below.</p> <p>This confirms the David Lloyd Club, its car park and tennis court are removed from a nature conservation area designation area, and moreover confirms the land to the south of the club of neutral grassland, confirming the Salix Ecology work. Given this forms part of the golf practice area we dispute this is 'semi-improved' given it is regularly cut to facilitate its use by the Club. Having regard to this, we consider this element of the proposals can also be removed from the SINC, in it providing very little contribution to the SINC designation.</p> <p>The SINC boundary around and excluding the club should therefore be re-drawn to exclude that area indicated orange in the below plan.</p> <p>RiB07 Fulwell and Twickenham Golf Courses</p>  <p>London Borough of Richmond Upon Thames Ordnance Survey Licence Number 100019441</p> <p>Figure 41: Fulwell and Twickenham Golf Courses</p>	
1130	Gary Backler, Friends of the River Crane Environment (FORCE)	Policy 39. Biodiversity and geodiversity; and Appendix 4	<p>We support the addition of the new Sites of Importance for Nature Conservation, the proposed expansions of existing SINC, and the upgrading of SINC from Local to Borough importance. In particular we welcome the upgrading of Twickenham Junction Rough to Borough Grade SINC and of Portlane Brook and Meadow to Metropolitan Grade SINC. We support all of the Candidate SINC, in particular Kneller Gardens, the Twickenham Bridge, Marsh Farm and Hatherop Road Allotments, Challenge Court Open Space and Kneller Hall. We would ask the Council to give serious consideration to the way in which appropriate public access could be secured for as many of these new SINC as practical.</p>	The support in these comments is noted.
1131	Theresa Oddelm, The Royal Parks	Review of Sites of Importance for Nature Conservation in Richmond upon Thames (Salix Ecology, 2021)	<p>The recommendations listed below are included within the report and impact on sites managed by The Royal Parks. We have commented accordingly beneath the quoted paragraphs highlighted in <i>italics</i>.</p> <p>M082 Richmond Park and Associated Areas:</p> <p>We have comments relating to the following two paragraphs:</p> <p><i>5.3.10 Add in additional land, including areas of amenity grassland and a small allotment at Palewell Park to ensure continuity of Semi-natural habitat and a wildlife corridor to the Beverley Brook SINC. Include additional areas at the Richmond Park Golf course as a buffer/additional semi-natural habitat to the site.</i></p> <p><i>5.3.11 adjust the site boundary adjacent to Petersham Meadows.</i></p>	Noted. In response to the comments made against M082 Richmond Park and Associated Areas, the assumptions made are correct. The Council are not able to preclude existing uses from proposed SINC sites.

			<p>It is assumed that the 'additional areas at the Richmond Park Golf course' comprise the two small Expansion areas on the eastern boundary of the site. Please note that these comprise: an existing overflow car park to the adjacent Roehampton Gate car park (which is included within the existing SINC boundary); and an existing golf driving range largely comprised of closely mown grassland and boundary scrub.</p> <p>On the assumption that inclusion of these areas within the SINC boundary will not preclude the existing use explained above, there is no objection to these proposals. Other extension areas are on land outside of TRP control.</p> <p><u>M084 Bushy Park and Home Park</u></p> <p><i>5.3.13 Incorporate National Physical Laboratory (NPL) land into the SINC. NPL land holdings include extensive areas of acid grassland, a habitat of Principal Importance. Whilst this is currently closely mown, a change of management of selected areas to enhance this habitat may be possible. There is a large area of unmanaged woodland with mature oaks. Although there is understory of rhododendron and other non-native invasive species, restoration to parkland or native woodland habitat is feasible. The habitats located within this area warrant their inclusion in the SINC boundary. There is no objection to these proposals.</i></p> <p><u>RiB06 Longford River in Richmond</u></p> <p><i>5.3.17 Pantile Bridge Open Space, at the junction of Uxbridge Road and High Street Hampton Hill to be added to the existing SINC. Whilst not of high nature conservation value, this small area of amenity grassland acts as a buffer to the SINC. There is no objection to these proposals which would provide a buffer to the Longford River.</i></p>	
1132	David Wilson, Thames Water	Policy 39 Biodiversity - M085 Hampton Water Treatment Works and Reservoirs Nature Conservation Designation	<p>In the Review of Sites of Importance for Nature Conservation in Richmond upon Thames, it is recommended that Hampton Water Treatment Works (WTW) SINC is upgraded to a Site of Metropolitan Importance and amalgamated with Stain Hill and Sunnyside Reservoirs to create 'Hampton Water Treatment Works and Reservoirs' Site of Metropolitan Importance.</p> <p>Hampton WTW is a key operational site which should not be unduly constrained by additional planning designations. It is considered that the proposal to upgrade the WTW to a site of metropolitan nature interest is flawed based on the presence of all of the WTW infrastructure development on the site similar to industrial processes and that the proposed upgrade is not evidenced from site surveys. The reservoirs identified are part of the water treatment process and are not suitable for the creation and enhancement of new habitats, as it is important that they are able function fully in line with operational requirements. Furthermore, the full developed Hampton WTW site is also proposed to be included, which is anomalous as it is a developed site with buildings, roads and hardstanding, and no natural/green space. The assessment of the site sets out 'potential' to improve biodiversity conditions. These suggestions of reduced mowing is considered to be fundamentally incompatible with the operation, as there are clear justifications for mowing the grass in operational areas, as it is important for the inspection and identification of any risks or structural issues.</p> <p>Thames Water has strong commitments to biodiversity to its regulator, Ofwat, which includes identifying Sites of Biodiversity Interest where biodiversity can be enhanced at specific sites without affecting operations.</p> <p>Whilst certain areas may be temporarily not be in use they are retained for future operations and will be key to London's ongoing water supply improvements.</p> <p>We therefore object to this proposal to upgrade the nature designation.</p>	<p>The Council's 'Review of Sites of Importance for Nature Conservation in Richmond upon Thames Volume 2: Supporting information' sets out that the SINC designation relates to the grasslands surrounding the filter beds, reservoirs and buildings – the principal use for the site and the proposed SINC designation are not incompatible. Table 10 in the Volume 1 report states that there is potential to 'relax mowing over the summer in selected areas of neutral grassland around reservoirs and in other areas within the operation water treatment works where this would not interfere with Thames Water operations' and "create conditions for tower mustard at the Stain Hill reservoir by scraping selected areas of grassland around the reservoirs." London Plan Policy G6 compels local authorities to identify SINCS and ecological corridors in order to develop ecological networks.</p>



All responses received to the Pre-Publication Draft Local Plan (Regulation 18)

https://www.richmond.gov.uk/services/planning/planning_policy/local_plan/draft_local_plan/draft_local_plan_pre_publication_version

Consultation from 10 December 2021 until 31 January 2022

Published by LBRuT May 2022

Appendices:

1. Hannah Gray, Avison Young on behalf of National Grid
2. David Wilson, Thames Water
3. Vincent Gabbe, Knight Frank, on behalf of Harlequin Football Club Limited
4. Emma Penson, DWD on behalf of Dukes Education Group and Radnor House School Limited
5. Marie Lewis
6. Nick Alston, Avison Young on behalf of St George Plc and Marks & Spencer
7. George Goodby, Environment Agency
8. Ben Fox, Planware LTD on behalf of McDonald's Restaurants LTD
9. Faye Wright, Forward Planning and Development on behalf of BMO Real Estate
10. James Sheppard, CBRE, on behalf of LGC Ltd
11. David Taylor
12. Hannah Blunstone, CBRE on behalf of Rugby Football Union (RFU)

National Grid is able to provide advice and guidance to the Council concerning their networks and encourages high quality and well-planned development in the vicinity of its assets.

Electricity assets

Developers of sites crossed or in close proximity to National Grid assets should be aware that it is National Grid policy to retain existing overhead lines in-situ, though it recognises that there may be exceptional circumstances that would justify the request where, for example, the proposal is of regional or national importance.

National Grid's '*Guidelines for Development near pylons and high voltage overhead power lines*' promote the successful development of sites crossed by existing overhead lines and the creation of well-designed places. The guidelines demonstrate that a creative design approach can minimise the impact of overhead lines whilst promoting a quality environment. The guidelines can be downloaded here: <https://www.nationalgridet.com/document/130626/download>

The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site.

National Grid's statutory safety clearances are detailed in their '*Guidelines when working near National Grid Electricity Transmission assets*', which can be downloaded here: www.nationalgridet.com/network-and-assets/working-near-our-assets

Gas assets

High-Pressure Gas Pipelines form an essential part of the national gas transmission system and National Grid's approach is always to seek to leave their existing transmission pipelines in situ. Contact should be made with the Health and Safety Executive (HSE) in respect of sites affected by High-Pressure Gas Pipelines.

National Grid have land rights for each asset which prevents the erection of permanent/ temporary buildings, or structures, changes to existing ground levels, storage of materials etc. Additionally, written permission will be required before any works commence within the National Grid's 12.2m building proximity distance, and a deed of consent is required for any crossing of the easement.

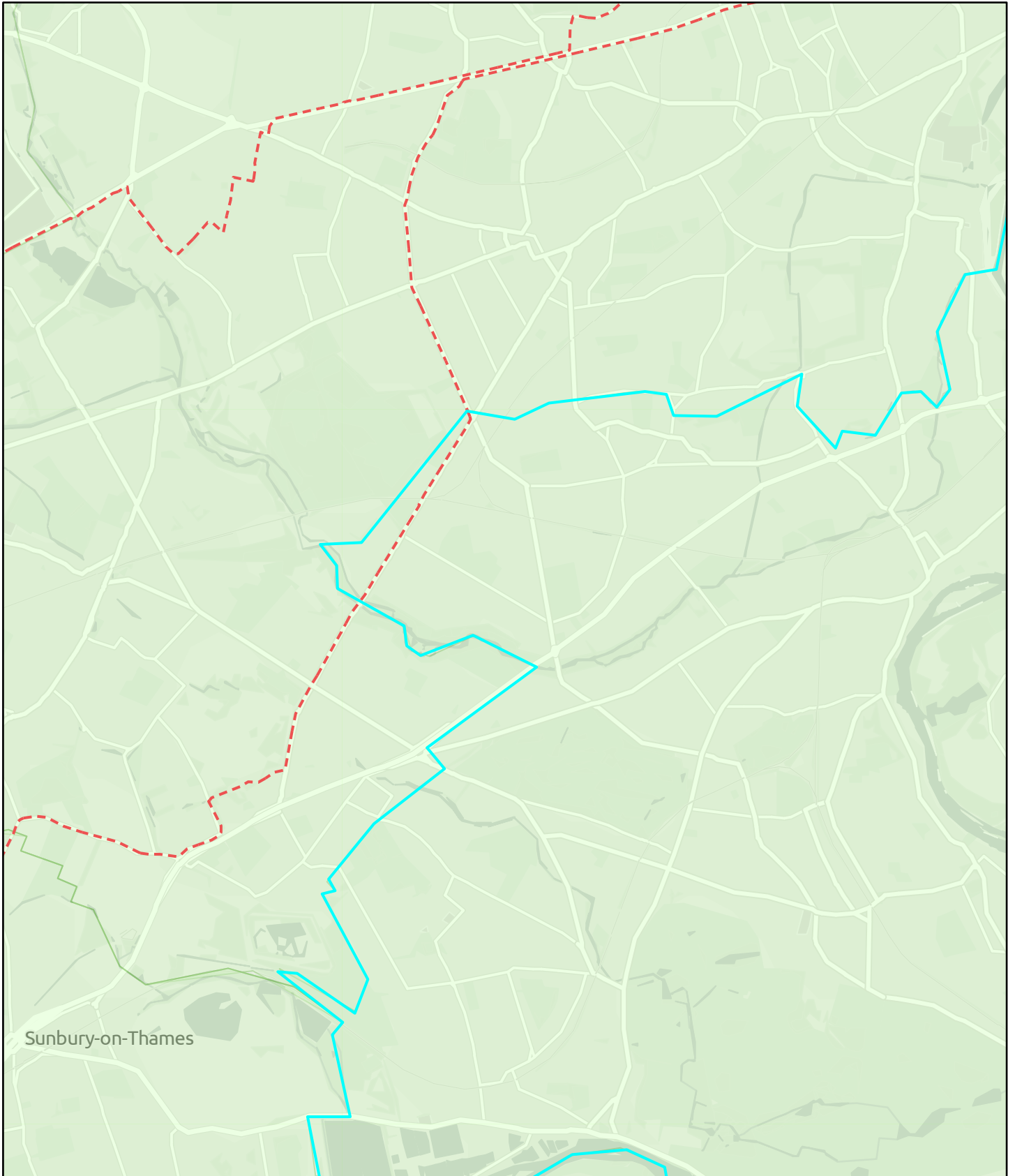
National Grid's '*Guidelines when working near National Grid Gas assets*' can be downloaded here: www.nationalgridgas.com/land-and-assets/working-near-our-assets

How to contact National Grid

If you require any further information in relation to the above and/or if you would like to check if National Grid's transmission networks may be affected by a proposed development, please visit the website: <https://lsbud.co.uk/>

For local planning policy queries, please contact: nationalgrid.uk@avisonyoung.com

Local Plan Pre-Publication Consultation



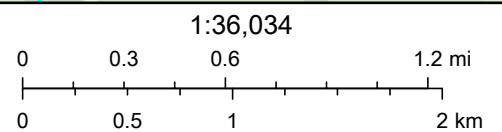
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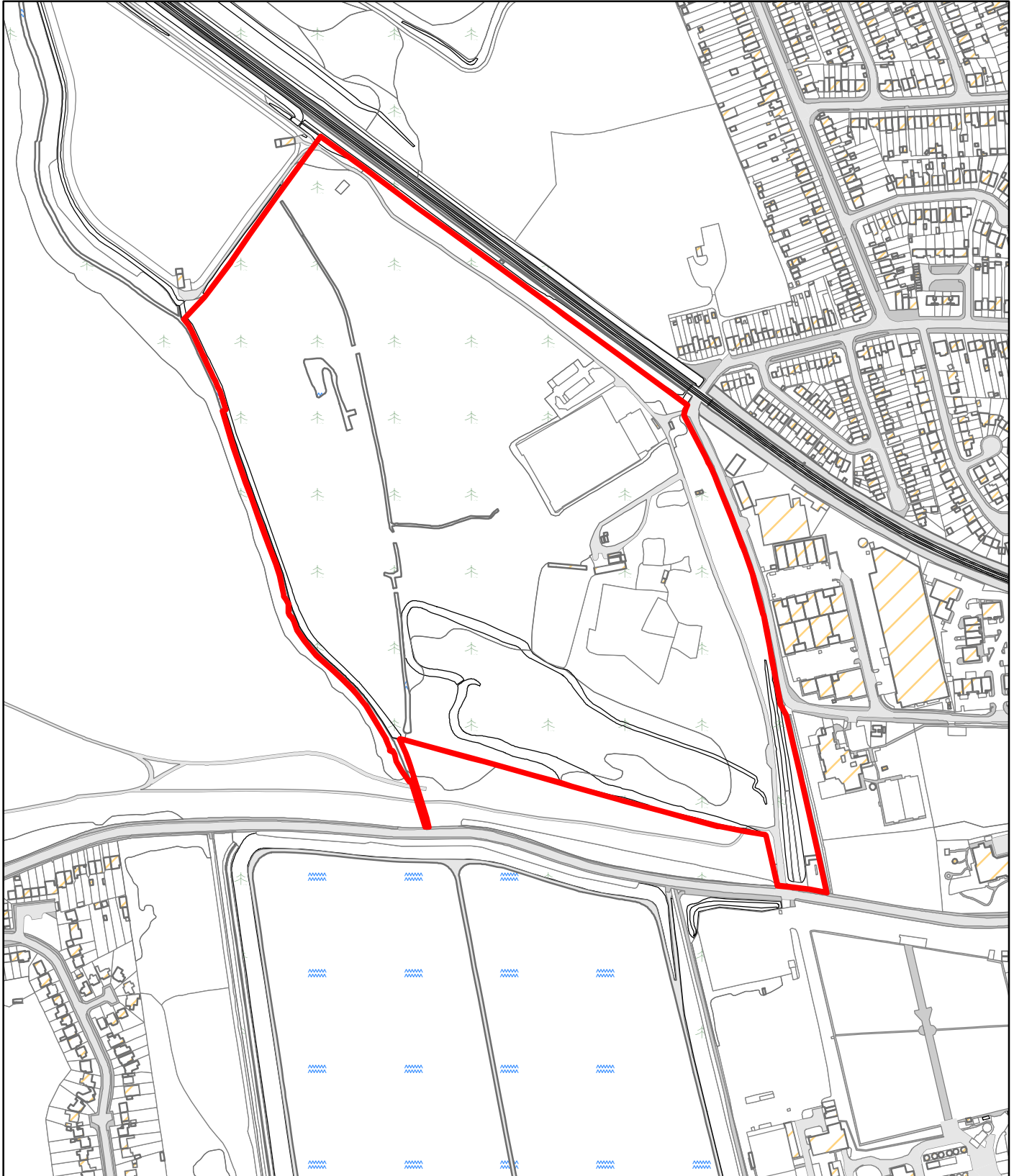
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Contains OS data © Crown Copyright and database right 2020
Contains data from OS Zoomstack

