

Summaries of responses received to the [Pre-Publication Local Plan](#) consultation and the Council's response



Note that responses, as received (in full), have been published on the [Council's website](#), and the system for numbering of comments has been retained within this document for ease of reference.

**1. List of all respondents to the public consultation**

Please note, the responses below are not alphabetically ordered or in any other order of priority.

Name / Organisation
Caroline Brock, Kew Society
Jenine Langrish
Myrna Jelman
Cllr David Linnette
Richard Geary
Heather Mathew, Richmond CVS
Helene Jelman
Dale Greetham, Sport England
Katharine Fletcher, Historic England
Charles Pineles, Planning Spokesman, Richmond Society
Peter Willan, Old Deer Park Working Group
Celeste Giusti, Greater London Authority on behalf of Mayor of London
Robert Leadbetter, Hon. Director Hampton and Kempton Waterworks Railway
Robert Deanwood, Amec Foster Wheeler on behalf of National Grid
Alison Mackay, Colliers on behalf of Greggs Plc
Tom Sadler, Bilfinger GVA on behalf of Defence Infrastructure Organisation
Judith Livesey, NLP Planning on behalf of St Paul's School
James Togher, Environment Agency
William Mortimer
Tim Catchpole, Planning Representative Mortlake with East Sheen Society
Andrew Dorrian, Transport for London
Rachel Botcherby, Planning Advisor, London and South East National Trust

Name / Organisation
Cllr Martin Elengorn, Environment Spokesperson Richmond upon Thames
Liberal Democrat Councillors Group
Rob Gray, Friends of the River Crane Environment (FORCE)
Liz Ayres, Richmond Clinical Commissioning Group
Wendy Crammond, Co-Chair Kew Residents Association
Ben Mackworth-Praed, on behalf of the Barnes Community Association
Kevin Goodwin, RPS CgMs for Goldcrest Land
Sarah Stevens, Turleys for British Land
Paul Massey
Tim Lennon, Borough Coordinator Richmond Cycling Campaign
Matthew Eyre, RPS CgMs on behalf of Historic Royal Palaces (HRP)
Brian Willman, Chair Ham and Petersham Neighbourhood Forum
Mike Allsop, Committee member Strawberry Hill Residents' Association
Geoff Bond, Chair Ham and Petersham Association
George Burgess, Indigo Planning on behalf of Beechcroft Developments Ltd
Neil Henderson, Gerald Eve on behalf of Reselton Properties Ltd
Alice Roberts, CPRE London
Janet Nuttall, Natural England
Tim Sturgess, Bilfinger GVA on behalf of The Lady Eleanor Holles School
Unity Harvey
David Taylor
Sam Hobson, Quantum Group
Richard Barnes, The Woodland Trust
Lucy Owen, Port of London Authority

Name / Organisation
Kevin Scott, Kevin Scott Consultancy Ltd on behalf of Port Hampton Estates Limited
Sarah Dixey, London Borough of Wandsworth
Katharine Harrison, Surrey County Council
Mike Mills, Firstplan Ltd on behalf of Maxicorp Ltd
Tanja El Sanadidy, Indigo on behalf of Shepherd Enterprises Limited
Maria Walker
Stephen Rankin
Sally Arnold, Planning Potential Ltd on behalf of Power Leisure Bookmakers
Ross Anthony, The Theatres Trust
Mel Barlow-Graham, London Fire and Emergency Planning Authority
Bethany Evans, NLP Planning on behalf of The Harrodian School
Krystyna Kujawska
Steve Simms, SSA Planning Limited on behalf of Kentucky Fried Chicken (Great Britain) Limited
Michelle Hatton-Smith
Spelthorne Borough Council
Helen Harris, Cushman and Wakefield on behalf of Royal Mail Group Ltd
James Sheppard, CBRE on behalf of LGC Ltd
Strategic Planning Team, Royal Borough of Kingston
Emily Vyse, Brooke Smith Planning on behalf of Ancient Order of Forester's Friendly Society Ltd
Christian Leigh on behalf of Jane Miller
Jamie Wallace, CgMs on behalf of Notting Hill Home Ownership
Caroline Wilberforce, Indigo Planning on behalf of on behalf of Sharpe Refinery Service
Teresa Gonet, Highways Agency
Paul Luton
Eliza Shaw
Anthony Paish
Lesley Forster
John Finnerty

Name / Organisation
Dinesh Vitharanage
Cllr Liz Jaeger
Fabio Galvano
Caroline Britton
Peter Britton
Kathleen Massey
Jane Morrison
Ray Morrison
Laura Stritch, Transport for London
Jane Bond
Savills on behalf of Thames Water
Martin Kirrage
Anna Smith
David Yates
Geoff Bond, Chair Martingales Close Residents' Association
Dale and Juliet Nolan
Andrew & Bryony Barnard
Gilda Rogner
Tess Pinto, 20th Century Society
Peter Dowling, Indigo Planning on behalf of Sainsbury's Supermarkets Ltd
Charlotte Gibb, St Mary's University
Peter Willan, Chair for The Friends of Richmond Green
Marie Claire Marsh, NLP Planning on behalf of RFU
Paul Velluet
Tor Barrett, NLP Planning on behalf of the West London Mental Health NHS Trust
Joanne Merritt
David Deaton
Mark Jopling, The Teddington Society and the Friends of Udney Park Playing Fields

**Table 1:** All respondents to the consultation

## 2. Summary of main issues raised during the Pre-Publication consultation

<b>MAIN ISSUES RAISED</b>
<b>Introduction, Strategic Context, Vision and Objectives, Spatial Strategy</b>
<ul style="list-style-type: none"> <li>• Need to take account of the important role of the voluntary and community sector</li> <li>• Refer to Village Plans in introductory section</li> <li>• Need for up to date evidence and for research such as SHMA findings to inform policies</li> <li>• Strategic Vision places insufficient weight on the importance of promoting previously developed brownfield sites for housing</li> <li>• Borough-wide MOL boundary review needed</li> <li>• No blanket approach to protecting industrial land and business parks</li> <li>• Disagree with protecting employment land, especially industrial estates and business parks in existing residential areas</li> <li>• Object to 'restrictive' approach towards transfer of industrial land to other uses</li> <li>• More emphasis on cycling, cycling infrastructure, safe routes and improving public transport</li> <li>• Car parking is not essential to vitality of town centres</li> <li>• Use of term 'villages' throughout the Plan</li> <li>• Need for emergency and disaster planning</li> <li>• More emphasis on social infrastructure needs for the elderly</li> <li>• Need to address shortfall for conventional sheltered housing</li> <li>• Explore opportunities to deliver homes along transport corridors and transport nodes</li> <li>• Need to address Habitats Regulations Assessment</li> <li>• Value of green infrastructure for wildlife and public amenity, lack of reference to 'dark corridors'</li> <li>• Strengthen historic environment, setting of heritage assets and heritage value</li> </ul>
<b>Local Character and Design</b>
<ul style="list-style-type: none"> <li>• Historic England recommendations to improve wording and clarity, such as adding 'heritage assets', and stronger emphasis on heritage sites and conservation areas with appropriate buffer zones around each</li> <li>• Remove any references to 'enabling development', which inherently is a contradiction in a Plan</li> <li>• Need for clarification on densities and application of London Plan Density Matrix</li> <li>• Need for positive response to developments that may be taller than their surroundings where they are in locations of good PTAL</li> <li>• 'Resisting' buildings that are taller than surrounding areas is too strong; require urban design analysis and application of other criteria in policy</li> <li>• Need to acknowledge that there are areas in the borough where tall or 'taller' buildings may be appropriate; need for more flexibility for locations of taller and tall buildings</li> <li>• Need to strengthen policy to say that areas such as Strawberry Hill are 'not appropriate' for taller buildings, rather than identifying them as 'generally inappropriate'</li> <li>• Strengthen reference to deliberate neglect or damage of heritage assets</li> <li>• Need to acknowledge that some selective/partial demolition of BTMs may in some cases be beneficial</li> <li>• Policies to focus on 'conservation' rather than 'protection' and need to weigh up scale of harm or loss and significance of non-designated heritage asset.</li> <li>• Views and vistas policy should only relate to those identified on the Proposals Map</li> <li>• Include references to Crown Estate's The Old Deer Park Richmond - Landscape Strategy, 1999</li> <li>• Reconsider minimum distance between windows within the Amenity and Living Conditions policy – mixed views on whether this should be more flexible or strengthened</li> <li>• Separate policy for balconies</li> </ul>

<b>MAIN ISSUES RAISED</b>
<ul style="list-style-type: none"> <li>• Need to recognise that not all land requires remediation work</li> </ul>
<ul style="list-style-type: none"> <li>• Need to address construction impacts and air, noise and light pollution constraints</li> </ul>
<ul style="list-style-type: none"> <li>• Need to strengthen basement policy: require structural impact assessments for adjacent buildings, take account of ground conditions and underground watercourses/future water flows, require insurance policies to cover any damages, require evidence of engagement with neighbouring properties</li> </ul>
<ul style="list-style-type: none"> <li>• Presumption against any retrofitted basements (Barnes)</li> </ul>
<ul style="list-style-type: none"> <li>• Basement policy should only apply to existing buildings where basements are being added</li> </ul>
<ul style="list-style-type: none"> <li>• Clarify that restricted uses include self-contained units and bedrooms</li> </ul>
<b>Green Infrastructure</b>
<ul style="list-style-type: none"> <li>• Application for designation of Udney Park Playing fields as ‘Local Green Space’; would also require new policy wording that applies to ‘Local Green Space’</li> </ul>
<ul style="list-style-type: none"> <li>• Need to take account of recreation pressure on existing green infrastructure, such as SSSI (Richmond Park; Bushy and Home Park), and that new residential development is likely to exacerbate this pressures</li> </ul>
<ul style="list-style-type: none"> <li>• Need to refer to historic dimension of Richmond’s exceptional landscape heritage</li> </ul>
<ul style="list-style-type: none"> <li>• Need better links with cycling and cycling infrastructure</li> </ul>
<ul style="list-style-type: none"> <li>• Differing views on strength of MOL policy, from a request that the policy should state the Council will not seek to develop land in MOL for schools; to include reference to educational uses for supporting the redistribution of open space in comprehensive development scheme; Mayor of London advises to be cautious with regard to potential comprehensive redevelopment where MOL/Green Belt still performs their functions</li> </ul>
<ul style="list-style-type: none"> <li>• Need to review MOL boundaries as part of Local Plan, specifically in relation to St Paul’s Schools and Lady Eleanor Holles School</li> </ul>
<ul style="list-style-type: none"> <li>• Mayor of London would not support allocation of open spaces for educational uses, including MOL/Green Belt for development of schools</li> </ul>
<ul style="list-style-type: none"> <li>• Need to clarify reference to Green Belt Act 1938</li> </ul>
<ul style="list-style-type: none"> <li>• Proposed OOLTI at St Michael’s Convent does not meet criteria set out in policy</li> </ul>
<ul style="list-style-type: none"> <li>• All criteria should be met for OOLTI designation as otherwise it undermines their value</li> </ul>
<ul style="list-style-type: none"> <li>• Strengthen requirements for all development to deliver net gain for biodiversity, through incorporation of ecological enhancements, wherever possible</li> </ul>
<ul style="list-style-type: none"> <li>• More emphasis on ancient woodland and veteran trees and recognise their historical, cultural and wildlife roles</li> </ul>
<ul style="list-style-type: none"> <li>• Use of standards to justify provision of new small woodland in large-scale developments</li> </ul>
<ul style="list-style-type: none"> <li>• Encourage fruit trees</li> </ul>
<ul style="list-style-type: none"> <li>• Tree policy requires more flexibility, e.g. where works are required to existing trees and that in some developments removal of trees may deliver significantly greater planning benefits</li> </ul>
<ul style="list-style-type: none"> <li>• Green walls are not always suitable and other sustainable design methods can also be used</li> </ul>
<ul style="list-style-type: none"> <li>• Object to removal of separate River Crane corridor policy and Lower Crane Area of Opportunity; need to continue operation of SPG and the related policy; add further sites such as Greggs, RFU, Mereway Day Centre</li> </ul>
<ul style="list-style-type: none"> <li>• Expand river corridor policy to include river restoration for the Lower Crane, reflect importance of Lower Duke of Northumberland’s River corridor</li> </ul>
<ul style="list-style-type: none"> <li>• Differing views on access to rivers: site specific characteristics may prevent achieving public access; for healthy and safety reasons it may not be appropriate and access is not always feasible on all sites; to requiring access in all development sites along the river</li> </ul>
<ul style="list-style-type: none"> <li>• Include reference to viability when resisting redevelopment of existing river-dependent or river-related industrial and business uses to non-river related employment</li> </ul>
<ul style="list-style-type: none"> <li>• Require development proposals in close proximity to the river to utilise the river for the transport of construction materials and waste where practicable</li> </ul>
<ul style="list-style-type: none"> <li>• Need for definitions for houseboats, residential moorings, temporary and permanent moorings</li> </ul>
<ul style="list-style-type: none"> <li>• Given number of houseboats in the borough, it is questioned whether by definition they are inappropriate uses within MOL</li> </ul>
<ul style="list-style-type: none"> <li>• Remove ‘wider benefit to the community’ criterion within moorings and floating structures policy</li> </ul>
<b>Climate Change and Sustainable Design</b>
<ul style="list-style-type: none"> <li>• SuDS should be a requirement (rather than encouraged) in all new development</li> </ul>

<b>MAIN ISSUES RAISED</b>
<ul style="list-style-type: none"> <li>• Acknowledge difference between brownfield and greenfield sites and amend SuDS policy requirements in line with National SuDS standards</li> </ul>
<ul style="list-style-type: none"> <li>• Require installation of pumped device in all new basements where required</li> </ul>
<ul style="list-style-type: none"> <li>• Need definition for 'floodplain compensation'</li> </ul>
<ul style="list-style-type: none"> <li>• Include emphasis on the use of recycled or secondary aggregates and the efficient use of building materials in new development</li> </ul>
<ul style="list-style-type: none"> <li>• Approach to zero carbon standards is supported but only where technically feasible.</li> </ul>
<ul style="list-style-type: none"> <li>• In relation to the requirement for 35% CO2 emission reductions, add 'unless there is robust evidence to demonstrate that this is not feasible and/or viable'</li> </ul>
<ul style="list-style-type: none"> <li>• The threshold for meeting BREEAM Excellent should be raised from 100sqm to 1,000sqm</li> </ul>
<ul style="list-style-type: none"> <li>• Explicitly refer to improving air quality by reducing emissions from transport</li> </ul>
<ul style="list-style-type: none"> <li>• More emphasis on the importance of water conservation and the efficient use of water</li> </ul>
<b>Town Centres</b>
<ul style="list-style-type: none"> <li>• Evidence and research disputed that further shopping/shops are needed</li> </ul>
<ul style="list-style-type: none"> <li>• Hampton Wick is a primarily residential area and should not be defined as a neighbourhood centre. Designation of key office area in Hampton Wick is not consistent with designation as neighbourhood centre.</li> </ul>
<ul style="list-style-type: none"> <li>• Support for restricting further A3, A4 or A5 uses. Concern that retail projections could result in an increase in such uses which would have a detrimental effect on residential amenity.</li> </ul>
<ul style="list-style-type: none"> <li>• Town centre policies should include more emphasis on accessibility and transport, including deliveries to town centre</li> </ul>
<ul style="list-style-type: none"> <li>• List of appropriate uses in town centres should reflect that in NPPF</li> </ul>
<ul style="list-style-type: none"> <li>• Support for approach for main town centres. However, policy does not explicitly support housing in town centres</li> </ul>
<ul style="list-style-type: none"> <li>• Support for over-concentration policy, but Article 4 Direction should be considered to restrict further A3 uses</li> </ul>
<ul style="list-style-type: none"> <li>• More flexibility in relation to length of marketing for vacant premises to prevent negative visual impact of long-term vacancies</li> </ul>
<ul style="list-style-type: none"> <li>• Policy is too restrictive towards betting shops (Sui Generis uses) and does not foster competition in line with NPPF</li> </ul>
<b>Community Facilities</b>
<ul style="list-style-type: none"> <li>• More reference required to the social value of voluntary and community sector services</li> </ul>
<ul style="list-style-type: none"> <li>• Multi-use of premises for community usage is supported but often restricted due to availability and cost</li> </ul>
<ul style="list-style-type: none"> <li>• Fire stations should not be listed as community infrastructure.</li> </ul>
<ul style="list-style-type: none"> <li>• Suitability of redundant social infrastructure premises for other forms of social infrastructure for which there is a defined need in the locality should be assessed before alternative developments are considered</li> </ul>
<ul style="list-style-type: none"> <li>• Indoor and outdoor sports facilities should be specifically mentioned within the policy</li> </ul>
<ul style="list-style-type: none"> <li>• Not supportive of education proposals at Stag Brewery and Barnes Hospital due to accessibility difficulties to both sites</li> </ul>
<ul style="list-style-type: none"> <li>• Kneller Hall could play a role in meeting the borough's education needs</li> </ul>
<ul style="list-style-type: none"> <li>• Specific references needed where areas are deficient in primary health care facilities e.g. Ham</li> </ul>
<ul style="list-style-type: none"> <li>• General support for restricting takeaways in proximity to schools but one respondent objects because no reasoned justification has been provided</li> </ul>
<ul style="list-style-type: none"> <li>• Need for pharmacy services</li> </ul>
<ul style="list-style-type: none"> <li>• Need to expand Council's Community Toilet Scheme (e.g. in Barnes)</li> </ul>
<ul style="list-style-type: none"> <li>• Need to recognise that provision of on-site public open space is not always feasible</li> </ul>
<ul style="list-style-type: none"> <li>• Requirement for publicly accessible play space should be considered on a case by case basis</li> </ul>
<ul style="list-style-type: none"> <li>• Priority should be given to walking and cycling in accessing open spaces, and access distances/standards should be along pedestrian routes rather than as the crow flies</li> </ul>
<ul style="list-style-type: none"> <li>• Remove reference to allotments becoming surplus to requirements as this is inconsistent with the evidence of long waiting lists indicating unmet demand for allotment spaces</li> </ul>
<ul style="list-style-type: none"> <li>• Need to prioritise addressing poor broadband speeds and mobile phone reception</li> </ul>

<b>MAIN ISSUES RAISED</b>
<b>Housing</b>
<ul style="list-style-type: none"> <li>Local Plan housing target does not reflect findings of the SHMA – need to explore all options to fully meet the need, including duty to cooperate with neighbouring boroughs</li> <li>Address impact of extensions by seeking greater proportion of smaller dwellings, which may overall increase delivery</li> <li>Need to allocate suitable sites for residential to ensure delivery; it is essential to allocate previously developed industrial site rather than relying on PD office to residential conversions</li> <li>Acknowledge there will be windfall sites, and that not all present/future needs will be met through allocated sites</li> <li>Concern at the expectation to exceed London Plan housing target in light of its Review</li> <li>Clarify the breakdown of new housing units for individual wards/areas</li> <li>Royal Mail has no plans to relocate operations from existing delivery offices in the future; likely to seek expansion of assets or require new sites, particularly in locations with housing growth</li> <li>Need to prepare for increased housing requirements expected in review of London Plan and expectation for outer London Boroughs to meet much of this additional need</li> <li>LGC Ltd site (Teddington) should be allocated for mixed-use (allowing for retention of employment with potential for substantial housing delivery on a brownfield site)</li> <li>Mayor of London: need to find additional housing capacity in order to be in conformity with the London Plan; need to seek to further close the gap between local supply and need. Minimum supply targets should be supplemented with additional capacity in town centres, surplus industrial, commercial and public land and other large sites, especially in good PTAL areas</li> <li>Borough will have to satisfy itself it can demonstrate it has looked at all options for housing delivery in order to meet demand and to protect other designated land</li> <li>Kneller Hall could play a role in meeting identified housing needs, particularly as a brownfield site in a sustainable location with a large area of land outside the MOL policy designation</li> <li>Insufficient evidence to justify the affordable housing requirement set out in LP36 and further viability assessments are required to justify the targets</li> <li>Question whether identified housing sites will come forward, particularly following Brexit</li> <li>Private amenity space allocations and minimum ceiling height are too prescriptive and there should be greater flexibility</li> <li>Affordable housing policy should be amended and small site contributions should not be sought; Ministerial Statement and NPPG should be followed</li> <li>Remove 'gross' criterion in relation to contributions from small sites; oppose requirement for 1 or 2 units; reconsider threshold and potentially increase to 5 units</li> <li>Need to include a policy on Starter Homes</li> <li>Need to plan for strategic and local accommodation needs for students</li> <li>Requirement for viability assessments and their appraisal by the Council to be published</li> <li>Principle of 'claw-back' is unclear and uncertainty for developers</li> <li>Clarify whether the tenure mix is to be applied to the total number of affordable units or to the total of all housing units</li> <li>Delete reference to EUV as it does not accord with NPPF/PPG, and does not have regard to the market or allow for competitive returns</li> <li>Need for elderly accommodation should be emphasised within policy and reflect the SHMA</li> <li>Concerns about large summerhouse creep in back gardens</li> <li>Consider a less stringent approach to infill and backland development, especially outside of Conservation Areas, to increase housing supply</li> <li>Reflect whether standards such as minimum thresholds for gardens and 20m distance between windows are applicable across the whole borough – more flexibility could support additional housing delivery</li> </ul>
<b>Employment and Local Economy</b>
<ul style="list-style-type: none"> <li>Need to identify target for quantum of employment floorspace in line with increased demand for office floorspace, based on updated evidence base (e.g. updated Employment Land Study)</li> <li>Industrial sites often have adverse impacts on residential amenity; encourage redevelopment of industrial sites for mixed use, which would contribute to housing supply</li> <li>Policies should consider job creation, not just employment floorspace, e.g. replacement of industrial floorspace with office floorspace</li> <li>Policies should not seek to retain all employment sites if there is no prospect of their continued use, or where retention of all employment floorspace is unlikely to be viable</li> <li>Policies should address the affordability and availability of office space for the voluntary sector</li> </ul>

<b>MAIN ISSUES RAISED</b>
<ul style="list-style-type: none"> <li>• Object to designation of Lower Teddington Road as a Key Office Area because the area is mixed-use rather than predominantly office</li> </ul>
<ul style="list-style-type: none"> <li>• The following 'local important industrial land and business park', should be designated as a Key Office Area instead, or be allocated for mixed use development: St Margaret's Business Park, Greggs bakery, Arlington Works (adjacent to Twickenham Film Studios), St Clare Business Park (for mixed-use), Sandycombe Centre (for mixed-use only)</li> </ul>
<ul style="list-style-type: none"> <li>• Marketing evidence should be for a period of 6 months to 1 year, rather than 2 years</li> </ul>
<ul style="list-style-type: none"> <li>• No Industrial Land and Business Parks have been identified in Mortlake / East Sheen, where rents are very high in this area, making it difficult for service industry occupiers to locate here</li> </ul>
<ul style="list-style-type: none"> <li>• Provision of replacement industrial floorspace on industrial sites is unrealistic; the policy should not focus on matching floorspace because higher job numbers could be achieved with office or mixed-use development on a smaller footprint</li> </ul>
<ul style="list-style-type: none"> <li>• Sequential approach within employment policy should include mixed-use and residential uses</li> </ul>
<ul style="list-style-type: none"> <li>• Support for growth in hotels to be in step with transport availability</li> </ul>
<ul style="list-style-type: none"> <li>• Need to refer to numbers of hotel bedrooms needed over plan period, and updated visitor Economy Study</li> </ul>
<b>Transport</b>
<ul style="list-style-type: none"> <li>• Cycling and walking need to be embedded as a means of transport for all areas of the borough; need to encourage people to travel by means other than the car</li> </ul>
<ul style="list-style-type: none"> <li>• Car parking in town centres is not essential to their vitality; 30 min free parking puts emphasis on car travel rather than other ways to access town centres</li> </ul>
<ul style="list-style-type: none"> <li>• Need to design streets to reduce traffic speeds and improve pedestrian environments</li> </ul>
<ul style="list-style-type: none"> <li>• Need to safeguard land for walking and cycling networks and identify proposals as well as investment to deliver improvements</li> </ul>
<ul style="list-style-type: none"> <li>• Include reference to not permitting gated developments</li> </ul>
<ul style="list-style-type: none"> <li>• Need to consider Crossrail 2 in Plan, including the four stations that it is proposed to serve; and support Crossrail 2 in principle; consider pro-active approach to optimising development capacity within the vicinity of Crossrail 2 stations</li> </ul>
<ul style="list-style-type: none"> <li>• Include reference to supporting new river infrastructure, including piers and landing stages</li> </ul>
<ul style="list-style-type: none"> <li>• Need for public transport improvements and encouraging effective river transportation, including for commuters</li> </ul>
<ul style="list-style-type: none"> <li>• Need to refer to taxis and ensure they are adequately catered for in appropriate locations</li> </ul>
<ul style="list-style-type: none"> <li>• Transport links should only be improved for active travel and public transport (not cars)</li> </ul>
<ul style="list-style-type: none"> <li>• Travel Plans should include requirement to monitor actual travel modes and explain why they have failed</li> </ul>
<ul style="list-style-type: none"> <li>• Link with walking and cycling to Government's Childhood Obesity strategy, and the need to provide safe routes for children</li> </ul>
<ul style="list-style-type: none"> <li>• Need to consider preventing side extensions on shared driveways that could block a neighbour's access to off-street parking</li> </ul>
<ul style="list-style-type: none"> <li>• Need to actively encourage the use of pooling, sharing, scheduling and other methods to minimise the impact of deliveries on town centres</li> </ul>
<ul style="list-style-type: none"> <li>• Require hard standing for parking to be kept to minimum necessary and require SuDS for parking surfaces</li> </ul>
<ul style="list-style-type: none"> <li>• London Plan allows more flexible approach in Outer London, but account needs to be taken of air quality, impact of on-street parking measures such as CPZs, car clubs etc.</li> </ul>
<ul style="list-style-type: none"> <li>• Some areas in PTAL 3 or 4 may also be suitable for car free or low parking provision; remove reference to PTALs 5 and 6 to conform with London Plan policy</li> </ul>
<ul style="list-style-type: none"> <li>• Remove reference that car clubs do not remove need for parking</li> </ul>
<ul style="list-style-type: none"> <li>• Cycle parking should be reflective of London Plan standards and developers should make contributions towards cycling infrastructure</li> </ul>
<ul style="list-style-type: none"> <li>• Front garden parking should always be resisted/forbidden</li> </ul>
<ul style="list-style-type: none"> <li>• Acknowledge that adding off-street parking reduces overall number of parking spaces available</li> </ul>
<ul style="list-style-type: none"> <li>• Charge householders with off-street parking an annual fee commensurate with Residents' Parking Charge in a CPZ; increase fees for second cars in households</li> </ul>
<ul style="list-style-type: none"> <li>• Parking standard should refer specifically to cycling parking and charging points</li> </ul>
<ul style="list-style-type: none"> <li>• Include a map showing the different PTALs in the borough</li> </ul>
<ul style="list-style-type: none"> <li>• Existing parking standards are stringent, lead to provision of more parking than likely to be required, and no flexibility is provided to take account of site specific characteristics; flexibility should be allowed to take into account site specific circumstances and opportunities to reduce car ownership</li> </ul>

<b>MAIN ISSUES RAISED</b>
<b>Site Allocations</b>
<ul style="list-style-type: none"> <li>Historic England: need to include references to relevant Conservation Areas, Conservation Area Appraisals/Statements, Listed Buildings and other heritage assets on or adjoining sites and remove references to 'enabling development'</li> </ul>
<ul style="list-style-type: none"> <li>Stronger emphasis on protecting open spaces and MOL designations on sites</li> </ul>
<ul style="list-style-type: none"> <li>Bespoke and tailored comments for proposed site allocations from the Environment Agency and Thames Water</li> </ul>
<ul style="list-style-type: none"> <li>Thames Water unable to make detailed assessment on wastewater infrastructure without indication of location, type and scale of development: Hampton Square and St Michael's Convent</li> </ul>
<ul style="list-style-type: none"> <li>Thames Water concerned regarding wastewater infrastructure capacity in this area; upgrades to the existing infrastructure are likely to be required: Platts Eyot, Hampton Traffic Unit, Hampton Delivery Office, Twickenham Stadium, Ham Close, Cassel Hospital, Stag Brewery, Barnes Hospital</li> </ul>
<ul style="list-style-type: none"> <li>Platts Eyot: need to include reference to the need for vehicular access to the island as part of any development proposals; omit reference to Platts Eyot Conservation Area</li> </ul>
<ul style="list-style-type: none"> <li>Strathmore Centre: need to maintain child-care provision on site/in area, maintain outside space for children's use, need for adequate onsite parking</li> </ul>
<ul style="list-style-type: none"> <li>St Mary's University: need to amend boundary; highly sensitive site in relation to heritage assets; residents concerned about importance of openness of views across much of the site and its link as part of a green corridor</li> </ul>
<ul style="list-style-type: none"> <li>Twickenham Stadium, The Stoop, Richmond College: need to work closely with TfL re A316; need to refer to Duke of Northumberland River and environmental improvements</li> </ul>
<ul style="list-style-type: none"> <li>Twickenham Stadium: need to amend policy to make it more positive and flexible; it needs to evolve and enhance the facilities for visitors and retain its status as the national stadium; need to remove MOL designation from the site</li> </ul>
<ul style="list-style-type: none"> <li>Ham Close: designate Ham Village Green as Public Open Space and OOLTI; any redevelopment should respond to the distinctive character of Ham rather than just the existing Ham Close which is not typical of Ham; refer to forthcoming Neighbourhood Plan; refer to servicing, car and cycle parking; improve wording to show how the development can respond to local character and history; the site presents opportunities to enhance the quality of the local townscape and create a more cohesive sense of place</li> </ul>
<ul style="list-style-type: none"> <li>Cassel Hospital: ensure OSNI/OOLTI is correctly referred to as the grounds to the rear and to the side; object to designation of social/community infrastructure use as the most appropriate use for the site; residential use is a pre-requisite for a viable development; add reference to viability; remove reference to enabling development</li> </ul>
<ul style="list-style-type: none"> <li>St Michael's Convent: very strong support for a large number of residents/local groups for designation as OOLTI (and also OSNI); omit reference to enabling development; site is not an existing community use / there is no public access; there is no evidence to support demand for social infrastructure/community use; strong need for residential, which is only land use that can support long term viability for listed buildings; convent has been sold and text needs to be updated</li> </ul>
<ul style="list-style-type: none"> <li>Richmond Station: more flexibility is needed to take account of the site's circumstances and viability; old site brief (2002) – site still has not come forward, which demonstrates complexity; need to reflect viability and development costs; flexibility is also needed in relation to building heights – buildings taller than 6 storeys/18 metres should be allowed where there are exceptional circumstances and where it can be robustly justified in design and heritage terms</li> <li>different views on whether Richmond station building should be comprehensively redeveloped, or whether it should be retained/restored</li> <li>one objection to site allocation as there should be no development across and above some or all of the existing tracks and platforms</li> </ul>
<ul style="list-style-type: none"> <li>Friars Lane: need to ensure loss of parking facilities does not impact negatively on parking facilities around Richmond Green</li> </ul>
<ul style="list-style-type: none"> <li>Sainsbury's, Lower Richmond Road: need to consider viability and flexibility, especially as redevelopment would necessitate period of closure and thus loss of trading; take account of Gas Distribution pipeline</li> </ul>
<ul style="list-style-type: none"> <li>Pools on the Park: development potential should be explored with Historic England; Listed status of Pools building does not preclude alterations, but significance of building needs to be understood first; justification for complete demolition and rebuilding has not been made at this juncture; some respondents felt the listed complex needs to be preserved; include 'Old Deer Park' in title; need to refer to 'The Crown Estate's The Old Deer Park Richmond - Landscape Strategy, 1999'</li> </ul>
<ul style="list-style-type: none"> <li>Richmond Rugby and Richmond Athletic Ground: strengthen preservation of listed complex; amend title to 'The Richmond Athletic Association Ground, Old Deer Park, Richmond'</li> </ul>
<ul style="list-style-type: none"> <li>Stag Brewery: new secondary school should be 'sought' and not 'required'; need to recognise that infrastructure priorities (such as school) will affect viability; remove reference to retaining playing field and change to re-providing; need for flexibility in relation to employment uses and lower cost units;</li> <li>include requirement to retain BTMs; no justification has been provided for new secondary school and no public consultation was undertaken following the site brief; consider alternative locations in the area, including Barn Elms (although this is designated MOL); need to re-do planning brief, taking account of change in school provision, transport impacts</li> </ul>

<b>MAIN ISSUES RAISED</b>
number of housing units
<ul style="list-style-type: none"> <li>• Mortlake and Barnes Delivery Office: need for affordable units as part of employment uses</li> <li>• Kew Biothane Plan: consider community uses as part of the redevelopment of this site (e.g. community centre); object to statement that development in MOL will be inappropriate;</li> <li>• Barnes Hospital: possibility of locating primary and /or community health services on this site should be further investigated; need for Masterplan / guidance in Village Plan SPD</li> <li>• Concerns about primary school; instead, site and hospital should be used for social housing</li> </ul>
<b>New site allocations / omissions</b>
<ul style="list-style-type: none"> <li>• Greggs: need for mixed use allocation; safeguarding as existing industrial and office accommodation will mean that it is unlikely any purpose built accommodation, e.g. for affordable workspace, start-ups and space small local businesses, will come forward without the introduction of residential uses that cross-subsidise workspace</li> <li>• LGC Ltd, Teddington: need for allocation of mixed use (employment/residential), allowing for enabling development to support the business; LGC Ltd can only continue to operate in this borough if enabling residential development can cross-subsidise new fit-for-purpose facility; boundary change required;</li> <li>• St Clare Business Park: no identification as locally important industrial land and business park; allocate for mixed uses, comprising employment floorspace (B1) and residential uses</li> <li>• Kneller Hall: allocate for mixed use development; site is suitable for a range of alternative uses (subject to needs and demands), including public/community or social infrastructure, employment, hotel or leisure uses, and residential; need for Masterplan to be prepared in partnership with the LPA, stakeholders and the community to determine the appropriate mix, scale and form of the development.</li> <li>• Former Imperial College, Udney Park Road, Teddington: allocate for maximum of 2 ha Class C2 extra care accommodation and community and health facilities as well as at least 3.2 ha of publicly accessible open space for sport and recreation</li> <li>• Removal of H1 allocation from the UDP is not justified and not supported; Karslake and Ruston Ward Buildings should be allocated for residential use; remainder of current H1 allocation should be carried over in Local Plan, and allocated for business, residential and other compatible uses together with re-use of the associated filter beds and surrounding land</li> <li>• Land to West of Stain Hill West Reservoir, Hampton Water Treatment Works, Upper Sunbury Road should be allocated for residential development.</li> <li>• Hydes Field, Land to North of Hampton Water Treatment Works, Upper Sunbury Road should be allocated for residential development.</li> <li>• Need to address existing anomalies in relation to Old Deer Park boundaries for MOL, Public Open Space and the Richmond Town Centre</li> <li>• Mortlake Station should be allocated to address visual appearance of the timber yard and lorry traffic next to crowded level crossing</li> </ul>

**Table 2:** Summary of main issues raised during the Pre-Publication consultation

### 3. Summaries of responses received in relation to the strategic vision, objectives and spatial strategy and Council's response

Ref No.	Name / Organisation	Summary of response received	Council's response
1	Richard Geary	Draft Local Plan does not bear any relation to reality	Noted
2	Judith Livesey, NLP Planning on behalf of St Paul's School	Object to protecting existing areas of MOL in the absence of MOL boundary review; urgent need for staff accommodation on site	<ul style="list-style-type: none"> <li>• See response to comment 145 below</li> </ul>
3	Myrna Jelman	The Council should be more innovative and ambitious in solving public transport issues. As a resident dealing on almost a weekly basis with RHP (Richmond Housing Partnership) for example, I feel very little accountability in that organisation which is allowed to fail to deliver results for years, unchecked.	<ul style="list-style-type: none"> <li>• The Council is not the provider of public transport, however, it should be noted that policies in the Plan, including in particular Policy LP 44 Sustainable Travel Choices, ensure that major new developments maximise opportunities to provide safe and convenient access to public transport services, and the Council will work in partnership with providers such as Transport for London to achieve improvements.</li> <li>• Accountability to the public is not a matter for the Local Plan. Richmond Housing Partnership (RHP) is an approved housing association that provide, amongst many other registered providers/social landlords, social housing on behalf of the Council. Registered providers, such as RHP, share the Richmond Housing Register and must be approved by the Homes and Communities Agency.</li> </ul>
4	Helene Jelman	The Council should be more innovative and ambitious in solving public transport issues. As a resident dealing on almost a weekly basis with RHP (Richmond Housing Partnership) for example, I feel very little accountability in that organisation which is allowed to fail to deliver results for years, unchecked.	<ul style="list-style-type: none"> <li>• The Council is not the provider of public transport, however, it should be noted that policies in the Plan, including in particular Policy LP 44 Sustainable Travel Choices, ensure that major new developments maximise opportunities to provide safe and convenient access to public transport services, and the Council will work in partnership with providers such as Transport for London to achieve improvements.</li> <li>• Accountability to the public is not a matter for the Local Plan. Richmond Housing Partnership (RHP) is an approved housing association that provide, amongst many other registered providers/social landlords, social housing on behalf of the Council. Registered providers, such as RHP, share the Richmond Housing Register and must be approved by the Homes and Communities Agency.</li> </ul>
5	Rachel Botcherby, Planning Advisor, London and South East National Trust	Support for vision, objectives and spatial strategy	Noted
6	William Mortimer	Absence of an approach to emergency and disaster management, including Thames Barrier; need to link this with telecommunications and transport systems	<ul style="list-style-type: none"> <li>• Comments and concerns in relation to emergency and disaster management are noted. One of the duties imposed upon Local Authorities under the Civil Contingencies Act (2004) is to assess the risk of an emergency occurring within or affecting their geographical area. This duty is discharged at the Local Resilience Forum (LRF) level and is a collaborative evaluation of risk used to inform emergency planning, business continuity and warning and informing the public.</li> <li>• The Council has a lot of information published on its public website in relation to accidents and emergencies: <a href="http://www.richmond.gov.uk/accidents_emergencies_and_safety.htm">www.richmond.gov.uk/accidents_emergencies_and_safety.htm</a></li> </ul>

Ref No.	Name / Organisation	Summary of response received	Council's response
			<ul style="list-style-type: none"> <li>The Council has specific advice, guidance and plans in place to deal with emergencies, such as flooding. There is also advice and guidance on how to prepare for an emergency, what to do if you are involved in an emergency, how to get information, coping emotionally and general evacuation advice.</li> <li>If you would like to discuss this further, please contact the Council's Emergency Planning Officer at: <a href="mailto:emergency.planning@richmond.gov.uk">emergency.planning@richmond.gov.uk</a></li> </ul>
7	Wendy Crammond, Co-Chair Kew Residents Association	Add (6th) point at 2.1.4:"People have a right to expect a clean environment which will not compromise their health".	<ul style="list-style-type: none"> <li>The paragraph in 2.1.4 sets out the overall vision for the borough's Community Plan. As this is an approved and adopted document, the Local Plan cannot amend the Community Plan. However, this will be fed back to the relevant department within the Council who is responsible for the Community Plan.</li> </ul>
8	Ben Mackworth-Praed, on behalf of the Barnes Community Association	Define Smart City Technology	<ul style="list-style-type: none"> <li>Agreed. A definition for 'smart city' has been incorporated into the Glossary.</li> </ul>
9	Kevin Goodwin, RPS CgMs for Goldcrest Land	Richmond does not contain any 'villages'. Employment land should not be protected if 'the location is no longer compatible with the provision of employment space, there is no demand or it is not financially viable to provide any'. Higher density and larger developments also in 'other locations with good and high levels of accessibility'.	<ul style="list-style-type: none"> <li>The Council has decided to use the term 'villages', as defined within the glossary as: "A term applied to define the distinct and local areas in this borough as determined by local communities."</li> <li>See response to comment 304 below in relation to the protection of employment land and the Council's approach in this regard.</li> <li>See response to comment 89 below in relation to higher densities outside of main centres.</li> </ul>
10	Sarah Stevens, Turleys for British Land	Support for vision, objectives and spatial strategy	Noted.
11	Tim Lennon, Borough Coordinator Richmond Cycling Campaign	Cycling has a more important role to play in the borough; the Plan should reflect aspirations and cycling should be taken more seriously as a mode of transport	<ul style="list-style-type: none"> <li>The Council considers that cycling is sufficiently covered in the Local Plan. It is part of the strategic vision, part of the strategic objectives as well as the spatial strategy. There are also references to cycling within the Green Infrastructure, Social and Community Infrastructure and Public Open Space, Play Space, Sport and Recreation policies, and importantly within the Health and Wellbeing policy. Emphasis on cycling is covered in detail in Policy LP44 Sustainable Travel Choices (specifically paras 11.1.4-11.1.9) and cycle parking standards are covered within Policy LP45. The implementation section of the Plan clearly states that improvements to transport infrastructure, particularly to public transport as well as cycling and walking, will be essential to the delivery of the spatial strategy, and the Council will work with partners to achieve public transport and other improvements.</li> <li>It should be noted that this is the Local Plan and not the borough's cycling strategy or Local Implementation Plan. For information, the Council is carrying out a public consultation on the borough's Cycling Strategy in the autumn of 2016: <a href="https://consultation.richmond.gov.uk/environment/cycling">https://consultation.richmond.gov.uk/environment/cycling</a></li> </ul>

Ref No.	Name / Organisation	Summary of response received	Council's response
12	Janet Nuttall, Natural England	Support for vision, objectives and spatial strategy. Recommend specific reference to internationally and nationally designated sites within the Borough. Support for policies LP 6 Royal Botanic Gardens, Kew World Heritage Site - LP 9 Floodlighting - LP 10 Local Environmental Impacts, Pollution and Land Contamination - LP 12 Green Infrastructure - LP 13 Green Belt and Metropolitan Open Land - LP 14 Other Open Land of Townscape Importance - LP 15 Biodiversity - LP 16 Trees and Landscape - LP 17 Green Roofs and Walls - LP 18 River corridors - LP 20 Climate Change Adaptation - LP 21 Flood Risk and Sustainable Drainage - LP 22 Sustainable Design and Construction - LP 23 Water Resources and Infrastructure - LP 31 Public Open Space, Play Space, Sport and Recreation - LP 32 Allotments and food growing spaces - LP 44 Sustainable Travel Choices	Noted.
13	Tim Sturgess, Bilfinger GVA on behalf of The Lady Eleanor Holles School	Representations in relation to LP29 (education) and LP13 (MOL) See comment 156 below.	See response to comment 156 below.
14	Sam Hobson, Quantum Group	Support for vision, but need for flexibility in relation to maximising sites' potential whilst protecting character of the borough. Need to contribute meeting needs of wider London and south east. More emphasis on social infrastructure needs of the elderly sector of the borough's population, including identification of sites and meeting shortfall for conventional sheltered housing. Proposal for a new site allocation (Udney Park).	<ul style="list-style-type: none"> <li>Note that in relation to LP37, a reference is added to the Council's Retirement Housing Review (2016). The Council's research on extra care and retirement housing review, alongside the SHMA, have been used to inform a balanced approach to meeting needs for different types of housing, bearing in mind local priorities and the limited land supply. The Council will not allocate Udney Park for extra care accommodation or any other built development. However, the Council will designate the land as Local Green Space. See response to comment 145 above 477 below.</li> </ul>
15	Steve Simms, SSA Planning Limited on behalf of Kentucky Fried Chicken (Great Britain) Limited	Disagree with restricting A5 uses in proximity to schools as a method to tackling childhood obesity; there is no evidence of causal link between proximity and incidence of obesity or overweight pupils. New policy effectively bans new A5 hot food takeaways whereas spatial strategy states 'restricting access.	<ul style="list-style-type: none"> <li>Restricting children's access to fast food takeaways is a well-established way in which the planning system can contribute towards tackling rising childhood obesity and is an approach that has been adopted in many other boroughs. See response to comment 250 below.</li> </ul>
16	Emily Vyse, Brooke Smith Planning on behalf of Ancient Order of Forester's Friendly Society Ltd	Support for a choice of new homes, but disagree with protecting business parks and land for employment use. Where business parks provide non-conforming uses within existing residential areas, they should not be protected. Need to consider sites within their local context and against market signals. Employment space should be within appropriate locations, where industrial uses do not create inappropriate living environment and residential amenity. Issues arise from noise, pollution, congestion	<ul style="list-style-type: none"> <li>The Council's evidence demonstrates that there is a shortage of employment sites in the borough, specifically industrial land. Therefore, remaining industrial land needs to be retained in industrial use to address this shortage and to retain a balanced economy in the borough with a variety of employment options and space for new businesses to develop and existing businesses to grow. Therefore, the redevelopment of industrial sites in the borough to be for mixed use office and residential development is not supported in line with policy LP42.</li> <li>Where industrial sites are located in proximity to residential, it should be noted that</li> </ul>

Ref No.	Name / Organisation	Summary of response received	Council's response
		(e.g. due to larger vehicles). Employment uses on industrial sites could be retained in more appropriate ways e.g. redevelopment for mixed uses, including residential and office space	these have been operating successfully for many years without any significant adverse effects on residents, and it is important that a balance is struck between the different types of land uses.
17	Paul Luton	Need to acknowledge the ill effects of motorised transport. The default means of transport (but not the only) should be cycling or walking, which reduce noise, pollution and contribute to mitigating climate change.	<ul style="list-style-type: none"> <li>The Council considers that cycling is sufficiently covered in the Local Plan, not just as a recreational activity but as a mode of transport. Cycling is part of the strategic vision, part of the strategic objectives as well as the spatial strategy. There are also references to cycling within the Green Infrastructure, Social and Community Infrastructure and Public Open Space, Play Space, Sport and Recreation policies, and importantly within the Health and Wellbeing policy. Emphasis on cycling as a mode of transport is covered in detail in Policy LP44 Sustainable Travel Choices (specifically paras 11.1.4-11.1.9) and cycle parking standards are covered within Policy LP45. It should be noted that this is the Local Plan and not the borough's cycling strategy or Local Implementation Plan. For information, the Council is carrying out a public consultation on the borough's Cycling Strategy in the autumn of 2016: <a href="https://consultation.richmond.gov.uk/environment/cycling">https://consultation.richmond.gov.uk/environment/cycling</a></li> </ul>
18	Jamie Wallace, CgMs on behalf of Notting Hill Home Ownership	<p>A blanket approach to protecting all industrial land and business parks from residential development is too restrictive and does not take account of the individual characteristics and details of individual sites. Need to undertake assessment of quality of existing stock and demand in the locality to establish evidence base, based on individual characteristics.</p> <p>St Clare Business Park contains outdated floorspace with is not fit for the modern market; site could provide for a mix of uses, which can cross fund replacement of new commercial floorspace and delivering new homes. Need to take account of market signals, in line with NPPF. Historic employment sites within the Borough, including the St Clare Business Park, are now outdated, not just in terms of the quality and nature of the accommodation provided, but also in terms of their location and the purposes which they serve. Therefore alternative reuse, on a mixed use basis, is required to provide an appropriate quantum of the right type of employment space in this location and to enable appropriate redevelopment to come forward. An approach which requires all existing employment floorspace to be retained is unlikely to deliver the required redevelopment of the ageing employment buildings, many of which are not fit for modern employment uses, or to regenerate these sites to meet modern occupier demands.</p>	<ul style="list-style-type: none"> <li>The Council has carefully identified existing industrial land and business parks, based on thorough evidence and research, as set out within the Council's borough-wide <a href="#">Assessment of Light Industrial and Storage Stock</a> and <a href="#">Appendices</a>. Therefore, the Council has not adopted a <i>blanket approach</i> to protecting <i>all</i> industrial land and business parks.</li> <li>The Council's existing research is also supplemented by an update of the Employment Land Study. This research is underway to establish a comprehensive, up-to-date and robust evidence base in relation to employment land in the borough. This is to be published alongside the Publication version of the Local Plan.</li> <li>It needs to be acknowledged that the borough has a very limited supply of industrial floorspace and demand for this type of land is high. The London Plan states that a 'restrictive' approach towards the transfer of industrial land to other uses should be adopted in the borough, which means that industrial land should not be released for other uses. Therefore, in order to deliver this key priority and strategic objective, locally important industrial land and business parks, which are of particular importance for warehousing, distribution, storage and other industrial employment as well as locally important creative industries and other key employment facilities, are identified in the Local Plan. Any loss of industrial space within these areas will be strongly resisted. This is to ensure that the borough can continue to provide for local business and employment needs.</li> <li>In addition, the GLA's Industrial Land Supply and Economy Study (2015) demonstrates that the borough has a very limited supply of industrial land, with only 17.3 hectares of general and light industrial space (B2 and B1(c)), and 8.1 hectares of warehousing and storage (B8) facilities; this is amongst the lowest of all the London boroughs. It is expected that the 'restrictive transfer' approach will be retained within the next</li> </ul>

Ref No.	Name / Organisation	Summary of response received	Council's response
			London Plan. Therefore there is a presumption against loss of any industrial or other such employment space in all parts of the borough, and any loss will be particularly strongly resisted in the listed important industrial land and business parks.

