



Network Rail
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Via email: localplan@richmond.gov.uk

24 July 2023

Dear Sir/Madam

NETWORK RAIL RESPONSE TO LONDON BOROUGH OF RICHMOND REGULATION 19 CONSULTATION

Thank you for providing Network Rail (Southern) the opportunity to make comment on the pre-submission version (Regulation 19) of the Local Plan. It is important that the policies within the Local Plan reflect the aspirations of Network Rail and the wider rail industry as far as possible, and that the Plan provides suitable flexibility to support future growth of the railway for both passenger and freight services. The railway network is a vital element of the country's economy and a key component in the drive to deliver the Government's sustainable agenda.

In addition, Network Rail is a statutory undertaker responsible for maintaining, operating and developing the main railway network and its associated estate. Our aim is to protect and enhance the railway infrastructure, therefore any proposed development which is in close proximity to the railway line or could potentially affect Network Rail's specific land interests will also need to be carefully considered.

Network Rail is a statutory consultee for any planning applications proposing development likely to result in a material increase in the volume or a material change in the character of traffic using a level crossing over a railway. It is important that policies within the plan acknowledge the need for the impact of new development to be assessed and mitigated, both on an individual site by site basis, as well as the cumulative impact of multiple site allocations and/or windfall sites brought forward in the plan period. Within the plan area, there are several level crossings in the Borough, some of which are impacted upon by proposed site allocations.

The following comments are designed to help strengthen the policies within the Richmond Local Plan and their ability to deliver our objectives.

Policy 1

Network Rail supports the strategy to encourage 20-minute neighbourhoods and for people to use public transport. Point 2 of the Policy indicates a desire to improve access to public transport and for those who have mobility issues. Network Rail supports this however we do not believe the Plan goes far enough in addressing these matters fully. There are twelve mainline rail stations across the Borough and Richmond supports a huge part of the rail network into and out of London. Network Rail believe that the Plan should better support the rail network in the subsequent Policies to reflect the aspirations of Policy 1.

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

Network Rail does not believe that this place-based strategy is sound as it fails to accord with the spatial strategy of the Plan and is therefore neither positively prepared nor justified. Network Rail believes that these soundness issues can be overcome with some additions to the wording in the strategy and the site allocations so that these actively promote improved access to the rail network for all users and include reference to capturing developer and third-party contributions to help to fund these improvements.

Site Allocation 15 – Station Yard, Twickenham

Network Rail supports the allocation of this land and opportunities to maximise density should be sought due to the sustainable nature of the site. Network Rail supports the desire to improve access to Twickenham station with improved pedestrian and cycle routes.

Site Allocation 19 – Fulwell Bus Garage

Network Rail supports the allocation of this site and the recognition of the opportunities that come with any re-development in improving access to Fulwell rail station. Fulwell station is one of the few stations in Richmond that has limited access for users. It does not support step free access and has not been given funding for Access for All footbridge and lifts to be installed. Network Rail are supportive of attempts to secure improvements to this station and re-development adjacent and in close proximity to the site would assist in providing for these improvements.

In its current form, this site allocation does not support Policy 1 as part of the Local Plan strategy as it fails to identify opportunities around improving access for all users and is therefore unsound. To make this sound, specific reference should be made to '*seeking developer and other third-party contributions towards improving identified factors that limit access to the station*'.

Network Rail recognises the need to retain the bus garage so that the operational requirements can be met. However, the site does lend itself to residential-led development given its proximity to public transport facilities. Given the proximity of the bus garage to the rail station, this operates as a defacto public interchange and the opportunities to encourage users to switch public transport modes is significant.

As well as noting the potential for improved access at the station in the allocation, as specified above, Network Rail suggests that reference to this is also made in the Infrastructure Delivery Plan (IDP). The site allocations in the Plan should show a clear

connection to the most-up-date evidence such as the IDP, to ensure that these are compliant with national policy.

Place-based strategy for Richmond and Richmond Hill

Overall, this place-based strategy is not sound as it fails to fully consider improvements to access public transport facilities, including rail stations. The strategy notes a desire to 'improving the sense of arrival at North Sheen station' however this does not fully address improving access to the station. Given that, in the case of North Sheen, there are two site allocations which support significant re-development opportunities which are in close proximity to North Sheen station. Network Rail believe that the strategy should go further to secure improvements to the station to aid improved access.

To make this sound, Network Rail suggest that reference is made within the place-based strategy to 'actively seeking and promoting the securing of developer contributions and use of other third-party funding to improve access to the rail stations within the Place for all users, including those with mobility issues'. Opportunities for this include the provision of lifts at stations, improved access from the public highway and providing step-free access at stations, where this is required.

Site Allocation 25 – Richmond Station

Network Rail supports the allocation of this site and the opportunities brought forward by this. Any non-railway development should be undertaken so as not to impact upon passengers or the efficient running of the railway. As part of the allocation, opportunities should be sought to capture improvements to the station itself.