Hydes Field, Upper Sunbury Road - Site Location Plan



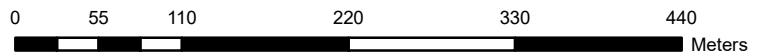
Thames Water
Map



Printed By : twalsh
Print Date : 25/01/2022
Map Centre On: 512346, 169940
Centre Tile No. : TQ1269NW

Comments:

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Current Scale : 1:5,000

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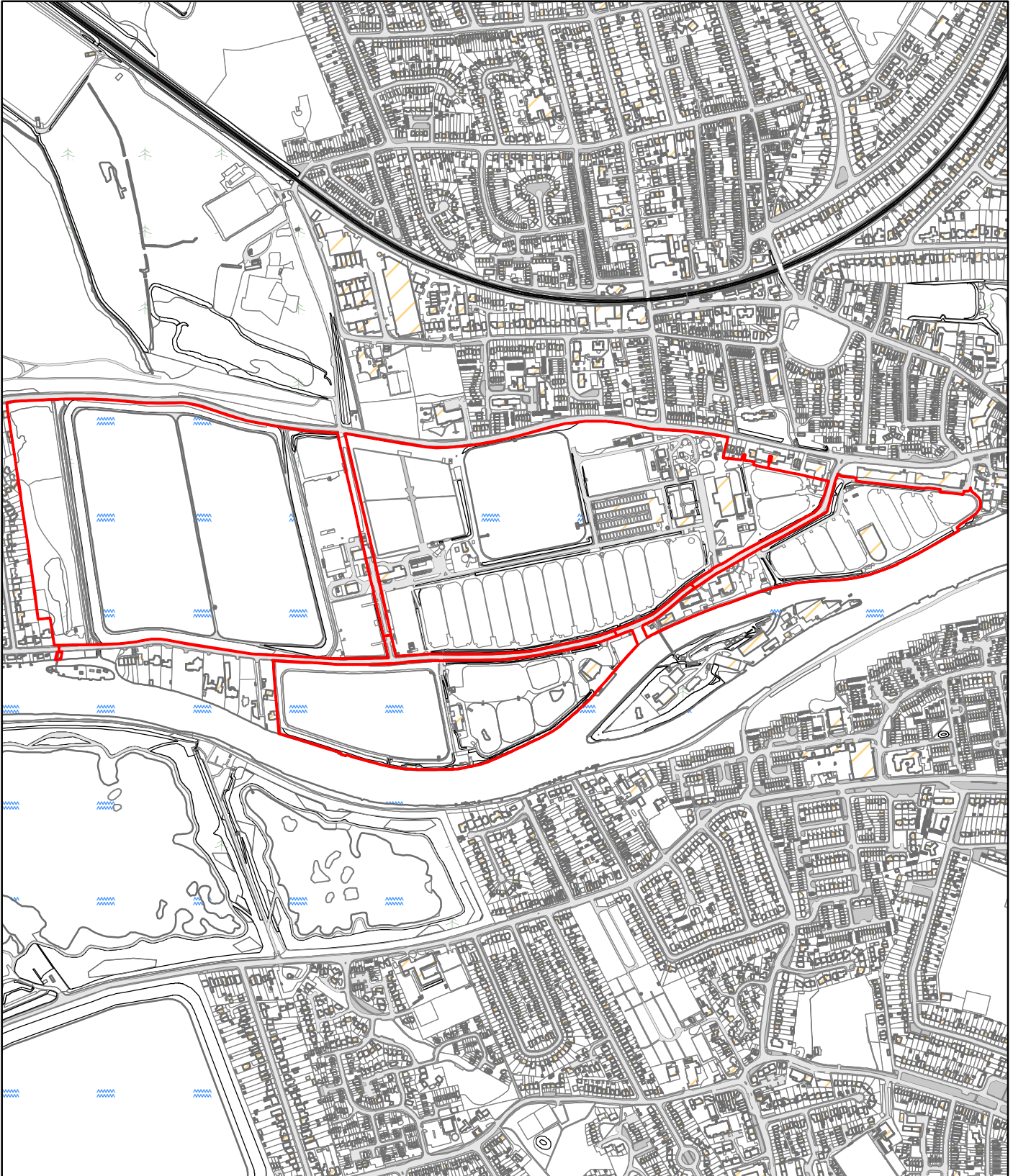
The position of any boundary or apparatus shown on this plan is given without obligation and warranty, and the accuracy cannot be guaranteed.

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HAMPTON WTW LOCATION PLAN



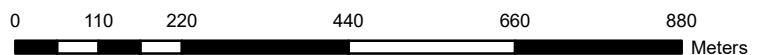
Thames Water
Map



Printed By : twalsh
Print Date : 25/01/2022
Map Centre On : 512896, 169255
Centre Tile No. : TQ1269SE

Comments:

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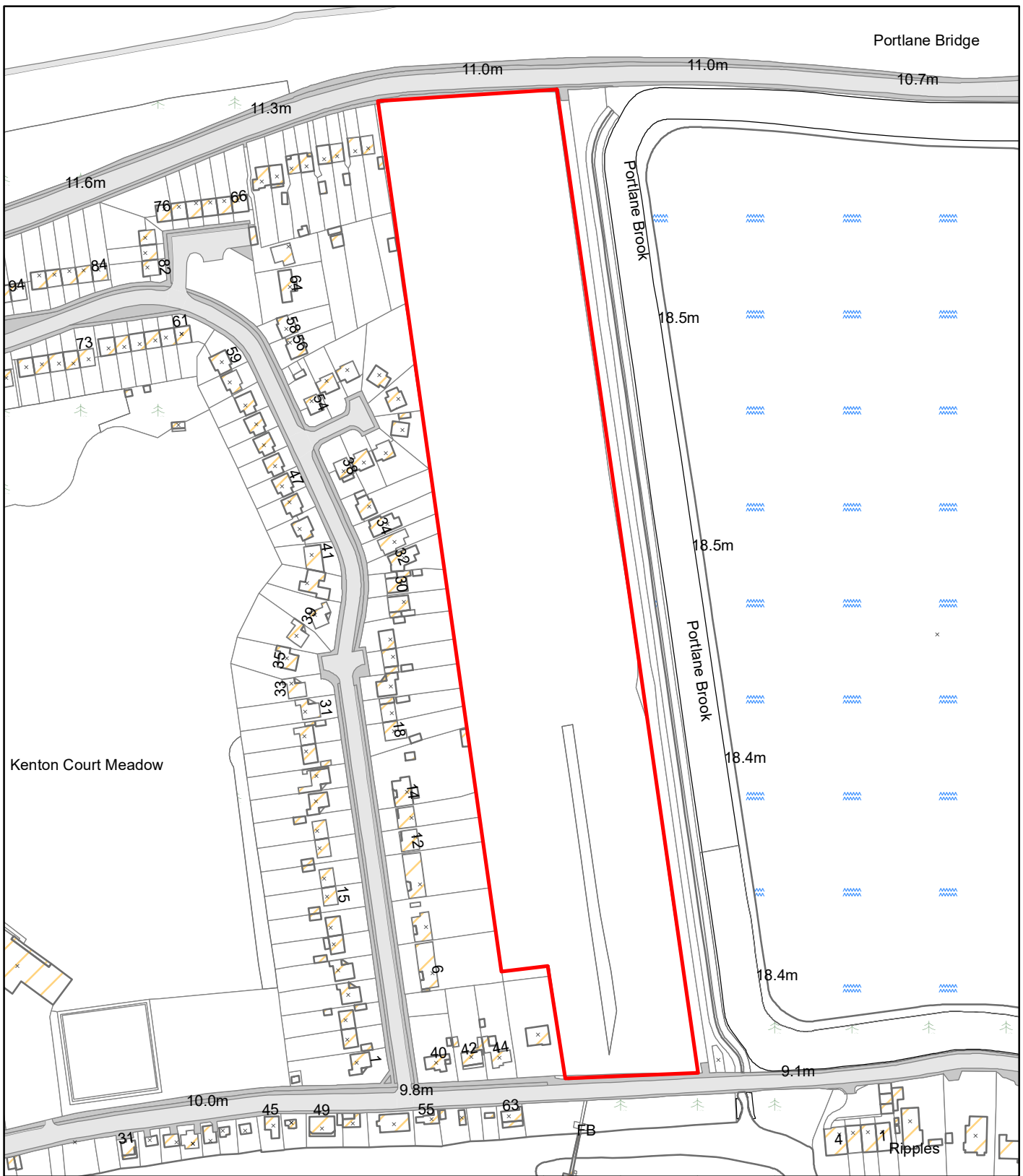
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Land west of Stain Hill Reservoirs, Lower Sunbury Road - Site Location Plan



Thames Water Map

Printed By : CCOLLOFF
 Print Date : 28/01/2013
 Map Tile Name: 58480

0 15 30 60 90 120
 Meters
 Current Scale : 1:2,500



Comments:

Please enter comments here:

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LONDON BOROUGH OF RICHMOND UPON THAMES LOCAL PLAN DIRECTION OF TRAVEL CONSULTATION

Contents

1. Introduction
2. Site Description
3. Housing Need
4. Potential Land Uses
5. Site Opportunities
6. Masterplan Concept
7. Next Steps

1. Introduction

- 1.1 The recently published London Borough of Richmond Upon Thames Local Plan Direction of Travel Consultation document includes a request for landowners to identify sites in the borough that may be suitable for future development.
- 1.2 The following representations identify the Harlequin Football Club site (also known as the Twickenham Stoop) and the adjacent Twickenham Central Depot site as a major mixed-use redevelopment opportunity. Harlequin Football Club has been in dialogue with the Council regarding this opportunity for a number of years.

2. Site Description

- 2.1 A site location plan is included as Appendix A, and a detailed description of both sites is set out below. The combined total area of both sites is 9.7 hectares, which represents one of the largest and most important strategic redevelopment opportunities in the entire borough.

Harlequin's Site

- 2.2 Harlequin Football Club Limited, the site owner, is located on a triangular parcel of land to the south of the A316. The Site is bounded to the west by the "Duke of Northumberland River" and beyond that by the large Rosebine car park and an estate of residential properties which form part of the Rosecroft Gardens Conservation Area. Richmond Upon Thames College is located to the east of the site, itself going through a major redevelopment.
- 2.3 The stadium comprises four stands, the Eastern Stand was constructed in 1996 and has a capacity for circa 4,042 spectators, with accommodation at ground and first floor level which is utilised for corporate hospitality and entertainment on match days and corporate events / meetings and private functions on non-match days. The southern end of the ground was redeveloped in 2006, with the demolition of the existing uncovered stand and

the installation of a temporary Southern Stand which holds a capacity for circa 4,100 spectators, with ancillary educational facilities beneath.

- 2.4 The Western end of the ground was redeveloped in 2005, with the demolition of the previous Western Stand and groundman's house and installation of a covered stand with a capacity for 3,881 spectators along with ancillary features including, players and officials facilities, club offices, club shop, a Members bar, 13 corporate hospitality boxes, an Executive club and two lounges.
- 2.5 To the east of the Eastern Stand lies a triangular parcel of accessible open land, which had previously been utilised by the club for training along with hospitality events. In 2005, planning permission was granted for the development of a four-storey block of flats (67 units) on a portion of the open land as enabling works to fund the development of the Western Stand. The residential block includes both social and private housing and is known as "Challenge Court". The remaining area of open land has been retained as publicly accessible open space.
- 2.6 Substantial open car parking facilities are provided on site between the stadium and the A316, providing approximately 400 on site car spaces.
- 2.7 A Nuffield Health Gym is located on the eastern boundary of the Site and is within the land ownership of Harlequin Football Club.
- 2.8 Vehicular access to the Site is provided via the A316, with a left turn into / out of the A316. The access road also serves the Twickenham Central Depot, with a branch route into the College Site, for use as an emergency access route by the club. The College has a right of access to use Langhorn Drive to serve its site. This junction is being significantly upgraded in the summer of 2020 to provide a traffic light left and right turn junction and new street level crossing.
- 2.9 The Duke of Northumberland River forms the western boundary of the Site, with the Twickenham Central Depot and area of green open space located to the south of the Site.

Twickenham Central Depot Site

- 2.10 The Depot Site, owned by Richmond Upon Thames Council, is located immediately to the south of the Harlequin's stadium. The Site is bounded by the Richmond Upon Thames College Site to the north-east, and the Craneford Way recreation area with playing fields and children's playground to the east. The western edge of the Site lies along the path of the Duke of Northumberland River, with residential properties at Rose Croft Avenue beyond, and the main London to Reading railway line to the south.
- 2.11 The West London Waste Plan (2015) identifies that the Site has been used for the following purposes:
 - for the parking of refuse and recycling vehicles;
 - material recovery facility (MRF); and

- bulking facilities to support municipal recycling services, for a continuous period over the last 10 years.

2.12 There are a few structures currently onsite, including a two-storey residential property, prefabricated offices, a redundant Victorian brick building also known as the former pumphouse, bulking bays, workshops and covered vehicle storage.

3. Housing Need

3.1 The Local Plan Direction of Travel Consultation document identifies housing delivery and meeting the housing targets set out in the London Plan as one of the key reasons why a new Local Plan is required.

3.2 The Intend to Publish version of the London Plan (December 2019) provided Richmond with a new housing target which was substantially higher than the target set out in the adopted London Plan. The ten-year delivery target for the period from 2019/20 to 2028/29 is 6,440 new homes, which equates to 644 units per annum. The Direction of Travel Consultation document states that 315 new homes per annum will be delivered in the borough between 2015 and 2025, which highlights a major shortfall.

3.3 To compound this particular issue, publication of the Local Plan Direction of Travel Consultation has been followed by a letter from the Secretary of State for Housing, Communities and Local Government to the Mayor of London, directing him to make changes to the new draft London Plan before it can be adopted. A relevant extract from the letter states:

“I had expected you to set the framework for a step change in housing delivery, paving the way for further increases given the next London Plan will need to assess housing need by using the Local Housing Need methodology. This has not materialised, as you have not taken the tough choices necessary to bring enough land into the system to build the homes needed.”

3.4 Taking account of the above, one can expect that housing targets for individual boroughs will further increase in the short term. Through the new local plan process, it is therefore imperative that the Council seeks to promote the consolidation and intensification of large underutilised sites in the borough and targets the least constrained sites for higher density development. It is our strong view that redevelopment of the Harlequin’s site and the Twickenham Central Depot site can make a significant contribution to achieving these targets, whilst at the same time easing the pressure on other more sensitive parts of the borough.

3.5 As suggested in the Direction of Travel consultation document, we support the undertaking of a borough wide Urban Design Study as a tool to help identify redevelopment opportunity sites and quantify the appropriate scale of development on individual sites.

4. Potential Land Uses

4.1 Through a well-designed Masterplan, and allowing for densities to increase on this important strategic site, we believe that it is capable of accommodating a wide range of uses, including the following:

- A significant quantum of new homes, including affordable homes, with a mix of tenures and sizes
- A new sports stadium, subject to demonstrating long term viability
- A consolidated multi-function Council Depot
- Workspace, conference and exhibition space, including incubator space for start-up businesses
- Hotel
- Student accommodation
- Health and Leisure facilities
- Retail, including bars and restaurants within the stadium

5. Site Opportunities

5.1 Redevelopment of the site to deliver such uses offers significant opportunities at a local, regional and national level for the reasons set out below.

1. **Making More Efficient Use of Land** - The existing site as a whole and particularly the existing Twickenham Central Depot is inefficient, uses more land than it needs and requires investment. A phased mixed-use redevelopment will make more efficient use of this important site in accordance with the National Planning Policy Framework and draft London Plan.
2. **A Masterplan led, Mixed Use Neighbourhood** - A thoughtfully-designed, residential and mixed-use neighbourhood that promotes health and well-being for all, including local convenience retail.
3. **Contribute Significantly to Meeting Housing Need** – Redevelopment of the site would contribute significantly to meeting Central, Regional and Local Government housing targets. There is significant marriage value of more homes from coordinated development of the depot site and the Stoop site together. A masterplan delivering significant numbers of homes of varying size and tenure would generate a substantial New Homes Bonus to Richmond, and of course significant CIL and S106 contributions.
4. **New Leading-Edge Sustainable State of the Art Stadium for Harlequins** – A viable overall scheme incorporating a new Harlequin’s home 25,000 seat stadium and associated enabling development will generate multiple economic and social benefits for the borough, and secure the long-term future of Harlequins in this location.

