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**From:** [REDACTED]  
**Sent:** 23 July 2023 20:43  
**To:** Richmond Local Plan  
**Subject:** CONSULTATION ON THE LOCAL PLAN - RESPONSE ON BEHALF OF WHITTON  
COMMUNITY ASSOCIATION  
**Attachments:** 230724 - WCA local\_plan\_publication\_consultation\_response\_form.docx

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<https://aka.ms/LearnAboutSenderIdentification> ]

Hello

I attach a response on behalf of the trustees of Whitton Community Association to the current round of consultation on the Local Plan.

Best wishes.

Nick Dexter



## 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](http://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](mailto: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.

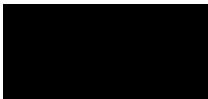



Alternatively, you can make comments on the draft Local Plan **online via our Consultation Portal**, which is accessible at the website listed above.

**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	Nick	
Last name	Dexter	
Job title (where relevant)	Trustee	
Organisation (where relevant)	Whitton Community Association	
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](http://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 checked="" type="checkbox"/>	Page number(s)	108, 110, 100, 109
		Paragraph number(s)	
		Policy no./name	49/Social and Community Infrastructure; 11/Affordable Housing
		Place-based strategy	9 Whitton & Heathfield
		Site Allocation(s) no./ name	22
		Maps	
		Tables	
Sustainability Appraisal Report	<input type="checkbox"/>	Page number(s)	
		Paragraph number(s)	
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 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 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](http://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 type="checkbox"/>
5.2 Justified	<input type="checkbox"/>
5.3 Effective	<input checked="" type="checkbox"/>

5.4 Consistent with national policy

**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.***

We consider that the Local Plan will not achieve its aims for the borough unless it is clarified in the way we envisage.

#### Introduction

These comments are made on behalf of the trustees of WCA.

There are two areas where we are seeking reassurance about the drafting of the Local Plan in the absence of which we are concerned that it will not achieve the stated policy aims for the borough and so might be unsound: the “Mixed Development” option; and the “100% Affordable Housing” option.

We also offer some “Minor Corrections” to the Local Plan.

#### The “Mixed Development” Option

Site allocation 22 (page 108) proposes a mixed development of affordable housing and community use in any redevelopment of the existing Whitton Community Centre building (“WCC”). WCA does not have, and is not likely to have, access to funds sufficient to rebuild the WCC building when it is no longer fit for purpose. The Council are more likely to allocate funds for the re-provision of the building as part of a mixed development with affordable housing.

However, the Local Plan is silent on how affordable housing will be combined with community use. This will need careful consideration. We would want to be reassured that the Local Plan as drafted would allow us, in any planning application, to raise issues such as: access; parking; sound insulation; rubbish /recycling; and security cameras and outside lighting. We need to be open seven days a week at what might be considered unsocial hours.

WCC is unique in the Whitton/Heathfield area in having the Lambeth Hall which is 13m x 13m, approximately 4.4metres in height, and seats 150 guests. The hall is regularly let out until midnight on a Friday and Saturday. There is also the Fox room (65 guests) and the Trimble Lounge (80 guests). We would want to be reassured that the Local Plan as drafted would enable us to provide an equivalent level and variety of space. And this would need to be, as now, all on the ground floor, accessible to all.

The WCC building currently meets the Local Plan’s broad strategy for development that buildings should be adaptable and capable of multiple uses. The current building is certainly that. There are currently over 60 small business, activity sessions, charities, clubs, associations and support groups that call Whitton Community Centre their home. With at least 10 more that use us regularly once or twice a year. We would want to be assured that the Local Plan as drafted would not prevent us achieving the equivalent provision.

And we would need to make provision during any temporary closure of the centre for these businesses/clubs to be able to continue. Without alternative accommodation they would face closure.

#### The “100% Affordable Housing” option

The first bullet point on page 110 references Local Plan Policy 49 Social and Community Infrastructure which proposes that should a scheme come forward for redevelopment or change of use to 100% genuinely affordable housing, in accordance with Policy 11 Affordable Housing in terms of mix, tenure and affordability, then it would not need to be considered for alternative social infrastructure use nor marketing evidence submitted. In those circumstances, a wholly affordable housing scheme would be supported. The bullet point goes on to state, “However, on this site the Council is seeking affordable housing with community/social infrastructure, due to the need to reprovide the existing use”. We would want to be assured that, should a 100% affordable housing scheme be proposed, that the Local Plan as drafted would require that scheme to be considered but once considered could then be rejected.

#### “Minor Corrections”

On page 100, the last paragraph, WCC is referred to as a “day centre”. This should be corrected to “community centre, food bank and pharmacy”.

On page 109, at “Access to Open Space/Nature”, the second bullet point wrongly refers to Kew Gardens Station etc.

On page 109, at “Description of Current Site Character”, WCC is referred to as a “part single, part two storey” building. But the building is all single storey. The correct description would be, “Whitton Community Centre is a single storey building with a double height hall to the rear. “Food bank” should be added to the list of activities and the description of the user group should be, “aimed at the whole community, men and women, of all ages from small children to senior citizens”.

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.***

On page 100, in the last sentence beginning, "At Whitton Community Centre . . ." amend the phrase "(the existing day centre and pharmacy)" to read "(the existing community centre, food bank, and pharmacy)"

On page 108, in the first bullet point, in the last sentence beginning, "However, . . .", delete, "is seeking", and insert, "will provide"

On page 108, add a bullet point, " Any planning application should safeguard the interests of all stakeholders concerned, including specific matters relating to combining community and residential use at this site."

On page 109, in the right hand column, second bullet point, amend as appropriate to refer to Whitton High Street and not Kew Gardens Station, Kew Green and Sandycombe Road

On page 109, alongside "Description of Current Site and Character" and the description of Whitton Community Centre to read, "Whitton Community Centre is a single storey standalone building with a large, double height hall to the rear, accessed from the . . .". And in the sentence beginning, "The community centre is run . . .", delete the words "and activities/services and the rest of the sentence, and replace by, ", activities/services, and including a food bank, aimed at the whole community, men and women, of all ages from small children to senior citizens."



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)**

<b>No</b> , I do not wish to participate In hearing session(s)	<input type="checkbox"/>	<b>Yes</b> , I wish to participate In hearing session(s)	<input checked="" 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.*

To press for clarification of the points we have made.

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:

Nick Dexter

*For electronic responses a typed signature is acceptable.*

Date:

24 July 2023