Site Allocation 29 – Homebase, Manor Road North Sheen

Network Rail supports the allocation of this site and notes that there is an application currently subject to determination by the Mayor of London. The proximity of the site to North Sheen train station provides opportunity to secure improvements to this given the anticipated increase in users from the development. The station could benefit from improved facilities, including improving the footbridge and the provision of cycle storage. Additionally, there is a level crossing located adjacent to the development site. The crossing is mitigated to an extent by the existing footbridge however the re-development would likely bring an increase in the number of pedestrians, cyclists and vehicles into conflict with this crossing and the railway line. It is therefore essential the level crossing is included within the site allocation and that reference is made for the potential to secure any further safety mitigations as deemed necessary. from this development, to protect both rail passengers and members of the public when using the crossing.

Site Allocation 30 – Sainsburys, Lower Richmond Road

Network Rail supports the allocation of the site however, as with site allocation 29 above, there remains the opportunity to capture contributions from this re-development to improve access to North Sheen station for all, including those with mobility issues. The allocation should be amended to include reference to securing '*developer and third-party contributions towards improving identified factors that impact access to and around the station for all users*'. Additionally, as above, reference should be made within this allocation to the level crossing and the potential to secure any further safety mitigations that may be required for this, because of development.

Place based strategy for Kew

Network Rail supports this strategy for Kew especially in maintaining and enhancing the retail offer around Kew Gardens station as well as wayfinding at the station and promoting active travel.

Place based strategy for Mortlake and East Sheen

Network Rail supports reference within the strategy to ‘enhance the sense of arrival and quality of the public realm at Mortlake Station, including improved accessibility through opportunities for art and wayfinding’. However, Network Rail does not believe that this place-based strategy is sound as it fails to accord with the spatial strategy of the Plan and is therefore neither positively prepared nor justified. Network Rail believes that these soundness issues can be overcome with some additions to the wording in the strategy and site allocations so that these *‘actively promote improved access to the rail network for all users’* and includes reference to *‘capturing developer and third-party contributions to help to fund these improvements’*. Reference should also be made within this to the level crossing located at Mortlake station which is a significant barrier to users. Redevelopment in and around Mortlake will result in increasing conflict between vehicles, pedestrian and cyclists with the level crossing and this challenge should be recognised in Policy.

Site Allocation 35 – Stag Brewery

The site allocation, and current planning application being determined by the Council, indicates a significant re-development of the site to effectively provide a new centre for Mortlake. A development of the size and scale proposed will only exacerbate the challenges of the level crossing and ensuring people can safely cross and also access the station. Whilst there is an existing footbridge which takes people away from the crossing this is not suitable for all, especially more vulnerable users, and this means the crossing remains a barrier. To mitigate safety issues around this, opportunities to secure developer and other third-party contributions should be sought to help address the issues arising from development.

To make it sound, the allocation should be amended to include reference to securing *‘developer and third-party contributions towards improving identified factors that impact access to and around the station for all users’*. Additionally, reference should be made within this allocation to the level crossing and the potential to secure any further safety mitigations that may be required for this, due to development.

Given the prominence and location of the level crossing in Mortlake, that it is not considered within the site allocation nor the strategy in any detail is concerning. The Stag Brewery Planning Brief also fails to mention the issues of the level crossing and this needs to be addressed to ensure the impacts of the crossing in the wider context of the scale of development proposed.

Place-based strategy for Barnes

Network Rail supports the strategy in seeking to improve connectivity including wayfinding from the station (in point 3) and improving the public realm to enhance the sense of arrival at Barnes Station (point 4). Network Rail also supports the additional policy initiative around step free access at Barnes Bridge station. Network Rail are keen to help the Council in this aim and to work with the Council to investigate suitable funding opportunities for this. Network Rail believes a similar approach could be adopted for other stations in the Borough where there are identified improvements required, such as at

Fulwell and North Sheen, and this could be included within their respective place-based strategies.

Policy 47: Sustainable travel choices (Strategic Policy)

Part C of this policy states references access the need to provide for inclusive mobility as a result of new development. Network Rail agree with this and also believe that such an approach could and should be broadened out to include access to rail stations where these new developments are in close proximity. By not linking development with access to rail stations, as a key part of the public transport network, the Plan fails to accord with its strategy within Policy 1.

Part H of this policy states “*Where appropriate, ensure that their development proposals safeguard land required for transport schemes and infrastructure set out in the London Plan and/or the Council’s Local Implementation Plan*”. Network Rail agree that appropriate land for transport should be safeguarded as part of development proposals. This will need to be based on existing and future operational requirements and does not preclude the provision of this infrastructure alongside other forms of development, should this be appropriate and not impact upon operational requirements.

Conclusions

The Local Plan advocates active travel and utilisation of public transport as well as encouraging car free and car lite development. This approach is laudable and one that Network Rail supports however it cannot be said that the Plan goes far enough in implementing this aim. There are opportunities around rail stations that the Council have not included reference to which could help to facilitate and deliver on this. In failing to fully consider and address these opportunities, the Plan does not support its own strategy of ‘living locally’ and facilitating access for all users to public transport.

Network Rail are keen to work with the Council to ensure that the Local Plan delivers on its aims whilst also ensuring that new development and other sources of funding provide for improved facilities and access for all users to the rail network.

I trust that the above is clear, should you require additional information please do not hesitate to contact me.

Kind regards,

Craig Hatton MRTPI
Senior Town Planner