5. **A Safe and Sustainable Community** - Creating a place that enables community ownership and participation; a place with identity where you know your neighbours and your neighbourhood.
6. **Creating a Well Connected & Easy to Navigate Neighbourhood** - A people-focused neighbourhood which prioritises pedestrians, cyclists and public transport connections, underpinned by a simple and easy to navigate network of streets and routes.
7. **Designing for the Future Residents of Richmond** - A leading edge sustainable development, with the aspiration to deliver a highly sustainable stadium better than anything done before as well as zero carbon housing and utilising new technologies, serving as an exemplar for development projects in the borough.
8. **Delivering New Public Open Space** - A series of landscaped public spaces with their own individual character creating considerate transitions between the scale of areas around the new neighbourhood and the stadium.
9. **Protecting and Enhancing the Existing Landscape & Ecological Assets** - Using the site's natural assets to actively inform the design of the neighbourhood and connect to wider green and blue networks to enhance local biodiversity and public amenity.
10. **A Collaborative Approach to Working with Stakeholders** - Working with the Council together with the local resident and business community in a fully collaborative way to develop shared goals and ensure that investment benefits the local population, and specifically working with Friends of the River Crane Environment (FORCE) to genuinely improve the river corridor.
11. **Cross Pollination with Richmond College** – A redevelopment of the site would facilitate the strengthening of ties with the regenerated Richmond College and create cross-over with their education syllabus and the professional training needs at Harlequins.
12. **Investment in Richmond** - Harlequins currently makes a significant financial contribution to the Borough. Independent assessments of Gross Value Add (GVA) demonstrate the Club's contribution equates to £34 million per annum. Using the same methodology, a new stadium with associated enabling development could increase Harlequin's GVA contribution to circa £95 million per annum.

6. Masterplan Concept

6.1 Harlequins needs to invest in its club for many reasons including:

- Customer expectations from sporting experiences;
- The changing nature of rugby for example women's rugby;
- Competitors improving their facilities;

- The ability to bring the existing training facility on site;
- To remain competitive; and crucially
- The ability to remain financially sustainable.

6.2 All of the above mean that doing nothing is not an option for the club. If comprehensive redevelopment is not achievable at the Stoop, Harlequins will be forced to relocate.

6.3 Harlequin Football Club Limited has engaged the services of a full professional design team to pursue redevelopment proposals for the site, led by Populous Architects and Karakusevic Carson Architects. The images overleaf give an early visual indication as to what could be achieved on this important site.

7. Next Steps

7.1 Our team will continue to discuss our proposals with the Council and seek to engage with the local community. In the meantime, we trust that the Local Plan team will keep us informed as the consultation process progresses.

Indicative Site Plan



Sketch views of the proposed new neighborhood



Karakusevic Carson Architects



Karakusevic Carson Architects

Sketch views of the proposed new neighborhood



Karakusevic Carson Architects



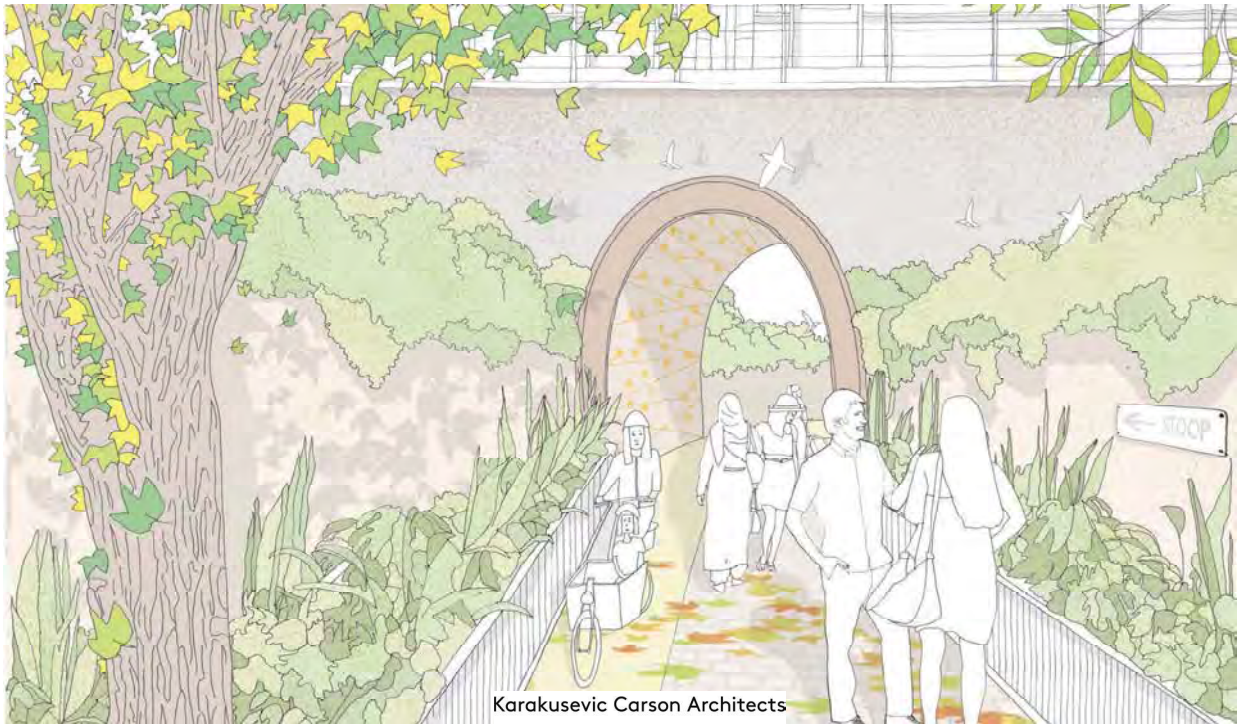
Karakusevic Carson Architects

Sketch view of proposed new bridge over the Duke of Northumberland River



Karakusevic Carson Architects

Existing railway underpass improvements



Karakusevic Carson Architects

7 Next Steps

- 7.1 Our team will continue to discuss our proposals with the Council and seek to engage with the local community. In the meantime, we trust that the Local Plan team will keep us informed as the consultation process progresses.

**APPENDIX 1
SITE LOCATION PLAN**



Harlequins Indicative Ownership Boundary

LBURT Indicative Ownership Boundary

3rd June 2021



Policy and Design
London Borough of Richmond upon Thames
Civic Centre
44 York Street
Twickenham
TW1 3BZ

DP9 Ltd
100 Pall Mall
London SW1Y 5NQ

Registered No. 05092507

telephone 020 7004 1700
facsimile 020 7004 1790

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Dear Sir or Madam

**LONDON BOROUGH OF RICHMOND UPON THAMES
EMERGING BOROUGHWIDE URBAN DESIGN STUDY**

On behalf of our client, Harlequin Football Club Limited, please find enclosed our written representations to the London Borough of Richmond Upon Thames (LBRUT) emerging boroughwide Urban Design Study.

We previously made representations to the LBRUT Local Plan Direction of Travel Consultation in April 2020, specifically identifying the Harlequin Football Club site (also known as the Twickenham Stoop) and the adjacent Twickenham Central Depot site as a major mixed use redevelopment opportunity. A copy of our previous representations is attached for ease of reference.

We understand that the emerging Urban Design study seeks to divide the borough into a series of distinct 'character areas', based on common features and characteristics such as building types, heritage, open space, land use, settlement pattern and sense of place.

The Council's website explains that defining, describing and evaluating the character areas will help LBRUT to understand what and where the potential opportunities are for future change. The Urban Design Study will also help the Council to follow a 'design-led' approach to achieve good growth, in the right places, as well as protecting the special qualities of particular areas and recognising where growth is not appropriate.

The Harlequin Football Club site (also known as the Twickenham Stoop) has been included in the 'Twickenham - Residential' character area, which comprises the majority of the Twickenham area excluding the Town Centre.

Our view is that the collection of adjacent sites comprising the Twickenham Stoop, the Twickenham Central Depot and the Richmond Upon Thames College is very different in character to the surrounding area, both in terms of existing land uses (sport, leisure, education, employment & residential uses) and the existing scale of development. The site benefits from a prominent main road frontage to the A306, does not incorporate any heritage assets and is generally inefficient in terms of its use of land. It presents significant opportunities for redevelopment.

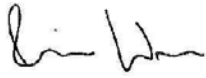
For these reasons we submit that this smaller area merits its own character area designation to be titled Twickenham - Mixed Use.

We welcome the proposed engagement with young people to inform the Urban Design Study, but also consider it appropriate and necessary for the Council and its appointed consultants to engage

directly with major landowners in the borough at an early stage in the process to best understand their short, medium and long term aspirations.

We trust that we will be kept informed during the next stages of the consultation process, and in the meantime, please contact me directly should have any queries.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Richard Ward', written in a cursive style.

Richard Ward
Board Director
DP9 Ltd

APPENDIX 1 – CURRENT DRAFT MASTERPLAN



- 1. Classroom Extension
- 2. Sports Facilities
- 3. Performing Arts
- 4. Sports Pavillion
- 5. Sports Pitches



RIBA 0

REVISION	DATE	DESCRIPTION	ARCHITECT PARTNER

CHECK ALL DIMENSIONS AND VERIFY ON SITE. REPORT ANY ERRORS OR OMISSIONS



The Fire Station
 150 Waterloo Road
 London
 SE1 8SB
 T +44 (0) 20 7089 1720
 E london@adp-architecture.com
 www.adp-architecture.com

JOB TITLE:
KNELLER HALL SCHOOL

DRAWING TITLE:
MASTERPLAN DEVELOPMENT PROPOSALS

SCALE: **As indicated** DRAWING SHEET SIZE: **A3**

JOB CODE: 001506	DRAWING NUMBER: 0019	REVISION:
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1 Masterplan Development Proposals

1 : 2000

APPENDIX 2 – LETTER FROM PROJECT COST CONSULTANTS



2 London Bridge
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+44 20 3176 2375

1804 HDS Tower
JLT Dubai
PO Box 283639
+97 14 447 0370

www.wearelxa.com
info@wearelxa.com

Date: 27/01/2022
Our ref: 1629

Spatial Planning and Design
LB Richmond upon Thames
Civic Centre
44 York Street
Twickenham
TW1 3BZ

Dear Sir or Madam,

**RE: DRAFT LOCAL PLAN PRE- PUBLICATION REGULATION 18 CONSULTATION – APPENDIX 2
– COST PLAN AND ESTIMATED BUDGET ASSOCIATED WITH THE PROPOSED PROJECT**

LXA has been appointed by Dukes Education Group and Radnor House School, to provide Project Management, Quantity Surveying and Design services associated with the proposed project at Kneller Hall. The proposed masterplan is as set above in the main contents of the letter by DWD, pages 2-4, "Proposals for Kneller Hall".

Our client has acquired the freehold interest in the entire site. The ambition of Dukes Education is to be at the top of the education sector, and continuously evolve to achieve this, investing both in assets and human resources. The acquisition investment and further investment into the construction and conversion works at Kneller Hall is a key part of their ambitions.

They have now committed to this significant investment, in order to provide a prestigious educational setting in Kneller Hall for the future students. This represents one of their biggest investments so far, for Dukes Education, taking into consideration the existing site that was bought for this purpose, and Grade II Listed buildings within, it makes it one of the most exciting too.

LXA has undertaken a thorough cost analysis and produced a cost plan for the proposed works. It is a draft cost plan at this stage and it will need to be updated as the proposals are refined with the client and through engagement with the London Borough of Richmond Council.

There are significant costs currently forecast to restore and convert the three listed buildings (Kneller Hall, Guard Room and Band Practice Hall). The works associated with these building alone are estimated to cost over £7million. This investment into the buildings is to remove the unsympathetic alterations undertaken by previous owners; to undertake repair works to restore the properties and to ensure their long term protection; and to ensure the works associated with the school use are undertaken sympathetically. Kneller Hall is proposed to be converted to provide 6th form teaching accommodation, the Guard Room and Band Practice Hall will also be converted to teaching spaces, most likely for music and drama. As well as this initial investment, there will also be ongoing maintenance costs that Dukes are committed to undertaking to ensure the long term protection of the listed buildings.

In addition to the investment associated with the listed buildings, Dukes are making further significant investment at the site to provide high quality and modern teaching facilities and sports



facilities. The forecast costs to restore the existing accommodation sites and to deliver new build teaching accommodation, a Multi-purpose Sports Hall and a Performance Auditorium are forecast to cost around £13.5million. Further to this, works to the Forest School, Pavilion, Bandstand and external landscaping will cost a total of around £2.5million.

Further costs associated with this project include preliminaries, internal furnishings and professional fees to be in the vicinity of £6million.

Total costs for the full construction and delivery of the project have been estimated at around £29million excluding VAT.

Alongside our client we are working to obtain further structural advice, heritage advice and other specialist input and guidance, to enable us to further refine the costs associated with restoring and refurbishing the listed buildings and also delivering the new build accommodation.

The costs associated with restoring and refurbishing the listed buildings are a significant proportion of the overall costs. Dukes have shown particular interest, appreciation and respect for historical buildings as many other of their schools are accommodated in Listed Buildings. They are therefore experienced at converting listed buildings sensitively to meet modern education needs. Heritage specialists are advising on the works to the listed building, to ensure that these works are undertaken to a high standard and are sensitive to the building's historic significance.

If the Council would like any further information at this stage on our involvement and the costs associated with the scheme, we would be happy to discuss this further with you.

Yours sincerely

Adam Forster

Adam Forster
Quantity Surveyor

Query/objection on siting of tall building zone - North Sheen

Page 111 of the proposed Local Plan
Regulation 18; **Site Allocation 28 – Homebase, Manor Road**

The site has been allocated as being suitable for a tall-building zone, and a mid-rise buffer zone, following on from the findings in the Urban Design Study 2021

The Urban Design Study 2021 identifies part of the site as a tall building zone (7-8 storeys), with a mid-rise zone buffer (5-6 storeys), in accordance with Policy 45 Tall and Mid-Rise Building Zones

While not against development of this site and provision of much-needed new homes and/or social housing, **I strongly object to the siting of buildings above 6 storeys on this site, due to the severely detrimental effects regarding overshadowing, loss of light, and overbearing and deleterious impact on the surrounding roads of locally designated character buildings of townscape merit.**

The site is not in a town centre, nor close to an 'accessible' transport hub, and such, **the siting of mid-rise, and especially tall buildings here, directly contravenes Policy 45; Parts A 1,2,3,4,5,7,& 9 regarding Visual Impact/Spatial Hierarchy; Parts B 1,2,3, & 4 regarding effects on character of surroundings; and additionally Policies 44 & 28, regarding local character and design quality.**

Further, **the damage to existing residents' wellbeing due to overshadowing and loss of light for long periods of the day, leaving some below BRE standards, is in direct contravention with Policy 46; Amenity and Living Conditions; Parts 1,3 & 4, regarding unacceptably adverse impact on neighbours from loss of daylight and negative impact on enjoyment of their homes and amenity.**

The proposal for this site seems not to have followed the central siting recommendations as it has for other sites: the tall and mid-rise building zone for the Homebase isn't positioned central-southerly where it would have the least impact on existing residents... Rather, it's positioned at the NW edge of the site, with no true buffer zone, and so forgets that there are houses directly the other side of the railway, and further, neglects to take in to account the southerly position of the sun in the Northern hemisphere where shadowing is always worse and most detrimental to those northerly of taller developments. As such, it will cast long shadows over the NW residents for most of the day in winter, all the way across St George's, Bardolph, Victoria Villas, Trinity etc & beyond Raleigh Road.

When you look more closely at the 'heat map' in the Urban Design Study (p.255, and pasted below for reference) no true or sufficient buffer has been given to residents on the NW of the site, especially those directly next to the railway/site border on Bardolph Road and the southerly side of St. George's Road. These residents, along with those on Trinity Road and Trinity Cottages, are those who stand to be most detrimentally affected by taller buildings on the site blocking their light and overshadowing, especially in winter months. Residents on Bardolph Road and the end of Trinity Rd and Trinity Cottages will have their homes left below acceptable BRE standards for light.

The report mentions the locally designated buildings of character on the South/Easterly side of the development on Manor Grove and the surrounds, and does provide some lower-rise buffer for these homes, but it completely neglects to recognise the equivalently designated Buildings of Townscape Merit (small Victorian character cottages) on St. George's Road, Trinity Road, and Trinity Cottages.

Anything above 6 storeys will swamp these locally designated buildings of character and local merit, and have a significantly deleterious impact on daylight of existing residents, directly contravening Policies 28, 44, 45 and 46.

Homebase site Urban Design building zone map:



North Sheen, Lower Richmond Road: Tall and Mid-rise building zones



Existing prevailing height: 3 storeys

Appropriate height: 7-8 storeys (21-24m)

The zone includes the site of the existing Sainsburys supermarket and car park, to the south of Lower Richmond Road. The western part of the zone occupies the Homebase site, which recently received consent for buildings up to 11 storeys¹. If the site should come forward again in future, the recommendations from this study are that appropriate heights for the zone are up to 8 storeys to respect the small scale of the surrounding area. There are opportunities for some height within parts of the zone, although any development should assess any potential impacts on views and amenity with respect to the 2 storey, locally listed residential terraces on Manor Grove to the south. The zone is set back from Lower Richmond Road.

