

All responses received to the [Pre-Publication version of the Site Allocations Plan](#)
 Consultation from 1 October – 12 November 2013



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

Respondent reference no.	Name/Organisation
1.	Julie Hill
2.	Lucy Owen, Port of London Authority
3.	Hilary Bishop, Telereal Trillium
4.	Rich Geary
5.	Andrew Maywood
6.	Lisa Charles
7.	Caroline Brock, Kew Society
8.	Neil Wilton
9.	Janice Merritt
10.	Bernadette Bisdee
11.	Richard Knight
12.	Christopher Bligh
13.	Andy Taylor
14.	Sarah Dietz
15.	Michelle Hatton Smith
16.	Eve Whitby
17.	Charles Gilby
18.	Ray Norbury
19.	Timothy Gilby
20.	Alistair Grills, Alistair Grills Associates
21.	Alistair Grills, Alistair Grills Associates on behalf of MMC Investments Ltd
22.	Jill Paterson
23.	Catherine Stephens
24.	Joan Senior
25.	Clare Longstaff
26.	Richard Booter (RPS) on behalf of Mr S. Oxley
27.	Richard Turk
28.	Gloria Shearer

Respondent reference no.	Name/Organisation
29.	Jill Fielder
30.	Mark Lankester
31.	Andrew Wallace
32.	Dr Anthony Dempsey
33.	Nicola Gill, Mortlake with East Sheen Society
34.	James Page, Richmond and Twickenham Green Party
35.	Ian Anderson
36.	Peter Udell
37.	Julian Austin, AMEC on behalf of National Grid
38.	Elizabeth George
39.	Rupert Gale
40.	Jo Jamieson
41.	Peter Baker
42.	Claire Davies, DTZ on behalf of Royal Mail Group Ltd
43.	Angela Cavill
44.	Dominique Jabbour
45.	Mary Ironmonger
46.	Richard Parish, English Heritage
47.	Jo Liddell
48.	Amanda Hunt
49.	Samantha Shailer
50.	Anthony Davies
51.	Edward Davies
52.	Deborah Hawkins
53.	Tabitha Hennah
54.	Jeff Smith
55.	Martin Wood
56.	Stephen Pope
57.	John Doran

Respondent reference no.	Name/Organisation
58.	Aiden Farelly
59.	Barnet Heeley
60.	Ed Bellamy
61.	Rob Haines
62.	Jeff Talbot
63.	Cllr Suzette Nicholson
64.	Lynne Alexander
65.	David Chick
66.	David Walch
67.	Karen Chuck
68.	Natalie Nesbitt
69.	Jo O'Hagan
70.	Cllr Gareth Roberts
71.	Denis and Mary Chapman
72.	Angela Barnwell
73.	Kelly Hill
74.	Daniela Folkes
75.	Anna Hemming
76.	Nicola Frinneby Wake
77.	Karin Noble
78.	Clare Snell
79.	Michael Castleton
80.	David Rose
81.	Gareth Harper
82.	John Curtis
83.	Lucy Soleri
84.	Mary Smith
85.	John and Sandra Preston
86.	Karen Pickles
87.	Vince Mc Caughy
88.	Rebekah Knott
89.	Jolyon Knott
90.	Elaine Davies
91.	Victoria Phillips
92.	Rachel Hughes
93.	Suzie Rowe
94.	R G Young, C. G. & W. Young Ltd
95.	Gwen Wilkinson

Respondent reference no.	Name/Organisation
96.	Heather and Eddie c/o Whitton Restroom
97.	Helen Noble
98.	Peter Collins
99.	Rob Gray, FORCE
100.	Freda Gilby
101.	G. Gilby
102.	Linda Rees
103.	John N. Smith, CgMs on behalf of our the Mayor's Office for Policing and Crime
104.	Charles Muriithi, Environment Agency
105.	Geoff Armstrong, Armstrong Rigg Planning on behalf of Taylor Wimpey West London
106.	Huw Williams, CgMs on behalf of Richmond Athletic Association
107.	Freddie Clegg, Marston Properties
108.	Bridget Clements, Whitton Business Association
109.	Derek Heath
110.	J. Buncher
111.	P. M. Etter
112.	Tracey Wilkins
113.	Philip Wilkins
114.	S.J. Bailey
115.	M. Austin
116.	Silas Willoughby, Surrey County Council
117.	Paul Velluet on behalf of The Old Deer Park Working Group
118.	Cllr Martin Elengorn, RuT LD Councillors' Group
119.	Piotr Behnke, Natural England
120.	Paul Hampartsoumian
121.	Kevin Scott, Kevin Scott Consultancy
122.	Cllr Elloy for Fulwell and Hampton Hill Councillors
123.	Francis McInerny
124.	Clare Novakovik
125.	Cllr Piers Allen
126.	Carmelle Bell, Savills on behalf of Thames Water
127.	Mary Gray
128.	Stephen Russell
129.	Dr Timothy Lester

Respondent reference no.	Name/Organisation
130.	Jean Gibson
131.	Philip Allin, Boyer Planning on behalf of Axiom Land
132.	James Hadden, Stiles Harold Williams Partnership LLP
133.	Dale Greetham, Sport England
134.	Alison Davey, Teddington Business Community
135.	Alison McKay, Colliers International on behalf of Greggs PLC
136.	Cllr Janet Langhorne
137.	Matthew Roe, CgMs on behalf of Park Property Developments
138.	Francine Bates, Mortlake Brewery Community Group
139.	Jen Osorio
140.	Ann Wise
141.	David Hussey, Highways Agency
142.	Ciara Whelehan, URS on behalf of South Eastern Power Networks plc
143.	Roger Stanley
144.	DE & J Levy LLP on behalf of Mr Gerald Green
145.	Patricia Whitfield, Chairman of Whitton Restroom(+ petition signed by 47 people)
146.	Brenda Stone
147.	M. Alderson
148.	Edward Landor, eLANDORassociates on behalf of Iceland Foods Limited
149.	Jan Marriot, RuT Forum for Older People
150.	Douglas Craik
151.	Marcus Simmons
152.	Catherine Widdowson, Nathaniel Lichfield & Partners on behalf of St Mary's University College

Respondent reference no.	Name/Organisation
153.	Max Millington
154.	Noel Reeve
155.	Prof. Glenn Robert
156.	Molly Gartland
157.	Joanne Merritt, Chair Stanley Primary Governing Body
158.	Susan Woodbridge
159.	Anthony Jenni
160.	Steve Hawkes, Managing Director Hamilton Motor Factors Ltd
161.	Dr Kevin Gelly
162.	James Tovey
163.	Mark Worledge
164.	Paul Lonsdale
165.	Lucy Soleri
166.	Howard Vie
167.	Michael Foss, Convenor, Teddington Society Planning Group
168.	Hayley Phipps, Nathaniel Lichfield & Partners on behalf of The Harrodian School Limited
169.	Kevin Goodwin, CgMs on behalf of Goldcrest Land
170.	Sarah Considine, Greater London Authority (also Transport for London where indicated)
171.	Sati Panesar, DHA Planning & Development on behalf of Francis H Newman (Shipyards) Limited
172.	Murray Hedgecock
173.	Ellen Gates for The Twentieth Century Society
174.	Paul Zieleniewski
175.	Cllr Liz Jaeger

Chapter 1 – Introduction
Chapter 2 – Meeting Needs

Detailed comments – where respondent supporting it:

Ref. no.	Name/Organisation	Detailed comment
149	Jan Marriot, RuT Forum for Older People	2.2.10 – commendable decision
149	Jan Marriot, RuT Forum for Older People	2.2.12 – good – this decision will avoid some of the problems that have arisen at this site
149	Jan Marriot, RuT Forum for Older People	2.2.14 - good
149	Jan Marriot, RuT Forum for Older People	2.4.3 – renewal and modernisation, mixed schemes is important and a very good idea. The business and office development plan appears to have a good balance. Commerce within residential areas needs careful consideration but the borough benefits with this mix as it retains the attractive aesthetic environment.
149	Jan Marriot, RuT Forum for Older People	2.8.2 Points a) b) c) and d) are commendable
7	Caroline Brock, Kew Society	<p>1. Employment: on page 18, paragraphs 2.4.6 and 2.4.7 you set out your concerns over the Government's policy on extending, for 3 years, permitted development rights to allow change of use in some circumstances from office space to residential. We support your concerns and we agree that in certain circumstances, which you have set out, Article 4 Directions should be applied in order to require planning permission to be obtained.</p> <p>2. Transport: on page 22, paragraph 2.5.4 you refer to the Local Implementation Plan objectives which include reducing congestion. We would like to see priority given to reducing congestion in and around Kew Bridge which is often heavily congested and will become more so if the proposed re-development of Lionel Road, across Kew Bridge is approved by Hounslow. We note that you plan no new car parks in the Site Allocations Plan for Kew and we agree this is right in general (though see our comments below in our paragraph 6 on sites in Kew and the Kew Gardens car park re-location) . Urgent attention needs to be paid to the implications of the Lionel Road development for traffic and parking in Kew.</p> <p>3. Community Facilities: on page 29 in paragraph 2.7.6 you refer to the vision for libraries to be focal points for the community, promoting reading and supporting learning and your intention to retain libraries throughout the Borough and enhance their role. We support this policy. In paragraph 2.7.7 on page 30 and in paragraph 2.7.14 on page 31 you prioritise the Kew library for co-location with other local public services to improve location and opening hours. You do not say where this might be. Whilst in principle we support the idea of co-location with other services, the current library location is convenient for many residents as it is near shops and the rail/underground station. We assume any changed location would be subject to planning development requirements and consultation.</p> <p>4. Health: on page 35, paragraph 2.8.15, you identify Kew as a priority for new primary health care provision. In paragraph 2.8.17 you identify the former Inland Revenue site as an appropriate location for this, as part of a mix of uses. We welcome the</p>

Ref. no.	Name/Organisation	Detailed comment
		recognition of the need for this provision and the designation of this site for this purpose. We hope that the CCG accepts this approach to a revised primary care estate strategy.
149	Jan Marriot, RuT Forum for Older People	2.9.1 – 2.9.10 – most plans commendable. No mention of any need or supply in park facilities for older people's fitness equipment, why not – other Councils have this provision
7	Caroline Brock, Kew Society	5. Leisure and Play: on page 38, paragraph 2.9.11 you recognise the importance of green, open spaces in the borough. We agree but are unclear what priority is being given to the development of the Old Deer Park, including properties owned by the Crown Estate which should be retained for community use and improved within an overall vision for the Park.