**Table 3:** Summaries of comments on Strategic Vision, Strategic Objectives and Spatial Strategy and Council's response

#### 4. Summaries of responses received in relation to the Local Plan policies and site allocations and Council's response

Ref No.	Name / Organisation	Summary of response received	Council's response
		<b>General Comments</b>	
19	Janet Nuttall, Natural England	Local Plan needs to address and should be screened under Habitats Regulations Assessments	<ul style="list-style-type: none"> <li>The Habitats Regulations Assessment is underway and this is to be published alongside the Publication version of the Local Plan.</li> </ul>
20	Michelle Hatton-Smith	Community toilet facilities needed for elderly people; should be part of inclusive and accessible environments. Any changes to public buildings should take regard to the needs of elderly members of the public.	<ul style="list-style-type: none"> <li>This is not a matter for the Local Plan; however relevant colleagues in the Council will be made aware of this.</li> </ul>
21	Caroline Brock, Kew Society	Support reference to opposing Heathrow, tackling traffic, noise and air pollution. Support retention of smaller retail units, new policy LP 33 on telecoms facilities as well as new policies LP40 and LP 41, including designating London House as Key Office Area.	Noted
22	Heather Mathew, Richmond CVS	Need to recognise the voluntary and community sector role in the Local Plan in terms of their role as employers, in contributing to a sense of place, the development of communities and residents health and well-being. It should be included to inform investment in social and physical infrastructure.	<ul style="list-style-type: none"> <li>Add further references to the important role of the voluntary and community sector in sections 2, 3 and 13.</li> </ul>
23	Jenine Langrish	Support the commitment to sustainability, biodiversity, protecting green spaces and the opposition to Heathrow expansion.	Noted
24	Myrna Jelman	Local Plan Omissions: (1) Increase accountability and performance of Council bodies, including Richmond Housing Partnership (no clarity as to who RHP is accountable to). (2) Managing/culling some of the local urban fox population.	<ul style="list-style-type: none"> <li>Accountability to the public is not a matter for the Local Plan. Richmond Housing Partnership (RHP) is an approved housing association that provide, amongst many other registered providers/social landlords, social housing on behalf of the Council. Registered providers, such as RHP, share the Richmond Housing Register and must be approved by the Homes and Communities Agency.</li> <li>Managing and/or culling local urban fox population is not a planning matter.</li> </ul>
25	Helene Jelman	Local Plan Omissions: (1) Increase accountability and performance of Council bodies, including Richmond Housing Partnership (no clarity as to who RHP is accountable to). (2) Managing/culling some of the local urban fox population.	<ul style="list-style-type: none"> <li>Accountability to the public is not a matter for the Local Plan. Richmond Housing Partnership (RHP) is an approved housing association that provide, amongst many other registered providers/social landlords, social housing on behalf of the Council. Registered providers, such as RHP, share the</li> </ul>

Ref No.	Name / Organisation	Summary of response received	Council's response
			<p>Richmond Housing Register and must be approved by the Homes and Communities Agency.</p> <ul style="list-style-type: none"> <li>Managing and/or culling local urban fox population is not a planning matter.</li> </ul>
26	Dale Greetham, Sport England	Evidence base (in line with para 73 of NPPF) is unsound, particularly in relation to evidence base for indoor sports facilities, where it is not clear that this has been signed off and adopted by the Council.	<p>For clarification, the Council has robust and up-to-date evidence on outdoor sport as well as indoor sport facilities. The following assessments / strategies were signed off and adopted by the Council at its <a href="#">Cabinet meeting on 11 June 2015</a>:</p> <ul style="list-style-type: none"> <li><a href="#">Playing Pitch Assessment</a></li> <li><a href="#">Playing Pitch Strategy</a></li> <li><a href="#">Indoor Sports Facility Needs Assessment</a></li> <li><a href="#">Open Space Assessment</a></li> </ul> <p>Sport England was involved in producing and agreeing the above documents relating to sports facilities and playing pitches.</p>
27	Katharine Fletcher, Historic England	Historic England and separate Greater London Archaeological Advisory Service comments on matters relating both to generic policies and site allocations.	Noted
28	Charles Pineles, Planning Spokesman, Richmond Society	Richmond Society congratulates the council, and local officers, on a comprehensive and tireless up date of the current LDF, against a background of current and future financial restraints. Recognise that residents know and acknowledge that a local authority can no longer be all things to all men.	Noted
29	Peter Willan, Old Deer Park Working Group	<p>Old Deer Park Working Group: members of The Richmond Society, The Kew Society, The Friends of Richmond Green, The Friends of Old Deer Park and The St Margaret's Estate Residents Association.</p> <p>Publication of its report: The Old Deer Park, Richmond - Re-connecting the Town to its local park - Realising an under-recognised parkland asset - A framework for conservation and enhancement.</p> <p>Old Deer Park Working Group is concerned by the absence of a draft Proposals Map.</p> <p>Village Plan for Old Deer Park Area – not included in the list of Village Plans, instead, it is included in sites SA 21 and SA 22 by reference to a SPD for the overall Old Deer Park Conservation Area.</p>	<ul style="list-style-type: none"> <li>The existing Proposals Map (2015) will be retained unless indicated otherwise.</li> <li>The Publication Local Plan will be accompanied by a separate consultation document setting out any changes to the Proposals Map.</li> <li>The Council is in the progress of developing a SPD for the Old Deer Park Area, which is not a Village Plan but a development brief that sets out guidance for the future of this area. An informal consultation was undertaken in October – November 2016 to help inform the development of that document which will be the subject of further consultation in 2017.</li> </ul>
30	Celeste Giusti, Greater London Authority on behalf of Mayor of London	The Mayor will issue his formal opinion on general conformity when requested at the second consultation 'publication' stage.	Noted.
31	Andrew Dorrian,	TfL has released the updated South Sub-Regional Transport Plan, now referred to as the Spatial Story of Growth; includes many travel trends and growth	<ul style="list-style-type: none"> <li>Noted. This will be considered in the update of the Infrastructure Delivery Plan.</li> </ul>

Ref No.	Name / Organisation	Summary of response received	Council's response
	Transport for London	<p>aspects, which will be useful context for the Local Plan and preparation of the Infrastructure Delivery Plan.</p> <p>Renewed emphasis being placed on the relationship between transport infrastructure and housing development.</p> <p>TfL is keen to investigate with the council any opportunities for developing plans and policies which can deliver new homes along transport corridors or around transport nodes.</p> <p>It will be important to establish funding mechanisms to capture land value uplift to help pay for future infrastructure funding, either through conventional s106 and CIL or other means.</p>	<ul style="list-style-type: none"> <li>• The Spatial Strategy and the policies of the Local Plan identify opportunities for development to come forward by optimising the use of sites, particularly in centres with good public transport accessibility that would be along transport corridors or around transport nodes. However, there is limited land supply and other policy needs to be addressed in the Plan.</li> <li>• The comments in relation to capturing land value uplift are noted. It is assumed that this will be part of TfL's / Crossrail's Business Case in terms of how Crossrail 2 will be funded and paid for. It is not considered that this is a matter for the Local Plan.</li> <li>• It is assumed that further discussions around Crossrail 2 will take place between Transport for London and its partners, including Local Authorities.</li> </ul>
32	Robert Leadbetter, Hon. Director Hampton and Kempton Waterworks Railway	<p>Include the restoration of the Hampton and Kempton Waterworks Railway – running from Oldfield pedestrian gate back up to the Red House (Distributing) reservoir – in the Local Plan.</p> <p>The overview of the proposed project and the route and track-bed description and preservation of the heritage track-bed in Hydes field is important to us.</p>	<ul style="list-style-type: none"> <li>• It is understood that the Kempton Steam Railway, based on a former industrial railway, opened in 2013.</li> <li>• There is a planned second phase of the railway, which will involve the construction of a further three miles of track, leading from the existing loop towards the Upper Sunbury Road, Hampton. The track is proposed to be largely based on the original trackbed, which is owned by Thames Water. It is understood that negotiations are in progress with Thames Water, with the aim of securing a lease for the remainder of the route, after which track construction could commence (subject to planning permission).</li> <li>• Whilst the Council is in principle supportive of the extension of the Hampton and Kempton Waterworks Railway, it is noted that the land is within the ownership of Thames Water. In addition, it is not considered that this is a matter for the Local Plan, as it is not essential to the delivery of the spatial plan and its policies, and that therefore this should be considered within other strategies, such as the Local Implementation Plan for Transport and/or the Cultural Partnership Strategy.</li> </ul>
33	Robert Deanwood, Amec Foster Wheeler on behalf of National Grid	<p>National Grid has one underground cable within Richmond borough, from Wimbledon - Willesden. This forms an essential part of the electricity transmission network in England and Wales.</p> <p>National Grid has a high number of gas distribution apparatus within Richmond borough, with two high pressure gas pipelines and associated equipment from (1) Richmond to Fulham, and (2) Southall to Richmond.</p>	<ul style="list-style-type: none"> <li>• Noted. A reference is added to the adjacent gas compound and gas pipeline for the site allocation for Sainsbury's, Lower Richmond Road, Richmond</li> </ul>
34	Tom Sadler, Bilfinger GVA on behalf of Defence Infrastructure	<p>Kneller Hall, currently occupied by the Royal Military School of Music, does not match the needs of modern military due to age, layout of buildings and site constraints. It does not comply with EU Health and Safety regulations and does not meet operational needs of the school. In January 2016, the closure of Kneller Hall was announced, following a review of nationwide defence estates and with</p>	<ul style="list-style-type: none"> <li>• The NPPF sets out that Plans should meet objectively assessed needs unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits or policies within the NPPF indicate that development should be restricted. The Plan seeks to exceed the London Plan housing target to be in general conformity with the existing</li> </ul>

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	Organisation	<p>the aim of reducing the size of the Ministry of Defence (MOD) by 30% by 2040. The Plan has not been positively prepared; it is not justified; it is not effective; and it is not consistent with national policy.</p> <p>Much of the evidence base used to inform new policies is out of date. Policies do not reflect the draft SHMA (2016) findings.</p> <p>There is no site specific policy in relation to Kneller Hall, and the Plan fails to acknowledge the role that Kneller Hall can play in meeting needs of the borough, and the Plan does not put in place a conclusive policy position to guide future development at Kneller Hall.</p> <p>Therefore, there is a need to add a site specific policy allocation for the Kneller Hall site, acknowledging that this site is soon to be vacant, previously developed land and in an accessible location, including a positively worded policy that supports mixed use development (to include residential uses along with other appropriate and compatible uses), informed by a Masterplan prepared collaboratively with the LPA, stakeholders and the community. Strategic Vision places insufficient weight on the importance of promoting previously developed brownfield sites for housing.</p>	<p>London Plan.</p> <ul style="list-style-type: none"> <li>• A site allocation is to be included for Kneller Hall in the Publication Plan. See response to comment 474 below.</li> <li>• The strategic vision and spatial strategy set out a presumption against the loss of, or building on, greenfield sites as well as MOL/Green Belt in this borough. Therefore, the strategy is clear in terms of prioritising and developing on brownfield land.</li> </ul>
35	James Togher, Environment Agency	<p>Support vision, spatial strategy and objectives.</p> <p>Relevant actions from TE2100 plan and River Thames Scheme could be added to site allocations, for example, opportunities on major riverside sites to renew or set back tidal flood defences and "make space for water".</p> <p>Encourage Councils to identify river restoration / flood risk management projects as part of the local plan process (map showing potential projects in Local Plan could help visualise this).</p>	<ul style="list-style-type: none"> <li>• It is considered that the policies within the Local Plan, including the policy on flood risk as well as river corridors, sufficiently cover TE2100 and the River Thames Scheme. In addition, other Council publications, such as the Local Flood Risk Management Strategy as well as the Strategic Flood Risk Assessment are better placed to set out more guidance on 'making space for water'.</li> <li>• In relation to river restoration, policy LP 18 on river corridors already stipulates that developments should contribute to improvements and enhancements to the river environment. Other specific projects, such as river restoration projects, are not matters for the Local Plan, and would likely be delivered in partnership with other bodies such as the Environment Agency and community groups.</li> </ul>
36	James Togher, Environment Agency	<p>Flood Risk Sequential Test (separate document/evidence base):</p> <p>Welcome completed assessments; where no alternative lower risk sites are available and development is proposed in higher risk zones, it's essential the exception tests are also passed.</p> <p>We recommend completing the exception test for the sites remaining in the higher risk areas before allocating these sites with evidence demonstrating how the two elements of the Exception tests have also been passed.</p> <p>A level 2 SFRA should inform consideration of the Exception Test, and wider safety issues such as flood warnings and evacuation issues should be considered.</p> <p>The design and layout of all new development should be informed by the latest climate change allowances and flood maps and any actions from flood</p>	<ul style="list-style-type: none"> <li>• Noted. An updated and revised Flood Risk Sequential Test is to be published alongside the Publication version of the Local Plan.</li> </ul>

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		management projects such as the TE2100 project and the River Thames Scheme.	
37	Geoff Bond, Chair Ham and Petersham Association	Support for protecting open spaces and limiting development which will help keep the rural feel of Ham and Petersham.	Noted
		<b>Chapter1 - Introduction</b>	
38	Tim Catchpole, Planning Representative Mortlake with East Sheen Society	Need to refer to recent Village Plans in the introduction of the Plan.	<ul style="list-style-type: none"> <li>• Village Plans are referred to in section 2 under the Strategic Context.</li> </ul>
		<b>Chapter2 - Strategic Context, Vision and Objectives</b>	
39	Heather Mathew, Richmond CVS	<p>The Voluntary and Community Sector (VCS) should be references as key partners in creating a 'varied sense of place'.</p> <p>Reference to South London Partnership and the Growth Prospectus – many of Richmond's aspirations are echoed at a regional level, and this could help enhance planning for the borough by aligning it with the wider growth strategy for the region.</p> <p>I have highlighted in red where there are Richmond specific examples or where the VCS is a potential contributor:</p> <p>Twickenham Bid Zone is Richmond first BID and is known as TRY Twickenham <a href="http://www.trytwickenham.com/">http://www.trytwickenham.com/</a> . It brings businesses together to collectively decide on actions to improve the high street and footfall funded through an additional 1% on the business rate. It acts as an information hub and conduit to a group of businesses. Richmond Town Centre is currently in the process of canvassing interest in it being a BID co-ordinated by Richmond Business Retail Association <a href="http://www.richmondtown.org.uk/">http://www.richmondtown.org.uk/</a> There is also the proposed small business hub "The Bridge" on the RACC site referred to earlier.</p> <p>The quality of life offer is enhanced by the VCS. Without a strong and well supported sector your "offer" to business and residents is severely diminished, and an areas ability to "be happy is" reduced. A strong and equal partnership with the VCS significantly contributes to Richmond aspirations in the Local and Community Plan and needs to be recognised.</p> <p>As a result of the government's requirement to reduce rents from April 2015 by 1% which represents in real terms a 2.5% reduction in social landlords budgets Richmond main social landlord RHP ( alongside Paragon and Richmond Churches Housing Trust) have had to reconfigure their budgets to address the shortfall. Unfortunately this has lead to a cut in their wider community services and a</p>	<ul style="list-style-type: none"> <li>• Add further references to the important role of the voluntary and community sector in sections 2, 3 and 13.</li> <li>• An additional paragraph and reference to the South London Partnership is to be added to the introductory section of the Local Plan.</li> <li>• The support of the existing Twickenham BID and forthcoming Richmond BID are recognised in section 3. It is not considered appropriate to refer to detailed projects given the role of the Local Plan is to set out the long term planning framework to influence new development. The Infrastructure Delivery Plan and Infrastructure Delivery Schedule set out further details on infrastructure requirements. Commitments to funding are not matters for the Local Plan.</li> </ul>

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		refocus on very vulnerable clients. They are now looking to the wider VCS for support for their tenants. In addition Richmond has a number of providers of supported living and a high demand for places for young people with disabilities – this will continue as the requirements of the SEND reforms embed. There is a real opportunity for VCS consortium and contributions to development proposals that would build stronger and well supported communities attracting investment and securing section 106 funding for community venues and support. In addition the VCS offers leverage to funding that the statutory sector cannot access. A good example of this is Whitton Link who partnered with LBRUT to secure NHS funding to build a dementia care day care setting in Whitton.	
40	Katharine Fletcher, Historic England	The Vision should encompass the significance of the World Heritage Site, Kew and also the quality of the River Thames. We recommend that separate objectives are included for heritage assets and for high quality design. Objective 10) we suggest this is amended to read: 'Conserve the borough's unique historic and cultural assets that are connected by the River Thames and their settings'	<ul style="list-style-type: none"> <li>• Reference to be added to the vision in relation to the Royal Botanic Gardens, Kew World Heritage Site</li> <li>• It is considered that the objectives in relation to heritage assets and high quality design are complementary, and a minor changes is proposed in this regard</li> <li>• Agree to amend strategic objective 10</li> </ul>
41	Tim Catchpole, Planning Representative Mortlake with East Sheen Society	Support for opposition to expansion of Heathrow. Council needs to explain why it considers the proposed ban to all scheduled night flights between 11.30pm and 6.00am not do-able if a third runway is constructed. Support new village heart in Mortlake, affordable housing and affordable small/medium spaces for employment use.	<ul style="list-style-type: none"> <li>• Support noted.</li> <li>• The issue in relation to the proposed ban to all scheduled night flights is not a matter for the Local Plan.</li> </ul>
42	Charles Pineles, Planning Spokesman, Richmond Society	Support for early consultation; need to acknowledge cuts in central grant to Council and cutting of services or finding new sources of revenue. Need to make resources available to Development Control and to Conservation to ensure retention of in-house expertise to achieve 'exceptional design quality'. CP8 was based on 'maintaining rather than expanding' visitor numbers – now there is support for growth in the visitor economy; increased numbers will need to be catered for, e.g. public conveniences. We would hope that BID / business will primarily finance and solve problems caused by commercial expansion in general, particularly the night time economy.	<ul style="list-style-type: none"> <li>• Noted. Resources for Development Control and Conservation are not matters of the Local Plan.</li> <li>• There is a separate policy relating to the visitor economy, and it is important to note that the policy refers to 'sustainable growth of the visitor economy'.</li> </ul>
43	Cllr Martin Elengorn, Environment Spokesperson Richmond upon Thames Liberal Democrat	Misconception that borough consist of a larger number of villages. Exaggeration of the 'unique' character of each area; this carries the danger of discouraging outstanding new buildings in parts that have a more humdrum character.	<ul style="list-style-type: none"> <li>• The Council has decided to use the term 'villages', as defined within the glossary as: "A term applied to define the distinct and local areas in this borough as determined by local communities." It therefore also applies to and encompasses towns. It should be noted that the glossary already mentions that village areas have been determined by local communities, and therefore it is not necessary to repeat this in the policy.</li> <li>• Comments in relation to 'unique' are noted. In this context, the Council</li> </ul>

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	Councillors Group		considers that the reference to 'unique' is not an exaggeration as the village areas are distinctive and recognisable, and this is a reflection of the different characteristics of the borough's village areas. It does not imply that any outstanding new buildings would be discouraged.
44	Cllr Martin Elengorn, Environment Spokesperson Richmond upon Thames Liberal Democrat Councillors Group	2.1.12: Delete first sentence and substitute "Village Plans have been developed for [14?] areas of the borough, the areas having been identified by residents as the ones to which they feel most affinity." In second sentence delete "village". In last sentence replace "the village areas" by "each area".	<ul style="list-style-type: none"> <li>The Council has decided to use the term 'villages', as defined within the glossary as: "A term applied to define the distinct and local areas in this borough as determined by local communities."</li> </ul>
45	Cllr Martin Elengorn, Environment Spokesperson Richmond upon Thames Liberal Democrat Councillors Group	2.1.13: Replace first three sentences with "Each area is distinctive in terms of the community, facilities and local character and most contain many listed buildings and conservation areas." In fourth sentence add "many" before "residents" and "help" before "shape" and replace "Document" with "Documents". In the fifth sentence replace "of the village area" by "each". In the sixth sentence add "often" before "the main".	<ul style="list-style-type: none"> <li>The Council has decided to use the term 'villages', as defined within the glossary as: "A term applied to define the distinct and local areas in this borough as determined by local communities."</li> </ul>
46	Cllr Martin Elengorn, Environment Spokesperson Richmond upon Thames Liberal Democrat Councillors Group	2.1.16: Replace "air-craft" by "aircraft"	Agreed
47	Rob Gray, Friends of the River Crane Environment (FORCE)	Support for vision	Noted
48	Rob Gray, Friends of the River Crane Environment	Support for Green Infrastructure as a separate element of infrastructure and relating objectives. Objective 4 could be amended further as there are no clear means by which these objectives are to be delivered, other than through local planning gain.	<ul style="list-style-type: none"> <li>Support noted</li> <li>Establishing funding mechanisms is not a matter for the Local Plan.</li> <li>It is considered that the value of the green corridors and green infrastructure network for both wildlife and public amenity is well</li> </ul>

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	(FORCE)	<p>The Council needs a detailed evaluation of the existing value and potential of the borough's green infrastructure and the means of delivering upon this potential. The Plan needs to acknowledge the value of the green corridors from both a wildlife and public amenity perspective. Need for implementation through joint working with adjacent boroughs and cross borough organisation.</p> <p>Need to mention value of open spaces and wildlife corridors as dark corridors for the benefits of nocturnal wildlife including bats. There is a need to identify and to protect and enhance these areas and corridors.</p>	<p>recognised throughout the Plan. Also refer to ultimate paragraph under section 1 of the Strategic Vision ('Protection Local Character').</p> <ul style="list-style-type: none"> <li>• The Council considers that the Plan, its vision and objectives, as well as the policies read as a whole, emphasise the value of open spaces and wildlife corridors, and these are protected under the Metropolitan Open Land and/or Other Site of Nature Importance designations.</li> <li>• In relation to wildlife corridors, including dark corridors, whilst it is acknowledged that the effects of, amongst other things, lighting from sources outside of, but in close proximity to for example rivers, can undermine their ecological value, it should be noted that the Council's Local Plan and its policies need to be read as a whole. Therefore, in determining planning applications that could for example affect the River Crane, any potential impacts on habitats and/or species such as bats, will be considered in accordance with the Council's planning policies, including policies on biodiversity, open land, river corridors and floodlighting.</li> </ul>
49	Alison Mackay, Colliers on behalf of Greggs Plc	<p>Support for the vision but need to take a pragmatic approach to redevelopment of existing sites, including Greggs.</p> <p>Greggs site has potential to enhance environment, improve residential amenity and provide much needed purpose built accommodation for start-up and small local businesses.</p> <p>The proposed safeguarding of existing industrial and office accommodation for employment only uses and the viability issues relating to this approach means that it is unlikely that any new purpose built accommodation will come forward on these sites over the plan period for affordable workspace. The introduction of a residential use on the site would allow for cross subsidised affordable workspace for start-up and local businesses which would be unviable to bring forward on its own.</p>	<ul style="list-style-type: none"> <li>• Richmond borough is designated as 'restrictive transfer' in the London Plan which means that industrial land should not be released for other uses. In addition the Council's own evidence demonstrates a shortage of industrial sites in the borough. Therefore, in order to support a strong and diverse local economy with a variety of employment opportunities, the Council aims to retain industrial uses on the Greggs's Bakery site.</li> <li>• It should also be noted that the Council has carefully identified existing industrial land and business parks, based on thorough evidence and research, as set out within the Council's borough-wide <a href="#">Assessment of Light Industrial and Storage Stock</a> and <a href="#">Appendices</a>. It is important to note that the introduction of non-industrial uses, particularly residential uses, could undermine the continued operation of industrial uses.</li> <li>• The Council's existing research is also supplemented by an update of the Employment Land Study. This research is underway to establish a comprehensive, up-to-date and robust evidence base in relation to employment land in the borough. This is to be published alongside the Publication version of the Local Plan.</li> <li>• It needs to be acknowledged that the borough has a very limited supply of industrial floorspace and demand for this type of land is high. The London Plan states that a 'restrictive' approach towards the transfer of industrial land to other uses should be adopted in the borough, which means that industrial land should not be released for other uses. Therefore, in order to deliver this key priority and strategic objective, locally important industrial land and business parks, which are of particular importance for warehousing, distribution, storage and other industrial employment as well</li> </ul>

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			<p>as locally important creative industries and other key employment facilities, are identified in the Local Plan. Any loss of industrial space within these areas will be strongly resisted. This is to ensure that the borough can continue to provide for local business and employment needs.</p> <ul style="list-style-type: none"> <li>In addition, the GLA's Industrial Land Supply and Economy Study (2015) demonstrates that the borough has a very limited supply of industrial land, with only 17.3 hectares of general and light industrial space (B2 and B1(c)), and 8.1 hectares of warehousing and storage (B8) facilities; this is amongst the lowest of all the London boroughs. It is therefore expected that the 'restrictive transfer' approach will be retained within the next London Plan. Therefore there is a presumption against loss of any industrial or other such employment space in all parts of the borough, and any loss will be particularly strongly resisted in the listed important industrial land and business parks.</li> </ul>
50	William Mortimer	<p>2.1.8: More emphasis on social awareness of individual community needs (reference to FiSH as charitable welfare organisation). Need to identify where local community can participate with the Council on emergency response (e.g. flooding, airliner crash, terrorist activity), which would render transportation and telecoms services inoperable.</p> <p>2.1.10: emergency situations affect vulnerable people. Plan needs to show that there needs are met</p>	<ul style="list-style-type: none"> <li>The Council has a lot of information published on its public website in relation to accidents and emergencies: <a href="http://www.richmond.gov.uk/accidents_emergencies_and_safety.htm">www.richmond.gov.uk/accidents_emergencies_and_safety.htm</a></li> <li>The Council also has specific advice, guidance and plans in place to deal with emergencies, such as flooding. There is also advice and guidance on how to prepare for an emergency, what to do if you are involved in an emergency, how to get information, coping emotionally and general evacuation advice.</li> </ul>
51	Liz Ayres, Richmond Clinical Commissioning Group	<p>Add: The Local Plan will take into account the work emerging from the NHS South West London Sustainability and Transformation Plan (STP). This plan will tackle the four biggest challenges in health - money, workforce, estates and consistent quality of care - and deliver proactive, preventative care. This work has been jointly carried out by local clinical commissioning groups (CCGs), hospitals, community health services and mental health trusts, with the support of local councils and members of the public.</p>	<ul style="list-style-type: none"> <li>Reference to the NHS South West London Sustainability and Transformation Plan is to be added in the Implementation section of the Plan</li> </ul>
52	Wendy Crammond, Co-Chair Kew Residents Association	<p>Additional (6th) point at 2.1.4: "People have a right to expect a clean environment which will not compromise their health".</p> <p>Air pollution is already a very serious issue and it will remain so unless action is taken.</p>	<ul style="list-style-type: none"> <li>The paragraph in 2.1.4 sets out the overall vision for the borough's Community Plan. As this is an approved and adopted document, the Local Plan cannot amend the Community Plan. However, this will be fed back to the relevant department within the Council who is responsible for the Community Plan.</li> <li>Air pollution is specifically dealt with in policy LP 10 on Local Environmental Impacts, Pollution and Land Contamination</li> </ul>
53	Richard Geary	<p>How is it acceptable for a 5-storey building to be built opposite a row of Victorian terraced houses on Crown Terrace, replacing the previous one-storey building; or a 4-storey building being given permission on Dee Road, at the side of the existing two storey Victorian houses.</p>	<ul style="list-style-type: none"> <li>Noted. The Local Plan sets out the guidance on how policies should be applied. Enforcement issues are not matters for the Local Plan.</li> <li>Heathrow is addressed in paragraphs 2.1.16 and 2.1.17</li> </ul>

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		Support for opposing Heathrow, but how will Council resist BAA's resources if it cannot stand in the way of small scale developers.	
54	Richard Geary	Planning Committee is not accountable to residents.	<ul style="list-style-type: none"> <li>• This is not a matter for the Local Plan</li> </ul>
55	Cllr Martin Elengorn, Environment Spokesperson Richmond upon Thames Liberal Democrat Councillors Group	<p>2.2.1: In The Local Plan Strategic Vision add "towns and" before "villages" and amend sub-heading of PROTECTING LOCAL CHARACTER to read "Towns, villages and historic environment".</p> <p>In the first sentence below add "towns and" before "villages" and delete "unique".</p> <p>In second sentence replace "Villages" by "They".</p> <p>In Residential Quality of Life delete the absurdly overstated "breathtakingly".</p> <p>In the second part of Sustainable growth and transport replace "crucial" with "significant".</p> <p>In A Sustainable and smart borough replace "smart" by "innovative".</p>	<ul style="list-style-type: none"> <li>• The Council has decided to use the term 'villages', as defined within the glossary as: "A term applied to define the distinct and local areas in this borough as determined by local communities."</li> <li>• It therefore also applies to and encompasses towns. It should be noted that the glossary already mentions that village areas have been determined by local communities, and therefore it is not necessary to repeat this in the policy.</li> <li>• Agreed to replace 'Villages' by 'They'.</li> <li>• Agreed to replace 'crucial' by 'significant'</li> <li>• Comments in relation to 'unique' are noted. In this context, the Council considers that the reference to 'unique' or 'breathtakingly' are appropriate – this is the Council's vision for the borough for 2033 and it is considered appropriate for the vision of the Local Plan to paint a picture of the high quality of many of the borough's parks and open spaces .</li> <li>• Agreed to replace 'smart' by 'innovative'.</li> </ul>
56	Cllr Martin Elengorn, Environment Spokesperson Richmond upon Thames Liberal Democrat Councillors Group	2.3.1: Under the first part of Protecting Local Character add "towns and" before "villages", delete "unique" and delete "villages" after "different".	<ul style="list-style-type: none"> <li>• The Council has decided to use the term 'villages', as defined within the glossary as: "A term applied to define the distinct and local areas in this borough as determined by local communities."</li> <li>• Reference to 'unique' is to be retained.</li> </ul>
57	Paul Massey	Support chapter 2.3 Strategic Objectives, particularly "Protecting Local Character".	Noted.
<b>Chapter3 – Spatial Strategy</b>			
58	Katharine Fletcher, Historic England	<p>Chapter 3 Spatial Strategy: Para 3.1.6, p.19 - Amend the reference in the first sentence to read '<i>...the quality of the natural, built and historic environment</i>'.</p> <p>Para 3.1.11, p.20 - amend to read '<i>...along the River Thames and its banks will be maintained and enhanced, and historic views and the setting of heritage assets will be protected..</i>'</p> <p>Para 3.1.13, p.20 - amend to read '<i>The borough is recognised as having exceptional green and open spaces of great historic significance including Richmond Park, Bushy and Home Parks and the Royal Botanic Gardens Kew, which is of international significance and is inscribed as a World Heritage Site.</i></p>	<ul style="list-style-type: none"> <li>• Suggested changes agreed.</li> </ul>

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		<i>The existing areas of designated open land will continue to be protected for their visual amenity, <u>historic</u>, biodiversity, sport and recreation value.'</i> Para 3.1.29, p.23 - define 'sustainable locations' and amend wording as follows: ' <i>...respecting the quality, local character, <u>including heritage value</u>, and amenity of existing neighbourhoods and villages'</i> .	
59	Tim Lennon, Borough Coordinator Richmond Cycling Campaign	We welcome the emphasis on walking and cycling access in s3.1.8.	Noted
60	Charles Pineles, Planning Spokesman, Richmond Society	3.1.9: Support restricting A5 takeaways near schools and need to grant new A5 uses only in most pressing and exceptional circumstances. 3.1.22: does not include adapting the Meadows Hall site off Church Road 3.1.26: support for discouraging a duo culture of estate agents and hairdressers in the town centre 3.1.31: if there is strong demand for employment space, we hope conversion to residential will be less rewarding and will fall. 3.1.37: Richmond Station – consider sensitive planning and genuine consultation, via a competition of architects	<ul style="list-style-type: none"> <li>• Support noted.</li> <li>• Para 3.1.22 relates to all community and social infrastructure facilities in the borough; it would therefore not be appropriate to specifically list Meadows Hall within the Spatial Strategy. Also note that Policy LP28 will apply in relation to Meadows Hall.</li> <li>• Comments in relation to employment space and Richmond Station are noted.</li> </ul>
61	Alison Mackay, Colliers on behalf of Greggs Plc	Object to spatial strategy's 'restrictive' approach towards transfer of industrial land to other uses. London Plan requires locally significant industrial sites to be designated on the basis of robust evidence demonstrating their particular importance for local industrial type functions to justify strategic recognition and protection. Addressing employment need requires a spatial and borough-wide approach rather than reactive safeguarding of existing stock. Other large sites such as SA 20 would be more suitable locations for industrial uses.	<ul style="list-style-type: none"> <li>• Richmond borough is designated as 'restrictive transfer' in the London Plan, which means that industrial land should not be released for other uses. This designation is not a choice or optional for the Council.</li> <li>• The Council's own evidence demonstrates a shortage of industrial sites in the borough. Therefore, in order to support a strong and diverse local economy with a variety of employment opportunities, the Council aims to retain industrial uses on the Gregg's Bakery site.</li> <li>• It should also be noted that the Council has carefully identified existing industrial land and business parks, based on thorough evidence and research, as set out within the Council's borough-wide <a href="#">Assessment of Light Industrial and Storage Stock</a> and <a href="#">Appendices</a>.</li> <li>• The Council's existing research is also supplemented by an update of the Employment Land Study. This research is underway to establish a comprehensive, up-to-date and robust evidence base in relation to employment land in the borough. This is to be published alongside the Publication version of the Local Plan.</li> <li>• It needs to be acknowledged that the borough has a very limited supply of industrial floorspace and demand for this type of land is high. The London Plan states that a 'restrictive' approach towards the transfer of industrial land to other uses should be adopted in the borough, which means that</li> </ul>

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			<p>industrial land should not be released for other uses. Therefore, in order to deliver this key priority and strategic objective, locally important industrial land and business parks, which are of particular importance for warehousing, distribution, storage and other industrial employment as well as locally important creative industries and other key employment facilities, are identified in the Local Plan. Any loss of industrial space within these areas will be strongly resisted. This is to ensure that the borough can continue to provide for local business and employment needs.</p> <ul style="list-style-type: none"> <li>• In addition, the GLA's Industrial Land Supply and Economy Study (2015) demonstrates that the borough has a very limited supply of industrial land, with only 17.3 hectares of general and light industrial space (B2 and B1(c)), and 8.1 hectares of warehousing and storage (B8) facilities; this is amongst the lowest of all the London boroughs. It is expected that the 'restrictive transfer' approach will be retained within the next London Plan. Therefore there is a presumption against loss of any industrial or other such employment space in all parts of the borough, and any loss will be particularly strongly resisted in the listed important industrial land and business parks.</li> <li>• With reference to SA 20, Sainsbury's on Lower Richmond Road, it should be noted that this is an existing retail site and that the existing retail floorspace will be required to be retained in any redevelopment proposal. As can be seen from the Local Plan's spatial strategy and site allocations, there are no larger sites available for allocation for new industrial uses and therefore the spatial strategy's approach is to protect existing industrial uses, particularly those identified in the Local Plan.</li> </ul>
62	Myrna Jelman	3.1.26 and 3.1.41: no good provision for services in Sheen Road local parade (3 Chinese restaurants in the space of 100 metres); there is insufficiently good range of food provision for this parade. In contrast, Friarstile Road now boasts a small Sainsbury's local and several pleasant looking cafes/bakeries which allows local people to buy fresh fruit and vegetables, cakes as well as tinned and other goods.	<ul style="list-style-type: none"> <li>• Noted. Many things influence what shops appear on a high street, including location, customer base and traders' individual preferences. Although the Council has limited influence on the mix of shops, it helps to make the high street an attractive place to invest by maintaining the environment and providing funding to support local activity, alongside that raised by local businesses.</li> </ul>
63	Helene Jelman	3.1.26 and 3.1.41: no good provision for services in Sheen Road local parade (3 Chinese restaurants in the space of 100 metres); there is insufficiently good range of food provision for this parade. In contrast, Friarstile Road now boasts a small Sainsbury's local and several pleasant looking cafes/bakeries which allows local people to buy fresh fruit and vegetables, cakes as well as tinned and other goods.	<ul style="list-style-type: none"> <li>• Noted. Many things influence what shops appear on a high street, including location, customer base and traders' individual preferences. Although the Council has limited influence on the mix of shops, it helps to make the high street an attractive place to invest by maintaining the environment and providing funding to support local activity, alongside that raised by local businesses.</li> </ul>
64	Tim Lennon, Borough Coordinator	Cycling is an afterthought in the Local Plan not seen as mode of transport but as a recreational activity. It needs to be treated as standard form of transport. High volumes of car parking are not essential to the vitality of town centres	<ul style="list-style-type: none"> <li>• The Council considers that cycling is sufficiently covered in the Local Plan, not just as a recreational activity but as a mode of transport. Cycling is part of the strategic vision, part of the strategic objectives as well as the spatial</li> </ul>

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	Richmond Cycling Campaign	<p>(there is no data to support this). Plan does not mention cycling specific facilities, such as cycle parking, dedicated cycle lanes etc. Recommended wording in spatial strategy: 'A main element of the Spatial Strategy is to provide safe places to cycle throughout the borough, focussing on the recognition that only the actual provision of cycling separate from motor traffic, on clear, well-signed, direct routes, will encourage reasonable numbers of people to start cycling instead of driving.' Wherever humanly possible, places should be able to be accessed by foot or by cycle.</p>	<p>strategy. There are also references to cycling within the Green Infrastructure, Social and Community Infrastructure and Public Open Space, Play Space, Sport and Recreation policies, and importantly within the Health and Wellbeing policy. Emphasis on cycling as a mode of transport is covered in detail in Policy LP44 Sustainable Travel Choices (specifically paras 11.1.4-11.1.9) and cycle parking standards are covered within Policy LP45.</p> <ul style="list-style-type: none"> <li>It should be noted that this is the Local Plan and not the borough's cycling strategy or Local Implementation Plan. For information, the Council is carrying out a public consultation on the borough's Cycling Strategy in the autumn of 2016: <a href="https://consultation.richmond.gov.uk/environment/cycling">https://consultation.richmond.gov.uk/environment/cycling</a></li> </ul>
65	Tim Catchpole, Planning Representative Mortlake with East Sheen Society	Support for office space in East Sheen and creating a 'centre' for the village at Milestone Green, including improving convenience of shopping.	Noted
66	Cllr Martin Elengorn, Environment Spokesperson Richmond upon Thames Liberal Democrat Councillors Group	3.1.4: In line 5 replace "the unique" by "distinctive"	<ul style="list-style-type: none"> <li>Agreed.</li> </ul>
67	Heather Mathew, Richmond CVS	<p>3.1.16: recognise newer heritage attractions which bring significant numbers to the borough such as Strawberry Hill House. Acknowledge role of volunteers, who are lifeblood of heritage and cultural settings, such as at Richmond station and in arts services (e.g. Orleans Houser Gallery and borough libraries). Include Kneller Hall as proposal site for development (for example for homes; Rugby Academy) – heritage status of building would benefit from a clear steer from the Council's perspective of parameters that would be set around any proposed development. RFU's World Cup Legacy project, i.e. sports facilities at St Mary's University, which is accessible to wider community and encourages legacy of physical fitness, could be referenced in terms of developing a sense of place</p>	<ul style="list-style-type: none"> <li>Add further references to the important role of the voluntary and community sector in sections 2, 3 and 13. The specific role of volunteers at heritage and cultural settings is not considered a matter for the Local Plan.</li> <li>The Infrastructure Delivery Plan and Infrastructure Delivery Schedule set out further details on infrastructure requirements.</li> </ul>

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68	Cllr Martin Elengorn, Environment Spokesperson Richmond upon Thames Liberal Democrat Councillors Group	3.1.6: In line 5 delete "for" In line 10 replace "the" by "a".	<ul style="list-style-type: none"> <li>• Agreed</li> </ul>
69	Cllr Martin Elengorn, Environment Spokesperson Richmond upon Thames Liberal Democrat Councillors Group	3.1.10: Replace second line by "towns and villages. The local character of each is distinctive, recognisable and".	<ul style="list-style-type: none"> <li>• The Council has decided to use the term 'villages', as defined within the glossary as: "A term applied to define the distinct and local areas in this borough as determined by local communities." It therefore also applies to and encompasses towns.</li> </ul>
70	Cllr Martin Elengorn, Environment Spokesperson Richmond upon Thames Liberal Democrat Councillors Group	3.1.11: In line 4 add "towns and" before "villages".	<ul style="list-style-type: none"> <li>• The Council has decided to use the term 'villages', as defined within the glossary as: "A term applied to define the distinct and local areas in this borough as determined by local communities." It therefore also applies to and encompasses towns.</li> </ul>
71	Cllr Martin Elengorn, Environment Spokesperson Richmond upon Thames Liberal Democrat Councillors Group	3.1.13: In line 13 replace "the" by "a".	<ul style="list-style-type: none"> <li>• Agreed</li> </ul>
72	William Mortimer	3.1.20: Lack of response to emergency situations, the resources that will need to be stored, communications and transport infrastructure requirements and systems that will need to be deployed	<ul style="list-style-type: none"> <li>• Comments and concerns in relation to emergency and disaster management are noted. One of the duties imposed upon Local Authorities under the Civil Contingencies Act (2004) is to assess the risk of an emergency occurring within or affecting their geographical area. This duty</li> </ul>

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			<p>is discharged at the Local Resilience Forum (LRF) level and is a collaborative evaluation of risk used to inform emergency planning, business continuity and warning and informing the public.</p> <ul style="list-style-type: none"> <li>The Council has a lot of information published on its public website in relation to accidents and emergencies: <a href="http://www.richmond.gov.uk/accidents_emergencies_and_safety.htm">www.richmond.gov.uk/accidents_emergencies_and_safety.htm</a></li> <li>The Council has specific advice, guidance and plans in place to deal with emergencies, such as flooding. There is also advice and guidance on how to prepare for an emergency, what to do if you are involved in an emergency, how to get information, coping emotionally and general evacuation advice.</li> <li>If you would like to discuss this further, please contact the Council's Emergency Planning Officer at: <a href="mailto:emergency.planning@richmond.gov.uk">emergency.planning@richmond.gov.uk</a></li> </ul>
73	Cllr Martin Elengorn, Environment Spokesperson Richmond upon Thames Liberal Democrat Councillors Group	3.1.34: In line 4 add "town and" before "village"	<ul style="list-style-type: none"> <li>The Council has decided to use the term 'villages', as defined within the glossary as: "A term applied to define the distinct and local areas in this borough as determined by local communities." It therefore also applies to and encompasses towns.</li> </ul>
74	Cllr Martin Elengorn, Environment Spokesperson Richmond upon Thames Liberal Democrat Councillors Group	3.1.39: In line 9 delete "for the village".	<ul style="list-style-type: none"> <li>The Council has decided to use the term 'villages', as defined within the glossary as: "A term applied to define the distinct and local areas in this borough as determined by local communities."</li> </ul>
75	Sarah Stevens, Turleys for British Land	Support for identifying British Land's site as 'site with potential for change'. It would be useful for the Plan to clarify that the scope of change that relates to redevelopment and improvements to public realm.	<ul style="list-style-type: none"> <li>Supported noted.</li> <li>If public realm is part of a scheme, policies as set out in the Local Plan and any other adopted policies and/or guidance would apply.</li> </ul>
<b>Chapter 4 – Local Character and Design</b>			
76	Katharine Fletcher, Historic England	Strong support for a positive strategy for the historic environment and an overarching paper to address strategic character and heritage issues	Noted
77	Matthew Eyre, RPS CgMs on behalf of	Support approach of consolidating policies. No Conservation Area Study / Management Plan has to date been prepared in relation to the Hampton Court Park Conservation Area, which contains	<ul style="list-style-type: none"> <li>All Conservation Area Studies and Statements are published on the <a href="#">Council's website</a>.</li> <li>The Statement relating to Hampton Court Park can be found at</li> </ul>

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	Historic Royal Palaces (HRP)	significant heritage assets, including the Scheduled Ancient Monument and listed buildings of Hampton Court Palace. Need is particularly strong because new policies give increased weight to consideration of such studies/plans.	<a href="http://www.richmond.gov.uk/conarea60_a3_rgb.pdf">www.richmond.gov.uk/conarea60_a3_rgb.pdf</a>
78	Geoff Bond, Chair Ham and Petersham Association	Would like to see stronger emphasis on heritage sites and conservation areas with appropriate buffer zones around each.	<ul style="list-style-type: none"> <li>• There are no defined or established buffer zones for conservation areas. A map for the buffer zone of the Kew World Heritage site has been included in the Plan.</li> </ul>
79	Rachel Botcherby, Planning Advisor, London and South East National Trust	Support for policies LP4, LP5, LP 7, LP 9, LP 10	Noted
<b>Policy LP 1 Local Character and Design Quality</b>			
80	Katharine Fletcher, Historic England	Policy LP 1 Local character and Design Quality, p.30 - in part 4) we suggest the following amendment: '... <i>relationship to the public realm, heritage assets and natural features</i> '.	<ul style="list-style-type: none"> <li>• Agreed; add 'heritage assets'</li> </ul>
81	Rachel Botcherby, Planning Advisor, London and South East National Trust	Support	Noted
82	Sarah Stevens, Turleys for British Land	Support	Noted
83	Brian Willman, Chair Ham and Petersham Neighbourhood Forum	Support for emphasis on a contextual approach and high architectural and urban design quality. Need to refer to Ham and Petersham Neighbourhood Plan in 'What the evidence says', which will supplement the Council's work on conservation areas. LP 1 point 4: We suggest making reference to the <i>design</i> of the public realm in addition the 'relationship to the public realm'.	<ul style="list-style-type: none"> <li>• Para 4.1.2 already refers to the Ham and Petersham Neighbourhood Plan.</li> <li>• If public realm is part of a scheme, the entire policy would also apply to the <i>design</i> of this, and as such, the design of the public realm is already sufficiently covered.</li> </ul>
84	Ben Mackworth-Praed, on behalf of the Barnes Community Association	P.31 para C P.30 para A5 and P 32 - 4.1.9: P.31 para C: Why has second para of DMDC been omitted? P.30 para A5 and P 32 - 4.1.9: Gated developments should be forbidden not just resisted.	<ul style="list-style-type: none"> <li>• In relation to the 2<sup>nd</sup> para of the existing policy, it should be noted that this has been included within the supporting text at para 4.1.16. This states that "The Council will use its powers to remove any harmful advertisement or hoarding erected without consent and where appropriate and practical, to challenge existing hoardings and advertisements that cause demonstrable harm to amenity and public safety." As this is largely a matter relating to enforcement and implementation of the policy, it is not considered appropriate to include this within the main policy text.</li> </ul>

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			<ul style="list-style-type: none"> <li>The main policy states that "gated developments will not be permitted". It is considered that this is sufficiently strong and appropriate.</li> </ul>
85	Charles Pineles, Planning Spokesman, Richmond Society	Support for high quality design and Article 4 Directions in relation to Richmond town centre (para 7.1.25)	Noted
86	Cllr Martin Elengorn, Environment Spokesperson Richmond upon Thames Liberal Democrat Councillors Group	<p>Policy LP1: A Line 3 - add "towns and " before "villages"</p> <p>Line 16 - add "green roofs and walls" after "adaptability"</p> <p>4.1.1 Line 2 - after "smaller" delete "villages" and after "areas" insert "identified by residents as the ones with which they identify". After "Each" replace "village" by "area". Line 4 - add "towns and" before "villages"</p> <p>Line 5 - after "with" add "most containing" and after "buildings" add "and"</p> <p>Line 6 - delete "village is unique" and replace by "area is distinctive". 4.1.2 Line 2 - delete "village"</p> <p>Line 5 - after "of" delete rest of sentence and replace by "each area"</p> <p>Line 6 - after "are" insert "often".</p> <p>4.1.3. Line 5 - after "approach" add "or stifle innovation, originality or initiative"</p> <p>Line 7 - replace "following" by "having regard to". 4.1.4 Line 3 - before "a key" add "often"</p> <p>Line 4 - delete "the"</p> <p>Line 5 - replace "that" by "where they" and replace "its" by "a".</p> <p>After "identity" add "Opportunities should be taken to improve the general level of design of an area where this is appropriate". Add "generally" before "respect".</p> <p>Add new paragraph 4.1.4A "The Council will re-establish its local design review arrangements and give great weight to outstanding or innovative design which help raise the standard of design more generally in the area."</p> <p>4.1.5 Line 2 - replace "which reflect" with "reflecting"</p> <p>Line 3 - at end add "where appropriate".</p> <p>4.1.6. Line 1 - delete "The harmony of"</p> <p>4.1.16 Line 4 - replace "and" by "or".</p>	<ul style="list-style-type: none"> <li>The Council has decided to use the term 'villages', as defined within the glossary as: "A term applied to define the distinct and local areas in this borough as determined by local communities." It therefore also applies to and encompasses towns. It should be noted that the glossary already mentions that village areas have been determined by local communities, and therefore it is not necessary to repeat this in the policy.</li> <li>Some minor changes are made as suggested in 4.1.1; however, the Council is of the view that the village areas are unique and distinctive and no changes are to be made in this regard.</li> <li>Green roofs and walls are already covered in policy LP 17 Green Roofs and Walls.</li> <li>The suggested reference to 'stifle innovation, originality or initiative' is unnecessary as this is guidance contained within the PPG.</li> <li>In para 4.1.4 it is acknowledged that opportunities should be taken to improve the general level of design of an area and appropriate wording in this regard is to be included in the Publication Plan.</li> <li>Proposed new para 4.1.4A will not be included as this is already within the PPG and a matter of how the policy could be implemented.</li> <li>Agree to change 'which reflect' to 'reflect'</li> <li>Add some additional wording to 4.1.5 to reflect that this should make a positive contribution to appearance and character of an area</li> <li>Agree to delete 'the harmony of'</li> <li>Agree change to para 4.1.16</li> </ul>
87	Tim Lennon, Borough Coordinator Richmond Cycling Campaign	We welcome the emphasis on walking and cycling access in s4.1.9.	Noted
		<b>Policy LP 2 Building Heights</b>	
88	Brian Willman, Chair Ham and	Need to define 'dense', 'density' and appropriate densities. Need for clarity as to how the London Plan Density Matrix will be taken into	<ul style="list-style-type: none"> <li>Policy LP34 on New Housing already refers to the London Plan Density Matrix. This policy also states that "This guidance, along with local factors,</li> </ul>

