

Our ref: PL00029357

By email:

RichmondLocalPlan@richmondandwandsworth.gov.uk

14 March 2025

Dear Sir/Madam

London Borough of Richmond upon Thames – Consultation on Proposed Main Modifications to the Local Plan

Thank you for consulting Historic England about the Proposed Modifications to the London Borough of Richmond upon Thames Local Plan. We have the following comments to make on the suggested changes to the Plan.

Firstly, we welcome a number of corrections and clarifications made in response to our comments during the Regulation 19 consultation, as reflected in our Statement of Common Ground with the Council. For example, a reference to early consultation with the Greater London Archaeology Advisory Service (GLAAS) at paragraph 20.56 of the Plan (Modification MM63).

Secondly, we broadly welcome changes to Policy 45 of the Plan (Tall and Mid-Rise Building Zones) and associated supporting text, maps and appendices (Modifications MM73, MM74, MM87, MM88). These address points that we raised during the Regulation 19 consultation by reducing ambiguity. The changes are also therefore helpful, to some extent, in relation to site allocations on which we also commented.

However, in relation to Policy 32 Kew Gardens, to which no modifications are proposed, we continue to stress the importance of requiring that development proposals that would have an impact on the World Heritage Site are subject to an impact assessment using the [Unesco Guidance and Toolkit](#). On relevant cases, this assessment should be submitted in support of an application. At present, paragraph 20.52 of the supporting text of the Plan alludes to this guidance, but lacks clarity and represents a commitment by the Council, rather than a responsibility to be discharged by applicants.

We note the correction to Policy 28 to clarify that a programme for prioritising review of the Council's Conservation Area Appraisals has ended (MM59). While this is not a soundness issue for the Local Plan, it is nevertheless a cause for regret. We encourage the Council to



maintain the momentum on updates to these important evidence base documents to inform management and decision making in historic places.

If you have any queries about any of the matters raised or consider that a meeting would be helpful, please do not hesitate to contact me.

Yours sincerely

Kim Miller MRTPI IHBC

Historic Environment Planning Adviser

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