Detailed comments – where respondent objecting to it:

Ref. no.	Name/Organisation	Comment
104	Charles Muriithi, Environment Agency	Edit paragraph 1.0.5 - In general, larger sites (or groups of adjoining sites) <i>are to be included</i> , where there is to be a significant change from the present use.
149	Jan Marriot, RuT Forum for Older People	1.0.9 and 1.0.10 We have to take this statement on trust
149	Jan Marriot, RuT Forum for Older People	1.0.11 "some of the issues identified" – please specify "5 year supply of deliverable sites" – do be sure this is addressed we would need to know a) how many houses are needed? b) what % has to be affordable housing? c) Are these sites allocated able to address the critical need for affordable housing? We need clear and precise details here. "contribute to meeting the 5 year plan supply of deliverable housing sites" - what are the stats of need? Because this sentence implies the plans are only making a contribution and NOT meeting the need which is not acceptable in the face of the critical housing need. Unless we have these figures we will not have a true picture of SUPPLY meeting the NEED.
149	Jan Marriot, RuT Forum for Older People	1.0.12 – the Mayor has recently "upped" the affordable housing re 80% of current market price, which may well take affordable housing beyond what residents could possibly afford, so this will have a grave impact on what can be classed as affordable and should reflect on pricing local younger generation residents beyond the ability to live within the Borough and especially those who work in the Borough. How will this plan be adjusted to cope with this? For this will affect on how we can keep a balance of generations within our Borough and the know on effect of families loss if they have to move away because of impossible costs. The Council must think of the knock on effect of younger generation caring for their older relatives and of the grandparents caring for their grandchildren because both younger parents have to work to meet the soaring housing/rental costs.
149	Jan Marriot, RuT Forum for Older People	1.0.14 "addressing some of the issues" – why only some? "transport planning" and "strategic function" failed very badly at Richmond Station.
149	Jan Marriot, RuT Forum for Older People	2.1.2 – bullet point three – what does this mean in reality? It reads as just an escape clause! Because if sites are to be considered in the light of general development policies they are not than subject to this SA requirements and regulations.
118	Cllr Martin Elengorn, RuT LD Councillors' Group	Housing In paras 2.1.3 and 2.2.15 make clear a high proportion of affordable housing is required, particularly on larger sites. In each of the proposals for Council-owned sites (including TD2, TW9, TW13 and WT1) including the words "residential, including

Ref. no.	Name/Organisation	Comment
		<p>affordable” amend this to “residential, 100% of which shall be affordable” and in each of the other relevant individual site proposals (including HA1, HA4, TD1, TD4, TW10, TW14, WT2, WT3, BA2, EM1, EM4, EM5, HP1, KW1, KW3, RI2, RI3 and RI5) amend the words “residential, including affordable” to “residential, a high proportion of which shall be affordable”</p> <p>Transport In paras 2.5.9 and 2.5.12 add Teddington Station and make provision of lifts at Teddington Station a new site proposal TD7. Lifts are particularly needed because Teddington is an interchange station and has no step-free way of getting from platform to platform except by a lengthy road route.</p> <p>Community facilities In para 2.7.9 add reference to need for capital investment in community centres</p> <p>Design Add as new para 2.10.1 All developments on sites identified within this document should aim for excellence of design and to ensure that in the 21st century potential listed buildings are provided in the borough to match the standard of the listed buildings of previous centuries. The requirements of the National Planning Policy Framework on design will be followed and, in particular, While seeking to promote and reinforce local distinctiveness, great weight will be given to outstanding or innovative designs and the Council will not attempt to impose particular architectural styles or tastes. New developments should be integrated into the natural, built and historic environment. The Council will restore its design review panel and have regard to its recommendations The references in HA1 to “traditional” and in WT2 to “1930s style” may therefore be unnecessarily prescriptive and should be reconsidered.</p>
175	Cllr Liz Jaeger	As regards any residential that isn't affordable housing, a Whitton resident has asked that some private housing suitable for the elderly is considered. She, and she thinks there are many like her in Whitton, wants to downsize within Whitton, but she says there is a lack of suitable flats.
149	Jan Marriot, RuT Forum for Older People	2.2.2. – This paragraph is loaded with details and needs to be clearly defined by what the Council have in facts and figures to the specific needs. Why cant we have the details of the objectively assessed needs a) affordable housing b)single bedsits c)nursing home for the elderly – not just the special housing for the elderly d) special needs/mentally ill/handicapped/those incapable of independent living. We could then see if priority has been given to the greatest need. We could then assess the plans better to avoid ghetto type areas in the borough of sited all low grade housing in one particular site or area within the borough.
149	Jan Marriot, RuT Forum for Older People	2.2.3 – growth re forecast is of concern, we need figures to see the reality of this growth. What are these “Housing Supplementary Planning Guidance” How much time do the Council think lay people have to look up all these papers? Surely main details could be summarised here on the necessary factors that will or have influenced this draft.
149	Jan Marriot, RuT Forum for Older People	2.2.9 Student needs – this isn't true for St Mary's area and the American Uni. First years are usually lodged on campus but out in the rented community thereafter. Should the Council encourage Uni's and colleges to provide more rented accommodation.
149	Jan Marriot, RuT Forum for Older People	Mortlake High Street – any narrowing of roads always exacerbates congestion. Buses and bus stop sites always create more problems than they solve. Richmond Station is a prime example, it has caused traffic problems for older people and mothers with childrens buggies, it is a nightmare. Multiple bus routes at one stop is a MAJOR problem and needs to be thrashed out with TfL. Twickenham bus stop changes will cause so many problems for residents who need to change onto bus route 267 for West Middlesex hospital. Crossing at those traffic lights causes much frustration and anxiety and take so much longer to get from one part to another. Vehicles seem to take precedence over pedestrians.

Ref. no.	Name/Organisation	Comment
123	Francis McInerney	<p>2.4.13, 2.5.6, 2.6.14, 2.6.16</p> <p>Lack of longer-term vision in projection of demand for secondary school places (and possibly other areas of Eductaion and Transport, etc.)</p> <p>2.4.13 says that speculative office development in Richmond borough is viable, but it must be acknowledged that a large amount of office space is empty especially in Twickenham</p> <p>In 2.5.6 the document recognises the high levels of traffic and significant road congestion particularly in the morning and evening peaks. The borough policy (2.5.11) is to discourage commuter parking and not introduce new car parks within the Site Allocations Plan (2.5.11).</p> <p>2.6.14 The educational need is based on a 'working assumption' to support the need for a new [secondary] school in the borough within the Site Allocations Plan period. Demand for secondary school places must be based on factual evidence. The factors influencing demand for secondary school places are well known and the main driver is quantifiable in relation to pupil numbers feeding through from Junior schools.</p> <p>The Site Allocations Plan period is 15 years but the Council stated last January that the need was for a new secondary school on the college site to open as early as 2017. This was confirmed in Council press release on 6 November.</p> <p>2.6.16 The number of students enrolled at Richmond upon Thames College in Egerton Road is approximately 3,000, not 4,000 as stated. (Sources: RUT College website and the college's promotional material.)</p> <p>The Education elements in the Site Allocations Plan appear to be addressing the short/medium term rather than the 15-year period of the SAP. A secondary free school aims to open next year, subject to a site becoming available but there seems to be no provision for demand in secondary places beyond 2017.</p> <p>(The same comment may prove to be true of other areas such as Transport and Housing.)</p>
149	Jan Marriot, RuT Forum for Older People	<p>2.7.4</p> <p>DM SI 2 – Why provide elasewhere when adequate provision is in situ? As with proposals for Richond library – why relocation when they both already serve their purpose.</p>
149	Jan Marriot, RuT Forum for Older People	<p>2.7.8</p> <p>Voluntary involvement should not absolve the Borough Council from it's obligation to keep our libraries functioning</p>
149	Jan Marriot, RuT Forum for Older People	<p>2.8.3</p> <p>"The loss of Community...unless it can be shown...no longer needed... or re-provided in a different way or elsewhere"</p> <p>This statement is very worrying for the following reasons:</p> <p>So long as it would be in accordance with those who provided services, e.g. Greenwood Centre, Linden Hall and Ellery Hall for instance. Their voice MUST BE LISTENED TO. These services must not be contracted out to private financial enterprises. They must remain the responsiibty of the Council.</p> <p>Contractors will make decisions primarily for their organisation and not for the welfare othe those they serve as has happened in the Contract out for Carer's Travel costs fiasco – a primae example of what happens when the Council shed their responsibility. Who suffers – not the Council, not the Company BUT those who are on the receiving end of caring services. This seems another example of an escape clause.</p>