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	Petersham Neighbourhood Forum	account (9.1.6) and what this means to Ham and Petersham	such as proximity to facilities and to public transport routes, and the character of the surrounding area, will be taken into account in reaching the appropriate density for a particular site." It is not considered that further guidance is required within the Building Heights policy and how this applies to Ham and Petersham as this will need to be dealt with as and when schemes come forward in relevant parts of the borough, depending on their PTAL rating and a site specific assessment. Further guidance on the Density Matrix can be found within the London Plan policy 3.4 (Optimising housing potential).
89	Kevin Goodwin, RPS CgMs for Goldcrest Land	Policy adopts a negative approach to buildings that may be taller than their surrounds, which sets a hurdle for developments. Policy fails to take positive approach in locations with good PTAL that are suitable for buildings higher than existing development. Recommended change is: 6. <b>carefully assess</b> buildings that are taller than the surrounding townscape <b>and support them other than in exceptional circumstances, such as where</b> the development is of <b>such</b> high architectural design quality and standards, delivers public realm benefits and as such has a wholly positive impact on the character and quality of the area	<ul style="list-style-type: none"> <li>• In line with the Council's evidence base, there are many parts of the borough, except the identified centres such as Richmond and Twickenham, where taller buildings are inappropriate.</li> <li>• Para 4.2.2 sets out the areas where higher density development would be appropriate.</li> <li>• The higher PTAL areas (5 and 6) are generally located within Richmond and Twickenham town centres, which are already identified in the Council's evidence base as well as within the policy as areas appropriate for 'taller' buildings.</li> <li>• It is not considered unreasonable to adopt a more stringent approach for developments that would be taller than the surrounding townscape as this is based on the borough-wide evidence. Therefore, no change is to be made in light of this response other than removing 'such' before 'high architectural design quality'.</li> </ul>
90	Katharine Fletcher, Historic England	Support for policy. Need for clarity which of the advice notes issued by English Heritage/Cabe (2007) and Historic England (2015) is being referenced. Amend new policy LP 2 6) to reflect that character is not wholly a subset of design: ' <i>...delivers public realm benefits and <del>as such</del> has a wholly positive impact on the character and quality of the area</i> ' - Amend para 4.2.5, p.36, final sentence, to read ' <i>...They can also dominate, obscure or detract from the setting of Listed Buildings, Buildings of Townscape Merit, Conservation Areas, Scheduled Monuments, Registered Parks and Gardens and the World Heritage Site at Kew.</i> '	<ul style="list-style-type: none"> <li>• The Advice Note on Tall Buildings produced by Historic England should be followed. This is already included within the policy.</li> <li>• Minor amendments made to policy in line with respondent's suggestion, including adding reference to other heritage assets.</li> </ul>
91	Charles Pineles, Planning Spokesman, Richmond Society	Support	Noted
92	Richard Geary	'Taller' buildings are defined as those being significantly taller than the neighbouring buildings. This is the recommendation but obviously does not apply to residents of Crown Terrace; two-story terrace buildings dwarfed by five	<ul style="list-style-type: none"> <li>• This comment relates to the implementation of the policy rather than a suggestion for change.</li> </ul>

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		storey redevelopments.	
93	Tim Catchpole, Planning Representative Mortlake with East Sheen Society	Support reference to higher densities being achieved in East Sheen without recourse to tall or taller buildings within its centre.	Noted
94	Cllr Martin Elengorn, Environment Spokesperson Richmond upon Thames Liberal Democrat Councillors Group	Policy LP 2: In 1 add "generally" before "reflecting" Omit 5 which adds nothing. 4.2.1 Line 2 - add "often" before "produced" Line 3 - replace "central" by "important"	<ul style="list-style-type: none"> <li>• Agree to add 'generally' as this is for clarification purposes</li> <li>• Point 5 is an important aspect of this policy, especially on larger development sites, where owners/applicants may seek to create a landmark building, and where the Council is clear that this should be done without recourse to tall buildings</li> <li>• Agree to change 'central' to 'important'; but disagree with inserting 'often' prior to 'produced'</li> </ul>
95	Sarah Stevens, Turleys for British Land	Support for objective of policy, but not all new buildings should necessarily reflect the prevailing building heights. Amend point 1 of LP 2: <i>require buildings to make a positive contribution towards the local character, townscape and skyline, reflecting 'considering' or 'responding to' the prevailing building heights within the vicinity;</i> Point 6 in relation to buildings that are taller than the surrounding townscape, this should be positively re-worded so that it states: <b>resist buildings that are taller than the surrounding townscape will only be acceptable provided that they are supported by urban design analysis that demonstrates the proposal is part of a strategy that will meet the criteria set out in point 3 of this policy and other than in exceptional circumstances, such as where</b> <i>the development is of such high architectural design quality and standards, delivers public realm benefits and as such has, in balance, a wholly positive impact on the character and quality of the area;</i> The requirement for full planning applications for 'any building that exceeds the prevailing building height within the wider context and setting' (Point 7) is too onerous. We therefore suggest that the wording should be changed to: <b>typically require full planning applications will be required for any building that exceeds the prevailing building height within the wider context and setting. If an outline application is submitted this will need to be supported by urban design analysis and design parameters that demonstrate that the proposal is part of a strategy and will be of the highest architectural quality.</b> Supporting text 4.2.2 (final bullet point) states that 'Elsewhere in the Borough	<ul style="list-style-type: none"> <li>• In line with the Council's evidence base, there are many parts of the borough, except the identified centres such as Richmond and Twickenham, where taller buildings are inappropriate.</li> <li>• A change is made in light of comment 94 to add 'generally' reflecting prevailing building heights for point 1 of LP 2.</li> <li>• In relation to point 6 of LP 2, it is not considered unreasonable to adopt a more stringent approach for developments that would be taller than the surrounding townscape as this is based on the borough-wide evidence. Therefore, no change is to be made in light of this response other than removing 'such' before 'high architectural design quality'.</li> <li>• Point 7 is not considered too onerous because if a building is to exceed the prevailing building height, an outline application would be insufficient as the proposal would need to be assessed in light of the other criteria (i.e. points 1 to 6) as set out in this policy and full design justification will be needed which can only be established as part of a full application.</li> <li>• It is considered that para 4.2.2 is clear in that the different areas of the borough are addressed where tall or taller buildings are suitable or inappropriate. The final bullet point needs to be read in context with the overall paragraph.</li> </ul>

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		<i>[outside identified centres] it is considered that taller or tall buildings are likely to be inappropriate and out of character with its historic context and local distinctiveness'. This statement does not apply to all sites 'elsewhere in the Borough' and should be amended to acknowledge this. Greater flexibility needs to apply to the location of taller buildings (less than 18 metres/below 6-storeys) and tall buildings.</i>	
96	Tim Catchpole, Planning Representative Mortlake with East Sheen Society	We note the reference to tall or taller buildings being possibly appropriate at inter alia the Stag Brewery site in Mortlake subject to the criteria set out.	Noted
97	Celeste Giusti, Greater London Authority on behalf of Mayor of London	Mayor agrees that higher densities can be achieved without necessarily increasing the height of development. As outlined in the supporting text, there are areas in the borough where tall or 'taller' buildings may be appropriate. This potential should be reflected in the policy, which is restrictive, compared to its supporting text.	<ul style="list-style-type: none"> <li>Noted. See para 4.2.2, which states which parts of the borough may be suitable for 'tall' or 'taller' buildings. It is considered that the supporting text to this policy is clear and that this provides the relevant information on how this policy should be applied.</li> </ul>
98	Mike Allsop, Committee member Strawberry Hill Residents' Association	Strawberry Hill is identified as an area where 'taller' buildings will generally be inappropriate. This is a weakening of existing policy which deems taller buildings to be only appropriate in Twickenham and Richmond. This policy change is not appropriate for Strawberry Hill.	<ul style="list-style-type: none"> <li>As required by the London Plan, the Local Plan needs to set out and define areas that are 'appropriate', 'sensitive' and 'inappropriate' locations for tall buildings.</li> <li>This is therefore not a policy change and the presumption against 'taller' buildings within areas that do not currently have taller buildings remains in place.</li> </ul>
		<b>Policy LP 3 Designated Heritage Assets</b>	
99	Ben Mackworth-Praed, on behalf of the Barnes Community Association	P39 para D: Will this prohibit (under Article 4 Direction or otherwise) Permitted Development in Conservation Areas. How would this have affected 15 Ranelagh Avenue had the new LP been in place? (Also P40 - 4.3.6.)	<ul style="list-style-type: none"> <li>This would not affect any Permitted Development Rights, unless withdrawn by an Article 4 Direction, because generally policies of the Local Plan would not apply for works carried out under PD rights.</li> </ul>
100	Katharine Fletcher, Historic England	LP 3, p38/39 - In the introduction to part A we suggest the wording <i>'The Council will require development to conserve and, <del>protect and</del> where possible, take opportunities to make a positive contribution to the historic environment of the borough. The significance (including the settings) of the borough's designated heritage assets encompassing Conservation Areas, Listed Buildings, Scheduled Monuments and Registered Historic Parks and Gardens will be conserved and enhanced by the following means...'</i> . This is to clarify and to avoid repetition. Many of the points 1 to 7 in part A are only relevant to listed buildings and clearly the references to internal alterations would not apply to buildings in conservation areas. Need to reword.	<ul style="list-style-type: none"> <li>Agreed change in relation to part A of LP 3</li> <li>Minor changes to clarify which criteria apply to Listed Buildings only and other minor changes to clarify the policy</li> <li>Add new para to policy in relation to the need for proposals with Conservation Areas to preserve, and where possible enhance the character or appearance of the Conservation Area.</li> <li>No changes proposed to para 4.3.8, although bullet points have been inserted to provide clarity</li> <li>Remove reference to 'enabling' development and some changes to para 4.3.10</li> </ul>

Ref No.	Name / Organisation	Summary of response received	Council's response
		<p>References to 'substantial' and 'less than substantial' harm are not only relevant to demolition in conservation areas but also to changes that harm any heritage asset.</p> <p>Policy is lacking clarity in terms of broader assessment of proposals within conservation areas and the requirement to preserve or enhance the character or appearance of the conservation area. Para 4.3.8, p41 - The text from the third sentence requires review as there is confusion resulting from the selective naming of assets here.</p> <p>Para 4.3.10 and site allocations – Remove references to 'enabling development', which is inherently a contradiction in any Plan.</p>	
101	Rachel Botcherby, Planning Advisor, London and South East National Trust	Support	Noted
102	Charles Pineles, Planning Spokesman, Richmond Society	<p>4.3 recommend as follows: "It is important to ensure that <u>no benefit accrues to owners</u> arising from <u>their</u> deliberate neglect or damage".</p> <p>LP3, para 6: 'encourage' is not enough when referring to reinstatement, based on past experience. Consider tightening up the wording.</p> <p>Support returning Listed Buildings to original use.</p> <p>Obligations to ensure Listed Buildings are properly maintained should be rigorously enforced.</p>	<ul style="list-style-type: none"> <li>• It is considered that the reference to deliberate neglect or damage is sufficient in its current wording</li> <li>• Strengthened wording by removing 'encourage' and change to 'require, where appropriate,...'</li> <li>• Comment about enforcement is noted</li> </ul>
103	Cllr Martin Elengorn, Environment Spokesperson Richmond upon Thames Liberal Democrat Councillors Group	<p>Policy LP 3: In 3 replace "its" by "their"</p> <p>4.3.1 Line 2 - add "often" before "produced"</p> <p>Line 3 - replace " central" by "important"</p> <p>4.3.7 At end add "It is recognised that older Conservation Area statements contain less detail than more recent ones and that the programme of Conservation Area Studies and Management Plans is incomplete".</p>	<ul style="list-style-type: none"> <li>• Change from 'its' to 'their' agreed</li> <li>• Noted, but no change proposed in relation to 'often' before 'produced'</li> <li>• Agree to replace 'central' by 'important'</li> <li>• Additional wording in relation to para 4.3.7 is inappropriate to include within the Local Plan. No change proposed.</li> </ul>
104	Sarah Stevens, Turleys for British Land	<p>Need to set out positive strategy for conservation and enjoyment of historic environment.</p> <p>Policy needs to recognise that historic environment is not a heritage asset in its own right.</p> <p>Use of NPPF definition for the setting of a heritage asset. Setting of heritage assets should not just be conserved/protected as this could mean neutral or negative parts of the setting would be required to be retained. Need to preserve those elements that contribute positively and improve settings.</p>	<p>The Council's positive strategy for the historic environment, as required by national guidance, is made up of the following (this list is not exhaustive, and it should be noted that there is no requirement for a single document that sets out the strategy):</p> <ul style="list-style-type: none"> <li>• the Local Plan policies relating to heritage assets;</li> <li>• Supplementary Planning Guidance (SPG) and Supplementary Planning Documents (SPDs) on heritage assets, including on locally listed buildings, and Village Planning Guidance;</li> </ul>

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		Refer to 'designated' heritage assets only. Add: " <i>the more important the asset, the greater the weight should be</i> ". Use the term 'normally' resist rather than just resist to recognise that selective/partial demolition may sometimes be beneficial. By definition 'internal and external features...' cannot be reinstated if they have been lost; they no longer have special interest.	<ul style="list-style-type: none"> <li>maintaining and, if required reviewing, Conservation Area boundaries as well as Conservation Area Statements, and where available Conservation Area Studies, and/or Management Plans;</li> <li>ensuring Listed Buildings (including locally listed buildings) are maintained and contribute to the character of the place;</li> <li>Article 4 Directions</li> <li>Site briefs / Masterplans for sensitive sites</li> </ul> <p>In relation to other suggested changes, also see the Council's response to comment 103 above, which sets out how the policy has been made clearer. Although it is not considered necessary to repeat all the guidance already set out in the PPG.</p>
105	Matthew Eyre, RPS CgMs on behalf of Historic Royal Palaces (HRP)	Need for Conservation Area study for Hampton Court Park Conservation Area.	<ul style="list-style-type: none"> <li>All Conservation Area Studies and Statements are published on the <a href="#">Council's website</a>.</li> <li>The Statement relating to Hampton Court Park can be found at <a href="http://www.richmond.gov.uk/conarea60_a3_rgb.pdf">www.richmond.gov.uk/conarea60_a3_rgb.pdf</a></li> </ul>
		<b><i>New Policy LP 4 Non-Designated Heritage Assets</i></b>	
106	Katharine Fletcher, Historic England	Include link to details of the assessments for individual Buildings of Townscape Merit.	<ul style="list-style-type: none"> <li>The policy already refers to the BTM SPD. Other information in relation to designated and non-designated heritage assets can be found on the Council's website.</li> </ul>
107	Sarah Stevens, Turleys for British Land	First para is too onerous and does not reflect national policy. 'Conservation' rather than protection is recognised as part of national policy. Reference should be made to ' <i>weighing up the scale of any harm or loss and significance of the non-designated heritage asset</i> ' (nPPG para 135).	<ul style="list-style-type: none"> <li>The policy states that 'The Council will seek to preserve, and where possible enhance,...' This is not considered too onerous.</li> <li>It is not considered necessary to repeat all the guidance already set out in the PPG within local policies (e.g. in relation to para 135).</li> </ul>
108	Charles Pineles, Planning Spokesman, Richmond Society	Enforcement of policy	<ul style="list-style-type: none"> <li>Noted. This is not a matter for the Local Plan but an enforcement matter.</li> </ul>
		<b><i>Policy LP 5 Views and Vistas</i></b>	
109	Matthew Eyre, RPS CgMs on behalf of Historic Royal Palaces (HRP)	Need for Conservation Area study for Hampton Court Park Conservation Area to ensure policy LP3 functions effectively.	<ul style="list-style-type: none"> <li>All Conservation Area Studies and Statements are published on the <a href="#">Council's website</a>.</li> <li>The Statement relating to Hampton Court Park can be found at <a href="http://www.richmond.gov.uk/conarea60_a3_rgb.pdf">www.richmond.gov.uk/conarea60_a3_rgb.pdf</a></li> </ul>
110	George Burgess, Indigo Planning on behalf of Beechcroft Developments	Policy is too onerous; point 6, which requires views within Conservation Areas to be preserved or enhanced, is repetition of policy elsewhere.	<ul style="list-style-type: none"> <li>Noted. Change proposed in line with Historic England suggestion (see response to comment 111 below)</li> </ul>

Ref No.	Name / Organisation	Summary of response received	Council's response
	Ltd		
111	Katharine Fletcher, Historic England	Suggested changes: In part 5) ' <i>Seek improvements to views ...</i> ' In part 6, review the wording to ensure consistency between the introductory sentence and parts a-c.	<ul style="list-style-type: none"> <li>Amend in line with suggested changes</li> </ul>
112	Sarah Stevens, Turleys for British Land	Policy should focus on those views and vistas that are protected by designations on the Proposals Map. Change as follows: ' <i>require developments whose visual impacts extend beyond that of the immediate street to demonstrate how views and vistas identified on the Proposals Map are protected or enhanced</i> ' Policy is too onerous in relation to visual impacts that extend beyond that of the immediate street.	<ul style="list-style-type: none"> <li>The Council disagrees that this policy should only apply to views/vistas designated on the Proposals Map. It is considered part of good design to identify views within and out of the site that contribute to the character, distinctiveness and quality of the local and wider area. No change proposed.</li> </ul>
113	Peter Willan, Old Deer Park Working Group	Lack of draft Proposals Map to show views and vistas. Vistas/landmarks and views shown in the Crown Estate's The Old Deer Park Richmond - Landscape Strategy, 1999 should continue to be identified.	<ul style="list-style-type: none"> <li>The existing Proposals Map (2015) will be retained unless indicated otherwise.</li> <li>The Publication Local Plan will be accompanied by a document setting out any changes to the Proposals Map.</li> <li>The Old Deer Park Landscape Strategy (1999) was commissioned by the Crown Estate, as landowner, 'to develop estate management policies for their ownership of the Old Deer Park' (Old Deer Park Landscape Strategy 1999 Summary). It is not a document that has been formally adopted by the Council for planning or other purposes and it is not known whether the Strategy is still being used for estate management purposes by the landowner. In addition, whilst the Strategy makes reference to planning policies, these have been superseded by subsequent planning policies adopted by the Council since its publication. The Council is currently preparing a Supplementary Planning Document for the Old Deer Park which is being undertaken within the context of the Council's planning policies. As the Strategy is a well-researched and informative document it provides useful contextual information for the Council in the development of the Supplementary Planning Document with respect of the historic and ecological attributes of the Old Deer Park.</li> </ul>
		<b>Policy LP 6 Royal Botanic Gardens Kew World Heritage Site</b>	
114	Caroline Brock, Kew Society	Support for policy, especially buffer zone and wider setting references	Noted
115	Matthew Eyre, RPS CgMs on behalf of Historic Royal Palaces (HRP)	Support. Consider making referenced documents (i.e. the Royal Botanic Gardens, Kew World Heritage Site Management Plan and the Royal Botanic Gardens and Kew Landscape Master Plan, easily available on the Council website.	Noted

Ref No.	Name / Organisation	Summary of response received	Council's response
116	Katharine Fletcher, Historic England	<p>Strong support.</p> <p>Could consider some re-wording of policy in the interests of clarity:</p> <p><i>'The Council will protect, conserve, promote and where appropriate enhance the Royal Botanic Gardens Kew World Heritage Site, its buffer zone and its wider setting. In doing this the Council will take into consideration that: - The World Heritage Site inscription denotes the highest level of significance to the site as an internationally important heritage asset - The appreciation of the Outstanding Universal Value of the site, its integrity, authenticity and significance, including its setting (and the setting of individual heritage assets within it) should be protected from harm - Appropriate weight should be given to the Royal Botanic Gardens Kew World Heritage Site Management Plan and the Royal Botanic Gardens Kew Landscape Master Plan'</i></p> <p>Reference could be made to the ICOMOS method of heritage impact assessment for World Heritage Sites within the supporting text and to the Mayor's SPG addressing London's World Heritage Sites.</p>	<ul style="list-style-type: none"> <li>• Noted</li> <li>• Suggestions to improve and strengthen the wording of this policy are welcomed and changes are made to the policy, including reference to the ICOMOS method as well as the Mayor of London's SPG on World Heritage Sites.</li> </ul>
117	Charles Pineles, Planning Spokesman, Richmond Society	<p>Southern part of Richmond Athletics Grounds needs attention.</p> <p>Need for managerial ability and resources in relation to Richmond Athletics Ground</p>	<ul style="list-style-type: none"> <li>• It should be noted that more detailed guidance against which future development proposals within the ODP will be considered is currently being drafted through the development of a Supplementary Planning Document for the area. An informal consultation was undertaken in October – November 2016 to help inform the development of that document which will be the subject of further consultation in 2017.</li> <li>• Managerial ability and resources are not matters for the Local Plan.</li> </ul>
118	Peter Willan, Old Deer Park Working Group	<p>References to the Crown Estate's The Old Deer Park Richmond - Landscape Strategy, 1999 have been omitted</p> <p>Reinstatement of 'working with others' required</p>	<ul style="list-style-type: none"> <li>• The Old Deer Park Landscape Strategy (1999) was commissioned by the Crown Estate, as landowner, 'to develop estate management policies for their ownership of the Old Deer Park' (Old Deer Park Landscape Strategy 1999 Summary). It is not a document that has been formally adopted by the Council for planning or other purposes and it is not known whether the Strategy is still being used for estate management purposes by the landowner. In addition, whilst the Strategy makes reference to planning policies, these have been superseded by subsequent planning policies adopted by the Council since its publication. The Council is currently preparing a Supplementary Planning Document for the Old Deer Park which is being undertaken within the context of the Council's planning policies. As the Strategy is a well-researched and informative document it provides useful contextual information for the Council in the development of the Supplementary Planning Document with respect of the historic and ecological attributes of the Old Deer Park.</li> <li>• There is no reference to 'working with others' within the existing adopted policy. However, it should be acknowledged that para 4.6.4 includes references to other bodies that are considered essential in protecting this</li> </ul>

Ref No.	Name / Organisation	Summary of response received	Council's response
			World Heritage Site.
119	Cllr Martin Elengorn, Environment Spokesperson Richmond upon Thames Liberal Democrat Councillors Group	4.6.3: Line 2 - replace "guider" by "guiding"	<ul style="list-style-type: none"> <li>Agreed.</li> </ul>
		<b>Policy LP 7 Archaeology</b>	
120	Katharine Fletcher, Historic England	Strong support GLAAS intends to complete Richmond review of Archaeological Priority Areas in 2017-18.	Noted
		<b>Policy LP 8 Amenity and Living Conditions</b>	
121	Richard Geary	Issues with how policy has been implemented in the past, particularly in relation to adding balconies e.g. I live opposite a building in a Conservation Area where flats up to the fourth storey have recently had balconies added.	<ul style="list-style-type: none"> <li>Comments in relation to the implementation and application of the policy relating to addition of balconies are noted. However, these are matters to be addressed when implementing/enforcing the policy and no changes are proposed to the Local Plan.</li> </ul>
122	Ben Mackworth-Praed, on behalf of the Barnes Community Association	P.49 - LP8.1.: Replace last line with: "They should be improved where possible and economically viable".	<ul style="list-style-type: none"> <li>Change proposed to reflect that where possible, conditions should be improved.</li> </ul>
123	Sarah Stevens, Turleys for British Land	Supporting text states that whilst the minimum distance expected between habitable rooms within residential developments is 20m, a lesser distance may be acceptable in some circumstances. This should be included in main policy.	<ul style="list-style-type: none"> <li>The policy sets out the minimum standards that the Council would expect applicants to follow and comply with. It is acknowledged that there may be site specific circumstances that could prevent 20m to be achieved; however, such circumstances would be seen and treated as exceptions to policy and would be considered on a site-by-site basis. No change proposed.</li> </ul>
124	Neil Henderson, Gerald Eve on behalf of Reselton Properties Ltd	Criterion 2 if overly onerous and does not take account of site specific circumstances Consider following changes: "ensure that appropriate distances between main facing windows of habitable rooms (this includes living rooms, bedrooms and kitchens with a floor area of 13sqm or more) <u>are achieved to ensure</u> reasonable visual privacy for occupants of new development and for occupants of existing properties affected by new development;"	<ul style="list-style-type: none"> <li>The policy sets out the minimum standards that the Council would expect applicants to follow and comply with. It is acknowledged that there may be site specific circumstances that could prevent 20m to be achieved; however, such circumstances would be seen and treated as exceptions to policy and would be considered on a site-by-site basis. No change proposed.</li> </ul>

Ref No.	Name / Organisation	Summary of response received	Council's response
125	Celeste Giusti, Greater London Authority on behalf of Mayor of London	Reconsider whether proposed amenity policies (i.e. 20m distance between windows; and proposed minimum thresholds for gardens), reflect the character across the whole borough	<ul style="list-style-type: none"> <li>The policy sets out the minimum standards that the Council would expect applicants to follow and comply with. It is acknowledged that there may be site specific circumstances that could prevent 20m to be achieved; however, such circumstances would be seen and treated as exceptions to policy and would be considered on a site-by-site basis. No change proposed.</li> </ul>
126	Mike Allsop, Committee member Strawberry Hill Residents' Association	There should be a more explicit policy in relation to balconies, similar to DM DC 6, as balconies continue to be a subject of concern	<ul style="list-style-type: none"> <li>The Council does not consider there to be a need for a separate policy on balconies. It is acknowledged that balconies or terraces on roofs of main buildings can be visually intrusive and result in serious intrusion into the privacy and quiet enjoyment of neighbouring residential properties, as such, an additional criterion is added to the policy in this regard.</li> </ul>
127	Cllr Martin Elengorn, Environment Spokesperson Richmond upon Thames Liberal Democrat Councillors Group	4.8.5: Penultimate line - replace "andan" by " and an"	<ul style="list-style-type: none"> <li>Agreed</li> </ul>
<b>Policy LP 9 Floodlighting</b>			
128	Cllr Martin Elengorn, Environment Spokesperson Richmond upon Thames Liberal Democrat Councillors Group	Add after sixth criterion "The applicant will need to demonstrate that the carbon profile of the installation is minimised and proportionate to the benefit"	<ul style="list-style-type: none"> <li>Energy usage and efficiency as well as smart lighting technology is already addressed within the supporting text.</li> </ul>
129	Ben Mackworth-Praed, on behalf of the Barnes Community Association	P.52 4.9.4: POs must include obligation to maintain correct settings.	<ul style="list-style-type: none"> <li>Agreed; add wording in relation to the need to maintain correct settings within 4.9.4</li> </ul>
<b>Policy LP 10 Local Environmental Impacts, Pollution and Land Contamination</b>			
130	Sarah Stevens, Turleys for	Rephrase 2 <sup>nd</sup> para of policy to clarify that developers should engage with the Council and its officers and respond to advice and guidance provided.	<ul style="list-style-type: none"> <li>Amendments in terms of 'The Council will <b>seek to ensure...</b>' are agreed as they are considered more consistent with the remainder of the policy.</li> </ul>

Ref No.	Name / Organisation	Summary of response received	Council's response
	British Land	The first sentences in New Policy LP10 Sections D and E, and LP28, should state: The Council will <b>seek to</b> ensure... Paragraph 4.10.1, first sentence: 'material' or 'significant' should be inserted before the words 'adverse environmental impacts of development'. Adverse effects that are insignificant should not require mitigation.	<ul style="list-style-type: none"> <li>• Add 'harmful and' in front of 'adverse environmental impacts of development'</li> </ul>
131	Charles Pineles, Planning Spokesman, Richmond Society	4.10.1: "developers <u>should</u> explore ways to minimise..." Should?	<ul style="list-style-type: none"> <li>• 'Should' is considered appropriate in this context. No change proposed.</li> </ul>
132	Cllr Martin Elengorn, Environment Spokesperson Richmond upon Thames Liberal Democrat Councillors Group	Policy LP 10: Line 1 - replace "impacts" by "effects" to avoid repetition. 4.10.11. Line 1 - replace "light pollution" by "artificial lighting"	<ul style="list-style-type: none"> <li>• Both changes agreed</li> </ul>
133	Neil Henderson, Gerald Eve on behalf of Reselton Properties Ltd	Policy should recognise that not all land will require remediation work. Change as follows: "The Council promotes, <u>where necessary</u> , the remediation of <u>contaminated</u> land where development comes forward."	<ul style="list-style-type: none"> <li>• Change agreed as there is a need to recognise that not all land requires remediation work</li> </ul>
134	Ben Mackworth-Praed, on behalf of the Barnes Community Association	P.56 4.10.3: Air, Noise and Light Pollution constraints should also be applied during construction.	<ul style="list-style-type: none"> <li>• Paras 4.10.17 to 4.20.23 already deal with construction impacts</li> </ul>
		<b><i>Policy LP 11 Subterranean developments and basements</i></b>	
135	Caroline Brock, Kew Society	Policy covers some concerns but needs to be strengthened: (1) require Structural Impact Assessment or similar for all adjacent building types (2) need to take account of site specific ground conditions including underground watercourses (3) require evidence that insurance policies are held by the applicant to cover damage to adjacent buildings (4) restriction to one basement level for residences or any other property unless exceptional circumstances are demonstrated Reference to Westminster Council's basement policy	<ul style="list-style-type: none"> <li>• Structural Impact Assessments are only required for Listed Buildings.</li> <li>• As part of criterion 2 of the policy, the applicant will need to demonstrate that the scheme safeguards the structural stability of the existing building, neighbouring buildings and other infrastructure; in some instances, this may require more detailed assessments of ground conditions in order to demonstrate that there will not be an unacceptable impact. As such, this is considered to be sufficiently addressed in the policy.</li> <li>• The Council cannot require evidence in relation to insurance policies – this is a civil matter and to be dealt with as part of the Party Wall etc. Act</li> </ul>

Ref No.	Name / Organisation	Summary of response received	Council's response
			<p>negotiations and agreements.</p> <ul style="list-style-type: none"> <li>• The policy, in its current wording, clearly resists basement development of more than one storey below the existing ground level to residential properties or those which were previously in residential use. This is considered to address point 4.</li> <li>• An additional criterion is to be added to address the concerns in relation to flood risk</li> <li>• The supporting text is also amended to set out that the Council strongly recommends for contractors undertaking basement construction to have membership of the Association of Specialist Underpinning Contractors (ASUC) or another suitable body, and to follow the ASUC 'Guidelines on safe and efficient basement construction directly below or near to existing structures'.</li> <li>• In addition, the Council will seek a charge to cover the costs of monitoring the Construction Management Statements.</li> </ul>
136	Richard Geary	Basements are vanity projects causing disturbance to neighbours; no research into long-term consequences to structure of neighbouring houses.	<ul style="list-style-type: none"> <li>• Comments noted. No change proposed. It is not the responsibility of the Council to carry out research into the long-term consequences to the structure of neighbouring houses, and this would be considered a non-Local Plan matter.</li> <li>• Note that the supporting text of the policy is amended to set out that the Council strongly recommends for contractors undertaking basement construction to have membership of the Association of Specialist Underpinning Contractors (ASUC) or another suitable body, and to follow the ASUC 'Guidelines on safe and efficient basement construction directly below or near to existing structures'.</li> <li>• In addition, the Council will seek a charge to cover the costs of monitoring the Construction Management Statements.</li> </ul>
137	Tim Catchpole, Planning Representative Mortlake with East Sheen Society	Add: "Evidence of engagement with neighbouring occupiers and evidence of no objection from them must be included as supporting information with the planning application".	<ul style="list-style-type: none"> <li>• Para 4.11.14 already deals with this matter. It should be noted that the Council cannot 'require' evidence of engagement; however, the existing supporting text states that 'Applicants wishing to undertake basement and subterranean developments are strongly advised to discuss their proposal with neighbours and other parties, who may be affected, by commencing Party Wall negotiations and discussing the scheme with the Council prior to the submission of a planning application.'</li> </ul>
138	Charles Pineles, Planning Spokesman, Richmond Society	If there is uncertainty around underground watercourses and future water flows cannot be ascertained, basement developments should be refused.	<ul style="list-style-type: none"> <li>• Basement developments can only be refused on planning grounds, where there is evidence of <i>demonstrable</i> harm.</li> <li>• An additional criterion is to be added to address the concerns in relation to flood risk</li> <li>• The supporting text is also amended to set out that the Council strongly recommends for contractors undertaking basement construction to have</li> </ul>

Ref No.	Name / Organisation	Summary of response received	Council's response
			<p>membership of the Association of Specialist Underpinning Contractors (ASUC) or another suitable body, and to follow the ASUC 'Guidelines on safe and efficient basement construction directly below or near to existing structures'.</p> <ul style="list-style-type: none"> <li>• In addition, the Council will seek a charge to cover the costs of monitoring the Construction Management Statements.</li> </ul>
139	Ben Mackworth-Praed, on behalf of the Barnes Community Association	There should be a presumption against all retro-fitted basements (at least in Barnes) as they are not part of traditional architecture, cause unnecessary distress to neighbours,, damage property, increase already excessive house prices, divert resources away from increasing housing stock and present unnecessary flood risk as well as adding to load on sewers.	<ul style="list-style-type: none"> <li>• Whilst it is acknowledged that basements are of concern and cause distress to neighbours, a policy that would prevent any basement developments within existing residential areas would not be supported by the Secretary of State and would be considered unreasonable.</li> <li>• An additional criterion is to be added to address the concerns in relation to flood risk</li> <li>• The supporting text is also amended to set out that the Council strongly recommends for contractors undertaking basement construction to have membership of the Association of Specialist Underpinning Contractors (ASUC) or another suitable body, and to follow the ASUC 'Guidelines on safe and efficient basement construction directly below or near to existing structures'.</li> <li>• In addition, the Council will seek a charge to cover the costs of monitoring the Construction Management Statements.</li> </ul>
140	Sarah Stevens, Turleys for British Land	Clarification needed that this relates to existing buildings where basements are introduced rather than new developments where basements are comprehensively planned and considered from the outset.	<ul style="list-style-type: none"> <li>• Part A of the policy states that 'basement development of more than one storey below the existing ground level to residential properties or those which were previously in residential use' – it is therefore clear that Part A applies to existing buildings only.</li> <li>• Part B of the policy applies to any basement developments. It is however acknowledged that larger development sites may not have any existing garden area, and as such some criteria wouldn't be applicable.</li> <li>• Paras 4.11.3 and 4.11.4 specifically relate to adding basements to existing residential properties.</li> <li>• Para 4.11.5 also refers to basements that may be more than one storey, and this could include more comprehensive redevelopment schemes. However, it is clear that some issues, such as in relation to noise, dust, vibration would apply to any basement development.</li> </ul>
141	Neil Henderson, Gerald Eve on behalf of Reselton Properties Ltd	Policy relates to existing residential properties. For avoidance of doubt, policy should be amended: "A. <u>In the context of existing residential properties</u> , the Council will resist subterranean and basement development of more than one storey below the existing ground level to existing residential properties or those which were previously in residential use."	<ul style="list-style-type: none"> <li>• Part A of the policy states that 'basement development of more than one storey below the existing ground level to residential properties or those which were previously in residential use' – it is therefore clear that Part A applies to existing buildings only.</li> <li>• Part B of the policy applies to any basement developments. It is however acknowledged that larger development sites may not have any existing garden area, and as such some criteria wouldn't be applicable.</li> </ul>

Ref No.	Name / Organisation	Summary of response received	Council's response
			<ul style="list-style-type: none"> <li>Paras 4.11.3 and 4.11.4 specifically relate to adding basements to existing residential properties.</li> <li>Para 4.11.5 also refers to basements that may be more than one storey, and this could include more comprehensive redevelopment schemes. However, it is clear that some issues, such as in relation to noise, dust, vibration would apply to any basement development.</li> </ul>
142	Celeste Giusti, Greater London Authority on behalf of Mayor of London	Support Could clarify that restricted uses include self-contained units and bedrooms	<ul style="list-style-type: none"> <li>Agreed, reference to be added to para 4.11.8</li> </ul>
<b>Chapter 5 – Green Infrastructure</b>			
143	Rachel Botcherby, Planning Advisor, London and South East National Trust	Support for policies LP12, LP13, LP14, LP15 and LP16	Noted
144	Richard Barnes, The Woodland Trust	Support for policies LP12, LP15 and LP 16	Noted
145	Mark Jopling, The Teddington Society and the Friends of Udney Park Playing Fields	Application for designation of Udney Park Playing fields as 'Local Green Space' Land is already designated as OOLTI and now also designated as Asset of Community Value, however, the latter does not provide the protection that the Local Green Space designation can provide.	<ul style="list-style-type: none"> <li>Change agreed.</li> <li>Agreed; designate Udney Park Playing Fields as 'Local Green Space' as this has been assessed as meeting the new Local Green Space policy requirements for designation.</li> <li>Amend the Green Belt / Metropolitan Open Land policy to cover in addition 'Local Green Space' (include new guidance within the policy as well as within the supporting text)</li> </ul>
<b>Policy LP 12 Green Infrastructure</b>			
146	Alice Roberts, CPRE London	Support LP12 and promotion of green infrastructure, including statement that housing need can be met without releasing open land and this is very much supported.	Noted
147	Janet Nuttall, Natural England	Policy should reference current recreational pressure on existing green infrastructure, including nationally and internationally designated areas such as Richmond Park SSSI, SAC, NNR and Bushy and Home Park SSSI. New residential development is likely to exacerbate this pressure hence the policy should require all new developments to mitigate this potential impact. Natural England has also published Accessible Natural Greenspace Standards (ANGSt) to support decision makers in planning for the provision of natural greenspace.	<ul style="list-style-type: none"> <li>Agreed in relation to the recreational pressure and wording is to be added to the supporting text of the Green Infrastructure policy.</li> <li>It is noted that Natural England has published Accessible Natural Greenspace Standards.</li> <li>See response to comment 489 below in relation to the Sustainability Appraisal.</li> </ul>

Ref No.	Name / Organisation	Summary of response received	Council's response
		SA should be informed by HRA to identify direct and indirect impacts. Where impacts are predicted, the SA should identify mitigation measures.	
148	Brian Willman, Chair Ham and Petersham Neighbourhood Forum	Support. Suggest including visual amenity as a main function in the Public Open Space Hierarchy. Need to include reference to gardens (as in existing policy). A list of the regional, metropolitan, district and local parks with their size and features would enhance this section.	<ul style="list-style-type: none"> <li>• Agreed to add references to visual amenity within the POS hierarchy.</li> <li>• 'Gardens' are still referred to in the hierarchy as within the existing policy, and therefore it is not clear what further additions should be made. Note that changes are made in relation to recognising the value of the historic parks and gardens – see response to comment 149 below.</li> <li>• The Council's <a href="#">Open Space Assessment</a>, carried out in 2015, provides a detailed assessment of the borough's open space provision including its condition, distribution and overall quality, covering parks and gardens, natural and semi-natural greenspaces, amenity greenspaces, play provision, allotments, cemeteries and civic spaces. It is therefore not considered necessary or appropriate to list all parks within the policy.</li> </ul>
149	Katharine Fletcher, Historic England	Highly significant historic landscapes on Historic England's national Register of Parks and Gardens, and other landscapes of strategic heritage interest, should be appropriately recognised and covered in this policy.	<ul style="list-style-type: none"> <li>• Agreed that reference to the importance of the historic parks and gardens and the exceptional landscape heritage is included.</li> </ul>
150	Tim Lennon, Borough Coordinator Richmond Cycling Campaign	New policy LP12 Green Infra - needs to include accessibility by bicycle, as well as cycle parking.	<ul style="list-style-type: none"> <li>• Cycling and walking is already referred to in para 5.1.3</li> <li>• This policy does not include accessibility criteria, but it should be noted that other policies in the Plan, including Policy LP 44 Sustainable Travel Choices as well as Policy LP 45 Parking Standards and Servicing include guidance on cycling including cycle parking provision.</li> <li>• For information, the Council is carrying out a public consultation on the borough's Cycling Strategy in the autumn of 2016: <a href="https://consultation.richmond.gov.uk/environment/cycling">https://consultation.richmond.gov.uk/environment/cycling</a></li> </ul>
151	James Togher, Environment Agency	Support references to the importance of green spaces to manage flood risk	Noted
152	Cllr Martin Elengorn, Environment Spokesperson Richmond upon Thames Liberal Democrat Councillors Group	5.1.9: Last line - replace "the" by "a"	<ul style="list-style-type: none"> <li>• Agreed</li> </ul>
		<b><i>Policy LP 13 Green Belt and Metropolitan Open Land</i></b>	
153	Alice Roberts, CPRE London	Need to state that Council will not seek to develop land in MOL for schools, including proposals involving the Education Funding Agency.	<ul style="list-style-type: none"> <li>• The policy includes a strong presumption against development in MOL unless very special circumstances in line with MOL/Green Belt policies can be demonstrated. As such, it is not considered necessary to specifically</li> </ul>

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			mention that schools or any other uses will not be developed in MOL.
154	Judith Livesey, NLP Planning on behalf of St Paul's School	<p>St Paul's School is undertaking significant redevelopment works following planning permission, including a total of 2,385 sqm footprint of inappropriate development and 1,500 sqm footprint of appropriate development in MOL. Policy makes no mention of NPPF exceptions and it is not clear whether policy reflects national policy.</p> <p>Policy is worded incorrectly as it implies that developments outside of MOL have an impact on openness; this would only be limited to visual impact.</p> <p>Support for paragraph 5.2.6 in relation to redistribution of open space in comprehensive development schemes (move this to main policy text), and include reference to educational uses.</p> <p>Need to review the MOL boundary in relation to the School as the land does not fulfil a strategic MOL function, and object to lack of wider MOL boundary review. St Paul's School boundary needs to be reviewed to address contradiction between current boundaries and what has been permitted, particularly as GLA stated that "The current uses of this land include a range of tarmac car parks, access roads and existing buildings. As such, these areas are not distinguishable from the built-up area, are not of a nature conservation or habitat value, and it could therefore be argued that the areas of land do not fulfil the function of MOL land... A case could be made for these areas to be de-designated as MOL through the Local Development Framework process. This approach is supported by London Plan policy and national guidance."</p> <p>Three main areas have been identified that do not meet the criteria for MOL designation:</p> <p>(1) car park and land to east of school  (2) area around Centenary building to east of main school  (3) area around Thames Water compound and 'bowl' car park</p> <p>Amendments to MOL boundary will reflect the grant of planning permission and the implemented realigned driveway. Areas sought for removal do not need MOL policy criteria.</p>	<ul style="list-style-type: none"> <li>• The policy states that paragraphs 79-92 of the NPPF on Green Belts applies equally to MOL. There is no need for local policies to repeat what is already within national policies, and as such it is not considered appropriate to repeat the NPPF exceptions within this policy.</li> <li>• It is not considered appropriate to mention particular land uses that may be able to meet the test relating to 'very special circumstances'. As such, the reference in para 5.2.6 to 'major schemes or regeneration proposals that deliver significant wider public benefits' suffices.</li> <li>• In relation to a borough-wide MOL boundary review, the Local Plan's Spatial Strategy states that the borough's parks and open spaces provide a green lung for south/west London. In addition, there is a presumption against the loss of, or building on, greenfield sites as well as MOL/Green Belt in this borough, unless very special circumstances and/or an exception to relevant policies can be demonstrated. In addition, the Plan demonstrates that the Borough can meet its housing needs without releasing open land that is protected by designations such as Green Belt or MOL. Therefore, a borough-wide Green Belt or MOL review is not undertaken as part of this Local Plan.</li> <li>• Whilst we note the reasons and justification brought forward by the respondent to review the MOL boundary at St Paul's School, as stated above, MOL boundaries are not being reviewed as part of this Local Plan. It is also noted that the school already benefits from various planning permissions and as such, this clearly demonstrates that the MOL policy allows for very exceptional circumstances to be met where those are put forward by the applicant. The Council is also of the opinion that the granting of planning permission under very exceptional circumstances in MOL is not a trigger for a need to review the MOL boundary.</li> </ul>
155	Ms Unity Harvey	Omission in relation to Barn Elms and Rocks Lane, including any floodlighting on the Wandsworth Sports Centre. Detailed comments in relation to Barn Elms regarding fencing, no proliferation of shipping containers and scattered advertisements.	<ul style="list-style-type: none"> <li>• These matters are considered as part of assessing any potential impacts of development proposals on the openness and character of designated MOL.</li> <li>• Note that there is a separate floodlighting policy within the Local Plan, which would apply to any proposals for floodlighting in the borough.</li> </ul>
156	Tim Sturgess, Bilfinger GVA on behalf of The Lady Eleanor Holles School	Lady Eleanor Holles School seeks expansion of school to meet current and projected future unmet local demand, including new pre-prep facility. Conflict of MOL designation with education policy. The school is currently unable to provide a new pre-prep facility within the existing parts of the site which are excluded from the MOL.	<ul style="list-style-type: none"> <li>• Whilst we note the reasons and justification brought forward by the respondent to review the MOL boundary, the Council has already discussed with the school and their agent that MOL boundaries are not being reviewed as part of this Local Plan.</li> <li>• It should be noted that not the entire site occupied by the Lady Eleanor</li> </ul>

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		The submission and appendices demonstrate that exceptional circumstances exist in relation to the principle of expanding the school.	<p>Holles School is designated MOL – there is a substantial area in the middle of the site, which contains the existing school buildings including some adjoining open land (to the north east), which is not designated MOL. As such, there is significant scope for a comprehensive approach to redevelopment and/or expansion, without encroaching into protected MOL. The policy also recognises that where a comprehensive approach to redevelopment can be taken, such as on major schemes or regeneration proposals that deliver significant wider public benefits, it may be acceptable to re-distribute the designated open land within the site, provided that the new open area is equivalent or improved in terms of quantum, quality and openness. The applicant will need to demonstrate this as part of the argument to justify that ‘very special circumstances’ may exist.</p> <ul style="list-style-type: none"> <li>• Therefore, if the School wants to propose development or extensions within designated MOL, this should be assessed as part of a planning application; any such application would be assessed against MOL policies, including the NPPF policy on Green Belt, which allow for some exceptions to be made if the proposals are for small-scale extensions; if the proposal would be contrary to policy, an applicant would have to demonstrate that ‘very special circumstances’ exist that may justify this development in MOL, or demonstrate that an exception to MOL policy is required. The Council would give substantial weight to any harm to MOL and ‘very special circumstances’ would not exist unless the potential harm is clearly outweighed by other considerations.</li> </ul>
157	Savills on behalf of Thames Water	Hampton Water Treatment Works should continue to be identified as ‘Major Developed Site’ in the Green Belt. It will be inevitable that further upgrades will be required over the plan period to increase capacity required to service new development identified in the Local Plan or meet new standards.	<ul style="list-style-type: none"> <li>• The designation of ‘Major Developed Site’ in the Green Belt was discontinued when PPG 2 (Green Belt) was superseded by the NPPF. The NPPF policy in relation to Green Belt as well as the local policy on MOL/Green Belt allow for exceptions to be made to Green Belt policies. In particular, ‘essential utility infrastructure’ is referred to within the local policy. No change.</li> </ul>
158	Brian Willman, Chair Ham and Petersham Neighbourhood Forum	LP 13 B1 ‘..development may be acceptable if it does not harm character, openness and... ’ We suggest adding visual amenity here.	<ul style="list-style-type: none"> <li>• Visual amenity is not a specific criterion of the London Plan policy on MOL. It is considered that an assessment of any proposal against potential harm to the ‘openness’ of the MOL sufficiently addresses the London Plan criterion in relation to the contribution of the MOL to the physical structure of London by being clearly distinguishable from the built up area, and thus also includes to some extent visual amenity.</li> <li>• Also note that the policy specifically refers to encouraging measures to reduce visual impacts where appropriate</li> </ul>
159	Peter Willan, Old Deer Park	Recommend the following in the interests of clarity and certainty: ‘Development will <u>only</u> be supported if it is appropriate and <u>contributes to preserving and/or</u>	<ul style="list-style-type: none"> <li>• The Council considers it too onerous to require development proposals to contribute to preserving and/or enhancing the Green Belt/MOL. This</li> </ul>

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	Working Group	<u>enhancing that part of the Green Belt or Metropolitan Open Land to which it directly relates.</u>	criterion has never been part of the MOL policy, and usually this is applied to developments in Conservation Areas. Adding this additional criterion would be seen as not being in line with London Plan and NPPF policy and guidance, as such, no change is proposed.
160	Celeste Giusti, Greater London Authority on behalf of Mayor of London	Support, but Mayor is cautious with regard to the potential comprehensive redevelopment of any Green Belt or MOL, as set out in proposed paragraph 5.2.6, where the Green Belt or MOL still perform their functions as set out in the NPPF and the London Plan.	<ul style="list-style-type: none"> <li>Noted. If a comprehensive approach to redevelopment may be taken for a particular scheme, this will need to be justified in line with the NPPF policy on 'very special circumstances'. As part of this, it is expected that the applicant would submit a statement that addresses how the land performs the functions as set out in the NPPF and London Plan.</li> </ul>
161	Celeste Giusti, Greater London Authority on behalf of Mayor of London	The Mayor would not generally be supportive of the allocation of open spaces, including the Green Belt and Metropolitan Open Land for the development of schools.	<ul style="list-style-type: none"> <li>The policy includes a strong presumption against development in MOL unless very special circumstances in line with MOL/Green Belt policies can be demonstrated. The development of schools in MOL is not referred to in this policy.</li> </ul>
162	David Taylor	<p>Support, but acknowledge that there are pockets of land caught in Green Belt designation despite being de-facto Brownfield land, fenced-off with buildings and land used and scarred by long-term industrial use, currently offering little or no biodiversity. Such pockets of Brownfield Land should, exceptionally, be considered for residential development.</p> <p>Local Plan sets aggressive new house building targets, and an exception to policy, where it is demonstrably brownfield in GB/MOL, could help make targets more achievable.</p> <p>An example of pockets of brownfield land caught by GB purely for historic zoning is the pocket of LBRuT land that was owned by Thames Water as part of operational land for Sunnyside reservoirs – this has zero biodiversity, has long been fenced-off and is redundant and derelict as well as vulnerable to fly-tipping.</p> <p>Ensure policy is consistent with and supportive with Local Plan's overriding spatial strategy for brownfield land development.</p>	<ul style="list-style-type: none"> <li>It should be noted that there is a presumption against the loss of, or building on, greenfield sites as well as MOL/Green Belt in this borough, unless very special circumstances and/or an exception to relevant policies can be demonstrated. Therefore, the strategy is clear in terms of prioritising and developing on brownfield land.</li> <li>No borough-wide Green Belt or MOL boundary review is undertaken as part of this Local Plan as the Spatial Strategy demonstrates that the Council can meet its strategic housing target without using greenfield sites.</li> </ul>
163	Cllr Martin Elengorn, Environment Spokesperson Richmond upon Thames Liberal Democrat Councillors Group	Policy LP 13 para 5.2.1: 3rd sentence - delete and replace by "Land acquired under the Green Belt (London and Home Counties) Act 1938 may or may not be Green Belt."	<ul style="list-style-type: none"> <li>It should be noted that this was an error and the position as stated in the preceding text box on 'What the evidence says' should have applied. For clarification, although land comprising Twickenham and Fulwell golf courses is held under The Green Belt (London and Home Counties) Act, 1938, it is not covered in this Local Plan by a Green Belt designation in the terms described by national guidance. Notwithstanding the Council's decision not to designate land at Twickenham and Fulwell golf courses as Green Belt, it is emphasised that this land is designated as Metropolitan Open Land, and therefore the same policy framework applies. A Green Belt designation would therefore not add any additional protection to this land.</li> </ul>
		<b>Policy LP 14 Other Open Land of Townscape Importance</b>	

