

LBRuT analysis of all responses received on the consultation of the draft Local Views SPD (22 July to 5 September 2022)

Please note, the responses below are exactly as received from the respondents and have not been edited by the Council. They are not alphabetically ordered or in any other order of priority.

Respondent reference no.	Name/Organisation
1.	Petra sturton
2.	Ludovic Leforestier
3.	Joe P
4.	Emma van Rooyen
5.	Mike McCutcheon
6.	Michael Winsor
7.	Nuala Orton
8.	Fay SI Johnstone
9.	Matt Hitchmough
10.	Barbara Hodgson
11.	Brandan Holmes
12.	Judith Anderton
13.	Diamantina Harrington
14.	Alistair Johnston
15.	Neil Maybin
16.	Deborah Sayer
17.	Simon BatcheloR
18.	J Langrish
19.	Michele Livesey
20.	Sandria Lewindon
21.	Ingrid Hinton
22.	Sam Martin
23.	Lachlan John Finlayson
24.	Rosalind Graham Hunt
25.	Suzannah Herbert
26.	John Keefe (Dr.)
27.	Juliet Mills
28.	Annette Nienhaus
29.	Roderick Ellis
30.	Andrew Hall
31.	Desmond Curran
32.	Nigel Muir
33.	Nigel Griffin



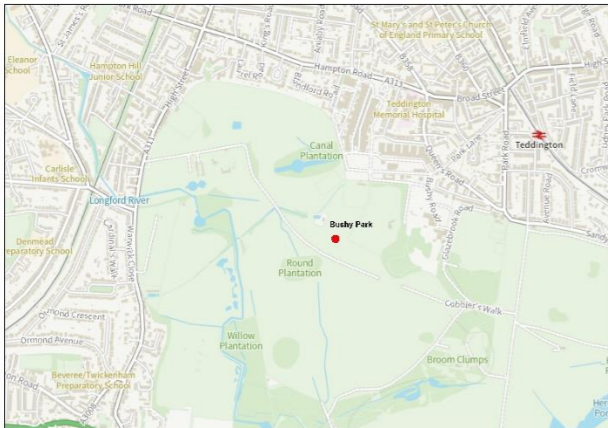
34.	John Waxman, Crane Valley Partnership
35.	D Collins
36.	Gary Backler, Friends of the River Crane Environment (FORCE)
37.	Juliet Bramwell
38.	Anna Newton Dun
39.	Mrs Hilary Pereira, Upper Tideway branch, River Thames Society
40.	Prasad Shastri
41.	Christie Fidura
42.	Tina Bucklow-Waas, Ham and Petersham Neighbourhood Forum
43.	Tom Haworth
44.	Louise Fluker, The Richmond Society
45.	Cllr Nancy Baldwin
46.	Judith Pearson, The Friends of Richmond Park
47.	London Borough of Hounslow
48.	Natural England (no comments)
49.	Transport for London (TfL) (no comments)
50.	National Highways (no comments)
51.	Surrey County Council (no comments)
52.	Graeme Fraser-Watson, Teddington Society
53.	Mark Knibbs, Avison Young on behalf of St George Plc and Marks and Spencer Group Plc
54.	Katie Parsons, Historic England
55.	Paul Velluet
56.	Martha Bailey, London Historic Parks and Gardens Trust
57.	Peter Willan, Old Deer Park Working Group
58.	Peter Willan, Friends of Richmond Green
59.	Tim Catchpole, Mortlake with East Sheen Society
60.	Ajit Gill, Environment Agency
61.	RBG Kew
62.	Hampton Sailing Club
63.	The Royal Parks


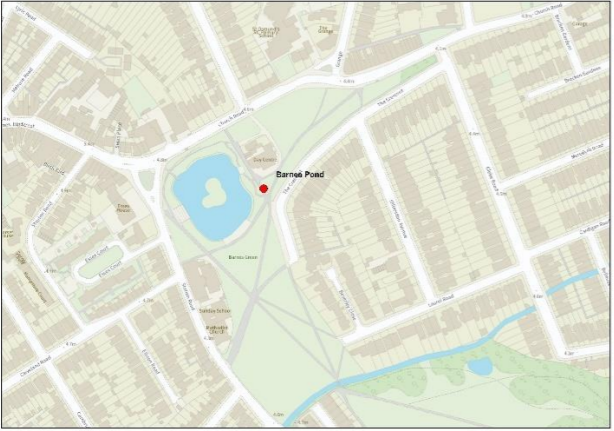

Comments were received from 63 respondents. Respondents included a range of residents and amenity groups, organisations and statutory consultees. The questionnaire that could be used to respond to the consultation asked about the main capacity in which they were responding to the consultation. Of respondents who answered this question (with any duplicate removed if respondents completed the questionnaire more than once), 38 said they live in the local area, 7 were responding on behalf of a local group or organisation, and 2 work/study in the area.

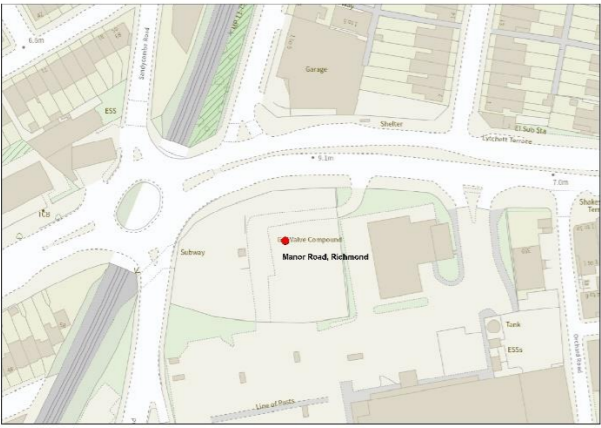


We received comments from 44 respondents on-line through the Council's Consultation Portal, and a further 19 respondents sent comments by email.



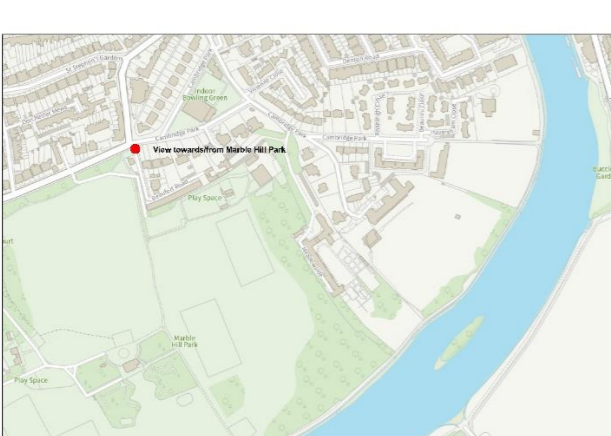
All of the comments received have been collated into two tables below – comments on specific views, followed by comments on view management and guidance and any general comments.


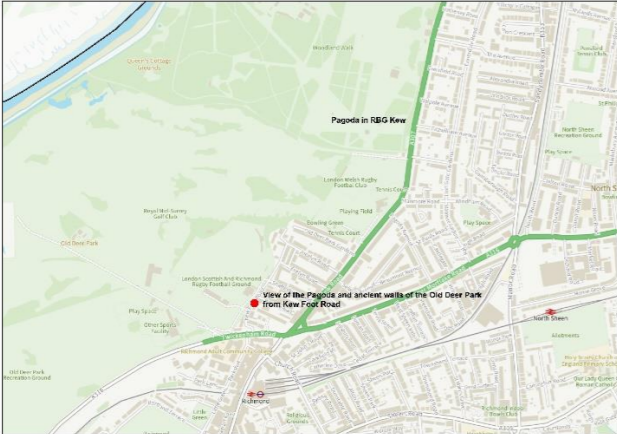

Comments on specific views




Name / Organisation	View location (from map or name)	Please provide any detailed comments on the specific view you selected	Is the specific local view you've told us about already covered in the SPD?	Please specify the type of view – Prospect, Linear or Townscape	Please describe how this view can be appreciated by the public, and how it could be harmed if it is at risk of development	Any other supporting or additional information submitted (in relation to general points)
Alistair Johnston	 <p><i>Mortlake Crematorium</i></p>	The view of this bend in the Arcadian Thames, looking down river.... It would a huge shame to spoil this with a 10 storey development that belongs in central London ...	No	Prospect	By looking over the bridge or walking along the river The massive bulk of the Brewery development would totally change the Arcadian feel of this special stretch of the Thames ..	
Andrew Hall (1)	 <p><i>Twickenham Green</i></p>	Wide view of the whole of Twickenham Green from the former toilets (Arthur's) towards the line of trees alongside First Cross Road	No	Prospect	Can be viewed from anywhere on or around the Green - the existing view looks across the green whereas this one covers the length of it and takes in its most noticeable natural feature (the prominent line of trees)	
Andrew Hall (2)	 <p><i>Bushy Park</i></p>	View from the new Teddington CC pavilion across the sports pitches in Bushy Park	Blank	Blank	Blank	

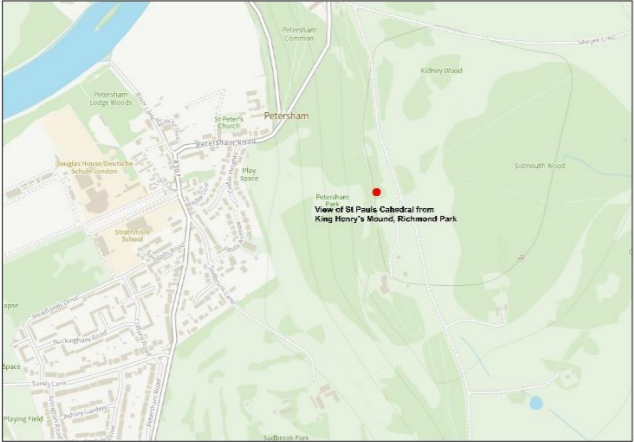

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Anna Newton Dun	 <p><i>The Lanes, Richmond</i></p>	I am disappointed by the very few views listed in Richmond Town centre. There are historic and beautiful views of some of the oldest and most picturesque places such as Old Palace Lane, (one of the oldest lanes) Brewers Lane, Paved Court. I hope at least these three will be considered for inclusion thought there are others e.g. the view of the Henry VII gate into the former Tudor Palace.	No	Prospect	I can't imagine there is much scope for development in any I listed but planning laws change and the views need protection.	
Christie Fidura (1)	 <p><i>Barnes Pond</i></p>	The view of Barnes Pond with Barnes High Street in the background.	No	Townscape	This is the quintessential vista of central Barnes and it must be protected from any development along the High Street.	
Christie Fidura (2)	 <p><i>The Terrace, Barnes</i></p>	The view west up river from the White Hart pub.	Blank	Blank	Blank	

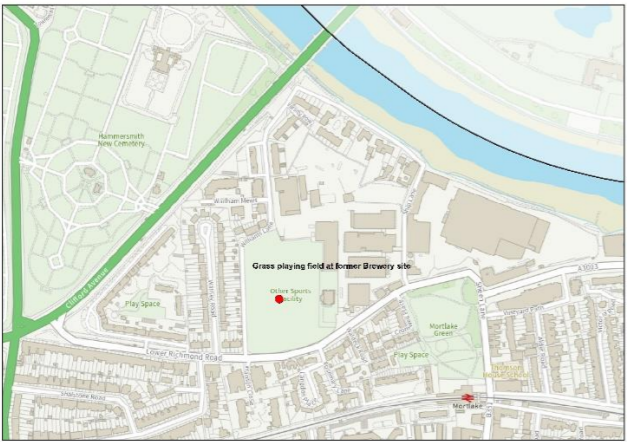
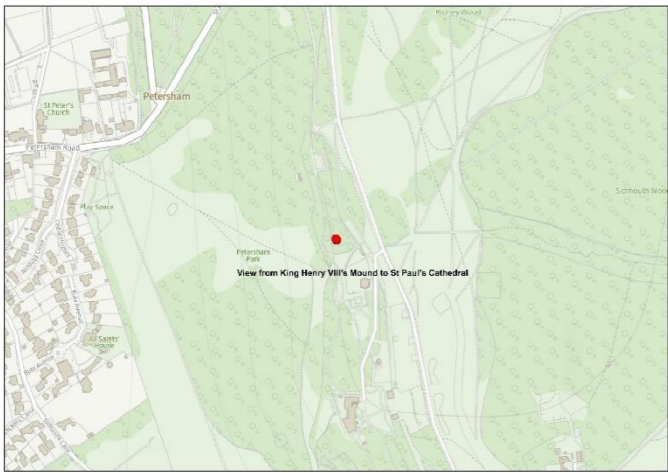

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D Collins	 <p data-bbox="278 867 552 898"><i>Manor Road, Richmond</i></p>	<p data-bbox="973 443 1659 642">When walking down Manor Road from Manor Circus, in the view over the current Homebase site you can see Richmond Hill with the spire of St Matthias Church in the distance. This view will be completely obliterated by the proposed new ugly oversized development planned for the Homebase site. No one living in the vicinity wants this new ugly blot on the local landscape</p>	No	Linear	<p data-bbox="1997 443 2347 667">This view will be completely obliterated by high rise blocks in an area of predominately 2 and 3 storey houses. Many local residents comment how nice it is to be able to see the spire of St Matthias on the top of Richmond Hill</p>	
Deborah Sayer (1)	 <p data-bbox="278 1329 418 1360"><i>Ham Lands</i></p>	<p data-bbox="973 905 1659 1066">Ham Lands provide an uninterrupted, unspoilt view both from Twickenham and Ham. They provide clean air and dark skies and habitats for animals who need a dark sky. They provide a breathing space between the urban centres of west London. This view provides a physical and psychological breathing space for humans and animals.</p>	No	Prospect	<p data-bbox="1997 905 2347 1129">At the moment, the view from Twickenham across to Ham is dark at night. It is peaceful and quiet. Any development on the Ham, Surrey bank would, inevitably cause light pollution as well as possible noise pollution.</p>	
Deborah Sayer (2)	 <p data-bbox="278 1791 575 1822"><i>Diamond Jubilee Gardens</i></p>	<p data-bbox="973 1367 1659 1570">At present, the view from the Embankment is of open spaces and low rise buildings. The proposed development of this site risks turning it into a high rise high density environment. At present, many people go to the embankment every day to seek peace and quiet and escape from the busy urban world. The proposed development risks destroying this oasis of calm forever.</p>	Blank	Blank	Blank	
Desmond Curran		<p data-bbox="973 1829 1659 1936">I believe that Ham Common itself (including Ham Pond and the grand houses surrounding the Common) should be included as an additional Townscape view. I see that Richmond Green is correctly listed as a Townscape view,</p>	No	Townscape	<p data-bbox="1997 1829 2347 1913">Similar to the report's treatment of the Richmond Green view.</p>	

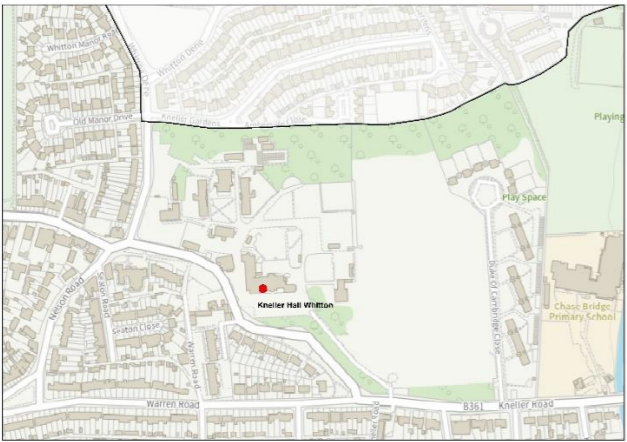
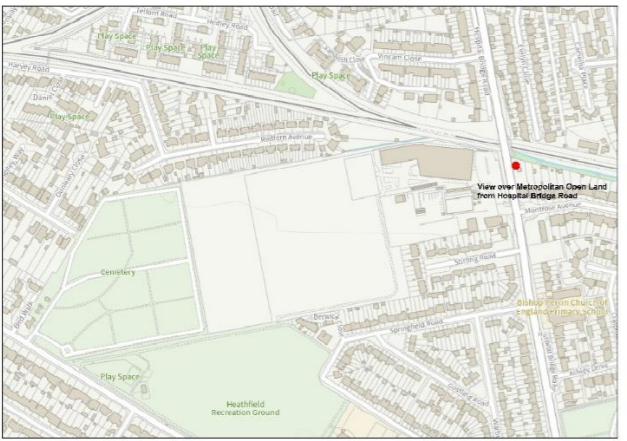
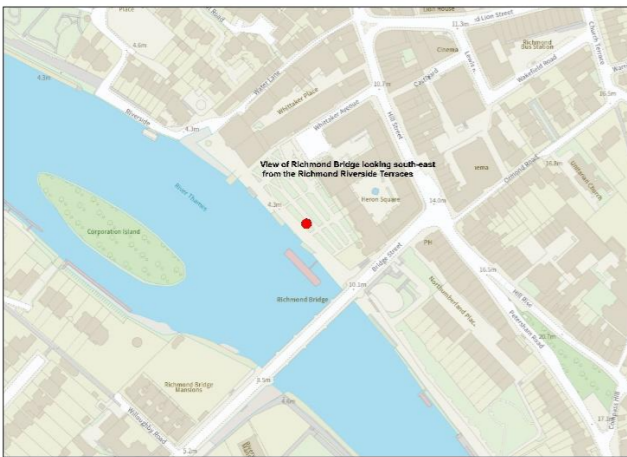