Ref. no.	Name/Organisation	Comment
149	Jan Marriot, RuT Forum for Older People	2.8.4 Borough Integrated Care – the CCG have failed to implement this – so what is Plan B for Integrated Care? HRCH have been the only successful organisations making this work
133	Dale Greetham, Sport England	Chapter 2 Meeting Needs – 2.9 Leisure and Play Sport England welcomes the Council's recognition of the need for indoor and outdoor sports facilities, however: OBJECTION – Local Plan & Evidence Base The National Planning Policy Framework (NPPF) requires each local planning authority to produce a Local Plan for its area. Local Plans should address the spatial implications of economic, social and environmental change. Local Plans should be based on an adequate, up-to-date and relevant evidence base. In addition, paragraph 73 of the NPPF requires that: <i>“Planning policies should be based on robust and up-to-date assessments of the needs for open space, sports and recreation facilities and opportunities for new provision. The assessment should identify specific needs and quantitative deficits or surpluses of open space, sports and recreational facilities in the local area.”</i> Paragraph 175 of the NPPF states: <i>“Where practical, Community Infrastructure Levy charges should be worked up and tested alongside the Local Plan.”</i> Sport England advocates that new developments should contribute to the sporting and recreational needs of the locality made necessary by their development. Sport England is not aware of a robust evidence base for playing pitches and indoor sports facilities for Richmond. It is not clear how this lack of evidence base has been/will be taken into account to develop this document. Sport England would be happy to provide further advice on how local authorities can strategically plan for sports facilities. There are a number of tools and guidance documents available, which can be found on Sport England’s website at: http://www.sportengland.org/facilities-planning/planning-for-sport/forward-planning/ . In addition Sport England has a web based toolkit which aims to assist local authorities in delivering tailor-made approaches to strategic planning for sport. This can be found on Sport England’s website at: http://www.sportengland.org/facilities-planning/planning-for-sport/previous-guidance/ . The toolkit focuses on built facilities for sport and recreation, setting out how planners can make the best use of sport-specific planning tools in determining local facility needs.

Detailed comments – where respondent gave no indication if supporting or objecting:

149	Jan Marriot, RuT Forum for Older People	1.0.1 – First para – how does this differ? Assume this is explained later. Would have been helpful to have the main differences detailed here Bullet points 1 and 2 – what are these policies?
149	Jan Marriot, RuT Forum for Older People	1.0.2 – What influence will the result of consultation have? As Twickenham plans have met opposition from the public but plans have gone ahead despite public opinion, one would expect the public’s voice would carry some changes to the proposals as a result of the consultation or the consultation is a pointless exercise
149	Jan Marriot, RuT Forum for Older People	1.0.3 – Needs details of the Act and Regulations
149	Jan Marriot, RuT Forum for Older People	1.0.4 – What are these other proposals

	People	
149	Jan Marriot, RuT Forum for Older People	1.0.5 – Will the Borough’s Local Implementation Plan be open to consultation? The need for clarity here please – Re “Designations may be proposed to be changes if appropriate” will this be after consultation, if so will the proposed changes be open to consultation?
149	Jan Marriot, RuT Forum for Older People	1.0.6 Do you name compulsory sites?
149	Jan Marriot, RuT Forum for Older People	1.0.16 “working in partnership with the local community” does this mean residents will be listened to and changes to proposed plan if they object?
149	Jan Marriot, RuT Forum for Older People	1.0.16 cont - what are these other plans?
149	Jan Marriot, RuT Forum for Older People	1.0.19 “Habitat Regulations apply” what are these – details needed please
149	Jan Marriot, RuT Forum for Older People	1.0.20 – are there penalties for delay? Are there any provisions for extenuating circumstances?
149	Jan Marriot, RuT Forum for Older People	1.0.21 – will this report be accessible to the public and how will they access it if it is?
149	Jan Marriot, RuT Forum for Older People	1.0.22 – will equal opportunity for access and informing the public via the media/press
149	Jan Marriot, RuT Forum for Older People	1.0.16 “working in partnership with the local community” does this mean residents will be listened to and changes to proposed plan if they object?
149	Jan Marriot, RuT Forum for Older People	1.0.16 cont - what are these other plans?
149	Jan Marriot, RuT Forum for Older People	1.0.19 “Habitat Regulations apply” what are these – details needed please
149	Jan Marriot, RuT Forum for Older People	1.0.20 – are there penalties for delay? Are there any provisions for extenuating circumstances?
149	Jan Marriot, RuT Forum for Older People	1.0.21 – will this report be accessible to the public and how will they access it if it is?
149	Jan Marriot, RuT	1.0.22 – will equal opportunity for access and informing the public via the media/press

	Forum for Older People	
149	Jan Marriot, RuT Forum for Older People	2.2.1 - it is to be hoped that Older People's Care Homes and Single Bedsits for younger working residents who cannot afford homes
149	Jan Marriot, RuT Forum for Older People	2.2.4 – what are CP14 target figures please? Please define specific needs for all sections.
149	Jan Marriot, RuT Forum for Older People	2.2.5 – 40%, 10% and 50% of what? If we don't have the figures how can we know if these percentages are accurate planning
149	Jan Marriot, RuT Forum for Older People	2.2.5 "Supplementary planning guidance" These should be specified here
149	Jan Marriot, RuT Forum for Older People	2.3.12 – Richmond Station – please confirm that this will be inside the station. If retail space has delivery to retailers been addressed.
149	Jan Marriot, RuT Forum for Older People	2.4.2 – Business agreed is to be encouraged but utilising existing business premises should be the priority. So many office and small industrial sites have been vacant and still are – so special consideration must be given to use these first before any further planning is approved. Most empty premises could be adapted to purpose.
149	Jan Marriot, RuT Forum for Older People	2.6.19 Education needs – when financial crisis impacts on children being withdrawn from fee paying schools, the need to integrate children into state schools becomes a problematic pressing need. In view of this planning priority must be given to provision of state schools in preference to private schools.
149	Jan Marriot, RuT Forum for Older People	2.7.14 Community centres – encourage multi-purpose plans as this will enable better hire usage and so enhance sustainability
149	Jan Marriot, RuT Forum for Older People	2.8.16 JSNA – give access details

Sites in Hampton

HA 1 Hampton Square, Hampton

Detailed comments – where respondent gave no indication if supporting or objecting:

Ref. no.	Name/Organisation	Comment
93	Suzie Rowe	General I have looked at the plans in relation to Hampton Square, can you please clarify what you plan to put where and what will happen

Ref. no.	Name/Organisation	Comment
		<p>to the area on the green, will this remain as open space with the playground.</p> <p>I have also looked at the plans across Hampton for increased housing and would like to know what extra provisions will be put in place to cover schools, doctors etc. There are already many more primary places than Secondary in the area now with the extra class added to Buckingham, the bulge class at Hampton Infants and St Mary's school.</p> <p>It is also extremely difficult to get an appointment at the doctors so with more housing are there plans for more schools and GP surgeries.</p> <p>When I moved to Hampton one of the appealing features was the amount of open green spaces and the general spaciousness of the area but this seems to be disappearing fast with houses and flats being crammed into every available space, one house being knocked down to be replaced by several houses or flats.</p> <p>It would be very sad for Hampton to loose its village feel and just to become part of concrete London</p>

HA 2 Hampton Water Treatment Works, Hampton

Detailed comments – where respondent supporting it:

Ref. no.	Name/Organisation	Comment
126	Carmelle Bell, Savills on behalf of Thames Water	<p>Site HA2 Hampton Water Treatment Works</p> <p>Thames Water support the continued identification of Hampton Water Treatment Works (WTW) for operational development as it is a strategic works which will require future upgrades to continue to supply London with potable water.</p> <p>However, it is considered that the Sunnyside Reservoir and Filter Beds and buildings which form part of the WTW site should also be located within the site boundary (refer to enclosed plan).</p> <p>Thames Water also consider that the allocation proposal should recognise that parts of the site may become redundant over the Plan period and be available for redevelopment other than operational development, such as the Coal Wharf Office area.</p> <p>The justification text is very similar to the wording of Policy ENV 2 (A) of the UDP adopted in March 2005 and only permits redevelopment for essential water treatment related purposes. Thames Water consider that the justification text should be amended to allow for appropriate redevelopment for non operational use, such as the Coal Wharf, as previously allowed for in PPG2 : Green Belts. PPG2 Annex C: Future of existing Major Developed Sites. It has previously been indicated that the Coal Wharf is acceptable for redevelopment for office use and therefore this should be allowed for in the wording.</p> <p>Thames Water also consider that point 3 of the justification in relation to the light railway should be deleted, as operational requirements for water supply should take precedence to a leisure railway proposal which has been suggested for some years but not implemented.</p>