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164	George Burgess, Indigo Planning on behalf of Beechcroft Developments Ltd	<p>Object to designation of St Michael's Convent gardens as OOLTI due to lack of evidence produced by Council to support this. 2006 Allen Pyke study on open land designations in the borough did not identify this site. It should have been introduced at the DMP stage in 2011. Proposed OOLTI designation covers area part of the domestic amenities of main building; difficult to get views into the site and not visible in general views from Ham Common.</p> <p>Amend para5.3.4 as follows: "note that the criteria are qualitative and not all need to be met" as this undermines the value of the OOLTI policy, making g it open-ended.</p>	<p>It is noted that the respondent is not acknowledging the value of the gardens to the townscape and local people, and simply objecting to the designation in principle rather than putting forward any alternative OOLTI boundary. The Council considers that the gardens of St Michael's Convent meet the criteria for OOLTI designation; taking each criterion in turn:</p> <ul style="list-style-type: none"> <li>• Contribution to the local character and/or street scene, by virtue of its size, position and quality – The area covered by these gardens is of significant size and not only contributes to, but largely defines the local character of this part of Ham Common. The site is valued by local people as evidenced by its recommendation for OOLTI protection by local Councillors and a large number of local residents. In addition, the designation of the gardens as OOLTI will also contribute to preserving and/or enhancing the setting of the Listed Building.</li> <li>• Value to local people for its presence and openness – The substantial local support received for the designation of this site as OOLTI demonstrates that the gardens are of value to local people for its presence and openness. It should be noted that the Council has first published its intention to designate the gardens as OOLTI in August 2014, and strong local community support has been received ever since then. Immediate or longer views into and out of the site, including from surrounding properties. – this is particularly relevant for the residents of Martingales Close, because its houses are on one side of the road only, the other side adjoining the Convent garden.</li> <li>• Contribution to a network of green spaces and green infrastructure as set out in policy LP12 in 5.1 'Green Infrastructure' – The garden lies in the Great South Avenue of Ham House, at the heart of the wildlife corridor. The gardens provide an important link as part of the green corridor in Ham, which runs between Richmond Park to the River Thames via Ham Common, St Michael's Convent and Avenue Lodge gardens, Grey Court School playing fields, Ham House avenues and gardens, and the Ham Lands.</li> <li>• Value for biodiversity and nature conservation – The Council proposes to designate the gardens as Other Site of Nature Importance as part of the Local Plan due to its great environmental importance and biodiversity value. For information, the Council employed an independent contractor to survey the site, and in cooperation with the Richmond Biodiversity Partnership, the gardens are to be designated as Other Site of Nature Importance (OSNI).</li> <li>• For the reasons set out above, the Council considers that this site meets all the criteria for OOLTI and can be soundly designated as such.</li> </ul>

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			Whilst it is acknowledged that the 2006 review into the borough's open spaces did not include this site, this does not mean that the Council cannot consider further open land designations as part of its Local Plan review. In summary, the Council is not proposing to amend the OOLTI criteria for designation, which were discussed in great detail at the 2011 DMP examination in public. No change proposed.
165	Geoff Bond, Chair Ham and Petersham Association	Support	Noted
166	Sam Hobson, Quantum Group	Owners of Udney Park Playing Fields, completed acquisition in September 2015. Amend / add new criterion c as follows: 'or it forms part of comprehensive proposals for community and social infrastructure that results in new, or improved provision of and quality of facilities, and improves on the usability and accessibility of the open land and its facilities by the general public'. Previous criterion c then becomes criterion d. Also add 'For criterion d. evidence of "material harm" will be considered where more than 12.5% of the designated open land is proposed to be lost to development.' Plans for Udney Park: open up the majority of the site for public access to be used for sport and recreation and develop approximately one third of the land as a Continuing Care Retirement Community (retirement/extra care/care home accommodation) that may include health care and other community uses for the wider community.	<ul style="list-style-type: none"> <li>See response to comment 145 above as well as 475 and 477 below, which confirm that the site will not be allocated for residential / extra care use or any other built development. Instead, the land will be designated as Local Green Space.</li> </ul>
167	Tim Catchpole, Planning Representative Mortlake with East Sheen Society	Support	Noted
168	Peter Willan, Old Deer Park Working Group	Amend to 'Other open land of townscape <u>and landscape</u> importance'	<ul style="list-style-type: none"> <li>OOLTI has been a long-standing designation and policy in this borough and it is therefore not proposed to change this.</li> </ul>
		<b>Policy LP 15 Biodiversity</b>	
169	Janet Nuttall, Natural England	Support for policy, but strengthen requirements for all development to deliver net gain for biodiversity, through incorporation of ecological enhancements,	<ul style="list-style-type: none"> <li>A new requirement for major developments to deliver net gain for biodiversity has been included within the policy</li> </ul>

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		<p>wherever possible.</p> <p>If SA predicts direct and indirect impacts such as through increased recreational pressure, then the SA should identify mitigation measures and policy LP 15 should be amended in accordance with SA findings.</p>	
170	Brian Willman, Chair Ham and Petersham Neighbourhood Forum	<p>Add in A: "The Council will protect, enhance <b>and manage</b> the borough's biodiversity...."</p> <p>Lack of resources and management has degraded existing sites and reduced their biodiversity. Resourcing the BAP should be a policy commitment.</p>	<ul style="list-style-type: none"> <li>• Whilst it is acknowledged that there may be lack of resources to manage the commitments of the BAP, this is not a Local Plan matter and it is not appropriate for a Local Plan policy to stipulate what resources the Council will make available for managing biodiversity.</li> </ul>
171	James Togher, Environment Agency	<p>Support for policy and add additional point:</p> <p>"Seek opportunities and identify projects to integrate flood risk management and climate change actions into improving river corridors and increasing the amount and quality of green infrastructure across the borough"</p>	<ul style="list-style-type: none"> <li>• It is considered that flood risk management and climate change projects, including opportunities to improve river corridors and increasing the amount and quality of the green infrastructure network is already sufficiently covered in other policies of the Plan.</li> </ul>
		<b>Policy LP 16 Trees and Landscape</b>	
172	Richard Barnes, The Woodland Trust	<p>Need for explicit reference to retain existing woodland, veteran/ancient trees and enhance tree canopy cover in the borough: 'The Council will not permit any development proposal which would result in the loss or deterioration of irreplaceable habitat such as ancient woodland and the loss of aged or veteran trees found outside ancient woodland, unless the need for, and benefit of, the development in that location is wholly exceptional'.</p> <p>Need to recognise historical, cultural and wildlife role of ancient trees as well as good management of ancient trees.</p> <p>A new sentence could be added to paragraph 5.4.6 or 5.4.7: "Guidance on the retention and planting of trees in new development can be found in the report Residential Development and Trees published by the Woodland Trust."</p> <p>Wealth of evidence on accessible woodland and high canopy cover, including mental health, air quality, water quality, water management, shading, cooling and biodiversity.</p> <p>Cross-reference needed to the benefits of trees and green infrastructure within Housing chapter. The Woodland Trust's Woodland Access Standard recommends:</p> <ul style="list-style-type: none"> <li>- that no person should live more than 500m from at least one area of accessible woodland of no less than 2ha in size</li> <li>- that there should also be at least one area of accessible woodland of no less than 20ha within 4km (8km round-trip) of people's homes.</li> </ul> <p>Although Richmond has more access to both a 20ha woodland within 4km and a 2ha woodland within 500m than the London average, Richmond still has a low figure for the latter.</p> <p>Space for People and the WAsT should be used to justify the provision of new small woodland in large-scale developments.</p>	<ul style="list-style-type: none"> <li>• Agreed to include explicit reference to woodlands and veteran/ancient trees</li> <li>• Include reference to the Woodland Trust guidance</li> <li>• Due to the nature of this borough and the fact that the majority of development sites are relatively small scale, it is not considered appropriate to include requirements for the provision of new small woodland in developments. On a similar token, whilst it is acknowledged that the Woodland Trust has produced the Woodland Access Standards, it is not considered that this is appropriate for inclusion in a Local Plan for a London borough.</li> <li>• Reference to woodlands has been included in para 5.1.2 relating to Green Infrastructure and para 6.1.7 in relation to climate change adaptation and urban greening</li> </ul>

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		Woodland Trust would like to see trees and woodland, which have been proven to have a significant effect on flood amelioration, more explicitly acknowledged accordingly in your new Local Plan for Richmond, in the section on Green Infrastructure (paragraph 5.1.5) and/or in Section 6.2 "Flood Risk and Sustainable Drainage". Trees should be acknowledged in section 6.1 Climate Change Adaptation to help combat climate change. Reference Trees and Design Action Group guidance, and the Woodland Trust's Residential Development and Trees report.	
173	Brian Willman, Chair Ham and Petersham Neighbourhood Forum	Add to 4 New trees - <b>trees which will in the future be of townscape or amenity value are encouraged where appropriate.</b> New developments need to provide space for new trees to mature.	<ul style="list-style-type: none"> <li>Agreed. A reference to the need to account of space required for trees to mature is included.</li> </ul>
174	Cllr Martin Elengorn, Environment Spokesperson Richmond upon Thames Liberal Democrat Councillors Group	Policy LP 16: In line 3 replace "compliment" by "complement". At end add "Fruit trees will be encouraged." 5.5.1 Carbon dioxide is a greenhouse gas not a pollutant. In line 8 substitute "reduce levels of carbon dioxide and airborne pollutants such as nitrogen dioxide....."	<ul style="list-style-type: none"> <li>Agreed to amend 'compliment'</li> <li>Criterion 4 already refers to native species, and fruit trees, where appropriate, would be considered as part of native species</li> <li>Agree to amend reference to airborne pollutants and carbon dioxide</li> </ul>
175	Neil Henderson, Gerald Eve on behalf of Reselton Properties Ltd	Part 2 of the draft Policy allows no flexibility for instances where works are required to existing trees which contribute to the local landscape. Need to recognise that some developments may require removal of trees that are considered to be of townscape or amenity value where this results in significantly greater planning benefits. Amend part 2 as follows: "resist development which results in the damage or loss of trees that are considered to be of townscape or amenity value, <u>unless clear planning benefits can be demonstrated...</u> "	<ul style="list-style-type: none"> <li>It is acknowledged that some flexibility may be required in special circumstances; however, this will need to be assessed on a case by case basis.</li> </ul>
		<b><i>Policy LP 17 Green Roofs and Walls</i></b>	
176	Brian Willman, Chair Ham and Petersham Neighbourhood Forum	Support	Noted
177	Cllr Martin Elengorn, Environment	Policy LP 17: Add at end "whether or not it is part of local character".	<ul style="list-style-type: none"> <li>The policy already states that the use of green roofs and walls are encouraged and supported in smaller developments, renovations, conversions and extensions. It is therefore irrelevant and not necessary to</li> </ul>

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	Spokesperson Richmond upon Thames Liberal Democrat Councillors Group		state 'whether or not it is part of local character'.
178	Sarah Stevens, Turleys for British Land	Policy should include brown roofs to provide clarity (currently only in supporting text)	<ul style="list-style-type: none"> <li>Agreed. References to brown roofs to be incorporated.</li> </ul>
179	Neil Henderson, Gerald Eve on behalf of Reselton Properties Ltd	<p>Target of using at least 70% of roof plate areas as green roofs is onerous, but welcome flexibility that is incorporated. Where applicants cannot provide green roofs, the draft Policy states that the Council will normally expect a green wall to be incorporated. Need to recognise that green walls are not always suitable (e.g. orientation) and may not always provide sustainable and ecological benefits; they can be expensive to maintain.</p> <p>Amend as follows: The Council will normally expect <u>other sustainable design methods to enhance biodiversity and provide sustainability benefits</u> a green wall to be incorporated where it has been demonstrated that a green roof is not feasible."</p> <p>Missing opportunity for green roofs to act as roof terraces. Amend supporting text to reflect that green roofs provide the opportunity to act as roof terraces.</p>	<ul style="list-style-type: none"> <li>It is acknowledged that a green wall may not always be suitable, therefore, a reference to 'where appropriate' is included</li> <li>Whilst there may be circumstances where a green roof could act as a roof terrace, in general, roof terraces are likely to cause issues in relation to amenity, privacy and visual intrusion. Therefore, any such proposals would need to be considered on a case by case basis.</li> </ul>
		<b>Policy LP 18 River Corridors</b>	
180	Rob Gray, Friends of the River Crane Environment (FORCE)	<p>Object to removal of CP12 and Lower Crane Area of Opportunity, both of which have been successful policies for delivering improvements in the Crane valley. Richmond College site and Twickenham station are still being developed; potential new developments at Harlequins and Depot; some other sites are nearby including Greggs, RFU, Mereway Day Centre – there is a need to continue the operation of the SPG and CP 12.</p> <p>Widen opportunity area to include Greggs, Mereway Day Centre and the RFU sites.</p> <p>Include river restoration for the lower Crane as in existing policy.</p> <p>Note that accessible riverside open space between Hounslow Heath and Twickenham Station is now largely realised.</p> <p>There has been progress and public engagement downstream of Twickenham Station, linking with Friends of Moormead to achieve the aim of including the tidal reaches of the river to the River Thames.</p> <p>Considerable benefits and investments along Lower Duke of Northumberland's River – need to reflect the importance of this corridor.</p> <p>Add to objective 4 "education and learning, health and well-being, and social cohesion" as there are wider benefits.</p>	<ul style="list-style-type: none"> <li>The Council has considered the issue of removing a separate policy for the River Crane very carefully. It has come to the conclusion that there should be one overarching policy for all the borough's river corridors. It would not be appropriate to include a policy for the Crane, the DNR, the Thames, the Beverley Brook etc.</li> <li>The Council also considers it prudent to remove the 'Area of Opportunity' designation, which would imply within the London context an area for development (i.e. housing) opportunity.</li> <li>However, it is acknowledged that the River Crane corridor policy has been successfully applied over the years, and that development sites are still underway. Whilst the Council is continuing with the removal of the Opportunity area, the particular development sites that are considered to be within the River Crane and DNR corridor (i.e. Richmond College, Twickenham Station, Greggs bakery, The Stoop, Twickenham Stadium, the Depot and Mereway Day Centre) are now specifically listed in the supporting text. Therefore, these development sites are expected to continue making contributions to improving the river corridor.</li> <li>It is also proposed to retain the SPG and any references to statements that</li> </ul>

Ref No.	Name / Organisation	Summary of response received	Council's response
			<p>the SPG has now largely fulfilled its role are to be removed.</p> <ul style="list-style-type: none"> <li>• In relation to river restoration, the policy already stipulates that developments should contribute to improvements and enhancements to the river environment. Other specific projects, such as river restoration projects, are not matters for the Local Plan, and would likely be delivered in partnership with other bodies such as the Environment Agency, and community groups such as FORCE.</li> </ul>
181	Lucy Owen, Port of London Authority	<p>Need to provide evidence base that supports providing new public access to the foreshore, as there are health and safety issues associated with accessing the foreshore such as rapidly rising tides and biodiversity implications. PLA is supportive of access along the Riverside being protected and improved it objects to unrestricted access to the foreshore. Council should seek for all development proposals adjacent to rivers to provide riparian life saving equipment (grab chains, access landers and life buoys). Policy should set out its support for riverside development and seek to utilise the river for the transport of construction and waste materials wherever practicable.</p>	<ul style="list-style-type: none"> <li>• The Council will take health and safety reasons into account as and when appropriate. This will be assessed on a site by site basis.</li> <li>• A new criterion is added to require riparian life-saving equipment.</li> <li>• The requirement to utilise the river for the transport of construction materials and waste is included in the Waste Management policy of this Plan</li> </ul>
182	Kevin Scott, Kevin Scott Consultancy Ltd on behalf of Port Hampton Estates Limited	<p>Support principle of policy, but sometimes suite or ownership issues would prevent achieving access; amend B (c) as follows: ‘...There is an expectation that all major development proposals adjacent to the borough's rivers shall provide public access to the riverside and foreshore <u>unless site specific characteristics would prevent this.</u>’</p> <p>Policy needs to reflect that retention of uses may no longer be viable or appropriate; amend point 1 as follows: “resisting redevelopment of existing river-dependent or river-related industrial and business uses to non-river related employment uses or residential uses <u>unless the applicant can make a case that the retention of such uses is unviable</u>”</p>	<ul style="list-style-type: none"> <li>• Whilst the Council would take into account site specific characteristics and circumstances, these would be assessed on a case by case basis. It is in fact the Council's view that the onus should be on the developer to work with adjoining landowners, where necessary, to gain public access to the riverside, where this is not yet available, and ensure that proposals provide wider public benefits, especially benefits to the local community.</li> <li>• It is acknowledged that that there may be special circumstances where no river-related or river-dependent use is feasible or viable, and a reference is included in this regard.</li> </ul>
183	Ben Mackworth-Praed, on behalf of the Barnes Community Association	<p>P.84 5.7.8: What is "inclusive access?"</p> <p>P.84 5.7.11: Add at end: "Where use of the riverside path is shared priority shall be given to pedestrians."</p>	<ul style="list-style-type: none"> <li>• Inclusive access implies access for all users, regardless of disability, age etc.</li> <li>• It is not a matter for the Local Plan to set out who has priority on the riverside path.</li> </ul>
184	Katharine Fletcher, Historic England	Support	Noted
185	Charles Pineles, Planning Spokesman, Richmond Society	<p>Concern about balance of uses in high footfall areas, such as Richmond Riverside, and in relation to health and safety and waste handling practices in areas where work is carried out, or the area is used to stock of work in progress. Consider appropriate restrictions for pedestrian access in such limited areas.</p>	<ul style="list-style-type: none"> <li>• The Council will take health and safety reasons into account as and when appropriate. This will be assessed on a site by site basis.</li> </ul>

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186	Neil Henderson, Gerald Eve on behalf of Reselton Properties Ltd	<p>Part C of draft Policy LP 18 is overly onerous and does not take into account any land ownership or flood defence issues that may limit the ability to provide a public riverside walk; amend as follows: "All development proposals adjoining the River Thames are required to provide a public riverside walk <u>where feasible,...</u>"</p> <p>Part D Sections 2 and 3 of the draft Policy should acknowledge that riverside sites can present opportunities to deliver uses which are not river-dependent and which deliver significant planning benefits; amend as follows: "2. <u>Where appropriate</u>, ensuring development on sites along the river..." and amend "3. requiring an assessment of the effect of the proposed development of the operation of existing river-dependent uses or riverside gardens on the site and their associated facilities on- and off-site; or <u>where appropriate</u> requiring an assessment of the potential of the site for river-dependent uses and facilities if there are none existing;"</p>	<ul style="list-style-type: none"> <li>• Whilst the Council would take into account site specific characteristics and circumstances, these would be assessed on a case by case basis. It is in fact the Council's view that the onus should be on the developer to work with adjoining landowners, where necessary, to gain public access to the riverside, where this is not yet available, and ensure that proposals provide wider public benefits, especially benefits to the local community.</li> <li>• It is acknowledged that there may be special circumstances where no river-related or river-dependent use is feasible or viable, and a reference is included in this regard.</li> </ul>
187	James Togher, Environment Agency	Support policy, including 16 m buffer zone to tidal Thames and 8 m on all other rivers, setting back developments, restricting non-river-related uses and resisting loss of existing river-dependent and river-related uses, including wharves, boat building sheds	Noted
188	William Mortimer	Regrettable that Stag Brewery site loses an important part of history (i.e. delivering raw material necessary to brewing by river); a catamaran service would serve to maintain the contact between community and river for the future.	<ul style="list-style-type: none"> <li>• A link through the site including public access to the riverside is included in the site allocation for the Stag Brewery. There is also an expectation for river-related uses as well as sport and leisure uses,</li> </ul>
		<b>Policy LP 19 Moorings and Floating Structures</b>	
189	Lucy Owen, Port of London Authority	Section 5.8 states that definitions are needed for houseboats, residential moorings, temporary and permanent moorings, but these are not included. Given the number of houseboats within Richmond and elsewhere on the River Thames it is questioned whether houseboats, by definition are an inappropriate use within Metropolitan Open Land. It is also questioned how they cause problems because of infrastructure provision that are any different to for example a new housing development on the land which also requires sewage, waste, water, secure storage and washing etc. Need to review evidence base.	<ul style="list-style-type: none"> <li>• Whilst it was previously acknowledged that there should be definitions for houseboats and various types of moorings, there is no established and agreed definition within the planning system.</li> <li>• Houseboats, which are used for residential purposes, are by definition inappropriate uses within MOL (please refer to the MOL policy on what constitutes appropriate land uses in MOL). They are fundamentally different to conventional housing development, which usually takes place on brownfield land rather than on the river, which is designated MOL.</li> <li>• It should be noted that the London Borough of Richmond upon Thames has been experiencing numerous problems over sustained periods with boats mooring without permission along the banks of the River Thames. Therefore, the Council has introduced a new byelaw to suppress the nuisances and ensure that boat owners stop mooring their boats along land belonging to the Council. As such, this policy supports the byelaw that is already in place.</li> </ul>
190	Kevin Scott, Kevin Scott	The purpose or meaning of "wider benefit to the community" in this policy is meaningless and difficult to quantify. Other three criteria provide sufficient	<ul style="list-style-type: none"> <li>• Whilst it is noted that the respondent thinks that the 3 criteria provide sufficient control, the Council wishes to retain criterion 4 to ensure</li> </ul>

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	Consultancy Ltd on behalf of Port Hampton Estates Limited	control over the provision of such structures in the river. Delete criterion 4.	moorings and other floating structures are of wider benefit to the local community, such as for example providing mooring for pleasure craft and enjoyment of the river.
<b>Chapter 6 – Climate Change and Sustainable Design</b>			
191	Tim Catchpole, Planning Representative Mortlake with East Sheen Society	Need to address duplication in this chapter with other sections of the Plan, e.g. basements are already in Chapter 4.	<ul style="list-style-type: none"> <li>Noted. There is a need for specific basement guidance within flood risk areas because basements within flood affected areas of the borough represent a particularly high risk to life, and it is essential that careful consideration is given to their design and use.</li> </ul>
<b>Policy LP 20 Climate Change Adaptation</b>			
192	William Mortimer	Need for disaster management plan to complete the concept of addressing global climate change	<ul style="list-style-type: none"> <li>Comments and concerns in relation to emergency and disaster management are noted. One of the duties imposed upon Local Authorities under the Civil Contingencies Act (2004) is to assess the risk of an emergency occurring within or affecting their geographical area. This duty is discharged at the Local Resilience Forum (LRF) level and is a collaborative evaluation of risk used to inform emergency planning, business continuity and warning and informing the public.</li> <li>The Council has a lot of information published on its public website in relation to accidents and emergencies: <a href="http://www.richmond.gov.uk/accidents_emergencies_and_safety.htm">www.richmond.gov.uk/accidents_emergencies_and_safety.htm</a></li> <li>The Council has specific advice, guidance and plans in place to deal with emergencies, such as flooding. There is also advice and guidance on how to prepare for an emergency, what to do if you are involved in an emergency, how to get information, coping emotionally and general evacuation advice.</li> <li>If you would like to discuss this further, please contact the Council's Emergency Planning Officer at: <a href="mailto:emergency.planning@richmond.gov.uk">emergency.planning@richmond.gov.uk</a></li> </ul>
193	Savills on behalf of Thames Water	Support for policy and water conservation as well as efficient use of water and the references in paras 6.3.3 to 6.3.6, but there should be clearer reference in Policy LP 23 itself. Water consumption target of 110 l/p/d should be covered in main policy LP 20 and 23. Policy could make reference to Thames Water guidance. Managing demand alone will not be sufficient to meet increasing demand and Thames Water adopt the Government's twin-track approach of managing demand for water and, where necessary, developing new sources, as reflected in the latest Thames Water Water Resource Management Plan.	<ul style="list-style-type: none"> <li>It should be noted that LP20 is the overarching climate change adaptation policy, with LP22 setting out the specific sustainable construction standards to be followed in developments. As such, it is not considered appropriate to repeat the specific water consumption targets in both policies. Note that para 6.1.2 refers to the fact that managing and saving water resources and other aspects of climate change adaptation are dealt with in in separate and more detailed policies within this Plan. A reference to water conservation and water consumption targets will be included in para 6.1.2.</li> </ul>
194	Ben Mackworth-	P.90 6.1.6 Add at end: "and will be discouraged/forbidden."	<ul style="list-style-type: none"> <li>Noted. Air conditioning systems are already at the bottom of the cooling hierarchy as set out in policy LP 20, and therefore the policy encourages</li> </ul>

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	Praed, on behalf of the Barnes Community Association		other measures to be considered and implemented first, with an active cooling system being the least preferred option. No change.
		<b>Policy LP 21 Flood Risk and Sustainable Drainage Sustainable Drainage</b>	
195	Brian Willman, Chair Ham and Petersham Neighbourhood Forum	SuDS should be a requirement (rather than encouraged) in all new development	<ul style="list-style-type: none"> <li>Agreed. A change is proposed in this regard.</li> </ul>
196	Charles Pineles, Planning Spokesman, Richmond Society	Support for policy LP 21 A: Subterranean Developments under 4, we welcome the intention that unacceptable developments will be refused and most especially such as relate to basements under B; not only loss of life that is concern, but displacement of water in previously drained areas, especially with high water table that may threaten to destabilise buildings	<ul style="list-style-type: none"> <li>This is a matter considered to be too detailed for a local planning policy. It should be acknowledged that it is difficult to predict whether a development proposal could displace water in a previously drained area. However, where there is evidence that there could be demonstrable harm to neighbouring buildings or properties, this would need to be assessed as part of a site-specific Flood Risk Assessment. For information, Flood Risk Assessments specific to a particular development site must demonstrate that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall. The scale of the assessment within the FRA needs to be commensurate with the nature of the proposed development.</li> </ul>
197	Savills on behalf of Thames Water	Support for policy Basements and sewage flooding remains a main concern. By virtue of their low lying nature basements are vulnerable to many types of flooding and in particular sewer flooding. Policy should therefore require all new basements to be protected from sewer flooding through the installation of a suitable (positively) pumped device, in proposals where there is a waste outlet (e.g. toilets, bathrooms, utility rooms). Location of pumped device should be shown in drawings submitted with planning application. Need to recognise that water and/or sewerage infrastructure may be required to be developed in flood risk areas.	<ul style="list-style-type: none"> <li>Agreed. Add reference to the requirement for pumped devices where required.</li> <li>The NPPF/PPG policies and guidance will be applied should there be a requirement for water and/or sewerage infrastructure proposals to be located within flood risk areas. There is therefore no need to specifically refer to this in the local policy.</li> </ul>
198	Sarah Stevens, Turleys for British Land	Include definition for 'floodplain compensation' to distinguish between fluvial and surface water flooding. Part C: The difference between a 'brown field' site and a 'green field' site needs to be acknowledged in this policy and/or supporting text. DEFRA's 'Sustainable Drainage Systems: Non-statutory technical standards for sustainable drainage systems' (March 2015) sets out non-statutory technical standards for sustainable drainage systems and should be used in this policy. Policy requirements (i.e. achieve greenfield runoff rates and if not feasible,	<ul style="list-style-type: none"> <li>Floodplain compensation and how this will be applied, including definitions, are matters considered to be too detailed for the Local Plan and should therefore be addressed in Environment Agency and/or other guidance, such as the Council's Strategic Flood Risk Assessment (SFRA).</li> <li>In relation to sustainable drainage requirements for brownfield and greenfield sites, policy LP 22, part C, sets out that a reduction in surface water discharge to greenfield run-off rates will be sought wherever feasible. This policy is considered to be flexible, because it also states that</li> </ul>

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		reduce it to existing runoff rates by 50%) is more onerous than National Standards and would lead to greater flood storage requirements. Paragraph 6.2.4 needs to cross refer to the peak flow and peak volume requirements set out in DEFRA's 'Sustainable Drainage Systems: Non-statutory technical standards for sustainable drainage systems' (March 2015).	where greenfield run-off rates are not feasible, this will need to be demonstrated by the applicant, and in such instances, the minimum requirement is to achieve at least a 50% attenuation. As this borough is particularly vulnerable to surface water flooding, as set out and addressed within the Council's SFRA as well as the Local Flood Risk Management Strategy, it is considered appropriate to have targets for SuDS that exceed the National SuDS standards. It should be noted that these targets are also in line with the London Plan and therefore the Local Plan complies with regional policy and guidance.
199	James Togher, Environment Agency	Minor amendments to policy: 3. Set back developments from river banks and existing flood defence infrastructure where possible ( <b>16 metres tidal Thames and 8 metres other rivers</b> ) 4. Take into account the requirements of the Thames Estuary 2100 Plan <b>and the River Thames Scheme</b> and demonstrate how the current and future requirements for 'for the River Thames tidal' flood defences have been incorporated into the development.	<ul style="list-style-type: none"> <li>• Agreed.</li> </ul>
		<b>Policy LP 22 Sustainable Design and Construction</b>	
200	Sarah Dixey, London Borough of Wandsworth	No duty to cooperate issues between Richmond and Wandsworth on this topic.	N/A
201	Katharine Harrison, Surrey County Council	Policy LP22 should have greater emphasis on the use of recycled or secondary aggregates and the efficient use of building materials in new development.	<ul style="list-style-type: none"> <li>• Reference to use of recycled and secondary materials in development will be included within para 6.3.1.</li> <li>• Policy LP24 also refers to sustainable use of materials in development.</li> </ul>
202	Katharine Fletcher, Historic England	Include reference to Historic England advice on ' <i>Energy efficiency and Historic Buildings</i> ' which provides technical advice to help prevent conflicts between energy efficiency requirements and the conservation of historic and traditionally constructed buildings.	<ul style="list-style-type: none"> <li>• Reference will be made to Historic England's advice '<i>Energy efficiency and Historic Buildings</i>'</li> </ul>
203	Brian Willman, Chair Ham and Petersham Neighbourhood Forum	Support the Council's aspiration to achieve zero carbon standards but would prefer zero carbon standards to be required unless evidence is provided showing it is not technically feasible. Support the encouragement to retrofit energy and water efficiency in existing developments.	<ul style="list-style-type: none"> <li>• Policy LP22 will be updated to provide further detail about the Council's approach to zero carbon. The application of the zero carbon standards will operate alongside the carbon offset fund. In addition, affordable housing will be prioritised, although this will not be stated explicitly in the policy text.</li> </ul>
204	Cllr Martin Elengorn, Environment Spokesperson Richmond upon Thames Liberal	Introduce additional sentence at the end of the policy stating: 'In other cases good design which promotes high levels of sustainability should mitigate impact on existing townscape'.	<ul style="list-style-type: none"> <li>• This paragraph of the policy refers to retrofitting and is mainly aimed at those developments that do not fall within the thresholds as set out in the policy, such as householder extensions and smaller scale proposals. It should be noted that the Plan and its policies need to be read as a whole to avoid repetition and cross-referencing, and policies in relation to high quality design and character are set out within Section 4 of the Plan.</li> </ul>

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	Democrat Councillors Group		
205	Mike Mills, Firstplan Ltd on behalf of Maxicorp Ltd	Currently new non-residential buildings above 100 sqm are required to meet BREEAM 'Excellent' – this threshold is considered too low. The policy does not provide evidence demonstrating that it is feasible and viable for non-residential development over 100sqm to meet BREEAM requirements. Other boroughs use a 1,000sqm threshold, aligned with the definition of 'major development'. Greater flexibility should be introduced in relation to the 35% reduction in CO2 targets in new developments to state that this should be achieved 'unless there is robust evidence to demonstrate that this is not feasible and/or viable'	<ul style="list-style-type: none"> <li>Richmond is a borough that tends to have relatively small scale developments and therefore the threshold of 100sqm is appropriate in the context of this borough. An accredited assessor will determine whether a scheme can be assessed against BREEAM or not.</li> <li>The requirement for 'excellent' is a long-standing policy requirement, that has been introduced in 2009 as part of the Core Strategy.</li> <li>The policy recognises that if CO2 requirements cannot be met then these must be justified in an Energy Statement.</li> <li>Also note that a Whole Plan Viability Assessment accompanies the Publication Plan.</li> </ul>
206	Neil Henderson, Gerald Eve on behalf of Reselton Properties Ltd	The policy should recognise more clearly instances when where a proposed development scheme will not be able to meet the stated 35% reduction in carbon dioxide emissions. We urge LBRuT to consider a carbon off-setting scheme, as this is one of the Mayor's priorities.	<ul style="list-style-type: none"> <li>The Council has now set up a Carbon Offset fund and the policy has been updated to reflect the Council's approach to zero carbon.</li> <li>If a development scheme cannot meet the 35% CO2 reduction using on-site measures, applicants will be able to pay a cash in lieu contribution into the Carbon Offset Fund; however, there is an expectation that CO2 emission reductions are being met on-site.</li> </ul>
207	Celeste Giusti, Greater London Authority on behalf of Mayor of London	With regards to improving air quality, Richmond should explicitly refer to reducing emissions from transport. Policy wording should refer to the London Plan policy 5.2 which expects the housing element of major developments to be 'zero carbon'.	<ul style="list-style-type: none"> <li>The Council considers that matters relating to air quality and reducing emissions from transport are already sufficiently covered in Policies LP10 and LP44 .</li> <li>Zero carbon standards have now been adopted. Policy LP22 will be updated to refer to London Plan policy 5.2.</li> </ul>
		<b>Policy LP 23 Water Resources and Infrastructure</b>	
208	Savills on behalf of Thames Water	Thames Water support the proposed new Policy however there should be clearer reference within the policy wording to the importance of water conservation and the efficient use of water because the EA has designated the Thames Water region as "seriously water stressed" which will impact on the availability of raw water for treatment as well as demand from customers for potable water. Thames Water support the mains water consumption target of 110 litres per head per day.	<ul style="list-style-type: none"> <li>Information on water efficiency and water consumption targets is contained within policy LP22 on Sustainable Design and Construction which sets out the specific standards to be followed in developments. As such, it is not considered necessary to repeat London's 'seriously water stressed' status in Policy LP23 as this is already covered in para 6.3.3.</li> </ul>
209	Ben Mackworth-Praed, on behalf of the Barnes Community Association	P.110 6.4.6: Add at end: "Ground water pumped up to protect or as the result of retro-fitted basements should not be discharged to the sewer system."	<ul style="list-style-type: none"> <li>This is covered in Policy LP21, para 6.2.12.</li> </ul>

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		<b>Policy LP 24 Waste Management</b>	
210	Katharine Harrison, Surrey County Council	Support for policy	N/A
		<b>Chapter 7 – Town Centres</b>	
211	Brian Willman, Chair Ham and Petersham Neighbourhood Forum	Hierarchy supports need to improve connectivity between centres. Rename 'Ham Common' as 'Ham Parade'	<ul style="list-style-type: none"> <li>• Rename Ham Common as Ham Parade.</li> </ul>
212	Tim Catchpole, Planning Representative Mortlake with East Sheen Society	Note reference to East Sheen providing office space for businesses. Support the reference to the Council creating a 'centre' for the village at Milestone Green and improving the convenience of shopping for the community including through a range of uses.	Noted
213	Jenine Langrish	Further shopping provision not needed.	<ul style="list-style-type: none"> <li>• The Council is required to plan for need for retail floorspace and provide sites in the Local Plan to meet any need identified. The Council commissioned consultants National Lichfield and Partners to produce a Retail Study to undertake a quantitative exercise to forecast retail need. It concluded that there is a modest need for retail floorspace during the Plan period. It made recommendations on how many site allocations would be required. The Study took into account structural changes occurring in the retail sector, including growth in internet shopping.</li> <li>• Planning policies are implemented flexibly. Where a shop has been properly marketed for an appropriate period (as set out in policy and in Appendix 5 on Marketing) a change of use may be acceptable.</li> <li>• In addition, recent changes to legislation governing permitted development has increased the scope for change from shops to other uses without the need to apply for planning permission, particularly in areas outside of designated shopping frontages (key shopping areas).</li> </ul>
		<b>Policy LP 25 Development in centres</b>	
214	Brian Willman, Chair Ham and Petersham Neighbourhood Forum	Ham & Petersham proposals to be included in due course when Neighbourhood Plan is further advanced.	<ul style="list-style-type: none"> <li>• Proposals for Ham and Petersham will be included in the Table in due course when the Neighbourhood Plan is further advanced.</li> </ul>
215	Brian Willman, Chair Ham and Petersham	Majority of residents are not more than 400ms from provision. Support for Ham Street/Back Lane centre.	<ul style="list-style-type: none"> <li>• Noted.</li> </ul>

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	Neighbourhood Forum		
216	Tanja El Sanadidy, Indigo on behalf of Shepherd Enterprises Limited	<p>Object to policies LP25, LP41 &amp; LP36.</p> <p>No mention of office uses within neighbourhood centres in policy. Designation of key office area in Hampton Wick is not consistent with designation as neighbourhood centre.</p> <p>Hampton Wick is a primarily residential area. It should not be defined as a neighbourhood centre.</p>	<ul style="list-style-type: none"> <li>• Hampton Wick is a mixed use area which contains several land uses as well as office. There is no conflict with the policy for development in centres. In subsection C the policy lists uses suitable in neighbourhood centres, which includes 'business and employment developments.'</li> <li>• The Secretary of State has accepted that the Key Office Area in Hampton Wick is appropriate and an Article 4 Direction to withdraw permitted development rights for change of use from office to residential is now in force.</li> <li>• The AMU and Key Office Area boundaries are not identical. Key Office Areas have been carefully defined to include offices assessed as being of good quality. The AMU covers a larger area encompassing more of the High Street.</li> </ul>
217	Charles Pineles, Planning Spokesman, Richmond Society	<p>Acknowledge Retail Study but oppose further A3, A4 or A5 uses in Richmond town centre.</p> <p>Concentrations are higher in Richmond than the UK average.</p> <p>Desire to provide larger floorplates could restrict diversity of offer. Richmond should maintain its individuality. Richmond Station allocation would provide larger floorplates and shift centre to detriment of the centre as a whole.</p> <p>Support improved transport &amp; management of parking.</p> <p>Support for diversity of leisure, cultural and tourism facilities.</p> <p>Seek to avoid uncontrolled spread of A3, A4 and A5 uses down the side lanes off George St (Brewers Lane, Golden Court, Paved Court, Duke St) and on Hill Rise and the Hill Rise /Petersham Road.</p> <p>Support for policy relating to over-concentration of uses, and retention of areas subject to further restriction.</p> <p>Concern that projections for increase in A3, A4, A5 are too high and would have detrimental impact on residents and services relating to their management.</p>	<ul style="list-style-type: none"> <li>• The retail frontages policy is designed to ensure that there is a good balance of uses in centres. This is achieved through the definition of designated shopping frontages which control change of use from retail. The policy also includes a criterion to limit over-concentration of a particular use and identifies parts of some centres including Richmond which are subject to further restrictions of A3 and A4 uses where appropriate. In addition the Council's Licensing Policy includes a Cumulative Impact Policy in Richmond and Twickenham in designated areas which restricts further drinking establishments. Any additional A3, A4 or A5 uses must be in accordance with these policies.</li> <li>• The 21,000 m2 figure relates to all provision including A1 retail, A3, A4 and A5 for the whole borough. The figure for A3, A4 and A5 uses in Richmond town centre is 2,884m2 gross by 2024. These forecasts result from a quantitative exercise produced for the Council by consultants National Lichfield and Partners. As stated above. New provision would need to be in accordance with all plan policies.</li> <li>• Much of provision for additional A3/A4/A5 is likely to come forward in the Richmond Station development rather than elsewhere in the centre. The majority of the town centre is designated as key or secondary frontage, reflecting the importance of Richmond main centre as the borough's principal centre.</li> <li>• Much of area identified by the respondent as suitable for further restriction is covered by key shopping frontage policy and therefore significant increase in A3, A4 and A5 is unlikely. Also the emerging retail frontages policy sets out the approach towards change of use from existing non-shop uses in designated frontages, that in such cases, proposals will</li> </ul>

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			<p>need to meet the requirements of policy in relation to over-concentration.</p> <ul style="list-style-type: none"> <li>• In relation to larger floor plates, it is considered that a major centre such as Richmond should have a range of store sizes in order to attract a mix of multiples and independents. It is acknowledged that it is important that Richmond retains its unique offer, allowing it to function alongside its larger neighbours.</li> </ul>
218	Tim Lennon, Borough Coordinator Richmond Cycling Campaign	Policy should include more emphasis on accessibility & transport.	<ul style="list-style-type: none"> <li>• Other policies in the Plan, including Policy LP 44 Sustainable Travel Choices as well as Policy LP 45 Parking Standards and Servicing include guidance on cycling including cycle parking provision.</li> </ul>
219	Tim Lennon, Borough Coordinator Richmond Cycling Campaign	Policy needed to manage deliveries to town centres to make centres more inviting to residents.	<ul style="list-style-type: none"> <li>• Policy LP 45 Parking Standards and Servicing deals with servicing and deliveries. In particular, para 11.2.6 states that the majority of the borough's businesses and other organisations require regular servicing and deliveries to their site(s). However, it must be recognised that whilst these vehicles provide a vital service, they can also be a cause of congestion, safety and environmental concerns if not properly managed through a variety of mechanisms. A balance needs to be struck between ensuring that businesses are able to receive the goods and services needed, whilst maintaining the attractiveness of the centres as well as protecting residential amenity.</li> <li>• A range of techniques and facilities can be used as tools in minimising any negative impacts from freight and servicing, and these will be considered in detail, on a case-by-case basis as part of a planning application, and where required, through planning conditions.</li> </ul>
220	Sarah Stevens, Turleys for British Land	List of appropriate uses in town centres should reflect that in NPPF. The 200m2 threshold should relate to the need for an impact assessment. Support for policy to optimise the use of land.	<ul style="list-style-type: none"> <li>• Subsection 2b of the "Development in Town Centres" policy sets out the approach to the location of development. The wording reflects the area-based policies of the Local Plan (main centre boundaries for the 5 larger centres and elsewhere Areas of Mixed Use). This approach is long-established policy.</li> <li>• The Council considers that it is reasonable to apply a threshold for extensions above which the sequential test should apply. This is important in this borough because of the general lack of sites for retail development. In recent years several applications have been received for extensions to existing facilities.</li> <li>• Support for the need to optimise land is noted.</li> </ul>
221	Tim Lennon, Borough	Policy should include more emphasis on accessibility & transport.	<ul style="list-style-type: none"> <li>• Other policies in the Plan, including Policy LP 44 Sustainable Travel Choices as well as Policy LP 45 Parking Standards and Servicing include guidance on</li> </ul>

Ref No.	Name / Organisation	Summary of response received	Council's response
	Coordinator Richmond Cycling Campaign		accessibility and transport and the Plan and its policies need to be read as a whole. This avoids lots of repetition and cross-referencing.
222	Celeste Giusti, Greater London Authority on behalf of Mayor of London	Welcomes distinctive approach to main town centres. Disappointed that the policy does not explicitly support housing in town centres. The Mayor also encourages active uses on the ground floor.	<ul style="list-style-type: none"> <li>Centres in borough are generally buoyant with vacancy rates below the national average. This is evidenced by the research relating to town centres, in particular town centre health checks. The NLP Retail Study has forecast a modest increase in retail floorspace will be needed over the Plan period.</li> <li>One of the key purposes of the retail frontages policy is to ensure that there is a good balance of uses in town centres and designated frontages are carefully defined to meet that aim. This process takes into account the health of individual centres and the need to avoid long-term vacancies.</li> <li>Changes to permitted development rights have introduced further scope for housing outside of key shopping areas.</li> <li>The Council considers that the proposed policies encourage housing in centres, recognising the contribution it makes in supporting town centres. Policies support appropriate conversion of upper floors and the rear of units which will deliver residential capacity in centres. However, bearing in mind the health of the borough centres and the forecast increase in retail floorspace required, there is a need to encourage commercial uses at ground floor in this borough.</li> </ul>
223	Cllr Martin Elengorn, Environment Spokesperson Richmond upon Thames Liberal Democrat Councillors Group	7.1.12: omit "for villages" in heading. Omit "village" in lines 2 and 3. Omit second "Village Plan" in third heading of table	<ul style="list-style-type: none"> <li>The Council has decided to use the term 'villages', as defined within the glossary as: "A term applied to define the distinct and local areas in this borough as determined by local communities."</li> </ul>
224	Maria Walker	Support for policy to improve streetscape outside of Twickenham Studios. Area currently an eyesore and not in keeping with the rest of the centre.	Noted
		<b>Policy LP 26 Retail Frontages</b>	
225	Stephen Rankin	Support for over-concentration policy. Experienced anti-social behaviour. Need for further restriction – introduction of Article 4 Directions in specified locations. Retail Study identifies retail demand in Teddington. It does not refer to Article 4 Directions. Sites identified for retail may not come forward. Pressure on centre for further A3 uses. Circumstances in Teddington differ from national picture.	<ul style="list-style-type: none"> <li>The introduction of an Article 4 Direction to withdraw permitted development rights is not always the most appropriate tool and is expensive to deliver. It is not a ban on certain types of development. Permitted development rights are withdrawn and therefore planning permission must be sought, but may also be granted.</li> <li>Most of the permitted development rights for change of use to the A3 Use</li> </ul>

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			<p>Class are subject to a prior approval process, including considering impact on the shopping area.</p> <ul style="list-style-type: none"> <li>The prior approval process for change of use to A3 from A1, A2, betting shops and casinos (Schedule 2 Part 3 Class C) allows other matters to be considered which affect residential amenity including noise, odour, storage &amp; handling of waste and hours of opening. Therefore the Council has a degree of control.</li> </ul>
226	Caroline Brock, Kew Society	<p>Introduce flexibility for length of marketing required to avoid unsightly underused facilities for long periods. Insertion of phrase “normally at least 2 years”.</p> <p>If a shorter period is accepted conditions could be imposed re the appearance of the shop pending redevelopment and that the development must be begun within 18 months.</p>	<ul style="list-style-type: none"> <li>The Council considers that 2 years is an appropriate length of time for marketing. The borough's centres are generally buoyant and in many, demand for retail exists. Residential land values are high. It is therefore important to properly test the market.</li> <li>It is the purpose of the Local Plan and its policies to clearly set out targets and requirements. Where evidence and justification is submitted as part of a planning application, the Council has the ability to consider applying some flexibility to the period of marketing required, but only where this is fully justified.</li> <li>Conditions are applied relating to specific premises. In some instances voluntary arrangements are made with owners to improve window displays before a new occupant is found.</li> </ul>
227	Brian Willman, Chair Ham and Petersham Neighbourhood Forum	Support for overconcentration policy in para 7.2.10 and policy LP30.	Noted
		<b>Policy LP 27 Local Shops, Services and Public Houses</b>	
228	Brian Willman, Chair Ham and Petersham Neighbourhood Forum	Support for policy to retain pubs.	Noted
229	Caroline Brock, Kew Society	<p>Introduce flexibility for length of marketing required to avoid unsightly underused facilities for long periods. Insertion of phrase “normally at least 2 years”.</p> <p>If a shorter period is accepted conditions could be imposed for example – governing the appearance of the shop pending redevelopment or that the development must be begun within 18 months.</p>	<ul style="list-style-type: none"> <li>The Council considers that 2 years is an appropriate length of time for marketing. The borough's centres are generally buoyant and in many, demand for retail exists. Residential land values are high. It is therefore important to properly test the market.</li> <li>It is the purpose of the Local Plan and its policies to clearly set out targets and requirements. Where evidence and justification is submitted as part of a planning application, the Council has the ability to consider applying some flexibility to the period of marketing required, but only where this is fully justified.</li> <li>Conditions are applied relating to specific premises. In some instances</li> </ul>

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			voluntary arrangements are made with owners to improve window displays before a new occupant is found.
230	Geoff Bond, Chair Ham and Petersham Association	Support for introduction of Article 4 Direction to restrict PD rights in Ham Parade.	Noted
231	Sally Arnold, Planning Potential Ltd on behalf of Power Leisure Bookmakers	<p>Policy is similar to previous. It excludes other town centre uses in key shopping frontages.</p> <p>Text in 7.2.5 (relating to existing non-A1 uses) should be in policy – otherwise conflicting with each other.</p> <p>In relation to secondary frontages, clarification in the supporting text regarding B1 and SG uses should be in the main policy.</p> <p>Over-concentration policy – objection to the referencing of betting shops in list of examples.</p> <p>Marketing requirement of 2 years is overly-onerous and unnecessary.</p> <p>Unnecessary burden on betting shop operators. Does not foster completion as in para 23 of NPPF.</p>	<ul style="list-style-type: none"> <li>• The Council considers that the policy text does provide clarity in relation to key shopping frontages. This is a long standing policy to protect retail in core areas. The NLP Retail Study forecast a modest need for additional retail floorspace over the plan period. Key shopping frontages are carefully defined to ensure that there is sufficient retail floorspace to meet the forecast demand. Key shopping frontages work in tandem with secondary shopping frontages where a level of diversification is appropriate and where new non-shop uses are expected to be located.</li> <li>• The references in the supporting text, acknowledge that there are existing non-shop uses in key shopping frontages and in the interests of clarity give advice on implementation where this is the case. The words “For clarity” have been inserted in paragraph 7.2.5.</li> <li>• In relation to secondary shopping frontages, a minor change to wording is proposed to avoid potential conflict between the policy and supporting text. The policy includes a criterion which clarifies that there are other businesses which are suitable in secondary shopping frontages providing that they are offering direct services to the public.</li> <li>• The list including betting offices is not exhaustive. The inclusion of this use is merely as an example.</li> <li>• Subsection G of this policy states that marketing is required where a change of use is not supported by policy. It will not therefore be necessary to supply it where a proposal is in line with policy. Hence it will not be necessary in every case.</li> <li>• The Council considers that the period of 2 years is appropriate. It is important to properly test the market. The aim of Appendix 5 – Marketing is to provide clarity for applicants.</li> <li>• It is the purpose of the Local Plan and its policies to clearly set out targets and requirements. Where evidence and justification is submitted as part of a planning application, the Council has the ability to consider applying some flexibility to the period of marketing required, but only where this is fully justified.</li> </ul>
232	Sally Arnold, Planning Potential Ltd on	<p>Intention of policy unclear. Policy restricts Sui Generis uses such as betting shops from local centres if they are not within 400 metres of key / secondary frontage.</p> <p>This effectively means that betting shop operators are restricted from locating in</p>	<ul style="list-style-type: none"> <li>• The aim of policy is to protect local shopping and services in isolated locations, i.e. more than 400 metres from existing provision. It is a long-established planning policy.</li> </ul>