Mid-rise zone: Appropriate height: 5-6 storeys (15-18m)

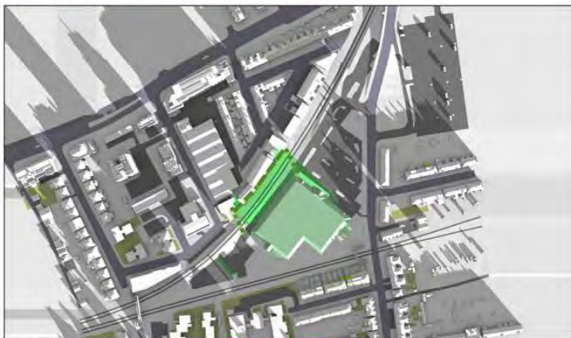
The mid-rise zone provides a transition to the smaller scale of the surrounding character area.

The Daylight and Sunlight report from the Avanton proposals for the site, demonstrates this issue well. The green shadows are today's profile (Homebase), and the blue shadows are the result of the 8,9,10, and 11 blocks on the site – **it can be seen that even the 8-storey blocks cast long shadows all the way across the A316/Lower Mortlake Road and on to Rayleigh Rd and Stanmore Rd:**

OVERSHADOWING OF NW RESIDENTS:

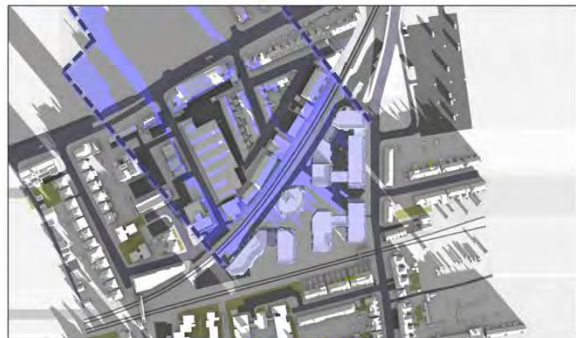
HOMES AND GARDENS IN SHADOW FOR OVER 50% OF DAY IN WINTER

EXISTING SHADOWS (GREEN):



Existing 09:00am

RESULTING SHADOWS (BLUE):



Proposed 09:00am

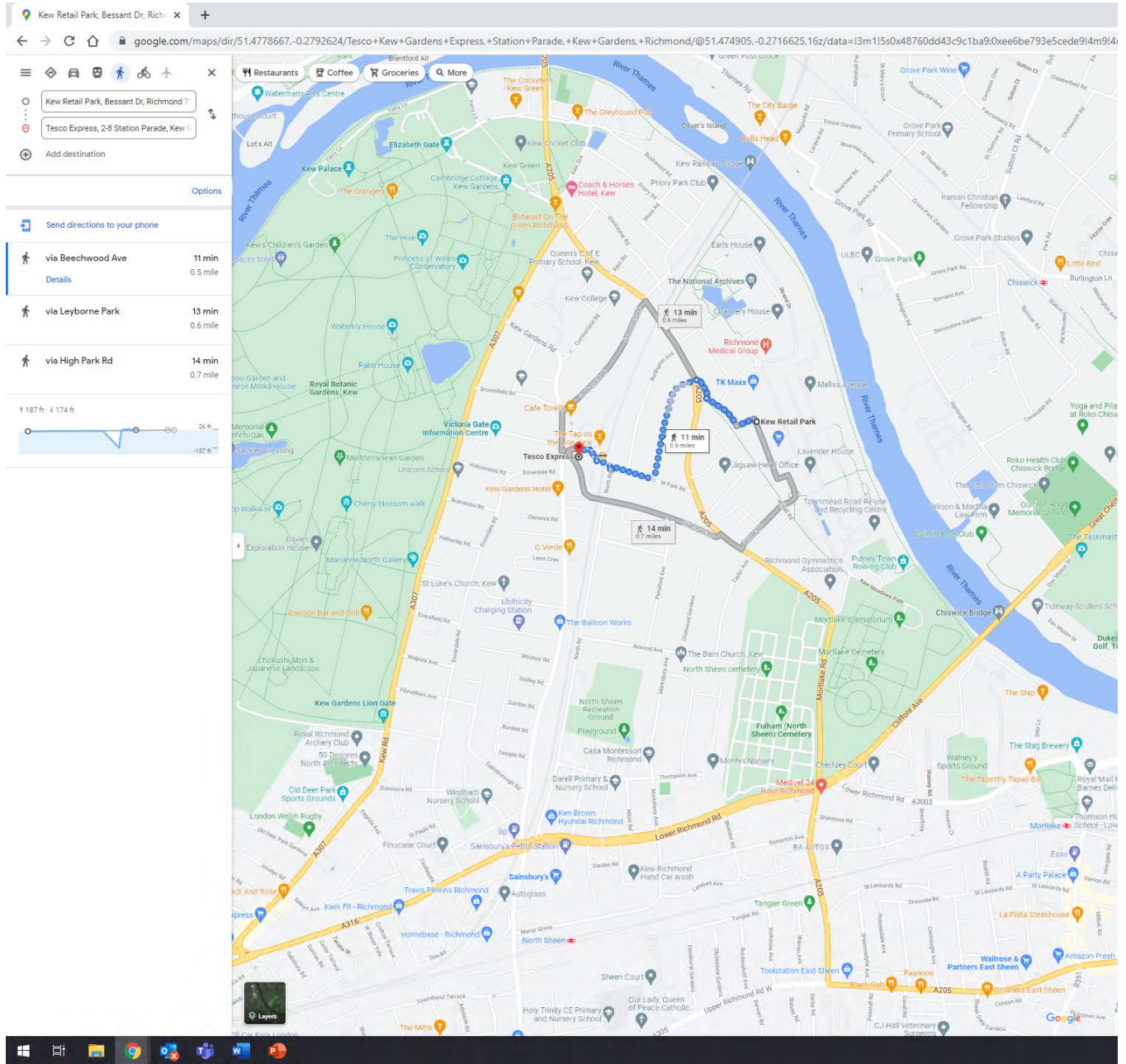
December 21st (GMT)

I note that other mid-rise designated sites in the study, for Ham, The Stoop, and Kew Retail Park, have much more sensitive height allowances and buffer zones to the North. I would welcome a discussion as to why the Urban Design Study doesn't follow its own Guiding Principles for the Homebase site, and why the Council has not looked in more detail at the deleterious impact of buildings over 6-storeys here, given that it so plainly objected to the Avanton proposals for tall buildings on this site previously, for the very same, important reasons I have outlined above.

Appendix A

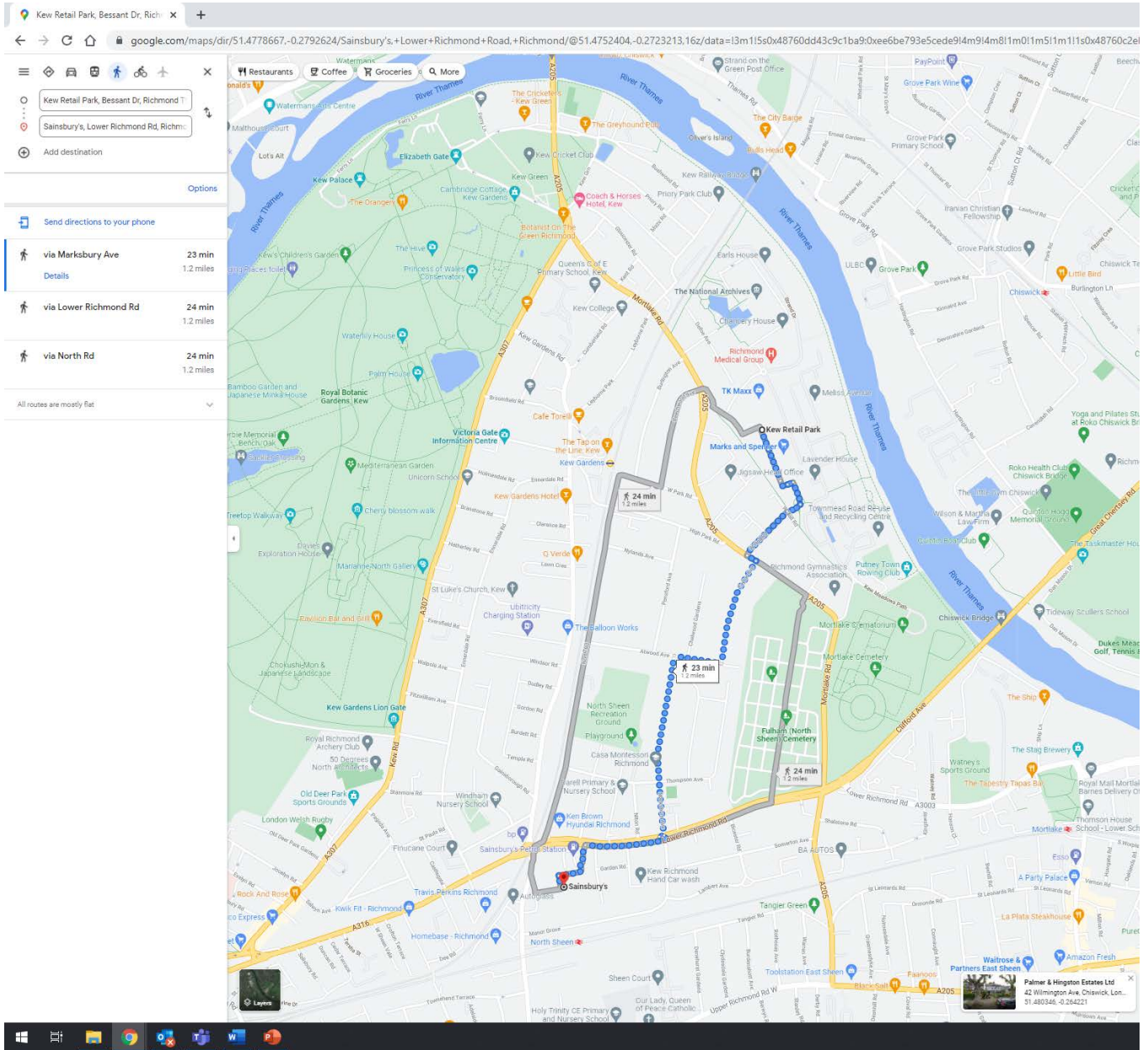
Walk-time to Supermarkets

Tesco Express, 2-8 Station Parade, Kew, TW9 3PZ



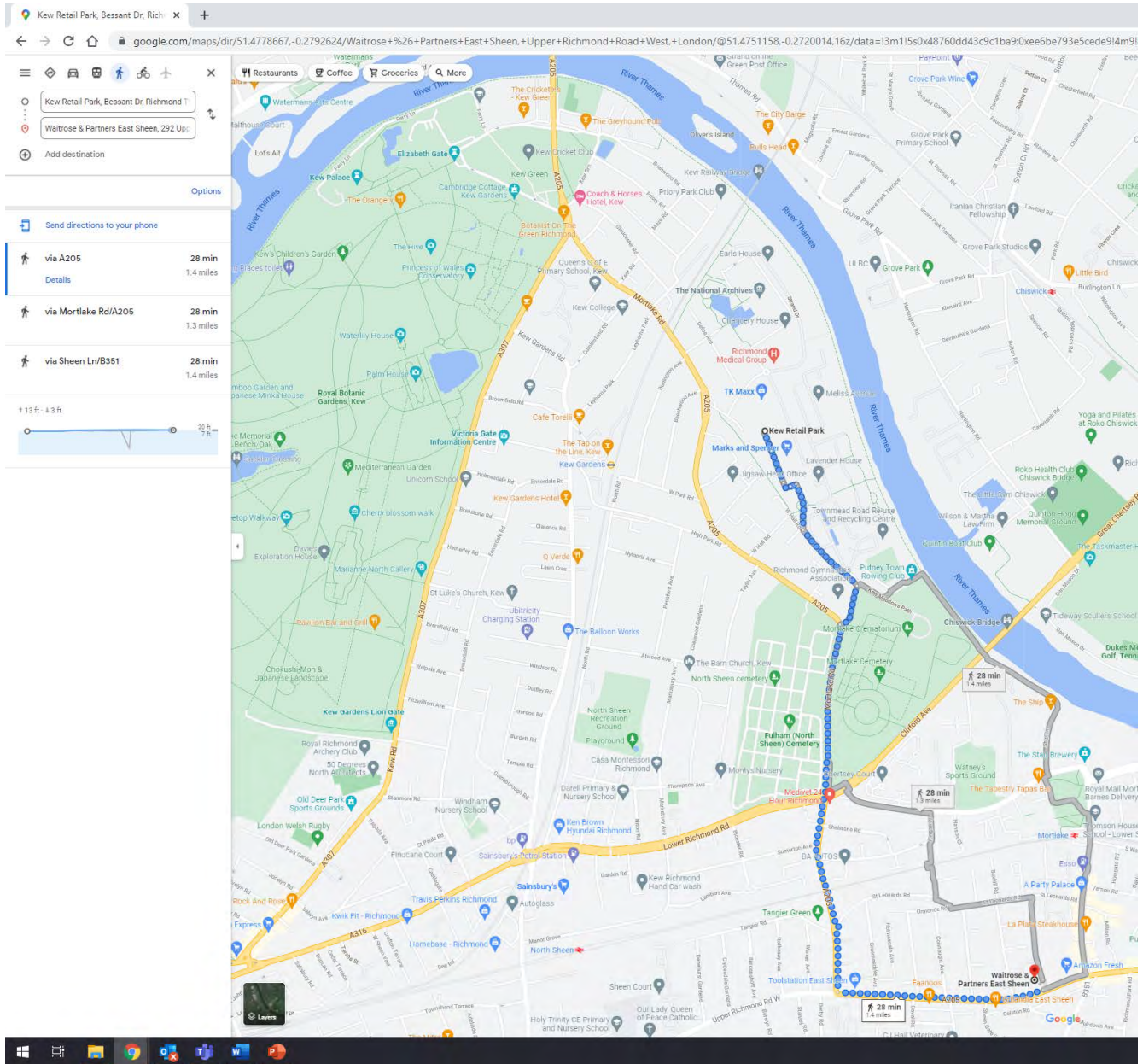
Source: Google (January 2022)

Sainsbury's, Lower Richmond Road, TW9 4LT



Source: Google (January 2022)

Waitrose, Upper Richmond Road, East Sheen, SW14 7JG



Source: Google (January 2022)

Appendix B

Site Ownership Plan



Notes

1. Consultation with the Planning Authority is required for all proposed changes to the site plan.

2. The site plan is a draft and should not be used for any other purpose without the written consent of the Planning Authority.

3. The site plan is a draft and should not be used for any other purpose without the written consent of the Planning Authority.

4. The site plan is a draft and should not be used for any other purpose without the written consent of the Planning Authority.

No.	Date	Description	Drawn	Check
1		Issue for comment		

DRAFT



Project
The Kew Quarter

Document
Ownership Plan

Scale: 1:500	Site Ref: 01508/A
Drawing No: SK_025	Revision:
Issue No:	



Implementing the Thames Estuary 2100 Plan in the London Borough of Richmond upon Thames

October 2020

This document sets out the London Borough of Richmond’s role in delivering the Thames Estuary 2100 Plan (the Plan), as well as key messages for you to use when engaging on the Plan with partners and stakeholders. It is aimed at a variety of different teams likely to be involved in delivery. These include those involved in strategic planning, development management, regeneration, infrastructure delivery, flood risk management, and emergency planning.

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What is the Thames Estuary 2100 Plan?

The Plan sets out how the Environment Agency and our partners can work together to manage tidal flood risk in the Thames Estuary, adapt to a changing climate and plan for the future of our riverside, today and into the next century.

It aims to manage tidal flood risk through a series of upgrades to the flood defence system, including the Thames Barrier and other barriers, as well as the walls, gates, and embankments along the Estuary. In some places, fixed flood defences (like flood walls and embankments) will need raising by 1 metre. As the Plan was designed to be adaptive, the timing and nature of these upgrades are dependent on climate change projections and the rate of sea level rise.

The Plan has 3 phases of activity:

- Until 2035 – maintain and improve current flood defences, safeguard areas of land required for future improvements to flood defence, influence local plans and strategies, and monitor how the estuary and the climate is changing
- 2035-2050 – raise flood walls and embankments, improve smaller barriers whilst reshaping the riverside environment through development, decide around 2040 on the end of the century option for the future of the Thames Barrier

customer service line
03708 506 506

incident hotline
0800 80 70 60

floodline
03459 88 11 88



- 2050-2100 – implement the option for the future of the Thames Barrier, and adapt other flood defences as required to work alongside this to protect the estuary.



What does the Plan mean for Richmond?