Detailed comments – where respondent gave no indication if supporting or objecting:

Ref. no.	Name/Organisation	Comment
46	Richard Parish for English Heritage	<p>HA2 Hampton Water Treatment Works</p> <p>You may wish to include a requirement that any new development within the site must sustain and where possible enhance the setting of the designated heritage assets within the site. Is there pressure to adapt or reuse the existing listed buildings? If so we would advise including a requirement that these should be retained in use as indicated in the Sustainability Appraisal</p>

HA 3 Beveree, Richmond and Hampton Football Club, Hampton

Detailed comments – where respondent supporting it:

Ref. no.	Name/Organisation	Comment
133	Dale Greetham, Sport England	HA3 Support, site policies should specifically state that the existing sports facility provision will be protected:

Detailed comments – where respondent objecting to it:

Ref. no.	Name/Organisation	Comment
63	Cllr Suzette Nicholson	Re-development of club-house and only provision of affordable housing if car-parking can be re-provided e.g. under the housing. The present car-park is not only used by the football club but also local businesses use it at other times than match times. Car-parking is very tight in the surrounding roads and there is no extra space.
139	Jen Osorio	Concern regarding the safety of children – site will be accessible to a variety of persons visiting other areas of the site. This runs counter to strict child protection policies of the Scout movement If the proposed new premises for the scouts are used by others, its use by the scouts will be much more limited than at present making the running more difficult for the many different groups within this organisation Full response to your proposal cannot be made until detailed plans are submitted so that comments about lighting, storage, environment (trees etc) can be put forward.

HA 4 Scout Hall, Station Road, Hampton

Detailed comments – where respondent objecting to it:

Ref. no.	Name/Organisation	Comment
9	Janice Merritt	Having only just seen your notice, as I was told by someone else I would like to put forward the following comments; There should be a neighbourhood consultation, not everyone in the local area walks past that ONE lamp post Housing will be totally out of character with the rest of the Parade in Station Road It will cause more parking problems to the side roads off Station Road, we already take all the cars from flats and businesses down our roads and have difficulty getting parked in our own road let alone outside where we live. With regards to point 3 I am an OAP and have several things wrong with me and even now I will not go out at night with my car as I can't get parked when I get home, and do not wish to walk about late at night. This development will make matters worse.
16	Eve Whitby	I would like to register my objection to the proposed plan to build on the property at present used by the 1st Hampton Hill Sea Scouts. The Scouting movement is a huge benefit to all communities and in this day and age we need all the facilities we can get for the younger generation to give them some standards to work too. Too many young people these days just drift and have no role models, and need guidance. I feel that the Scouting Movement is just ideal and needs all the support from it can get from all sources. Please think hard about this proposal.
17	Charles Gilby	I would like to formally object to any change of use for the Sea Scout site in Hampton. I understand the need for social housing but to replace the Scouts with housing is not in the public interest. The Scouts have immense benefits to the community and the future of the community. They impose no burden on the public purse and through self funding do not rely upon the council for anything other than to remain a good landlord. They pay their rent for the land and have built their own hut, again at no cost to the public purse. Please stop threatening to remove their site regardless that there

Ref. no.	Name/Organisation	Comment
		<p>are suggestions of an alternative site (unnamed) All they ask is to be left in this position. Destroying their current site for some promise of another location is just too destructive for any voluntary organisation to sustain. Even the fear of loss of the site is very damaging to the group. They have a very worthwhile job to do supporting and encouraging young people and this issue is just taking efforts from this role.</p>
19	Timothy Gilby	<p>I am writing this letter whilst holding a number of potentially conflicting viewpoints regarding these proposals. Professionally I work as a director of a national land development company being both a Chartered Surveyor and Chartered Builder and therefore appreciate the issues that arise I support Government policy to increase housing supply nationally I accept the social need for affordable housing and Local Authority's responsibility in seeking to supply this as part of their Planning Policy I recognise that the Local Authority are freeholders of this site and that 1st Hampton Hill Sea Scout Group occupy the site on a leasehold basis in a building built entirely from their own fundraising activities I have been a member of the Scout Association for forty years I am a qualified canoe and kayak coach of the British Canoe Union with 28 years experience I have offered my canoe and kayak coaching services to the 1st Hampton Hill Sea Scout Group on a voluntary basis for approximately 20 years Given this background I have studied the Site Allocation Proposals with regard to the Local Authority's Planning Policy (Local Development Framework Core Strategy April 2009) and relevant documents referenced in it such as the Community Plan 2013-2018. I have set out where these proposals could give rise to a valid objection to a planning application based on material grounds on a separate sheet (attached.) These items are relevant in support of some of the points made below. By the terms of their Planning Policy, Local Authority is pursuing a legitimate aim to make provision for affordable housing on this site. Likewise however the operation of 1st Hampton Hill Scout Group is also meeting a number of stated objectives in accordance with Planning Policy. The crux of the issue therefore is whether the greater public good would be best served by EITHER This site providing affordable housing to a few families/key workers, despite its less than ideal development potential OR Remain in its continued use as : A Centre of Excellence (as recognised by the Royal Navy and inspected by them for its standards of training and separately having a dedicated disabled section enabling inclusive activities with the able bodied, including boating. The Group also has members in Care.) AND Operated by a viable voluntary community based youth organisation established in the community for decades which involves up to 100 families from the locality at any given time and at no cost to the public purse. AND Making a significant contribution to society by meeting the objectives of Planning Policy as set out in the Core Strategy and Community Plan. It does this by developing young people as individuals through a progressive training scheme to become responsible citizens and members of their local, national and international communities. The Scout Association is accessible to all</p>

Ref. no.	Name/Organisation	Comment
		<p>without inequality. It is relevant to note that: The Scout Group has not to date received any formal notification of this consultation That the Consultation states that "receipts from this should allow for the scout hall to be re-provided in the vicinity." This fails to recognise that receipts would not be forthcoming unless the Scout Group had vacated the site. Without the receipts there would be no capital available to provide another facility in the vicinity. This is effectively a Catch 22 situation. Consequently this is a flawed policy by not having an appropriate mechanism in place to address this issue. The resultant lack of a meeting place would effectively close the Scout Group. In any case, a significant threat to a voluntary organisation in a situation such as this is the potential destabilising nature brought about by the general uncertainty, as their energies are diverted from their core activities which could have the same damaging effect overall. There is limited development density potential for the site in question and it is not ideally suited to residential development. Consequently if the Scout Group were to be allocated a facility on an equivalent area of land in the immediate vicinity (HA3 Beveree as stated in the consultation), there will be no net positive effect to the village of Hampton as a result of the relocation, other than it will have cost a significant sum to achieve. It would be more efficient to incorporate the affordable housing requirement into HA3 and leave HA4 as it is. Having given these matters due consideration and for the reasons given, I oppose the proposals set out in this Consultation. I am writing this letter to supplement my previous letter dated 03 November 2013, although I still maintain my objection to these proposals as stated. However if the Council is still minded to pursue the allocation despite these objections, the justification should be amended to read: <i>"The site to be redeveloped for residential use, including affordable housing, and shall not be implemented until the scout hall has been re-provided in the vicinity, preferably as part of the reconfiguration of site HA3 (Beveree, Station Rd, Hampton.)"</i></p>
29	Jill Fielder	<p>As District Chairman of Richmond-upon- Thames scouts, I would like to register my objection to the proposed plans to demolish 1st Hampton Hill Scout HQ in Station Road Hampton. This is a thriving group with over 100 young people taking part in scouting skills each week, while also being able to learn seamanship skills from experienced adult leaders. It is our only Royal Navy recognized group on this side of the borough, and to achieve this recognition has only come about because of the many hours of work by the groups volunteer leadership team. To lose this scout group would be a great loss to the local community. I urge you to rethink this planning application.</p>
35	Ian Anderson	<p>I am a former assistant Cub Scout Leader with 1st Hampton Hill Sea Scout Group I object to them knocking down the HQ as a lot of people spent time and effort in to raising funds and building it and its purpose built and access can be got at all times where as a joint or shared facility they wont have the freedom a Scout group required. Paragraph(3.1.4) applies</p>
38	Elizabeth George	<p>I would like to object very strongly to the council's proposals to demolish the scout hut in Station Road, Hampton. My main objections are the amount of traffic that would be generated in an already very busy road. Also, in a lovely green area such as Hampton we should be protecting our green spaces (referring the trees and bushes around the actual site) not cutting them down in favour of new red brick houses or flats.</p>
39	Rupert Gale	<p>I am writing in response to the council's proposed redevelopment of the Hampton scout hut in Station Road, Hampton. My son has enjoyed many months superb activities as a cub on this site as has many local children of varying disabilities. I oppose this redevelopment very strongly and would like the council to look again for a more considerate site for their low cost housing development. Surely the water works and sites on the Thames would offer more agreeable locations for your low cost housing</p>

