



Local Plan Publication Consultation

From 9 June 2023 to 24 July 2023

RESPONSE FORM

The Council is inviting comments on the Publication version of the Local Plan.

The Local Plan sets out a 15-year strategic vision, objectives and the spatial strategy. The draft Plan includes place-based strategies covering the whole borough, along with accompanying site allocations, as well as the thematic planning policies that will guide future development in the borough. It will inform how growth will be accommodated across the borough. The draft Plan seeks to address future challenges including climate change, health, affordability and liveability.

This consultation is the final opportunity to comment on the Local Plan before it is submitted to the Secretary of State for independent 'examination in public'. At this stage in the plan-making process, in accordance with the national guidance, consultation responses should focus on whether the Local Plan has been developed in compliance with the relevant legal and procedural requirements, including the duty to cooperate, and with the 'soundness' of the Plan. Further detail on these concepts is provided in the accompanying guidance notes available on the website (via the link below).

How to respond

Please read the consultation documents and other background information made available on the Local Plan website: www.richmond.gov.uk/draft_local_plan_publication_version

You can respond by completing this form, either electronically using Word or as a print out, and sending it to the Council by:

- Email to LocalPlan@richmond.gov.uk
- Post a hard copy of the form to Spatial Planning and Design, LB Richmond upon Thames, Civic Centre, 44 York Street, Twickenham, TW1 3BZ.





Alternatively, you can make comments on the draft Local Plan **online via our Consultation Portal**, which is accessible at the website listed above.

All responses must be received by 11:59pm on Monday 24 July 2023. The consultation is open to everyone; however please note that responses will not be treated as confidential and those submitted anonymously will not be accepted.

This form has two parts:

- Part A – Personal details and about you
- Part B – Your detailed response(s).

Part A: Personal Details

	1. Personal Details *	2. Agent's Details (if applicable)
Title	Mr	
First name	Alan	
Last name	Smith	
Job title (where relevant)	N/A	
Organisation (where relevant)	N/A	
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.

Data protection

The Council is committed to ensuring that personal data is processed in line with the General Data Protection Regulation (GDPR) data protection principles including keeping data secure.

The Council's Privacy Notice is published on the webpage www.richmond.gov.uk/data_protection

All responses will be held by the London Borough of Richmond upon Thames. Responses will not be treated as confidential and will be published on our website and in any subsequent statements; however, personal details like address, phone number or email address will be removed.

If you submit comments, the consultation responses and your personal data will be passed to the Planning Inspectorate and a Programme Officer. The Programme Officer manages the procedural and administrative aspects of the examination. The Programme Officer will contact you using the personal

information you have provided if you have indicated in the response form your wish to engage in the Examination.

Part B: Your Response

3. To which part(s) of the draft Local Plan does your response relate to?

Please indicate the documents **and** the specific paragraph numbers, policy or site allocation numbers and names, maps or tables you are commenting on.

Documents		Sections	
Publication Local Plan (including changes to the Policies Map designations)	<input type="checkbox"/>	Page number(s)	n/a
		Paragraph number(s)	16.52 - 16.86
		Policy no./name	8
		Place-based strategy	
		Site Allocation(s) no./ name	
		Maps	
		Tables	
Sustainability Appraisal Report	<input checked="" type="checkbox"/>	Page number(s)	29,
		Paragraph number(s)	Table 1.3 item 5
Other (for example an omission or alternative approach)	<input type="checkbox"/>		

4. Do you consider the Local Plan is:

4.1 Legally compliant	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
4.2 Sound	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
4.3 Complies with the Duty to Co-operate	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

Further information on these terms is included within the accompanying guidance note, which can be found on the website at www.richmond.gov.uk/draft_local_plan_publication_version

If you have entered 'No' to 4.2, please continue with Q5. Otherwise, please go to Q6.

5. Do you consider the Local Plan is unsound because it is not:

5.1 Positively Prepared	<input checked="" type="checkbox"/>
5.2 Justified	<input checked="" type="checkbox"/>
5.3 Effective	<input checked="" type="checkbox"/>
5.4 Consistent with national policy	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is or is not legally compliant, unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to provide comments in support of the legal compliance and/or soundness of the Local Plan, or its compliance with the duty to co-operate, please use this box to set out your comments.

Please note your response should provide succinctly all the information, evidence and supporting information necessary to support / justify the response. After this stage, further submission will only be at the request of the Inspector, based on the matters and issues they identify for examination.

My adverse comments and concerns all relate to the mismatch in the content of the Draft Local Plan and its related Sustainability Appraisal on Flood Risk Strategies and risk reductions / no intensification of use / provision of compensation required. The "Strategic Policy" states

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. In Flood Zones 2 and 3, all proposals on sites of 10 dwellings or more or 1000sqm of non-residential development or more, areas at Risk of Flooding from Surface Water in a 1 in 100 year event or greater, or on any other proposal where safe access/egress cannot be achieved, a Flood Emergency Plan must be submitted. D. 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.

Study of the site specific locations particularly those in the main High Street Zone are all in key areas at risk.

Elsewhere properties along the Riverside which are at heightened risk include sites where future development is planned.

The Sustainability Appraisal lists at items 5

5) To adapt to the effects of a changing climate by protecting and managing water resources, and avoiding or reducing flood risk from all sources.

This has to be demonstrated practically and delivered in the detailed implementation of these generic policies.

