

Comment

Consultee	Louise Fluker (1338297)
Email Address	[REDACTED]
Address	[REDACTED]
Event Name	Local Plan Publication Consultation June 2023
Comment by	Louise Fluker (1338297)
Comment ID	14
Response Date	20/07/23 00:05
Consultation Point	4.13 Paragraph (View)
Status	Submitted
Submission Type	Web
Version	0.1

Part(s) of Local Plan responding to

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

Please indicate the documents(s) and part(s) you are commenting on.

Publication Local Plan (including changes to the Policies Map designations) - Page number(s) / Paragraph number(s) / Policy no./name / Place-based strategy / Site Allocation(s) no./ name / Maps / Tables

Sustainability Appraisal Report - Page number(s) / Paragraph number(s)

Other (for example an omission or alternative approach)

Paragraph 4.13

Legal Compliance, Soundness and Duty to Co-operate

Do you consider the Local Plan is:

Legally Compliant	.	Yes
Sound	.	No
Complies with the Duty to Co-operate	.	Yes

Reason Consider Unsound

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

. Justified

Details of reason(s) for representation

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.*

Again the Plan does not make provision for those less mobile people who have no alternative but to drive or be driven

Modification(s) consider necessary

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Amend the second sentence to read: "Development proposals should contribute to increasing accessibility of these centres by foot, bike, and public transport, thus reducing dependency on car use except for those who have mobility issues"

Participation at Examination

Do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing session(s)

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Email Address	[REDACTED]
Address	[REDACTED]
Event Name	Local Plan Publication Consultation June 2023
Comment by	Louise Fluker (1338297)
Comment ID	15
Response Date	20/07/23 00:09
Consultation Point	Site Allocation 25 Richmond Station, Richmond (View)
Status	Submitted
Submission Type	Web
Version	0.1

Part(s) of Local Plan responding to

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

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Publication Local Plan (including changes to the Policies Map designations) - Page number(s) / Paragraph number(s) / Policy no./name / Place-based strategy / Site Allocation(s) no./ name / Maps / Tables

Sustainability Appraisal Report - Page number(s) / Paragraph number(s)

Other (for example an omission or alternative approach)

Site Allocation 25 - Richmond Station, Richmond

Legal Compliance, Soundness and Duty to Co-operate

Do you consider the Local Plan is:

Legally Compliant	.	Yes
Sound	.	No
Complies with the Duty to Co-operate	.	Yes

Reason Consider Unsound

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

. Justified

Details of reason(s) for representation

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The draft Local Plan refers to Richmond Station: "Its 1930 Art Deco façade and entrance/booking hall make it worthy of its BTM status, though the side and rear of the building is unattractive and is not considered to contribute to the setting" Developing buildings behind the station of 7-8 storeys runs the risk of making the facade (designed by the same architect who designed Surbiton Station which is listed) look ridiculous. The centre of Richmond is not a high rise area so anything more than the surrounding area will look out of place

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Delete "a small area next to the station as a tall building zone (7-8 storeys), with a mid-rise zone buffer (5-6 storeys)" from the paragraph which starts: "The Urban Design Study identifies "

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Email Address	[REDACTED]
Address	[REDACTED]
Event Name	Local Plan Publication Consultation June 2023
Comment by	Louise Fluker (1338297)
Comment ID	16
Response Date	20/07/23 00:16
Consultation Point	Policy 4 Minimising Greenhouse Gas Emissions and Promoting Energy Efficiency (Strategic Policy) (View)
Status	Submitted
Submission Type	Web
Version	0.1

Part(s) of Local Plan responding to

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Sustainability Appraisal Report - Page number(s) / Paragraph number(s)

Other (for example an omission or alternative approach)

Policy 4 -Minimising Greenhouse Gas Emissions and Promoting Energy Efficiency (Strategic Policy)

Legal Compliance, Soundness and Duty to Co-operate

Do you consider the Local Plan is:

Legally Compliant	.	Yes
Sound	.	No
Complies with the Duty to Co-operate	.	Yes

Reason Consider Unsound

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

Effective

Details of reason(s) for representation

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Policy 4 does not mention retrofitting existing housing stock or buildings although Policy 3 refers to the importance of this.

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Policy 4 requires a statement by the Council regarding its position and policies on retrofitting existing buildings

Participation at Examination

Do you consider it necessary to participate in examination hearing session(s)?