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	 <p data-bbox="278 869 448 898"><i>Ham Common</i></p>	<p data-bbox="970 443 1656 583">and I believe the case for including Ham Common/Ham Pond is similar and equally strong. (Ham Common is referred to in the panoramic listing of South Avenue from Ham House but only peripherally - it deserves to be included on its own merits.)</p>				
Fay SI Johnstone	 <p data-bbox="278 1331 961 1402"><i>Views over parks from Richmond Canoe Club/Three Pigeons/Blade House</i></p>	<p data-bbox="970 905 1656 961">View over parks next to Richmond Canoe Club/Three Pigeons/Blade House should not be built on</p>	No	Prospect	Walking by river	
Ingrid Hinton (1)	 <p data-bbox="278 1835 961 1898"><i>View towards/from Marble Hill Park</i></p>	<p data-bbox="970 1409 1656 1465">This is a dominant street view around the church going to it and from it to the park with the pub on the right</p>	No	Townscape	<p data-bbox="1991 1409 2347 1717">It has a lovely little gardeners cottage in the grounds, there are long front gardens to the houses near it and the pub is directly on the road with seating around it. If any of these things alter the appreciation of the space there and the buildings in that area will significantly be to the detriment of the community</p>	


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Ingrid Hinton (2)	 <p>Orleans Road, Twickenham towards the River Thames</p>	As you walk down Orleans road it is a road of significant diversity history and builds excitement as you walk towards the Thames. The view is vulnerable due to potential development of any of the buildings down that road and in the grounds of Orleans house backing over to the school	Blank	Blank	Blank	
J Langrish	 <p>View of the Pagoda and ancient walls of the Old Deer Park from the Kew Foot Road</p>	View of the Pagoda and ancient walls of the Old Deer Park from the Kew Foot Road.	No	Prospect	It can be appreciated by walking up the Kew Foot Road towards Kew. Development could harm or impede the view.	
Joe P	 <p>View from Richmond Hill</p>	A beautiful and historic view, from Turner's day until now - there should be no development that in anyway impedes or effects this view, which is greatly enjoyed by locals and visitors alike.	Yes	Blank	Blank	



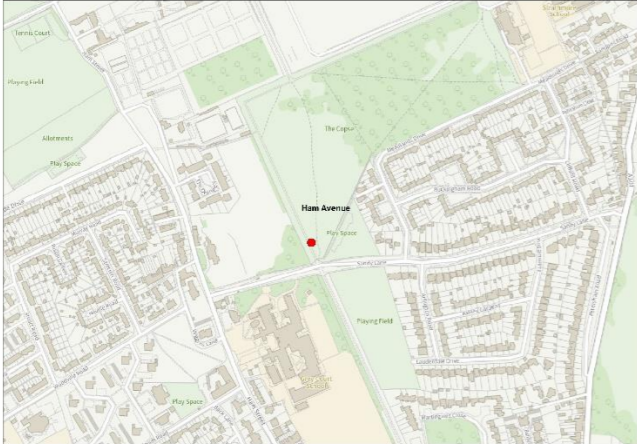
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Judith Anderton	 <p><i>View from the Embankment, Twickenham</i></p>	a delightful view & one I visit frequently. A lovely place to sit & watch the river with its waterfowl and river craft drift by	Yes	Blank	Blank	
Juliet Bramwell (1)	 <p><i>Richmond Riverside</i></p>	Friars Lane car park is unsightly and in poor repair. Please can you expedite the proposed landscaping improvements including larger bins and adding a few resident parking bays.	No	Townscape	Friars Lane is a gateway from Richmond to the riverside and many people either use the car park or walk past it	
Juliet Bramwell (2)	Please see map above <i>Richmond Riverside</i>	the railings along the river are in poor repair	Blank	Blank	Blank	
Juliet Mills		I would like to see the Ham Lands included in this planning document. This nature reserve site needs protection from the repeated planning submissions for mobile phone masts. So far these have been rejected by the Council but there is another one pending right now. Viewing the area from the riverside path at Thames Young Mariners one would see the proposed mast on Riverside Drive at the road entrance to Thames Young Mariners. Of course one would also see it from most other parts of Ham Lands, and it would be very out of keeping with the natural beauty of this SSSI.	No	Prospect	Already explained in previous 'box'	




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	<i>Thames Young Mariners, Ham Lands</i>					
Lachlan John Finlayson	 <p data-bbox="284 947 884 1003"><i>View of St Paul's Cathedral from King Henry's Mound, Richmond Park</i></p>	<p data-bbox="973 472 1656 646">"St Paul's view. The view, although protected has been damaged, at the very least greatly diminished in recent years with a tall apartment building being built behind St Pauls. This should not have happened and should be remembered in future when protecting other views."</p>	Yes			
Ludovic Leforestier	 <p data-bbox="284 1455 617 1480"><i>Hammersmith New Cemetery</i></p>	<p data-bbox="973 1012 1656 1066">The mortlake historic riverside is at threat of a unsympathetic redevelopment.</p>	Yes	Blank	Blank	
Michael Winsor	<p data-bbox="284 1488 961 1543">View looking from ham common to ham house down the footpath .. it's a great view</p>	<p data-bbox="973 1488 1656 1543">It's a wonderful long sight line from ham common to ham house</p>	No	Linear	It's walking along the path from ham common to the river	


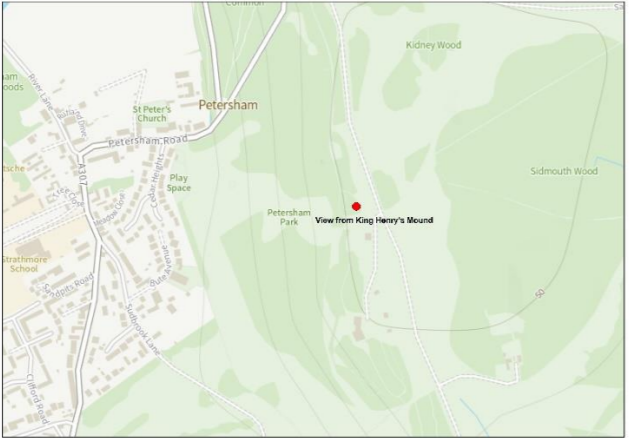
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Mike McCutcheon	 <p data-bbox="284 884 744 911"><i>Grass playing field at former Brewery site</i></p>	<p data-bbox="976 443 1635 695">The grass playing at the former brewery site need preserving. That whole brewery site should be developed into pleasant publicly-owned housing with OPEN SPACES for nature but also for normal local people to grow up, play sport and enjoy their lives in spacious serenity in clean air. STOP allowing Singaporean investors from making a fortune by clogging up the whole area. Don't build a school so Richmond can import pupils from Hammersmith, Wandsworth and Hounslow boroughs.</p>	No	Prospect	<p data-bbox="2000 443 2347 583">The public play on the playing fields. The locals look out over the pitches and enjoy them when they are being played on or when they are empty.</p>	
Neil Maybin	 <p data-bbox="284 1388 923 1415"><i>View from King Henry VIII's Mound to St Paul's Cathedral</i></p>	<p data-bbox="976 917 1635 1031">"The view from King Henry VIII's Mound to St Paul's Cathedral, reference (E3.1). As you have stated, this is a protected view in the LVMF under the London Plan (2021) and previous London plans.</p> <p data-bbox="976 1058 1635 1226">As you are aware, London Plan Policy 7.12 states that a silhouette of a World Heritage Site is identified that is prominent in a townscape or river prospect, and well preserved within its setting with clear sky behind it, it should not be altered by new development appearing in its background.</p> <p data-bbox="976 1253 1635 1457">Around 2015 a development next to Stratford International station, Manhattan Loft Gardens, was built. As a result of this, the view of St Paul's from King Henry VIII's Mound was and remains significantly damaged. It appears that in approving this the GLA failed to perceive the impact that a development of that size would have almost five miles beyond the line of sight of the view.</p> <p data-bbox="976 1484 1635 1709">The Council should be pressing for conditions in the next London Plan to ensure that there can be no alterations to the Manhattan Loft Gardens buildings other than those that reduce or eliminate their impact on this view. Specifically, if at some (probably distant) future date redevelopment is proposed for the site, then the existing buildings should not be relied on as a precedent and any new buildings must avoid impacting this view."</p>	Yes	Blank	Blank	<p data-bbox="2362 917 2754 945">Add supporting information (photo)</p> 

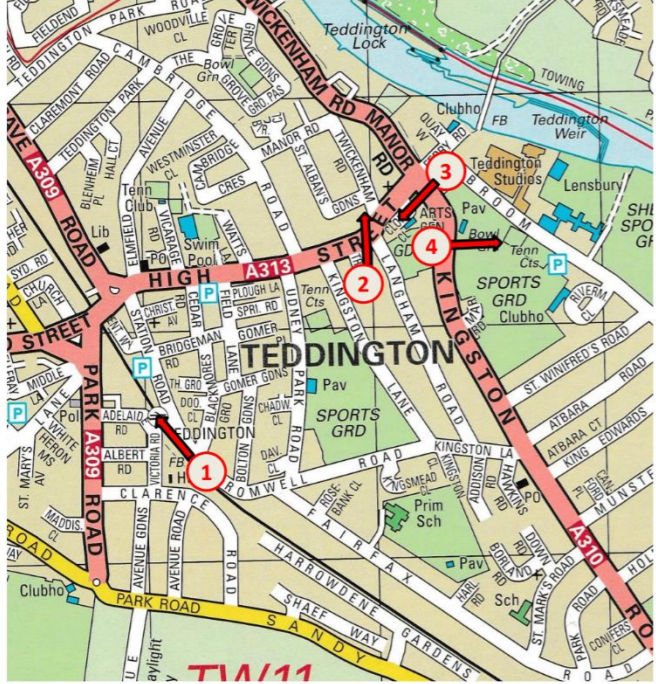


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Nigel Griffin (1)	 <p>Kneller Hall, Whitton</p>	<p>"The view of Kneller Hall is an important element of Old Whitton. There are currently no views in Heathfield or Whitton wards thought worthy of protection."</p>	No	Townscape	Could be harmed by unsympathetic development	
Nigel Griffin (2)	 <p>View over Metropolitan Open Land from Hospital Bridge Road</p>	<p>Before the development of Turing House School this afforded a view over a Metropolitan Open Space destroyed by an unholy alliance of Conservative, Liberal and Labour politicians.</p>	Blank	Blank	Blank	
Nigel Muir	 <p>View of Richmond Bridge looking south-east from the Richmond Riverside Terraces</p>	<p>With reference to the views of Richmond Bridge, the Draft Supplementary Planning Document does not include the view of Richmond Bridge looking south-east from the Richmond Riverside Terraces. This is a very high traffic area, with many people walking along the towpath here, and many sitting on the terraces. Since May 2022 the view of Richmond Bridge from the terraces and towpath has been almost completely obscured by the new Peggy Jean restaurant, with its massive and rather garish umbrellas. Prior to May 2022 Richmond Bridge could be clearly seen over the floating Turks pontoon. It would be interesting for Richmond Planning to review whether the new structures built on the pontoon are within the planning consent, as they appear significantly larger and higher than allowed according to any previous planning document that I have been able to find. "</p>	Yes	Blank	Blank	<p>Add supporting information (photos)</p> 

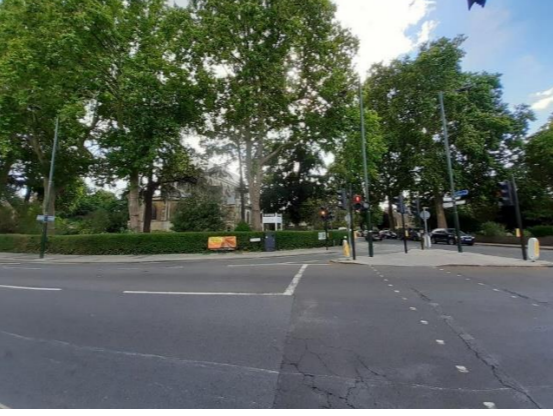

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	View of Richmond Bridge looking south-east from the Richmond Riverside Terraces					

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Roderick Ellis	 <p>View in and around open land at Cross Deep and Radnor Gardens</p>	<p>“Historic views in and around this treasured stretch of open land at Cross Deep and Radnor Gardens. A central part of the Arcadia project linking Hampton Court Palace through Teddington, Twickenham, Ham, Petersham and Marble Hill, to Richmond Riverside and up to the iconic views from Richmond Hill and Pembroke Lodge. These vistas would have been familiar to Horace Walpole at Strawberry Hill, Alexander Pope, JMW Turner and many more. Now the gardens are hugely popular with local families and people of all ages enjoying the health and well-being benefits of accessible green space by the river. The listed war memorial provides a focus for quiet contemplation and respectful acknowledgment of service and sacrifice. A priceless natural asset for the borough and community.”</p>	Yes	Blank	Blank	
Rosalind Graham Hunt	 <p>View from Radnor Gardens across River Thames</p>	<p>the view from the bus over radnor gardens to the Thames is wonderful needs protecting - there are many other points where views of the thames are being blocked - we don't want to end up like lb of hounslow turning our backs on the Thames our greatest free asset in the borough.</p>	No	Prospect	on the bus is best way to see it you are higher up than being in the gardens or just in a car.	
Sam Martin	 <p>Ham Avenue</p>	<p>The view from both sides of the river is beautiful and full of wildlife and very well utilized</p>	Yes	Blank	Blank	




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Tina Bucklow-Waas (1)	 <p data-bbox="278 894 902 947"><i>Ham House South should be a linear view to include the Avenues behind Grey Court School</i></p>	There is some confusion on the Character Area Name of Ham Common and Riverside, in the View Name and Reference it suggests that it is the view from Ham House (South) linear. This is incorrect, it is a linear view of Ham Common.	No	Linear	Ham House South should be a linear view which should include the Avenues behind Grey Court. This is a site of special scientific and historical interest. This should comply with the Character and Heritage section of the Ham and Petersham Neighbourhood plan and any laws protecting it from the risk of development.	
Tina Bucklow-Waas (2)	 <p data-bbox="278 1425 655 1457"><i>A prospect view of Ham Common</i></p>	A prospect view of Ham Common are not specified.	Blank	Blank	Blank	
Tina Bucklow-Waas (3)	 <p data-bbox="278 1915 902 1942"><i>View across Ham Polo Ground from the Avenue towards Richmond Hill & view between Ham House East side and Ham Polo Ground down to the river</i></p>	The prospect view across Ham Polo Ground from the Avenue towards Richmond Hill and the linear view between Ham House East side and Ham Polo Ground down to the river	No	Linear	The private site of Ham Polo Ground backs on to the historic Ham House and is at risk of development of the boundaries if not protected.	