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	behalf of Power Leisure Bookmakers	many areas of the borough contrary to NPPF.	<ul style="list-style-type: none"> <li>• Changes of use within centres are not prohibited per se, but are subject to other plan policies, particularly the retail frontages policy.</li> <li>• Built up areas in the borough to which the policy applies are not as prolific as the objector maintains.</li> </ul>
233	Charles Pineles, Planning Spokesman, Richmond Society	<p>Support for over-concentration policy. Minor policy wording changes suggested to strengthen it as follows:</p> <ol style="list-style-type: none"> <li>1. Heading to read 'Over-concentration of uses and <u>adverse</u> impact on amenity'</li> <li>2. Changes: 'The Council will resist proposals that result in an over-concentration of similar uses (such as betting shops, estate agents, restaurants, <u>pubs, bars</u> and take-aways) in any one area and/or would result in an adverse impact on the amenity of nearby users as well as surrounding residential areas, including <u>an adverse</u> cumulative <del>adverse</del> effect.'</li> </ol> <p>New Policy LP 26 D page 128 to read as follows: 'There are areas of the borough where certain changes of use <u>and intensification of use ...</u>'</p>	<ul style="list-style-type: none"> <li>• Minor changes to wording are proposed to Subsection C of the retail frontages policy. Subsection C now contains a reference to the policy being applicable to both changes of use and significant extensions in floorspace, which is further explained by an addition to the supporting text (paragraph 7.2.9). These amendments reflect the respondent's comments on intensification of use from a land use planning perspective.</li> </ul>
<b>Chapter 8 – Community Facilities</b>			
<b>Policy LP28 Social and Community Infrastructure</b>			
234	Heather Mathew, Richmond CVS	The policy should recognise more clearly the important contribution that the voluntary and community sector makes to 'meeting people's needs', particularly for their social value.	<ul style="list-style-type: none"> <li>• The Spatial Strategy (Chapter 3) will be updated to reflect the social value of voluntary and community sector services.</li> <li>• Policy LP28 aims to retain sufficient floorspace for use by the voluntary sector and includes various references in this regard. In addition, paragraph 8.1.10 (criterion 3) which outlines the Council's approach whereby if a particular social infrastructure facility is no longer required for its current use applicants are required to assess use of the space for alternative social infrastructure purposes before any change of use is permitted, emphasises that '<i>as part of the marketing process space should be offered at a reasonable charge for community groups / voluntary sector organisations reflecting its existing use value and condition.</i>'</li> </ul>
235	Brian Willman, Chair Ham and Petersham Neighbourhood Forum	Support the multi-use of premises for community usage but note that this is difficult in reality because of restricted availability and cost.	<ul style="list-style-type: none"> <li>• Multi-use of social infrastructure premises is achievable through Community Use Agreements which can be agreed as part of a planning permission. No policy change required.</li> </ul>
236	Ross Anthony, The Theatres Trust	Support the policy but the description in para 8.1.2 could be simplified. Recommend: 'community facilities provide for the health, welfare, social, educational, spiritual, recreational, leisure and cultural needs of the community'.	<ul style="list-style-type: none"> <li>• The additional sentence has been included at the beginning of para 8.1.1.</li> </ul>
237	Mel Barlow-Graham, London Fire and Emergency	Fire stations should not be listed as community infrastructure; the following wording should be included: 'This is with the exception of fire station sites, which will not be subject to such restriction on use'. This is because the location of any fire station within a particular area is determined by strategic planning,	<ul style="list-style-type: none"> <li>• Fire stations are and have always been considered a social infrastructure facility. This is in line with London Plan policy 3.16. No change required to Policy LP28.</li> </ul>

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	Planning Authority	including response times, fire cover and other operational matters, with the purpose of ensuring that the whole of London is properly covered to deliver its statutory duty. Also, the sale of surplus LFEPA sites provides funding for the continued development of fire-fighting facilities.	
238	George Burgess, Indigo Planning on behalf of Beechcroft Developments Ltd	Criteria 3 of policy LP28 in relation to assessing the potential of re-using or redeveloping the existing site for the same or alternative social infrastructure use should only be in relation to uses for which there is a defined local need, in line with the London Plan. Paragraph 8.1.2 lacks the clarity required to guide potential developers in the Borough.	<ul style="list-style-type: none"> <li>• Para 8.1.6 of policy LP28 explains that 'need' is identified on an evidential basis from the Council's and partner's strategies. However it is agreed that the policy could be worded to more clearly reflect this approach as well as London Plan policy 3.16 which states that <i>'The suitability of redundant social infrastructure premises for other forms of social infrastructure for which there is a defined need in the locality should be assessed before alternative developments are considered.'</i> This reference has been included in Part C.3 of Policy LP28.</li> <li>• Paragraph 8.1.2 is a non-exhaustive list of the types of facilities and services that the Council considers to be social and community infrastructure facilities. Each application will be assessed on its own merits.</li> </ul>
239	Charles Pineles, Planning Spokesman, Richmond Society	Meadows Hall in Church Road, Richmond should be retained for flexible community use, recognising that some enabling development would be necessary.	<ul style="list-style-type: none"> <li>• Agreed. The retention of Meadows Hall for community use will be supported through policy LP28; no update to the policy is required.</li> </ul>
240	Dale Greetham, Sport England	Indoor and outdoor sports facilities should be specifically mentioned within policy LP28. Reference should be made to the Richmond Playing Pitch Strategy.	<ul style="list-style-type: none"> <li>• Indoor sports facilities are covered by Policy LP28. Para 8.1.2 includes recreation and sports facilities as examples of social infrastructure.</li> <li>• Outdoor sports facilities are covered separately by Policy LP31. This policy specifically references the Council's Playing Pitch Strategy. It should be noted that the Plan and its policies need to be read as a whole. This avoids lots of repetition and cross-referencing.</li> </ul>
		<b>Policy LP29 Education and Training</b>	
241	Richard Geary	Greater time and money should be spent on '18D: identifying new sites for educational uses as part of this Plan; the Council will work with landowners and developers to secure sites for pre-schools, primary and secondary schools as well as sixth forms to ensure sufficient spaces can be provided for children aged 2-18'	<ul style="list-style-type: none"> <li>• Noted. A number of sites are allocated for educational use within the Local Plan including SA9, SA17, SA23 and SA27. In addition the Council's Infrastructure Delivery Plan will be updated shortly to provide greater detail about delivery of education on these sites.</li> </ul>
242	Bethany Evans, NLP Planning on behalf of The Harrodian School	Support for policy LP29 in relation to maximising existing educational sites through extensions, redevelopment or refurbishment to meet identified educational needs	<ul style="list-style-type: none"> <li>• Support noted</li> </ul>
243	Tim Sturgess, Bilfinger GVA on behalf of The Lady Eleanor	Policy LP29, Para 8.2, Page 139-142: Omission of Change to MOL boundary for LEHS See comment 156 above.	<ul style="list-style-type: none"> <li>• As discussed with LEHS, the Council is not reviewing MOL boundaries as part of this Local Plan.</li> </ul>

Ref No.	Name / Organisation	Summary of response received	Council's response
	Holles School		
244	Tim Catchpole, Planning Representative Mortlake with East Sheen Society	Do not support proposal for additional school places in the Mortlake / East Sheen area, particularly proposals on the Stag Brewery or Barnes Hospital site because access to both sites is poor by both public transport and car. Map of existing schools should be provided in the Education and Training section of the Plan.	<ul style="list-style-type: none"> <li>The Council's <a href="#">School Place Planning Strategy 2015-24</a> indicates need for school provision in the Barnes / Mortlake and Barnes Common area (Area 9). Given the difficulty in finding appropriate / available development sites in the borough, including for new schools, any accessibility issues will need to be addressed as part of planning applications, including through the use of Travel Plans. This should be achievable to enable the Council to provide school places on the Stag Brewery Site and Barnes Hospital Site in order to meet local need. Travel Plans and Transport Assessment will therefore be required to mitigate any potential harmful impacts on local amenity and congestions.</li> <li>Map of schools will be included within the forthcoming updated Infrastructure Delivery Plan.</li> </ul>
245	Celeste Giusti, Greater London Authority on behalf of Mayor of London	Support for approach of maximising existing educational sites through extensions, redevelopment or refurbishment as well as the co-location with other social infrastructure.	<ul style="list-style-type: none"> <li>Support noted</li> </ul>
246	Tom Sadler, Bilfinger GVA on behalf of Defence Infrastructure Organisation	The Draft Local Plan fails to recognise and plan for the role that sites such as Kneller Hall could play in meeting identified education needs. The most recent education research published by the Council is from 2007 so the evidence base used to support the draft policies is out of date, therefore the policies cannot be effective in meeting the Borough's education needs. An updated study should be undertaken and appropriate land subsequently identified.	<ul style="list-style-type: none"> <li>A new site allocation for Kneller Hall will be added (see response to comment 474 below)</li> <li>The Council's <a href="#">School Place Planning Strategy 2015-24</a> was published in 2015 and is available on the Council's website.</li> </ul>
247	Judith Livesey, NLP Planning on behalf of St Paul's School	Support for policy LP29, particularly the commitment to support the provision of educational facilities and encouraging the potential to maximise existing and educational sites through extensions, redevelopment or refurbishment to meet identified educational needs. The School welcomes the recognition of the role of the independent sector in the Borough and supports the inclusion of this in the draft Plan.	<ul style="list-style-type: none"> <li>Support noted</li> </ul>
		<b>Policy LP30 Health and Wellbeing</b>	
248	Brian Willman, Chair Ham and Petersham Neighbourhood Forum	A deficiency in primary health care facilities remains in Ham and this should be referenced in policy. Support for restricting A5 takeaways near schools.	<ul style="list-style-type: none"> <li>Site specific references have generally been removed from the Local Plan policies to ensure the Plan remains flexible and does not become out of date too quickly; specific references will however be included in the update of the Council's Infrastructure Delivery Plan, which the Council is able to update on a more frequent and regular basis.</li> <li>Note that according to the Richmond CCG, there is currently no identified shortage of primary health facilities in Ham.</li> </ul>

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			<ul style="list-style-type: none"> <li>• Support for takeaways restriction noted.</li> </ul>
249	Caroline Brock, Kew Society	Policy LP30 should promote non-conflict between all transport uses on all thoroughfares.	<ul style="list-style-type: none"> <li>• This is not a matter for the Local Plan; however colleagues in the Council's Highways Department will be made aware of this.</li> </ul>
250	Steve Simms, SSA Planning Limited on behalf of Kentucky Fried Chicken (Great Britain) Limited	<p>Object to the takeaways policy because:</p> <ul style="list-style-type: none"> <li>• There is no evidence for a causal link between the incidence of obesity and proximity of clusters of hot food takeaways to schools.</li> <li>• The distance chosen would have the effect of banning hot food takeaways from the majority of the Borough.</li> <li>• The policy assumes that all takeaways provide only 'unhealthy food' and does not consider the fact that 'unhealthy food' is available in many other A use class premises, so focussing only on A5 uses is unfair.</li> <li>• A better approach would be to set maximum proportions of hot food takeaways based on objective evidence in a retail study, instead of focussing on particular uses considered to be a problem.</li> <li>• The inclusion of primary schools is problematic as children at primary schools are not usually permitted to leave the premises at lunchtime.</li> <li>• How will the effectiveness of the policy be monitored, given its proposed extent?</li> </ul>	<ul style="list-style-type: none"> <li>• Restricting children's access to fast food takeaways is a well-established way in which the planning system can contribute towards tackling rising childhood obesity and is an approach that has been adopted in many other boroughs.</li> <li>• Primary schools have been included because it is at this young age when children learn and/or get accustomed to healthy (or unhealthy) behaviours, which continue into adulthood. Secondary schools have been included because children are likely to leave school unaccompanied at lunch time and before / after school. Therefore, while the Council recognises that the proposed 'restriction zone' covers a large proportion of the borough, this approach is considered to be justified. Hot food takeaways already in existence within the 'restriction zone' will not be affected.</li> <li>• The point that not all hot food takeaways provide unhealthy food and that unhealthy food is available in other establishments is recognised; however the majority of fast food takeaways which attract young people do tend to provide unhealthy food. The planning system does not distinguish between 'healthy' or 'unhealthy' A5 uses.</li> <li>• Retail policy LP26 already places a restriction on A5 uses in certain locations in the borough in order to prevent intensification in areas identified as having an existing over-concentration. However, the rationale for the proposed restriction in Policy LP30 is not for concerns over the vitality and function of a main or local centre but because of health concerns that can be perpetuated by a proliferation of hot food takeaways. The policy is therefore based on a public health evidence base and unrelated to the retail study.</li> <li>• The proposed 400m restriction zone around both primary and secondary schools will be maintained as this is the general denominator for walking distances.</li> <li>• The effectiveness of the policy will be monitored by the Council's Public Health team in terms of numbers of children affected by obesity, as well as through the Authority's Monitoring report, which the Council produces on a regular basis.</li> </ul>
251	Liz Ayres, Richmond Clinical Commissioning	Include reference to a need for pharmacy services.	<ul style="list-style-type: none"> <li>• Reference to a need for pharmacy services will be included within policy LP30.</li> </ul>

Ref No.	Name / Organisation	Summary of response received	Council's response
	Group		
252	Ben Mackworth-Praed, on behalf of the Barnes Community Association	The Councils' Community Toilet Scheme needs to be re-examined; there are too few sites available in Barnes.	<ul style="list-style-type: none"> <li>This is not a matter for the Local Plan; however relevant colleagues in the Council will be made aware of this.</li> </ul>
253	Charles Pineles, Planning Spokesman, Richmond Society	Cycling tends to be concentrated in particular areas at particular times, notably weekends in Richmond Park and Richmond tow path; the Council should explore ways in which all road travellers can work together.	<ul style="list-style-type: none"> <li>It should be noted that this is the Local Plan and not the borough's cycling strategy or Local Implementation Plan. For information, the Council is carrying out a public consultation on the borough's Cycling Strategy in the autumn of 2016: <a href="https://consultation.richmond.gov.uk/environment/cycling">https://consultation.richmond.gov.uk/environment/cycling</a></li> </ul>
		<b>Policy LP31 Public Open Space, Play Space Sport and Recreation</b>	
254	Cllr Martin Elengorn, Environment Spokesperson Richmond upon Thames Liberal Democrat Councillors Group	Line 4 - after "character" add "and biodiversity value" 8.4.5 - line .2 - after "character" add "nature conservation"	<ul style="list-style-type: none"> <li>This policy focuses on providing space for play, sport and recreation. Matters relating to biodiversity and nature conservation are covered in Policies LP15 (Biodiversity) and LP12 (Green Infrastructure)</li> </ul>
255	Dale Greetham, Sport England	Indoor and outdoor sports facility needs should be specifically mentioned within policy LP31. Reference should be made to the Richmond Playing Pitch Strategy.	<ul style="list-style-type: none"> <li>Indoor sports facilities are covered by Policy LP28 (see response to comment 240 above) so these will not be mentioned within policy LP31 to avoid causing confusion for applicants.</li> <li>Policy LP31 states that 'formal and informal sports grounds and playing fields will be protected, and where possible enhanced' with detailed explanation provided in paras 8.4.16 – 8.4.20. However specific 'needs' in specific locations will not be included within the Local Plan as these are already set out in the Council's Playing Pitch Strategy, which is referenced in paragraph 8.4.17. In addition, there is an opportunity to include specific needs within the update of the Council's Infrastructure Delivery Plan.</li> </ul>
256	Sarah Stevens, Turleys for British Land	Suggest amendments to policy LP31: <ul style="list-style-type: none"> <li>Paragraph 1 of the policy should explicitly recognise that there are some cases where on-site public open space is not feasible and an alternative approach could be financial contributions towards improving existing facilities.</li> <li>Paragraph 2 of the policy, which seeks publicly accessible play space in new major developments, should be considered on a case by case basis as this requirement may compromise meeting private play space requirements</li> </ul>	<ul style="list-style-type: none"> <li>Paragraph 3 of Policy LP31 already recognises that 'where on-site provision of public open space or play space is not feasible or practicable; in such instances, financial contributions will be required to either fund off-site provision, or improvements and enhancements of existing facilities'.</li> <li>For clarification, the Council does not have policies for private play space requirements; all new play space should be publicly accessible as this will assist in ensuring a new development integrates well within the surrounding area and within existing communities. It should be noted that</li> </ul>

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		and/or potentially generate amenity concerns.	applications are always considered on a case by case basis.
257	Rob Gray, Friends of the River Crane Environment (FORCE)	Walking distances to open spaces included in policy LP31 are larger than the London Plan distances. The policy should be explicit that the distances in LP31 are along pedestrian routes rather than as the crow flies.	<ul style="list-style-type: none"> <li>London Plan policy 7.18 (Table 7.2) provides a benchmark for boroughs to assess their own provision for / access to different categories of open space. Local accessibility standards in policy LP31 are specific to the borough, based on research undertaken as part of the Council's Open Space Assessment (2015).</li> <li>Para 8.4.9 and 8.4.13 of Policy LP31 clearly refer to walk time / walking distances rather than as the crow flies.</li> </ul>
258	Tim Lennon, Borough Coordinator Richmond Cycling Campaign	Policy LP31 should prioritise walking and cycling in accessing open space and should include the need for accessibility for all users, i.e. including people with disabilities	<ul style="list-style-type: none"> <li>Emphasis on walking and cycling and provision of an accessible and inclusive public realm is covered in greater detail in Policy LP44 (paras 11.1.4-11.1.9). This approach applies equally in relation to access to open space; therefore it is not considered necessary to repeat this approach within Policy LP31.</li> <li>For information, the Council is carrying out a public consultation on the borough's Cycling Strategy in the autumn of 2016: <a href="https://consultation.richmond.gov.uk/environment/cycling">https://consultation.richmond.gov.uk/environment/cycling</a></li> </ul>
		<b>Policy LP32 Allotments and food growing spaces</b>	
259	Brian Willman, Chair Ham and Petersham Neighbourhood Forum	The second part of the policy LP32 referring to allotments becoming surplus to requirements is inconsistent with the evidence of long waiting lists indicating unmet demand for allotment spaces across the borough.	<ul style="list-style-type: none"> <li>Noted. A change is proposed to ensure this part of the policy refers to the <i>unlikely event</i> of allotments becoming surplus to requirements</li> </ul>
		<b>Policy LP33 Telecommunications</b>	
260	Brian Willman, Chair Ham and Petersham Neighbourhood Forum	Need to prioritise addressing the particularly poor broadband speeds and mobile phone reception in Ham and Petersham	<ul style="list-style-type: none"> <li>The supporting text is to be amended to recognise that there are parts of the borough with poor reception and coverage.</li> </ul>
261	William Mortimer	Need for emergency and disaster management and how telecommunications and technologies will function during emergencies. Need to consider communicating with vulnerable and elderly during disasters. Need for satellite communication.	<ul style="list-style-type: none"> <li>Comments and concerns in relation to emergency and disaster management are noted. The Council has a lot of information published on its public website in relation to accidents and emergencies: <a href="http://www.richmond.gov.uk/accidents_emergencies_and_safety.htm">www.richmond.gov.uk/accidents_emergencies_and_safety.htm</a>, including on how to get information, coping emotionally and general evacuation advice.</li> </ul>
262	Charles Pineles, Planning Spokesman, Richmond Society	We have often requested that the masts, cabinets and pillars be placed in less intrusive, convenient, or more pedestrian orientated, positions, often within a matter of metres of that proposed - without thought - by the provider, in accord with 8.6.2. 8.6.3: we are not entirely convinced by the system of self-certification and would ask the council to keep this under review.	<ul style="list-style-type: none"> <li>Noted. It is considered that 8.6.2 sufficiently addresses this point.</li> <li>Self-certification will be kept under review.</li> </ul>

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		<b>Chapter 9 – Housing</b>	
263	Spelthorne Borough Council	Notes consideration of conversions to meeting housing needs. Spelthorne is currently considering the impact of residential extensions on housing stock, which tends to deplete stock of smaller more affordable dwellings. A greater proportion of smaller dwellings is needed and may increase overall delivery.	<ul style="list-style-type: none"> <li>The Borough SHMA sets out household spaces by number of dwellings based on 2011 census data. The impact of extensions may partly be addressed through the policy on Housing Mix and Standards which seeks a higher proportion of small units in the five main centres and Areas of Mixed Use.</li> </ul>
264	Brian Willman, Chair Ham and Petersham Neighbourhood Forum	General support for housing policies. Look forward to detailed legislation on Starter Homes when emerges.	<ul style="list-style-type: none"> <li>Noted. At the time of writing, awaiting further details in the Government's Housing White Paper later this year.</li> </ul>
265	Alison Mackay, Colliers on behalf of Greggs Plc	Support recognition to deliver housing target and approach to direct largest housing growth to Twickenham and Richmond. To ensure delivery, there is a need to allocate suitable sites for residential development. Given constraints and reliance on completions through PD office to residential conversions, it is essential to allocate previously developed industrial sites. Particularly the case since introduced a blanket ban on PD rights as this accounted for 68% of completions. New allocations should be by way of reviews which recommends lower quality sites to be released for residential or mixed use.	<ul style="list-style-type: none"> <li>The Council has identified sufficient five year housing land supply and in years six to ten to exceed the strategic dwelling requirement considering suitability, availability and achievability of sites. There is no blanket ban on PD rights. It is not considered necessary to allocate industrial sites where the protection of employment land is justified.</li> </ul>
266	Spelthorne Borough Council	Using the London Plan housing target is based on an out of date housing need figure. The Council should be exploring all options to fully meet the level of need set in the SHMA. Failing to meet this has implications for adjoining authorities and the expectation that Spelthorne might take part of this need has not been discussed under the Duty to Cooperate.	<ul style="list-style-type: none"> <li>The Plan seeks to exceed the London Plan housing target, however it is considered that a realistic approach needs to take account of limited land supply and be consistent with past trends. This may reinforce a migration pattern which London boroughs have experienced for some years, but across the London Plan area additional capacity is being identified to meet the strategic need for housing across London and the GLA is working with authorities in the Wider South East. This is considered in accordance with the NPPF that Plans should meet objectively assessed needs unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits or policies within the NPPF indicate that development should be restricted. The Council has not requested for Spelthorne to take part of this need, although Duty to Cooperate discussions continue.</li> </ul>
267	Sarah Stevens, Turleys for British Land	It should be acknowledged there will be windfall sites, not yet identified but equally strategic and/or can aid delivery of the vision and objectives and exceeding housing targets. The previous draft Site Allocations DPD acknowledged that not all the present and future needs will be met through allocated sites.	<ul style="list-style-type: none"> <li>Windfall sites will come forward, it is not considered necessary to refer to this.</li> <li>Reference to the fact that not all present and future needs will be met through allocated sites is to be added to the introductory paragraphs of the Site Allocations sections of the Plan.</li> </ul>
		<b>Policy LP 34 New Housing</b>	

Ref No.	Name / Organisation	Summary of response received	Council's response
268	Brian Willman, Chair Ham and Petersham Neighbourhood Forum	The new housing units table should be broken down to provide more detailed guidance for Ham, Petersham and Richmond Riverside (as in the current Plan).	<ul style="list-style-type: none"> <li>The current Plan omitted in the area description the wards of South Richmond, North Richmond, and Kew which were included within the total for the Richmond area. For consistency the broad areas are maintained in this Plan. Detailed completions/future supply by each ward is set out in the AMR Housing Reports.</li> </ul>
269	Charles Pineles, Planning Spokesman, Richmond Society	<p>Concern that the expectation to exceed housing target in the London Plan may no longer be the case in light of the imminent Review.</p> <p>The Richmond Area allocation has risen from 700 to 1000 units.</p> <p>9.1.8 Retention of land in employment use: there is a limit to the amount of developable land before serious encroachment is made on services and employment and this should be looked at from a longer term perspective.</p>	<ul style="list-style-type: none"> <li>The Plan seeks to exceed the London Plan housing target to be in general conformity with the existing London Plan. The totals for the broad locations reflect the strategic dwelling requirement. Details of the London Plan Review have not yet been published.</li> <li>The Plan seeks to take a long term perspective to 2033 taking into account the range of different land uses.</li> </ul>
270	Helen Harris, Cushman and Wakefield on behalf of Royal Mail Group Ltd	<p>Important to protect Royal Mail's assets and operations, and in planning future investment across its estate and supporting its infrastructure. Royal Mail has a statutory duty to provide efficient mail sorting and delivery services within the borough. Services are currently provided from Richmond Delivery Office, Teddington Delivery Office and Mortlake and Barnes Delivery Office. There are no plans to relocate in the foreseeable future as the delivery offices are of strategic importance to Royal Mail in ensuring they are able to continue to fulfil their statutory duty for mail collection and delivery.</p> <p>Major increases in number of dwellings are likely to have impacts on the capacity of Royal Mail's operations and on its ability to provide its services. As a guide, for every 500 new dwellings proposed, one additional postal round (described by Royal Mail as a "walk") is required. Predicted growth will potentially have major capacity implications for existing delivery offices. Therefore, Royal Mail is likely to seek expansion of its existing assets or require the allocation of sites for additional delivery offices, particularly in those locations where housing developments will be concentrated and where existing delivery offices are nearing capacity.</p>	<ul style="list-style-type: none"> <li>The site allocations relating to the delivery offices (i.e. Hampton Delivery Office, Teddington Delivery Office, and Mortlake and Barnes Delivery Office) will be amended to reflect that Royal Mail has currently no plans to relocate operations from existing delivery offices.</li> </ul>
271	Tim Catchpole, Planning Representative Mortlake with East Sheen Society	The new housing units table should be clarified if the total for East Sheen includes the units expected on the Stag Brewery site.	<ul style="list-style-type: none"> <li>A provisional figure for the Stag Brewery is included in the detailed future supply for large sites set out in the AMR Housing Reports. The totals for the broad locations reflect the overall pattern of future housing land supply in the AMR housing land supply has been used to against the strategic dwelling requirement.</li> </ul>
272	James Sheppard, CBRE on behalf of LGC Ltd	Housing requirements for LBRuT are likely to increase in London Plan review. CBRE have carried out a high-level assessment of the sites that contribute to proposed housing delivery as illustrated in the AMR (2014/15). It is highly likely that a number of suggested sites, (particularly proposal/other known sites), or phases of sites will not be delivered over the five year period. As such, other available, suitable and achievable sites should be allocated to ensure that	<ul style="list-style-type: none"> <li>Details of the London Plan Review have not yet been published. The Council has identified sufficient five year housing land supply and in years six to ten to exceed the strategic dwelling requirement, considering suitability, availability and achievability of sites. It is not considered necessary to allocate further sites.</li> <li>The Council is able to meet its annual housing target without releasing</li> </ul>

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		<p>LBRuT's Housing Land Supply Position is robust. LGC Ltd site should be allocated for mixed-use as this would create the potential for substantial housing delivery on a brownfield site that will assist in circumventing the notably constrained nature of LB Richmond. A mixed use redevelopment would allow for both the retention of a significant, specialised employer within the Borough, alongside a significant addition to the Borough's housing land supply.</p> <p>In the SHMA, full regard should be given to wider housing needs, not just Richmond's.</p> <p>London Plan housing target figure for borough takes into account a constrained land supply position. LB Richmond would benefit from a mixed-use allocation at the site, allowing for the development of a significant quantum of housing, alongside the retention of an important local employer of national significance. To ensure an available, suitable and achievable five year housing land supply can be demonstrated, it is strongly advocated that the LGC site is afforded a mixed-use allocation, whilst also retaining a high level of employment.</p> <p>Refer also to Comment 472 under Site Allocations</p>	<p>industrial land and business parks. Early analysis indicates that for the financial year of 2015/16, in excess of 500 units have been completed, which is well above the current London Plan target of 315 homes per annum.</p>
273	Celeste Giusti, Greater London Authority on behalf of Mayor of London	<p>Welcomes commitment to meeting target but disappointed that Richmond has not attempted to seek to further close the gap between local supply and need. Richmond's SHMA identifies a need of 895-915 homes per annum, excluding any consideration of market signals. Minimum supply targets set out in the Plan should be supplemented with additional housing capacity.</p> <p>London Plan identifies types of locations which are anticipated to provide a substantial increment to housing supply in London: town centres, surplus industrial, commercial and public land and other large sites, especially near transport nodes as well as general intensification and sensitive intensification of residential areas, especially in areas of good public transport accessibility. This should comprise a pro-active and targeted re-appraisal of a borough's SHLAA findings, drawing on scenario tests, supplemented by more local sensitivity testing.</p> <p>The borough will have to satisfy itself it can demonstrate it has looked at all options for housing delivery in order to meet demand and to protect other designated land; consider suitability of site allocations for higher densities. Mayor urges Richmond to find additional housing capacity in order to be in conformity with the London Plan.</p>	<ul style="list-style-type: none"> <li>• The Plan seeks to exceed the London Plan housing target to be in general conformity with the existing London Plan.</li> <li>• Early analysis indicates that for 2015/16, in excess of 500 units have been completed, which is well above the current London Plan target of 315 homes per annum.</li> <li>• However there is limited land supply, and to meet other policy drivers it is considered justified that the Plan places strong emphasis on protecting and, where possible, enhancing the special environment, local character and uniqueness of the borough by recognising the environmental constraints and limits that provide the context for growth in the borough. There is limited supply of locations such as surplus commercial industrial and public land. This is considered in accordance with the NPPF that Plans should meet objectively assessed needs unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits or policies within the NPPF indicate that development should be restricted.</li> <li>• Additional future capacity may come forward through large sites (including potential regeneration at Ham Close and the redevelopment of the Stag Brewery) and will be thoroughly explored through the forthcoming London SHLAA.</li> </ul>
274	Tom Sadler, Bilfinger GVA on behalf of Defence	<p>Draft SHMA concludes that unconstrained demographic need of the Borough would require between 895-915 homes per annum. Policy needs to reflect this objectively assessed need.</p> <p>The draft Plan fails to recognise the role that sites such as Kneller Hall could play</p>	<ul style="list-style-type: none"> <li>• The NPPF sets out that Plans should meet objectively assessed needs unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits or policies within the NPPF indicate that development should be restricted.</li> </ul>

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	Infrastructure Organisation	<p>in meeting identified housing needs, particularly as a Brownfield site in a sustainable location with a large area of land outside the MOL policy designation.</p> <p>Policy needs to clearly state that 315 dwellings target is a minimum, and it needs to acknowledge the need to contribute to the significant London-wide housing needs.</p> <p>Need to make reference and adhere to 'duty to co-operate' with neighbouring boroughs who may not be able to reach their own housing targets.</p> <p>With the incorrect housing needs target set, the plan fails to identify sufficient land supply to meet objectively assessed needs. The Plan (in particular the Strategic Vision and LP22 and LP34) places insufficient weight on the importance of promoting previously developed brownfield sites for housing. Properly investigating and identifying potential available Brownfield land supply (including sites such as Kneller Hall) could assist in plugging gaps to ensure housing targets are exceeded in line with NPPF and London Plan policies.</p> <p>There is insufficient evidence to justify the affordable housing requirement set out in LP36 and further viability assessments are required to justify the targets.</p>	<ul style="list-style-type: none"> <li>• The Plan seeks to exceed the London Plan housing target to be in general conformity with the existing London Plan.</li> <li>• A Duty to Cooperate Statement accompanies the Publication Plan but it is a duty relating to plan preparation, which does not need to be referred to in the Plan.</li> <li>• The spatial strategy is clear in terms of prioritising and developing on developing brownfield land, as the majority of sites identified in the future housing land supply are brownfield sites.</li> <li>• The Council's view is that due to the significant affordable housing needs this should be addressed through contributions from all residential proposals. A Whole Plan Viability Assessment accompanies the Publication Plan.</li> </ul>
275	Strategic Planning Team, Royal Borough of Kingston	<p>Regulation 18 consultation is premature given the conclusions of the draft SHMA. Draft SHMA concludes that unconstrained demographic-based need for housing in the Borough is for around 895-915 dwellings per annum in the 2014 - 2033 period, which is significantly higher than the current housing target (315 dwellings per annum).</p> <p>Concern that a failure to address any unmet housing need may result in additional pressures on neighbouring local authorities, including the Royal Borough of Kingston upon Thames.</p> <p>Question why consideration has not been made as to how intend to address this housing need given the preparation of new evidence, e.g. review open and green spaces, produce SHLAA or is a subsequent review of the Local Plan being considered if the current draft Local Plan is adopted?</p> <p>'Rationale and scope for review' referred to a separate paper setting the context for the borough SHMA. Need to inform RBK when this paper is published.</p>	<ul style="list-style-type: none"> <li>• The Council has identified sufficient five year housing land supply and in years six to ten to exceed the strategic dwelling requirement. The Plan seeks to exceed the London Plan housing target, however it is considered that a realistic approach needs to take account of limited land supply and be consistent with past trends. Across the London Plan area additional capacity is being identified to meet the strategic need for housing across London. Additional future capacity may come forward through large sites and will be thoroughly explored through the forthcoming London SHLAA. This is considered consistent with the NPPF that Plans should meet objectively assessed needs unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits or policies within the NPPF indicate that development should be restricted. The Council has not requested for Kingston to take part of this need, although Duty to Cooperate discussions continue.</li> </ul>
276	Emily Vyse, Brooke Smith Planning on behalf of Ancient Order of Forester's Friendly Society Ltd	<p>Question whether housing delivery is capable of being met without the release of employment land as despite housing land being identified, there can be no guarantee that the identified sites will come forward for residential purposes.</p> <p>Need to consider Brexit implications on housing development.</p> <p>Support for recognition that housing gain can be achieved on employment land through mixed use schemes, which is a sustainable way to address housing need whilst retaining employment space.</p>	<ul style="list-style-type: none"> <li>• The Council has identified sufficient five year housing land supply and in years six to ten to exceed the strategic dwelling requirement considering suitability, availability and achievability of sites.</li> <li>• The Plan should facilitate development throughout the economic cycle. There is no direct evidence yet of Brexit implications. A Whole Plan Viability Assessment accompanies the Publication Plan.</li> </ul>
		<b>Policy LP 35 Housing Mix and Standards</b>	

Ref No.	Name / Organisation	Summary of response received	Council's response
277	Brian Willman, Chair Ham and Petersham Neighbourhood Forum	"Family sized accommodation" should be defined. The private space allocations in C are too prescriptive - there should be greater flexibility and 70sqm is too high - 50 or 60sqm is adequate for a modern family, while 40sqm might be too high for a small maisonette. [Similarly, the minimum ceiling height of 2.5m in paragraph 9.2.6 is unreasonably high, especially as it depends on the size of the room.]	<ul style="list-style-type: none"> <li>• Defined already in the Glossary.</li> <li>• The Council considers there is flexibility as set out in the supporting text to demonstrate the reasoning for any shortcomings, however the policy seeks to improve standards in new development.</li> </ul>
278	Kevin Goodwin, RPS CgMs for Goldcrest Land	<p>Recommended change:  A. <del>Development should generally provide family sized accommodation, except within the five main centres and Areas of Mixed Use where a higher proportion of small units would be appropriate.</del> The proposed housing mix should be appropriate to the location <del>having regard to the accessibility of the development.</del></p> <p>In light of the recent relevant Court of Appeal Decision and Written Ministerial Statement, part B of the policy and the relevant supporting text should be struck out.</p> <p>The Local Plan should include a policy on Starter Homes.</p>	<ul style="list-style-type: none"> <li>• The Council considers the encouragement of family housing, having regard to location, is appropriate and supported by the SHMA.</li> <li>• This does not outweigh the significant and substantial weight that can be attached to the local evidence of affordable housing need.</li> <li>• Starter Homes will need to be considered alongside affordable housing priorities. At the time of writing, awaiting further details in the Government's Housing White Paper later this year.</li> </ul>
279	Charles Pineles, Planning Spokesman, Richmond Society	Approves the laying down of minimum standards and to generally seek to provide family housing.	Noted.
280	Sarah Stevens, Turleys for British Land	Supports the flexibility provided by Part A which states that the housing mix should be appropriate to the location and will be considered on a site by site basis.	Noted.
281	Celeste Giusti, Greater London Authority on behalf of Mayor of London	<p>Support National Space and access standards and the general approach to supporting a wide range of housing needs.</p> <p>Delete para 9.4.12 as boroughs are required to plan for strategic and local accommodation needs of students.</p> <p>Policy should refer to Richmond's indicative annualised strategic benchmarks for specialist housing for older people set out in Table A5.1 of the London Plan.</p> <p>Reconsider whether proposed amenity policies (proposed New Policy LP8 - 20m distance between windows; and proposed new Policy LP35 - minimum thresholds for gardens), reflect the character across the whole borough and the possibility of providing a more flexible approach to support the delivery of additional housing.</p>	<ul style="list-style-type: none"> <li>• The Council's approach to prioritising local needs is considered realistic giving the competing demands for land, and that planning for strategic student accommodation needs would compromise conventional capacity.</li> <li>• The Council has previously raised concerns about the methodology used and that the benchmark target for specialist housing for older people (135 per annum, of which 105 private, 30 intermediate) corresponds to almost half of the overall housing target and would effectively override other needs which cannot be met due to capacity constraints. The Council's research on extra care and retirement housing review, alongside the SHMA, have been used to inform a balanced approach to meeting needs for different types of housing.</li> <li>• The Council considers it is important to set clear standards for new development, to protect the amenity of existing residents. There is flexibility as set out in the supporting text to demonstrate the reasoning for any shortcomings in an application, when an assessment is made taking into account the particular site characteristics.</li> </ul>

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282	Judith Livesey, NLP Planning on behalf of St Paul's School	Support the need to deliver housing within the Nationally Described Space Standards but should recognise that there may be specific cases where there is justification for not meeting these standards. Sufficient flexibility in the wording on the policy is sought in order to allow delivery of particular specialist forms of housing where it is not advantageous to comply with the national standards without being contrary to the development plan.	<ul style="list-style-type: none"> <li>The Council considers there is flexibility as set out in the supporting text to demonstrate the reasoning for any shortcomings, and the benefits of specialist forms of housing can be considered under the policy supporting Housing Needs of Different Groups.</li> </ul>
		<b>Policy LP 36 Affordable Housing</b>	
283	Tim Catchpole, Planning Representative Mortlake with East Sheen Society	Pleased to see reference to 50% affordable units on sites capable of 10 or more units and to a financial contribution being made on a sliding scale in respect of development of less than 10 units.	Noted.
284	Celeste Giusti, Greater London Authority on behalf of Mayor of London	Discuss with the GLA the Mayor's proposed approach to vacant building credit in order to protect existing employment floorspace and ensure the delivery of housing including affordable.	<ul style="list-style-type: none"> <li>Add reference to vacant building credit, in line with the emerging GLA approach – in London the majority of development is brownfield and does not need to be incentivised, as in many cases the building will only have been made vacant for the sole purpose of re-development.</li> </ul>
285	Caroline Brock, Kew Society	Would like to see specific requirement on affordable housing for economic viability assessments and their appraisal by the Council to be published in full on the Council's website with the planning application so they are available for public scrutiny. A policy should we think also be established for a public review of the viability assessment on completion of the development with additional CIL being payable if the original assessment proves to have been inaccurate by more than 10%.	<ul style="list-style-type: none"> <li>The Council supports transparency. The supporting text already states full public disclosure of financial information should be expected to inform transparent decision-making, and is a requirement of the Local Validation Checklist – add reference to Checklist in supporting text. Recent Information Tribunal decisions will assist the Council in implementation as publishing the information does not impact commercial interests.</li> <li>The supporting text already sets out the circumstances when mechanisms will be sought to allow for a future review; however CIL is a fixed payment governed by separate legislation so there is not scope for an additional CIL payment.</li> </ul>
286	Christian Leigh on behalf of Jane Miller	Objection to any calculation of affordable housing provision on a 'gross' not a 'net' basis. Replacement of an existing house is not 'new' housing development. Provides no detailed justification for the use of a gross figure. This approach stifles new housing provision, e.g. conversion of one dwelling to two flats means a provision towards two affordable dwellings. That is unjust when there is only a net increase of one. Objection is also raised to the provision of affordable housing below the 10 units threshold, in light of policy in the PPG and the Ministerial Statement of November 2014.	<ul style="list-style-type: none"> <li>The Council considers a 'gross' approach does not stifle development, as set out in monitoring evidence. A net approach would reduce the scope and amount of contributions that can be sought, and the Council's view is that due to the significant affordable housing needs this should be addressed through contributions from all residential proposals. If the value of existing residential affects the viability of the scheme then evidence can be presented with an application to justify a lower or nil contribution.</li> <li>The NPPG and WMS do not outweigh the significant and substantial weight that can be attached to the local evidence of affordable housing need.</li> </ul>
287	Brian Willman, Chair Ham and Petersham	Agree with aspiration to provide 50% affordable housing on larger sites, but not with the requirement for an affordable housing contribution on all sites (against PPG).	<ul style="list-style-type: none"> <li>Noted. The Council's view is that due to the significant affordable housing needs this should be addressed through contributions from all residential proposals.</li> </ul>

Ref No.	Name / Organisation	Summary of response received	Council's response
	Neighbourhood Forum	Consider 5 units as a cut-off number. Oppose requirement to make a contribution of any kind for developments of 1 or 2 new units - such a contribution for a very small development is not necessary "to make it acceptable in planning terms". Unclear how paragraph 9.3.12 could operate and disagree with the principle of "claw-back" and the uncertainty that it would cause to developers. Note this policy may need amendment when details of Starter Home and Planning in Principle procedures under the Housing and Planning Act have been published.	<ul style="list-style-type: none"> <li>The approach is consistent with the London Plan and intended to ensure that the maximum public benefit is secured over the period of the development. The details including a cap on the contribution would be agreed as part of any site specific negotiations and set out in a Legal Agreement.</li> <li>At the time of writing, awaiting further details in the Government's Housing White Paper later this year.</li> </ul>
288	Charles Pineles, Planning Spokesman, Richmond Society	The London Plan hands down the 50% requirement, although this will not apply in a number of cases. With the cooling of the housing market it remains to be seen whether such a figure can be attained. The Affordable Contribution Calculator is not the easiest programme to operate and the Society would appreciate a revision in the interests of certainty. Net Deficit in Affordable Housing: at 906 units each year to 2033 this is a question of more than a little urgency. Starter Homes: as is clearly set out, the theory behind starter homes is a complete non-starter in the borough. In sum there are a number of fundamental aspects relating to housing which are under review and we would much appreciate being kept informed as they progress.	<ul style="list-style-type: none"> <li>A Whole Plan Viability Assessment accompanies the Publication Plan. The approach sets a borough-wide strategic target of 50% across all types of sites. The small sites calculation is designed to be site specific and further guidance is in the Affordable Housing SPD.</li> <li>At the time of writing, awaiting further details in the Government's Housing White Paper later this year.</li> </ul>
289	Tanja El Sanadidy, Indigo on behalf of Shepherd Enterprises Limited	Policy is contrary to PPG and recent Court of Appeal decision in seeking contributions on sites below the "threshold of 'capable of ten or more units gross'". The Affordable Housing SPD (March 2014) is out dated and not in line with national policy guidance. Policies LP 25 and LP 41 do not recognise the predominately residential use within the Hampton Wick area, where our client's site is situated. The policies seek to protect an area that has changed significantly, therefore consider Policy LP 25 and LP 41 should reflect the existing character of the area.	<ul style="list-style-type: none"> <li>Local circumstances can justify a different approach. The exceptional local need and evidence base support the continued implementation of the Council's policy on small sites.</li> <li>The Affordable Housing SPD is in accordance with the Council's policy approach.</li> <li>See response to comment 216.</li> </ul>
290	Sarah Dixey, London Borough of Wandsworth	Clarify Part A whether the tenure mix is to be applied to the total number of affordable units or to the total of all housing units -it appear to be ambiguous.	<ul style="list-style-type: none"> <li>The policy continues the Council's approach with a borough-wide strategic target of 50% across all types of sites. Of the 50% affordable units expected, 40% would be rented and 10% intermediate to accord with policy requirements. This could be further clarified in any future update to the Affordable Housing SPD.</li> </ul>
291	Neil Henderson, Gerald Eve on behalf of Reselton Properties Ltd	The Existing Use Value (EUV) approach to assessing benchmark land values ignores the market, is inconsistent with PPG guidelines and is in conflict with paragraph 173 of the NPPF. PPG states that Site Value should reflect policy requirements and planning obligations/any CIL charge; provide a competitive return to willing developers and land owners and be informed by comparable, market-based evidence wherever possible. Where transacted bids are significantly above the market norm, they should not be used as part of this exercise. The idea that a willing landowner would only have regard to the EUV of its land	<ul style="list-style-type: none"> <li>The Council's approach is that in most circumstances the EUV+ <i>should</i> form the primary basis for determining the benchmark land value. This is consistent with the London Housing SPG, the GLA Affordable Housing Toolkit Guidance Notes and the London Borough Development Viability Protocol. As set out in PPG, in all cases land or site value should reflect Development Plan Policies, planning obligations and CIL. As set out in the Housing SPG, recent research by the RICS has identified flaws in the application of the 'Market Value' approach, which explains that 'if market value is based on comparable evidence without proper adjustment to</li> </ul>

Ref No.	Name / Organisation	Summary of response received	Council's response
		<p>is flawed and too singular an approach. A willing seller will not only have regard to the EUV of their land, but they will also have regard to its value for a range of alternative uses (alternative use value I AUV), each carrying a unique set of risks, as well as the value that has been achieved by other landowners in the market for comparable development sites.</p> <p>If a site already benefits from a planning permission or allocation this will also be a consideration. As set out in the RICS GN it is only within this context that an appropriate judgement to what a competitive return for a landowner is can be made.</p>	<p>reflect policy compliant planning obligations, this introduces a circularity, which encourages developers to overpay for sites and try to recover some or all of this overpayment via reductions in planning obligations', which is inconsistent with the requirements of PPG, and creates a scenario where it becomes almost inevitable that policy requirements are found to make a development unviable.</p>
292	Celeste Giusti, Greater London Authority on behalf of Mayor of London	<p>Support priority to maximise the delivery of affordable housing through a range of measures and target that 50% of all housing units will be affordable housing, with a tenure split of 40% housing for rent and 10% intermediate.</p> <p>It is unclear why B(a) applies only to major housing developments and former employment sites. Extend the approach to other land uses which would generally have a lower existing use value such as community uses, where they are appropriate for release.</p> <p>Overall policy is confusing. It firstly sets a clear affordable housing target of 50% (which the Mayor supports), but then says the Council will 'seek the maximum reasonable amount of affordable housing' with reference to viability.</p> <p>Mayor supports Richmond's approach of seeking a contribution towards affordable housing provision from schemes of less than ten units.</p> <p>The Mayor supports the use of Existing Use Value plus a premium in viability assessments.</p>	<ul style="list-style-type: none"> <li>The Council's approach sets a borough-wide strategic target of 50% across all types of sites. A sliding scale on small sites that decreases with a decrease in total number of units proposed (for small site conversions below normal policy requirements and for former employment small sites above normal policy requirements) is considered reasonable to relate to the type and scale of development, bearing in mind viability. Seeking a higher policy requirement from other community uses is not considered realistic as there are few of these types of sites and policies generally seek to protect them for community use.</li> </ul>
		<b>Policy LP 37 Housing Needs of Different Groups</b>	
293	George Burgess, Indigo Planning on behalf of Beechcroft Developments Ltd	<p>The policy should expressly identify housing for identified local need, e.g. for specialist accommodation for the ageing population within the borough. The draft SHMA notes a significant growth in the population in older age groups, particularly over 65s, is expected, and that there is likely to be requirement for additional levels of care/support along with the provision of some specialist accommodation in both the market and affordable sectors. It estimates that some 50-65 units of new provision per annum should be some form of specialist housing for older people.</p>	<ul style="list-style-type: none"> <li>Add reference to the Council's Retirement Housing Review (2016). The Council's research on extra care and retirement housing review, alongside the SHMA, have been used to inform a balanced approach to meeting needs for different types of housing, bearing in mind local priorities and the limited land supply.</li> </ul>
		<b>Policy LP 38 Loss of Housing</b>	
294	Brian Willman, Chair Ham and Petersham Neighbourhood Forum	<p>Concerned that "the suitability of the property and design considerations" (B) are too general and need fuller clarification.</p>	<ul style="list-style-type: none"> <li>The supporting text sets out the detailed considerations on suitability and design that the Council will take into account.</li> </ul>
		<b>Policy LP 39 Infill, Backland and Backgarden Development</b>	

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295	Brian Willman, Chair Ham and Petersham Neighbourhood Forum	Suggest "backland development <b>should</b> reflect" and "the following factors <b>must</b> be addressed" (similarly " <i>should</i> " rather than " <i>must</i> " in the final sentence of this policy - some flexibility is required). Under A3 <i>appropriate</i> is too vague, <i>proportionate</i> might be better. Unsure whether the wording of this policy adequately covers side gardens that adjoin roads (i.e. corner sites). Support the restrictive approach of Backgarden Development.	<ul style="list-style-type: none"> <li>The Council considers "must" reflects the importance of ensuring this type of development takes into account the existing context across the borough, as part of the restrictive approach – support noted. Appropriate garden space would be considered under the policy Housing Mix and Standards.</li> <li>The supporting text states infill development can include side garden plots.</li> </ul>
296	Charles Pineles, Planning Spokesman, Richmond Society	Encourage the policy of retaining spacing between new buildings and seek more insistence on the same in existing townscapes where side extensions tend to form a terracing effect, destroying the homogeneity and spaciousness of the street scene.	<ul style="list-style-type: none"> <li>This policy is aimed at new buildings, although the supporting text states it can be applicable to extensions. Extensions would generally be considered under the policy Local Character and Design Quality. The Council considers there is sufficient guidance within the Plan referring to existing townscape.</li> </ul>
297	Tim Catchpole, Planning Representative Mortlake with East Sheen Society	Concerned about large summerhouse creep in back gardens and is pleased to see this policy.	<ul style="list-style-type: none"> <li>Noted. This policy is aimed at new buildings, although the supporting text states it can be applicable to extensions.</li> </ul>
298	Celeste Giusti, Greater London Authority on behalf of Mayor of London	Consider a less stringent approach to infill and backland development, especially outside of Conservation Areas. The current identified housing capacity would result in a substantial gap between local supply and need.	<ul style="list-style-type: none"> <li>The Council considers it is important that the Plan sets out the importance of compatibility with existing local character given the high quality character and heritage across the borough.</li> </ul>
<b>Chapter 10 – Employment and Local Economy</b>			
299	Charles Pineles, Planning Spokesman, Richmond Society	Would like to see a Proposals Map.	<ul style="list-style-type: none"> <li>Changes to the Proposals Map will be shown in the 'Proposals Map Changes Document' which will be available with the Publication version of the Local Plan.</li> </ul>
<b>Policy LP40 Employment and Local Economy</b>			
300	Sarah Dixey, London Borough of Wandsworth	Wandsworth welcomes Richmond's approach in protecting employment floor space however Richmond's Plan may not demonstrate how the increased demand for office floorspace in the borough will be met given the constraints on large scale development. It may be the case that the borough does not have the capacity to meet its demand, which could impact on neighbouring boroughs. Suggest a review of sites with employment development potential in Richmond.	<ul style="list-style-type: none"> <li>An Employment Land Study is underway to establish a comprehensive, up-to-date and robust evidence base in relation to employment land in the borough. This will be published alongside the Publication version of the Local Plan.</li> </ul>
301	Kevin Scott, Kevin Scott Consultancy Ltd on behalf of	Support Policy LP40, particularly criteria 3 and 4 which encourage flexible and mixed use employment developments.	<ul style="list-style-type: none"> <li>Support noted.</li> </ul>

