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Manager
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Housing, Planning and Economic
Regeneration
London Borough of Hounslow

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Date: 31/07/2023

Dear Ms. Andrea Kitzberger-Smith,

1. Thank you for providing the London Borough of Hounslow (LBH) with the opportunity to respond to the London Borough of Richmond upon Thames (LBRuT) Local Plan Publication (Regulation 19) Consultation. We are also grateful for the extension of time in order to allow us to liaise with our colleagues in the Transport Planning and Policy team before providing our response.
2. LBH is broadly supportive of LBRuT's overall spatial strategy, including the focus on Living Locally and 20-minute neighbourhoods, but reluctantly raises a HOLDING OBJECTION to the Local Plan, pending publication and consideration of the further information LBRuT intends to publish in relation to the transport and highways impacts of the Plan.

Site Allocations

3. LBH note that there are a number of large site allocations located close to the shared boundary which are proposed for residential, amongst other uses
 - Site Allocation 4: Carpark for Sainsburys, Uxbridge Road, Hampton
 - Site Allocation 18: Homebase, Twickenham Road, Hanworth (*new site allocation*)
 - Site Allocation 21: Kneller Hall, Whitton
 - Site Allocation 31 Kew Retail Park, Bessant Drive, Kew
 - Site Allocation 35: Stag Brewery, Lower Richmond Road, Mortlake (*LBH also note the currently in progress outline scheme on this site for up to 1,085 homes for which LBH have submitted comments – your reference 22/0900/OUT*).
4. As discussed at a duty to cooperate meeting between officers from both boroughs on 19th July 2023, LBH note that the emerging allocations have been reformatted to include more information relating to existing context and constraints, and that 3 new allocations have been added whilst some have dropped away.

5. LBH also note that no minimum development quanta for either residential units or non-residential floorspace have been provided within site allocations, and no set maximum height parameters. LBH request that should development come forward on these sites, LBRuT engage with our development management officers at the earliest possible opportunity in order to ensure that any cross-boundary impacts can be adequately assessed and addressed.

Housing Policies

6. LBH note the findings of the 2023 update to the Local Housing Needs Assessment, and the updated approach to meeting your London Plan housing target (411 dpa) and supporting the provision of affordable housing within Policies 10 and 11.
7. LBH note the findings of LBRuT's Research on Gypsies and Travellers (updated in 2023) and the policy position articulated at Policy 12 C).
8. LBH will look to agree positions with LBRUT on meeting housing need through a Statement of Common Ground (SoCG) in coming months.

Employment Policies

9. LBH note the findings of the Employment Land & Premises Needs Assessment update (2023) with regards to identified need for office and industrial floorspace.
10. LBH also note the plan approach toward avoiding any net loss in existing office or industrial floorspace whilst supporting new development in appropriate locations (Policies 23 and 24). LBH also support the approach to the provision of affordable workspace in Policy 25.
11. LBH will look to agree positions with LBRUT on meeting employment needs through a Statement of Common Ground (SoCG) in coming months.

Heritage and Conservation

12. LBH, LBRuT and Royal Botanic Gardens, Kew have engaged extensively throughout the development of LBH's Great West Corridor development plan document in relation to cross-boundary conservation and heritage matters. To date this has looked specifically at the impact of tall buildings in the Brentford area upon the UNESCO World Heritage Site at Royal Botanic Gardens, Kew. This engagement led to the production of a SoCG between the three parties in December 2020.
13. As LBH progress with the consolidated Local Plan Review, we would welcome further engagement on these matters with LBRuT and Royal Botanic Gardens, Kew to ensure that we have fully considered all potential cross boundary impacts as we progress with our Local Plan review.

Transport and Highways Impacts

14. LBH note that LBRuT have not produced a strategic transport study and/or a highways impact assessment to support the Regulation 19 consultation on the Publication draft Local Plan. Following our most recent duty to cooperate meeting, it is understood that LBRuT are intending to draw together existing transport and highways information that has assisted LBRuT to understand the likely traffic impact of the Local Plan into a Background Paper, and that this will be shared with interested parties later in the Summer of 2023.
15. Unfortunately, because this information is not available to review at the time of the Regulation 19 consultation, LBH Transport officers have not been able to assess the potential cumulative impacts of LBRuT's proposed housing growth on both the road network and public transport demand locally.
16. It is noted that there are a number of large site allocations located close to the shared boundary which are proposed for residential, amongst other uses (see list above). Given the proximity of these sites to key roads and junctions which cross the shared boundary (specifically the A316 Great Chertsey Road / A312 Hampton Road West/Uxbridge Road, B361 Whitton Road / Whitton Dene and South Circular A205) and the lack of information relating to minimum development quanta for residential units and other non-residential floorspace within the allocations themselves, LBH are not able to determine whether LBRuT's current proposals would be acceptable in terms of transport and highways impacts.
17. Given the above, LBH raise a holding objection until such time as the evidence relating to the assessment of transport and highways impacts can be reviewed. Should this information demonstrate that there would be no significant cumulative impact upon the road network and public transport demand which would result in cross-boundary issues, LBH will withdraw its objection prior to the commencement of LBRuT's examination hearings.
18. LBH also note the proposed Site Allocation 19: Fulwell Bus Garage, which would involve retention and safeguarding of the bus garage operation, unless it is demonstrated that this is operationally no longer needed or that enhanced re-provision has been made elsewhere in a convenient and accessible alternative location (as per supporting text to emerging Policy 47 at paragraph 23.21). Should this site come forward, LBH would urge LBRuT to work with TfL and bus operators to ensure there is no interruption to the operation of the bus garage so as to ensure there are no resulting cross-boundary impacts to public transport provision.
19. We would welcome the opportunity to engage further on this and other strategic matters through continued duty to cooperate discussions in the coming months. Following this, LBH hope that we can agree positions with LBRuT relating to cross-boundary matters within a Statement of Common Ground at the earliest opportunity.
20. We look forward to continuing to work together in preparing your new Local Plan. Please feel free to contact the Spatial Planning team by phone or email.

Yours sincerely,

Ian Gillespie

Interim Head of Spatial Planning
Housing, Planning and Economic Regeneration