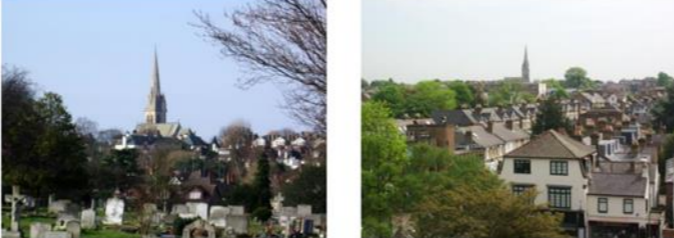


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	<i>Richmond Hill & view between Ham House East side and Ham Polo Ground down to the river</i>					
Tom Haworth (1)	 <p><i>Twickenham Green – View towards First Cross Road</i></p>	Twickenham Green. View across towards First Cross Road. There is a wildlife corridor behind first cross/second Cross Road which means that the view across Twickenham Green is unspoiled by development and currently contains a picturesque tree-lined view. I think development around Twickenham Green/ first/second cross road should be prevented where it will impact the view from the Green.	No	Prospect	The view is picturesque and tree lined. Any large development in the first cross/second cross area could damage this.	
Tom Haworth (2)	 <p><i>View from King Henry's Mound</i></p>	King Henry's Mound. Already a protected view but we must do our utmost to stop anything damaging this. Including making our voice heard in the GLA as risk comes from development outside the borough.				
Cllr Nancy Baldwin	<i>View of Kew Pagoda from top of Townshend Road (corner with Sheen Road)</i>	There is a lovely unencumbered view of the Kew Pagoda from the top of Townshend Rd (corner with Sheen Rd) which I strongly feel should be added to this lists of views. It is as much of a landmark for local residents as the view of St Matthias on Richmond Hill	No	?		
Gary Backler, Chair of FORCE	<i>River Crane Park</i>	To this end we believe that views from Craneford West Field, Mereway Nature Reserve and Kneller Gardens, from Crane Park throughout its length between Meadway in the east and the A314 in the west, including the view northwest from the A316 overbridge and the view of the Shot Tower and Crane Park Island Nature Reserve, and the view from Little Park towards Pevensy are all highly important and merit designation as linear views. In our opinion, these views are “related to the appreciation of the wider landscape...partly or wholly separate from any consideration of the significance of heritage assets.” (2.1)	No	Linear		




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Graham Fraser-Watson, The Teddington Society	 <p>1. Teddington Station from the pedestrian footbridge to the south east of the station. (Linear).</p>		No	Linear		
Graham Fraser-Watson, The Teddington Society	<p>2. Peg Woffington Cottage and St Marys from Sainsbury's in the High Street (on the corner of Langham Road and the High Street). (Townscape).</p> <p>(See above map)</p>		No	Townscape		



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Graham Fraser-Watson, The Teddington Society	3. St. Albans and St Maryy's from East side of Kingston Road by Ferry Road (Townscape). (See above map)		No	Townscape		
Graham Fraser-Watson, The Teddington Society	4. St. Mary's University Playing Fields & Lensbury from Kingston Road. (Prospect). (See above map)		No	Prospect		
Nicola Scaddan, Hampton Sailing Club	Character Area Name: Hampton Historic Centre View Name and Reference: Hampton Court Road / Thames Street (A308) towards Hurst Park (east) (A1.3)	<p>We write in relation to the recent public consultation regarding protected views in the Borough, an excerpt from which is attached for ease of reference.</p> <p>One of those views (page 15 of the document) affects the area surrounding Hampton Sailing Club.</p> <p>The viewpoint symbol on the GIS Mapping at A1.3 marks the proposed protected view as being from the public seating area on Bell Hill, below St Mary's Church (to assist in locating this on a map, this land is registered with Land Registry title number TGL291727).</p> <p>We note that the picture at A1.3 has been taken from Hampton Court Road, over the top of the wall alongside our property on the riverbank (Land Registry title number TGL343387).</p> <p>We have no objection to the protection of the view as marked on the GIS mapping, but the photograph A1.3 does not represent that view, and we do not want our property to be included in the protected area.</p>	Yes	Prospect		
Mark Knibbs (Avison)	Kew Gardens and Riverside Kew Bridge (east)	<ul style="list-style-type: none"> • No guidance/ description of visual amenity/ value • No identification of key contributors of view 	Yes	Prospect		

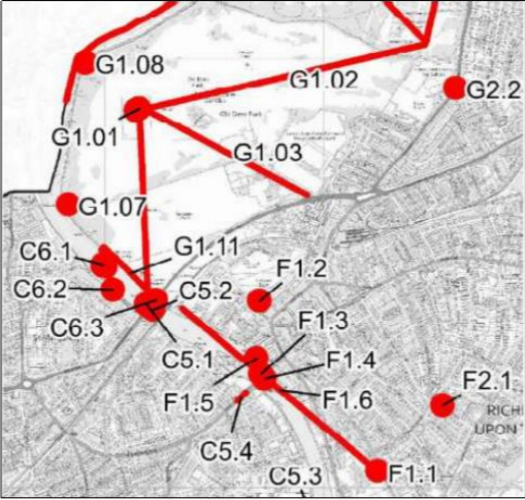
Name / Organisation	View location (from map or name)	Please provide any detailed comments on the specific view you selected	Is the specific local view you've told us about already covered in the SPD?	Please specify the type of view – Prospect, Linear or Townscape	Please describe how this view can be appreciated by the public, and how it could be harmed if it is at risk of development	Any other supporting or additional information submitted (in relation to general points)
Young – UK) on behalf of St George Plc and Marks and Spencer Group Plc (Kew Retail Park)		<ul style="list-style-type: none"> • No development management guidance 				
Mark Knibbs (Avison Young – UK) on behalf of St George Plc and Marks and Spencer Group Plc (Kew Retail Park)	Kew Gardens and Riverside Strand on the Green	<ul style="list-style-type: none"> • No identification of orientation • No guidance/ description of visual amenity/ value • No identification of key contributors of view • No development management guidance • Question the use of the word/phrase 'cluster' when referring to row of historic terraces fronting the northern/eastern bank of the River Thames 	Yes	Prospect		
Mark Knibbs (Avison Young – UK) on behalf of St George Plc and Marks and Spencer Group Plc (Kew Retail Park)	Kew Gardens and Riverside Parish Church of St. Anne, Kew Green	<ul style="list-style-type: none"> • Reference to 'multiple view'. If there are multiple locations/ viewpoints within Kew Green, these should be identified specifically on a plan for development management purposes. • No guidance/ description on visual amenity/ value • No identification of key contributors of view • No development management guidance • Omits reference to the existing appreciation of tall building/emerging development to the north of River Thames within Brentford (applicable if multiple views face north) 	Yes	Prospect		
Mark Knibbs (Avison Young – UK) on behalf of St George Plc and Marks and Spencer Group Plc (Kew Retail Park)	Kew Gardens and Riverside Chiswick Bridge (west)	<ul style="list-style-type: none"> • No guidance/ description of visual amenity/ value • No identification of key contributors of view • No development management guidance • No reference to the Brentford Tower Estate within the 'Description of View' • No identification of established and emerging mid-high rise development surrounding Brentford Football Stadium 	Yes	Prospect		
Mark Knibbs (Avison Young – UK) on behalf of St George Plc and Marks and Spencer Group Plc	Kew Residential Victoria Gate, Kew Gardens	<ul style="list-style-type: none"> • No guidance/ description of visual amenity/ value • No identification of key contributors of view • No development management guidance 	Yes	Townscape		



Name / Organisation	View location (from map or name)	Please provide any detailed comments on the specific view you selected	Is the specific local view you've told us about already covered in the SPD?	Please specify the type of view – Prospect, Linear or Townscape	Please describe how this view can be appreciated by the public, and how it could be harmed if it is at risk of development	Any other supporting or additional information submitted (in relation to general points)
(Kew Retail Park)						
Martha Bailey, London Historic Parks and Gardens Trust	Marble Hill House down to and across the Thames (opposite direction to view up to Marble House on page 28)	Whilst there are several views from within and out of RPGs (Richmond Park and Bushy Park are mentioned in particular) we would welcome the inclusion of additional views from within the RPGs out into the wider landscape. One example might be the view from Marble Hill House down to and across the Thames, in the opposite direction to the view up to Marble Hill House on page 28. LPG encourages the document to be made as comprehensive as possible, both through the addition of any new views which are brought to light during the consultation process and through expanding the details given in the 'Visual Management Guidance' section where possible, as many of these descriptions are fairly sparse.	No	?		
Paul Velluet (private capacity as a resident)	1 and 2: The prospect view from the promontory adjacent to the river and moorings along the riverbank by Hammerton's Ferry in Orleans Gardens looking downstream towards Richmond Hill, Petersham Common and the former Royal and Garter Home, and the prospect view from a little further downstream along Warren Footpath looking towards Richmond Hill, Petersham Common, The Terrace, the former Royal and Garter Home and the Petersham Hotel:		No	Prospect		
Paul Velluet (private capacity as a resident)	3 and 4: The prospect view from Radnor Gardens adjacent to the river looking downstream towards the upstream end of Eel Pie Island and the tower of St Mary's Church, Twickenham, and the linear view from close-by looking downstream to Radnor House School:		No	Prospect		
Paul Velluet (private capacity as a resident)	5 and 6: The prospect view looking across the river from the Middlesex bank towards St Helena Terrace and Wharf and the setting along the river, and the prospect view from the riverbank at the junction of Cholmondeley Walk and St Helena Wharf, by 'Bamber's Steps' looking upstream towards Richmond Bridge, the Hill and Petersham Common beyond;		No	Prospect		



Name / Organisation	View location (from map or name)	Please provide any detailed comments on the specific view you selected	Is the specific local view you've told us about already covered in the SPD?	Please specify the type of view – Prospect, Linear or Townscape	Please describe how this view can be appreciated by the public, and how it could be harmed if it is at risk of development	Any other supporting or additional information submitted (in relation to general points)
Paul Velluet (private capacity as a resident)	7 and 8: The prospect view looking across the river from the Middlesex bank towards Asgill House and its wider setting, and the prospect view looking downstream from Buccleuch Gardens towards Richmond Bridge		No	Prospect		
Paul Velluet (private capacity as a resident)	9 and 10: The prospect view from the Middlesex bank between Twickenham Bridge and Richmond Railway Bridge looking along the river below the arch of the railway bridge towards the Richmond Riverside Development and the spire of St Matthias' Church on the Hill beyond; and the prospect view from the Middlesex bank looking towards the Richmond Riverside Development and its wider setting:		No	Prospect		
Paul Velluet (private capacity as a resident)	11 and 12: Prospect views of St Matthias' Church and its setting on the hill, as seen from East Sheen Cemetery and from the tower of the Parish Church of St Mary Magdalene in the Town:		No	Prospect		
Paul Velluet (private capacity as a resident)	13 and 14: The prospect view towards Central London as seen from the tower of St Matthias' Church with Richmond and Sheen in the foreground, and the prospect view from the tower of the historic heart of Richmond and the Old Deer Park beyond looking north-westwards:		No	Prospect		
Paul Velluet (private capacity as a resident)	15: The prospect view towards Central London as seen from the tower and spire of St Matthias' Church with the drum and dome of St Paul's Cathedral at the centre, the skyline to the City of London to the RH, the Victoria Tower of the Palace of Westminster further to RH and the Shard to the furthest RH; the Post Office (British Telecom) Tower to the furthest LH and the roofs of Christ's School, Queen's Road in the foreground:		No	Prospect		




Name / Organisation	View location (from map or name)	Please provide any detailed comments on the specific view you selected	Is the specific local view you've told us about already covered in the SPD?	Please specify the type of view – Prospect, Linear or Townscape	Please describe how this view can be appreciated by the public, and how it could be harmed if it is at risk of development	Any other supporting or additional information submitted (in relation to general points)
Paul Velluet (private capacity as a resident)	16 and 17: Prospect views of the Old Deer Park, viewed from one of the two, listed obelisks in the park adjacent to the ha-ha and from the Richmond Cricket Club – London Welsh Rugby Football Club Ground, looking towards the Pagoda in the Royal Botanic Gardens, Kew:		No	Prospect		
Paul Velluet (private capacity as a resident)	18 and 19: Prospect views of The Green, viewed from the High Walk on its north-western side looking towards the listed, 17th century Old Palace Terrace and its setting, and from the listed drinking-fountain at its southern corner looking towards Portland Terrace		No	Prospect		
Paul Velluet (private capacity as a resident)	20, 21 and 22: The linear view of the Terrace Field (the Hill Common) and Terrace Gardens beyond looking north-westwards with Asgill House on the Riverside in the distance; the prospect view of the river as seen from the lower part of the Terrace Gardens with Corporation Island in the distance; and the prospect view of the river looking upstream from the upper part of the Terrace Gardens:	 <p data-bbox="982 1457 1635 1738">It is noted that the view looking north-westwards across the Terrace Field (the Hill Common) and the Terrace Gardens is already adopted as 'Linear view F1.6 - Asgill House'. Whilst the protection of the distant view of Asgill House is of considerable importance, the additional landscape value and significance of its setting is understated. Accordingly it is suggested that consideration should be given to amending the description to provide recognition to the landscape setting.</p>	No/Yes	Prospect/Linear		





Name / Organisation	View location (from map or name)	Please provide any detailed comments on the specific view you selected	Is the specific local view you've told us about already covered in the SPD?	Please specify the type of view – Prospect, Linear or Townscape	Please describe how this view can be appreciated by the public, and how it could be harmed if it is at risk of development	Any other supporting or additional information submitted (in relation to general points)
Paul Velluet, Garrick's Temple to Shakespeare Trust	23: Finally and importantly, whilst this view is already adopted as Prospect view A1.1, it is mistitled as 'Shakespeare's Temple (Garrick's Villa) with the viewing-point located on the roof of the Loggia – at street level on Hampton Court Road. This does not show the Temple in its attractive and highly relevant, landscaped setting on Garrick's Lawn. Firstly, the title of the view needs to be corrected to 'Garrick's Temple to Shakespeare'; secondly, the viewing-point needs to be lowered to the level of Garrick's Lawn, as below; and thirdly, the accompanying text needs to be amended to refer to the essential association between the Temple, the Lawn and the river.		Yes	Prospect		
Peter Willan, Friends of Richmond Green	(Comments on existing views) C5.4 Richmond Road, East Twickenham F1.2 Richmond Green, Townscape F1.6 Asgill House F2.1 Church of St Matthias F1.1 Richmond Terrace, Richmond Hill F1.3 Richmond Bridge (north-east)	<p>We wish to make some suggestions on presentation to provide clarity and accuracy so that those less familiar with a view can be sure of the facts.</p> <p>a. Most images for the views display a marker for the viewing location but C5.4 <i>Richmond Road, East Twickenham</i> omits any marker?</p>  <p>Figure 1 Marker at Viewing Location</p> <p>b. The viewing location for three of the views appears to be variable - spread over an area, e.g. C5.4 <i>Richmond Road, East Twickenham</i> (Townscape Adopted), and F1.2 <i>Richmond Green Surrounding Roads (The Green, Pembroke Villas and Portland Terrace)</i>(Townscape New). In the case of Richmond Green we believe it is essential that the viewing locations be at any point 360 degrees around Richmond Green and should include Maids of Honour Row as the fourth side of the Green but this has been omitted from the description. We discuss this later.</p> <p>c. Local Views map</p>	Yes	Various		



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		 <p data-bbox="997 919 1338 940">Figure 2 Extract from Local Views map July 2022</p> <p data-bbox="973 978 1644 1066">i. Detail is insufficient to be able to identify viewing locations and specific view end points (often the end points can be guessed at but not for all of the views).</p> <p data-bbox="973 1066 1644 1205">ii. It would seem the map shows the one linear view relevant to FoRG with a line. The map is busy with views and it would help to distinguish the views by having directional arrows on the lines and an arrow for each of the non-linear views.</p> <p data-bbox="973 1239 1644 1377">d. Consistency on titles of views could be improved. Most of the titles start with the viewing location, e.g. Richmond Bridge. But F1.6 is titled <i>Asgill House</i> and F2.1 is <i>Church of St Matthias</i>. In the case of the latter we have not been able to identify the precise viewing location.</p> <p data-bbox="973 1411 1308 1436">e. Images might be improved:</p> <p data-bbox="973 1465 1644 1751">i. C5.4 <i>Richmond Road, East Twickenham (Townscape Adopted)</i>. On the other side of the Richmond Road there is a K6 Sir Giles Gilbert Scott telephone kiosk which is Grade II listed and it is of significance in conjunction with the adjacent Grade I listed Richmond Bridge (which is not mentioned as such but should be). It may be difficult to include the K6 kiosk in the foreground of the image but we suggest it be attempted and at least its significance be mentioned in the view description. Figure 4 is for illustration only.</p>				

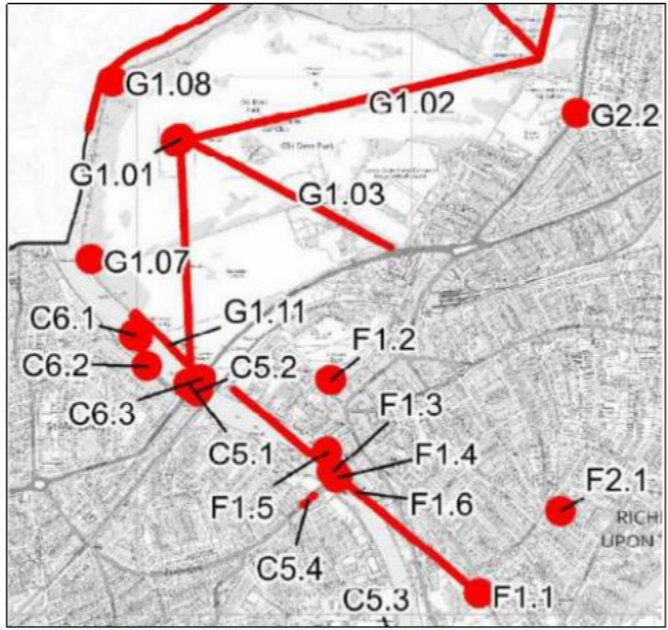
Name / Organisation	View location (from map or name)	Please provide any detailed comments on the specific view you selected	Is the specific local view you've told us about already covered in the SPD?	Please specify the type of view – Prospect, Linear or Townscape	Please describe how this view can be appreciated by the public, and how it could be harmed if it is at risk of development	Any other supporting or additional information submitted (in relation to general points)
		  <p>Figure 3 C5.4 Richmond Road, East Twickenham Prospect Adopted</p> <p>Figure 4. C5.4 Richmond Road, East Twickenham</p> <p>ii. F1.1 Richmond Terrace, Richmond Hill (Prospect Adopted). Half the image is taken up by the Terrace, which seems excessive.</p> <p>iii. F1.2 <i>Richmond Green Townscape New</i>. Two images are provided. These are not perhaps the best selection and are similar in view. We suggest four images showing views of all four sides and possibly trees without leaves would be preferable although the trees are of substantial significance throughout the seasons. We recommend the viewing locations be at any point 360 degrees around Richmond Green and should include Maids of Honour Row as the fourth side of the Green but this has been omitted from the description. Now that the development of the House of Fraser site is being considered we suggest it is opportune to restore the view as a protected view along with the townscape views from the rest of Richmond Green. Figure 6 shows the existing view with ugly plant and machinery on top, which in any development we suggest should be removed and without an additional floor and plant-room on top.</p>				