Ref. no.	Name/Organisation	Comment
		developments. Please look again at this proposal... its for the children after all.
43	Angela Cavill	I have recently been informed of your decision to move the above Scout group. I am the District Commissioner for Whitton Guiding Association and would like to oppose your proposals. Guides Brownies and Rainbows work together and need the Sea Scouts in their premises to help support and keep our Girls safe in the river. Please reconsider, many thanks,
44	Dominique Jabbour	I read with dismay the article posted on page 5 of the Friday 1 November edition of the Richmond & Twickenham Times. The proposal to redevelop this site in favour of new housing is shocking and does a great disservice to our local community. It would be a dreadful shame to lose this longstanding local facility to yet another housing development. The Scout Hut has served the community so well for so many years and does not deserve such an ignominious fate and the community in Hampton will suffer for it. Personally-speaking, I have many great memories of the Scout Hut from my days at 2nd Hampton Guides when we used the Hut for cook outs and various other outdoor Girl Guiding activities. It's always been a great local resource and through the years has helped to build community in our local area.
45	Mary Ironmonger	I understand the London Borough of Richmond upon Thames has decided to redevelop the property used for many years by the 1st Hampton Hill Sea Scouts. This organisation plays a very important role in many young people's lives and I would like to know what guarantee the Council will be giving to the Sea Scouts with regards to alternative suitable local accommodation in order that no disruption is caused to this much valid movement.
155	Prof. Glenn Robert	I am the father of two young boys who are members of the Scout Group. The scout group operates from a building paid for by their own fundraising on a plot of land in Station Road, Hampton. In addition to normal scout training they provide boating activities and seamanship training to a high enough standard for them to be one of only 100 such groups nationally to be formally recognised and regularly inspected by the Royal Navy. They also have a dedicated section providing for the disabled who partake in all the activities in an inclusive manner. They also have members who are young people in Care. The group involves up to 100 families from the locality at any given time. The group meets the Aims of the Scout Association by developing young people as individuals through a progressive training scheme to become responsible citizens and members of their local, national and international communities. The Scout Association is accessible to all without inequality. The land they operate from is owned by the Council to whom rent is paid. The Planning Consultation would re-allocate the land occupied by the scout group to residential use for affordable housing. I am writing to raise an objection to this specific proposal in the Consultation. The Planning Consultation does not give any details of how the scout group might be re-located to a nearby site. The site is comparatively small, has in the past been limited to single storey development, has a number of mature trees and is located adjacent to a public house. These constraints mean that it has very limited development potential – it could not provide housing for many people. A significant threat to a voluntary organisation in a situation such as this is the potential destabilising nature brought about by the general uncertainty, as their energies are diverted from their core activities which could have the same damaging effect overall. In conclusion, the Council are acting in accordance with National and Local Planning Policy in an effort to provide affordable housing. The operation of the scout group however meets a significant number of Planning Policy aims that relate to community cohesion, provision for the disabled, services for young people, the voluntary sector, sport and recreation, health and wellbeing etc. The crux of the issue is therefore whether the greater public benefit will be served by this site being used for the provision of very few affordable homes or the continued undisrupted operation of 1st Hampton Hill Sea Scout Group. The activities and contribution that Scouting makes within the community is a good fit with the LBRUT Local Development Framework Core Strategy Document (a planning policy statement) i.e. it fits with Local Planning Policy which is therefore a valid reason for objection to the

Ref. no.	Name/Organisation	Comment
		proposals.
164	Mr Paul Lonsdale	I wish to object to any planned redevelopment of the 1st Hampton Hill Sea Scout Headquarters. This Group is one of only two Sea Scout Groups in the entire borough, and one of only 102 Sea Scout Groups in the whole of the UK to have Admiralty Recognition. There is great demand for Scouting in the borough and most particularly in Hampton & Hampton Hill. All Groups are heavily over subscribed and are operating waiting lists. The voluntary sector is very important for youth provision in the Borough. Sharing facilities with the football club would be highly unsatisfactory. Scouting requires adults to have enhanced CRB for reasons of Child protection. It is unlikely that users of the football club premises would meet this requirement. In addition it is likely that the times of use required by Scouting and the football club would clash, probably to the detriment of the Scout Group.. I would also wish to question the lack of notice and consultation afforded to the Scout Group. Surely a better means of notification could have been found than a small notice on an adjacent lamp post?
165	Lucy Soleri	HA4, Scout Hall, Station Road, Hampton I am in favour of 1st Hampton Hill Sea Scouts remaining on this site. I therefore object to the proposals in this Consultation. Yours sincerely Signed Lucy Soleri Date 11-11-13 Address : 49 briar Close Hampton TW12 3YZ Policy and Design LB Richmond upon Thames Civic Centre 44 York Street Twickenham TW1 3BZ Dear Sir/Madam Re London Borough of Richmond upon Thames, Local Plan Consultation on Pre-Publication Site Allocations Plan from 1 October 2013 until 12 November 2013 - Site Allocation HA4, Scout Hall, Station Road, Hampton I am in favour of 1st Hampton Hill Sea Scouts remaining on this site. I therefore object to the proposals in this Consultation. Yours sincerely Signed Lucy Soleri Date 11-11-13 Address : 49 briar Close Hampton TW12 3YZ
91	Victoria Phillips	HA 4 I completely disagree with this proposal. This site has been used for youth activities in Hampton for many years and it is not appropriate to try to rehouse the activities in an adult football club with shared facilities. There has been no consultation at all with the sea scouts. There is a huge increase in children and young people in the area and facilities for them are badly needed.
161	Dr Gavin Kelly	HA4 This involves the removal of a very valued resource to the local community. Our two children both went to Sea Scouts here - they've left now. It is hard to find reference to what provision will be made for this group, which has had a marked contribution to our borough, helping young people to become well-adjusted members of society. But the information I've heard indicates that it is totally inadequate. This is an odd-shaped plot, and doesn't strike one as particularly suited to residential development to the degree that would compensate for the removal of the wonderful facility currently provided.
47	Jo Liddell	I was disappointed to learn that you are proposing knocking down the The Scout Hut at 84 Station Rd, Hampton, Middlesex, TW12 2BX in favour of creating more housing. My son will be joining this scout group as soon as he is old enough and I was very concerned when I learned from another parent that you are planning to demolish their base. The Scout group offers children like my son the opportunity to mix with other children in a fun, safe, local environment while learning about important skills like water safety as well as they usual scouting skills. I also understand that the proposal is to relocate the Scout HQ to the football club which unfortunately has not even been formally discussed with the Scouting Group. This feels like a very inappropriate place to relocate them to bearing in mind these are young children and the group must adhere to strict child protection policies. They would also have to share facilities, often needing to use them at the same time as the football club.
48	A. Hunt	Re the section concerning the possibility of demolishing the scout hut in Station Road Hampton and replacing it with housing : if this does ever happen : please ensure that there is adequate parking provided. As is well known, parking in Station Road and side roads off it is a nightmare and not getting any better. The construction of houses or flats without adequate parking spaces (which has happened several times - eg the flats right next to the station) is not

Ref. no.	Name/Organisation	Comment
		acceptable.
49	S. Shailer	I am in favour of 1st Hampton Hill Sea Scouts remaining on this site. I therefore object to the proposals in this Consultation.
50	A. Davies	<p>I am writing to you as the Scout Leader at 1st Hampton Hill Sea Scout Group. I was both surprised and disturbed to find a planning notice outside our Scout Headquarters the other day which describes a scheme to knock down our Head Quarters and replace it with housing (HA4).</p> <p>Surprised because we have not been contacted regarding this before it was made public so had no chance to prepare our young people for the news that “they are going to knock our scout hut down” and distressed because I have personally put over 20 years of my life in to building up the group after its near collapse</p> <p>Whilst I appreciate that housing is necessary, I firmly believe that to evict a thriving community group (which will probably spell its death knell to build a few flats is not the responsible way to go.</p> <p>I therefore object to the plans in HA4 due to the Loss of amenity in that Hampton will be losing a valuable and thriving facility for the training, education and entertainment for the youth of the immediate area and in part further afield (Scout District activities that we are involved with) and especially that we undertake a number of unique specialist activities in the area i.e.</p> <ol style="list-style-type: none"> i. We are the only SEA SCOUT group within the Hamptons area. ii. We are RECOGNISED BY THE ROYAL NAVY as of being a high quality Sea Scout group. iii. We have an active section for disabled Scouts and Explorers (the only one in the district) iv. We are the only Scout group in the area that has a D of E section that concentrates on the nautical skills. v. There is No spare capacity in other local groups as they are full. <p>There has been mention of “there may be a possibility of moving the Scouts in the foot ball club, This would be very A) inappropriate (due to our very strict child protection policies) and B) unworkable (as we would mostly need any shared facilities at the same time as the football club</p> <p>I therefore ask that this proposal be rejected.</p>
51	E. Davies	<p>A week or so ago I saw that a notice had gone up outside our scout hut which is on Station Road, Hampton.</p> <p>After reading it I was deeply concerned about its subject.</p> <p>It stated that the site was 'earmarked' for affordably housing. Whilst I agree that more affordable housing is need, I also think that the community also needs a scout hut.</p> <p>I have been onto the website and viewed the document that contains the proposals, and have seen that a provision would be made for the scout hut to be relocated to site HA3, which is the football ground, and for some shared facility's.</p> <p>I have given it thought and i feel moving us in with the football ground is not the correct way forward. This is due to a few simple factors.</p> <ol style="list-style-type: none"> 1. The shared facility's would be needed at the same time. On Wednesdays we have a regular explorer scout meeting and the football club have training, and on Saturdays we have boating sections which we would need the changing facility's while the football club have matches on Saturdays. 2. For the purpose of scouting, wherever and whenever adults come into contact young people, all adults need to be DBS checked (used to be CRB) 3. The implication of re-developing the site would increase the amount of traffic along station road. Currently there is only two nights and one day a week which there is traffic caused by our meetings, which is minimal and outside of peak hours. The effect of a residential site would greatly increase traffic and especially during peak hours. <p>So in conclusion, and speaking as one of the few leaders that has come right through from a beaver scout to a full leader within the group and now with 5 years service as a leader, I feel that the way forward is not to move us into the football ground, but to</p>