Key messages

- Richmond is affected by both tidal and fluvial flooding and this interplay is complex. The tidal flood defences provide protection against the highest water levels that are permitted through the Thames Barrier. Fluvial flooding from the Thames also occurs on the Richmond frontage and the Thames Barrier is currently used to lower water levels during fluvial floods. There are also fluvial flooding problems on the River Crane and Beverley Brook that are exacerbated by high tidal water levels in the Thames.
- The Plan's requirements for Richmond include future raising of all tidal flood defences, together with an ongoing programme of inspection, maintenance, repair and replacement of defences as required. Corridors of land alongside the existing defences should be safeguarded to provide space for these works. You have a responsibility to maintain and raise any defences you own, as well as ensuring that proposed works to third party defences align with the requirements of the Plan through your role as a local planning authority.
- Eel Pie Island at Twickenham is accessed via a footbridge and contains residential properties and boatyards. The defence crest levels are lower than the main tidal defences and flooding can occur during fluvial events. The island benefits from the current practice of closing the Thames Barrier during fluvial flood events to reduce flood levels in west London
- The future raising requirements of the flood defence levels in Richmond are as follows:
 - **Raising of all defences along the Thames by up to 0.5m by 2065, and by an additional 0.5m by 2100;**
 - **Raising of defences on Eel Pie Island by up to 0.8m by 2065, and by an additional 0.5m by 2100.**

This allows for projected increases in sea level to 2135.

- The tidal flood defences in Richmond are 'hard defences', mostly masonry structures. Most of the hard defences could be raised within the existing defence footprint (or with only a small increase in width) but the structures would be tall, unattractive and would restrict public access and views of the estuary. However, if future raising is planned for and integrated into your future plans for the riverside, there are instead significant opportunities to improve the riverside when defences are raised, repaired or replaced, with the potential to improve public spaces, access, and to create new habitats. This is referred to in the Plan as **the riverside strategy approach**.
- Thames Estuary Asset Management 2100 (TEAM2100) is a programme of works to investigate flood defences and identify priority works needed to repair existing defences to maintain the current standard of protection across the estuary. Where priority works are identified, we will work with riparian owners who will be required to carry out the necessary works or to contribute to them in line with their riparian responsibilities and the Metropolitan Flood Act. The TEAM2100 programme is one of the first key steps to delivering the Plan; these assessments will enable us to develop a prioritised programme of future asset management works. A proportion of the programme is funded by central government; however, we are required to secure contributions from those who benefit from protection in the estuary. We can share further information on specific projects and funding gaps, as well as seek support in finding contributions as the programme develops.
- We are now working on the first full review and update of the Plan since it was published in 2012. This is an opportunity to learn from the first 10 years of implementation and make changes to our ways of working; making it easier for everyone to access, understand and use the Plan. The review will use the latest evidence and data, expertise and collective knowledge, to revise the recommendations in the current Plan; ensuring we can continue to protect the Thames Estuary from rising sea levels, achieve the wider benefits that come with reimagining our riversides to accommodate upgraded defences, achieve the best value for money and remain at the forefront of climate adaptation. As a council, you have a key role to play in this Review. This is your opportunity to influence how we collectively deliver the Plan and your role within that.
- We encourage you to act as an advocate of the Plan so that it is understood throughout your council as well as with your external partners, and to ensure Thames Estuary 2100 Plan is reflected in key documents and plans.

What is the flood risk policy for Richmond?

customer service line
03708 506 506

incident hotline
0800 80 70 60

floodline
03459 88 11 88



The Plan divides the estuary into 23 policy units which are each assigned a flood risk management policy depending on the acceptable level of flood risk based upon what is being defended. Policies dictate the programme of flood defence maintenance and improvement activities.

The Barnes & Kew policy unit has a Policy P5, to **take further action to reduce flood risk beyond that required to keep pace with climate change**. This means that the standard of protection against tidal flooding will be increased in the future. This will be achieved by improvements to the main tidal flood barrier on the Thames (currently the Thames Barrier at Charlton) together with improvements to the other flood defences e.g. river walls.

As Richmond is affected by both tidal and fluvial flooding the Richmond and Twickenham policy units have a P3 (fluvial) and P5 (tidal) policy. Twickenham and Richmond policy units must have a P5 Policy for tidal flooding because the Thames Estuary 2100 Plan will allow higher water levels upriver of the Thames Barrier in the future. This will be on a regular basis. To offset this the flood defences in Twickenham and Richmond must be raised in the same way as other defences upriver of the Barrier to prevent regular tidal flooding of the riverside. The P3 policy is exclusively for fluvial flooding, **to continue with existing or alternative actions to manage flood risk accepting that the likelihood of flooding will increase because of climate change**. This is because how we use the Thames Barrier to manage flooding may change, this is to prolong the life of the Thames Barrier to protect from tidal flood risk.

Key facts



... **at risk of flooding** from rivers and the sea Richmond. This is under the present day extreme flood event without defences in place. With the impacts of climate change, this risk is expected to increase.

The **Twickenham policy unit** in Richmond includes residential areas, parks and gardens, and contains an extensive flood risk area between the River Thames and the River Crane. Our recommended works within this policy unit up to 2050 will provide the following benefits (which includes benefits outside of your borough's boundaries):



The **Richmond policy unit** consists of a relatively narrow floodplain along the Thames, much of which is occupied by parks and gardens. The amount of property at risk is small but there are some historic and important sites including Ham House and part of Kew Gardens. Our recommended works within this policy unit up to 2050 will provide the following benefits (which includes benefits outside of your borough's boundaries):





The **Barnes & Kew policy unit** contains residential areas and some important open areas including Kew Gardens and the Barnes Wetland Centre. Our recommended works within this policy unit up to 2050 will provide the following benefits (which includes benefits outside of your borough's boundaries):



The tidal flood defences in Richmond include the following:

- Fixed defences on the Thames and the lower reach of the River Crane.
- Smaller fixed defences on Eel Pie Island.
- The Crane gates that prevent high water levels in the Thames entering the River Crane.
- Drainage outfalls with tidal flap gates to prevent flow from the Thames into the drainage systems. These include the Beverley Brook outfall and the two diversion culverts referred to below.
- Richmond and Teddington locks. Whilst not tidal defence structures, these are the river control structures on the Thames in west London.

The tidal flood defences provide protection against the highest water levels that are permitted through the Thames Barrier. Fluvial flooding from the Thames also occurs on the Richmond frontage and the Thames Barrier is currently used to lower water levels during fluvial floods. There are also fluvial flooding problems on the River Crane and Beverley Brook that are exacerbated by high tidal water levels in the Thames. There are two diversion culverts on Beverley Brook which discharge fluvial flows but these are also affected by tide lock from high tidal water levels. There are also a number of drainage outfalls with tidal flap gates to prevent flow from the Thames into the drainage systems. The drainage outfalls into the Thames may require improvement as the sea level rises and storm rainfall increases, because drainage of the floodplains will become more difficult. The [map of land use requirements \(page 6\)](#) shows the Plan's requirements for these defences.



Roles and responsibilities

Environment Agency

Developed the Plan in partnership with key stakeholders, now act as custodians and work with partners to ensure delivery.

Develop and curate an annual Implementation Plan which outlines the actions that need to be taken to successfully implement the Plan.

Regulate permits for works to flood defences, inspecting defences, and work with councils and developers to ensure a statutory advisor in the planning process to ensure that developments align with the Plan's requirements.

As TEAM2100 Project team delivering the first 10 years of tidal flood defence asset management under the Thames Estuary 2100 Plan.

Work in partnership with beneficiaries in the Estuary to secure funding and deliver greater value for public money through innovation, collaboration and joint planning. Consult relevant officers at Richmond Council as projects progress within its boundary.

Thames Estuary 2100 Plan



Riparian Owners

If you own land immediately adjacent to a flood defence, you are considered the asset owner.

Riparian owners are responsible for maintenance and repair of their asset, in agreement with the Environment Agency.

Riparian owners must ask permission before they: change, remove or build any flood defence on your land, or do any work within 16 metres of a tidal flood defence. They should also establish if works may also require planning permission.

London Borough of Richmond upon Thames

As a Local Planning Authority and Lead Local Flood Authority, you have a role in delivering the Plan's recommendations.

Take local ownership of the Plan by helping to develop and implement the Plan. Ensure recognition and understanding at all levels of the council.

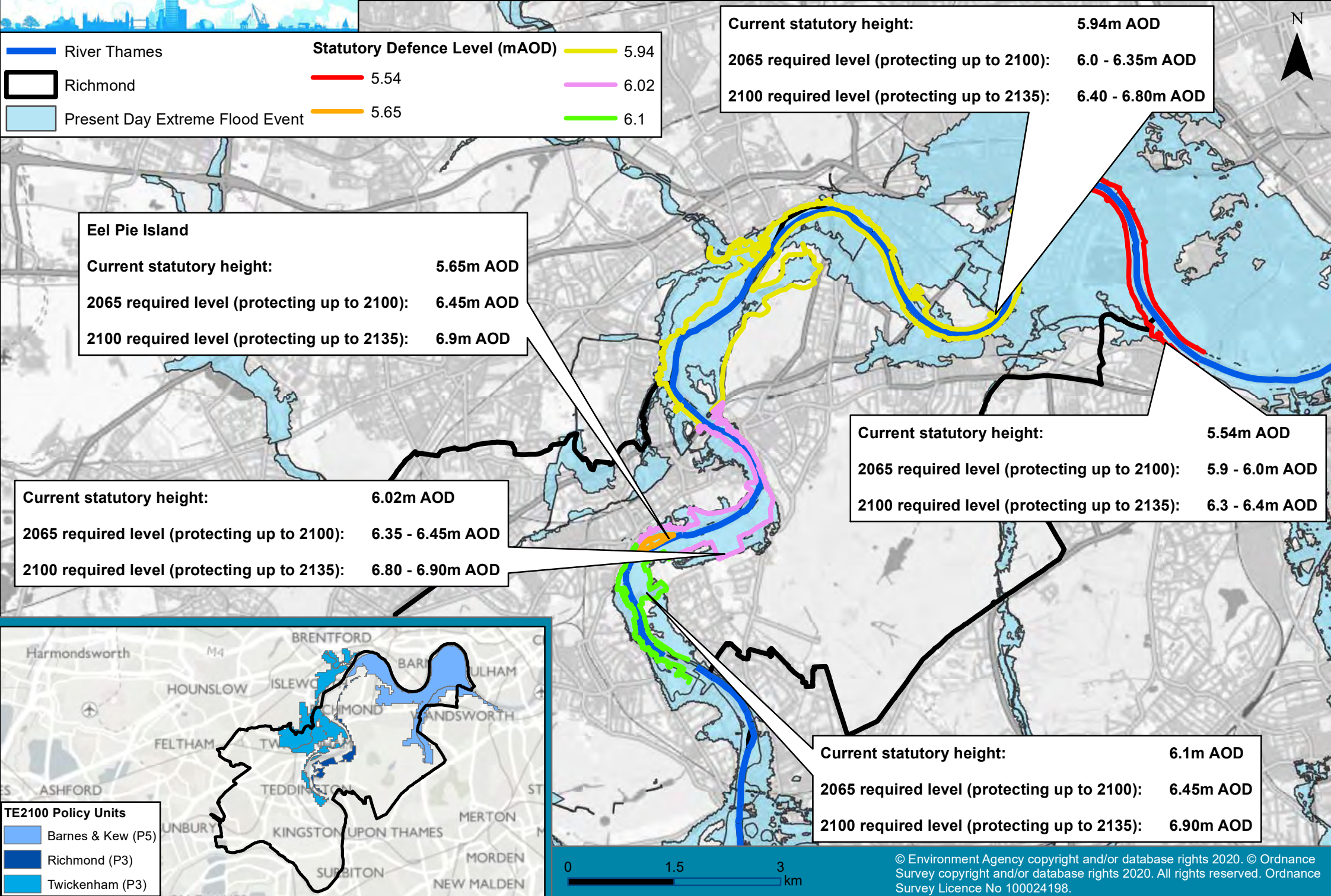
Support flood defence projects through raising of external contributions, ensure stakeholder buy-in and updating strategic planning documents.

customer service line
03708 506 506

incident hotline
0800 80 70 60

floodline
03459 88 11 88

Richmond - Thames Estuary 2100 Defence Requirements





Your role in delivering the Plan

As a Local Planning Authority

Your role as a Local Planning Authority is crucial in delivering the Plan's recommendations. The planning system provides significant opportunities to implement the necessary improvements to the tidal flood defences, such as raising to the required future heights and ensuring that the ability to deliver flood risk management requirements are not compromised through unsuitable development proposals. As the decision maker, you need to ensure individual planning application decisions and strategic planning documents align with the Plan's requirements in your borough. We will support you to do this in our role as a statutory consultee in the planning process.

Planning policy and development proposals

We are a statutory consultee in the planning process for any developments in a flood zone or within close proximity to a main river defence. Through the planning system we require developers to demonstrate how flood defences will be able to be raised to Thames Estuary 2100 heights by the current and future deadlines set out in the Plan. They can do this by submitting plans and cross-sections which demonstrate how the defence can be raised to the required levels in the future, as well as maintained and repaired. This should include the provision of adequate space to do so.

However, developers may instead wish to raise the defences to the set heights earlier than those deadlines, for example during the initial redevelopment of the site. This can have many advantages for the development including reduced overall costs, less disruption to the site in future, and making the most of the space available through integration of the defences into the wider design of the site. If developers wish to pursue this option, we will be supportive of this approach provided defences are able to adapt to any other potential changes in the future.

To support this, and to ensure development proposals implement the wider recommendations of the Plan, we advise that your strategic plans and development management policies should include specific requirements for development along the tidal riverside to:

- Maintain, enhance or replace flood defence walls, banks and flood control structures to provide adequate protection for the lifetime of the development, including ensuring adequate provision of space for this in regeneration or local plan allocation areas;
- Demonstrate how the tidal flood defences can be raised to the required Thames Estuary 2100 levels in the future through submission of plans and cross-sections of the proposed raising. Where opportunities exist, this could be achieved through developers raising defences now to the required heights, as long as these are able to be adapted if required in future;
- Demonstrate the provision of improved access to existing defences, or where opportunities exist to realign or set back defences;
- Provide associated landscape, amenity and habitat improvements alongside defence improvements where appropriate, in line with the riverside strategy approach (see *Taking a riverside strategy approach* section);
- Safeguard land for future defence raising (see *Land requirements* section);
- Secure financial contributions from partners in order to enable flood defence works.

Land requirements

Land is required for continued maintenance of the flood defences, and so corridors of land alongside the existing defence lines should be safeguarded for this reason. This should include sufficient space for vehicle and plant access for the ongoing maintenance and repair of the defences.



Additionally, when the defences come to be raised, space will also be needed for these defence engineering works. We suggest that the width of land that should be safeguarded for future flood risk management interventions on the Thames could be of the order of 16 metres. More space may be required especially if wider environmental and placemaking improvements are to be achieved. However, this will depend on the characteristics of the site, the defence type and any proposed riverside improvements, and should be discussed and agreed with us on a site by site basis.

Taking the riverside strategy approach

There are significant opportunities to enhance your riverside environment both where defences need to be raised, but also where they are to be repaired or replaced. Whilst just raising the defences on the existing footprint (which in itself could prove both difficult and significantly more expensive) would achieve the flood risk management objectives of the Plan, it would not provide any wider landscape or environmental benefits, and could introduce structures that would be tall, unattractive and would restrict public access and views of the estuary. However, if planned for, there is the potential to achieve significant public realm and environmental improvements when undertaking flood defence work, including improved public spaces by the riverside, improved access to the river and an enhanced Thames Path, and the potential creation of new intertidal habitats.

The riverside strategy approach was introduced in the Plan as a way for those involved in shaping the future of the Thames riverside, including local planning authorities, to ensure the required future changes to the riverside take place in a planned and integrated way. This will maximise the potential environmental, social, cultural and economic benefits, and avoid raising the flood defences without considering the impact on the environment and communities which sit behind them. If implemented, the approach will create better access to the river and enhance the riverside environment, all whilst enabling the tidal flood defences to continue to provide protection from the increasing risk of flooding as a result of climate change.

There are a number of opportunities to implement the riverside strategy approach. This could be through developing a new standalone document, or via a combination of local plan policies, site allocations, supplementary planning documents, masterplans, planning performance agreements, marine plans, and green space strategies. For London boroughs, Opportunity Area Planning Frameworks (Mayoral supplementary planning guidance to the London Plan) can also play a part. Where a large amount of growth or change is expected along a stretch of the riverside, it is likely to be more appropriate to develop a standalone strategy or masterplan to fully integrate the changes to the defences with the opportunities for wider public realm benefits, and to set out an appropriate plan for the timing and phasing of interventions. In other areas, it may be sufficient to embed the aims and requirements within local plan policies and supplementary planning documents. However you achieve this, the riverside strategy approach should work in conjunction with any relevant strategies and be developed in collaboration with local stakeholders.

We have produced a separate guidance document which sets out our aspirations for the riverside strategy approach and what this means for you as our partner. See [Further sources of information](#) section.