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		 <p>View: F1.2</p> <p>Figure 5 F1.2 Richmond Green, Townscape New proposed by draft SPD</p>  <p>Figure 6 View from Richmond Green Existing 80 George Street with Heritage Assets in foreground, 2020</p> <p>iv. F1.3 Richmond Bridge (north-east). The two images in a wide angled way distort the bridge itself.</p> <p>v. F1.6 Asgill House. Asgill House is difficult to identify from the image.</p> <p>TREE MANAGEMENT NEEDED TO IMPROVE VIEWS</p> <p>1. F1.6 Asgill House (Linear Adopted). We suggest the View of Asgill House Linear Adopted from the Terrace, Richmond Hill would benefit from opening the tree gap.</p>				




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		 <p data-bbox="988 884 1341 919">Figure 7 F1.6 Asgill House</p>				
Peter Willan, Friends of Richmond Green	<p data-bbox="284 961 923 1020">NEW VIEWS PROPOSED BY FRIENDS OF RICHMOND GREEN</p> <p data-bbox="284 1045 721 1081">1. Richmond Little Green Townscape</p>	<p data-bbox="982 961 1635 1052">We recommend the viewing locations be at any point 360 degrees around the Little Green in a similar manner to that proposed for the main Richmond Green (see above).</p>  <p data-bbox="988 1358 1255 1377">Figure 8 Richmond Little Green Townscape</p>	No	Townscape		
Peter Willan, Friends of Richmond Green	<p data-bbox="284 1413 813 1472">2. Gatehouse to Old Palace Richmond Green Townscape</p>	<p data-bbox="982 1413 1635 1528">On the assumption a 360 degree view is adopted for Richmond Green then this view of the Gatehouse to the Old Palace would be included and not necessary as a separate view.</p>  <p data-bbox="988 1799 1341 1818">Figure 9 Gatehouse to Old Palace, Richmond Green Townscape</p>	No	Townscape		

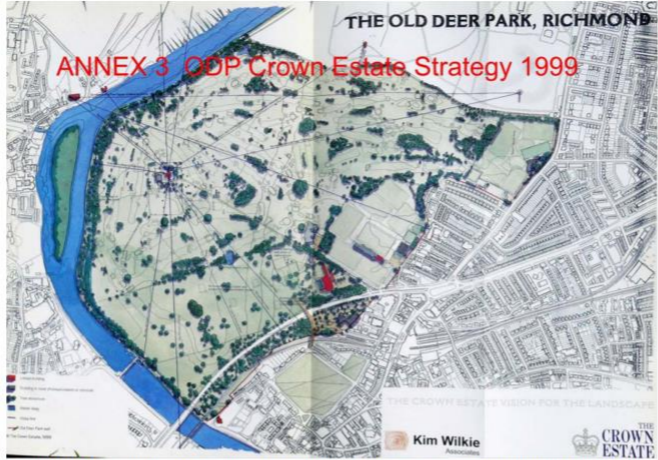
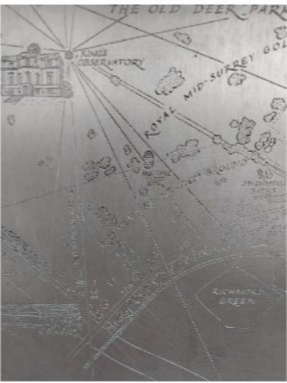
Name / Organisation	View location (from map or name)	Please provide any detailed comments on the specific view you selected	Is the specific local view you've told us about already covered in the SPD?	Please specify the type of view – Prospect, Linear or Townscape	Please describe how this view can be appreciated by the public, and how it could be harmed if it is at risk of development	Any other supporting or additional information submitted (in relation to general points)
Peter Willan, Friends of Richmond Green	3. Old Palace Lane Townscape	 <p>Figure 10 Old Palace Lane Townscape. Credit Richmond Museum</p>	No	Townscape		
Peter Willan, Friends of Richmond Green	4. Twickenham Road Footbridge to St Matthias Church Spire (Linear)	<p>St Matthias Church spire is a significant landmark with views from many parts of southwest London. Figures 11 and 13 show a view from the Twickenham Road Footbridge and another from within the ODP Recreation Ground. Figure 12 shows a view from Richmond Green. We suggest consideration be given to adopting one or more of these views.</p> <div style="display: flex; justify-content: space-around;"> <div data-bbox="988 1125 1199 1486">  <p>Figure 11 Twickenham Road Footbridge view to St Matthias Church, Richmond Hill</p> </div> <div data-bbox="1249 1125 1620 1381">  <p>Figure 12 Richmond Green view to St Matthias Church, Richmond Hill</p> </div> </div> <div data-bbox="988 1566 1605 1850">  <p>Figure 13 ODP view to St Matthias Church, Richmond Hill</p> </div>	No	Linear		

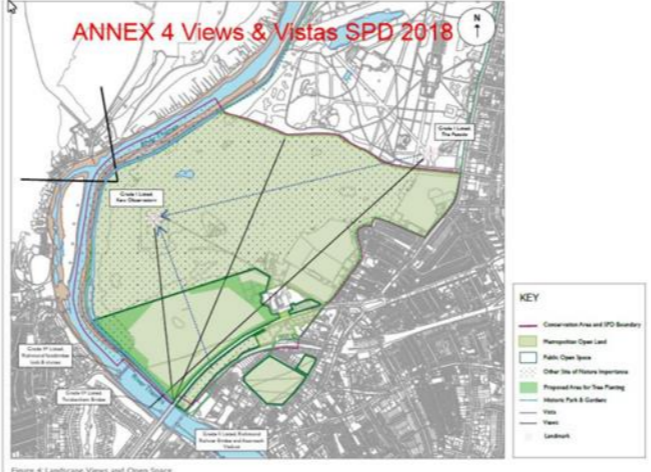
Name / Organisation	View location (from map or name)	Please provide any detailed comments on the specific view you selected	Is the specific local view you've told us about already covered in the SPD?	Please specify the type of view – Prospect, Linear or Townscape	Please describe how this view can be appreciated by the public, and how it could be harmed if it is at risk of development	Any other supporting or additional information submitted (in relation to general points)
Peter Willan, Friends of Richmond Green	5. View from Richmond Hill towards Richmond Town	<p>At present trees and other vegetation blocks any view from the Terrace Richmond Hill towards Richmond Town. Consideration might be given to opening up a view. See Figure 14.</p>  <p>Figure 14 Richmond Hill Terrace view towards Richmond blocked by trees, etc.</p>	No	?		
Peter Willan, Friends of Richmond Green	6. View from Richmond Park Pembroke Lodge towards Richmond Town	? Is there a view to be created.	No	?		
Peter Willan, Old Deer Park Working Group	C5.1 Twickenham Bridge (north-east) Prospect C5.2 Twickenham Bridge (south-east) Prospect C6.1 Richmond Lock & Weir Prospect C6.2 St Margarets Riverside Prospect C6.3 View of the Great Pagoda St Margarets Linear G1.1 Kings Observatory, Old Deer Park Linear G1.2 King's Observatory towards Kew Gardens Linear New G1.3 Kings Observatory towards Richmond Town Centre Linear New G1.11 Old Deer Park Riverside Prospect New	<p>PRESENTATION</p> <p>1. We wish to make some suggestions on presentation to provide clarity and accuracy so that those less familiar with a view can be sure of the facts.</p> <p>a. Most images for the views display a marker for the viewing location but G1.11 <i>Old Deer Park Riverside</i> omits any marker?</p>  <p>Figure 1 Marker at Viewing Location</p> <p>b. Prospect views understandably do not have a single line showing the direction of a wide landscape, parkscape or riverscape view without a specific end point but linear views do, except C6.3 <i>View of the Great Pagoda, St Margarets (Linear Adopted)</i> ?</p> <p>c. The viewing location for the views appears to be variable even when there is a view marker - spread over an area, e.g. C6.2 <i>St Margarets Riverside Ranelagh Drive and surrounding paths (Prospect Adopted)</i>, and G1.11 <i>Old Deer Park Riverside (Prospect New)</i>.</p> <p>d. Local Views map</p> <p>i. Detail in the map is insufficient to be able to identify viewing locations and specific view end points (often the end points can be guessed at but not for all of the views).</p>				




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		<p>ii. It would seem the map shows all four linear views relevant to the ODPG with a line. The map is busy with views and it would help to distinguish the views by having directional arrows on the lines and an arrow for each of the nonlinear views.</p>  <p>Figure 2 Extract from Local Views Map July 2022 for consultation</p> <p>e. Consistency on titles of views could be improved. Most of the titles start with the viewing location, e.g. Richmond Bridge. But 6.3 is titled <i>View of the Great Pagoda, St Margarets</i>. G1.1 is titled <i>King's Observatory, Old Deer Park</i> and we suggest it would be better titled <i>'King's Observatory towards stone obelisks'</i>, however there is some uncertainty as to the exact view G1.1 portrays.</p> <p>f. Images for improvement: <i>G1.2 King's Observatory view towards Kew Gardens (Linear New)</i> and <i>G1.3 King's Observatory view towards Richmond Town centre (Linear New)</i>, have yet to be provided by the Council and so our support is provisional at this stage.</p> <p>TREE MANAGEMENT NEEDED TO IMPROVE VIEWS</p> <p>1. <i>C6.3 View of the Great Pagoda, St Margarets (Linear Adopted)</i>. The Pagoda cannot be identified in the image Figure 3 overpage. The Pagoda is hidden by tree growth on the riverbank and in the ODP. Figure 4 is a view from the marker on the Richmond Riverside by Twickenham Bridge. The Pagoda is directly behind the clump of trees in the centre of the image. The Old Deer Park Working Group are in discussion with the Council Parks Team about re-instating</p>				


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		<p>this and other views within and to and from the Old Deer Park.</p> <div style="display: flex; justify-content: space-around;"> <div data-bbox="988 506 1308 720">  <p>Figure 3 C6.3 View of Great Pagoda, St Margarets Linear Adopted</p> </div> <div data-bbox="1409 506 1605 720">  <p>Figure 4 C6.3 Linear view of Pagoda blocked by trees</p> </div> </div> <p>2. G1.1 King's Observatory, Old Deer Park Linear Adopted We suggest that the View from the King's Observatory to the stone obelisks needs further opening of the gap along the boundary of ODP Recreation Ground and Royal Mid Surrey Golf Course. Some work has been undertaken in the recent past. The ODPG is liaising with the Council's Parks Team and others. The Image Figure 5 provided with the SPD is not in the right line between the Observatory and the stone obelisks but it shows the gap.</p> <div data-bbox="988 1052 1546 1423">  <p>Figure 5 G1.1 King's Observatory, to stone Obelisks showing gap</p> </div>				
Peter Willan, Old Deer Park Working Group	NEW VIEWS PROPOSED BY ODPG 1. Old Deer Park Views Landscape	We suggest a 360 degree approach to views be adopted for the Recreation Ground of the Old Deer Park. Figure 6 shows a typical uninterrupted view to the south west from within the ODP as an example. Figures 7 and 8 show where the ODP 360 degree view has been interrupted and we suggest a 360 degree view is needed to protect further interruptions.	No	?		

Name / Organisation	View location (from map or name)	Please provide any detailed comments on the specific view you selected	Is the specific local view you've told us about already covered in the SPD?	Please specify the type of view – Prospect, Linear or Townscape	Please describe how this view can be appreciated by the public, and how it could be harmed if it is at risk of development	Any other supporting or additional information submitted (in relation to general points)
		 <p>Figure 6 Example of ODP skyline to south-east</p>  <p>Figure 7 Example of ODP skyline to north west with tall building interrupting view</p>  <p>Figure 8 Example of ODP skyline to south east with tall building interrupting view</p>				
Peter Willan, Old Deer Park Working Group	2. Old Deer Park Linear	The Crown Estate Strategy for the Old Deer Park proposes a number of linear views from the King's Observatory. One has already been adopted G1.1 <i>King's Observatory to stone obelisks</i> . Two are proposed by the SPD G1.2 <i>King's</i>	No	Linear		

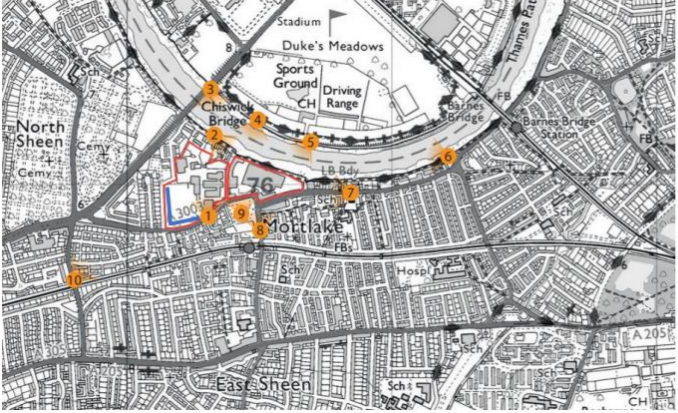
Name / Organisation	View location (from map or name)	Please provide any detailed comments on the specific view you selected	Is the specific local view you've told us about already covered in the SPD?	Please specify the type of view – Prospect, Linear or Townscape	Please describe how this view can be appreciated by the public, and how it could be harmed if it is at risk of development	Any other supporting or additional information submitted (in relation to general points)
		<p>Observatory towards Kew Gardens and G1.3 King's Observatory towards Richmond Town Centre. But from the Crown Estate map others should be considered. The Old Deer Park SPD 2018 replicated some of these, see Figure 11.</p>  <p>ANNEX 3 ODP Crown Estate Strategy 1999</p> <p>Figure 9 ODP Strategy 1999 Crown Estate Views from the King's Observatory and Syon House</p>  <p>Figure 10 ODP Crown Estate Strategy views & vistas Source Riverside markers</p> <p>The ODP SPD 2018 makes a number of important points about views and vistas: Page 23 says 'There are a number of important Views and Vistas across the Park. These are primarily related to The King's Observatory and the related meridian lines, (which are denoted by a number of obelisks located at different points within the Park) and to the Pagoda within the Royal Botanic Gardens, Kew (which is a Grade I Listed Building and is a landmark within the wider area). However, these have been obscured over the course of time, including as a result of the encroachment of scrub vegetation along the towpath and within the Royal Mid-Surrey Golf Club. In addition tree overhang along the</p>				




Name / Organisation	View location (from map or name)	Please provide any detailed comments on the specific view you selected	Is the specific local view you've told us about already covered in the SPD?	Please specify the type of view – Prospect, Linear or Townscape	Please describe how this view can be appreciated by the public, and how it could be harmed if it is at risk of development	Any other supporting or additional information submitted (in relation to general points)
		<p><i>towpath including between, the Old Deer Park Recreation Ground and the Royal Mid-Surrey Golf Club also has an impact. There are real opportunities to improve/open up these views and vistas by appropriate removal or pruning of trees and vegetation although there are some areas where this needs careful consideration to ensure that it doesn't result in disturbance to important fauna. 'Grow back' has occurred following previous clearance works. There is therefore a need to introduce a regular maintenance regime for these areas.'</i></p> <p><i>In particular there are opportunities to provide information on, and better identify the views to The King's Observatory from within the Park and from adjacent areas. This could reflect the approach taken by the Crown Estate 'marker' on the towpath. However, these are need of maintenance.</i></p> <p>In regard to the Richmond Athletic Association Ground (ODP) the SPD discusses the re-development of the grandstand and the potential for improving views from the King's Observatory but also possible adverse impacts on other views. There is also discussion on improvement of the Old Deer Park car park and beneficial impact on views. The ODPG would welcome the opportunity of working with the Council in identifying the additional linear views that might be considered based on the Crown Estate's Strategy.</p>  <p>Figure 11 ODP Landscape Views and Open Space. Source ODP SPD 2018</p>				
Peter Willan, Old Deer Park Working Group	3. Twickenham Road Footbridge to St Matthias Church Spire (Linear)	St Matthias Church spire is a significant landmark with views from many parts of southwest London. Figures 12 and 14 shows a view from the Twickenham Road Footbridge and another from within the ODP Recreation Ground. Figure 13 shows a view from Richmond Green. We suggest consideration be given to adopting one or more of these views.	No	?		