Ref. no.	Name/Organisation	Comment
		put the affordable housing into the re-development of site HA3.
52	Deborah Hawkins	My comments relate to your proposal to demolish the Sea scout Headquarters in Hampton. This building has been on this site and in use few many generations of sea scouts - including my own husband and his father. It is an outrage that such a valued institution is been proposed to be demolished for money hungry developers to build yet more unaffordable luxury apartments. I will be writing to my MP to also express shock and outrage at this proposal.
54	Jeff Smith	I am deeply concerned by the proposal to develop housing on the site of 1st Hampton Hill Sea Scout Group's Headquarters. We are a group which has existed since 1925 providing Scouting and Boating activities to both girls and boys from 6yrs to 18yrs old. We currently have over 60 boys and girls from all backgrounds involved in scouting. I have personally seen the group as a major factor in the positive development of so many of our local young people. To lose our Scout Hut, without either an immediate replacement or improved facility could ultimately retract on what we can offer and could put these young people off what is a great institution within Hampton Hill. Aside from the obvious social, physical and mental benefits provided by our group at our current location, there are other more local reasons why development of housing on the site should be objected to: 1) The building of new housing units will undoubtedly have to be a larger and taller building than the current one. This would result in less light reaching the neighbours houses and gardens. 2) The new proposed housing units would end up overlooking areas which are not currently overlooked, and this would end up in loss of privacy. 3) Parking on Station Rd is already at premium, with restrictions already in place. The proposed housing will cause more parking issues, and could also make more difficult for local business to load/unload their produce. 4) As an addition to point 3 above, there would be a definite increase in traffic in the area as new residents move in with their vehicles. 5) We have several healthy and mature trees currently on site at Station Rd. These would have to be cut down if the proposed housing is built on the site. This would surely be at odds with the Council's Green policies as it would increase global warming. 6) We have been informed that the area in Hampton Hill is a conservation area. This was the information supplied a family living less than fifty metres away who recently applied for a loft conversion. If they have been denied planning permission, then I can't see how the proposed building of several housing units could be granted permission.
55	M. Wood	1st why make is so hard to respond. What do you have to hide. The council does very little to help us run scouting & guiding. If the council had to run & pay for all that scouting & guiding provide it wouldn't happen. To move a very successful scout group is madness. Leave the scouts alone & give us more support.
56	Stephen Pope	I understand that there is a proposal to redevelop the First Hampton Hill Sea Scout Hut for residential accommodation some of which may include affordable housing. Whilst I am not a local resident I have made use of the facilities offered by First Hampton Hill Sea Scouts in my capacity as Assistant County Commissioner Activities for Scouts in Leicestershire and would like to be able to do so again. The group is very successful and offers a benefit both to the local area by providing a successful voluntary youth organisation which gives young people development opportunities second to none as well as helping them with direction but also provides a wider benefit for other young people across the Country. As a mark of its excellence I believe the group is one of the few officially recognised by the Royal Navy. The scouting organisation in general is recognised worldwide as providing positive benefits to young people enabling them to become productive members of society. Whilst I also recognise there is a need for the local authority to provide extra housing and in particular affordable housing I would ask whether this particular development should go ahead. I understand that the council are looking to provide alternative facilities to the Scouts. However for the group to move successfully these facilities would need to be available for them to move into straightaway. Any hiatus and loss of the headquarters would cause in my experience significant difficulties to the group which could threaten its continuance. If the council are to provide alternative facilities would it not be better to develop that site for

Ref. no.	Name/Organisation	Comment
		<p>residential accommodation. This would obviously save the costs of demolishing the existing Scout hut as well as moving and altering customising the alternative facilities which will be made available. For the above reasons I oppose the proposals set out in the Consultation.</p>
58	Aiden Farelly	<p>1st Hampton Hill Sea Scouts were formed in 1925 and have been part of the fabric of Hampton life for more than 80 years. The group has been based at its current location since 1976. The group caters for children of all ages and abilities from 6 years old up to 18 years old for both boys and girls living in the southwest region of Richmond of Thames covering Hampton, Hampton Hill, Fullwell, Teddington and Twickenham. The group is particularly well known for its inclusion of disabled children who partake in all group activities along with their able bodied on an equal standing. On a regular basis, the group caters for nearly 100 families from the locality every week. The group also caters for and has members who are 'statemented' as young people in Care. The scout group operates from a building paid for by their own fundraising on a plot of land in Station Road, Hampton that is owned by the Council to whom rent is paid.</p> <p>In addition to the normal scout training 1st Hampton Hill (which is given on a voluntary basis by the group's leaders) provide boating activities and seamanship training to its members to a national standard that is formally recognised by the Royal Navy who regularly inspect the group to ensure standards are maintained. Currently, 1st Hampton Hill is one of only 100 groups nationally recognised as holding this honour.</p> <p>The group adheres to the Aims of the Scout Association by developing young people as individuals through a progressive training scheme to enable them to become responsible and active citizens and members of their local, national and international communities. The Scout Association is an organisation that is accessible to all regardless of race, religion or nationality.</p> <p>My wife and I object to the proposal for the following reasons:</p> <p>The statement recorded in the Justification Section of the proposal is a statement of intent of what is proposed for the site. The word Justification is a noun and is defined as an action to show that something is right or reasonable. The statement used by the council as Justification for the proposal does not meet this criteria as it just elaborates on what is proposed and therefore cannot be construed as a justification for changing what the land is used for. It is also not for the council to judge what is right and reasonable, this judgement should come from the local residents who are affected by this proposal who pay their council taxes.</p> <p>The site 1st Hampton currently occupies is comparatively small and has in the past been limited to single storey development due to the fact that the current structure is considered to be part of the Council Designated Conservation Area where residential development is frowned upon. The site also contains a number of mature trees and is located adjacent to a public house. These constraints would mean that it would have a very limited development potential – it could not provide housing for enough people to make it financially viable.</p> <p>We believe that the operation of the scout group however meets a significant number of the Council's Planning Policy aims that relate to community cohesion, provision for the disabled, services for young people, the voluntary sector, sport and recreation and health and wellbeing. The proposed development is vague and ill-defined, considering it has not set out how many new 'residential' properties are to be built on the plot and the additional strain they will put on local resources such as the provision for schooling in the area. We contend that the land would better serve the community as a site where young people are taught and developed into citizens that contribute to society rather the building of new residential units for a few people to occupy.</p> <p>The proposed re-location of the scout hall and its amenities to the land currently occupied by Hampton and Richmond Borough is unworkable, not only for 1st Hampton Hill but also for Hampton and Richmond Borough Football Club.</p> <p>The footprint required by 1st Hampton to enable it to run as a successful Sea Scout group must not only incorporate the facilities of a normal Scout group but also the facilities to carry out Sea Scouting activities such as rowing, canoeing and sailing and be able to store and repair its boating equipment in a safe and secure environment. The group also requires space to store its</p>

Ref. no.	Name/Organisation	Comment
		<p>safety equipment such as Lifejackets and Buoyancy aids and other equipment required by law when doing such activities. There is also the issue of Child Protection, given that the group holds it's meetings and carries out it's activities on the same days and nights the football club plays it's games and trains. doesn't the council realise that anyone attending a football match at the same time the group's meetings would have to be CRB checked by the Scout Association prior to being allowed entry to football ground to enable both organisations to meet legal requirements. If so we would suggest that both groups would be seeking compensation from the council for the costs of getting these checks completed. Both organisations need to be able to attract new members in order to thrive, not just put unnecessary hurdles in the way of growing both organisations.</p> <p>Hampton and Richmond Borough FC is the only Senior club in the borough and competes at Step 3 on the Football League Pyramid in the Isthmian Football League's Premier division. To play at this level, the football club must have the ground graded by the Football Association every year. The grading criteria covers areas such as playing surface and surrounds, spectator facilities for home and away fans to include covered stands and seating, changing room facilities for home and away clubs and match officials, hospitality for visiting officials from the league and it's clubs, the Football Association and County Associations guests and the media. The club must also provide car parking facilities for all visiting officials as part of the ground grading, no doubt the football club can provide the council's planning officer with the details of the actual grading requirements. The redevelopment proposals appear not to have taken these requirements into account. One can only surmise that the council has not thought out the impact that it's redevelopment will have on both organisations or maybe it just doesn't care. How many Council Policies has it ignored or railroaded over in putting these proposals forward?</p> <p>Local government in the borough has a history of not getting the best from the land it stewards, one only has to look at state of Hampton Pool before local residents took control of the management of the pool and made a success of it. Another example is the eyesore that is Twickenham pool and it's surroundings. In what is considered one of more affluent boroughs in England, one wonders if the council has the competence to run the borough's amenities to the standard it's residents expect and deserve.</p>
57	John Doran	Objection re the proposed moving of facilities to Hampton football club
59	Barnet Heeley	<p>Oppose the change in use of land to affordable housing because: A significant threat to a voluntary organisation in a situation such as this can be of a potential destabilising nature brought about by the general uncertainty, as their energies are diverted from their core activities which could have the same damaging effect overall.</p> <p>The operation of the scout group meets a significant number of Planning Policy aims that relate to community cohesion, provision for the disabled, services for young people, the voluntary sector, sport and recreation, health and wellbeing etc</p> <p>An important central location for a voluntary organisation</p>
60	Ed Bellamy	<p>The change that I consider necessary is to the statement from HA4 "receipts from this should allow for the scout hall to be re-provided in the vicinity", This needs to be mandated i.e. "receipts from this will allow for the scout hall to be re-provided in the vicinity".</p> <p>Similarly in HA3 it reads "together with possible re-provision of Scout facilities", which should say "together with the mandatory re-provision of Scout facilities". The Planning Consultation does not give any details of how the scout group might be re-located to a nearby site.</p> <p>Your statement gives the option to remove the Scout Hut and not relocate it . This is unacceptable as the Sea Scout hut is a key resource for the local community providing community cohesion, provision for the disabled, services for young people, opportunities for the voluntary sector, accessible sport and recreation and health / wellbeing for children and youths.</p> <p>Furthermore, the site is comparatively small, has in the past been limited to single storey development, has a number of mature trees and is located adjacent to a public house. These constraints mean that it has very limited development potential – it could</p>