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	Port Hampton Estates Limited		
302	Helen Harris, Cushman and Wakefield on behalf of Royal Mail Group Ltd	Royal mail are supportive of Policy LP40 which is considered to be sufficiently robust to safeguard Royal Mail properties against residential development which may jeopardise continued business operations (noting that Royal Mail operations tend to take place in insensitive hours with constant movement of delivery vehicles).	<ul style="list-style-type: none"> <li>• Support noted</li> </ul>
303	Emily Vyse, Brooke Smith Planning on behalf of Ancient Order of Forester's Friendly Society Ltd	<p>Disagree that all land in employment use needs to be retained because often B2 uses are often not compatible with residential amenity. Instead, the emphasis should be on mixed use development. This approach would remove physical limitations from a previously developed site and allow the most sustainable and viable scheme. Many industrial sites could be made more efficient across a smaller footprint, so policy should take into account job creation, not just matching floorspace.</p> <p>Industrial sites should not simply be retained for continued use where that use is having adverse effects on the residential environment - this does not demonstrate sustainable development.</p>	<ul style="list-style-type: none"> <li>• The Council has carefully identified existing industrial land and business parks, based on thorough evidence and research, as set out within the Council's borough-wide <a href="#">Assessment of Light Industrial and Storage Stock</a> and <a href="#">Appendices</a>. Therefore, the Council has not adopted a <i>blanket approach</i> to protecting <i>all</i> industrial land and business parks.</li> <li>• The Council's existing research is also supplemented by an update of the Employment Land Study. This research is underway to establish a comprehensive, up-to-date and robust evidence base in relation to employment land in the borough. This is to be published alongside the Publication version of the Local Plan.</li> <li>• It needs to be acknowledged that the borough has a very limited supply of industrial floorspace and demand for this type of land is high. The London Plan states that a 'restrictive' approach towards the transfer of industrial land to other uses should be adopted in the borough, which means that industrial land should not be released for other uses. Therefore, in order to deliver this key priority and strategic objective, locally important industrial land and business parks, which are of particular importance for warehousing, distribution, storage and other industrial employment as well as locally important creative industries and other key employment facilities, are identified in the Local Plan. Any loss of industrial space within these areas will be strongly resisted. This is to ensure that the borough can continue to provide for local business and employment needs.</li> <li>• In addition, the GLA's Industrial Land Supply and Economy Study (2015) demonstrates that the borough has a very limited supply of industrial land, with only 17.3 hectares of general and light industrial space (B2 and B1(c)), and 8.1 hectares of warehousing and storage (B8) facilities; this is amongst the lowest of all the London boroughs. It is expected that the 'restrictive transfer' approach will be retained within the next London Plan. Therefore there is a presumption against loss of any industrial or other such employment space in all parts of the borough, and any loss will be particularly strongly resisted in the listed important industrial land and business parks</li> <li>• The site has been operating successfully as an industrial site for many years</li> </ul>

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			without adverse effects on residents. Any complaints from residents will need to be dealt with as they arise. Whilst transport and noise considerations are of relevance, the Council believes that such issues can be mitigated through appropriate measures, good planning and design. It is not accepted that transport or noise matters are reasons for releasing an industrial site for mixed-use development.
304	Kevin Goodwin, RPS CgMs for Goldcrest Land	Recommended changes to policy LP40 are: 1. Land in employment use should be retained in employment use for business, industrial or storage purposes <b>where possible and where it is viable to continue to do so, subject to environmental and other considerations.</b> 4. Mixed use development proposals <b>should aim to</b> retain, and where possible enhance, the level of existing <b>or past employment levels.</b> I.e. the policy should allow for greater flexibility in relation to re-provision of employment land. It should also consider potential job creation, e.g. replacement of industrial floorspace with office floorspace.	<ul style="list-style-type: none"> <li>The proposed wording for part 1 of policy LP40 would significantly weaken the Council's approach in relation to the retention of employment land. Employment policies within the Plan provide some flexibility and set out criteria where the release of employment land may be considered; however, there is a sequential approach within the policies that the Council requires to be addressed.</li> <li>The proposed wording for part 4 of LP40 will be changed to state that mixed use development 'should' retain existing employment floorspace (see response to comment 307 regarding an inconsistency in the policy wording). Planning policies focus on land use and therefore always measure employment land in terms of <i>floorspace</i>, not current or past employee numbers.</li> <li>Using 'employee numbers' as a measure of employment land would inevitably result in loss of industrial space to office space, which the Council is seeking to avoid. Overall, this borough does not have much employment land when compared to other land uses, such as residential. Therefore, the policy's focus is on the retention of employment land rather than focusing on job numbers.</li> </ul>
305	Tom Sadler, Bilfinger GVA on behalf of Defence Infrastructure Organisation	Broadly agree in principle policy, but plan does not identify any targets for the quantum of employment floorspace required to meet borough needs. Most recent evidence base studies are 'Richmond Employment Sites and Premises' report published in March 2013, and the supplementary 2009 Employment Land Study prepared by URS. Suggest updated studies are undertaken and the relevant policies are updated accordingly to identify how the assessed needs for employment floorspace will be met over the plan period.	<ul style="list-style-type: none"> <li>An Employment Land Study is underway to establish a comprehensive, up-to-date and robust evidence base in relation to employment land in the borough. This will be published alongside the Publication version of the Local Plan.</li> </ul>
306	Janet Nuttall, Natural England	Supportive of the policy approach to direct major new employment development towards Richmond and Twickenham centres which will minimise adverse impacts on the natural environment.	<ul style="list-style-type: none"> <li>Support noted</li> </ul>
307	Jamie Wallace, CgMs on behalf of Notting Hill Home Ownership	Policy LP40 para 1 should not seek long term protection of employment sites; the NPPF states that boroughs should avoid this if there is no reasonable prospect of a site being used for that purpose. The policy should recognise that mixed use development can provide significant employment floorspace. Policy LP40 para 4, which states that mixed use development proposals must	<ul style="list-style-type: none"> <li>The Council's evidence demonstrates that there is a shortage of employment sites in the borough. The Council has carefully identified existing industrial land and business parks, based on thorough evidence and research, as set out within the Council's borough-wide <a href="#">Assessment of Light Industrial and Storage Stock</a> and <a href="#">Appendices</a>.</li> </ul>

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		<p>retain or enhance the level of existing employment floorspace, does not consider viability matters.</p> <p>Policy wording is inconsistent: employment floorspace "must" be retained for mixed use development, but land in employment use "should" be retained in employment use for business, industrial or storage purposes.</p> <p>The following changes are proposed:</p> <p>LP40 Part (1)"Land in employment use should be retained in employment use for business, industrial or storage purposes, unless there is no reasonable prospect of its continued use for employment purposes."</p> <p>LP40 Part (4)"Mixed use development proposals should retain, and where possible enhance, the level of existing employment floorspace, subject to viability matters contained within policy LP 36."</p>	<ul style="list-style-type: none"> <li>• It needs to be acknowledged that the borough has a very limited supply of industrial floorspace and demand for this type of land is high. The London Plan states that a 'restrictive' approach towards the transfer of industrial land to other uses should be adopted in the borough, which means that industrial land should not be released for other uses. Therefore, in order to deliver this key priority and strategic objective, locally important industrial land and business parks, which are of particular importance for warehousing, distribution, storage and other industrial employment as well as locally important creative industries and other key employment facilities, are identified in the Local Plan. Any loss of industrial space within these areas will be strongly resisted. This is to ensure that the borough can continue to provide for local business and employment needs.</li> <li>• In addition, the GLA's Industrial Land Supply and Economy Study (2015) demonstrates that the borough has a very limited supply of industrial land, with only 17.3 hectares of general and light industrial space (B2 and B1(c)), and 8.1 hectares of warehousing and storage (B8) facilities; this is amongst the lowest of all the London boroughs. It is expected that the 'restrictive transfer' approach will be retained within the next London Plan. Therefore there is a presumption against loss of any industrial or other such employment space in all parts of the borough, and any loss will be particularly strongly resisted in the listed important industrial land and business parks.</li> <li>• The Council's existing research is also supplemented by an update of the Employment Land Study. This research is underway to establish a comprehensive, up-to-date and robust evidence base in relation to employment land in the borough. This is to be published alongside the Publication version of the Local Plan.</li> <li>• The local evidence and research therefore demonstrates that the Council's approach is in conformity with the NPPF.</li> <li>• It should be noted that the Council would not seek to retain a site in employment use if robust marketing evidence demonstrates that there is no reasonable prospect of a site being re-used. It is the purpose of the Local Plan and its policies to clearly set out targets and requirements. Where evidence and justification is submitted as part of a planning application, the Council has the ability to consider applying some flexibility to the period of marketing required, but only where this is fully justified. As such, applications are assessed on a site by site basis and the proposed wording for part 1 of the policy is therefore not acceptable.</li> <li>• This site has been operating as an industrial site for many years and any complaints from residents are being dealt with as they arise. Whilst</li> </ul>

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			<p>transport and noise considerations are of relevance, the Council believes that such issues can be mitigated through appropriate measures, good planning and design. It is not accepted that transport or noise matters are reasons for releasing an industrial site for mixed-use development.</p> <ul style="list-style-type: none"> <li>• The inconsistency in the policy wording is noted. Part 4 of policy LP40 will be updated to state that mixed use proposals 'should' retain and where possible enhance employment floorspace.</li> <li>• Viability concerns do not need to be referenced specifically within part 4 of policy LP40; this is assessed on a case by case basis. It should be noted that Section 13 of the Local Plan also deals with viability. Also note that a Whole Plan Viability Assessment accompanies the Publication Plan.</li> </ul>
		<b>Policy LP41 Offices</b>	
308	Heather Mathew, Richmond CVS	Availability and affordability of office space for the voluntary and charitable sector is an issue. Policy should take into account the needs of the voluntary sector when identifying Key Office areas to ensure that the continued loss of office space does not disproportionately affect the voluntary sector.	<ul style="list-style-type: none"> <li>• Part B of policy LP41 seeks to retain low cost office space which will help to meet the needs of the voluntary sector and other users. In addition, Part D.5 requires provision of affordable new office space within major developments which will also help to provide affordable office for the voluntary and charitable sector.</li> <li>• The Key Office Areas will help to retain more office space in the borough and therefore should be beneficial for the voluntary sector.</li> </ul>
309	Celeste Giusti, Greater London Authority on behalf of Mayor of London	Support for approach of protecting and encouraging additional employment floorspace. Mixed-use schemes that would also contribute to Richmond's housing supply should also be encouraged.	<ul style="list-style-type: none"> <li>• Support noted.</li> <li>• Mixed use schemes are encouraged as part of the sequential approach to redevelopment in Part A.2 of policy LP41.</li> </ul>
310	Tanja El Sanadidy, Indigo on behalf of Shepherd Enterprises Limited	Object to designation of Lower Teddington Road as a Key Office Area (because a particular site - 1D Becketts Place - falls within the area). Their own research shows that the area is mixed use with residential, retail and office so should not be designated a Key Office Area.	<ul style="list-style-type: none"> <li>• Lower Teddington Road is an area where we seek to retain office floorspace and therefore the Key Office Area designation will remain.</li> </ul>
311	Tim Catchpole, Planning Representative Mortlake with East Sheen Society	Agree the Key Office Area designations in the Mortlake / East Sheen area.	<ul style="list-style-type: none"> <li>• Support noted.</li> </ul>
312	Emily Vyse, Brooke Smith Planning on	Mixed-use development, including A and C use classes, should be permitted within Key Office Areas. St Margaret's Business Park, which is currently designated as a 'locally important	<ul style="list-style-type: none"> <li>• Mixed-use development is permitted within Key Office Areas as long as there is no net loss off office floorspace.</li> <li>• St Margaret's Business Park contains purpose-built light industrial units</li> </ul>

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	behalf of Ancient Order of Forester's Friendly Society Ltd	<p>industrial and business park', should be added as a Key Office Area instead, or be allocated for mixed use development.</p> <p>The Business Park currently accommodates 7 industrial units and 50 employees. It is surrounded by residential and there is local opposition to the site because it attracts large vehicles which cause great disruption to the residential environment. The physical characteristics of the site also act as a deterrent to industrial occupiers, therefore it is considered illogical to retain the site for industrial use. It is considered that the site should be redeveloped for mixed-use including office space which would achieve employment use on a smaller footprint whilst increasing job numbers.</p>	<p>which are of a good quality therefore it has been designated as locally important industrial land and business park rather than a Key Office Area. The Council's aim is to retain industrial floorspace on this site in order to ensure a balanced economy in the borough and therefore it will not be designated as a Key Office Area or allocated for mixed-use redevelopment.</p> <ul style="list-style-type: none"> <li>The site has been operating successfully as an industrial site for many years without adverse effects on residents. Any complaints from residents will need to be dealt with as they arise. Whilst transport and noise considerations are of relevance, the Council believes that such issues can be mitigated through appropriate measures, good planning and design. It is not accepted that transport or noise matters are reasons for releasing an industrial site for mixed-use development.</li> </ul>
313	Jamie Wallace, CgMs on behalf of Notting Hill Home Ownership	<p>The requirement within policy LP41 for 2 years marketing is considered overly restrictive and not in conformity with the NPPF which seeks to avoid the long term protection of employment sites where there is no reasonable prospect of re-use. A marketing period over 1 year, or the submission of marketing information to justify a lack of occupier demand, should be sufficient.</p> <p>The sequential approach to redevelopment in policy LP41 which prioritises redevelopment for alternative employment uses should be reworded to prioritise a mix of employment and residential development in order to comply with the NPPF emphasis on housing provision. This is considered to be especially important on ageing employment sites such as St Clare Business Park where residential development will be required to enable the delivery of new employment floorspace.</p> <p>The following changes should be made to the policy:  LP41 Part 1" Robust and compelling evidence is provided which clearly demonstrates that there is no longer demand for an office based use in this location and that there is not likely to be in the foreseeable future. This must include evidence of completion of a full and proper marketing exercise of the site at realistic prices both for the existing office use or an alternative office-based use completed over a minimum period of six continuous months in accordance with the approach set out in Appendix 5 or the provision of market evidence to demonstrate a lack of demand in the locality;"  LP41 Part 2 (a)"Redevelopment of mixed use proposals including residential and employment uses, balanced together with the level of affordable housing provision in accordance with policy LP 36 Affordable Housing and viability considerations."</p>	<ul style="list-style-type: none"> <li>The Council's evidence demonstrates that there is a shortage of employment sites in the borough; therefore the two year marketing period will be retained in order to ensure all possibilities for re-using sites for employment uses are considered. This has been a long-standing approach within Richmond's employment policy and is consistent with other London boroughs. Six months marketing or a statement demonstrating lack of demand would not be sufficiently robust in policy terms and would not enable the Council to retain a balanced economy in the borough with a variety of employment options. It should be noted that it is the purpose of the Local Plan and its policies to clearly set out targets and requirements. Where evidence and justification is submitted as part of a planning application, the Council has the ability to consider applying some flexibility to the period of marketing required, but only where this is fully justified.</li> <li>For the same reasons, the sequential approach emphasises retention of employment land before mixed-use development in order to ensure a strong local economy.</li> <li>Applications are assessed on a site by site basis and some enabling residential development may be acceptable in some instances in order to support the delivery of new employment floorspace.</li> <li>Also see response to comment 307 above.</li> </ul>
		<b>Policy LP42 Industrial Land and Business Parks</b>	
314	Kevin Goodwin, RPS CgMs for	Recommended changes in respect of 'Locally important industrial land and business parks' are: a. loss of industrial floorspace will be resisted unless <b>similar</b>	<ul style="list-style-type: none"> <li>Planning policies focus on land use and therefore always measure employment land in terms of <i>floorspace</i>, not existing or potential jobs.</li> </ul>

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	Goldcrest Land	<p>levels of potential jobs are re-provided; d. proposals for mixed use development including other employment generating uses will be considered.</p> <p>Sandycombe Centre should be removed from the list of 'Locally important industrial land' as it is no longer a suitable employment site. It has been marketed with no interest for two years and should now be considered suitable for residential development.</p>	<p>Using 'employee numbers' as a measure of employment land would inevitably result in loss of industrial space to office space, which the Council is seeking to avoid.</p> <ul style="list-style-type: none"> <li>• The Council has carefully identified existing industrial land and business parks, based on thorough evidence and research, as set out within the Council's borough-wide <a href="#">Assessment of Light Industrial and Storage Stock</a> and <a href="#">Appendices</a>.</li> <li>• The Council's existing research is also supplemented by an update of the Employment Land Study. This research is underway to establish a comprehensive, up-to-date and robust evidence base in relation to employment land in the borough. This is to be published alongside the Publication version of the Local Plan.</li> <li>• It needs to be acknowledged that the borough has a very limited supply of industrial floorspace and demand for this type of land is high. The London Plan states that a 'restrictive' approach towards the transfer of industrial land to other uses should be adopted in the borough, which means that industrial land should not be released for other uses. Therefore, in order to deliver this key priority and strategic objective, locally important industrial land and business parks, which are of particular importance for warehousing, distribution, storage and other industrial employment as well as locally important creative industries and other key employment facilities, are identified in the Local Plan. Any loss of industrial space within these areas will be strongly resisted. This is to ensure that the borough can continue to provide for local business and employment needs.</li> <li>• In addition, the GLA's Industrial Land Supply and Economy Study (2015) demonstrates that the borough has a very limited supply of industrial land, with only 17.3 hectares of general and light industrial space (B2 and B1(c)), and 8.1 hectares of warehousing and storage (B8) facilities; this is amongst the lowest of all the London boroughs. It is expected that the 'restrictive transfer' approach will be retained within the next London Plan. Therefore there is a presumption against loss of any industrial or other such employment space in all parts of the borough, and any loss will be particularly strongly resisted in the listed important industrial land and business parks.</li> <li>• Therefore, proposed criteria d within part B of policy LP42 cannot be taken forward as it would undermine the aim and purpose of this policy. The aim of the locally important industrial land and businesses parks is to retain industrial floorspace and avoid redevelopment for mixed-use in these areas particularly introducing residential uses that are unlikely to be compatible with industrial uses. Mixed-use redevelopment may be</li> </ul>

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			<p>permitted in industrial land outside of the designated areas as per part A.2.b of Policy LP42, but not within the designated areas.</p> <ul style="list-style-type: none"> <li>At this stage, the Council continues to identify Sandycombe Centre as a 'locally important industrial land'. However, it should be noted that the Council would not seek to retain a site in employment use if robust marketing evidence demonstrates that there is no reasonable prospect of a site being re-used. It is the purpose of the Local Plan and its policies to clearly set out targets and requirements. Where evidence and justification is submitted as part of a planning application, the Council has the ability to consider applying some flexibility to the period of marketing required, but only where this is fully justified. As such, applications are assessed on a site by site basis and the proposed wording for part 1 of the policy is therefore not acceptable. In the context of Sandycombe Centre, it is noted that there is no extant planning permission for this site.</li> </ul>
315	Tim Catchpole, Planning Representative Mortlake with East Sheen Society	<p>Note that no Industrial Land and Business Parks have been designated in Mortlake / East Sheen. Ents are very high in this area and there is concern about the absence of service industry in this area.</p>	<ul style="list-style-type: none"> <li>The Council has carefully identified existing industrial land and business parks, based on thorough evidence and research, as set out within the Council's borough-wide <a href="#">Assessment of Light Industrial and Storage Stock</a> and <a href="#">Appendices</a>. Mortlake and East Sheen do not contain industrial areas of a sufficient size to allow the Council to identify 'locally important industrial land and business parks' in this area.</li> <li>The redevelopment of the Stag Brewery in Mortlake (site allocation SA23) will contain employment uses which the Council envisages to support local service industries.</li> </ul>
316	Emily Vyse, Brooke Smith Planning on behalf of Ancient Order of Forester's Friendly Society Ltd	<p>Objection to designation of land at St Margaret's Business Centre as 'Industrial Land and Business Park'. The existing use is contentious amongst local residents and mixed use development comprising office (B1) and residential (C3) is considered to be more appropriate.</p> <p>A presumption against the loss of industrial land within the Borough is not appropriate and the requirement to replace industrial floorspace is unrealistic and does not constitute sustainable development. Higher job numbers can be provided across a smaller footprint in other types of employment uses. The justification for industrial land and business park loss should therefore be considered against other factors, rather than being limited to matching floorspace.</p> <p>2 years is considered an inappropriately long marketing period. The wider context should be taken into consideration and each site assessed on its own merits, particularly considering the social, economic and environmental gains that could be achieved through redevelopment, when compared against the social, economic and environmental benefits of retaining the industrial use.</p>	<ul style="list-style-type: none"> <li>The Council has carefully identified existing industrial land and business parks, based on thorough evidence and research, as set out within the Council's borough-wide <a href="#">Assessment of Light Industrial and Storage Stock</a> and <a href="#">Appendices</a>. St Margaret's Business Park contains purpose-built light industrial units which are of a good quality; therefore it has been identified as a locally important industrial land and business park. The Council aims to retain industrial floorspace on the St Margaret's Business Park site in order to ensure a balanced economy in the borough and therefore it will not be allocated for mixed-use development.</li> <li>Richmond borough is designated as 'restrictive transfer' in the London Plan which means that industrial land should not be released for other uses. In addition the Council's own evidence demonstrates a shortage of industrial sites in the borough. Therefore the presumption against the loss of industrial sites in the identified areas is justified.</li> <li>Planning policies focus on land use and therefore always measure employment land in terms of <i>floorspace</i>, not current or past employee numbers. Using 'employee numbers' as a measure of employment land</li> </ul>

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			<p>would inevitably result in loss of industrial space to office space, which the Council is seeking to avoid. The Council needs to retain all types of employment land, including industrial, to support a strong and diverse local economy.</p> <ul style="list-style-type: none"> <li>The two year marketing period will be retained in order to ensure all possibilities for re-using sites for employment uses are considered. This has been a long-standing approach within Richmond's employment policy and is consistent with other London boroughs. Sites will always be considered on their own merits with the benefits of retaining industrial / employment uses to support the local economy will be weighed up against the other components of sustainable development. In this context, it should be noted that it is the purpose of the Local Plan and its policies to clearly set out targets and requirements. Where evidence and justification is submitted as part of a planning application, the Council has the ability to consider applying some flexibility to the period of marketing required, but only where this is fully justified.</li> </ul>
317	James Sheppard, CBRE on behalf of LGC Ltd	See comment 472 under Site Allocations below	N/A
318	Alison Mackay, Colliers on behalf of Greggs Plc	<p>Objection to the designation of the 'West Twickenham cluster (including Greggs Bakery and surroundings), Twickenham' as Locally Important Industrial Land'. This is considered unsound as it is not justified, effective or consistent with the NPPF which states that "planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for this purpose"</p> <p>Also object to the restrictive nature of the wording contained in Policy LP42. The Greggs site is no longer fit for purpose for continued operation because of long-standing physical and financial constraints of the site including a fractious relationship with neighbours. Greggs is now moving its operations at the end of 2016 to a centralised production base in larger, more suitable premises outside the borough. Greggs is therefore of the opinion that the long-term industrial operation of the site is unacceptable from both a business and community perspective. The future approach should not therefore include any industrial uses. This conclusion is supported by the Borough's own assessment of industrial sites prepared earlier in 2016, which describes the site as being of 'fair' quality. Greggs have provided an analysis the Borough's evidence base documents relating to employment land. They suggest there are gaps in the Council's evidence base, a lack of transparency and an absence of logic chain which fails to meet the London Plan requirement for locally significant industrial sites to be</p>	<ul style="list-style-type: none"> <li>The Council has carefully identified existing industrial land and business parks, based on thorough evidence and research, as set out within the Council's borough-wide <a href="#">Assessment of Light Industrial and Storage Stock</a> and <a href="#">Appendices</a>.</li> <li>It needs to be acknowledged that the borough has a very limited supply of industrial floorspace and demand for this type of land is high. The London Plan states that a 'restrictive' approach towards the transfer of industrial land to other uses should be adopted in the borough, which means that industrial land should not be released for other uses. Therefore, in order to deliver this key priority and strategic objective, locally important industrial land and business parks, which are of particular importance for warehousing, distribution, storage and other industrial employment as well as locally important creative industries and other key employment facilities, are identified in the Local Plan. Any loss of industrial space within these areas will be strongly resisted. This is to ensure that the borough can continue to provide for local business and employment needs.</li> <li>Richmond borough is designated as 'restrictive transfer' in the London Plan which means that industrial land should not be released for other uses. In addition the Council's own evidence demonstrates a shortage of industrial sites in the borough. Therefore, in order to support a strong and diverse</li> </ul>

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		<p>designated on the basis of robust evidence, and therefore believe the proposed approach is not justified.</p> <p>Greggs have also prepared a Transport Statement and a Noise Assessment, both of which suggest that the site is not appropriate for continued industrial use. A further report by Colliers International suggests that the site is not suitable or likely to come forward as an industrial redevelopment scheme, therefore the proposed allocation is undeliverable.</p> <p>Poorer scoring sites in the ESP should be allocated for mixed use development, including providing employment floorspace for start-up and creative business uses space (with a focus on B1 a, b and c use). This would be a sensible future use for the Greggs site, given the constraints and amenity issues. A mixed-use residential and commercial scheme is considered the most appropriate use of the site (as per the wording of the previous Draft Site Allocations Plan). This has the potential to either maintain or increase the number of employees at the site and contribute to meeting housing need.</p>	<p>local economy with a variety of employment opportunities, the Council aims to retain industrial uses on the Gregg's Bakery site. The site only announced its closure in 2016 so cannot be considered a site where there is 'no reasonable prospect' of re-use as marketing has not yet even begun (or is in very early stages).</p> <ul style="list-style-type: none"> <li>• In addition, the GLA's Industrial Land Supply and Economy Study (2015) demonstrates that the borough has a very limited supply of industrial land, with only 17.3 hectares of general and light industrial space (B2 and B1(c)), and 8.1 hectares of warehousing and storage (B8) facilities; this is amongst the lowest of all the London boroughs. It is expected that the 'restrictive transfer' approach will be retained within the next London Plan. Therefore there is a presumption against loss of any industrial or other such employment space in all parts of the borough, and any loss will be particularly strongly resisted in the listed important industrial land and business parks.</li> <li>• Greggs has operated successfully from this site for many years and therefore the site is not considered to be inherently unsuitable for continued industrial use from a business or a community perspective. Whilst transport and noise considerations are of relevance, the Council believes that such issues can be mitigated through appropriate measures, good planning and design. It is not accepted that transport and noise matters are reasons for releasing an industrial site for mixed-use development.</li> </ul>
319	Caroline Wilberforce, Indigo Planning on behalf of on behalf of Sharpe Refinery Service	<p>'Twickenham Film Studios and Arlington Works, St Margarets' is designated as a locally important industrial land and business park. However the map on P270 of the proposed boundary includes only Twickenham Film Studios, not Arlington Works. It is requested that 'Arlington Works' is removed from the proposed allocation title and not included in the designation.</p> <p>If however the Council is minded to allocate Arlington Works for development, the site should be subject to a separate allocation for residential led, mixed use development. This should be separate to Twickenham Film Studios because the nature of the two uses differs significantly. It is also noted that there is no direct reference to the requirement for oil storage and refinery uses within the borough in the Council's evidence base.</p> <p>The allocation should be for mixed use redevelopment because the existing use of the site as an oil refinery is not suitable for its current location because odours and noise pollution from the plant impact negatively on residential amenity. The site also has poor access with narrow roads which are unsuitable for oil tankers. The existing buildings are in poor condition and unsuitable for other types of employment uses. Due to the cost of land remediation, a mixed use</p>	<ul style="list-style-type: none"> <li>• Arlington Works was incorrectly included within the title of the proposed designation and will be removed from the designation.</li> <li>• Arlington Works is a Safeguarded waste site, to which policies in the West London Waste Plan (WLWP) will apply: <a href="http://www.wlwp.net/adoption-of-theplan.html">http://www.wlwp.net/adoption-of-theplan.html</a> - see listing in Appendix 2 of the WLWP.</li> </ul>

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		development or solely residential development is considered to be the only financially viable option to redevelop the site.	
320	Jamie Wallace, CgMs on behalf of Notting Hill Home Ownership	<p>St Clare Business Park is identified as 'locally important industrial land and business park'. However the site has limited potential for continued use for industrial or storage uses because the existing stock is of poor quality with a high vacancy rate, constrained access and servicing arrangements, and in close proximity to the surrounding residential properties. The policy wording of LP42 needs to reflect these instances to ensure employment space can be reduced where required to deliver an appropriate mixed use redevelopment.</p> <p>In order for the redevelopment of the St Clare site to offer an appropriate quantum and type of employment floorspace which can meet modern needs and be viable, an element of residential development would be required.</p> <p>Given the location of the St Clare site within Hampton Hill town centre, mixed use development would be more appropriate than large scale employment, which should be directed to Richmond and Twickenham centres (as outlined in LP40). An element of residential would help achieve the Boroughs Housing Needs targets.</p> <p>The marketing period of 2 years required under part A of policy LP42 is considered to be too onerous; 6 months, or a maximum of 1 year, is considered a more appropriate period of time.</p> <p>The sequential test set out in criteria 2 of Policy LP 42 identifies that redevelopment should be for office or mixed use including other employment uses. It is considered that reference to the inclusion of residential uses should be included as a priority as part of any redevelopment.</p> <p>Part B(a) of Policy LP 42 is considered to be overly restrictive and an exception should be included.</p> <p>The following changes should be made to the wording of policy LP42:</p> <p>LP42 Part A (1)"Robust and compelling evidence is provided which clearly demonstrates that there is no longer demand for an industrial based use in this location and that there is not likely to be in the foreseeable future. This must include evidence of completion of a full and proper marketing exercise of the site at realistic prices both for the existing use or an alternative industrial use completed over a minimum period of six continuous months in accordance with the approach set out in Appendix 5 or the provision of market evidence to demonstrate a lack of demand in the locality."</p> <p>LP42 Part B (a)"Loss of industrial floorspace will be resisted unless the reduction in floorspace can be justified in relation to vacancy levels, assessment of market demand and part re-provision as part of a residential mixed use development in accordance with part (d)."</p> <p>LP42 Part B - addition of category (d)"Mixed use re-development including an</p>	<ul style="list-style-type: none"> <li>• St Clare Business Park will retain its designation as a locally important industrial land and business park. It is a key site for the Council for the long term provision of warehousing, distribution, storage and other industrial employment as well as creative industries and other key employment facilities. We need to retain the industrial space at St Clare to retain a balanced economy in the borough with a variety of employment options. It is recognised that some enabling development may be required as part of any future redevelopment in order to re-provide adequate industrial employment floorspace on the site.</li> <li>• The two year marketing period will be retained in order to ensure all possibilities for re-using sites for employment uses are considered. This has been a long-standing approach within Richmond's employment policy and is consistent with other London boroughs. Six months marketing or a statement demonstrating lack of demand would not be sufficiently robust in policy terms and would not enable the Council to retain a balanced economy in the borough with a variety of employment options. It should be noted that it is the purpose of the Local Plan and its policies to clearly set out targets and requirements. Where evidence and justification is submitted as part of a planning application, the Council has the ability to consider applying some flexibility to the period of marketing required, but only where this is fully justified.</li> <li>• The additional text suggested within Part B of policy LP42 would significantly weaken the policy approach, which aims to retain land in industrial use. Part B of policy LP42 purposely excludes any reference to mixed-use redevelopment because we are seeking to retain these important industrial spaces in industrial use. Mixed-use redevelopment may be permitted in industrial land outside of the designated industrial land and employment parks as per part A.2.b of Policy LP42, but not within the designated areas, therefore the suggested wording cannot be taken forward.</li> <li>• Also see response to comment 307 above.</li> </ul>

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		element of replacement improved employment floorspace and residential accommodation, subject to market evidence in accordance with part (a)."	
		<b>Policy LP43 Visitor Economy</b>	
321	Caroline Brock, Kew Society	Include National Archives on Main Features map & in list in para 3.1.16 & policy LP 43. Policy to include reference to the need for providing funding for visitor assistance.	<ul style="list-style-type: none"> <li>The list of tourist attractions provides examples and is not exhaustive. It is not considered necessary to add the National Archives to the map, in order to maintain legibility.</li> <li>The need to improve the visitor experience is covered in points 1 and 4 of Subsection A of the policy. Commitments to funding are not matters for the Local Plan.</li> </ul>
322	Charles Pineles, Planning Spokesman, Richmond Society	Note change of tone in policy from consolidation to growth. Support for growth in hotels to be in step with transport availability.	<ul style="list-style-type: none"> <li>Noted.</li> </ul>
323	Tom Sadler, Bilfinger GVA on behalf of Defence Infrastructure Organisation	Need for additional hotel accommodation acknowledged. Plan should make reference to the number of bedrooms needed over the plan period. Suggest an up-to-date Visitor Economy Study is prepared.	<ul style="list-style-type: none"> <li>Supporting text to include a reference to potential requirement for bedrooms included in the 2012 Roger Tym/PBA Hotel Study.</li> </ul>
324	James Togher, Environment Agency	Teddington Lock should be added as a key tourist attraction. Value of River Thames as a waterway for river users acknowledged. Specific wording suggested.	<ul style="list-style-type: none"> <li>The list is tourist attractions provides examples and is not exhaustive.</li> </ul>
325	Sarah Stevens, Turleys for British Land	Support for policy to provide new visitor accommodation in accessible locations.	Noted.
326	Rachel Botcherby, Planning Advisor, London and South East National Trust	Support for policy	Noted.
		<b>Chapter 11 –Transport</b>	
327	Teresa Gonet, Highways Agency	No comments	Noted.
		<b>LP 44 Sustainable Travel Choices</b>	
328	Eliza Shaw	Cycling and walking need to be embedded as a means of transport for all areas of the borough; need to provide safe infrastructure and recognise that advisory and marketing programmes will not increase the rates of cycling or walking in	<ul style="list-style-type: none"> <li>The Council considers that cycling and walking are sufficiently covered in the Local Plan. They are part of the strategic vision, strategic objectives as well as the spatial strategy. There are references to cycling and walking</li> </ul>

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		the borough.	<p>throughout the Plan, such as within the Green Infrastructure, Social and Community Infrastructure and Public Open Space, Play Space, Sport and Recreation policies, and importantly within the Health and Wellbeing policy. Emphasis on cycling and walking is covered in detail in Policy LP44 and cycle parking standards and related facilities are covered within Policy LP45.</p> <ul style="list-style-type: none"> <li>It should be noted that this is the Local Plan and not the borough's cycling strategy or Local Implementation Plan for Transport. For information, the Council is carrying out a public consultation on the borough's Cycling Strategy in the autumn of 2016: <a href="https://consultation.richmond.gov.uk/environment/cycling">https://consultation.richmond.gov.uk/environment/cycling</a></li> </ul>
329	Eliza Shaw	Consider pedestrianisation George Street and the Quadrant in Richmond borough	<ul style="list-style-type: none"> <li>This is not a matter for the Local Plan and should be considered as part of other Council strategies, such as the Local Implementation Plan for Transport. Comments will be passed to the Council's Transport and Highways department.</li> </ul>
330	Eliza Shaw	Car parking in town centres is not essential to their vitality; the Council has no evidence to support this, including the 30 min free parking, which removes emphasis on other ways to access town centres.	<ul style="list-style-type: none"> <li>It should be noted that para 40 of the NPPF sets out that local authorities should seek to improve the quality of parking in town centres so that it is convenient, safe and secure, including appropriate provision for motorcycles. In addition, local authorities should set appropriate parking charges that do not undermine the vitality of town centres. Parking enforcement should be proportionate. Furthermore, the Ministerial Statement published in March 2015 by the then Secretary of State sets out that this government is keen to ensure that there is adequate parking provision both in new residential developments and around our town centres and high streets. No change.</li> </ul>
331	Brian Willman, Chair Ham and Petersham Neighbourhood Forum	<p>Specific cycling network proposals and public realm improvements will be included in the emerging Ham and Petersham Neighbourhood Plan (HPNP). This will also support a new cycle and pedestrian river crossing and ferry services, including the appropriate infrastructure, which are referred to in the LBRuT draft Local Plan.</p> <p>LP 44 B: clarify the use of 'appropriate' i.e. when it is not 'appropriate' to design new development to support walking and cycling. The emerging HPNP establishes that it is appropriate for development in Ham and Petersham to provide cycling routes and good pedestrian environments including supporting routes beyond the development site.</p> <p>LP 44 B 11.2.4: Designing streets to reduce traffic speeds and improve pedestrian environments might also be referred to here.</p> <p>LP 44 F: To appropriately safeguard the land for local sustainable travel (walking and cycling) networks, proposals should be identified and the relevant proposal documents cited, including the emerging HPNP.</p>	<ul style="list-style-type: none"> <li>The reference to 'where appropriate' has been included to acknowledge that not all development proposals will have the opportunity to maximise permeability and include cycling routes, for example householder extensions. However, to provide clarity, the reference to 'where appropriate' is removed as maximising permeability and providing cycling/walking infrastructure will be assessed on a case by case basis.</li> <li>Reducing traffic speeds and other measures to improve pedestrian environments are not matters for the Local Plan. However, these will be addressed in the Local Implementation Plan for Transport.</li> <li>In relation to LP 44 F, it is not considered appropriate to refer to detailed projects within the Local Plan given that its role is to set out the long term planning framework to influence new development. The Infrastructure Delivery Plan and Infrastructure Delivery Schedule as well as the Local Implementation Plan for Transport set out details on infrastructure requirements, including transport specific proposals.</li> </ul>

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		11.1.6 Important to retain reference of not permitting gated developments (in addition to LP1).	<ul style="list-style-type: none"> <li>The Local Plan and its policies need to be read as a whole. It is therefore considered that not permitting gated developments is sufficiently covered in other policies; this is to avoid lots of cross-references and repetition within the Plan.</li> </ul>
332	Cllr Martin Elengorn, Environment Spokesperson Richmond upon Thames Liberal Democrat Councillors Group	Chapter 11 Transport: In line 3 - after "pollution" add " carbon emissions"	<ul style="list-style-type: none"> <li>Agreed</li> </ul>
333	Andrew Dorrian, Transport for London	<p>Crossrail 2 – Hybrid Bill in 2019. The current route alignment would directly serve four stations within the Borough (Hampton Wick, Hampton Teddington, Fulwell)</p> <p>The scheme is not yet committed; it is expected that safeguarding will be updated for the route during 2017 and therefore the Local Plan would benefit from Crossrail 2 being shown on the Key Diagram.</p> <p>TfL would also welcome Borough support for the scheme.</p> <p>Crossrail 2 will not be operational until 2033 (the current end date of the Local Plan), but there is evidence from similar transport schemes that suggests development benefits may be realised ahead of this. A pro-active approach to optimising development capacity within the vicinity of Crossrail 2 stations ahead of its opening would therefore be welcomed.</p> <p>Haringey have a policy in their emerging plan which actively encourages scrutiny of sites within 1km of Crossrail 2 stations and Richmond could take a similar approach.</p>	<ul style="list-style-type: none"> <li>Comments in relation to Crossrail 2 are noted. It is acknowledged that there is proposed to be a Hybrid Bill in 2019. The Council is also aware that a planned autumn consultation into Crossrail 2 has been pushed back until TfL can provide an updated business case and funding plan. To date, there are no updated proposals available for Crossrail 2 which could inform the Local Plan.</li> <li>It is acknowledged that Crossrail 2, in line with the previous consultation proposals, could change the public transport accessibility of the areas in close proximity to the proposed stations of Hampton Wick, Hampton, Teddington and Fulwell. However, the proposals are not confirmed yet and there is no funding plan in place. It also needs to be recognised that there is very limited land supply in this borough, and due to the context and local character surrounding the above mentioned stations, it is unlikely that there will be any significant growth in those areas.</li> <li>At this point in time, it is not proposed to include a policy on Crossrail 2 within the Local Plan. It is assumed that further discussions around Crossrail 2 will take place between Transport for London and its partners, including Local Authorities. The Council will consider including a policy on Crossrail 2 within the Local Plan and the appropriate time, such as through a partial review of the transport policies.</li> <li>The Spatial Strategy and the policies of the Local Plan identify opportunities for development to come forward by optimising the use of sites, particularly in centres with good public transport accessibility that would be along transport corridors or around transport nodes. However, as mentioned above, there is limited land supply and other policies need to be addressed in the Plan.</li> <li>It is assumed that the new London Plan will address the delivery and</li> </ul>

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			safeguarding of sites and routes for Crossrail 2 and other strategic infrastructure projects, and that discussions will take place between the Mayor of London, Transport for London and its partners, including Local Authorities, as part of any negotiations on Crossrail 2. However, at this stage, it is considered that Crossrail 2 isn't far enough advanced to be included in the Local Plan.
334	Jenine Langrish	Council needs to commit to creating network of safe cycling routes, including investment to deliver them.	<ul style="list-style-type: none"> <li>The Council considers that cycling is sufficiently covered in the Local Plan by virtue of being part of the strategic vision, strategic objectives as well as the spatial strategy. There are references to cycling throughout the Plan, such as within the Green Infrastructure, Social and Community Infrastructure and Public Open Space, Play Space, Sport and Recreation policies, and importantly within the Health and Wellbeing policy. Emphasis on cycling and walking is covered in detail in Policy LP44 and cycle parking standards and related facilities are covered within Policy LP45.</li> <li>It should be noted that this is the Local Plan and not the borough's cycling strategy or Local Implementation Plan for Transport. For information, the Council is carrying out a public consultation on the borough's Cycling Strategy in the autumn of 2016: <a href="https://consultation.richmond.gov.uk/environment/cycling">https://consultation.richmond.gov.uk/environment/cycling</a></li> <li>Funding and investment are not matters for the Local Plan.</li> </ul>
335	Tim Lennon, Borough Coordinator Richmond Cycling Campaign	In LP44, section B, it is not sufficient to say 'where appropriate' for permeability by walking and cycling. These should be the primary methods of access, and should be prioritised as such.	<ul style="list-style-type: none"> <li>The reference to 'where appropriate' has been included to acknowledge that not all development proposals will have the opportunity to maximise permeability and include cycling routes, for example householder extensions. However, to provide clarity, the reference to 'where appropriate' is removed as maximising permeability and providing cycling/walking infrastructure will be assessed on a case by case basis.</li> </ul>
336	Lucy Owen, Port of London Authority	It is recommended to widen the wording of policy LP44 to include reference to supporting new infrastructure and to piers / landing stages.	<ul style="list-style-type: none"> <li>Agreed. Add reference to new infrastructure in policy LP 44 (Part E.)</li> </ul>
337	Caroline Brock, Kew Society	Cross-refer to policies on schools and transport plans to minimise traffic	<ul style="list-style-type: none"> <li>The Local Plan and its policies need to be read as a whole and one of the aims of the Local Plan Review is to streamline policies and therefore avoid lots of cross-references and repetition within the Plan.</li> </ul>
338	Myrna Jelman	Need for public transport improvements; train journeys are grossly overcrowded; Sheen road is deprived of direct buses to the station.	<ul style="list-style-type: none"> <li>The Council is not the provider of public transport services, however, it should be noted that policies in the Plan, including in particular Policy LP 44 Sustainable Travel Choices, ensure that major new developments maximise opportunities to provide safe and convenient access to public transport services, and the Council will work in partnership with providers such as Transport for London to achieve improvements.</li> </ul>
339	William Mortimer	Need to strengthen emphasis on river transportation which can carry huge loads with little pollution, but recognise that waterway is a shared resources; safety of	<ul style="list-style-type: none"> <li>River Transport is already sufficiently covered in Part E of policy LP 44 Sustainable Travel Choices.</li> </ul>

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		boat crew using river for recreation purposes must be preserved. Telecommunication provisions on a catamaran service should be improved and area set aside for people to work on-board the journey time into the City, which could be used by commuters productively, and take stress out of road transportation.	<ul style="list-style-type: none"> <li>Telecommunication services on riverboat services are not matters for the Local Plan.</li> </ul>
340	Andrew Dorrian, Transport for London	TfL requests a reference to Taxis within policy LP44. Ensure that taxis and private hire vehicles are adequately catered for in appropriate locations (e.g. stations, town centres and hotels) The TfL Ranks Action Plan (2015) should be referred to when planning for taxi provision.	<ul style="list-style-type: none"> <li>Agreed. A new sub-section to policy LP 44 (G.) is proposed, including relevant wording in the supporting text.</li> </ul>
341	Helene Jelman	Need for public transport improvements; train journeys are grossly overcrowded; Sheen road is deprived of direct buses to the station.	<ul style="list-style-type: none"> <li>The Council is not the provider of public transport services, however, it should be noted that policies in the Plan, including in particular Policy LP 44 Sustainable Travel Choices, ensure that major new developments maximise opportunities to provide safe and convenient access to public transport services, and the Council will work in partnership with providers such as Transport for London to achieve improvements.</li> </ul>
342	Paul Luton	Need to do more to encourage cycling, including provision of safe and pleasant walking and cycling routes to make journeys more convenient than using a car. Council should commit to adhering to London Cycle Design Standards. Improvements to transport links should only apply to active travel and public transport; selective permeability of back roads should keep through traffic out of residential areas. Travel Plans should include the requirement to monitor the actual travel modes with public reporting and the need to explain why they have failed - and how far the borough could help to make a difference. Walking and cycling to schools is key in the Government's Childhood Obesity strategy – Local Authorities should provide safe routes for them to do so.	<ul style="list-style-type: none"> <li>The Council considers that cycling and walking are sufficiently covered in the Local Plan. They are part of the strategic vision, strategic objectives as well as the spatial strategy. There are references to cycling and walking throughout the Plan, such as within the Green Infrastructure, Social and Community Infrastructure and Public Open Space, Play Space, Sport and Recreation policies, and importantly within the Health and Wellbeing policy. Emphasis on cycling and walking is covered in detail in Policy LP44 and cycle parking standards and related facilities are covered within Policy LP45.</li> <li>It should be noted that this is the Local Plan and not the borough's cycling strategy or Local Implementation Plan for Transport. For information, the Council is carrying out a public consultation on the borough's Cycling Strategy in the autumn of 2016: <a href="https://consultation.richmond.gov.uk/environment/cycling">https://consultation.richmond.gov.uk/environment/cycling</a></li> </ul>
343	Anthony Paish	Need to do more to increase cycling and walking	<ul style="list-style-type: none"> <li>The Council considers that cycling and walking are sufficiently covered in the Local Plan. They are part of the strategic vision, strategic objectives as well as the spatial strategy. There are references to cycling and walking throughout the Plan, such as within the Green Infrastructure, Social and Community Infrastructure and Public Open Space, Play Space, Sport and Recreation policies, and importantly within the Health and Wellbeing policy. Emphasis on cycling and walking is covered in detail in Policy LP44 and cycle parking standards and related facilities are covered within Policy LP45.</li> <li>It should be noted that this is the Local Plan and not the borough's cycling</li> </ul>

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			<p>strategy or Local Implementation Plan for Transport. For information, the Council is carrying out a public consultation on the borough's Cycling Strategy in the autumn of 2016:</p> <p><a href="https://consultation.richmond.gov.uk/environment/cycling">https://consultation.richmond.gov.uk/environment/cycling</a></p>
344	Lesley Forster	Include commitments to providing safe infrastructure for cycling	<ul style="list-style-type: none"> <li>• The Council considers that cycling is sufficiently covered in the Local Plan by virtue of being part of the strategic vision, strategic objectives as well as the spatial strategy. There are references to cycling throughout the Plan, such as within the Green Infrastructure, Social and Community Infrastructure and Public Open Space, Play Space, Sport and Recreation policies, and importantly within the Health and Wellbeing policy. Emphasis on cycling and walking is covered in detail in Policy LP44 and cycle parking standards and related facilities are covered within Policy LP45.</li> <li>• It should be noted that this is the Local Plan and not the borough's cycling strategy or Local Implementation Plan for Transport. For information, the Council is carrying out a public consultation on the borough's Cycling Strategy in the autumn of 2016:</li> </ul> <p><a href="https://consultation.richmond.gov.uk/environment/cycling">https://consultation.richmond.gov.uk/environment/cycling</a></p> <ul style="list-style-type: none"> <li>• Funding and investment are not matters for the Local Plan.</li> </ul>
345	John Finnerty	The many benefits of cycling, including - Reducing congestion - Improving health outcomes for residents - Cutting air and sound pollution - Making our borough a better place to live - Reducing the pressures of car parking, should be reflected in the plan, and cycling should be seen as mode of transport	<ul style="list-style-type: none"> <li>• The Council considers that cycling is sufficiently covered in the Local Plan by virtue of being part of the strategic vision, strategic objectives as well as the spatial strategy. There are references to cycling throughout the Plan, such as within the Green Infrastructure, Social and Community Infrastructure and Public Open Space, Play Space, Sport and Recreation policies, and importantly within the Health and Wellbeing policy. Emphasis on cycling and walking is covered in detail in Policy LP44 and cycle parking standards and related facilities are covered within Policy LP45.</li> <li>• It should be noted that this is the Local Plan and not the borough's cycling strategy or Local Implementation Plan for Transport. For information, the Council is carrying out a public consultation on the borough's Cycling Strategy in the autumn of 2016:</li> </ul> <p><a href="https://consultation.richmond.gov.uk/environment/cycling">https://consultation.richmond.gov.uk/environment/cycling</a></p> <ul style="list-style-type: none"> <li>• Funding and investment are not matters for the Local Plan.</li> </ul>
346	Dinesh Vitharanage	Not enough focus on building infrastructure for pedestrians and cyclists. Cycling and walking need to be embedded as a means of transport for all areas of the borough, and the local plan must recognise this with specific commitments to providing safe infrastructure for cycling, and a recognition that advisory and marketing programmes will not increase the rates of cycling or walking in the borough.	<ul style="list-style-type: none"> <li>• The Council considers that cycling is sufficiently covered in the Local Plan by virtue of being part of the strategic vision, strategic objectives as well as the spatial strategy. There are references to cycling throughout the Plan, such as within the Green Infrastructure, Social and Community Infrastructure and Public Open Space, Play Space, Sport and Recreation policies, and importantly within the Health and Wellbeing policy. Emphasis on cycling and walking is covered in detail in Policy LP44 and cycle parking standards and related facilities are covered within Policy LP45.</li> </ul>