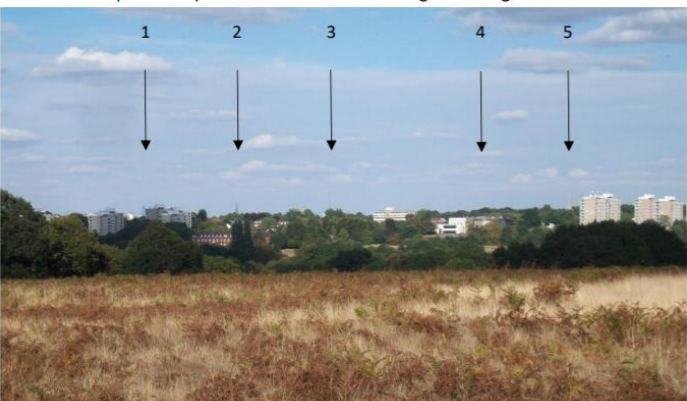
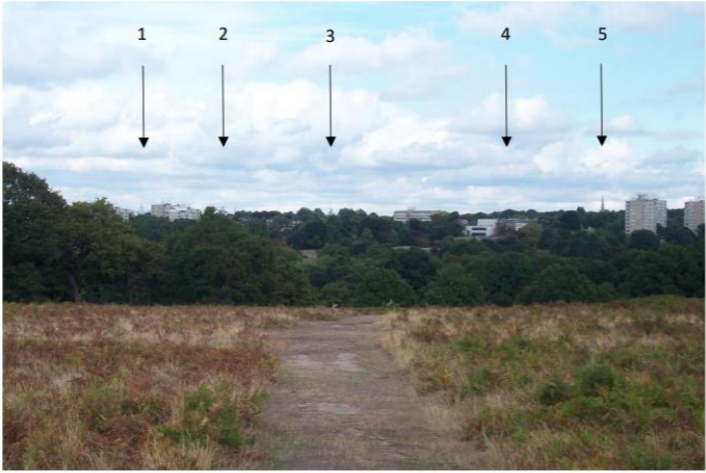
Name / Organisation	View location (from map or name)	Please provide any detailed comments on the specific view you selected	Is the specific local view you've told us about already covered in the SPD?	Please specify the type of view – Prospect, Linear or Townscape	Please describe how this view can be appreciated by the public, and how it could be harmed if it is at risk of development	Any other supporting or additional information submitted (in relation to general points)
		 <p>Figure 12 Twickenham Road Footbridge view to St Matthias Church, Richmond Hill</p>  <p>Figure 13 Richmond Green view to St Matthias Church, Richmond Hill</p>  <p>Figure 14 ODP view to St Matthias Church, Richmond Hill</p>				
Peter Willan, Old Deer Park Working Group	4. Richmond Hill to King's Observatory Old Deer Park (Linear)	Views involving the King's Observatory are usually linear views from the Observatory but Figure 15 shows a view from near the top of Richmond Hill at the junction between Montague Road and Friars Stile Road. We have not had the time to confirm the view but it is probably the only view from Richmond Hill and we suggest consideration be given to its adoption.	No	Linear		

Name / Organisation	View location (from map or name)	Please provide any detailed comments on the specific view you selected	Is the specific local view you've told us about already covered in the SPD?	Please specify the type of view – Prospect, Linear or Townscape	Please describe how this view can be appreciated by the public, and how it could be harmed if it is at risk of development	Any other supporting or additional information submitted (in relation to general points)
		 <p data-bbox="991 961 1368 1052">Figure 15 Richmond Hill (Montague Road) to King's Observatory ODP</p>				
Susie Taylor, Royal Botanic Gardens, Kew	G1.13 – (pg 46) – Kew Gardens and Riverside, Kew Bridge PROSPECT	<p data-bbox="982 1077 1650 1329">RBGK is generally supportive of the draft Local Views SPD and acknowledges the importance of protecting the quality of views and vistas, particularly those affecting the World Heritage Site, for future generations. RBGK agrees there is a need to provide further guidance on these Local Plan views for the public and developers/applicants through supplementary planning guidance to ensure the landscape and townscape within the Borough is appropriately protected.</p> <p data-bbox="982 1360 1650 1413">RBGK's detailed comments on these specific views are set out below.</p> <p data-bbox="982 1444 1650 1497">G1.13 – (pg 46) – Kew Gardens and Riverside, Kew Bridge PROSPECT</p> <p data-bbox="982 1528 1650 1917">Kew Gardens is completely hidden in this view by trees. As referenced in RBGK's Setting Study – Kew is one of a series of parks and estates along this part of the Thames and its historic and modern relationship with the River Thames is an important aspect of its setting. The World Heritage Site (WHS) intersects with the Thames along its western and northern edges and has quite a different relationship with the river in these two distinct areas. To the north and northwest of Kew's riverbanks (in this view), the urban development of Brentford is close by, on the other side of the river and this view is characterised by its 'heavily wooded' and 'naturalised' setting, which contributes to the backdrop and sense of enclosure experienced in the WHS at this point.</p>	Yes	Prospect		

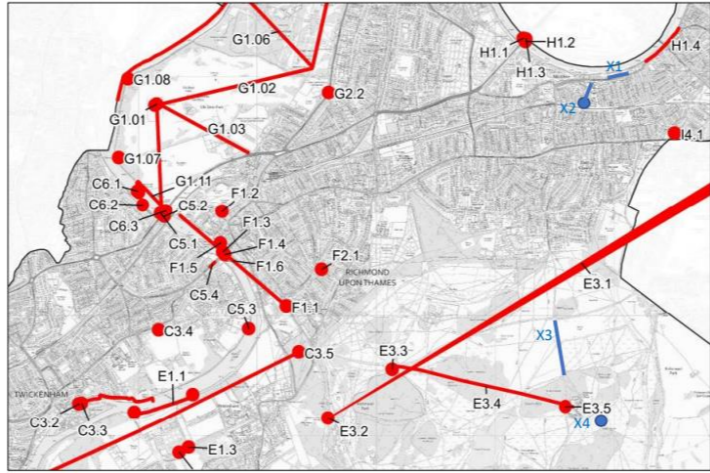
Name / Organisation	View location (from map or name)	Please provide any detailed comments on the specific view you selected	Is the specific local view you've told us about already covered in the SPD?	Please specify the type of view – Prospect, Linear or Townscape	Please describe how this view can be appreciated by the public, and how it could be harmed if it is at risk of development	Any other supporting or additional information submitted (in relation to general points)
Susie Taylor, Royal Botanic Gardens, Kew	G1.16 - (pg 49) – Kew Gardens and Riverside, Parish Church of St Anne, Kew PROSPECT	RBGK is supportive of this new prospect view which falls within the buffer zone of the WHS. As the historic entrance to Kew Gardens, this view is referenced in RBGK's Setting Study as D8(vi) (Entrances and Exits, pg 138). Kew Green is a defining feature of the approach to and exit from the WHS. Its open 'village green' character forms a core element of the setting of a number of historic listed buildings that flank the southern edge of Kew Green and mark the northern boundary of the WHS. It is also the intended setting to foreground Decimus Burton's entrance gates, from which lead his epitome of Victorian formal landscape design, the Little Broadwalk and Broadwalk promenades. A long-standing concern for RBGK has been the impact of traffic (coaches primarily) around Kew Green on the ability to appreciate this view, and RBGK is keen to work with LB Richmond upon Thames to find a solution to this. Equally, developments along the Great West Corridor (GWC) continue to come forward that would overtop the 18th and 19th century buildings enclosing the Green and harm what is a fairly well-preserved architectural and landscape setting.	Yes	Prospect		
Susie Taylor, Royal Botanic Gardens, Kew	G2.2 - (pg 92) - Kew Road towards the Great Pagoda TOWNSCAPE	This is a view from within the WHS Buffer Zone looking towards Kew Gardens, where the Pagoda comes into view on approach from Richmond. RBGK is supportive of this proposed new view, which is an important kinetic view that forms a key part of the 'arrival' sequence to the Gardens for those coming from Richmond. RBGK is aware of several applications that have come forward in this location for large telecoms masts which were subsequently refused on the basis of the visual impact it would have on the Old Deer Park and RBGK. RBGK is therefore supportive of the inclusion of this new view in the Draft SPD, as it would serve to recognise the sensitivity of this location	Yes	Townscape		
Susie Taylor, Royal Botanic Gardens, Kew	View G1.4 (pg 76) – Pagoda Vista, Kew Gardens LINEAR	The Pagoda Vista is experienced in both directions (not just from the Palm House – it also frames views of the Palm House). Views from locations along its length, in both directions, are also important.	Yes	Linear		
Susie Taylor, Royal Botanic Gardens, Kew	View G1.5 (pg 77) – Syon Vista, Kew Gardens LINEAR	The Syon Vista is experienced in both directions, not just from the Palm House. It also frames views of the Palm House. Views from locations along its length, in both directions, are also important. This view is not shown on the accompanying plan.	Yes	Linear		
Susie Taylor, Royal Botanic Gardens, Kew	View G1.9 – (pg 80) (former) St George's Church, Old Brentford LINEAR	The vista is experienced in both directions and from locations along its length.	Yes	Linear		
Susie Taylor, Royal Botanic Gardens, Kew	View G2.1 (pg 91) – Victoria Gate, Kew Gardens TOWNSCAPE	The view operates in both direction to and from Victoria Gate.	Yes	Townscape		

Name / Organisation	View location (from map or name)	Please provide any detailed comments on the specific view you selected	Is the specific local view you've told us about already covered in the SPD?	Please specify the type of view – Prospect, Linear or Townscape	Please describe how this view can be appreciated by the public, and how it could be harmed if it is at risk of development	Any other supporting or additional information submitted (in relation to general points)
Gardens, Kew						
Julia Frayne, The Royal Parks	E3.2 from King Henry's Mound in Richmond Park to Petersham Park	We would however, draw attention to the terminology used to describe the view (ref E3.2) from King Henry's Mound in Richmond Park to Petersham Park. This is more correctly described as a long distant horizontal view, as it does not afford views to lower levels down the slope.	Yes	?		
Tim Catchpole, Mortlake with East Sheen Society	<p>5. We would like to see a number of additional views included as shown on the map below, these having been agreed between the Council and the developer of the Stag Brewery site some 5 years ago (source: applicant's Environmental Statement Vol 3 Appendix 16):</p> 	<p>View 1 – prospect from Lower Richmond Road across the Brewery Playing Fields (OOLTI) to the historic site of Cromwell House including its surviving gate listed Grade II, only it needs to be a sequential view along both the Lower Richmond Road and Williams Lane sides of the Playing Fields as shown above in blue and as View 1A on the next page.</p> <p>View 2 – prospect (also sequential view) of the Mortlake riverside including seven Grade II listed properties and the Maltings BTM, all within the Mortlake Conservation Area.</p> <p>View 3 – prospect from Chiswick Bridge of the same Mortlake riverside (already on your Boroughwide Local Views map).</p> <p>View 4 – prospect from Thames Path/Dan Mason Drive of the same Mortlake riverside with the Maltings BTM immediately opposite (LB Hounslow).</p> <p>View 5 – prospect from Thames Path near Dukes Meadows Golf Club of the same Mortlake riverside (LB Hounslow).</p> <p>View 6 – prospect from Thames Path outside the White Hart public house (already on your Boroughwide Local Views map).</p> <p>View 7 – townscape view along Mortlake High Street looking west from St Mary's Church with the historic bottling plant and former hotel, both BTMs on the right.</p> <p>View 8 – prospect from Sheen Lane across Mortlake Green (OOLTI) to the Brewery site. View 9 – prospect from Mortlake Green itself (OOLTI) to the Brewery site.</p> <p>View 10 – prospect from the bridge carrying the South Circular Road over the railway. We are inclined not to include this one as it does not feature the same degree of visual interest as in the other nine.</p>	No	Prospect/townscape		

Name / Organisation	View location (from map or name)	Please provide any detailed comments on the specific view you selected	Is the specific local view you've told us about already covered in the SPD?	Please specify the type of view – Prospect, Linear or Townscape	Please describe how this view can be appreciated by the public, and how it could be harmed if it is at risk of development	Any other supporting or additional information submitted (in relation to general points)
Tim Catchpole, Mortlake with East Sheen Society	View 1A – Prospect from Lower Richmond Road, Mortlake 	Part of the sequential view along the Lower Richmond Road with Williams Lane on the left looking across the velvety green of the Brewery Playing Fields (OOLTI) to the historic site of Cromwell House including its surviving gate listed Grade II (shown arrowed). The playing fields (two football pitches and a cricket square between them) were formerly used by the Brewery staff, who lived in the immediate vicinity, and are now used by local schools. The site is also used by the local community for the annual Mortlake Fair.	No	Prospect		
Tim Catchpole, Mortlake with East Sheen Society	6. In addition, we would like to see four other views included: View X1 – Prospect across Jubilee Gardens, Mortlake 	This green space was laid out on the former Barnes Depot site to commemorate the Queen's Silver Jubilee in 1977. There are sequential views across it from Mortlake High Street towards the river at the point where the University Boat Race reaches its climax. The space has been used for fairs associated with this event.	No	Prospect		
Tim Catchpole, Mortlake with East Sheen Society	View X2 – linear view along Church Path to St Mary's Church, Mortlake. 	This is an ancient path from the Upper Richmond Road to the Church. There was much protest when it was severed by the Richmond-Waterloo railway in the 19th century. The view of the Church in the northern part of Church Path from the railway is partly obscured by trees and the Council, as owner of Church Path, is no doubt aware of this.	No	Linear		

Name / Organisation	View location (from map or name)	Please provide any detailed comments on the specific view you selected	Is the specific local view you've told us about already covered in the SPD?	Please specify the type of view – Prospect, Linear or Townscape	Please describe how this view can be appreciated by the public, and how it could be harmed if it is at risk of development	Any other supporting or additional information submitted (in relation to general points)
Tim Catchpole, Mortlake with East Sheen Society	View X3 – sequential prospect from Richmond Park to the Alton Estate, Roehampton 	This view from the road between Sheen Cross and the White Lodge looks east across open land in the Park to the Grade II listed Holy Trinity Church, Roehampton, rising up between the Grade II* listed slab blocks of the Alton Estate on the left and the Grade II tower blocks of the same estate on the right. We are aware of current proposals to expand this estate and trust that this view from within our Borough is being/has been considered.	No	Prospect		
Tim Catchpole, Mortlake with East Sheen Society	View X4 – Prospect from plateau east of the White Lodge including linear views 	This view is from near a bench on the plateau looking east to Roehampton and it includes linear views to (1) Bishopsgate Tower, (2) the Shard, (3) the Vauxhall cluster, (4) the Grade I listed Parkstead (formerly Manresa) House and (5) Holy Trinity Church, Roehampton, as well as the Alton Estate. Curiously the bench does not face east; instead it faces north to the Wembley Stadium. The view below is from a pathway near the bench with again linear views to the same five landmarks. 1 2 3 4 1 	No	Prospect		

These four additional views are shown below:

Name / Organisation	View location (from map or name)	Please provide any detailed comments on the specific view you selected	Is the specific local view you've told us about already covered in the SPD?	Please specify the type of view – Prospect, Linear or Townscape	Please describe how this view can be appreciated by the public, and how it could be harmed if it is at risk of development	Any other supporting or additional information submitted (in relation to general points)
		 <p data-bbox="973 919 1650 1003">We would be grateful if you would consider points 1-6 above when finalising your SPD and we look forward to hearing from you.</p>				

Comments on view management and guidance and any general comments

Name / Organisation	Do you think there is scope to include in the SPD more detailed guidance on assessing the impact of development on views? <i>(also includes answers to question 'please tell us more')</i>	Do you have any further general comments about the draft SPD?	Any other supporting or additional information submitted (in relation to general points)
Alistair Johnston	Yes	Blank	
Anna Newton Dun	Yes The views from the obelisks in Old Deer Park towards the King's Observatory are now overgrown by threes and should be opened up.	Blank	
Barbara Hodgson	Don't know	Looks sensible.	
Brandan Holmes	Yes	Blank	
Christie Fidura	Don't know	Blank	
D Collins	Don't know	No	
Deborah Sayer	Don't know	I am just a local resident. I do not know about the technical and legal issues. All I am saying is that introducing higher density and higher buildings on the Embankment will damage and, possibly destroy the view of the Embankment which makes people feel calm and happy when they are there. We have a wonderful and precious asset. It would be such a tragedy to build over it. The precious view is not just looking at the river but being by the river and looking at the surroundings. People want and need quiet places to go.	
Desmond Curran	Don't know	A very good initiative, but no specific additional comments to those already given.	
Diamantina Harrington	Yes	Blank	
Emma van Rooyen	Don't know	We are lucky to live in a borough with many wonderful views. We want to ensure these views are permanently and maintain their special character.	
Fay SI Johnstone	Yes	Blank	
Gary Backler	Yes We believe that "there is scope to include in the SPD more detailed guidance on assessing the impact of development on views." (1.6) Such guidance is particularly important for views which are not included in the List of Local Views. Guidance should address issues such as the length of the prospect and the degree of intrusiveness into the natural vista. Guidance should also give weighting to relative deprivation levels within the neighbourhood of the view. Otherwise, currently deprived areas with impaired views risk being permanently deprived of access to quality views which may have a disproportionately beneficial effect on residents' physical and mental well-being. And deprived areas which currently have no views deemed worthy of protection will be consigned never to have them.	This response to the Local Views Supplementary Planning Document has been prepared by Friends of the River Crane Environment. FORCE is a registered charity, set up in 2003 and with 750 members, most of whom reside in LBRuT. More information on FORCE can be found at www.force.org.uk The Objects of the Charity are to protect and enhance the corridors of the River Crane and Duke of Northumberland's River ("DNR") for the benefit of wildlife and local people. This response is prepared in relation to these Objects. FORCE welcomes the production of a new SPD specifically dedicated to Local Views, as recognition by the Council of LBRuT of the importance of local views to the character of the Borough and the well-being of its residents. We also specifically welcome the inclusion in the Council's list of the "New," Linear view of the Longford River (A2.1) in Hampton. We are, however, deeply concerned that: <ul style="list-style-type: none"> • The "List of Local Views" may be necessary but it is not sufficient as a tool for managing views within the Borough • There is an implicit assumption that if a local view is not included on this List, it has no merit or value as a public amenity or a public-health asset – FORCE strongly REJECTS this assumption • No views whatsoever of any part of the River Crane valley throughout the Borough are included on the List • This omission implies that no part of any view of any public open space along the Crane valley enjoys any protection from development whatsoever, and will not be "a material consideration in determining planning applications" (para 1.4) – FORCE strongly REJECTS this implication <p>1 <u>The "List of Local Views" may be necessary but it is not sufficient as a tool for managing views within the Borough</u> The List is a binary device – a particular View is either on it or not – and is by its nature excluding. The management of views within the Borough requires a more nuanced approach. The criteria for inclusion on the List are not particularly clear. Neither the criteria nor the process for adding hitherto-excluded views to the List are clear. The List provides no incentives for protecting or for improving views which are not already included on the List. Indeed, insofar as inclusion on the List constrains the flexibility of future development, there is a perverse incentive against the addition of new views to the List.</p>	(Added here)