Ref. no.	Name/Organisation	Comment
		<p>not provide housing for many people.</p> <p>A significant threat to a voluntary organisation in a situation such as this, is the potential destabilising nature brought about by the general uncertainty or a planning application, as their energies are diverted from their core activities which could potentially have a very damaging effect overall.</p> <p>I am also concerned that the additional housing will cause further spells of traffic gridlock in Station Road at peak times and will also result in more difficulty for drivers looking for somewhere to park.</p>
61	Rob Haines	I am in favour of 1st Hampton Hill Sea Scouts remaining on this site. I therefore object to the proposals in this Consultation.
62	Jeff Talbot	<p>The site is currently in use to provide facilities that support planning policy to: create community cohesion, provision for the disabled, services for young people, the voluntary sector, sport and recreation.</p> <p>The plan does not commit to re-providing the existing services, merely stating "... this should allow ...". It does not address the facilities required to ensure the continuation of the group which is currently providing these services which support the planning policy:</p> <ul style="list-style-type: none"> • In addition to normal scout training they provide boating activities and seamanship training to a high enough standard for them to be one of only 100 such groups nationally to be formally recognised and regularly inspected by the Royal Navy. • They also have a dedicated section providing for the disabled who partake in all the activities in an inclusive manner. They also have members who are young people in Care. • The group involves up to 100 families from the locality at any given time. • The group meets the Aims of the Scout Association by developing young people as individuals through a progressive training scheme to become responsible citizens and members of their local, national and international communities. The Scout Association is accessible to all without inequality. <p>Removal of site HA4 from the plan to allow the scout group to continue from the existing site. Or add to the plan a dedicated new site within Hampton Hill for the scout group to use, to be completed and in use by the scout group prior to them vacating site HA4.</p>
63	Cllr Suzette Nicholson	Keep the Scout Club Hall on this site. It's in keeping with the street scene, is valued by the community and serves its purpose.
64	Lynne Alexander	I was concerned to read of the proposed plans for the plot in Station Road, Hampton currently occupied by the Scout Group, They are an important part of local life and if they should lose this site there are no reassurances of an alternative. We have seen this happen in the past and would urge you to reconsider.
65	David Chick	We believe that there should no redevelopment of the site on which the Sea Scouts hall stands, until a new hall has been built in the immediate vicinity which provides facilities at least comparable to those which they presently enjoy.
66	David Walch	<p>We were very disappointed to find that plans are afoot to demolish Hampton Sea Scout Hut, (HA4 para 3.1.4 & 3.1.5) replacing it with residential property. I understand the need for the Council to review all options for commercial and residential space and maximize their usage. However what is very disappointing is that there has been no consultation, no information whatsoever coming from the council to the Scout troop. In fact it is extremely poor that the council hasn't had the courtesy to inform the Scout troop of your potential plans (whether they agree or not is a separate matter).</p> <p>Hampton Sea Scouts are an excellent organisation developing the skills of young children. We have 3 in different age groups, a beaver, a cub and a scout. I think the organisers deserve medals for giving up their time to develop our young children. Hampton is the only Sea Scouts in the area, they are approved by the Royal Navy, in the summer we take children on the river for boating practice, we have a team doing the Duke of Edinburghs Award too. This all needs to be protected not destroyed.</p> <p>The troop has lots of equipment, boats, canoes, camping gear..... sufficient to take about 50 away at any time. A huge amount of storage is required for this. Any future plans would need to allocate sufficient secure space for this.</p>

Ref. no.	Name/Organisation	Comment
		We would strongly like to stay in the current property. However if there are plans to move the troop, an equivalent alternative, including all storage, needs to be provided, and these must be discussed and agreed with the Scout Troop. I don't think this is unreasonable.
67	Karen Chuck	<p>I am writing to lodge my objection to the proposed redevelopment of the 1st Hampton Hill Sea scouts site: Scout Hall, Station Road, Hampton.</p> <p>When balancing the need for affordable housing with other considerations, I believe that this scout group provides a valuable service to the community and should be allowed to continue.</p> <p>The scout group, which involves over 100 local families, provides inclusive activities for children, including disabled youngsters and children in care. As such, this is entirely in keeping with the LBRUT Local Development Core Strategy.</p> <p>The vague statements about alternative arrangements for the scout group are ill thought through and unacceptable. With today's important emphasis on child protection, the football club would never be able to provide the level of CRB checked assurances that would be required for these youngsters.</p> <p>Therefore I strongly urge you to preserve the very important role that this group plays in the community and not force through the redevelopment of this site.</p>
68	Natalie Nesbitt	<p>I am writing to express my concern in the plans to redevelop the land which is currently used at 1st Hampton Hill's Scout Hut. As a fellow scout leader, I find it unbelievable that the council haven't even informed the scout group before putting a sign up outside the hut. 1st Hampton Hill run a sea scout group and run many water activities that other scout groups in the district are unable to. There are waiting lists in our entire borough for beavers, cubs and scouts and by relocating somewhere further away, it will not be possible to 1st Hampton Hill to run in the same way and to provide the activities they already run.</p> <p>I also believe that Hampton Football Club would be a shared facility which is generally unworkable for scout groups to have to share their space with other youth organisations, especially since they have been using their own space for many years. As you will appreciate, we have strict child protection rules and the football club also makes this difficult to manage.</p>
69	Jo O'Hagan	<p>I would like to express my concern at the proposed change of use of the site HA4 the Scout Hall in Station Road Hampton. It is all too easy to speak about potential relocation of a facility like a Scout Hall, but in practice the time and energy needed by the volunteers who run a currently vibrant and successful Group would, in all probability result in loss of leaders to continue this work. 1st Hampton Hill Scouts is not just a building but a community within itself and is open to young people of all abilities and all backgrounds working together within the framework of the highest ideals of Scouting. It is important that those in the community who give so much of their time to run Scout Groups should be supported in every way possible so that they can continue to carry out their work with young people.</p> <p>The vital training and experience of water based activities 1st Hampton Hill Scouts provides (and has provided for many years) is not just for the benefit of it's current membership but of the community as a whole. The River Thames is a potentially dangerous stretch of water which runs through the heart of our Borough and awareness of water safety and best practice should be encouraged for everyone.</p> <p>Even the threat of diverting the very limited resources of time and energy of hard pressed volunteers to have to consider a potential relocation would, I fear, have a negative impact on the Group; even if it were possible to identify a similar small plot of land in Hampton, close to the river and providing all the facilities which the current scout hall offers.</p> <p>Whilst fully appreciating the need for the provision of affordable housing within the Borough, I feel it important to weigh the needs of a thriving community project serving upwards of 100 families in the locality at any one time against the benefits of a necessarily small number of new housing units. Please reject this proposal.</p>
70	Cllr Gareth Roberts	I have very strong reservations regarding the potential loss of Site H4 from community use in favour of housing.