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			<ul style="list-style-type: none"> <li>It should be noted that this is the Local Plan and not the borough's cycling strategy or Local Implementation Plan for Transport. For information, the Council is carrying out a public consultation on the borough's Cycling Strategy in the autumn of 2016: <a href="https://consultation.richmond.gov.uk/environment/cycling">https://consultation.richmond.gov.uk/environment/cycling</a></li> <li>Funding and investment are not matters for the Local Plan.</li> </ul>
347	Katharine Harrison, Surrey County Council	Where there are likely to be cross boundary impacts of development proposed in the Richmond Local Plan on Surrey's transport network, we consider that these impacts would need to be assessed and appropriate measures identified to resolve them. We would further anticipate that any required mitigation measures will be funded by the developer.	<ul style="list-style-type: none"> <li>Noted.</li> </ul>
348	Charles Pineles, Planning Spokesman, Richmond Society	Improve cross-borough cycling access and safety	<ul style="list-style-type: none"> <li>The Council considers that cycling is sufficiently covered in the Local Plan by virtue of being part of the strategic vision, strategic objectives as well as the spatial strategy. There are references to cycling throughout the Plan, such as within the Green Infrastructure, Social and Community Infrastructure and Public Open Space, Play Space, Sport and Recreation policies, and importantly within the Health and Wellbeing policy. Emphasis on cycling and walking is covered in detail in Policy LP44 and cycle parking standards and related facilities are covered within Policy LP45.</li> <li>It should be noted that this is the Local Plan and not the borough's cycling strategy or Local Implementation Plan for Transport. For information, the Council is carrying out a public consultation on the borough's Cycling Strategy in the autumn of 2016: <a href="https://consultation.richmond.gov.uk/environment/cycling">https://consultation.richmond.gov.uk/environment/cycling</a></li> <li>Funding and investment are not matters for the Local Plan.</li> </ul>
349	James Togher, Environment Agency	Support	Support noted.
350	Myrna Jelman	Need to redo the footpath along Sheen Road	<ul style="list-style-type: none"> <li>This is not a matter for the Local Plan and comments will be passed on to the relevant department within the Council.</li> </ul>
351	Helene Jelman	Need to redo the footpath along Sheen Road	<ul style="list-style-type: none"> <li>This is not a matter for the Local Plan and comments will be passed on to the relevant department within the Council.</li> </ul>
		<b><i>Policy LP45 Parking standards and servicing</i></b>	
352	Cllr Liz Jaeger	Need to consider preventing side extensions on shared driveways that could block a neighbour's access to off-street parking	<ul style="list-style-type: none"> <li>It should be noted that the majority of side extensions can be carried out under Permitted Development Rights, even if these encroach onto shared driveways. Matters relating to land ownership, covenants, title deeds, boundary issues etc. are non-planning matters and therefore should be dealt with under the Party Wall Act and through other Regulations. It is usually not something that the Council can get involved in and it is therefore also not a matter that the Council can address as part of the</li> </ul>

Ref No.	Name / Organisation	Summary of response received	Council's response
			Local Plan.
353	Tim Lennon, Borough Coordinator Richmond Cycling Campaign	Needs to mention cycle parking specifically and treat bikes as vehicles. Suggest a new policy about actively encouraging the use of pooling, sharing, scheduling and other methods to minimise the impact of deliveries on town centres. This will cut the number of heavy vehicles in the area, cut pollution, and make the area more inviting for visitors.	<ul style="list-style-type: none"> <li>• The policy already states: 'Requiring new development to provide for car, cycle, 2 wheel and, where applicable, lorry parking and electric vehicle charging points in accordance with the standards set out in Appendix 3.'</li> <li>• Use of pooling, sharing, scheduling and other methods referred to are not matters for the Local Plan.</li> <li>• Para 11.2.6 states that the majority of the borough's businesses and other organisations require regular servicing and deliveries to their site(s). It is recognised that whilst these vehicles provide a vital service, they can also be a cause of congestion, safety and environmental concerns if not properly managed through a variety of mechanisms. A balance needs to be struck between ensuring that businesses are able to receive the goods and services needed, whilst maintaining the attractiveness of the centres as well as protecting residential amenity.</li> <li>• A range of techniques and facilities can be used as tools in minimising any negative impacts from freight and servicing, and these will be considered in detail, on a case-by-case basis as part of a planning application, and where required, through planning conditions.</li> </ul>
354	Caroline Brock, Kew Society	Consider strengthening policy by requiring hard standing for parking to be kept to the minimum necessary in line with the ideas on front garden design contained in the Royal Horticultural Society's Greening Grey Britain	<ul style="list-style-type: none"> <li>• Part 2 of the policy LP 45 already sets out a presumption against front garden car parking and thus it already implies that hard standing for parking must be kept to a minimum. Also note that the Council is in the process of updating the SPD on Parking on Front Gardens, and this comment will be passed to relevant colleagues within the Council to ensure this issues raised is included within the updated SPD.</li> </ul>
355	Andrew Dorrian, Transport for London	Recognise that borough-wide parking research is underway, that will inform parking standards. TfL supports the assertion that parking should be directly related to the level of public transport accessibility. Car parking standards are reflective of the characteristics of Outer London. Parking policy can have a significant effect on influencing travel choice and addressing congestion issues. The level of congestion and air quality are important factors in determining an appropriate level of parking on a site specific or network basis. London Plan policy does not set minimum criteria for parking. London Plan allows more flexible approach in application of standards in Outer London in PTALS 0-1 and in limited locations in PTAL 2. If the Council wish to apply a more flexible approach in PTALS 2, account should also be taken to the implications for air quality and the impact of on-street parking measures such as CPZs. Other measures such as Car Clubs and CPZs should also be considered. TfL supports the restraint based approach to parking	<ul style="list-style-type: none"> <li>• The borough-wide parking standards research has been completed and published on the Council's website: <a href="http://www.richmond.gov.uk/ldf_parking_standards_research.pdf">http://www.richmond.gov.uk/ldf_parking_standards_research.pdf</a></li> <li>• Appendix 3 of the Local Plan has been updated in line with the findings and recommendations as set out in the borough-wide research.</li> <li>• Agree to remove 'proper' in para 1.</li> <li>• In relation to car-free developments, it is noted that the London Plan policy states that 'in locations with high public transport accessibility, car-free developments should be <i>promoted</i> (while still providing for disabled people). It is therefore understood that the Mayor of London does not <i>require</i> car free developments. A minor change is proposed to the wording of part 3. of this policy to refer to locations with high public transport accessibility.</li> <li>• A reference to 'low parking' is not considered appropriate because the parking standards are <i>maximum</i> and therefore lower levels would be</li> </ul>

Ref No.	Name / Organisation	Summary of response received	Council's response
		<p>in accessible locations.</p> <p>Currently the policy suggests that car free developments would be limited to PTAL areas 5 or 6. This runs the risk that some areas of PTAL 3 or 4 which have good levels of access would not normally be considered for no or low parking provision; this does not fully comply with London Plan policy 6.13.</p> <p>Suggested changes:</p> <ul style="list-style-type: none"> <li>- In para 1 remove reference to requirement for proper provision or add in, in line with borough standards,</li> <li>- Point 3 remove reference to PTAL 5 or 6 and replace with areas of good or excellent accessibility. It is recommended that low parking is referenced in this section as well.</li> <li>- Should a more flexible approach be proposed for PTAL 2, evidence should be provided including around air quality</li> <li>- Remove reference that car clubs do not remove the need for parking as per para 11.2.5.</li> </ul> <p>Cycle parking standards should be reflective of London Plan standards.</p> <p>Developers should be required to accord with this advice and be willing to make contributions towards cycling infrastructure which is necessitated by new demand for cycling in Richmond and across the borough.</p>	<p>acceptable in appropriate locations, such as areas with high public transport accessibility levels.</p> <ul style="list-style-type: none"> <li>• The borough-wide parking standards research has addressed and considered a number of criteria, including air quality, land take and other matters, such as use of car clubs and CPZs.</li> <li>• Minor change proposed in para 11.2.5 as suggested</li> <li>• Cycle parking standards are set out in Appendix 3, and these mirror London Plan standards.</li> </ul>
356	Ben Mackworth-Praed, on behalf of the Barnes Community Association	<p>Front garden parking should always be resisted/forbidden as it breaks up continuity of historic street scene.</p> <p>By removing one or more on-street parking places from the general pool, whether the off-street space is being used or not, it inevitably reduces the overall number of parking spaces available at any given moment. Charge householders with off-street parking an annual fee commensurate with Residents' Parking Charge in a CPZ.</p> <p>Increase fees for second cars in households</p>	<ul style="list-style-type: none"> <li>• The policy already contains a presumption against front garden parking.</li> <li>• Charging householders for off-street parking or increasing fees for second cars is not a matter for the Local Plan.</li> <li>• Also note that the Council is in the process of updating the SPD on Parking on Front Gardens.</li> </ul>
357	Brian Willman, Chair Ham and Petersham Neighbourhood Forum	<p>Appendix 3 currently only refers to vehicle parking and would benefit from the clarification of cycle parking and charging points.</p> <p>Emerging HPNP will specify cycling parking in line with London Plan standards.</p> <p>The emerging HPNP does not contain specific policies to resist the provision of front garden car parking.</p> <p>Consider requiring SuDS for parking surfaces.</p>	<ul style="list-style-type: none"> <li>• The borough-wide parking standards research has been completed and published on the Council's website: <a href="http://www.richmond.gov.uk/ldf_parking_standards_research.pdf">www.richmond.gov.uk/ldf_parking_standards_research.pdf</a></li> <li>• Appendix 3 of the Local Plan has been updated in line with the findings and recommendations as set out in the borough-wide research, and this includes cycle parking standards as well as standards for electric vehicle charging points.</li> <li>• It is not considered necessary to include a reference to sustainable drainage techniques as there is already a policy on Sustainable Drainage (see LP 21). Also note that the Council is in the process of updating the SPD on Parking on Front Gardens, and this comment will be passed to relevant colleagues within the Council to ensure this issues raised is included within the updated SPD.</li> </ul>

Ref No.	Name / Organisation	Summary of response received	Council's response
358	Sarah Stevens, Turleys for British Land	Paras 11.2.3 and 11.2.1 need to acknowledge the need to encourage people to travel by means other than the car.	<ul style="list-style-type: none"> <li>The Council considers that travel by means other than the car, such as cycling, walking and public transport, is sufficiently covered in the Local Plan by virtue of being part of the strategic vision, strategic objectives as well as the spatial strategy. There are references to for example walking and cycling within the Green Infrastructure, Social and Community Infrastructure and Public Open Space, Play Space, Sport and Recreation policies, and importantly within the Health and Wellbeing policy.</li> <li>It should be noted that this is the Local Plan and not the borough's Local Implementation Plan for Transport or the borough's transport strategy.</li> </ul>
359	Tim Catchpole, Planning Representative Mortlake with East Sheen Society	Include a map showing the different PTALs in the borough	<ul style="list-style-type: none"> <li>This is available on Transport for London's website: <a href="https://tfl.gov.uk/info-for/urban-planning-and-construction/planning-with-webcat/webcat">https://tfl.gov.uk/info-for/urban-planning-and-construction/planning-with-webcat/webcat</a> As the PTAL map may be updated from time to time to take account of public transport improvements and/or changes, it is not considered appropriate to include a map within the plan as this would likely to become out of date very quickly.</li> </ul>
360	Neil Henderson, Gerald Eve on behalf of Reselton Properties Ltd	<p>The level of parking provision is a major factor in the design of schemes and parking standards must be made available for public consultation.</p> <p>Following comments relate to existing standards: parking standards are stringent and no flexibility is provided to take account of site specific characteristics; current standards are overly prescriptive and are likely to lead to the provision of more parking than is likely to be required. Need to consider impacts on noise and air quality. Instead of applying rigid parking standards, we consider that policy should be flexible to allow decision-makers to consider the proposed transport strategies of schemes as a whole.</p> <p>London Plan Policy 6.1 sets out that the parking standards set out in Table 6.2 should be used by boroughs to set <b>maximum</b> car parking standards. At present, the LBRuT parking standards are more onerous than London Plan standards. Therefore, in order to be in accordance with the London Plan, LBRuT should work towards parking standards being set as maximum, with flexibility to take into account site specific circumstances and opportunities to reduce car ownership.</p> <p>Policy should incorporate scope to consider where reduced parking provision can be supported by appropriate management strategies to ensure that there is not an unacceptable impact on on-street parking, e.g. through car clubs, pool cars, car sharing, improved public transport and enhanced walking and cycling facilities and extending CPZ arrangements.</p>	<ul style="list-style-type: none"> <li>It is noted that the comments relate to the existing parking standards as the borough-wide parking standards research was not yet completed by the time the public consultation on the Pre-Publication Local Plan took place. The research has been completed and published on the Council's website: <a href="http://www.richmond.gov.uk/ldf_parking_standards_research.pdf">www.richmond.gov.uk/ldf_parking_standards_research.pdf</a></li> <li>Appendix 3 of the Local Plan has been updated in line with the findings and recommendations as set out in the borough-wide research, and this includes cycle parking standards as well as standards for electric vehicle charging points.</li> <li>It is the purpose of the Local Plan and its policies to clearly set out targets and requirements. Where evidence and justification is submitted as part of a planning application, the Council has the ability to consider applying some flexibility where this is fully justified.</li> </ul>
<b>Chapter 12 – Site Allocations</b>			
361	Rachel Botcherby, Planning	No comments	N/A

Ref No.	Name / Organisation	Summary of response received	Council's response
	Advisor, London and South East National Trust		
362	Janet Nuttall, Natural England	The following wildlife sites should also be given the same protection as European sites: potential SPAs, possible SACs, listed or proposed Ramsar sites and sites identified, or required, as compensatory measures for adverse effects on European sites should be included on the Proposals Map. Based on a review of the location of sites allocated for development we are not aware that these are likely to have a direct impact on designated sites. Also see comment 489 below in relation to the Sustainability Appraisal report.	<ul style="list-style-type: none"> <li>It is understood that boundaries for 'potential' designations are not available, and thus it is not possible to add them to the Proposals Map. As and when the boundaries become available, or once their designations are confirmed, we will be able to add them to our Proposals Map.</li> </ul>
363	Savills on behalf of Thames Water	Thames Water has provided site specific comments from desktop assessments on water supply and sewerage/wastewater infrastructure in relation to the proposed sites, but more detailed modelling may be required to refine the requirements. There has been limited opportunity to consider cumulative impacts. Therefore, the impact of multiple sites in the same area coming forward may have a greater impact. LP23 requirements should be mentioned in each site allocation in Section 12 of the Plan	<ul style="list-style-type: none"> <li>Include reference at the beginning of Section 12 to state that all policies within the Local Plan, including any other adopted planning policies and guidance apply to the sites within the site allocations section of the Plan. It is therefore not considered necessary to refer to individual policies and requirements within the site allocations.</li> </ul>
364	Dale Greetham, Sport England	12 Site Allocations: Unsound The following sites include (or potentially include) existing sports facilities: - SA8 - SA9 - SA10 - SA11 - SA15 - SA16 - SA17 - SA21 - SA22 - SA27 - MOL boundary change at Harrodian School, Barnes. Some of the above sites form part of, or constitute a playing field as defined in The Town and Country Planning (Development Management Procedure) (England) Order 2010 (Statutory Instrument 2010 No.2184), where Sport England would be consulted as a statutory consultee on any forthcoming planning applications	<ul style="list-style-type: none"> <li>Noted</li> </ul>
365	Katharine Fletcher, Historic England	Recommend that designated heritage assets on or adjoining the sites should be referred to in the policy. Despite Village Planning Guidance SPDs, Conservation area appraisals (CAAs) should continue to be referred to where applicable, as a useful source of information.	<ul style="list-style-type: none"> <li>Where relevant, references designated heritage assets will be added to the site allocation proposals.</li> </ul>
366	Celeste Giusti, Greater London Authority on behalf of Mayor of London	The Mayor notes that a number of Richmond's proposed Site Allocation sites have open space and MOL designations and he would like a stronger emphasis to be placed on protecting these elements from development.	<ul style="list-style-type: none"> <li>Where relevant, there will be stronger emphasis on protecting open spaces and MOL, although it should be acknowledged that the majority of the existing site allocations already refer to the need for development not to encroach into MOL. In addition, MOL policies will also apply.</li> </ul>
367	James Togher, Environment Agency	Support for protecting and enhancing river corridors and green infrastructure on SA9, SA10, SA11, and SA23. Pre-applications with Environment Agency are encouraged on these sites to	<ul style="list-style-type: none"> <li>Support noted.</li> <li>The Development Management teams, as part of the pre-application process, also encourage early engagement with the Environment Agency</li> </ul>

Ref No.	Name / Organisation	Summary of response received	Council's response
		deliver river corridor improvements as well as working in partnership with community groups such as FORCE, Thames 21, London Wildlife Trust etc.	where applicable.
		<b>SA 1 Hampton Square, Hampton</b>	
368	Savills on behalf of Thames Water	Thames Water is unable to make a detailed assessment of the impact of proposed housing provision on wastewater infrastructure. Indication of location, type and scale of development is needed.	<ul style="list-style-type: none"> <li>Noted. It is anticipated that a more detailed assessment is carried out by an applicant/developer as part of the planning application process. In addition, LP23 also applies.</li> </ul>
		<b>SA 2 Platts Eyot, Hampton</b>	
369	Kevin Scott, Kevin Scott Consultancy Ltd on behalf of Port Hampton Estates Limited	Support the wording of this policy. However, new vehicular access is required to the island to support growth in uses on the site. The policy should, therefore include reference to the need for vehicular access to the island as part of any development proposals.	<ul style="list-style-type: none"> <li>The policy recognises that there is currently restricted access to the island and that any proposed scheme will need to address the issue of providing safe access and egress in the event of flooding. Very limited vehicular access may be appropriate, provided that this does not change the character or appearance of the island.</li> </ul>
370	Savills on behalf of Thames Water	Thames Water has concerns regarding wastewater services on this site. There is unlikely to be capacity in this area to support the demand anticipated from this development. Upgrades to the existing infrastructure are likely to be required. It is important not to under estimate the time required to deliver necessary infrastructure. For example: local network upgrades can take around 18 months to 3 years to design and deliver.	<ul style="list-style-type: none"> <li>The concerns are noted. It would be the responsibility of the applicant/developer to carry out an assessment of the existing infrastructure capacity as part of the pre-planning and/or planning application process. In addition, LP23 also applies.</li> </ul>
371	Katharine Fletcher, Historic England	The reference to enabling development is inappropriate since there are specific conditions within which such development should be considered, and these always fall outside statutory local planning policies. We therefore recommend that this reference is omitted. Platts Eyot Conservation Area should be referenced, and the five listed buildings on the island.	<ul style="list-style-type: none"> <li>Agreed; remove reference to 'enabling'</li> <li>Add the five listed buildings and Platts Eyot Conservation Area in the supporting text</li> </ul>
		<b>SA 3 Hampton Traffic Unit, 60-68 Station Road, Hampton</b>	
372	Savills on behalf of Thames Water	Thames Water has concerns regarding wastewater services on this site. There is unlikely to be capacity in this area to support the demand anticipated from this development. Upgrades to the existing infrastructure are likely to be required. It is important not to under estimate the time required to deliver necessary infrastructure. For example: local network upgrades can take around 18 months to 3 years to design and deliver.	<ul style="list-style-type: none"> <li>The concerns are noted. It would be the responsibility of the applicant/developer to carry out an assessment of the existing infrastructure capacity as part of the pre-planning and/or planning application process. In addition, LP23 also applies.</li> </ul>
373	Katharine Fletcher, Historic England	Is the extent of the Building of Townscape Merit defined and is this information accessible? It would be useful for potential developers to understand the interest of the building. Hampton Village CA should be referenced.	<ul style="list-style-type: none"> <li>The entire Traffic Unit / whole building is a designated BTM</li> <li>Add reference to the Hampton Village Conservation Area in the supporting text</li> </ul>
		<b>SA 4 Hampton Delivery Office, Rosehill, Hampton</b>	
374	Savills on behalf of Thames Water	Thames Water has concerns regarding wastewater services on this site. There is unlikely to be capacity in this area to support the demand anticipated from this development. Upgrades to the existing infrastructure are likely to be required. It is important not to under estimate the time required to deliver necessary infrastructure. For example: local network upgrades can take around 18 months	<ul style="list-style-type: none"> <li>The concerns are noted. It would be the responsibility of the applicant/developer to carry out an assessment of the existing infrastructure capacity as part of the pre-planning and/or planning application process. In addition, LP23 also applies.</li> </ul>

Ref No.	Name / Organisation	Summary of response received	Council's response
		to 3 years to design and deliver.	
375	Katharine Fletcher, Historic England	This is a modern building and there is no objection to redevelopment. It would be helpful to include a reference to Hampton Village CA and CAA.	<ul style="list-style-type: none"> <li>• Add reference to the Hampton Village Conservation Area in the supporting text</li> </ul>
		<b>SA 5 Telephone Exchange, Teddington</b>	
376	Savills on behalf of Thames Water	On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.	Noted
377	Katharine Fletcher, Historic England	There is no objection to redevelopment of modern Telephone Exchange. The plan should refer to the position of the site within the High Street Teddington CA and any CAA. The development should also respect the setting of the listed buildings on the opposite side of the High Street - 79A-81A, 83-85, and 93-95 High Street, all listed grade II, and making up an important group within the medieval core of the village.	<ul style="list-style-type: none"> <li>• Add reference to the High Street Teddington Conservation Area and the need to respect the settings of the listed buildings on the opposite side of the High Street in the supporting text</li> </ul>
		<b>SA 6 Teddington Delivery Office, Teddington</b>	
378	Savills on behalf of Thames Water	On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.	Noted
379	Katharine Fletcher, Historic England	The policy should refer to the retention of the BTM. It is not clear which part of the buildings presently on the site are excluded from the local listing designation. Need a reference to the location within the Teddington High Street CA is important, and any CAA. Conversion and redevelopment opportunities should be modest and conserve and, where appropriate, enhance the conservation area.	<ul style="list-style-type: none"> <li>• Add reference to the need to retain the BTM.</li> <li>• Add reference to the High Street Teddington Conservation Area and that redevelopment opportunities should be modest, and conserve and, where appropriate, enhance the conservation area in the supporting text</li> </ul>
		<b>SA 7 Strathmore Centre, Strathmore Road, Teddington</b>	
380	Savills on behalf of Thames Water	On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.	Noted
381	Katharine Fletcher, Historic England	No designated heritage assets are likely to be affected. Teddington Cemetery in the vicinity is a Registered Park and Garden.	Noted
382	Krystyna Kujawinska	Site is location of Scamps, a non-profit making child-care organisation providing an essential service that numerous local residents rely on for out of school hours and preschool child-care. Scamps enables over 200 local families to go out to work, as well as employing over 30 staff. OFSTED registered nursery provision. High demand in the area, especially due to Stanley School expansion, and location of Scamps is ideal for providing services to increasing number of Stanley School and St James' Catholic School. Support in particular for working parents, and benefiting from nearby Fulwell	<ul style="list-style-type: none"> <li>• Noted. The current policy wording recognises the important contribution that the existing child-care services provide at this location.</li> </ul>

Ref No.	Name / Organisation	Summary of response received	Council's response
		<p>Station. Scamps also run holiday club.</p> <p>The Council has assured us that it is their objective to re-provide Scamps with suitable accommodation within any redevelopment of the site and that this will require sufficient notification from the outset.</p> <p>It is important that any re-provisioning related to the site is managed in conjunction with Scamps, in order to provide continuity of care for the children who attend.</p>	
383	Joanne Merritt (on behalf of the Governing Body of Stanley Primary School)	<p>We are pleased to note that the consultation states that "social and community infrastructure uses are the most appropriate land uses for this site". Scamps' service is vital to many Stanley Primary School families and any proposed redevelopment of the site must ensure this provision continues. Scamps is an integral part of our school community without which many families would struggle to manage their childcare needs.</p> <p>It is also imperative that outside space is maintained for the children's use. Scamps has a considerable impact on keeping down the traffic congestion at pick up and drop off times since it staggers the pressure. Area is also congested and suffers from inadequate parking, especially evident at the start &amp; end of school day. Any redevelopment of the Strathmore site must include sufficient additional parking.</p>	<ul style="list-style-type: none"> <li>• Noted. The current policy wording recognises the important contribution that the existing child-care services provide at this location.</li> <li>• Add reference to the need for on-site parking</li> <li>• In relation to the need for outdoor space, it should be noted that there is now a new park area next to the old TAVR site, in close proximity to the Strathmore site, which was developed by the Council and which opened in the summer of 2016. This park and playground provides a high quality standard playground within a very short walking distance to this site.</li> </ul>
<b>SA 8 St Mary's University, Twickenham</b>			
384	Charlotte Gibb, St Mary's University	Incorrect boundary map	<ul style="list-style-type: none"> <li>• Amend the site allocation boundary in line with the map provided by St Mary's University</li> </ul>
385	Katharine Fletcher, Historic England	<p>This is a highly sensitive site and consultation with Historic England is recommended at this stage to help inform the proposed site allocation. In addition to the Strawberry Hill House (grade I) and associated designations the site includes high quality Edwardian villas within the Waldegrave Park CA which should be retained. We look forward to discussions prior to the publication local plan.</p>	<ul style="list-style-type: none"> <li>• Engagement with Historic England is already taking place as part of the development of the site brief for this site.</li> <li>• Add reference to the high quality Edwardian villas within the Waldegrave Park Conservation Area.</li> </ul>
386	Mike Allsop, Committee member Strawberry Hill Residents' Association	<p>We endorse the comment in the plan regarding the need for any development proposal to respect the special and unique location and setting of the University within Strawberry Hill.</p> <p>The importance and relative openness of views across much of the site and its link as part of a green corridor make any developments on the site of particular interest and potential concern to residents.</p>	<ul style="list-style-type: none"> <li>• Add reference to the need to improve and enhance the MOL, including views and vistas</li> </ul>
<b>SA 9 Richmond upon Thames College, Twickenham</b>			
387	Andrew Dorrian, Transport for London	<p>TfL recognises that changes may be required to the A316 Chertsey Road (TLRN). Any changes to or additional signalised junctions onto the A316 must be fully justified having regard to operation of the wider network so as to ensure general conformity with London plan policy 6.11.</p>	<ul style="list-style-type: none"> <li>• Noted</li> </ul>

Ref No.	Name / Organisation	Summary of response received	Council's response
388	Katharine Fletcher, Historic England	There are no heritage designations. A reference to the forthcoming Twickenham Village Plan could be included.	<ul style="list-style-type: none"> <li>• Add reference to the Twickenham Village Planning Guidance SPD</li> </ul>
		<b>SA 10 The Stoop (Harlequins Rugby Football Club), Twickenham</b>	
389	Rob Gray, Friends of the River Crane Environment (FORCE)	SA 10 should refer to Duke of Northumberland River	<ul style="list-style-type: none"> <li>• Add reference to the Duke of Northumberland River</li> </ul>
390	Katharine Fletcher, Historic England	We recommend references to the setting of Rosecroft CA and the forthcoming Twickenham Village Plan.	<ul style="list-style-type: none"> <li>• Add reference to the setting of the Rosecroft Conservation Area and the Twickenham Village Planning Guidance SPD</li> </ul>
		<b>SA 11 Twickenham Stadium, Twickenham</b>	
391	Andrew Dorrian, Transport for London	TfL will continue to work closely with the applicant and council on the development of the stadium and any ancillary uses. The A316 study referred to in our February response is applicable for any future development at the site, together with, servicing facilities and a visitor management plan.	<ul style="list-style-type: none"> <li>• Noted</li> </ul>
392	Katharine Fletcher, Historic England	A reference to the forthcoming Twickenham Village Plan could be included.	<ul style="list-style-type: none"> <li>• Add reference to the Twickenham Village Planning Guidance SPD</li> </ul>
393	Rob Gray, Friends of the River Crane Environment (FORCE)	SA 11 should make it clear that any proposals should facilitate improved access along DNR and include environmental improvements	<ul style="list-style-type: none"> <li>• Add reference to the Duke of Northumberland River</li> </ul>
394	Savills on behalf of Thames Water	Thames Water has concerns regarding wastewater services on this site. There is unlikely to be capacity in this area to support the demand anticipated from this development. Upgrades to the existing infrastructure are likely to be required. It is important not to under estimate the time required to deliver necessary infrastructure. For example: local network upgrades can take around 18 months to 3 years to design and deliver.	<ul style="list-style-type: none"> <li>• The concerns are noted. It would be the responsibility of the applicant/developer to carry out an assessment of the existing infrastructure capacity as part of the pre-planning and/or planning application process. In addition, LP23 also applies.</li> </ul>
395	Marie Claire Marsh, NLP Planning on behalf of RFU	RFU welcomes inclusion of draft site allocation policy, but requests amendment as follows: "The Council supports the continued use <i>and growth</i> of the grounds for sports uses <i>so that it can continue to provide a world class standard of facilities and visitor experience, appropriate to its status as a national stadium and the internal home of rugby</i> . Appropriate additional facilities including a new east and north stands, indoor leisure, hotel or business uses, as well as hospitality and conference facilities, <i>may will</i> be supported provided that they are complementary to the main use of the site as a sports ground <i>and events</i>	<ul style="list-style-type: none"> <li>• Add reference to the fact that the stadium provides a world class standard of facilities and visitor experience.</li> <li>• The main use of the site is the sports use and therefore a reference to 'events stadium' is considered to detract from the main sports use.</li> <li>• Reference to employment floorspace and potentially residential uses is already contained within the supporting text.</li> <li>• Reference to residential amenity will be included.</li> <li>• References to the highway network and the Duke of Northumberland River are already contained within the supporting text.</li> </ul>

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		<p><u><i>stadium. Residential and/or office developments would also be acceptable. Proposals for new development and uses will be considered positively, provided that the proposed development or new uses would not have a detrimental environmental impact on the surrounding area, in particular residential amenity, and that there would not be an unacceptable impact on the local highway network. Proposals should protect the Duke of Northumberland River."</i></u></p> <p>There is a need to review the borough's MOL boundaries, including provision of clear evidence to support delete of the MOL designation from the Stadium. Council's previous response confirmed that MOL land does not provide 'open air facilities for leisure', and therefore does not meet criterion b of the London Plan Policy 7.17. However, the Council's response stated that the site forms part of a wider green infrastructure network and that the MOL land is distinguishable from the built-up area (criterion a) and that 'by virtue of being situated adjacent to the river, it is considered to be of importance to the local as well as wider green infrastructure network' (criterion d). The Council did not comment either way in respect of criterion c which states MOL land included features or landscapes of either national or metropolitan value.</p> <p>Landscape Character and Visual Appraisal report was undertaken; this confirms that:</p> <ul style="list-style-type: none"> <li>• the MOL designation of a band spanning between 30 and 50m of the RFU's land is arbitrary and the eastern boundary within the stadium grounds does not relate to any physical features or land uses. Land does not meet London Plan criteria.</li> <li>• Large areas of parking, storage compounds and disparate collection of associated permanent and temporary service buildings are ancillary to the main sports activity at the stadium and, in isolation, provide no specific leisure, recreational or open space function.</li> <li>• Council is inconsistent in removal of MOL designations, i.e. precedent has been established on the neighbouring sports ground. LBRuT did not consider it necessary to retain MOL over areas used for parking and servicing facilities at the Harlequins ground, or to retain parts of the designation to provide a future landscape buffer along the watercourse. Where public open space was retained at the Stoop its long-term protection in policy terms was achieved by using the Borough's local OOLTI designation.</li> <li>• MOL designation is not continued across the neighbouring borough. Any direct link between the river and the stadium grounds is prevented by the boundary security fencing.</li> <li>• The character of the river corridor (DNR) is distinctly different and clearly distinguishable from that of the urban stadium site in terms of scale, form and</li> </ul>	<ul style="list-style-type: none"> <li>• In relation to a borough-wide MOL boundary review, it is acknowledged that national guidance on Green Belt states that Green Belt boundaries [and MOL] should only be altered in exceptional circumstances.</li> <li>• The Local Plan's Spatial Strategy states that the borough's parks and open spaces provide the green lung for south/west London. In addition, there is a presumption against the loss of, or building on, greenfield sites as well as MOL/Green Belt in this borough, unless very special circumstances and/or an exception to relevant policies can be demonstrated. In addition, the Plan demonstrates that the Borough can meet its housing needs without releasing open land that is protected by designations such as Green Belt or MOL. Therefore, a borough-wide Green Belt or MOL review is not undertaken as part of this Local Plan.</li> <li>• In relation to the MOL on this site, it should be noted that this site is adjacent to the Duke of Northumberland River, which is designated MOL. The borough's rivers are green corridors and it is important to retain a buffer to the river corridor. Although the MOL on the Stadium site has become somewhat degraded over the years, it is still a valuable part of the river corridor.</li> <li>• In line with the London Plan policy on MOL (7.17), at least one of the following criteria has to be met in order to designate land as MOL: <ul style="list-style-type: none"> <li>a) it contributes to the physical structure of London by being clearly distinguishable from the built up area</li> <li>b) it includes open air facilities, especially for leisure, recreation, sport, the arts and cultural activities, which serve either the whole or significant parts of London</li> <li>c) it contains features or landscapes (historic, recreational, biodiversity) of either national or metropolitan value</li> <li>d) it forms part of a Green Chain or a link in the network of green infrastructure and meets one of the above criteria.</li> </ul> </li> <li>• It is the Council's view that the wider MOL (of which this site's MOL is part of) contributes to the physical structure of London by being clearly distinguishable from the built up area. Over the last years, the strip of land designated as MOL on this site has become more deteriorated as various temporary structures/service buildings, compounds and proposals for fencing etc. have been proposed and/or erected. In addition, the hard standing areas have increased and encroached into the MOL over the years. Therefore, overall, it is acknowledged that the value of the MOL has deteriorated. However, this is not a reason for de-designated this strip of land from the wider MOL, and as such, the Council considers that – in conjunction with the DNR and the adjacent MOL (including Chase Bridge</li> </ul>

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		<p>appearance and closely associated surrounding mixed built form of Twickenham. Retention of the designation on the RFU land as a 'landscape buffer' is no longer appropriate or necessary</p> <ul style="list-style-type: none"> <li>• It has no ecological benefit as approximately 95% of the MOL designated land at the stadium is hard standing or buildings, comprising astroturf, brick paving, concrete surface and loose stone paving.</li> </ul>	<p>School) – this MOL continues to meet criterion a) of the London Plan policy.</p> <ul style="list-style-type: none"> <li>• In addition, it is the Council's view that the MOL designation on this site, i.e. the strip of land between 30-50 metres needs to be considered in conjunction with the DNR, as well as the adjacent Chase Bridge School, which is also within MOL. The importance of this corridor, which links with the wider (Lower) Crane corridor is also recognised in the All London Green Grid SPG and the River Colne and Crane Area Framework. The latter specifically mentions the importance of the Duke of Northumberland's River as it travels past the rugby stadium and through Mogden Sewage Works to Isleworth. It is therefore indisputable that the borough's river corridors, including land and buffer areas adjacent to it, are of value to the wider green infrastructure network. It is evident that this site forms part of a larger swathe of MOL, providing a connection and buffer to the DNR, which connects further to the River Crane to the south as well as the open land and playing fields at Chase Bridge to the west, which link further with the grounds of Kneller Hall.</li> <li>• It should also be noted that the current chain link fence is only a minor/indirect barrier to the wildlife and as such, birds, bats and small mammals can easily pass over/under, and in some sections the ivy has created a hedge, which is another important habitat. There are protected species (all species of bats and water voles) and lots of habitat restoration works recently carried out along the DNR will in time create a much better quality of habitat in this location. Note that the DNR is also designated Other Site for Nature Importance.</li> <li>• The SPG's Area Framework also states that projects here should address issues of river path upgrades, habitat creation and the relationship of the rivers to adjacent open spaces. It is therefore considered that the MOL on this site forms part of a link in the network of green infrastructure and meets criterion d).</li> <li>• In summary, the MOL meets at least 2 out of 4 criteria for designating MOL as defined within the London Plan. By virtue of the MOL's location adjacent to and alongside the DNR, it clearly contributes to the physical structure of London by being distinguishable from the built up area when taken as a whole, and which provides a distinct break from the main Stadium to the east. In addition, the site provides an important link and buffer area to the DNR. By virtue of being situated adjacent to the river, it is considered to be of importance to the local as well as wider green infrastructure network and biodiversity (i.e. criteria a) and d) of the MOL policy).</li> <li>• The Council would urge the RFU in addressing the state of the MOL,</li> </ul>

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			<p>including the relationship of the MOL and the stadium with the DNR and its wider corridor, which the RFU has neglected in recent years. It is important to note that the overall state and appearance of the MOL and the poor environmental quality is not accepted as an argument for removing it from the MOL designation. Instead, the Council's view is that, considering the overall size of the whole site and the importance of this international sporting venue and visitor destination, it should be possible to avoid permanent buildings/structures within the MOL, and the Council would urge the RFU to consider making environmental and visual improvements to this area, including improving the relationship as well as access to the DNR; for example by river path upgrades and, habitat creation involving realignment of suitable existing perimeter fencing, landscaping, removal or replacement of inappropriate fencing and screening, and reduction of the visual impact of traffic or car parking as well as opening up views into and out of MOL.</p> <ul style="list-style-type: none"> <li>• Should any proposals for the site come forward, this will be assessed in line with MOL policies.</li> </ul>
		<b>SA 12 Mereway Day Centre, Mereway Road, Twickenham</b>	
396	Savills on behalf of Thames Water	On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.	Noted
397	Katharine Fletcher, Historic England	There are no designated heritage assets. A reference to the forthcoming Twickenham Village Plan could be included.	Noted
398	Rob Gray, Friends of the River Crane Environment (FORCE)	Drawing omits crane and new bridge, and height limitation essential	<ul style="list-style-type: none"> <li>• The site location maps are produced on the basemaps provided by Ordnance Survey, which the Council cannot amend.</li> </ul>
		<b>SA 13 Telephone Exchange, Whitton</b>	
399	Katharine Fletcher, Historic England	No designated heritage assets	Noted
		<b>SA 14 Ham Close, Ham</b>	
400	Savills on behalf of Thames Water	Thames Water has concerns regarding wastewater services on this site. There is unlikely to be capacity in this area to support the demand anticipated from this development. Upgrades to the existing infrastructure are likely to be required. It is important not to under estimate the time required to deliver necessary infrastructure. For example: local network upgrades can take around 18 months to 3 years to design and deliver.	<ul style="list-style-type: none"> <li>• The concerns are noted. It would be the responsibility of the applicant/developer to carry out an assessment of the existing infrastructure capacity as part of the pre-planning and/or planning application process. In addition, LP23 also applies.</li> </ul>

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401	Geoff Bond, Chair Ham and Petersham Association	Ham Village Green should be designated as Public Open Space and as an Other Site of Townscape Importance. The Public Open Space designation indicates that it is part of the hierarchy of greenspace infrastructure available to all residents and not part of the Ham Close estate. Any redevelopment should to respond to the distinctive character of Ham rather than just the existing Ham Close which is not typical of Ham.	<ul style="list-style-type: none"> <li>• The Green is already designated Public Open Space and OOLTI – add reference in this regard.</li> <li>• It is acknowledged that any redevelopment should respond to the distinctive character of the existing Ham Close as well as Ham – add reference in this regard.</li> </ul>
402	Brian Willman, Chair Ham and Petersham Neighbourhood Forum	Support inclusion of Ham Close, but there is a need to mention the designation of Ham Village Green as Public Open Space and as an Other Site of Townscape Importance. The Public Open Space designation indicates that it is part of the hierarchy of greenspace infrastructure available to all residents and not part of the Ham Close estate. Any redevelopment proposal must respond to the distinctive character of Ham and not just the existing Ham Close which is completely untypical of the wider area. Character Area appraisals are included in the emerging Ham and Petersham Neighbourhood Plan and will provide the context for a required Character and Context Appraisal. The reference to servicing and car parking should include storage for bicycles. Cross refer to policies for character, amenity and townscape quality standards. Development will be expected to attain rather than the current vague statement about not compromising unspecified amenity and townscape qualities. New policy on building heights (LP 2) is particularly relevant.	<ul style="list-style-type: none"> <li>• The Green is already designated Public Open Space and OOLTI – add reference in this regard.</li> <li>• It is acknowledged that any redevelopment should respond to the distinctive character of the existing Ham Close as well as Ham – add reference in this regard.</li> <li>• The emerging Ham and Petersham Neighbourhood Plan is already referred to in the supporting text.</li> <li>• Add reference to cycle parking</li> <li>• It is not considered necessary to refer to other policies within the Plan as all policies apply.</li> <li>• Add reference that any development should enhance the quality of the local townscape, thereby creating a more cohesive sense of place.</li> </ul>
403	Katharine Fletcher, Historic England	This site presents real opportunities for enhancement through redevelopment so that it enhances the quality of the local townscape and creates a more cohesive sense of place. Greater information is needed in the supporting text regarding how the development can respond to 'local character and history' (NPPF, para 58). The site adjoins Ham House Conservation Area which draws much of its identity from Ham Street and the many listed buildings and Victorian properties that line the frontage; special regard should be had to Beaufort House, Newman House, Manor House and their associated listed buildings and to how the new development responds positively to the conservation area and its qualities.	<ul style="list-style-type: none"> <li>• Add reference that any development should enhance the quality of the local townscape, thereby creating a more cohesive sense of place.</li> <li>• Add reference to the setting of the adjacent Ham House Conservation Area and the many listed buildings and Victorian properties that line the frontage.</li> <li>• Add reference to responding positively to the Conservation Area.</li> </ul>
		<b>SA 15 Cassel Hospital, Ham Common, Ham</b>	
404	Brian Willman, Chair Ham and Petersham Neighbourhood Forum	The plan does not make clear how much of the site is designated OSNI/OOLTI - not just the "grounds to the rear" but also to the side. It would be helpful if the Listed Buildings reference was to the "original buildings" so that the reference does not cover the whole site. Emerging HPNP identifies the permeability of the area arising from the network of paths as characteristic of the neighbourhood and a footpath /cycle path link from Dukes Avenue to Ham Common, which could make a valuable addition to this network and a link between the Thames Path and Ham Common.	<ul style="list-style-type: none"> <li>• Add reference to grounds to the rear and side</li> <li>• Any applicant/developer for this site would be able to access the extent of the Listed Buildings</li> <li>• It is considered more appropriate for the Ham and Petersham Neighbourhood Plan to refer to more details in relation to this site, such as the footpath / cycle path link.</li> </ul>

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405	Katharine Fletcher, Historic England	<p>Strongly advise that reference to enabling development is omitted since this is inappropriate to the circumstances in this case, and should not be a matter included in local plan policy.</p> <p>Amend as follows:  <i>'Should the <u>Grade II listed Cassel Hospital</u> become surplus to requirement, it is to be converted to residential and community uses with an appropriate level of affordable units. The restoration and conversion would need to protect and enhance the listed buildings and the Ham Common Conservation Area and their settings. <u>The settings of neighbouring listed buildings including the Grade II* listed 1-18, 19-24 and 25-30 Langham House Close, and Grade II listed Langham House, will also need to be considered as part of any development on this site.</u></i>  <i>The grounds ...</i></p>	<ul style="list-style-type: none"> <li>Remove reference to 'enabling development'</li> <li>Add reference to Grade II listed Cassel Hospital and importance of settings of neighbouring listed buildings</li> </ul>
406	Savills on behalf of Thames Water	<p>Thames Water has concerns regarding wastewater services on this site. There is unlikely to be capacity in this area to support the demand anticipated from this development. Upgrades to the existing infrastructure are likely to be required. It is important not to under estimate the time required to deliver necessary infrastructure. For example: local network upgrades can take around 18 months to 3 years to design and deliver.</p>	<ul style="list-style-type: none"> <li>The concerns are noted. It would be the responsibility of the applicant/developer to carry out an assessment of the existing infrastructure capacity as part of the pre-planning and/or planning application process. In addition, LP23 also applies.</li> </ul>
407	Tor Barrett, NLP Planning on behalf of the West London Mental Health NHS Trust	<p>Cassel Hospital is the Trust's only site in LBRuT. The Cassel Specialist Personality Disorder Service (CSPD) (previously known as the Emerging Severe Personality Disorder Service (ESPD)) is a national service. The CPSP occupies less than half the premises at Cassel Hospital. The remainder of the buildings are vacant and have been since 2011. The Trust has no ongoing requirement for this vacant space and can no longer sustain the financial cost of maintaining this largely empty, listed property and extensive grounds in the long term. The Trust is considering options for the location of the CSPD service and as such the future of the site. The main Grade II listed building has previously been marketed for lease for over 12 months in accordance with its current planning designation but did not generate any serious enquiries.</p> <p>We welcome the removal of education use from the site allocation since the Local Plan Review consultation. However, the Trust is seriously concerned about the wording: <i>"social and community infrastructure uses are the most appropriate land uses for this site. Conversion or potential redevelopment for residential uses could be considered if it enables the protection and restoration of the Listed Buildings."</i></p> <p>The Trust supports the possibility of delivering some form of small-scale social/community infrastructure on the site in principle, it cannot support the promotion of this use as <i>"the most appropriate land use"</i>. Need to take into account NPPF policy and guidance on viability and deliverability. In order to secure a long term future for the site, the project must be economically viable</p>	<ul style="list-style-type: none"> <li>The policy acknowledges that the site is an existing social infrastructure use, and that conversion or potential redevelopment for residential uses could be considered provided that this supports the protection and restoration of the Listed Buildings. It is therefore considered that this provides sufficient flexibility. It will be for the applicant/developer to demonstrate that there are no other viable social infrastructure / community uses.</li> <li>Reference to viability is already included in the context of allowing for residential development to support the protection and restoration of the Listed Buildings. Section 13 of the Local Plan also deals with viability.</li> <li>Reference to enabling development is to be removed.</li> </ul>

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		<p>and deliverable. The wording of the site allocation needs to be positively prepared to facilitate a viable scheme.</p> <p>The Trust is a provider of community services and it cannot sustain the financial burden of operating and maintaining this listed building in the long term. It is clear to us that there is no prospect of a community use taking over the liability of this listed building and sustaining a community use.</p> <p>The building was originally a residential dwelling-house; residential is an appropriate alternative use. Residential should not be referred to as 'could' be considered 'if' it enables protection of Listed Buildings and as secondary to social/community use.</p> <p>Historic England guidance applies to 'enabling development' that by definition is contrary to established planning policy. Remove this reference.</p> <p>Suggest wording: "<i>If the site is declared surplus to requirements, <b>residential and/or some</b> social and community infrastructure uses are the most appropriate land uses for this site.</i>"</p> <p>Amendments for justification as follows:</p> <p><i>"If the site is declared surplus to requirements, in whole or part, appropriate land uses include <b>residential use, and/or some</b> social and community infrastructure uses." "<del>Only if other alternative social or community infrastructure uses have been explored and options discounted in line with other policies in this Plan, would</del> <b>A residential-led scheme will be expected to provide</b> affordable housing and on-site car parking <del>be considered as a potential redevelopment option</del> <b>subject to robust viability evidence</b>"</i> In addition, it is considered that the following statement should be removed from the supporting text: "<i>It is acknowledged that conversion or potential redevelopment for enabling residential uses may be needed to support the protection and restoration of the Listed Buildings; residential uses should however be limited to the minimum necessary to achieve viability, in line with Historic England guidance on 'Enabling Development and the Conservation of Significant Places'.</i>"</p>	
408	Katharine Fletcher, Historic England	<p><b>SA 16 St Michael's Convent, Ham Common, including new OOLTI designation</b></p> <p>Strongly advise that reference to enabling development is omitted since this is inappropriate to the circumstances in this case, and should not be a matter included in local plan policy.</p> <p>Amend as follows:</p> <p><i>'Should the Grade II listed St Michael's Convent, <u>including The Cottage (also Grade II listed)</u>, become surplus to requirement, it is to be converted to residential and community uses with an appropriate level of affordable units. The restoration and conversion would need to protect and enhance the two listed buildings and the Ham Common Conservation Area, including their settings. <u>The settings of neighbouring heritage assets including Grade II* registered Ham</u></i></p>	<ul style="list-style-type: none"> <li>• Remove reference to 'enabling development'</li> <li>• Add reference to Grade II listed St Michael's Convent and The Cottage as well as the importance of settings of neighbouring listed buildings</li> </ul>

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		<i>House Historic Park and Garden of special historic interest, Grade II listed Avenue Lodge, Avenue Lodge Cottage, Avenue Cottage and Hardwicke House will also need to be considered as part of any development on this site. The grounds...'</i>	
409	Fabio Galvano	Support for OOLTI and implement as soon as possible. Gardens are essential to the character of the area: not only in terms of views and tranquillity, but also of security due to the long (and protected) wall separating them from Martingales Close. Due to the biodiversity of the gardens, they should also be protected as Other Site of Nature Importance (OSNI). By virtue of their size, position and quality, the gardens represent great value to local people.	Noted
410	Caroline Britton	Strong support for the proposed protection of the gardens by giving them an OOLTI designation. Garden is an oasis of peace, tranquillity and greenness. The gardens provide an essential link in the green corridor that links the riverside land, through to Ham Common and Richmond Park	Noted
411	Peter Britton	Strong support for OOLTI designation. Well-loved local area of tranquillity and biodiversity for generations.	Noted
412	Jane Morrison	Support for OOLTI designation, also for biodiversity reasons.	Noted
413	Paul Massey	Support for OOLTI designation. Its size, character and location on the famous Ham Common provide a magnificent backdrop to the area. Gardens in particular provide the local people with an open area of peace and tranquillity (enormously valued in this busy and over populated world). I am concerned about the developments on the St. Michaels Convent, Ham project and the way that Indigo/Beechcroft are disregarding the Strategic Objectives when presenting their plans.	Noted
414	Ray Morrison	Support for OOLTI designation. Development at St Michael's should hold to the existing foot print.	Noted
415	Savills on behalf of Thames Water	Thames Water is unable to make a detailed assessment of the impact of proposed housing provision on wastewater infrastructure. Indication of location, type and scale of development is needed.	<ul style="list-style-type: none"> <li>Noted. It is anticipated that a more detailed assessment is carried out by an applicant/developer as part of the planning application process. In addition, LP23 also applies.</li> </ul>
416	Kathleen Massey	Support for OOLTI designation. I note that one of the criteria of OOLTI designation is that any development 'does not harm the character and openness of the open land'. This is an essential consideration in relation to the Convent Gardens. In terms of the openness of the open land, the convent lies in the Great South Avenue of Ham House, at the heart of the wildlife corridor which locals enjoy and have worked hard to retain and maintain. The convent garden is a beautiful mix of mature trees, plants and vegetation. It is a traditional, peaceful English garden, the like of which is rare in an urban landscape. It is a delight much	Noted