Name / Organisation	Do you think there is scope to include in the SPD more detailed guidance on assessing the impact of development on views? (also includes answers to question 'please tell us more')	Do you have any further general comments about the draft SPD?	Any other supporting or additional information submitted (in relation to general points)
		<p>2 <u>There is an implicit assumption that if a local view is not included on this List, it has no merit or value as a public amenity or a public-health asset</u> FORCE believes that many benefits, in particular mental-health benefits, derive from access to views of nature that are unbroken by development. This is particularly the case in the Crane valley, where actual development, primarily housing, is already seldom more than 50 metres from a natural open space along the entirety of the Crane and the DNR throughout the Borough. Some of this development is in deprived areas, where residents' mental health will particularly benefit from access to and the protection of unbroken views.</p> <p>3 <u>No views whatsoever of any part of the River Crane valley throughout the Borough are included on the List</u> FORCE rejects the implication by omission that views along the River Crane and DNR are not "valued views...including the range of prospects, linear views and townscape views, which are highly important, including in the borough's riverside and open space settings." (1.2) We are disappointed that the Council's consultants Arup did not find in the Crane valley "any new views that merit designation", and believe that their failure to do so undermines the overall credibility of their work.</p> <p>4 <u>This omission implies that no part of any view of any public open space along the Crane valley enjoys any protection from development whatsoever, and will not be "a material consideration in determining planning applications"</u> The SPD states that "The presence of a view will influence the design quality, configuration, height and site layout of new development or extensions to existing developments." (3.4) The clear implication is that without the protection afforded by recognition as a "view", development will be much less constrained. Hence FORCE's concern at the omission of any reference to the Crane valley or the DNR.</p> <p>There is a particular risk that development immediately adjacent to the Crane and DNR, and/or development which includes over-height massing visible above or behind tree-lines, will either compromise the integrity of an existing local view, or prevent the establishment or restoration of a view that has already been compromised by development. This compromised integrity will in turn deprive residents of mental-health benefits, and insofar as visible development makes the spaces less attractive to users, of physical health benefits also.</p> <p>An example is the views from Craneford West Field. Our usage surveys show that upwards of 1,000 visitors per day use the riverside path here. Their view south and southwest from the West Field, from the children's play area and from the riverside path risks being compromised by the proposed developments of the Lockcorp House site and the former Gregg's site. Their view west risks being compromised by inappropriate development of any part of the Council's Depot site and their view northwest by inappropriate development of The Stoop site. None of these views is protected in any way by this SPD.</p> <p>We understand the focus of this SPD on protecting the Borough's many historic views: those from Richmond Park and Richmond Hill, those of the Thames and the Royal Botanic Gardens etc. We would take nothing away from these. But we believe that for the present and the future, the SPD needs to do much more explicitly to protect and promote views within the River Crane valley and the DNR. These are essentially brownfield sites which are being restored to nature, creating new assets for climate-change resilience in terms of biodiversity and flood management. Moreover, these brownfield sites are in some of the more deprived areas of the Borough, where the mental and physical health benefits of access are proportionately greater. Accordingly, the views in these sites merit a much more enlightened, protective, forward-looking approach.</p> <p>To this end we believe that views from Craneford West Field, Mereway Nature Reserve and Kneller Gardens, from Crane Park throughout its length between Meadway in the east and the A314 in the west, including the view northwest from the A316 overbridge and the view of the Shot Tower and Crane Park Island Nature Reserve, and the view from Little Park towards Pevensey are all highly important and merit designation as linear views. In our opinion, these views are "related to the appreciation of the wider landscape...partly or wholly separate from any consideration of the significance of heritage assets." (2.1) [these specific references are also included in table above 'Comments on specific views']</p>	

Name / Organisation	Do you think there is scope to include in the SPD more detailed guidance on assessing the impact of development on views? (also includes answers to question 'please tell us more')	Do you have any further general comments about the draft SPD?	Any other supporting or additional information submitted (in relation to general points)
		We believe that "there is scope to include in the SPD more detailed guidance on assessing the impact of development on views." (1.6) Such guidance is particularly important for views which are not included in the List of Local Views. Guidance should address issues such as the length of the prospect and the degree of intrusiveness into the natural vista. Guidance should also give weighting to relative deprivation levels within the neighbourhood of the view. Otherwise, currently deprived areas with impaired views risk being permanently deprived of access to quality views which may have a disproportionately beneficial effect on residents' physical and mental well-being. And deprived areas which currently have no views deemed worthy of protection will be consigned never to have them.	
Ingrid Hinton	Don't know	Not yet	
J Langrish	Don't know	Good that you are protecting views.	
Joe P	Yes	Generally a well put together and comprehensive document.	
John Keefe (Dr.)	Yes There is a danger of isolating the specified views from their context and surrounding area, and thus the impact of development outside the immediate site or view that would affect the view.	As indicated in previous answer, there is a danger of focusing on the specified and deemed important sites and views (which the all are) at the expense of less regarded but still important sites; sites of the everyday that are important and vital to the well being of their own immediate community and that serve that community in such an 'everyday' manner.	
John Waxman	Yes Need to include guidance that pertains to the river corridors within the Borough e.g River Crane, Lower Duke of Northumberland's River and Whitton Brook, Longford River.	The SPD needs to recognise and protect the visual/aesthetic quality of the Crane Valley's river corridors. There don't appear to be any protected views identified on the River Crane, Lower Duke of Northumberland's River or Whitton Brook, and only limited coverage of the Longford River. These river corridors provide near continuous belts of semi-natural habitat within the borough and the naturalistic vistas need to be valued and protected. Nearby development (particularly high rise development) has the potential to spoil these vistas by intruding visually into these linear green spaces. If you walk through the wooded riverside sections of Crane Park or Little Park (for example) you can 'escape' from the normal sights of the urban environment. Such visually naturalistic 'river corridor' experiences need to be valued and preserved. CVP has many images of places along the river corridor which exhibit this sense of detachment from urbanisation. Here is a link to a video which captures the visual delights of Crane Park: https://www.youtube.com/watch?v=tzQLz2mpiCk	
Judith Anderton	Don't know	Blank	
Juliet Bramwell	Yes	Blank	
Juliet Mills	Don't know	I think it is impressive and shows a great deal of work has gone into it. I like its purpose and hope that our beautiful part of London will be effectively protected from over-development and inappropriate development as a result.	
Lachlan John Finlayson	Yes	Even though St Paul's view was protected, it was still able to be damaged by a new, tall, building. So 'protection' is not sufficient, unless enforced.	
Louise Fluker	No There is a risk of making the document too complex. It also depends when the photograph was taken compared with the date of an application	The proposed additions as regards views from or to Richmond Park, Riverside, the Hill and Town centre seem appropriate and complement the existing views	
Ludovic Leforestier	Yes	In general the borough planning department is anal about little alterations made by private homeowners and yet let developers get away with faux-old developments without character and usually overburdening. We must not repeat mistakes from the past, eg Mortlake high street and take full advantage of once in a lifetime redevelopments such as a Mortlake brewery.	
Matt Hitchmough	No	Average home sale prices in Richmond borough currently stand at £765,107; this is in part a direct consequence of planning restrictions that make house-building at scale next to impossible. I think it is disgusting to court residents' views on *additional restrictions* when already there is no viable pathway for most working-age people renting in the borough to make the transition to home ownership. Please rethink this process.	
Michael Winsor	No	Protect all our views	
Michele Livesey	Don't know	No	
Mike McCutcheon	Don't know	Stand up to the GLC (or whatever it's called now) and stop them imposing on our borough a requirement for: - more housing - more schools when we already school kids from surrounding boroughs and in 10 years time there will apparently (according to The Times) be 1m fewer school kids. You won't have any views left if you cave in.	

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Mrs Hilary Pereira	Don't know Guidance is valuable, but it seems it can be worked around and used by developers to frustrate the good intentions of the planners, as informed by the views of the public.	Generally, an excellent document which helps demonstrate how central the Thames is to prospects and views within the Borough. It is good to see the greater recognition of the prospects from bridges	
Neil Maybin	Don't know	Blank	
Nigel Griffin	Yes Views form a vital part of our environmental appreciation, and can be destroyed if not given sufficient thought or protection	Whilst views in the more tourist oriented parts of the borough are important, insufficient attention has been given to those parts of the borough where they are more important to environmental appreciation and mental health.	
Nigel Muir	Yes	It would be useful if SPD contained details on how the public can respond within the actual document.	
Nuala Orton	Yes	Blank	
Petra Sturton	Don't know	Happy that it is taking place and will protect the unique character of the borough. Against tower blocks and overdevelopment.	
Prasad Shastri	Yes Clear instructions that no development or structure, either temporary or permanent can impede or spoil any of the views listed.	Excellent initiative. Enforcement needs to be strict, fast and diligent.	
Roderick Ellis	Yes Views and sightlines are such an important part of our enjoyment and appreciation of the environment. The views and opportunities to throw your vision to the horizon are hugely beneficial to health and well-being, with access to open space and natural resources.	A very worthwhile and valuable project	
Rosalind Graham Hunt	Yes impact on mental and emotional health from cramped development blocking green views of our Thames	No	
Sam Martin	Yes	The developments proposed for TWickenham riverside will create huge and very worrying parking issues in the west of TWickenham. You can't separate the view concerns from other planning that has blower granted that does not integrate parking ! They are not exclusive to each other	
Sandria Lewindon	No A building has changed the view towards St Paul's (Henry's Mount)	No	
Simon BatcheloR	Don't know	Blank	
Suzannah Herbert	Don't know	I thought it was an excellent document, particularly the new views.	
Tina Bucklow-Waas	Yes The SPD should ensure compliance with the Ham and Petersham Neighbourhood Plan. It should take into consideration issues of biodiversity; heritage and character and any law protecting it.	The SPD in its current form omits protection from the following areas: Ham Common, Ham Lands, Petersham Meadow, Petersham Common and The Avenue. The consultation period has been held throughout the summer holidays and was not widely publicised and interested parties were not asked to participate. The consultation would benefit from more publicity and an extended consultation. No reference is made to the Ham and Petersham Neighbourhood Plan. I would like to invite you to our next Forum.	
Tom Haworth	Yes	I think it is essential. Large buildings can dramatically alter the landscape, and if they are not in keeping with a mostly low rise developed area, will spoil otherwise tranquil views. Further, new developments mustn't remove existing wildlife, eg. Cut down mature old trees. We are in a climate emergency, and need to protect our existing habitats. This should be a key part of the SPD	
Ajit Gill, Environment Agency		Thank you for consulting the Environment Agency on the above document which we received on 22nd July 2022. The River Thames is the single most important landscape feature within our capital city, and the Local Views Supplementary Planning Document (SPD) should address the importance of this. It is a central feature which creates the borough distinctive sense of place. The Environment Agency supports the enhancement of the public realm along the River Thames. We would also recommend similar protections are assigned to the other main rivers within the brough, namely the Crane, the Beverley Brook, Portlane Brook and Duke of Northumberland. We welcome reference to the important of the riverside space setting within the SPD.	

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		<p>We note how the space alongside the River Thames is now more frequently used to celebrate public events that use the River Thames as a London focus. This heightened interest reminds us of the need to consider the highest of standards of riverside design for the public realm.</p> <p>In addition, it is important to prevent development into the River Thames that would damage the openness of the riverscape which is the most valuable landscape feature in London. Realignment of the flood defences, habitat creation and removal of obsolete structures are measures which are identified in the 'Thames River Basin Management Plan'.</p> <p>We recognise that the defences may need to be raised in the future to take account of the effects of climate change. The Council should ensure that development does not take place on or over the defences or that could adversely affect their structural integrity and stability, or reduce the standard of the flood defences in any way. All development should be appropriately set back from the flood defences. We usually seek a 16 metre set back from the tidal defences to any new development.</p> <p>In addition, the potential requirement to raise defences, channel widening, finished floor levels and other measures to manage and mitigate flood risk could impact current views of the rivers within the borough from certain points. As stated above any development proposal should consider the relevant flood management policies with the Richmond Local plan and London plan to ensure properties, people and surround areas as safe from flooding. Where any potential flood mitigation may be seen to compromise the strategic and local vistas, views, gaps and the skyline we would recommend the local planning authority refers to the relevant flood management policies and specifically is deemed to pass both parts of the The Exception Test (National Planning Policy Framework paragraph 164)</p>	
Graeme Fraser-Watson, The Teddington Society		<p>The Teddington Society Planning Group would like to provide the following input to this consultation.</p> <p>We are very supportive of recording important local views that will require protection through the planning process.</p> <p>In addition to the ones already proposed in the draft SPD, all of which we support, we would like the following additional views to be considered for inclusion in this SPD.</p> <p>We have attached a map showing where these views are (TSPG Teddington views) and photos showing the views .</p> <p>The views are:-`</p> <ol style="list-style-type: none"> 1. Teddington Station from the pedestrian footbridge to the south east of the station. (Linear). 2. Peg Woffington Cottage and St Marys from Sainsbury's in the High Street (on the corner of Langham Road and the High Street). (Townscape). 3. St. Albans and St Maryy's from East side of Kingston Road by Ferry Road (Townscape). 4. St. Mary's University Playing Fields & Lensbury from Kingston Road. (Prospect). <p><i>[Map, details + photos are shown in table above 'Comments on specific views']</i></p>	
Katie Parsons, Historic England	<p>Re: Draft Local Views Supplementary Planning Document (SPD)</p> <p>Thank you for your notification of the above consultation. As the Government's adviser on the historic environment Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the planning process. Therefore, we welcome the opportunity to comment on the draft document.</p> <p>Historic England Advice</p> <p>We strongly support the production of this SPD as it will help positively manage the historic environment, improve the understanding of local character, and help implement the requirements</p>		

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	<p>of London Plan policy HC3 <i>Strategic and Local Views</i>.</p> <p>The SPD is clear and detailed; however the actual analysis would be improved by relating the nature of the views back to the historic environment and any heritage value associated with the views identified. The consideration of views in planning decisions is an important aspect of understanding potential impacts upon the setting of designated heritage assets and their significance, the SPD is an opportunity to help draw the relationship between views and heritage together to aid decision making. It is noted that section 2.1 helpfully references Historic England's Setting guidance and makes an overall connection between the relationship between views and heritage significance, but the management guidelines for each view could provide more direction on how heritage is to be treated (where relevant). Alternatively, where this analysis is provided elsewhere, for instance within Conservation Area Appraisals, the SPD could direct readers to these documents.</p> <p>Conclusion</p> <p>In summary we feel that the SPD could go further to draw out the heritage value of identified views where relevant, and how they may form part of or contribute to the setting and significance of designated heritage assets.</p> <p>Finally, we should like to stress that this opinion is based on the information provided by the Council in its consultation. To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposals, which may subsequently arise where we consider that these would have an adverse effect upon the historic environment.</p>		
Duncan McKane, London Borough of Hounslow		<p>Thank you for the email and for the opportunity to comment on the draft Local Views SPD.</p> <p>We have reviewed the draft SPD with conservation colleagues and do not have any comments on the emerging guidance at this time. As per London Plan policy HC3 G, LB Hounslow are keen to collaborate with LB Richmond upon Thames to designate and manage local views which cross borough boundaries, and will continue to do this through duty to cooperate discussions. As such we are keen to engage with officers on the continuing development of LB Richmond's emerging local plan, including the development of emerging Policy 31 Views and Vistas and any other associated policies. We are content at this stage to review the preferred policy wording at your forthcoming Regulation 19 consultation, and to agree positions through a statement of common ground if both parties feel this to be necessary.</p>	
Mark Knibbs (Avison Young – UK) on behalf of St George Plc and Marks and Spencer Group Plc (Kew Retail Park)		<p>On behalf of our clients, St. George Plc ('SG') and Marks and Spencer Group Plc ('M&S'), Montagu Evans LLP ("we", "us", "ME") write to make representations to the London Borough of Richmond upon Thames (LBRuT), in respect of the Consultation Draft of the Local Views Supplementary Planning Document (SPD).</p> <p>As LBRuT will be aware, SG and M&S are currently in discussions with LBRuT Officers regarding the redevelopment of Kew Retail Park. This letter follows our previous written representations in relation to the Regulation 18 draft Local Plan and Urban Design Study (2021) in January 2022, prepared jointly with Avison Young and JTP.</p>	