LBRuT is not the cause of major flooding risks as predicted but it is the RECEIPT of fluvial water / storm waters from others. As such the LBRuT policies and strategies must be wholly dependent on a joined up river basin strategy with the E A / others that embraces a vast area beyond LBRuT boundaries. This reality is opaque in the wording of the DRAFT documents under review. It should be wholly transparent. It is not.

The combined risks of tidal / storm surges from the N Sea (Thames Barrier when raised holds tidal waters in) and high rainfall in the upper Thames catchment zone causing surcharging and surface water flooding upstream of Teddington Lock at the same time will exceed temporary small flood plain capacities.

It must be remembered that the tragic German floods and fatalities resulted from a breakdown of "planned" emergency measures, pre-warnings and other anti-flood measures in Germany in 2021. Repairs took years.

That disaster was a failure of BOTH the established emergency warning and evacuation processes that had been set up years before to deal with such threats AND the failure of upper river basin measures to slow down and control rapid storm surface water run-off volumes entering the rivers and surcharging all existing

physical barriers and other control measures. The flood risk had been predicted before and was ignored.

The overall costs to residents and businesses in LBRuT should flooding of the sort / extent that occurred in Germany in 2021 would be of an order way beyond the costs of other policies herein this DRAFT. No doubt LBRuT would seek HMG support / grants / insurances. That timetable would be wholly unacceptable. It was in Germany in 2021 and remains so today. Hindsight is no reason to attempt to avoid / excuse responsibility.

Both the LBRuT SFRA and this Draft Local Plan / Sustainability Appraisal and the EA / River Thames Scheme still rely on similar flood planning and pre-warnings to evacuate the areas at risk – NOT PREVENT / MITIGATE the flooding by upper river risk management and slowing the flow rates over many tidal periods.

It must be remembered that if / when flooding occurs the FLOOD RE insurance scheme does NOT extend coverage to flats – of which there are many developments along the Thames within LBRuT boundary.

Study of the content of LBRuT Strategic Flood Risk documentation and its maps confirm the full extent of the overall areas in Teddington (others areas apply) that require more direct and positive risk reductions than those set out in the DRAFT LOCAL PLAN etc. This has to be in cooperation with other national agencies.

There is inadequate detail and proposed measures set out in this DRAFT to reassure residents this is so.

The need to redevelop key sites in central Teddington is understood but these local sites must be examples of how the future flood risks generally will be mitigated / removed as part of any medium / long term plan.

It is my opinion that this is inadequate as drafted and all related flood risk strategies need a further review.

It should include ALL related risks of sewage flooding as a result of the system being unable to accept new intake capacity due to the pipework being overwhelmed by fluvial / surface water flooding as shown on the related maps in these supporting studies.

The recent National Emergency Phone Alert Test on 23 April 2023 failed to reach my mobile phone.

It is likely, indeed , that the policies and strategies on Local Plans may be in part in conflict with those of other national documents. This should not be regarded as a criticism of either documents which are the result of discrete and separate processes. However it is crucial to overall planning and delivery of all “joined up” development that ALL such areas of conflicting interests are identified and given priorities to enable efficient evaluation of pre-development options prior to formal applications for statutory consents. A Local Plan may be primarily and rightly focused on local issues. These may be secondary to those of wider / national interests

On matters of flood risks, life safety and related property damage it is reasonable to acknowledge raised surface water levels in any lower river basin catchment areas may be the result of issues outside of the Local Plan zone. This needs to be transparent in Local Plan documents and related processes. It is not.

A “joined up “ approach is required and this appears not to have been done adequately in the current drafts.

Please continue on a separate sheet / expand box if necessary.

7. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, when considering any legal compliance or soundness matter you have identified at 6 above.

Please note that non-compliance with the duty to co-operate is incapable of modification at examination.

You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please note your response should provide succinctly all the information, evidence and supporting information necessary to support / justify the suggested change. After this stage, further submission will only be at the request of the Inspector, based on the matters and issues they identify for examination.

The LEAD flood risk strategy must remain with EA / SFRA and rely on whole river basin flood risk control and management including the Thames Barrier / tidal surges that prevent normal river tidal flows from upstream being able to be discharged safely and timely .

This Draft Local Plan appears to inadequately address and recognise this hierarchy transparently despite reference in the Sustainability Appraisal at ITEM 5 - see above extract. in principle to “avoid or reduce” flood risks from ALL sources.. This should include any increases in foul / surface water loading on the existing combined sewage pipework system through further development without new anti-flood measures within ALL new developments together with improved measures to “avoid and reduce” the EXISTING risks defined in the various graphs / maps etc of the SFRA & EA documents.

This new Local Plan needs to adopt an holistic overview to flood risks and their causes in the Borough both from within and externally beyond the Borough. It appears inadequate to do so.

Please continue on a separate sheet / expand box if necessary.

8. Do you consider it necessary to participate in examination hearing session(s)? (Please tick box as appropriate)

No , I do not wish to participate In hearing session(s)	<input checked="" type="checkbox"/>	Yes , I wish to participate In hearing session(s)	<input type="checkbox"/>
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Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

9. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Please continue on a separate sheet / expand box if necessary.

10. If you are not on our consultation database and you respond to this consultation, your details will be added to the database. This allows us to contact you with updates on the progression of the Local Plan and other planning policy documents.

If you do not wish to be added to our database or you would like your details to be removed, then please tick this box.

Signature:

For electronic responses a typed signature is acceptable.



Date:

19 July 2023