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		enjoyed by all who live locally and those who visit.	
417	David and Patricia Yates	Support for OOLTI designation for following reason: 1. It is an established principle of nature conservation that major conservation areas are much strengthened if there are corridors of wildlife-friendly habitat linking them. The map shows that at present there is such a corridor linking Richmond Park to the River Thames via Ham Common, St Michael's Convent and Avenue Lodge gardens, Grey Court School playing fields, Ham House avenues and gardens, and the Ham Lands. This means that the Convent garden fits well in this respect with the requirements for OOLTI status as given in the Draft Plan. 2. Martingales Close has a special attractive character because its houses are on one side of the road only, the other side adjoining the Convent garden. This unusual feature would of course be lost if the garden was developed.	Noted
418	Geoff Bond, Chair Ham and Petersham Association	Support for OOLTI designation as it provides considerable local amenity in terms of a tranquil setting for wildlife, open views and its value in the green corridor from the Thames to Ham Common.	Noted
419	Dale and Juliet Nolan	Support for OOLTI designation as gardens are essential to character of Ham, providing tranquillity and important link between river and Richmond Park for wildlife.	Noted
420	Andrew & Bryony Barnard	Support for OOLTI designation. We welcome redevelopment of the site for over 55 occupation by converting the older buildings into apartments and with the replacement of more recent additions with sympathetically designed housing, but there should be no encroachment into the gardens.	Noted
421	Gilda Rogner	Support for OOLTI designation. Gardens is an essential part due to the character of the area and the contribution it makes, as well as the green corridor it provides from the land around the river to Ham Common and Richmond Park. Presents rare haven for a wide range of wildlife.	Noted
422	Geoff Bond, Chair Martingales Close Residents' Association	Support for OOLTI designation. It is a large garden occupying a critical space on the green corridor from the Thames to Ham Common. It provides for a range of habitats for birds and animals. It is a rare pocket of green for local people to gain amenity from.	Noted
423	Jane Bond	Support for OOLTI designation. Gardens are precious local wildlife corridor; observed families of badgers travelling into gardens.	Noted
424	Martin Kirrage	Support for OOLTI designation due to their great environmental importance, providing home to a large variety of bird and animal wild life. It is very important to maintain this level of biodiversity, plus maintaining the semi-rural nature of	Noted

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		the area which is very rare in a London Borough.	
425	George Burgess, Indigo Planning on behalf of Beechcroft Developments Ltd	Beechcroft Developments are seeking to develop St Michael's Convent, Ham Common for residential use. The Buildings no longer suit the Sister of the Church, who are going to relocate to Buckinghamshire in 2017. A planning application for the development of the site will be submitted imminently. Site allocation implies it is an existing community use, however, it is not open to the public is essentially in quasi residential use. Site also occasionally accommodates a very modest number of visitors (from other parts of UK, internationally incl. Africa) who attend as part of their studies to join the clergy; it does not support an extensive or substantive local community use. There is no public access (except for a couple of times per year as part of National Garden Scheme). The Council has not undertaken any assessment or provided any evidence that supports the demand for social infrastructure/community use. Conversely, there is strong evidence base which demonstrates a strong need for residential accommodation. Residential is the only serious land use that can support the long term viability of looking after the listed buildings and adjoining land.	<ul style="list-style-type: none"> <li>• The Council treats this site as a social infrastructure use. The policy acknowledges that conversion or potential redevelopment for residential uses could be considered provided that this supports the protection and restoration of the Listed Buildings. It is therefore considered that this provides sufficient flexibility. It will be for the applicant/developer to demonstrate that there are no other viable social infrastructure / community uses.</li> <li>• Reference to viability is included in the context of allowing for residential development to support the protection and restoration of the Listed Buildings. Section 13 of the Local Plan also deals with viability.</li> </ul>
426	Anna Smith	Support for restoration of listed buildings and redevelopment within the existing footprint of the current buildings. OOLTI designation is strongly supported. Gardens are a haven for wildlife and should be protected.	Noted
427	Brian Willman, Chair Ham and Petersham Neighbourhood Forum	Convent has now been sold and first 2 bullet points need to be updated. Strong support for OOLTI designation. Listed Buildings reference should only refer to 'original buildings'	<ul style="list-style-type: none"> <li>• Acknowledge that the property has now been sold</li> <li>• Any applicant/developer for this site would be able to access the extent of the Listed Buildings</li> </ul>
		<b>SA 17 Ryde House, East Twickenham</b>	
428	Katharine Fletcher, Historic England	The proposal should respect the prevailing height of buildings along the Richmond Road and conserve or enhance the Richmond Road (E Twickenham) CA. Policy should refer to CA in policy and any CAA. Special regard should also be had to the setting of Ryde House (listed grade II) adjoining the site. An early assessment of capacity should be made to ensure the site can accommodate the school and supermarket needs within the parameters of securing a beneficial relationship with these heritage assets.	<ul style="list-style-type: none"> <li>• Add reference to Richmond Road (East Twickenham) Conservation Area and the Ryde House Grade II listed building adjoining to the site</li> </ul>
		<b>SA 18 Richmond Station, Richmond</b>	
429	Andrew Dorrian, Transport for London	TfL welcomes the desire to improve the station and requests consultation on the detailed proposals due to the incidence of both London Overground and London Underground services operating from this station.	Noted
430	Charles Pineles,	We heartily approve the redevelopment of the station area which represents an	Noted

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	Planning Spokesman, Richmond Society	opportunity not to be missed for the longer term future of the town.	
431	Helene Jelman	I ask that access to the tracks and new ticket gates be prioritised and provided on the Church Road end of the tracks.	<ul style="list-style-type: none"> <li>• This level of detail will need to be assessed as part of any planning application for this site</li> </ul>
432	Myrna Jelman	I ask that access to the tracks and new ticket gates be prioritised and provided on the Church Road end of the tracks.	<ul style="list-style-type: none"> <li>• This level of detail will need to be assessed as part of any planning application for this site</li> </ul>
433	Mike Mills, Firstplan Ltd on behalf of Maxicorp Ltd	<p>Our client has acquired Westminster House and is assessing various options for the building and for the wider site as a whole. Maxicorp Ltd supports the site allocation for the mixed use redevelopment of the wider Richmond Station site. In land use terms, the policy is considered to be flexible in allowing and encouraging a mix of town centre uses including retail, office, leisure and residential. Whilst the wording of the policy notes that the provision of retail floorspace is a priority, there are no stipulations within the policy regarding the quantum of floorspace for each use and split/mix in terms of any affordable housing and such flexibility is welcomed in these challenging economic times.</p> <p>However, it should be noted that the regeneration of the site cannot be facilitated without a viable redevelopment scheme and our client is concerned that the site allocation is not sufficiently flexible with regard to development costs.</p> <p>Site brief from 2002 demonstrates that this is a complex and expensive site as it has not yet come forward for development. The complexities of development and viability considerations should be reflected in the site allocation.</p> <p>Flexibility is needed in relation to building heights; site allocation should allow for taller buildings than 6 storeys/18 metres where there are exceptional circumstances and can be robustly justified in design and heritage terms. A well designed taller building that responds well to local context could also improve the appearance of this important 'gateway' site by providing a new landmark building and a new sense of place.</p> <p>Add following to justification: <b>Tall buildings above 6 storeys/18 metres may be acceptable on this site where there is robust justification in design and heritage terms</b></p>	<ul style="list-style-type: none"> <li>• The Council considers that the site allocation provides sufficient flexibility.</li> <li>• It is acknowledged that the 2002 site brief is now rather dated, and the Council will be looking into updating the site brief, in conjunction with the landowners, and subject to resources.</li> <li>• The policy on Building Heights within the Plan sets out the context and criteria how taller/tall buildings would be considered, i.e. they would need to be of high architectural design quality and standards, deliver public realm benefits and have a positive impact on the character and quality of the area. The supporting text to the Building Heights policy clearly defines a 'tall' building as a building of 18 metres in height or higher.</li> </ul>
434	Tess Pinto, 20th Century Society	The Society is greatly concerned that the current draft promotes Richmond Station as a site for 'comprehensive redevelopment'. Richmond Station is a fine example of inter-war railway architecture. Given the architectural and historic importance of the building, as well as its clear townscape value within a conservation area, the policy should be redrafted in a way which encourages only conservation-led development, and which explicitly safeguards the	<ul style="list-style-type: none"> <li>• Add reference to the station building and its BTM designation</li> <li>• The adopted site brief acknowledges the constraints provided by the BTM designation; however, it states that visual character lies principally in the façade and booking hall, with the side and rear of the buildings being unattractive and not contributing to the setting.</li> <li>• The Council needs to achieve a balance between making the best use of</li> </ul>

Ref No.	Name / Organisation	Summary of response received	Council's response
		retention and restoration of the 1937 station building.	<p>land, particularly in locations such as key transport interchanges (where there is a growing emphasis on maximising densities) against the site's location within a Conservation Area, and the building's status as a Building of Townscape Merit, which is a non-designated heritage asset. In line with the NPPF (para 135), the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that affect directly or indirectly non designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.</p> <ul style="list-style-type: none"> <li>• Further information in relation to the redevelopment of this site can be found in the adopted site brief, available at <a href="http://www.richmond.gov.uk/richmond_station_planning_brief.pdf">http://www.richmond.gov.uk/richmond_station_planning_brief.pdf</a></li> </ul>
435	Savills on behalf of Thames Water	On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.	Noted
436	Katharine Fletcher, Historic England	This is within the Central Richmond Conservation Area. The policy should state that any redevelopment must be of the highest quality in character with the CA, and CAA. The height of the replacement station will be a key consideration in terms of ensuring this is appropriate to the scale of the conservation area.	<ul style="list-style-type: none"> <li>• Add reference to Central Richmond Conservation Area and that any redevelopment must be of highest quality in character.</li> <li>• Building heights are addressed in the Building Heights policy of this Plan.</li> </ul>
437	Paul Velluet	I wish to raise fundamental objections to proposal SA 18 as presently drafted. I value the distinctive architectural character and significance of the complex, its efficient layout, and above all, the platforms being day-lit and open to the sky and naturally ventilated. Any development taken across and above some or all of the existing tracks and platforms would not only seriously damage the architectural integrity of the existing station complex but would destroy the amenity presently enjoyed by the travelling public.	<ul style="list-style-type: none"> <li>• Add reference to the station building and its BTM designation</li> <li>• The adopted site brief acknowledges the constraints provided by the BTM designation; however, it states that visual character lies principally in the façade and booking hall, with the side and rear of the buildings being unattractive and not contributing to the setting.</li> <li>• The Council needs to achieve a balance between making the best use of land, particularly in locations such as key transport interchanges (where there is a growing emphasis on maximising densities) against the site's location within a Conservation Area, and the building's status as a Building of Townscape Merit, which is a non-designated heritage asset. In line with the NPPF (para 135), the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that affect directly or indirectly non designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.</li> <li>• Further information in relation to the redevelopment of this site can be found in the adopted site brief, available at <a href="http://www.richmond.gov.uk/richmond_station_planning_brief.pdf">http://www.richmond.gov.uk/richmond_station_planning_brief.pdf</a></li> </ul>

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		<b>SA 19 Friars Lane Car Park, Richmond</b>	
438	Savills on behalf of Thames Water	On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.	Noted
439	Peter Willan, Chair for The Friends of Richmond Green	The redevelopment of the Friars Lane Car Park will reduce Richmond town's car parking spaces by around 60 spaces. Whilst this is small in context of total car parking spaces, the impact of increased parking sought on Richmond Green could be considerable negative given the flow of traffic in the town. It is important residents' parking amenity is maintained and where possible improved. Add the following to the site allocation: 'Access to parking facilities other than around Richmond Green will be encouraged through improved signage and other measures so as to avoid additional pressure on the limited and sometimes oversubscribed parking facilities around the Green which has a negative impact on residents' amenity.'	<ul style="list-style-type: none"> <li>• The principal for the redevelopment of this site for residential use was established in 2005 as part of the Unitary Development Plan.</li> <li>• It is acknowledged that there are concerns in relation to potential impacts on parking facilities around Richmond Green; however, this will need to be addressed within a Transport Assessment as part of any planning application.</li> </ul>
440	Katharine Fletcher, Historic England	This lies within the Richmond Riverside CA and is surrounded by grade II listed buildings. The policy wording should reflect these designations and the sensitivity of the site.	<ul style="list-style-type: none"> <li>• Add reference to the Richmond Riverside Conservation Area.</li> <li>• Grade II listed buildings are already referred to in the proposal</li> </ul>
441	Charles Pineles, Planning Spokesman, Richmond Society	We look forward to a full architectural competition, for specialist firms of the highest grade, to meet the brief in a way which will give the town back a much needed, and most welcome, centre.	Noted
		<b>SA 20 Sainsbury's, Lower Richmond Road, Richmond</b>	
442	Peter Dowling, Indigo Planning on behalf of Sainsbury's Supermarkets Ltd	Support for allocation. Sainsbury's is eager to explore options at this site to assist the Council to meet the current and future demand for housing within the Borough. Equally, Sainsbury's is committed to retaining this important existing store. Viability matters need to be considered and flexibility needs to be incorporated into the policy to take account of this, e.g. in relation to the fact that proposals to redevelop supermarkets inevitably necessitate a period of closure and / or a significant loss of trade during construction.	<ul style="list-style-type: none"> <li>• Add reference to acknowledge that any proposal to redevelop the site will inevitably necessitate a period of closure and / or a loss of trade during construction.</li> <li>• However, the Council considers that the existing proposal site and supporting text already provide sufficient flexibility and no further changes are proposed.</li> </ul>
443	Charles Pineles, Planning Spokesman, Richmond Society	We would heartily agree with the council that this site is custom made for "substantial provision of housing units". Indeed the Society always felt the site was more appropriate for housing than for yet another supermarket.	Noted
444	Sarah Stevens, Turleys for British Land	This site along with British Land's site falls with an area identified for potential change. British Land supports the comprehensive development of both sites to optimise their use and provide for new homes.	Noted

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445	Robert Deanwood, Amec Foster Wheeler on behalf of National Grid	Site has been identified as being crossed by or within close proximity to IP/ HP pipelines (Gas Distribution). HP/IP pipelines are normally buried to a depth cover of 1.1 metres, however; actual depth and position must be confirmed on site by trial hole investigation to be monitored by a National Grid representative. Need to liaise with National Grid's Plant Protection team.	<ul style="list-style-type: none"> <li>• Add reference to the adjacent gas compound and gas pipeline</li> </ul>
		<b><i>SA 21 Pools on the Park and surroundings, Richmond</i></b>	
446	Katharine Fletcher, Historic England	The potential for development needs to be considered. The listed status of the Pools building does not necessarily preclude alteration but the significance of the building should first be understood to inform any scheme and ensure that it respects this significance. The justification for complete demolition and rebuilding of the Pools has not been made at this juncture. It should further be noted in the policy that the site lies within the World Heritage Site buffer zone.	<ul style="list-style-type: none"> <li>• It should be noted that more detailed guidance against which future development proposals within the ODP will be considered is currently being drafted through the development of a Supplementary Planning Document for the area. An informal consultation was undertaken in October – November 2016 to help inform the development of that document which will be the subject of further consultation in 2017. T</li> <li>• Add reference to the need to understand the significance of the listed pool complex.</li> <li>• Add reference to the Royal Botanic Gardens, Kew World Heritage Site buffer zone</li> </ul>
447	Charles Pineles, Planning Spokesman, Richmond Society	Whichever team wrote this gets the Gold Star. Hard hitting and courageous, it hits the spot time after time with unremitting clarity: - The cost of maintaining and running. - The buildings age - Tired and unattractive - Internal layout poorly configured Conclusion: should be rebuilt. Congratulations and good luck. There is a significant User Group loyalty to the Old Girl but if the building is out of date and as near unfit for purpose as it can get now, what for the next twenty years? With an annual foot fall in excess of 500,000 we have the strong impression that we are running out of sticking plasters.	Noted
448	Peter Willan, Old Deer Park Working Group	Amend title of proposal site to 'The Pools-on-the-Park and surroundings, Old Deer Park, Richmond'. Add the following wording: 'Any proposed improvements or additional development must ensure the preservation of the special interest of the listed complex and its setting and sustain their significance; preserve or enhance the character or appearance of the conservation area and registered park (and the World Heritage Site buffer-zone) in which the complex and its landscaped setting are located and sustain their significance; and respect the parkland character of the Metropolitan Open Land, avoiding encroachment into the area beyond the boundary of the site and the present public sports changing-rooms and club-room building and the largely redundant and derelict Council maintenance-depot for the Park. Any proposed improvements or additional development should have full regard to the relevant policies set out in The Crown Estate's The Old Deer Park Richmond - Landscape Strategy, 1999'.	<ul style="list-style-type: none"> <li>• It should be noted that more detailed guidance against which future development proposals within the ODP will be considered is currently being drafted through the development of a Supplementary Planning Document for the area. An informal consultation was undertaken in October – November 2016 to help inform the development of that document which will be the subject of further consultation in 2017.</li> <li>• Add reference to the need to understand the significance of the listed pool complex.</li> <li>• Add reference to the Royal Botanic Gardens, Kew World Heritage Site buffer zone</li> <li>• The Old Deer Park Landscape Strategy (1999) was commissioned by the Crown Estate, as landowner, 'to develop estate management policies for their ownership of the Old Deer Park' (Old Deer Park Landscape Strategy 1999 Summary). It is not a document that has been formally adopted by the Council for planning or other purposes and it is not known whether the</li> </ul>

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			<p>Strategy is still being used for estate management purposes by the landowner. In addition, whilst the Strategy makes reference to planning policies, these have been superseded by subsequent planning policies adopted by the Council since its publication. The Council is currently preparing a Supplementary Planning Document for the Old Deer Park which is being undertaken within the context of the Council's planning policies. As the Strategy is a well-researched and informative document it provides useful contextual information for the Council in the development of the Supplementary Planning Document with respect of the historic and ecological attributes of the Old Deer Park.</p>
		<b>SA 22 Richmond Rugby and Richmond Athletic Ground, Richmond</b>	
449	Charles Pineles, Planning Spokesman, Richmond Society	The whole site much in need of comprehensive refurb' for which enabling development will be essential.	Noted
450	Katharine Fletcher, Historic England	This site lies within the World Heritage Site buffer zone which should be referenced. Historic England would like to engage in discussions with the Council before the next draft of the local plan.	<ul style="list-style-type: none"> <li>• Add reference to the Royal Botanic Gardens, Kew World Heritage Site buffer zone</li> </ul>
451	Peter Willan, Old Deer Park Working Group	<p>Amend (and correct) the title of the site to 'The Richmond Athletic Association Ground, Old Deer Park, Richmond'.</p> <p>Add the following wording:</p> <p>'Any proposed improvements or additional development must ensure the preservation of the special interest of the listed complex and its setting and sustain their significance; preserve or enhance the character or appearance of the conservation area and registered park (and the World Heritage Site buffer-zone) in which the complex and its landscaped setting are located and sustain their significance; and respect the parkland character of the Metropolitan Open Land, avoiding encroachment into the area beyond the boundary of the site and the present public sports changing-rooms and club-room building and the largely redundant and derelict Council maintenance-depot for the Park. Any proposed improvements or additional development should have full regard to the relevant policies set out in The Crown Estate's The Old Deer Park Richmond - Landscape Strategy, 1999'.</p>	<ul style="list-style-type: none"> <li>• It should be noted that more detailed guidance against which future development proposals within the ODP will be considered is currently being drafted through the development of a Supplementary Planning Document for the area. An informal consultation was undertaken in October – November 2016 to help inform the development of that document which will be the subject of further consultation in 2017.</li> <li>• Add reference to the Royal Botanic Gardens, Kew World Heritage Site buffer zone</li> <li>• The Old Deer Park Landscape Strategy (1999) was commissioned by the Crown Estate, as landowner, 'to develop estate management policies for their ownership of the Old Deer Park' (Old Deer Park Landscape Strategy 1999 Summary). It is not a document that has been formally adopted by the Council for planning or other purposes and it is not known whether the Strategy is still being used for estate management purposes by the landowner. In addition, whilst the Strategy makes reference to planning policies, these have been superseded by subsequent planning policies adopted by the Council since its publication. The Council is currently preparing a Supplementary Planning Document for the Old Deer Park which is being undertaken within the context of the Council's planning policies. As the Strategy is a well-researched and informative document it provides useful contextual information for the Council in the development</li> </ul>

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			of the Supplementary Planning Document with respect of the historic and ecological attributes of the Old Deer Park.
		<b>SA 23 Stag Brewery, Lower Richmond Road, Mortlake</b>	
452	Lucy Owen, Port of London Authority	Support for inclusion of river related uses	Noted
453	Savills on behalf of Thames Water	Thames Water has concerns regarding wastewater services on this site. There is unlikely to be capacity in this area to support the demand anticipated from this development. Upgrades to the existing infrastructure are likely to be required. It is important not to under estimate the time required to deliver necessary infrastructure. For example: local network upgrades can take around 18 months to 3 years to design and deliver.	<ul style="list-style-type: none"> <li>The concerns are noted. It would be the responsibility of the applicant/developer to carry out an assessment of the existing infrastructure capacity as part of the pre-planning and/or planning application process. In addition, LP23 also applies.</li> </ul>
454	Andrew Dorrian, Transport for London	TfL will continue to work closely with the applicant and council on the development of the brewery linking to the SPD which was adopted by the council.	Noted
455	Katharine Fletcher, Historic England	Welcome the proposed retention of BTMs within the site and recommend that this requirement is included in the policy. The policy should also refer to the need to take into account Mortlake Conservation Area that partially covers and also adjoins the site, and the listed buildings (grade II) that adjoin the site to the north.	<ul style="list-style-type: none"> <li>Reference to the need to retain the BTMs is already included.</li> <li>Add reference to the Mortlake Conservation Area and to the listed buildings (Grade II) to the north of the site</li> </ul>
456	Tim Catchpole, Planning Representative Mortlake with East Sheen Society	<p>More evidence is required for the need of a new 6-form entry secondary school, plus a sixth form, and the Council's decision to change the school allocation from a much smaller primary school to a large secondary school without public consultation.</p> <p>Concerns about poor PTAL level and traffic/congestion, loss of part of sports grounds which is OOLTI.</p> <p>Have the Council considered Barn Elms instead for locating a secondary school at that site? It could be a very special circumstance in MOL on Barn Elms.</p> <p>Affordable housing in brackets suggests it might not happen – need to change this.</p> <p>Planning brief for site needs to be re-adopted due to the change from primary to secondary school, the whole site is now within a Conservation Area and the brief gave no indicated of numbers of housing units expected, including the impact on traffic generated.</p> <p>Bullet points do not cover heights of buildings and density of development including its traffic impact on Lower Mortlake Road, given the Chalker's Corner junction and Shen Lane level crossing present serious constraints to any increase in traffic capacity.</p>	<ul style="list-style-type: none"> <li>The need for a 6-form entry secondary school, plus a sixth form, has been established in the Council's School Place Planning Strategy in 2015. As part of this, alternative locations in the area were considered. The Council disagrees that Barn Elms, which is designated MOL, would provide a more sustainable location for development.</li> <li>The Council does not consider it necessary to redo the planning brief for this site as the change from the primary to the secondary school can be addressed as part of the Local Plan. Also note that the Local Plan is subject to a minimum of three rounds public consultation, and the change from a primary to a secondary school was included in the consultation on the scope of the review of the policies early 2016, as well as in the consultation on the draft Plan in the summer 2016.</li> <li>The reference to affordable housing is consistent throughout the Plan's site allocations.</li> <li>Heights of buildings and density are covered in other policies of the plan.</li> <li>Any redevelopment proposal will require a full Transport Assessment, as part of which surveys will need to be carried out to ensure there are not demonstrably negative impacts on the wider area and residents' amenity.</li> </ul>
457	Neil Henderson,	Support for inclusion of site, but implications of including a new secondary	<ul style="list-style-type: none"> <li>The Council places significant priority on the delivery of a secondary school</li> </ul>

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	Gerald Eve on behalf of Reselton Properties Ltd	<p>school will need to be fully explored. Suggest amended wording: "...<b>The provision of an on-site new 6-form entry secondary school, plus sixth form, will be required sought...</b>"</p> <p>Amend 3<sup>rd</sup> bullet point to: "<b>There is a clear need for a new 6-form of entry secondary school, plus a sixth form, in this area, as set out in the Council's School Place Planning Strategy. Therefore, the Council expects <u>will seek any redevelopment proposal to allow for the provision of this school.</u></b>"</p> <p>Policy needs to be flexible in relation to new open space and the sports field; amend as follows:</p> <p>"... <b>river-related uses as well as sports and leisure uses, including the <u>re-provision and upgrading of the playing field</u> . ...."</b></p> <p>Flexibility is required in relation to employment uses; amend as follows: ".... <b>Therefore, it is expected that this site will provide a <u>substantial mix of employment uses (B uses) including which may include lower cost units suitable for small businesses</u> .....</b>"</p> <p>Add additional bullet point, acknowledging that overall planning obligation and contribution package will be subject to viability:</p> <p><b>"The Council recognises that the priority of infrastructure requirements may affect other planning obligations and contributions sought, including affordable housing. The basis of this will be treated on its merits, and subject to detailed viability appraisal."</b></p>	<p>on this site, as such, no change is proposed in this regard.</p> <ul style="list-style-type: none"> <li>• In relation to the playing fields, a change is proposed to refer to retention and/or re-provision</li> <li>• The Council considers the proposal to be sufficiently flexible and proposals can be subject to viability appraisals, which will be assessed and treated on its merits and on a case by case basis; however, it is not considered necessary or appropriate to refer to detailed viability appraisals within the site specific proposals. Section 13 of the Local Plan also deals with viability.</li> </ul>
458	David Deaton	<p>Support new village heart for Mortlake. Inconsistency between the site brief and site allocation with reference to the secondary school. This should be delivered as well as the other commitments set out in the brief.</p> <p>There should be no increase in the height or the density of housing compared with that envisaged in the planning brief.</p> <p>Support for change in bus turnaround facility from Avondale Road to Stag Brewery.</p>	<ul style="list-style-type: none"> <li>• Noted. Heights of buildings and density are covered in other policies of the plan.</li> </ul>
		<b><i>SA 24 Mortlake and Barnes Delivery Office, Mortlake</i></b>	
459	Savills on behalf of Thames Water	<p>On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.</p>	<p>Noted</p>
460	Tim Catchpole, Planning Representative Mortlake with East Sheen Society	<p>Support redevelopment for employment generating uses if it is declared surplus to requirement. In addition to offices there should be scope for any service industry including affordable units, which needs to be in the area and is currently missing.</p>	<ul style="list-style-type: none"> <li>• Noted. This is already covered in the Employment and Local Economy policy.</li> </ul>
		<b><i>SA 25 Kew Biothane Plant, Mellis Avenue, Kew</i></b>	
461	Cllr David	<p>An ideal location for a community asset (such as a community centre) and</p>	<ul style="list-style-type: none"> <li>• The site is not located within a town centre or an area of mixed use and</li> </ul>

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	Linnette	should form part of any design brief for this site.	may not be the most appropriate location for a community centre. However, in line with other policies in the Plan, including on River Corridors, public access to the riverside site will be expected as part of any redevelopment scheme, which would be of considerable wider public benefit.
462	Savills on behalf of Thames Water	Generally support site allocation but object to the penultimate bullet point in relation to MOL. This is not in conformity with the NPPF. NPPF allows for limited infilling or partial or complete redevelopment of previously developed sites (brownfield land), whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development. Delete penultimate bullet point and replace with: 'Parts of the site are designated as Metropolitan Open Land. Development within Metropolitan Open Land should be consistent with the NPPF such that redevelopment should not have a greater impact on the openness of the Metropolitan Open Land, unless very special circumstances apply.'	<ul style="list-style-type: none"> <li>Existing policies within the Plan, including on MOL/Green Belt will apply on any development proposal for this site, and as such, there is no need to specifically refer within the site-specific proposal to the fact that exceptions or very special circumstances could be applied.</li> </ul>
463	Savills on behalf of Thames Water	The Kew Biothane plant is currently a Thames Water site. Thames Water will be working with the developer to ensure that the foul flows from the development can be accommodated. Given the network capacity constraints we would recommend that the Local Planning Authority should require the developer to provide a detailed drainage strategy informing what drainage infrastructure is required, where, when and how it will be delivered.	<ul style="list-style-type: none"> <li>Noted</li> </ul>
		<b>SA 26 Telephone Exchange and 172-176 Upper Richmond Road West, East Sheen</b>	
464	Savills on behalf of Thames Water	On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.	Noted
465	Tim Catchpole, Planning Representative Mortlake with East Sheen Society	No specific comments	Noted
		<b>SA 27 Barnes Hospital, East Sheen</b>	
466	Liz Ayres, Richmond Clinical Commissioning Group	The possibility of locating primary and /or community health services on this site should be further investigated.	<ul style="list-style-type: none"> <li>Add reference to the need to investigate the possibility of locating primary and /or community health services on this site.</li> </ul>

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467	Tim Catchpole, Planning Representative Mortlake with East Sheen Society	Concerns about developing part of this site alongside the remnant hospital for a primary school. Our preference for this site alongside the remnant hospital is for a housing development, including social housing, for which a scheme already exists.	<ul style="list-style-type: none"> <li>The Council's <a href="#">School Place Planning Strategy 2015-24</a> sets out the need for a primary school in this area.</li> <li>The site is an existing community / social infrastructure use, and therefore such uses should be fully explored and options discounted in line with other policies in the Plan before considering other uses, such as residential.</li> </ul>
468	Katharine Fletcher, Historic England	Support retention of BTMs, which are distinctive, and fall into category in Annex 2 of the NPPF. National policy promotes development that responds to local character and history and we note that the site adjoins the Queens Road conservation area. Need to respect the setting of the conservation area, and particularly the relationship with Mortlake cemetery, should also be referenced. Need for Masterplan unless covered in Village Plan SPD	<ul style="list-style-type: none"> <li>Add reference to Queens Road Conservation Area and Mortlake cemetery</li> <li>The Council does currently not envisage developing a Masterplan for this site as it is considered that the Barnes Village Planning Guidance SPD contains sufficient guidance in relation to the design and character. Therefore, any proposed scheme is expected to address the guidance within this SPD.</li> </ul>
469	Savills on behalf of Thames Water	Thames Water has concerns regarding wastewater services on this site. There is unlikely to be capacity in this area to support the demand anticipated from this development. Upgrades to the existing infrastructure are likely to be required. It is important not to under estimate the time required to deliver necessary infrastructure. For example: local network upgrades can take around 18 months to 3 years to design and deliver.	<ul style="list-style-type: none"> <li>The concerns are noted. It would be the responsibility of the applicant/developer to carry out an assessment of the existing infrastructure capacity as part of the pre-planning and/or planning application process. In addition, LP23 also applies.</li> </ul>
<b><i>MOL boundary change at Harrodian School, Barnes</i></b>			
470	Bethany Evans, NLP Planning on behalf of The Harrodian School	Support for MOL boundary change	Noted
471	Celeste Giusti, Greater London Authority on behalf of Mayor of London	In this instance the Mayor has no objection as the site is built up and he is satisfied it no longer performs the function of MOL.	Noted
<b><i>Chapter 12 – Comments in relation to other sites / site omissions</i></b>			
472	James Sheppard, CBRE on behalf of LGC Ltd	LGC Ltd (Teddington) should be allocated as Mixed Use (employment/residential), allowing for enabling development to support the LGC Ltd business. Note that two buildings, previously owned by LGC Ltd, fronting Queen's Road have subsequently been sold by LGC Ltd and now benefit from a change of use to residential. Object to identification of site as 'Locally Important Industrial Land and Business Park'. LGC Ltd can only continue to operate from within LBRuT if enabling residential	<ul style="list-style-type: none"> <li>The Council has carefully identified existing industrial land and business parks, based on thorough evidence and research, as set out within the Council's borough-wide <a href="#">Assessment of Light Industrial and Storage Stock</a> and <a href="#">Appendices</a>.</li> <li>The Council's aim is to retain industrial floorspace on this site in order to ensure a balanced economy in the borough and therefore it will not be designated as a site for mixed-use redevelopment.</li> <li>Richmond borough is designated as 'restrictive transfer' in the London Plan which means that industrial land should not be released for other uses. In</li> </ul>

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		<p>development can be implemented on part of the site to cross-subsidise the development of a new fit-for-purpose facility.</p> <p>Proposed allocation would make positive contribution to housing land supply in the borough, whilst also supporting and promoting an important local and regional employer.</p>	<p>addition the Council's own evidence demonstrates a shortage of industrial sites in the borough. Therefore the presumption against the loss of industrial sites in the identified areas is justified.</p> <ul style="list-style-type: none"> <li>• The Council's existing research is also supplemented by an update of the Employment Land Study. This research is underway to establish a comprehensive, up-to-date and robust evidence base in relation to employment land in the borough. This is to be published alongside the Publication version of the Local Plan.</li> <li>• It needs to be acknowledged that the borough has a very limited supply of industrial floorspace and demand for this type of land is high. The London Plan states that a 'restrictive' approach towards the transfer of industrial land to other uses should be adopted in the borough, which means that industrial land should not be released for other uses. Therefore, in order to deliver this key priority and strategic objective, locally important industrial land and business parks, which are of particular importance for warehousing, distribution, storage and other industrial employment as well as locally important creative industries and other key employment facilities, are identified in the Local Plan. Any loss of industrial space within these areas will be strongly resisted. This is to ensure that the borough can continue to provide for local business and employment needs.</li> <li>• In addition, the GLA's Industrial Land Supply and Economy Study (2015) demonstrates that the borough has a very limited supply of industrial land, with only 17.3 hectares of general and light industrial space (B2 and B1(c)), and 8.1 hectares of warehousing and storage (B8) facilities; this is amongst the lowest of all the London boroughs. It is expected that the 'restrictive transfer' approach will be retained within the next London Plan. Therefore there is a presumption against loss of any industrial or other such employment space in all parts of the borough, and any loss will be particularly strongly resisted in the listed important industrial land and business parks.</li> <li>• The Council is able to meet its annual housing target without releasing industrial land and business parks. Early analysis indicates that for the financial year of 2015/16, in excess of 500 units have been completed, which is well above the current London Plan target of 315 homes per annum.</li> </ul>
473	Jamie Wallace, CgMs on behalf of Notting Hill Home Ownership	<p>St Clare Business Park should not be identified as locally important industrial land and business park, and instead should be allocated for mixed use development; suggest as follows:</p> <p>"A comprehensive mixed use development comprising employment floorspace (B1) and residential development with associated landscaping and parking."</p>	<ul style="list-style-type: none"> <li>• No change. St Clare Business Park will retain its designation as a locally important industrial land and business park. It is a key site for the Council for the long term provision of warehousing, distribution, storage and other industrial employment as well as creative industries and other key employment facilities. It is recognised that some enabling development</li> </ul>

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			<p>may be required as part of any future redevelopment in order to re-provide adequate industrial employment floorspace on the site, but this can be dealt with as part of any forthcoming proposals.</p> <ul style="list-style-type: none"> <li>• Also see responses to comments above under 307, 313 and 320.</li> </ul>
474	Tom Sadler, Bilfinger GVA on behalf of Defence Infrastructure Organisation	<p>Kneller Hall should be allocated for a mix of uses as decision has been made to close and dispose of the site. Site has potential to contribute towards meeting local and wider strategic needs through alternative use and development. Draft Local Plan fails to consider the role of the Kneller Hall site as a soon to be vacant Brownfield site and in meeting the future development needs of the Borough.</p> <p>Site is suitable for a range of alternative uses (subject to needs and demand), including:</p> <ul style="list-style-type: none"> <li>- Public, community or social Infrastructure (e.g. primary school);</li> <li>- Employment;</li> <li>- Hotel or leisure uses; and</li> <li>- Residential.</li> </ul> <p>Need to acknowledge desperate need for more homes and make use of opportunities, such as Kneller Hall, to boost supply of housing.</p> <p>Key attributes of site include Grade II Listed Buildings, openness and character of MOL, sports pitches and playing fields, existing trees and green spaces, existing views and vistas, and features of high ecological value.</p> <p>Need to include a requirement for a Masterplan to be prepared in partnership with the LPA, stakeholders and the community to determine the appropriate mix, scale and form of the development.</p> <p>Any future use or development on the site will need to respond to the characteristics identified within this section, preserving and enhancing important attributes where possible.</p>	<ul style="list-style-type: none"> <li>• A site allocation is to be included for Kneller Hall in the Publication Plan.</li> <li>• The proposal site acknowledges that this site is suitable for a range of uses and provides flexibility in this regard.</li> <li>• The proposal site acknowledges the key attributes of the site, including the Listed Building, MOL, playing fields, green spaces etc.</li> <li>• The proposal site acknowledges that a Masterplan / site development brief will be prepared in conjunction with the Council and in cooperation with local communities.</li> </ul>
475	Sam Hobson, Quantum Group	<p>Site is substantially underutilised and has been used privately with only limited and occasional third party use. Site is designated Asset of Community Value since March 2016.</p> <p>Our aims are to open up the majority of the site for public access to be used for sport and recreation; and to develop approximately one third of the land as a Continuing Care Retirement Community (retirement/extra care/care home accommodation) that may include health care and other community uses for the wider community.</p> <p>Suggest new site allocation for the 'Former Imperial College Private Ground, Udney Park Road, Teddington', which supports the continued use of the fields for sports purposes. Comprehensive development proposal and partial development of a maximum of 2 ha for Class C2 extra care accommodation, care home accommodation and community and health facilities.</p>	<ul style="list-style-type: none"> <li>• The Council will not allocate this site for residential / extra care accommodation or any other built development. However, the Council will designate the land as Local Green Space. See responses to comments 145 above and 477 below.</li> </ul>

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		<p>The sport and recreational facilities will be required to be substantially upgraded and improved and a long-term ownership, management and maintenance plan prepared that will ensure on-going financial stability and community access or ownership for any proposals to be supported by the Council.</p> <p>Need to recognise that enabling development is needed to realise the benefits the site could bring to the community.</p> <p>At least 3.2 ha would be publicly accessible open space for sport and recreation, and overall significant benefits to the wider community.</p>	
476	Savills on behalf of Thames Water	<p>Hampton Water Treatment Works should remain allocated for redevelopment (as set out in the UDP, H1) for conversion of redundant Thames Water buildings for business, residential and other compatible uses, together with re-use of the associated filter beds and surrounding land. The removal of the allocation does not meet the tests set out in the NPPF and is not justified.</p> <p>1) Karslake and Ruston Ward Buildings – a pre-application advice in respect of these buildings was submitted to the Council on 5 August 2016 for proposed conversion of the buildings to provide 10 residential units. The buildings are surplus to Thames Water's requirements and the necessary operations are now undertaken on the wider site. This should be allocated for residential conversion. Alternative uses have been considered but they would not generate enough value to allow refurbishment and maintenance of existing listed buildings. The south portion of Ruston Ward will remain as storage, workshops and offices for use by the Thames Water.</p> <p>2) Remainder of current H1 allocation, which remains operation at present, should be carried over in Local Plan in the event that this area could become surplus to requirements. The allocation for conversion of redundant Thames Water buildings for business, residential and other compatible uses together with re-use of the associated filter beds and surrounding land therefore remains relevant and should be included within the new Local Plan.</p>	<ul style="list-style-type: none"> <li>• The NPPF policy in relation to Green Belt as well as the local policy on MOL/Green Belt allow for exceptions to be made to Green Belt policies. The Council considers that it is more appropriate to deal with any future redundant Thames Water buildings as part of planning applications, as and when they are declared surplus to requirements. Para 89 of the NPPF sets out the exceptions that can be considered within Green Belt, and other policies within the Local Plan, such as in relation to employment, would also need to be applied. Also note that the local policy allows for essential utility infrastructure within the Green Belt/MOL.</li> <li>• Kerslake and Ruston Ward Buildings will not be allocated for residential use. Officers have previously advised that employment policies must be addressed first, with marketing evidence to reflect the policy requirement for the buildings to be restored for commercial use (similar to the adjacent buildings) or possibly a mixed use scheme. Appendix 5 of the emerging Local Plan sets out the approach that the Council expects applicants to take in relation to marketing.</li> </ul>
477	Mark Jopling, The Teddington Society and the Friends of Udney Park Playing Fields	Local Green Space Designation for Udney Park Playing Fields (see comments under 145 above)	<ul style="list-style-type: none"> <li>• Change agreed. The site will be allocated as a Local Green Space.</li> </ul>
478	Savills on behalf of Thames Water	Land to West of Stain Hill West Reservoir, Hampton Water Treatment Works, Upper Sunbury Road should be allocated for residential development.	<ul style="list-style-type: none"> <li>• This land is designated Green Belt. As set out within the Local Plan's Spatial Strategy, the borough's parks and open spaces provide a green lung for south/west London. In addition, there is a presumption against the loss of, or building on, greenfield sites as well as MOL/Green Belt in this borough, unless very special circumstances and/or an exception to relevant policies can be demonstrated. In addition, the Plan demonstrates that the Borough</li> </ul>

Ref No.	Name / Organisation	Summary of response received	Council's response
			<p>can meet its housing needs without releasing open land that is protected by designations such as Green Belt or MOL. Therefore, a borough-wide Green Belt or MOL review is not undertaken as part of this Local Plan, and there is no proposal to release any land that is designated Green Belt or MOL. The site is also designated as Other Site of Nature Importance and thus of biodiversity / ecological value. No change.</p>
479	Savills on behalf of Thames Water	Hydes Field, Land to North of Hampton Water Treatment Works, Upper Sunbury Road should be allocated for residential development.	<ul style="list-style-type: none"> <li>This land is designated Green Belt. As set out within the Local Plan's Spatial Strategy, the borough's parks and open spaces provide a green lung for south/west London. In addition, there is a presumption against the loss of, or building on, greenfield sites as well as MOL/Green Belt in this borough, unless very special circumstances and/or an exception to relevant policies can be demonstrated. In addition, the Plan demonstrates that the Borough can meet its housing needs without releasing open land that is protected by designations such as Green Belt or MOL. Therefore, a borough-wide Green Belt or MOL review is not undertaken as part of this Local Plan, and there is no proposal to release any land that is designated Green Belt or MOL. The site is also designated as Other Site of Nature Importance and thus of biodiversity / ecological value. No change.</li> </ul>
480	Laura Stritch, Transport for London	<p>Twickenham Bus Station, Station Yard, Twickenham, of which London Buses are the freeholder of Twickenham Bus Station, Station Yard, is identified as proposal site TW2 in the Twickenham Area Action Plan for the provision of a residential scheme up to 3-4 storeys.</p> <p>It is possible this development will retain some bus standing on part of the site, either alongside or under a development. Should remain an allocated proposal and form part of the Local Plan.</p>	<ul style="list-style-type: none"> <li>Noted. However, this is not applicable as the Local Plan will not amend the existing site allocations as adopted as part of the Twickenham Area Action Plan.</li> </ul>
481	Peter Willan, Old Deer Park Working Group	<p>Boundaries in relation to MOL, POS and Richmond Town Centre: Council needs to resolve significant anomalies relating to the definition of the boundaries of Metropolitan Open Land, Public Open Space and the Richmond Town Centre insofar as they relate to the Old Deer Park.</p> <p>Need for a new Proposals Map showing potential adjustments to the boundaries.</p> <p>Old Deer Park Working Group urges the Council to address and resolve these anomalies.</p>	<ul style="list-style-type: none"> <li>The changes to the boundaries as suggested by the Old Deer Park Working Group have been considered relatively recently through development of the Development Management Plan (DMP). There has been no material change of circumstances since the DMP was adopted and therefore there is no justification to support changes at this point in time.</li> <li>In relation to the town centre boundary, it should be noted that para 40 of the NPPF sets out that local authorities should seek to improve the quality of parking in town centres so that it is convenient, safe and secure, including appropriate provision for motorcycles. In addition, local authorities should set appropriate parking charges that do not undermine the vitality of town centres. Parking enforcement should be proportionate. Furthermore, the Ministerial Statement published in March 2015 by the then Secretary of State sets out that this government is keen to ensure that there is adequate parking provision both in new residential developments and around our town centres and high streets.</li> </ul>

Ref No.	Name / Organisation	Summary of response received	Council's response
482	Charles Pineles, Planning Spokesman, Richmond Society	Richmond Society endorses comments by Old Deer Park Working Group in forming its policy towards the future of the Park.	Noted.
483	Tim Catchpole, Planning Representative Mortlake with East Sheen Society	New site allocation for Mortlake Station, which was in previous version of the plan. The land on both sides of the station is used for the sale of timber. On the north side of the station the timber yard, which has no room to expand outwards, is instead expanding upwards and, whilst we have no objection to the timber yard per se - it provides an invaluable service - we are much concerned about its visual appearance and also about the generation of lorry traffic next to a crowded level crossing. There are issues here that need to be addressed.	<ul style="list-style-type: none"> <li>No change. It should be noted that site allocations are for addressing existing and future needs, or where sites are becoming surplus to requirements and thus potentially available for alternative uses. Whilst it is acknowledged that the existing timber yard may not contribute positively to the appearance of the local area, and the associated lorries can cause problems, it is an existing industrial site that provides valuable services as well as local employment opportunities, which the Council seeks to support and retain. Issues in relation to existing traffic problems are best addressed by the occupier, or may be matters for Council or police enforcement or consideration of additional parking controls.</li> </ul>
<b>Chapter 13 – Implementation</b>			
484	Janet Nuttall, Natural England	Natural England is pleased that Green Infrastructure provision will be included within the Infrastructure Delivery Plan. We trust that a Green Infrastructure Strategy for the Borough will set out objectives and targets to address areas of deficit and mitigate the direct and indirect impacts of Local Plan development. This will help to quantify GI requirements and levels of developer contributions through Planning Obligations and/or Community Infrastructure Levy (CIL). Natural England welcomes proposal to revise the monitoring framework to reflect the adoption of the new Local Plan policies, informed through the Sustainability Appraisal process.	<ul style="list-style-type: none"> <li>Noted.</li> </ul>
485	Dale Greetham, Sport England	13.2.8: Unsound. The first bullet point should be more specific about which sports facilities are included.	<ul style="list-style-type: none"> <li>See the Infrastructure Delivery Plan and Infrastructure Delivery Schedule for further details.</li> </ul>
<b>Appendices</b>			
486	Richard Geary	Glossary - Conservation Area: An area deemed fit for conserving in character, unless a developer requests these considerations to be ignored. Enforced against residents because the Council does not understand the meaning of democracy (or where their finances come from).	<ul style="list-style-type: none"> <li>Noted. Current wording to be retained.</li> </ul>
487	Sarah Stevens, Turleys for British Land	It would be useful to include a definition of "social infrastructure" in the Glossary to reflect that of the London Plan's definition.	<ul style="list-style-type: none"> <li>This is sufficiently covered in the Social Infrastructure and Community Facilities policy.</li> </ul>

**Table 4:** Summaries of comments on policies and site allocations, including general comments and omissions from Plan, and Council's response

## 5. Summaries of responses received in relation to the Sustainability Appraisal and Council's response

Ref No.	Name / Organisation	Summary of response received	Council's response
488	Krystyna Kujawska	Objection to description of site SA 7 as partly vacant and derelict. Scamps have invested significant funds into the site to improve the appearance of the area and provide safe and attractive play areas for the children.	<ul style="list-style-type: none"> <li>Description to the site, SA 7 will be altered</li> </ul>
489	Janet Nuttall, Natural England	<p>There is an absence of reference to an HRA.</p> <p>Ensure longer-ranging impacts such as air and water, and visitor pressure are fully considered for policies, site allocations alone and in combination and that sufficient mitigation is identified to address any adverse effects.</p> <p>SA should specifically refer to nationally and internationally designated sites within the Borough, and their conservation objectives. Need to refer to Natural England's SSSI Impact Risk Zones to inform the Local Plan SA/HRA and the planning application process.</p> <p>NE supports the SA objectives, methodology and framework and concludes that draft Local Plan, both its policies and site allocations.</p> <p>It is not clear whether the SA has considered impacts such as public access pressure on designated sites such as Richmond park SSSI, SAC, NNR and Bushy and Home Park SSSI. Proposals likely to add to this pressure, alone and in-combination with other allocations within Richmond and adjacent boroughs, must be carefully assessed and mitigation be identified to address impacts</p> <p>SA2 is assessed as having negative impacts on biodiversity and green infrastructure as the site is entirely 'OSNI. The SA states that any redevelopment scheme would need to take account of the biodiversity value, trees and designated open land, ensuring that these designations are not impacted upon. Policy SA2 should be amended accordingly to secure this requirement.</p> <p>This also applies to other allocations where impacts on biodiversity have been identified through the SA including SA3, SA9, SA11, SA14, SA15, SA16 and SA27.</p> <p>A strategic approach needs to be taken to green infrastructure to ensure relevant development contributes to objectives to mitigate any direct and indirect impacts on existing GI. Predicted impacts on the natural environment, including landscape, soils and public access should be addressed through mitigation secured in the relevant site allocation policies.</p>	<ul style="list-style-type: none"> <li>HRA is underway. Its findings will be referred to.</li> <li>Alterations and revisions will be made to the SA throughout the Plan process</li> <li>The nationally and internationally designated sites and their conservation objectives will be added to the text</li> <li>Not a local Plan matter. The SSSI Impact Risk Zones may be considered for inclusion in a Council GIS systems review.</li> <li>Will review possible impacts of visitor pressure on accessible GI sites</li> <li>Cumulative impacts are addressed in the SA</li> <li>The SA of these policies will be reviewed taking account of biodiversity and other Sustainability objectives</li> <li>The All London Green Grid (as set out in the London Plan All London Green Grid SPG and associated Area Frameworks) which provides the strategic framework for the delivery of green infrastructure in London: <a href="https://www.london.gov.uk/what-we-do/environment/parks-green-spaces-and-biodiversity/all-london-green-grid">https://www.london.gov.uk/what-we-do/environment/parks-green-spaces-and-biodiversity/all-london-green-grid</a></li> <li>General policies in the draft Local Plan such as LP12 and LP15 also apply to allocated sites</li> </ul>

**Table 5:** Summaries of comments on Sustainability Appraisal and Council's response