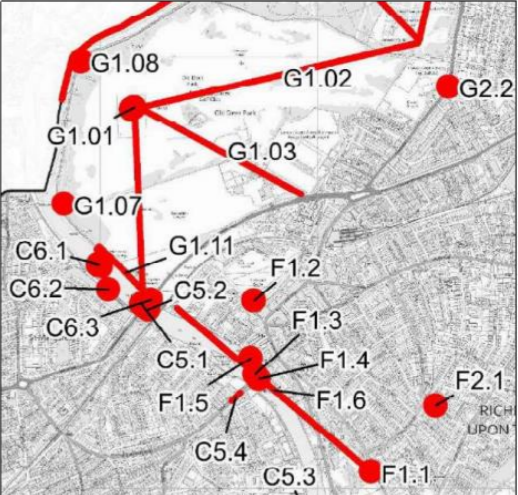
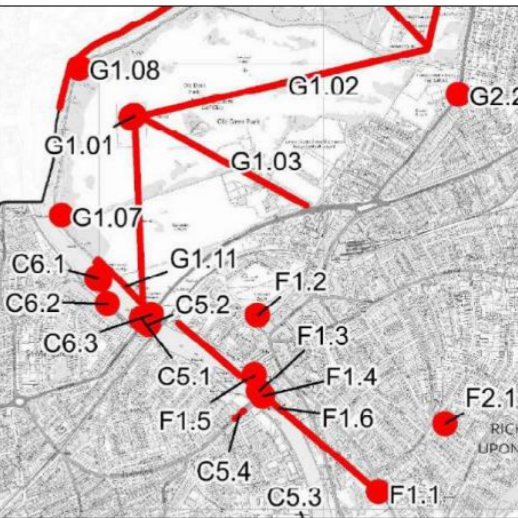
Name / Organisation	Do you think there is scope to include in the SPD more detailed guidance on assessing the impact of development on views? (also includes answers to question 'please tell us more')	Do you have any further general comments about the draft SPD?	Any other supporting or additional information submitted (in relation to general points)
		<p>1. General Principles</p> <p>In general, we are in support of the principles set out within the draft SPD, agreeing that Richmond and its surrounding environs is a historic borough, with important views which require careful management and protection. Not only are views and vistas important in terms of understanding a place (for example throughout Kew Gardens World Heritage Site), but they also contribute to the setting and overarching significance of the borough's high concentration of heritage assets, including but not limited to World Heritage Sites, Registered Parks and Gardens, conservation areas and listed buildings.</p> <p>Early in the draft SPD, LBRuT state that the consultant, Arup, were commissioned to carry out an analysis of the borough's views alongside their work on the Urban Design Study (2021) ("UDS"). The UDS supported the preparation of the Regulation 18 Draft Local Plan. It is stated within the draft SPD that the UDS "sets out the details of valued views in relation to each identified character area, including the range of prospects, linear views and townscape views which are highly important" (Para. 1.2 Page 5). As we set out in our initial written representation on the Regulation 18 draft Local Plan, including an assessment of the Urban Design Study, the detail provided within Arup's study is not sufficient and does not provide the appropriate level of detail to support the parameters set out within the draft policies within the emerging Development Plan. We disagree with LBRuT's statement that the Urban Design Study sets out the 'details of valued views', as the Study only identifies 'valued views' within each character area at the highest level, without providing a description of the view and valued features within it. For example, in relation to the Kew Residential Area, the Urban Design Study states (Page 174):</p> <p><i>Valued views and vistas include:</i></p> <ul style="list-style-type: none"> • the view along the tree-lined approach to the Station, encompassing the large, detached villas of Lichfield Road; • views to the pagoda in Kew Gardens from Kew Road. <p>It is noted that such views are not identified within the Draft Local Views SPD. Whilst the UDS references the Guidelines for Landscape and Visual Impact Assessment (3rd Edition) (GLVIA) 2013, it does not follow the correct approach in identifying the visual amenity of each identified viewpoint. Seeing as the draft Local Views SPD draws heavily on the information set out within the UDS, omitting such information directly impacts on the detail set out within the SPD document, as well as lacks crucial information which will help guide future development throughout the borough. As defined by GLVIA, visual amenity is:</p> <p><i>The overall pleasantness of the views people enjoy of their surroundings, which provides an attractive visual setting or backdrop for the enjoyment of activities of the people living, working, recreating, visiting or travelling through an area.</i></p> <p>We turn to this point again later in this consultation response.</p> <p>In Para. 2.1 of the draft SPD, LBRuT state Arup have undertaken a 'detailed exercise, based on their site visits as well as through desktop research, such as reviewing Conservation Area Appraisals, Registered Park & Gardens etc. to recommend whether existing views are intact and/or should be amended, and whether there are any new views that merit designation'. As such work, undertaken by Arup, forms part of the evidence base supporting the draft SPD, and as the work is not included within the UDS (given previous concerns with the level of information provided within it), we would anticipate such research/evidence is published on the LPA's website for review as part of the consultation process relating to the adoption of this draft SPD. At present, the lack of information provided within the UDS and the reliance of its material/ findings in regard to the drafting of the Local Views SPD, the SPD must be considered unsound.</p> <p>2. Consultation</p> <p>Within the introduction of the draft SPD, LBRuT state that the consultation responses on the draft will be analysed, and changes made to the final version where appropriate. In Para. 1.6, LBRuT go on to state, consulting on the draft PSD is the first step in developing the Local Views SPD, with the council intending that there will be further work on this topic and are keen to hear views on 'view management' and whether there is scope to include in the SPD more detailed guidance on 'assessing the impact of development on views'.</p>	

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		<p>We cover points regarding more detailed guidance and development management within the 'Richmond's Local Views' section below, though we note that if further work is carried out so to support the draft SPD, then we would expect such work to be available for comment as part of a new consultation period on an updated draft SPD document. As per Part 5 (17) of the Town and Country Planning (Local Development) Regulations 2004, it is a requirement for local planning authorities to make copies of the SPD document available for public inspection. If therefore, a future version(s) of the Local Views SPD is materially different from that presented as part of this consultation period, then a further period of consultation will be required to allow for public comment.</p> <p>3. Policy Para. 1.5 of the draft SPD states that the SPD has been designed to supplement the draft Policy 31 in the borough's emerging new Local Plan. As per our comments on the Regulation 18 Draft Local Plan, we find draft Policy 31 of the emerging new Local Plan unsound and too prescribed, with elements of the draft policy not conforming with the London Plan (2021), which states that development should not harm, and should seek to make a positive contribution to, the characteristics and compositions of Strategic Views and their landmark elements.</p> <p>For reference we include the draft wording of Policy 31 below with our proposed amendments marked as tracked changes as set out in Avison Young's Reg 18 consultation response:</p> <p><i>Policy 31. Views and vistas</i></p> <p><i>A. The Council will protect the quality of the identified views, vistas, gaps and the skyline, all of which contribute significantly to the character, distinctiveness and quality of the local and wider area, by the following means:</i></p> <ol style="list-style-type: none"> <i>1. protect the quality of the views and vistas as identified on the Policies Map, and for any proposal affecting a designated/identified view/vista on the Policies Map demonstrate this through the submission of such through computer-generated imagery (CGI) and visual impact assessments as required by Policy 44 Design process;</i> <i>2. Require clear and convincing justification for resist development which interrupts, disrupts or detracts from strategic and local vistas, views, gaps and the skyline;</i> <i>3. require developments whose visual impacts extend beyond that of the immediate street to demonstrate how views are protected or enhanced, and reflect the relevant character area design guidance in the Urban Design Study; 4. require development to respect the setting of a landmark, taking care not to create intrusive elements in its foreground, middle ground or background;</i> <i>5. Where appropriate, seek improvements to views, vistas, gaps and the skyline, particularly where views or vistas have been obscured;</i> <i>6. Preserve or, where appropriate, enhance, seek improvements to views within Conservation Areas, which: <ol style="list-style-type: none"> <i>a. are identified in Conservation Area Statements and Studies and Village Plans;</i> <i>b. are within, into, and out of Conservation Areas;</i> <i>c. are affected by development on sites within the setting of, or adjacent to, Conservation Areas and listed buildings</i> </i> <p><i>National Planning Policy Framework 2021 (NPPF), LVMF and Guidance</i></p> <p>Section 2 of the draft SPD concerns the planning context regarding local views. Reference is made to Section 16 (Conserving and Enhancing the Historic Environment) of the NPPF, specifically Para. 189. Whilst we acknowledge that a high proportion of views across the borough will have a heritage focus, i.e. to and from a designated heritage asset/ a planned view within an historic setting/landscape, views are not necessarily solely defined by their historic association with a heritage asset or designation and can also be townscape views along valued streetscapes. As such, reference should be made within this section of the SPD to Chapter 12: Achieving Well-Designed Places, which seeks to ensure future development is visually attractive and be of good architectural quality which are sympathetic to local character and the surrounding built environment.</p>	

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		<p>Furthermore, reference is made to Historic England guidance, namely GPA3: The Setting of Heritage, which is welcomed and supported. However, no reference is made to the National Design Guide (2021), further highlighting that the draft SPD has been written purely based on heritage considerations, rather than a more holistic approach to the designation and management of views in relation to the built environment. Importantly, the National Design Guide highlights that well-designed developments and places are influenced by views, vistas and landmarks. This should be referred to within the SPD.</p> <p>4. Richmond's Local Views (Visual Amenity and Development Guidance)</p> <p>Part 3 of the draft SPD concerns the borough's identified viewpoints, identifying Prospects, Linear and Townscape Views. Specifically at Para. 3.4, LBRuT state that the presence of a view will influence the design quality, configuration, height and site layout of new development or extensions to existing developments. Whilst we agree that the presence of a locally identified/ designated view may influence the scale, height and massing of a proposed development, high quality architectural design should be encouraged and, in most cases, required throughout the borough and should not be reserved for where a locally designated view is identified. Furthermore, a locally designated view should not negate future development coming forward which may be visible in such views. This general theme appears to run through all elements of the draft SPD and requires redrafting so to correspond with regional and national planning policies.</p> <p>As stated above, throughout Part 3 of the draft SPD, LBRuT omit any guidance on development management and fail to identify specific elements which make a positive contribution to an identified view, namely those elements which are most valued and require protection/ careful management. Within each viewpoint assessment, further information is therefore required in relation to 'visual amenity'. Owing to the omission of such information, we question whether the publication of the draft SPD is premature and recommend that each viewpoint assessment is revised to include the following (as per viewpoint identification/ assessment set out within the LVMF):</p> <ol style="list-style-type: none"> 1. Description of the View (including the identification of landmarks and important elements which contribute to visual amenity) 2. Visual Management Guidance <ol style="list-style-type: none"> a. Foreground and Middle Ground b. Background <p>In specific regard to identified views across the Kew Gardens and Riverside area, whilst we are generally supportive of the location and orientation of each viewpoint identified, we are concerned with the lack of information within each viewpoint assessment and the omission of key aspects/ features which make up the view. We provide an overview of our key comments on views throughout the area in Table 1 below. We only identify views within the Kew Gardens and Riverside, and Kew Residential areas, though our comments may be applied more generally across each viewpoint identified.</p> <p><i>[Table 1 comments are included in table above 'Comments on specific views']</i></p> <p>5. Summary</p> <p>In summary, we are generally supportive of the principles set out within the draft Local Views SPD and the identification of views across the borough. We also support the draft SPD's closing remarks concerning the importance of pre-application engagement with LBRuT/ the Design Review Panel, as well as the identification of important local views by applicants proposing major development within the borough. However, we are concerned with the restrictive approach to future/ emerging development throughout the borough, culminating in the wording of draft Policy 31: Views and Vistas, as set out within the Regulation 18 draft Local Plan.</p> <p>We are also concerned with the lack of reference to design policies and guidance set out in national policy and guidance (namely Chapter 12 of the NPPF and National Design Guide), as well as London Plan policies and the framework for the identification of views across the capital, as set out in the LVMF. We recommend that LBRuT reconsider the level of detail provided within the draft SPD, and provide further, analytical development management guidance for each viewpoint identified.</p> <p>In our judgement our recommendations are necessary to ensure that the Draft SPD is consistent with the development plan and the methodology that is set out in early in the document.</p>	

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		<p>We therefore respectfully ask that the necessary changes are made in line with our comments. We trust these representations are clear and helpful. We would welcome the opportunity to assist you further in the preparation and drafting of the Local Views SPD, should there be a requirement to do so.</p>	
<p>Martha Bailey, London Historic Parks and Gardens Trust</p>	<p>Yes The document would benefit from a short chapter giving further details on how the impact of development on views should be assessed, providing links to/extracts from relevant sections of the London View Management Framework and Guidelines for Landscape and Visual Impact Assessment published by the Landscape Institute (Chapter 6 of the 3rd edition is particularly useful.)</p>	<p>I write as a member of the Planning & Conservation Working Group of the London Historic Parks & Gardens Trust (trading as London Parks and Gardens (LPG)). LPG is affiliated to The Gardens Trust (TGT, formerly the Garden History Society and the Association of Gardens Trusts), which is a statutory consultee in respect of planning proposals affecting sites included in the Historic England (English Heritage) Register of Parks and Gardens of Special Historic Interest.</p> <p>LPG is the gardens trust for Greater London and makes observations on behalf of TGT in respect of registered sites, and may also comment on planning matters affecting other parks, gardens and green open spaces, especially when included in the LPG's Inventory of Historic Spaces (see https://londongardenstrust.org/conservation/inventory/) and/or when included in the Greater London Historic Environment Register (GLHER). We take note of all planning protections including sites within Conservation Areas, Green Belt or any other planning protection including protected views and the settings of historic sites in accordance with the NPPF.</p> <p>LPG is supportive of this Supplementary Planning Document and the protection and consideration it may afford to important views in Richmond provided adjustments are made.</p> <p>LPG agrees the importance that views into, across and out of a space have in contributing to the significance/experience of Registered Parks and Gardens. Whilst there are several views from within and out of RPGs (Richmond Park and Bushy Park are mentioned in particular) we would welcome the inclusion of additional views from within the RPGs out into the wider landscape. One example might be the view from Marble Hill House down to and across the Thames, in the opposite direction to the view up to Marble Hill House on page 28. [these specific references are also included in table above 'Comments on specific views']</p> <p>LPG encourages the document to be made as comprehensive as possible, both through the addition of any new views which are brought to light during the consultation process and through expanding the details given in the 'Visual Management Guidance' section where possible, as many of these descriptions are fairly sparse.</p> <p>There is inconsistency in the document when pointing up where parks and gardens are designated; designated status is at times mentioned in the 'Description of View' section and/or in the 'Reference Policy' but is sometimes omitted (see for instance Twickenham Bridge north-east, page 29 – the designated status of the Old Deer Park is not noted.) This needs to be amended to ensure clarity of message and enforceability of protections in the future.</p> <p>LPG notes that many coordinates are currently marked n/a so it may be that they are due to be added when the final draft is produced. However from the perspective of navigating the document LPG recommends coordinates and postcodes be included throughout to help readers locate the view on GIS/google maps for the final version.</p> <p>The LPG inventory is regularly updated and welcomes comments and new information – please do search using our functionality by Local Authority. Entries on this database can become material considerations in a planning application.</p>	
<p>Janice Burgess, National Highways</p>		<p>Thank you for your notification dated 22 July 2022, inviting National Highways to comment on the draft Supplementary Planning Documents; seeking responses no later than 05 September 2022.</p> <p>National Highways has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such National Highways works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.</p>	