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Email Address	[REDACTED]
Address	[REDACTED]
Event Name	Local Plan Publication Consultation June 2023
Comment by	Louise Fluker (1338297)
Comment ID	19
Response Date	20/07/23 00:25
Consultation Point	26.5 Paragraph (View)
Status	Submitted
Submission Type	Web
Version	0.1

Part(s) of Local Plan responding to

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

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Publication Local Plan (including changes to the Policies Map designations) - Page number(s) / Paragraph number(s) / Policy no./name / Place-based strategy / Site Allocation(s) no./ name / Maps / Tables

Sustainability Appraisal Report - Page number(s) / Paragraph number(s)

Other (for example an omission or alternative approach)

26.5

Legal Compliance, Soundness and Duty to Co-operate

Do you consider the Local Plan is:

Legally Compliant	.	Yes
Sound	.	No
Complies with the Duty to Co-operate	.	Yes

Reason Consider Unsound

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

. Effective

Details of reason(s) for representation

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There is a disconnect in that it is not clear how this will apply to existing housing stock and existing buildings and there is no reference to retrofitting

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Council will need to develop policies which relate to retrofitting whether insulation, heat systems or water collection

Participation at Examination

Do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing session(s)

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Email Address	[REDACTED]
Address	[REDACTED]
Event Name	Local Plan Publication Consultation June 2023
Comment by	Louise Fluker (1338297)
Comment ID	21
Response Date	20/07/23 00:20
Consultation Point	19.62 Paragraph (View)
Status	Submitted
Submission Type	Web
Version	0.1

Part(s) of Local Plan responding to

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

Please indicate the documents(s) and part(s) you are commenting on.

Publication Local Plan (including changes to the Policies Map designations) - Page number(s) / Paragraph number(s) / Policy no./name / Place-based strategy / Site Allocation(s) no./ name / Maps / Tables

Sustainability Appraisal Report - Page number(s) / Paragraph number(s)

Other (for example an omission or alternative approach)

Para 19.62

Legal Compliance, Soundness and Duty to Co-operate

Do you consider the Local Plan is:

Legally Compliant

Sound . No

Complies with the Duty to Co-operate

Reason Consider Unsound

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

. Effective

Details of reason(s) for representation

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Applications for very tall monopoles (15m-25m) are, in the wrong setting, very obtrusive. Verified visuals would assist the local community in interpreting the effect on the surrounding areas

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Add "the provision of verified visuals"

Participation at Examination

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Email Address	[REDACTED]
Address	[REDACTED]
Event Name	Local Plan Publication Consultation June 2023
Comment by	Louise Fluker (1338297)
Comment ID	22
Response Date	20/07/23 00:13
Consultation Point	Policy 3 Tackling the Climate Emergency (Strategic Policy) (View)
Status	Submitted
Submission Type	Web
Version	0.1

Part(s) of Local Plan responding to

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Publication Local Plan (including changes to the Policies Map designations) - Page number(s) / Paragraph number(s) / Policy no./name / Place-based strategy / Site Allocation(s) no./ name / Maps / Tables

Sustainability Appraisal Report - Page number(s) / Paragraph number(s)

Other (for example an omission or alternative approach)

Policy 3 Para D

Legal Compliance, Soundness and Duty to Co-operate

Do you consider the Local Plan is:

Legally Compliant

Sound **No**

Complies with the Duty to Co-operate

Reason Consider Unsound

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

Details of reason(s) for representation

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The Policy does not acknowledge that existing buildings are old, energy and water inefficient and that the emissions and other targets will not be met without retrofitting existing buildings

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Amend Para D to read:

The Council will work with partners and local communities to improve the energy and water efficiency of the existing building stock and wider public realm, with a particular focus on increasing energy and water efficiency of homes and businesses, especially improved insulation in lofts, walls and floors.

The Council's Carbon Offset Fund will be used to implement projects to reduce carbon emissions and water savings across the borough.

Participation at Examination

Do you consider it necessary to participate in examination hearing session(s)?

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Comment

Consultee	Louise Fluker (1338297)
Email Address	[REDACTED]
Address	[REDACTED]
Event Name	Local Plan Publication Consultation June 2023
Comment by	Louise Fluker (1338297)
Comment ID	11
Response Date	22/07/23 18:32
Consultation Point	3.2 Paragraph (View)
Status	Submitted
Submission Type	Web
Version	0.1

Part(s) of Local Plan responding to

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

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Publication Local Plan (including changes to the Policies Map designations) - Page number(s) / Paragraph number(s) / Policy no./name / Place-based strategy / Site Allocation(s) no./ name / Maps / Tables

Sustainability Appraisal Report - Page number(s) / Paragraph number(s)

Other (for example an omission or alternative approach)

Para 3.2 Local Plan Strategic Vision 'The best for our borough'

Legal Compliance, Soundness and Duty to Co-operate

Do you consider the Local Plan is:

Legally Compliant

Sound No

Complies with the Duty to Co-operate

Reason Consider Unsound

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

Justified

Details of reason(s) for representation

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The Strategic Vision refers to the 20 minute community with everything in reach within 20 mins of either walking or cycling. However there is a significant difference between the distance travelled by a cyclist and a pedestrian. The draft Plan should be clearer as to what is meant. The point is significant because the evidence referred to states that Richmond has an ageing population. The elderly or those with mobility issues may not be physically able to walk let alone cycle

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This is a matter of clarification - i.e. the text should refer either to 20 minutes walking or 20 minutes cycling

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Consultee	Louise Fluker (1338297)
Email Address	[REDACTED]
Address	[REDACTED]
Event Name	Local Plan Publication Consultation June 2023
Comment by	Louise Fluker (1338297)
Comment ID	12
Response Date	22/07/23 18:32
Consultation Point	3.3 Paragraph (View)
Status	Submitted
Submission Type	Web
Version	0.1

Part(s) of Local Plan responding to

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

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Publication Local Plan (including changes to the Policies Map designations) - Page number(s) / Paragraph number(s) / Policy no./name / Place-based strategy / Site Allocation(s) no./ name / Maps / Tables

Sustainability Appraisal Report - Page number(s) / Paragraph number(s)

Other (for example an omission or alternative approach)

3.3 Create 20-minute neighbourhoods that make it easier to be physically active; enhance opportunities for walking and cycling safely; create high quality public spaces and public realm; improve connectivity and accessibility for all; and focus on supporting the high streets, centres and parades as destinations that people want to go to and use to 'live locally'

Legal Compliance, Soundness and Duty to Co-operate

Do you consider the Local Plan is:

Legally Compliant	.	Yes
Sound	.	No
Complies with the Duty to Co-operate	.	Yes

Reason Consider Unsound

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

. Justified

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Whilst the emphasis on encouraging fitness is laudable, the strategic objective ignores (a) the evidence cited by the Council of an ageing population (b) elderly people tend to have greater mobility issues and (c) are therefore unlikely to be able to walk within a 20 minute cycle ride, let alone cycle!

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Include after " improve connectivity and accessibility for all" the words "including those with mobility issues"

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Email Address	[REDACTED]
Address	[REDACTED]
Event Name	Local Plan Publication Consultation June 2023
Comment by	Louise Fluker (1338297)
Comment ID	13
Response Date	22/07/23 18:36
Consultation Point	Policy 1 Living Locally and the 20-minute neighbourhood (Strategic Policy) (View)
Status	Submitted
Submission Type	Web
Version	0.1

Part(s) of Local Plan responding to

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Sustainability Appraisal Report - Page number(s) / Paragraph number(s)

Other (for example an omission or alternative approach)

Policy 1 paras 1,2 and 3

Legal Compliance, Soundness and Duty to Co-operate

Do you consider the Local Plan is:

Legally Compliant	.	Yes
Sound	.	No
Complies with the Duty to Co-operate	.	Yes

Reason Consider Unsound

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

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The draft Plan ignores in a practical way the needs of residents or visitors who are not mobile (thus ignoring the point also made in the Plan that the borough's population is ageing). Someone in a wheelchair can neither cycle nor walk and even using public transport is difficult. Likewise some people with mobility issues may not be eligible for a blue badge. There is no acknowledgment that such persons might need to drive or be driven

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In Policy 1B add at the end " with adequate provision for those with mobility issues"

Participation at Examination

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No, I do not wish to participate In hearing session(s)

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Comment

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Email Address	[REDACTED]
Address	[REDACTED]
Event Name	Local Plan Publication Consultation June 2023
Comment by	Louise Fluker (1338297)
Comment ID	17
Response Date	22/07/23 18:41
Consultation Point	18.17 Paragraph (View)
Status	Submitted
Submission Type	Web
Version	0.1

Part(s) of Local Plan responding to

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

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Sustainability Appraisal Report - Page number(s) / Paragraph number(s)

Other (for example an omission or alternative approach)

18.17

Legal Compliance, Soundness and Duty to Co-operate

Do you consider the Local Plan is:

Legally Compliant	.	Yes
Sound	.	No
Complies with the Duty to Co-operate	.	Yes

Reason Consider Unsound

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

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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.*

Draft Plan does not recognise the need for retailers to have deliveries which in many instances will need to be by a vehicle. In addition as more commercial premises are converted to residential units without parking provision it is likely that these residents will rely on deliveries by couriers so the number of such deliveries will increase significantly.

Modification(s) consider necessary

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 in the question 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.*

Add to the end of the sentence "18.17 Focusing development in the town centres will result in sustainability benefits, including a reduction in the need to travel by car" the words "(accepting that deliveries to retailers and residents will continue to be made by vehicles)".

Participation at Examination

Do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing session(s)

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.