Funding

The original Thames Estuary 2100 Plan estimated that it would cost £3.3 billion to maintain and improve the current flood defence system until 2050, and a further £6-8 billion to improve and upgrade flood defences during the second half of the century. Almost 10 years in, we have a better understanding of the current defence system and climate projections; accounting for inflation, and the fact that flood defence assets are deteriorating more quickly due to sea level rise, we expect that these cost estimates will have increased. Through our 10-Year Review of the Plan, we will develop a better understanding of the costs and benefits of its delivery. This will include producing a long-term funding strategy which will set out options and recommendations for funding defence works. We will need to work with partners and experts to understand all of the options available for funding and the best approach to securing the funding needed.



There is a perception amongst developers and some infrastructure providers that someone else will provide and fund resilience to climate change. However, government Partnership Funding rules state we have to obtain contributions from those benefitting from flood schemes to top up flood defence grant in aid, so the assumption that full funding comes from government has to change.

To support this as a Local Planning Authority, you could include the defence improvement works in your Community Infrastructure Levy (CIL) Regulation 123 lists, with funding through CIL used to contribute to the costs of flood defence works. Similarly, Section 106 should be used to secure funding for works where possible. You should consider making applications for Housing Infrastructure Funds to support viability of developments where flood defence infrastructure is required.

As a Lead Local Flood Authority

Your role as a Lead Local Flood Authority plays an important part in delivering the recommendations of the Plan. Where delivering your local flood risk management works, there should be an alignment with the required upgrades as set out in the Plan, as well as with the [National Flood and Coastal Erosion Risk Management Strategy for England](#), and any other relevant strategies.

In particular, there should be consideration of the interaction between tidal flood risk and the other sources of flooding, e.g. surface water. It is therefore necessary for you to have a strong awareness of what the Thames Estuary 2100 requirements are in your local area, including any improvements that will likely be required to drainage outfalls as sea levels rise and storm rainfall increases

If you require any support for your flood risk management schemes, please liaise with your local Environment Agency contact and Regional Flood and Coastal Committee Advisor.

Environment Agency contacts

Contact for	Contact details
Local Plan and development management enquiries	KSLPlanning@environment-agency.gov.uk
General Thames Estuary 2100 enquiries; including Riverside Strategies 10-Year Review, and TEAM2100	ThamesEstuary2100@environment-agency.gov.uk

Further sources of information

- The Thames Estuary 2100 Plan can be found via <https://www.gov.uk/government/publications/thames-estuary-2100-te2100>.
- We have a Thames Estuary 2100 Plan SharePoint site, accessed via <https://defra.sharepoint.com/teams/Team598/TE2100%20%20External%20Partner%20Site/Forms/AllItems.aspx>. You will need to request access the first time you open the link. Along with other helpful documents, including a copy of this briefing, it contains the guidance note on the riverside strategy approach.

customer service line
03708 506 506

incident hotline
0800 80 70 60

floodline
03459 88 11 88



- Flood risk activity permit information- Under the terms of the Environmental Permitting Regulations, a *Flood Risk Activity Permit* is required from the Environment Agency for any proposed works or structures, in, under, over or within 16 metres of a tidal flood defence asset, and in, under, over, or within 8 metres of the top of the bank of a watercourse designated a 'main river'. Details of lower risk activities that may be excluded or exempt from the Permitting Regulations can be found on the [gov.uk](https://www.gov.uk) website. A permit is separate to and in addition to any planning permission granted. The consent form and accompanying guidance can be found at: <https://www.gov.uk/guidance/flood-risk-activities-environmental-permits>
- Owning a watercourse- This is an Environment Agency guide that explains responsibilities and rules to follow for watercourses on or near your property, and permissions needed to do work around them. It can be found at: <https://www.gov.uk/government/publications/riverside-ownership-rights-and-responsibilities>



Thames Estuary 2100: the riverside strategy approach

June 2019

The [Thames Estuary 2100 Plan](#) (the Plan) sets out how we (the Environment Agency) and our partners can work together to manage tidal flood risk in the Thames Estuary, from now until the end of the century. It is an adaptive plan, ensuring current standards of flood protection provided by the existing tidal defence system are maintained or improved taking into account the effects of climate change e.g. sea level rise. In order to do this, existing flood defences along the Thames and its tributaries will need to be maintained and improved, and in many places raised in height by up to 1 metre.

This document is aimed at those involved in planning for the future of the Thames riverside. It sets out our aspiration for the riverside strategy approach and what this means for you as our partner.

What is the riverside strategy approach?

There is a great opportunity to enhance the riverside environment both where defences need to be raised, but also where they are to be repaired or replaced. Whilst just raising the defences on the existing footprint (which in itself could prove both difficult and significantly more expensive) would achieve the flood risk management objectives of the Plan, it would not provide any wider landscape or environmental benefits, and could introduce structures that would be tall, unattractive and would restrict public access and views of the estuary. However, if planned for, there is the potential to achieve significant improvements when undertaking flood defence work, including improved public spaces, access to the river and the Thames Path, and the creation of new habitats.

The riverside strategy approach was introduced in the Plan as a way for those involved in shaping the future of the Thames riverside, including local planning authorities, to ensure the required future changes to the riverside take place in a planned and integrated way. This will maximise the potential environmental, social, cultural and economic benefits, and avoid raising the flood defences without considering the impact on environment and communities which sit behind them.

If implemented, the approach will create better access to the river and enhance the riverside environment, all whilst enabling the tidal flood defences to continue to provide protection from the increasing risk of flooding as a result of climate change.

What do we want to achieve?

We would like a riverside that is accessible to everyone, enhances the unique and varied environment of the Thames and protects from flood risk, promoting sustainable growth throughout the estuary and supporting the ambitions of the Government's 25-year Environment Strategy.

But we can't deliver this alone. We envisage our partners creating visions or strategies for their tidal riversides which outline how the improvements to the flood defence works will be incorporated into the wider riverside environment to ensure the opportunities provided by the Thames Estuary 2100 Plan are seized in full.

To be successful, this needs to be led by organisations who are shaping the riverside. This includes local planning authorities, developers, and other organisations with a planning remit, such as the Greater London Authority.



What are the aspirations of the riverside strategy approach?

Flood defences are raised to the recommended height set out in the Plan, achieving our recommended flood risk policies

Development is setback from the river, providing space for maintenance, future defence raising, people, and the environment

Land needed now or in the future for flood defences is identified and available when required

The riverside best serves the needs of its communities and the environment, providing integrated environmental, social, and economic benefits

Development is not negatively impacted by flood defences (now and as a result of future raising) through holistic and innovative design

Intertidal habitat across the Estuary is created where appropriate

Local communities and river users have quality and uninterrupted access to the riverside, with a Thames Path running continuously along the Estuary

The riverside provides increased natural capital and supports local authority growth ambitions to be delivered sustainably

And the risks of failing to plan for Thames Estuary 2100?

Flood defences raised with only the minimum functional requirement in mind, without integrating design with the surrounding area

Public access and views of the Thames are restricted, disconnecting people from enjoying a relationship with the river

Defence raising and upgrades are at a much greater cost to public spending due to challenges arising from a lack of planning for future requirements

Flood defence structures become tall and unattractive when raised

Development behind defences suffer from reduced views and land values due to higher defences cutting them off from the river

Opportunities are lost to create a better environment for river wildlife

Works become significantly more difficult as land hasn't been safeguarded for maintenance and the construction/footprint of upgraded defences

Opportunities are lost to regenerate and revitalise the riverside, with chances missed to fund defence works as part of wider developments



How can you deliver this?

There are a number of opportunities to implement the riverside strategy approach. This could be through developing a new standalone document, or via a combination of local plan policies, site allocations, supplementary planning documents, masterplans, planning performance agreements, marine plans, and green space strategies. For London boroughs, Opportunity Area Planning Frameworks (Mayoral supplementary planning guidance to the London Plan) can also play a part.

Where a large amount of growth or change is expected along a stretch of the riverside, it is likely to be more appropriate to develop a standalone strategy or masterplan to fully integrate the changes to the defences with the opportunities for wider public realm benefits, and to set out an appropriate plan for the timing and phasing of interventions. In other areas, it may be sufficient to embed the aims and requirements within local plan policies and supplementary planning documents.

However you achieve this, the riverside strategy approach should work in conjunction with any relevant strategies and be developed in collaboration with local stakeholders.

What is the Environment Agency's role?

We are committed to supporting our partners to deliver the riverside strategy approach. We are able to help you develop, promote and implement the approach, and we will commit our time and effort to do so.

More specifically, we can:

- Advise where defences will need to be raised in the future, by what time and to what height.
- Advise on where land is required for our inspection and maintenance of flood defences, including flood walls and flood gates.
- Advise on where land is required for other flood risk management purposes such as a future Thames Barrier or to provide intertidal habitat creation for biodiversity and flood management benefits.
- Advise on the appropriateness of plans and designs.
- Advise where works to defences are likely to take place under the Thames Estuary Asset Management 2100 (TEAM2100) current programme of works.
- Provide a facilitation role to support the development of strategies and implementation of the approach (i.e. running of workshops to enable partners start thinking about this approach).
- Help to co-ordinate conversations between councils where their riverside visions meet.
- Support opportunities for partnership working to develop shared visions for the riverside with stakeholders such as; the Greater London Authority, local planning authorities and landowners.
- Share successes from elsewhere in the Estuary.

What are the next steps?

To discuss further, please contact the Environment Agency's Thames Estuary 2100 team at ThamesEstuary2100@environment-agency.gov.uk.



Appendix 1 – Food in the School Fringe Tends to be Purchased in Non-Hot Food Takeaway Properties

1. Research by Professor Jack Winkler (London Metropolitan University) into the 'school fringe' – found just 3/10 purchases by students in a 400m school fringe were made in A5 properties.⁷
2. 70% of purchases in the school fringe were made in non-fast food outlets, and the same research concluded 'the most popular shop near Urban was the supermarket, with more visits than all takeaways put together'.
3. Professor Winkler's findings are not an isolated case. A report by Public Health England and the LGA states that fast food school proximity restrictions do 'not address sweets and other high-calorie food that children can buy in shops near schools.'⁸
4. Research by Brighton and Hove found that 'Newsagents were the most popular premises [in the school fringe], with more pupils visiting newsagents than any A5 premises'.⁹
5. Likewise, research for the Food Standards Agency on purchasing habits in Scotland found that 'Supermarkets were the place that children reported they most frequently bought food or drinks from at lunchtime'.¹⁰
6. Indeed, there are several more researchers who have found no evidence to support the hypothesis that less exposure to fast food, or better access to supermarkets are related to higher diet quality or lower BMI in children. ¹¹¹²¹³

⁷ The School Fringe: What Pupils Buy and Eat From Shops Surrounding Secondary Schools, July 2008, Sarah Sinclair and Professor J T Winkler, Nutrition Policy Unit of London Metropolitan University

⁸ Public Health England & LGA, Healthy people, healthy places briefing: Obesity and the environment: regulating the growth of fast food outlets, page 5, November 2013

⁹ Brighton & Hove City Council & NHS Sussex, Hot-food takeaways near schools; An impact study on takeaways near secondary schools in Brighton and Hove, page 28, September 2011

¹⁰ Jennie Macdiarmid et al. Food Standards Agency. Survey of Diet Among Children in Scotland (2010) - http://www.esds.ac.uk/doc/7200/mrdoc/pdf/7200_final_report_part_2.pdf

¹¹ Forsyth, A., et al., Do adolescents who live or go to school near fast-food restaurants eat more frequently from fast-food restaurants? Health and Place,, 2012. 18(6): p. 1261-9.

¹² An, R. and R. Sturm, School and residential neighborhood food environment and diet among California youth. American Journal of Preventative Medicine, 2012. 42(2): p. 129-35.

¹³ Timperio, A.F., et al., Children's takeaway and fast-food intakes: associations with the neighbourhood food environment. Public Health Nutrition,, 2009. 12(10): p. 1960-4.

Appendix 2 – Food Purchases made on School Journeys

Only a limited number of journeys to and from school involve a purchase at a food outlet.

1. This has been confirmed in research by the Children’s Food Trust, which found that only 8% of all journeys to and from school included a purchasing visit to a food outlet.¹⁴

	n	Number of journeys to school	Number of journeys from school	Total number of journeys	Percentage (%) of all journeys
Journeys including a visit to a food outlet		86	87	173	10
Journeys including a purchase from a food outlet		8	6	14	8

2. Of the food purchases made on school journeys, confectionary was the most popular item sold – which McDonald’s does not offer on its menu.

3. Likewise, research by Ashelsha Datar concluded that children ‘may not purchase significant amounts of junk food in school’ – partly due to ‘fewer discretionary resources to purchase them’.¹⁵

4. Indeed, even where purchases were made, ‘children may not change their overall consumption of junk food because junk food purchased in school simply substitutes for junk food brought from home.’

5. Similarly, research by Fleischhacker highlighted the need for future school-based studies to ‘gather information on whether or not the students attending the studied schools actually eat at the restaurants near their schools.’¹⁶

6. This was also highlighted in the systematic review by Oxford University, which states ‘future work should also incorporate a child’s usual mode of travel to and from school into decisions about appropriate buffer distances.’ The review added that age should also be taken into consideration, as this can impact on travel time and the availability of pocket change.¹⁷

¹⁴ Children’s Food Trust – November 2011, page 1 http://www.childrensfoodtrust.org.uk/assets/research-reports/journey_to_school_final_findings.pdf

¹⁵ Ashelsha Datar & Nancy Nicosia, Junk Food in Schools and Childhood Obesity, page 12, May 2013

¹⁶ S Fleischhacker et al. A systematic review of fast food access studies, page 9, 17th December 2009

¹⁷ J Williams, P Scarborough, A Matthews, G Cowburn, C Foster, N Roberts and M Rayner, Nuffield Department of Population Health, University of Oxford, page 13-14, 11th December 2013. A systematic review of the influence of the retail food environment around schools on obesity-related outcomes.

4th January 2022

Simon McIntosh
BMO Real Estate Partners

By e-mail: smcintosh@bmorep.com

Dear Simon,

RE: Onslow Hall, Richmond – Marketing update



brayfoxsmith.com

2nd Floor
Prince Frederick House
35-39 Maddox Street
London W1S 2PP

Tel: 020 7629 5456
Fax: 020 7491 4788

I refer to the above property and, as requested set out below a commentary on the Richmond office market as well as the building specifically.

Supply

Richmond is a mature, established market with stock totalling approximately 980,000 sq ft. Supply levels currently are above the long-term average with a number of refurbished grade A quality offices coming on line currently.

Key current availability:

Building	Landlord / Developer	Size	Quoting Rent	Timing	Notes
Sovereign Gate, Kew Road	Watkin Jones	3,884 – 24,377	£52.50	Current	Newly refurbished former police station.
Holbrooke Studios, Hill Rise	CBRE Global Investors	9,819	£53.50	Current	Newly refurbished building on edge of town.
Evergreen Studios	Sheen Lane	3,294 – 13,960	£55.00	Current	Refurbished building, LG to 3 rd . Ground now let.
Greyfriars Studios	Sheen Lane	4,352 – 8,713	£55.00	Current	Refurbished space above retail opposite Station.
Ambassador House	Colliers Global Investors	6,492 – 23,288	£48.50	Current	3x refurbished floors
		Total – 80,157			

I would suggest that of these currently available options they are not comparable with Onslow Hall. They are all purpose built office buildings with raised floors and air conditioning.

Supply pipeline

Richmond is currently facing a large influx of available office space which is going to result in stock levels in the town far higher than they have been in recent history. This will likely create challenging marketing conditions moving forwards.

Building	Landlord / Developer	Size	Quoting Rent	Timing	Notes
Frame Works	BBRE	2,023 – 19,970	NQ, likely late-£50's	Jan 22	Planning received for back to frame refurb. On site to deliver Jan 2022.
Eton House	Moorevale	45,000	TBC	2023	Extend and refurbishment
Palm Court, Richmond Riverside	OSIM	C17,000	NQ	TBC / likely late 2022 – early 2023	Will be refurbished once Unilever lease expires. Will be let to a single tenant.
19-22 The Quadrant	Kier	2,077 – 14,553	NQ	TBC	Refurbished / extended office space above Lloyds Bank. Planning received, no proposed commencement of works.
80 George Street	Canadian & Portland	42,000	NQ	TBC	Redevelopment of former Department Store. Planning received. Will not spec.

Of the above, only Palm Court is a self-contained, period style building Like Onslow Hall. The rest of the buildings are purpose built modern offices.

Demand

The longer-term average take-up is c60,000 sq ft per annum however the last 5-year take-up average is low at 38,241 sq ft. There has historically been a flight to quality and that remains as important, if not more at present – with the best buildings securing the tenants.

I've appended a current schedule of enquiries of 2-12,000 sq ft for Richmond and although not exhaustive, provides a flavour.