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		<p>We will therefore be concerned with proposals that have the potential to impact the safe and efficient operation of our network.</p> <p>National Highways have undertaken a review of the documents and raise no concerns.</p>	
Sharon Jenkins, Natural England		<p>Thank you for your consultation request on the above dated and received by Natural England on 22nd July 2022. Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development. Our remit includes protected sites and landscapes, biodiversity, geodiversity, soils, protected species, landscape character, green infrastructure and access to and enjoyment of nature. Whilst we welcome this opportunity to give our views, the topic of the Supplementary Planning Document does not appear to relate to our interests to any significant extent. We therefore do not wish to comment. Should the plan be amended in a way which significantly affects its impact on the natural environment, then, please consult Natural England again.</p> <p>Strategic Environmental Assessment/Habitats Regulations Assessment</p> <p>A SPD requires a Strategic Environmental Assessment only in exceptional circumstances as set out in the Planning Practice Guidance here. While SPDs are unlikely to give rise to likely significant effects on European Sites, they should be considered as a plan under the Habitats Regulations in the same way as any other plan or project. If your SPD requires a Strategic Environmental Assessment or Habitats Regulation Assessment, you are required to consult us at certain stages as set out in the Planning Practice Guidance.</p>	
Paul Velluet (private capacity as a resident/Garrick's Temple to Shakespeare Trust)		<p>Thank you for your letter of the 22nd July, addressed to me as Acting-Chair of the Garrick's Temple to Shakespeare Trust inviting the Trust's response to your consultation on the the draft Local Views Supplementary Planning Document.</p> <p>In welcoming the consultation, may I confirm that my response to the consultation on behalf of my fellow Trustees is confined to Item 23 on page 7 of the attached document and is specifically related to already adopted Prospect View A1.1. My response as set out in relation to Items 1 to 22 in the attached document is submitted in an independent capacity as a resident of the Borough since 1948; as a past member of the Council's former Conservation Areas Advisory Committee; as a member of the Richmond Society and as a former chairman of the Society and its Conservation, Development and Planning Sub-Committee; as member of the Twickenham Society; as a founding member of the Richmond Local History Society – currently serving as its President; as a member of original Steering Group for the Thames Landscape Strategy; and as former Assistant Regional Director in English Heritage's London Region until 2004.</p> <p>I very much regret that lack of adequate time has precluded my providing a detailed response to the draft document. However, I trust that the attached document may serve as an interim response, focusing on those important views in the Borough with which I am long familiar which appear to be missing from the schedule of already adopted and proposed Prospect, Linear and Townscape Views in your draft document, in the keen hope that full consideration might be given to their formal inclusion. Please do not hesitate to contact me if you or your colleagues have any queries.</p> <p><i>[Items 1 to 22 are included in table above 'Comments on specific views']</i></p>	
Peter Willan, Friends of Richmond Green		<p>INTRODUCTION</p> <p>This response is written on behalf of the Friends of Richmond Green. FoRG are a long established amenity group covering around 350 households around Richmond Green and Little Green and in the vicinity down to the river Thames. We aim to preserve the special qualities, character and setting of the historic Richmond Green. The Green is a wonderful setting with many historic views and vistas and is a major attraction for people visiting the town, its shops and offices and is much appreciated by the many residents in the vicinity of the Richmond Green as well as residents in the town's wider reaches. We believe Harm to the Site and setting should be avoided at all costs. FoRG is a member of the Town Centre Group and Old Deer Park Working Group, both of which engage fully with the Council. We work closely with the Council's Parks and Tree Teams.</p>	<p>ANNEX SELECTED VIEWS FROM DRAFT SPD RELEVANT TO THE RICHMOND GREEN, RICHMOND RIVERSIDE, CENTRAL RICHMOND AND RICHMOND HILL CONSERVATION AREAS</p>

Name / Organisation	Do you think there is scope to include in the SPD more detailed guidance on assessing the impact of development on views? (also includes answers to question 'please tell us more')	Do you have any further general comments about the draft SPD?	Any other supporting or additional information submitted (in relation to general points)
		<p>The Richmond Green, Richmond Riverside, Central Richmond and Richmond Hill Conservation Area Studies are being refreshed with the consultations just ended. We understand the Old Deer Park Conservation Area will be refreshed in the near future along with other Conservation Area Studies in the borough. It will be important to integrate the Local Views SPD with the five Conservation Area Statements and Management Plans.</p> <p>Some of the adopted and new proposed views require gaps and some of these are currently impeded by trees and vegetation which we identify in this response.</p> <p>We have approached the subject of views in the context of the Local Plan Policy LP5 and the relevance of the views to the setting of Heritage assets and to visual amenity. LP5 Views and Vistas says 'Seeks to protect and improve the quality of views, vistas, gaps and the skyline which contribute significantly to the character and quality of the local and wider area.'</p> <p>For ease of reference we include in the Annex the data sheet for each of the adopted and new views proposed. The Old Deer Park Working Group are also responding to the consultation and we recommend cross referencing with their response. Their focus is on the Old Deer Park Conservation Area but when discussing Views they should not be confined to one or other Conservation Area.</p> <p>In summary, the FoRG support the continuation of the adopted views and the proposed new views listed in the draft Local Views SPD and recommend some additional linear and landscape views for consideration. We also recommend ongoing maintenance of gaps in the landscape to preserve the views; we have sought to identify where these are currently impeded or are likely to be.</p>	 <p>Figure 1 Extracted from Local Views Map July 2022 for consultation</p> <p>C5.1 Twickenham Bridge (north-east), Prospect C5.2 Twickenham Bridge (south-east), Prospect C6.1 Richmond Lock & Weir, Prospect, C6.2 St Margarets Riverside, Prospect C6.3 View of the Great Pagoda St Margarets, Linear G1.1 Kings Observatory, Old Deer Park, Linear G1.2 King's Observatory towards Kew Gardens, Linear G1.3 Kings Observatory towards Richmond Town Centre, Linear G1.11 Old Deer Park Riverside, Prospect</p>
Peter Willan, Old Deer Park Working Group		<p>INTRODUCTION</p> <p>This response is written on behalf of the Old Deer Park Working Group. The ODPG comprises five societies: The Richmond Society, The Kew Society, The Friends of Richmond Green, The Friends of Old Deer Park and The St Margarets Estate Residents Association. The Group was established in 2012 to encourage the effective conservation and improvement of the Old Deer Park. We work closely with the Council's Parks and Tree Teams on several projects to preserve and enhance the ODP and are in the process of progressing with the Council a Tree Planting Plan for the ODP, which includes recognising views and vistas.</p> <p>Stretching from Richmond to Kew Gardens, the Old Deer Park has evolved over more than seven centuries from a private royal domain to the metropolitan open space it is today. Views and vistas to and from and within the Old Deer Park and to/from are a very important feature of the park and their status as a conservation area.</p> <p>The Kim Wilkie Strategy for the Crown Estate, who owns the ODP, identified a number of views and vistas from the King's Observatory and these have been referred to in the ODP SPD 2018. The adopted and proposed new views in the draft Local Views SPD takes account of only some of these views. In this response we refer to these additional linear views and also a 360 degree landscape view from within the ODP, which we explain later. We understand that the ODP Conservation Area Study will be refreshed in the near future along with other Conservation Area Studies in the borough. It will be important to integrate the Local Views SPD with the ODP Conservation Area Statement and Management Plan.</p> <p>Some of the adopted and new proposed views require gaps and some of these are currently impeded by trees and vegetation which we identify in this response.</p> <p>We have approached the subject of views in the context of the Local Plan Policy LP5 and the relevance of the views to the setting of Heritage assets and to visual amenity. LP5 Views and Vistas says 'Seeks</p>	<p>ANNEX SELECTED VIEWS FROM DRAFT SPD RELEVANT TO THE OLD DEER PARK</p>  <p>Figure 1 Extracted from Local Views Map July 2022 for consultation</p> <p>C5.1 Twickenham Bridge (north-east), Prospect C5.2 Twickenham Bridge (south-east), Prospect</p>

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		<p><i>to protect and improve the quality of views, vistas, gaps and the skyline which contribute significantly to the character and quality of the local and wider area.'</i></p> <p>For ease of reference we include in the Annex the data sheet for each of the adopted and new views proposed. The Friends of Richmond Green are also responding to the consultation and we recommend cross referencing with their response. Their focus is on the Richmond Green and Riverside Conservation Areas but when discussing Views they should not be confined to one or other Conservation Area.</p> <p>In summary, the ODPG support the continuation of the adopted views and the proposed new views listed in the draft Local Views SPD and recommend some additional linear and landscape views for consideration. We also recommend ongoing maintenance of gaps in the landscape to preserve the views; we have sought to identify where these are currently impeded or are likely to be.</p> <p>SELECTED VIEWS FROM DRAFT SPD RELEVANT TO THE OLD DEER PARK C5.1 Twickenham Bridge (north-east) Prospect C5.2 Twickenham Bridge (south-east) Prospect C6.1 Richmond Lock & Weir Prospect C6.2 St Margarets Riverside Prospect C6.3 View of the Great Pagoda St Margarets Linear G1.1 Kings Observatory, Old Deer Park Linear G1.2 King's Observatory towards Kew Gardens Linear New G1.3 Kings Observatory towards Richmond Town Centre Linear New G1.11 Old Deer Park Riverside Prospect New</p>	<p>C6.1 Richmond Lock & Weir, Prospect, C6.2 St Margarets Riverside, Prospect C6.3 View of the Great Pagoda St Margarets, Linear G1.1 Kings Observatory, Old Deer Park, Linear G1.2 King's Observatory towards Kew Gardens, Linear G1.3 Kings Observatory towards Richmond Town Centre, Linear G1.11 Old Deer Park Riverside, Prospect</p>
Susie Taylor, Royal Botanic Gardens, Kew	Yes	<p>General comments As stated above, RBGK is generally supportive of the draft Local Views SPD. RBGK agrees there is a need to provide further guidance on Local Plan views for the public and developers/applicants through supplementary planning guidance to ensure the landscape and townscape within the Borough is appropriately protected.</p> <p>RBGK welcomes the inclusion of the new prospect view, Kew Gardens and Riverside, Parish Church of St Anne, Kew Green. RBGK also welcomes the inclusion of new townscape view Kew Road towards the Great Pagoda.</p> <p>Consultation As required by draft Local Plan Policy 31, RBGK is supportive of any proposal affecting a designated/identified view or vista having to submit computer-generated imagery and visual impact assessments as part of an application. This is particularly relevant for Kew Gardens and the World Heritage Site, which is highly sensitive to the impacts of surrounding development. RBGK also requests that they are consulted as part of any future proposals that may affect the site.</p> <p>Proposed amendment RBGK has suggested the following changes to the introductory text on pages 9 and 10, in order to strengthen the links between the SPD and the RBGK World Heritage Site Management Plan –</p> <p><u>Current text</u></p> <p><i>Royal Botanic Gardens Kew World Heritage Site Management Plan (2020-2025)</i></p> <p><i>The World Heritage Site Management Plan provides an invaluable tool for the continued protection, conservation and presentation of the Royal Botanic Gardens, Kew, in terms of its Outstanding Universal Value (OUV). The WHS Management Plan has been prepared at a time of increased development activity in the wider London context beyond the WHS, as reflected in the number of planning applications coming forward for major development along the Great West Corridor in Brentford. The WHS has a very specific set of relationships with its setting, which are an integral part of its design, its experience and therefore of its OUV.</i></p> <p><i>One of the key attributes of the Royal Botanic Gardens is 'Strongly enclosed sense of 'otherworldliness' within the high walls and tree shelterbelts;' Protecting this attribute is a key element of the Management</i></p>	

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		<p><i>Plan. The landscape character of the Gardens is based upon the combination of natural landscape, rural pastures and flood meadows with formally designed landscapes of avenues and vistas. Kew Gardens' relationship to the wider landscape is a key aspect of its significance as a World Heritage Site and these external links need to be retained and enhanced where possible. The long-term safeguarding of Kew Gardens' historic spatial structure demands a careful, strategic process to ensure key views and vistas from the Gardens are protected from development that would mar them through visual intrusion. The Local Views SPD sets out a number of key views within the Gardens that need protection. The duty to protect the setting and OUV of Kew Gardens does not rest with Richmond alone but also with adjacent boroughs.</i></p> <p><u>Proposed text</u></p> <p><i>Royal Botanic Gardens, Kew World Heritage Site Management Plan (2020-2025)</i></p> <p><i>The World Heritage Site Management Plan provides an invaluable tool for the continued protection, conservation and presentation of the Royal Botanic Gardens, Kew, in terms of its Outstanding Universal Value (OUV). The WHS Management Plan has been prepared at a time of increased development activity in the wider London context beyond the WHS, as reflected in the number of planning applications coming forward for major development along the Great West Corridor in Brentford. The WHS has a very specific set of relationships with its setting, which are an integral part of its design, its experience and therefore of its OUV. These are clearly set out in detail in the Management Plan and will need to be taken into account, in addition to the views contained in this SPD.</i></p> <p><i>One of the key attributes of the Royal Botanic Gardens, Kew is 'Strongly enclosed sense of 'otherworldliness' within the high walls and tree shelterbelts;' Protecting this attribute is a key element of the Management Plan and consequently, wider national and London-wide planning policy. The landscape character of the Gardens is based upon the combination of natural landscape, rural pastures and flood meadows with formally designed landscapes of avenues and vistas. Kew Gardens' relationship to the wider landscape, including its separation from that landscape, is a key aspect of its OUV as a World Heritage Site and these external links and levels of separation need to be retained and enhanced where possible. The long-term safeguarding of Kew Gardens' historic spatial structure demands a careful, strategic process to ensure key views and vistas from the Gardens are protected from development that would mar them through visual intrusion. The Local Views SPD sets out a number of key views within the Gardens that need protection, further views and qualities of setting are set out in the Management Plan; these will also need to be addressed by development proposals. The duty to protect the setting and OUV of the Royal Botanic Gardens, Kew WHS does not rest with Richmond alone but also with adjacent boroughs, the Greater London Authority and other decision makers.</i></p>	
Julia Frayne, The Royal Parks		<p>We welcome the Local Views SPD which clearly and accessibly details protected and locally important views and is a valuable reference for planning purposes.</p> <p>We welcome proposals for additional views to be protected, and specifically inclusion of views from the Royal Parks, as such protection will enhance TRP's ability to maintain historic vistas. As managers of the Longford River we also welcome recognition of this historic feature.</p>	
Katie Smyth, Surrey County Council		<p>Thank you for consulting Surrey County Council as the Minerals and Waste Planning Authority in relation to the Draft Local Views SPD and Draft Refuse and Recycling Storage Requirements SPD consultations.</p> <p>Please note we have no comments to raise in relation to the above consultation.</p>	
Richard Carr, Transport for London		<p>Draft Local Views Supplementary Planning Document (SPD)</p> <p>Thank you for consulting Transport for London (TfL). I can confirm that we have no comments to make on the draft SPDs</p>	
Judith Pearson, The Friends of Richmond Park		<p>I am responding on behalf of The Friends of Richmond Park ("FRP"). FRP was formed in 1961 and was registered as a charity in 2009. Its objects are: (1) to promote the conservation, protection and improvement of the natural and physical environment of Richmond Park (the "Park") and its peace and natural beauty for the benefit of the public and future generations, including by seeking to limit the adverse effects on the Park of policies, developments and activities</p>	

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		<p>which may damage the attributes of the Park set out in (2) below; and (2) to advance the education of the public (i) in relation to the Park's status as a National Nature Reserve, a Site of Special Scientific Interest, a Special Area of Conservation and a Conservation Area and (ii) generally in relation to the conservation, protection and improvement of the Park. FRP currently has about 3,600 members.</p> <p>We support the aims and content of the Local Views Supplementary Planning Document, including in particular the importance of protecting the prospects and linear views in and from Richmond Park.</p>	
Tim Catchpole, Mortlake with East Sheen Society		<p>I am writing on behalf of the Mortlake with East Sheen Society to comment on your draft Supplementary Planning Document on Local views. Your draft is well crafted. We have a few comments as follows:</p> <ol style="list-style-type: none"> 1. In your section on the Planning Context you indicate your current Policy C5, vis. "The Council will... protect the quality of the views and vistas as identified on the Policies Map." Your website states: "The Council's Policies Map (formerly the Proposals Map) will be updated to reflect the Local Plan adopted in July 2018 and March 2020." We have searched everywhere on your website for this map and are unable to find it. Nor can we find the former Proposals Map which is presumably still valid if the Policies Map has still not yet emerged. We would be grateful for clarification from you in this regard. 2. In the absence of a Policies Map your consultation map of Boroughwide Local Views dated July 2022 can suffice but needs improvement as follows: - Some of the linear views are not shown, e.g. E1.2 Ham Common to Ham House, G1.5 Kew Gardens to Syon House, H1.3 Chiswick Bridge to St Matthias; - The label for E3.1 King Henry's Mound would be better positioned at the Mound rather than at Roehampton Gate; - The river ideally needs to be highlighted in light blue and the opposite banks in LB Hounslow and RB Kingston need to be included (see comment 3 below); - Likewise the open spaces ideally need to be highlighted in light green. 3. We are particularly concerned about the riverside views. Your document makes no reference to any liaison with LB Hounslow and RB Kingston about their protected views. The Council cannot be expected to assess development proposals in terms of their impact on the Richmond Borough views only; views from the opposite bank must be included. Likewise landmarks on the opposite bank such as Syon House and the Steam Museum, which are referred to in your document, must be highlighted. Your Boroughwide map appears to be floating in a vacuum as if LB Hounslow and RB Kingston do not exist. 4. We now turn to our part of the Borough, namely the historic Parish of Mortlake with East Sheen (from which our Society takes its name). The Parish extends from the Mortlake riverside across a flat landscape into East Sheen where it then slopes upwards towards Richmond Park – and it includes one third of the Park. Notable local landmarks that feature in views are St Mary's Church (Mortlake), the Maltings on the Stag Brewery site and the White Lodge in Richmond Park (home of the Royal Ballet School). We note that your draft SPD Boroughwide Local Views map (extract below) shows the following views in our area: E3.1 King Henry VIII's Mound – linear view to St Pauls Cathedral E3.3, 4 and 5 – prospect views, also linear from Sawyers Hill to the White Lodge in Richmond Park H1.2 Chiswick Bridge – prospect view looking east H1.4 The terrace, Mortlake Riverside – prospect view I4.1 Priest's Bridge – townscape view of the Beverley Brook. 	

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