Below is a table highlighting recent transactions:

Date	Property (Floor)	Tenant	Size	Term (break)	Rent (psf)	Notes	Condition
Sep 21	Holbrooke Studios (1 st)	Infinium Logistics	4,331	10 years (5)	£50.00	Grade A refurbished, secondary location	Grade A refurbished
Aug 21	Evergreen Studios (G)	Spoke London	3,363	5 years (3)	£55.00	Grade A refurbished	Grade A refurbished
Dec 20	25 Kew Foot Road (Entire)	Secretary of State	7,632	15 years (10)	£49.50	New build, Grade A but secondary location. Pre-let agreed in 2019.	New Grade A

Dec 20	1 Eton Street (2 nd)	Ecover	11,034	2 years	£45.00	Short-term letting on unrefurbished space.	Grade A unrefurbished
Mar 20	Heron House (Entire)	RM Sothebys	3,133	10 years (3 and 5)	£59.00	Full refurbishment of Grade II listed building overlooking the River as part of Richmond Riverside development	Sympathetic period refurbishment

The Property

Focusing on Onslow Hall, I have been marketing office space in the building since October 2015 with some suites in the building having been available and actively marketed now for coming up to 3 years. During this period, to try and enhance the letting prospects, you funded significant fit out costs in order to be able to offer a fully fitted office suite at Onslow Hall. We are seeing more of this as Landlords try to secure new tenants for their vacant office space.

As I mentioned above it is important to remind ourselves that BMO have invested in Onslow Hall over the 6 or so years I have been working on the building and as a result have made it much more presentable to the market. As a recap significant cap ex works have been carried out to the externals, the internal common parts and offices suites as well as the installation of a new lift. That said it remains a Grade II listed property with all the limitations that brings including a small/ limited reception area, no comfort cooling or air conditioning and no raised floors. It is also important to note that the building is not DDA compliant and has compromised WC facilities which have all added to the challenges in finding tenants for the building. In our experience, the limited number of tenants out there taking space are much more discerning when leasing office space and look for more contemporary and sophisticated accommodation in order to be able to attract and retain their staff. Wellness and ESG matters are more often at the core of their decision making and sadly Onslow doesn't score highly on these matters

Marketing

The marketing of the 2nd floor annex in Onslow Hall commenced in February 2019. Various other suites in the building have become available and have been marketed since.

We have carried out the following initiatives: -

- A 2-page brochure was produced incorporating Photography.
- The property is listed on agency websites
The property is listed on various commercial web sites including Zoopla and Right Move, Estates Gazette Interactive, The Office Agents Society, Prime Location and Estate Agents Clearing House.
- Targeted mail out to local occupiers and business was undertaken
- Letting board attached to the railings outside the building
- As mentioned previously you have funded the fit out the suite to a high quality Category B as a 'show unit' to demonstrate to interested parties the potential environment they could

acquire. The fit out included high quality finishes to the floors, ceilings and kitchen and a range of furniture purchased including desks, chairs, storage, break out area chairs and sofas to show how the offices could work practically for office users.

Interest schedule

Since February 2019 in excess of 20 viewings have been undertaken at the property and a number of proposals have been made.

We have regularly sent the property details to a variety of local occupiers and agents actively looking on behalf of clients. We are aware of ongoing requirements in the area, and we have been able to directly target those acquiring agents.

A schedule of enquiries is attached below. This is not exhaustive but is an indication of the calibre and type of occupier we have tried to attract. The property continues to be actively marketed.

Issues that have been sighted by parties include:

- Poor IT connectivity / lack of flexibility.
- Dated building appearance.
- Low office specification (no air condition or raised floors)
- Poor building access (building not DDA compliant)
- Poor Wellness and ESG credentials

Date	Potential Occupier	Reason for rejection
Feb 19	MJW Wealth	Appearance too grand for brand
March 19	SHB property advisors	Lack of expansion opportunity
March 19	Syslink	No feedback
May 19	Target Capital	Lack of flexibility and compliance issues
June 19	Mesa Financial consultants	Went to serviced offices
Aug 19	Glen cummings	Agent Led – no feedback offered
August 19	Corillian Energy	Office specification- no raised floors or air con
Sept 19	Elementary Brands	Compliance issues
Sept 19	Garner Hancock Solicitors	Location- Isleworth based
Sept 19	Braumlink	
Oct 19	Therme	Dated building image
Oct 19	In2impact	Dated building image
Feb 20	ISAAC	Covid
Dec 2021	Dr Bryany Branford (psychologist)	Poor DDA
Dec 2021	Braumlink	Connectivity/ IT requirements
Jan 2022	Barrister Richard	Limited budget

Jan 2022	Bent Agency	Access to the upper floors to awkward (large archives of books)
Jan 2022	Barrister Richard	Only need space for 4 people

Obviously, this is not a definitive list but clearly shows that there is a strong office market in Richmond, but applicants decided that Onslow Hall was just not suitable.

To reflect market conditions, you have also agreed to reduce your asking terms and to be more flexible on lease structure.

In more recent months Barclays have vacated the building and we now have their space to market in addition to the other suites. The issues that have arisen with trying to let the smaller suites is mirrored across the rest of the building. We have been marketing on the basis of both multitenant or single tenant.

Summary

Having regard to the uncertain state of the office market today, the extensive marketing campaign referred to above, we consider it unlikely that an additional and extended marketing campaign will secure occupiers for these premises.

Perhaps we can convene a meeting to discuss our future working relationship.

Kind regards,

Yours sincerely,

Clare Lane
Director
clarelane@brayfoxsmith.com

Appendix 1. Current Richmond requirements:

Richmond General Requirements Current 9/21

Occupier	Size (sq ft)	Comment
Miramar	2-3,000	Based in serviced offices at present having vacated conventional space last year. Looking to return to conventional, had started making enquiries.
Harvey Nichols	10-15,000	Based on Chiswick High Road but have enquired on Richmond options – need access for deliveries. Lease event 2022.
Velocity Partners	4-5,000	Overflow requirement from their space at the Poppy Factory, Richmond.
Tech21	7,000	TMT occupier, currently working from home
Oryon Imaging	2-4,000	Private diagnostic imaging business. Have been out viewing in Richmond.
Zonin	3,000	Wine business based on Richmond Green. Expanding and looking for new premises. No moving to Battersea
Reed	3-4,000	Recruitment expansion due to contract, were close to agreeing terms on Sovereign Gate – requirement now pushed back by 6 months.
Metis Consulting	3-4,000	Viewing options, due to make a decision imminently on building.
Clorox	4,000	US company with Richmond office, viewed options and will take one of the existing stock options.
Bradford Exchange	4,000	Richmond occupier. Have sold their owner occupied building currently and are looking for a self-contained building with parking to lease.

LGC Limited

Queens Road
Teddington
Middx TW11 0LY

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fax. 020 8943 2767

Drawing Title
LGC Estate

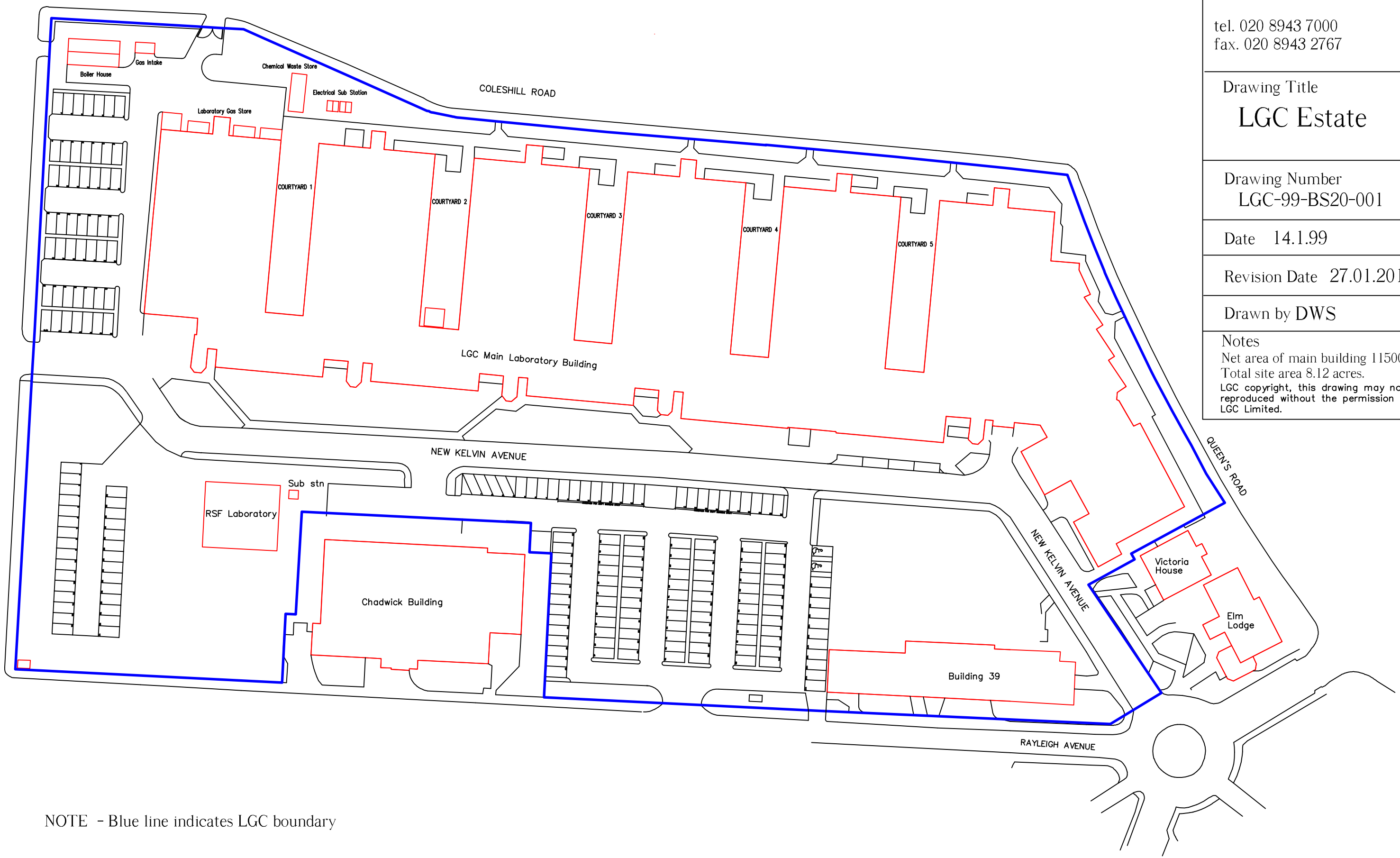
Drawing Number
LGC-99-BS20-001

Date 14.1.99

Revision Date 27.01.2016

Drawn by DWS

Notes
Net area of main building 11500 m2.
Total site area 8.12 acres.
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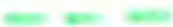



NOTE - Blue line indicates LGC boundary

Land Registry
Official copy of
title plan

Title number TGL394983
Ordnance Survey map reference TQ1269SE
Scale 1:1250
Administrative area Richmond upon Thames



-  My Land
-  Post 1993 ADMIN boundary
-  GB boundary (as 1991)
-  GB extension 1996
-  Reservoir Embankments

Appendix 1 -

Extract from MOL Land Review
(2021) p.115-117

Parcel: Kneller Chase Bridge

Number: 36 **Area (ha):** 18.69 **Place:** Whitton & Heathfield



Legend



Parcel map



View facing north from B361 along the southern boundary, with views of open lawn and housing.



View facing north east from the southern boundary, with views into private gardens from the public highway of The Avenue.



View facing north from B361 along the southern boundary, with views of Kneller Hall grounds including open lawn, trees along boundaries and associated structures in the background.

Boundary Assessment

London Plan Boundary Criterion: ‘Clearly, using physical features that are readily recognisable and likely to be permanent’

The western part of the parcel is bound by development on an Army Barracks. The western part of the parcel to the north is bound by regular backs of residential properties along Amberside Close, tennis courts. The Duke of Cambridge Close bounds the western part of the parcel to the east, Spray Lane bounds the westernmost part of the eastern part of the parcel. The Duke of Northumberland River bounds the parcel to the east with Whitton Dene and regular backs of residential properties bounding the eastern part of the parcel to the north along Queensbridge Park.

Assessment of parcel against London Plan MOL criteria

MOL assessment summary

	Criterion 1	Criterion 2	Criterion 3	Criterion 4	Overall Rating
MOL Parcel score	3	2	2	3	3

* Mostly inaccessible land and therefore assessment based on aerial photography and views from public highways.

London Plan MOL Criterion 1: ‘Contributes to the physical structure of London by being clearly distinguishable from the built-up area’

Built development is notable within the eastern of the parcel which contains Chase Bridge Primary School and hard standing to the east of the Duke of Northumberland River associated with Twickenham Stadium. Elsewhere a small number of minor buildings provide minimal urban influences.

Boundaries are mixed. A continuous tree line along northern and southern boundaries screen adjacent development well. The eastern edge is dominated by hard standing, with no identifiable boundary features and has open views of the directly adjacent Twickenham Stadium, resulting in no sense of openness. To the west the parcel is bound by multiple buildings with little screening, providing localised urbanising influences. Housing central but outside of the parcel (Duke of Cambridge Road), is has a mainly continuous tree line/ woodland on all sides, likely to screen the development on other areas of the parcel.

Open flat lawn with mature trees/ woodland along boundaries defines most of the parcel, with topographic change only at the Duke of Northumberland's River, therefore landscape structure is fairly weak. As built development is generally absent across most of the parcel, which is a fairly large open space contributing to separating the urban areas of Twickenham to the east and Whitton/ Hounslow to the west, it contributes to structure of London and therefore the parcel scores moderate (3) for criterion 1.

London Plan MOL Criterion 2: ‘Includes open-air facilities, especially for leisure, recreation, sport, the arts and cultural activities, which serve either the whole or significant parts of London’

The parcel provides school grounds for recreation and playing fields for local sports. The parcel also provides army barrack grounds and some playing facilities were visible based on views from a public highway. The path along the Duke of Northumberland's River provides the only publicly accessible part of the parcel, offering informal recreation. As the parcel provides local recreational and sport facilities, it scores weak-moderate (2) for criterion 2.

London Plan MOL Criterion 3: ‘Contains features or landscapes (historic, recreational, biodiversity) of either national or metropolitan value’

The river section of the parcel is designated as a SINC (borough) and OSNI including a valued green corridor at the Duke of Northumberland's River. It contains a small part of the signposted Duke's River Walk, a local recreational route. The western section lies within an Archaeological Priority Area. As the parcel has local historic, biodiversity and recreational value, it scores weak-moderate (2) for criterion 3.

London Plan MOL Criterion 4: 'Forms part of a strategic corridor, node or link in the network of green infrastructure and meets one of the above criteria'

The parcel meets criterion 1. The fairly large green space and the Duke of Northumberland river corridor contribute to an important local wildlife corridor. It offers good connectivity north to south through two PRowS, including the signposted Duke's River Walk along the river, however the rest of the parcel is private therefore overall it has fragmented accessibility. Hard standing east of the river associated with Twickenham Station is likely to provide no wildlife value. As the parcel has fragmented access for people and is likely to provide a small contribution to a wildlife corridor along a local river, it scores moderate (3) for criterion 4.

Conclusion

Overall comment

Overall the parcel fulfils its role for MOL purposes, meeting criteria 1 and 4. However, the eastern edge of the parcel is developed and does not meet the MOL criteria.

Strategy and Recommendations

	Conserve	Enhance	Restore	Review	
--	-----------------	---------	---------	---------------	--

The eastern edge of the parcel, hard standing associated with Twickenham Stadium, meets none of the MOL criteria and it is recommended that its MOL status is considered further.

Appendix 2 -
Photographs showing how
eastern strip of MOL is used on
Match Days & Location map



View 1A



View 2A



View 3A



View 4A



View 5A



View 6A



View 7A

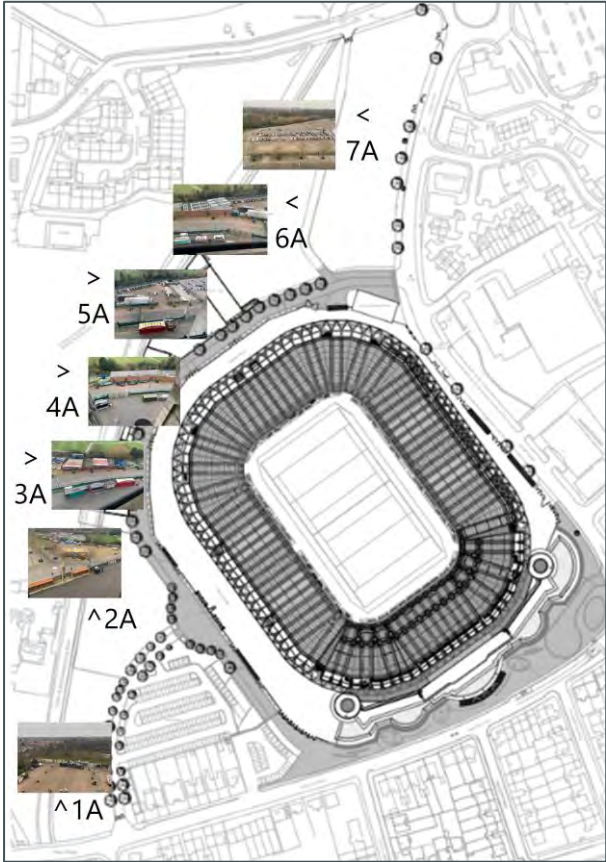


Photo location map (left) and MOL boundary (right)

Richmond Local Plan

Engagement event report

01 Project overview

OVERVIEW

- 01 Introduction
- 02 Event summary
- 03 Attendees
- 04 What did we learn?
- 05 Feedback
- Conclusions & next steps

Facilitating officers:

Grace Crannis, Senior Planning Engagement Officer.

Joanne Capper, Principal Planner

Richard Cruxley, Senior Planner

Joe Roberts, Senior Planner

Melissa McCallum, Planner

Blanka Hay, Senior Planning Advisor

Eoghan McConville, Senior Planner

Rob Wellburn, Senior Planner

Louis Osman, Planning Assistant

Sebastian Trinckvel, Information Monitoring Officer

01 Introduction

In January 2022, the Richmond Planning policy designed and delivered a series of workshops and Q&A events to support the Local Plan Regulation 18 Consultation.

The purpose of the events was to introduce the Draft Local Plan and some key policies and the wider role of Planning Policy to those who may not be familiar. The intention was also to sign-post people towards the statutory consultation.

As well as recording the details and outputs of the events that took place as part of the Local Plan consultation in 2022, this report is intended to illustrate the experience for officers delivering these events in-house; outline the opportunities for sharing knowledge with other Council teams; and reflecting on what we learned for future engagement opportunities.

Prior to the digital events, the planning policy team held two workshops with secondary schools in the borough in late 2021. These sessions were mainly focussed on education about the role of planning and balancing priorities in public spaces. At the end of the session, participants shared their views about what was important for Richmond in the future.

02 Event Summary

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Lunchtime Q&As

These events took place in the daytime and were a lighter touch version of the themed workshops. Each included a summary presentation of some key policies in the Draft Plan before opening the floor to questions.



Mapping workshop with Twickenham Secondary School



Walking workshop with Malden Oaks Pupil Referral Unit

Themed workshops

These events were held in the evening and took place on Zoom. An overview presentation was followed by guided discussion in breakout rooms where notes were taken using Miro. Facilitating officers shared their screen and led participants through the questions whilst collecting feedback. They were finished with a short Q&A.

These workshop style events are particularly resource intensive and require many officers in order to run the breakout discussions.

01 Environment & Greenspace

Tuesday 18 January 2022 | 18:30 – 19:40

We know that addressing the climate emergency is a shared priority. Our challenge is balancing the demand for housing and the focus of the Local Plan (which can only address new development) with policies that support our environment and greenspace.

The event for environment and greenspace was also attended by the Richmond Climate Change team who were able to introduce and respond to questions about the wider corporate objectives.



Mapping green and open spaces as part of the workshop warm up

Themes for the event:

- How we as planners are responding to the climate emergency and balancing the remit of the local plan with protecting our environment.
- Supporting our green & open spaces
- Urban greening & the public realm, and how this can link with active travel.
- Circular economy & the role of small sites in intensification and gentle density.

What questions did we ask?

1. How can we encourage urban greening & public realm improvement?

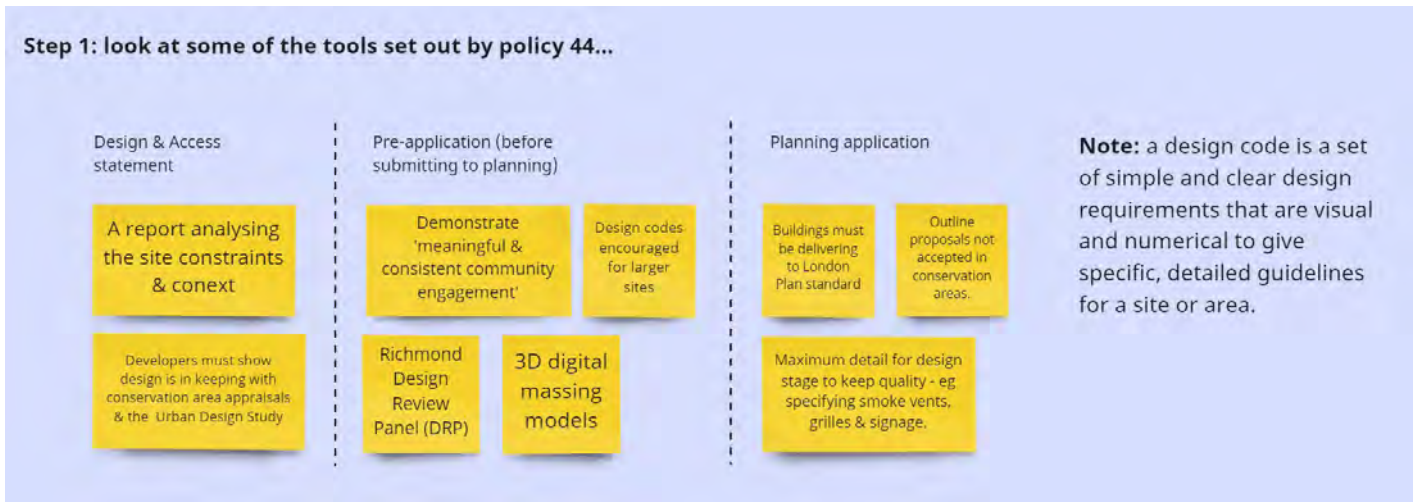
We can't implement schemes as part of the local plan but would like some ideas to strengthen and vary the policy.

2. What are your priorities for our public and open spaces?

It's a challenge to balance demands for competing uses and protecting the environment. How can we help get the right balance, and make people feel like custodians of their open spaces?

3. Do you have any place-based recommendations to share?

Are there any challenges or opportunities in your local areas in terms of open space or public realm?



Outlining tools to control design quality as set out by policy 44.

02 Housing & Design Quality

Wednesday 19 January 2022 | 18:30 – 19:40

High quality design is a key priority for making sure our places are accessible and continue to thrive. We also know how important it is to maximise delivery on our available sites to addressing demand for affordable housing.

Themes for the event:

- How well-designed places and new development can bring benefits for communities.
- Design quality & the role of conservation areas.
- Our need to respond to housing targets set by central government.
- Use and gradual intensification and gentle density for small sites that bring wider benefits and energy efficiency.
- An overview of our place-based strategies and incorporating the results of the Urban Design Study.
- Creating high quality & inclusive public space – with an emphasis on placemaking.

What questions did we ask?

1. What does good design mean to you?

We know design is subjective, and people have different tastes and style preferences. Think about buildings, benches, public spaces and open spaces. What works well and less well?

2. How can we deliver design quality in Richmond?

We have a set of tools (outlined in policy 44) to make sure developers deliver high quality buildings & places. Do you think these tools go far enough and are there any design quality challenges you are concerned about?

3. What do you think about our approach to small sites development?

What might some of the challenges and opportunities for delivering small sites be in your area?

03 Culture & Connection

Tuesday 25 January 2022 | 18:30 – 19:40

We know Richmond is rich in arts, culture and history and features the strong presence of the river. The 20-minute neighbourhood concept and new cultural quarters will be key to supporting growth of culture, creativity and tourism for the borough.

Themes for the event:

- The role of cultural quarters/clusters in the new draft plan.
- How we can support arts, culture and heritage.
- Supporting tourism and visitor accommodation after Covid-19.
- The 20-minute neighbourhood concept and encouraging sustainable travel.
- How we protect existing land uses in policy whilst responding to needs of the community and adapting to change.

What questions did we ask?

1. Ideas for Richmond's cultural quarters?

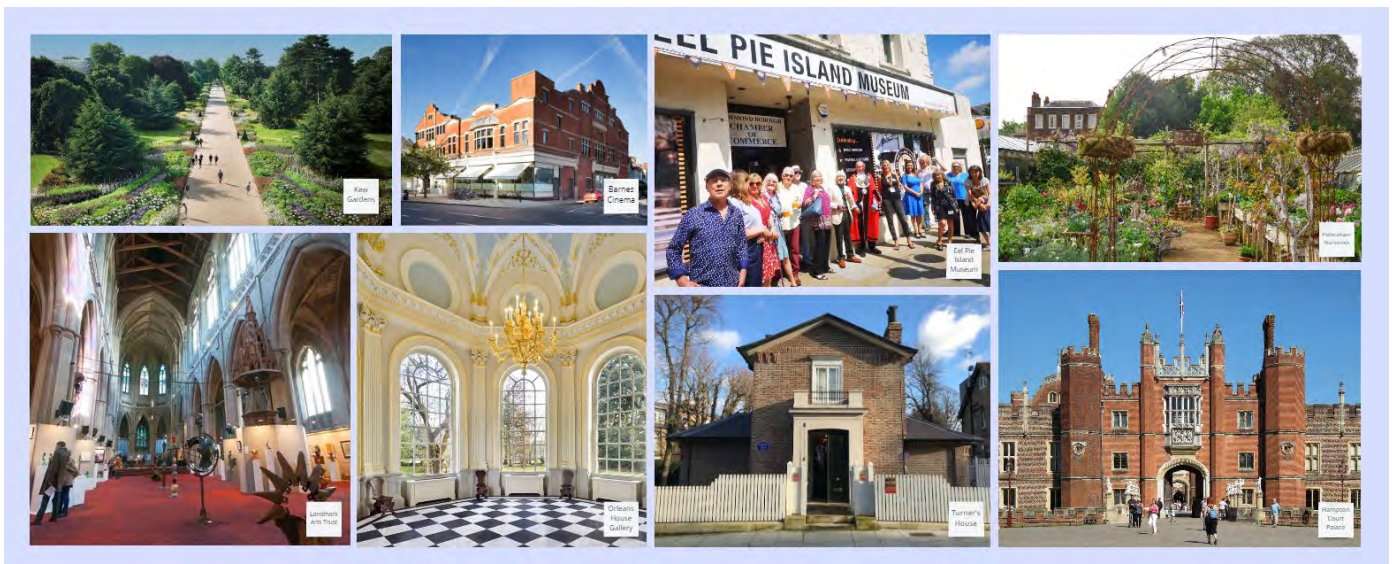
How can we define, enhance and celebrate culture and creativity in Richmond's main centres?

2. How can we also highlight our local assets?

We know Richmond is more than its main centres. How can we support and promote smaller cultural uses across the borough?

3. What might living locally mean for your area?

What might some of the challenges and opportunities for delivering 20-minute neighbourhoods be in your area?



Export from the Miroboard showing cultural venues across the borough.

03 Attendees

Events were promoted via the usual Council communications channels, including newsletters and social media. The Local Plan database were also informed. Events were well attended by a mix of predominantly residents as well as those visiting Richmond for work or leisure.

Most participants attended in a personal capacity, however some were representing local cultural or sports organisations, history societies, trusts, charities and professional bodies.

The events were well attended, and there was particular interest in the themed workshop for environment and greenspace, which had a sizable wait list (places had to be limited due to the workshop element requiring small groups with resources to facilitate).

Summary of registrations

How much knowledge would you say you have about the Local Plan?

Completely new to it	63
Have some knowledge	90
Have a good amount of knowledge	33
Expert	2
Total	188

Age of participants who registered

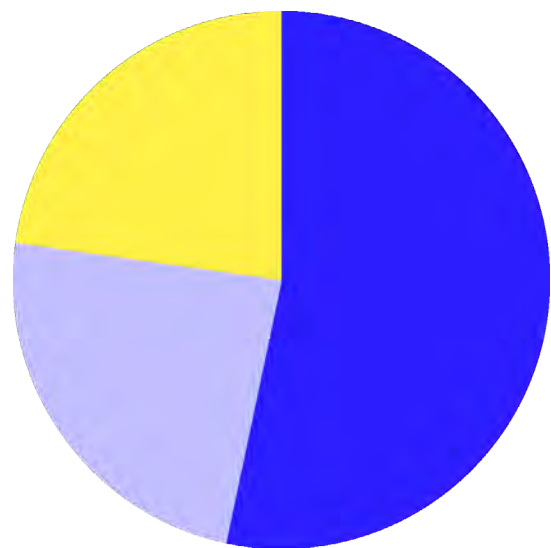
Under 18	0
19-30	12
31-65	122
66-84	57
85 or over	1
Prefer not to say	6
Total	188

Ethnic identity of participants who registered

White	151
Black / African / Caribbean / Black British	0
Other ethnic group	2
Asian or Asian British	8
Mixed / multiple ethnic groups	9
Prefer not to say	18
Total	188

58% of registrations identified as women, 41% as men, and 7% preferred not to say.

What connection do you have with Richmond?



Pie chart showing the breakdown of participants who live, work and play, or visit the borough in a social capacity.

04 What did we learn?



Chiswick Quay



Ham Close

01 Environment and Greenspace

There were many suggestions to support our urban greening policy:

- An interest in integrating policy requirements for items like bee bricks and bat and bird boxes.
- Proper maintenance and consideration of trees - not just numbers.
- Pop up allotments and food growing spaces, using as educational tools.
- Desire for sensory planting and areas of wildflowers.

Concerns were raised about biodiversity in Twickenham Riverside and the need to protect greenspace from infill development. There were also concerns about tree removal and the level of protection given to trees in policy.

Other ideas included better connections between the 'Green' and the 'Blue', for example in Radnor Gardens to improve the park to river access for things like paddleboarding and jetties to flow into park. There was also support for more covered outdoor spaces that can be used in all weathers.

Participants also expressed desire that new homes had very high energy efficiency standards, and those developers were held to account on this.

02 Housing and Design Quality

Some responses to the meaning of 'good design':

- Materiality – detailed proposals at ground floor where live or interact.
- Contemporary better than pastiche.
- Should ideally promote a sense of connection with surroundings and the area.
- Bring people together in communal spaces and encourage a sense of community.
- Ideas to improve design quality focused on function, longevity, connection and sustainability.

A requirement to consider the lifespan of material choices during planning, for example timber cladding, was also suggested. Concerns were raised about implementation and monitoring as being a barrier to design quality. There were also caution about expecting the planning process to do too much.

In terms of small sites feedback, there was agreement with the principle of encouraging development where there already is development. Given the range of styles and site types with small sites development, it was felt that designs should be judged by individual merit and that conservation area status may prove a challenge.

There was also a wish to see a more joined up approach in terms of small sites development.

03 Culture and connection

In terms of ideas for Richmond’s cultural quarters, there was demand for pop-up and season use of spaces, as well as emphasising ‘hidden gems’ and heritage, culture and art trails.

There were many comments in support of improved wayfinding and sign-posting, as well as noting the lack of public toilets and bins that became particularly apparent during lockdown.

Clarity over what is considered ‘culture’ in planning terms would be appreciated, as there was support for the concept of cultural quarters but concern of activities or certain uses being excluded.

It was also recognised that the Council should not always be organising, but encouraging and supporting residents to organise their own arts and culture events.

Ideas for highlighting our local assets included:

- Breakdown barriers to ensure people feel able to attend.
- Links and connections to other cultural places.
- Transport links between more local areas and key stations.
- Increased use of the river as a third is greenspace.
- More murals and public art.

There was also general support for the 20 minute neighbourhood policy.



Features of a 20-minute neighbourhood



Responses to question 3: what might living locally mean for your neighbourhood?

05 Feedback & next steps

Any outstanding questions that were not answered during events or topics that were raised across multiple sessions were added to an FAQ page on the website with an officer response. Key areas of interest included:

- How the Council and planning team are addressing climate change issues.
- How the Council allocates and spends the Community Infrastructure Levy (CIL) fund.
- Understanding priorities with housing supply.
- Plans to improve road & cycling safety and pedestrianisation.
- Safe spaces at night.
- Controlling design quality through planning.
- Conflict between energy efficiency improvements to homes with heritage status.
- Provision of community services and population numbers.

What did participants say?

Feedback from attendees was generally positive, although it is worth noting that a small proportion of attendees completed the form.

“I had a better appreciation of the LP’s [local plan’s] areas of focus and also what it does not consider.”

“I thought the questions in the breakout session were not geared towards the key concerns of most participants surrounding the issue of large-scale development next to or on existing green spaces and safeguarding these for public enjoyment.”

“All Council employees presented well and were very clear.”

“It would have been productive for attendees to have been given sight of the questions they were being asked to respond to ahead of time, to allow for both broader and more meaningful participation from attendees.”

“I learned about lots - about the scope of the plan, the relationship of the plan with the GLA and central Government - and a sense that consultation could be widened to help create relevance to the local population.”

“I didn’t learn anything new, but I was reminded again how complex the issues are.”

Next steps

The Policy team will now reflect on the comments that were raised during the engagement events and the formal consultation process. A separate overarching consultation report, including summaries of issues raised across the whole consultation, and the Council’s responses to the comments raised will be published later in 2022.

The Local Plan will be redrafted for the next phase of the process, known as the ‘Publication’ or ‘Regulation 19’ which is due to be consulted upon late in 2022.

The timetable is set out at www.richmond.gov.uk/draft_local_plan