Ref. no.	Name/Organisation	Comment
		<p>While I appreciate the need for an increase in the stock of affordable housing it is equally important that we preserve those sites which are currently available for community use, particularly those sites which, like Site H4, exist in the heart of the community. Site H4 is currently used by our local Sea Scouts group. The sea scouts are one of our lesser known scouting organisations and I understand that they rely heavily upon a high street presence to gain awareness of their work and existence. To be shunted into a redeveloped car park would undoubtedly lead to an 'out of sight, out of mind' situation which could, ultimately, lead to the demise of the group.</p> <p>The council should be seeking to embrace the community buildings it has at its disposal, not force out long standing groups. Regarding the proposals to replace the existing building with housing, it's my opinion that housing would be inappropriate in this location</p> <p>1) It would be disruptive of the general street scene which is currently largely retail with a mix of restaurants/cafes and a pub. 2) Parking is very much at a premium in this location and additional housing would only serve to exacerbate the existing problems</p> <p>I oppose the proposition regarding Site H4 as do totality of those who have approached me as ward councillor on this matter and I believe the proposal should be withdrawn in its entirety from the site allocations plan</p>
71	Denis and Mary Chapman	I would just like register my objection to this group being evicted from their established premises. Any organisation that provides focus and a outlet for the youth of the borough can only be beneficial. I think it is essential that if the land must be developed you find a suitable home that is agreeable to the Scout group and relevant to their purpose, this should be more important than short-term financial gain.
72	Angela Barnwell	<p>As a recent recipient of a Community Award, I am absolutely appalled at the proposed take-over by the London Borough of Richmond upon Thames of the site of 1st Hampton Hill Sea Scout Group land in Station Road, Hampton.</p> <p>The hypocrisy of the Council in giving an award to people for the work they have done in the community when the Council are planning to destroy a group that affects and has affected for the good thousands of young people in the Borough over the past years is totally unbelievable.</p> <p>I will be returning my award (and the photograph of myself with Lord True) in protest at your proposed action. To me, in view of your proposed action, it is totally worthless.</p>
77	Karin Noble	I want to raise my objection to relocating the scout hut to share with a football club. This combination is highly unsuitable as Scouts need their own space for activities and storage facilities. There are only two Sea Scout Groups in the District. To have this reduced to one would be a great loss as the demand for places in Sea Scouts is high and cannot be met by one Group alone.
78	Clare Snell	<p>I am writing to you as the Group Scout Leader of 1st Hampton Hill Sea Scout Group to express my concerns about the notice that was placed on the lamp post outside our HQ several weeks ago informing us that our building was to be replaced by affordable housing.</p> <p>This came as quite a shock as earlier in the year my scout leader and I had a meeting with a representative from the council who claimed to be doing an audit of the facilities used by voluntary groups around the borough. We were assured that the sites that were well used would not have their facilities affected by any planned changes the borough sought fit to implement. We never received the report he promised to write about the outcome of this meeting.</p> <p>I would like to bring to your attention that in recent years our scout group has thrived and now offers activities to over 60 children through the scout movement, offering outstanding opportunities to these children provided by a very dedicated group of volunteers. We are also starting to provide activities for physically disabled children who have become involved with the group. As a Sea Scout Group we are the only one in the Hampton area and are recognised by the Navy as being a high quality group. We are also the only scout group in the area that has a Duke of Edinburgh section that concentrates on nautical skills. We are still providing places for children who cannot get into other groups in the vicinity as they are full. I get several enquiries every</p>

Ref. no.	Name/Organisation	Comment
		<p>week for places in the group for children in the area.</p> <p>As well as all the activities we provide as a scout group there are also several community groups that use the hall to provide activities for children such as Little Kickers football and Playball Kids Group as well as a theatre group who use the hall for rehearsals.</p> <p>Our hall is also the focal point for the annual Hampton Christmas Fair when the whole community converges there to kick off the seasonal festivities.</p> <p>All the activities and contribution that scouting makes within the community fits well with the LBRUT Local Development Framework Core Strategy Document and it would be tragic if this was to be affected by the change of use of this site.</p> <p>Your notice seems to suggest that our hall may be incorporated into the redevelopment of the site, but, looking at your diagram of the site the building seems to take up the majority of the site and it is hard to see how we can maintain an equivalent presence on the site when the houses are built.</p> <p>The building of the residential units on the site will have a major impact on the infrastructure in the area, there will inevitably be more cars parked on the roads and this will affect the businesses in the area who rely on what little there is already for their trade.</p> <p>I would urge you, Ms Fleming to investigate this matter with the utmost urgency and see if there is anything you can do to secure the future of the scout group at this site.</p> <p>With thanks in anticipation</p>
53	Tabitha Hennah	<p>It was with great disappointment that I found out via Facebook, that the Council has plans to re-develop much of Hampton where I live. Where is the consultation asking the opinion of those that live here?</p> <p>You are proposing a massive amount of housing, with no infrastructure improvements to support it. You plan to get rid of a great deal of open land, in the ten years I have lived in Hampton you have allowed and are still allowing every little scrap of land to be built on, where will it end?</p> <p>I absolutely oppose any more green space in Hampton being built on and I would hope you will be canvassing every house in Hampton to get a true feel for what the Hampton residents actually want, in the town where they live.</p>
83	Lucy Soleri	I am in favour of 1st Hampton Hill Sea Scouts remaining on this site. I therefore object to the proposals in this Consultation.
110	J. Buncher	I am in favour of 1st Hampton Hill Sea Scouts remaining on this site. I therefore object to the proposals in this Consultation.
111	P. M. Etter	I am in favour of 1st Hampton Hill Sea Scouts remaining on this site. I therefore object to the proposals in this Consultation
112	Tracey Wilkins	I am in favour of 1st Hampton Hill Sea Scouts remaining on this site. I therefore object to the proposals in this Consultation. I have two sons aged 9 and 11 who attend HHSS weekly club and camps. They love being involved in this groups and learn so much.
113	Philip Wilkins	I am in favour of 1st Hampton Hill Sea Scouts remaining on this site. I therefore object to the proposals in this Consultation. This is a long standing, highly valued community group providing great value to the community. I whole heartedly reject the proposal.
114	S. J. Bailey	I am in favour of 1st Hampton Hill Sea Scouts remaining on this site. I therefore object to the proposals in this Consultation with regards removal/re-siting of the Scout Hall/Sea Scouts Groups who attend there
115	M. Austin	I am in favour of 1st Hampton Hill Sea Scouts remaining on this site. I therefore object to the proposals in this Consultation
85	John and Sandra Preston	We fully support and are in favour that 1st Hampton Hill Sea Scouts remain on this site. We therefore object to the proposals in this consultation.
86	Karen Pickles	<p>I am in favour of 1st Hampton Hill Sea Scouts remaining on this site. I therefore object to the proposals in this Consultation.</p> <p>My daughter has been to Beavers for 2 years and is now attending Cubs at the above site, and has had much enjoyment out of the activities run there, the leaders and the friendships made, as well as becoming more independent, whilst being able to do it in the vicinity of where we live.</p>

Ref. no.	Name/Organisation	Comment
		<p>The operation of the scout group provides a brilliant community spirit, provision for the disabled, services for young people, the voluntary sector, sport and recreation, health and wellbeing and great opportunities to get in touch with boating on the river, in very capable hands. The children find this a wonderful opportunity.</p> <p>We would be very disappointed if the Sea Scouts could not continue their fantastic opportunities for the upcoming youngsters in Hampton.</p>
87	Vince Mc Caughy	<p>As a former Sea Scout who went on to join the Royal Navy I have seen first hand the importance to the country of such units in generating armed forces personnel for the future defence of the country. The current proposal to reuse the site without adequate and thought through alternative proposals is myopic and in poor judgement.</p> <p>The Scout Group is an active part of both the Hampton and Hampton Hill Community providing leisure activities for young people in the local area; giving a low cost excellent means for improving young peoples skills and self-esteem.</p> <p>Located in the heart of Hampton Village the site is both secure and prominent advertising the groups role to new parents whilst providing peace of mind for existing members parents that the children are at an enclosed secure site; something that potentially relocating them elsewhere would not give. Having lived with security checks and deep vetting checks through my career I am content that all those on the current High Street site will be CRB checked and therefore low risk; moving to alternative locations, especially if forced to share with other disparate organisations will not give this assurance.</p> <p>The Group is a fantastic advert for the local area with dedicated and committed leaders and helpers. The turnout from first Hampton Hill at the St George's Day Parade in Richmond earlier in the year was by far the largest; which is a credit to the staff given many comparable, larger units.</p> <p>I would therefore petition for the current status quo allowing 1st HH Scouts to remain in their current location.</p>
90	Elaine Davies	<p>I am writing to you in response to the planning notice relating to the site that 1st Hampton Hill Sea Scout Groups Hut currently occupies in Station Road, Hampton (HA4). I am an Assistant Scout Leader and have been involved with the Group for nearly 20 years. 1st Hampton Hill Sea Scout Group is a valued asset to the community and, on a personal level, has provided me with many happy memories and valuable life lessons during my years growing up within the group.</p> <p>I feel that if the plans to use the land our HQ currently occupies get passed this will have a negative effect on the community. The redevelopment of the site will mean that the local area loses a valuable resource. We provide Scouting and boating activities for 100 children and young people as well as providing other Scout/ youth groups within the London Borough of Richmond Upon Thames District access to our boating facilities. As all the other local groups are full (with waiting lists), if our HQ was to be demolished, it would leave lots of young people and adult volunteers without access to Scouting. The HQ is also used on a weekly basis by 'Little Kickers' (a football club for children 4-7y/o). It is also used regularly by a Dog Training group and a Theatre Group.</p> <p>The HQ has been at the centre of many community events over the years that I have been involved with the Group. I think the character of the area will be dramatically changed if houses are built on the land. Residents of the new houses will require space for parking which is already difficult in the area. They will also require access to public services such as Schools and Medical facilities which are already struggling.</p> <p>I have seen in the planning documents that provision 'might' be made for the Scouts within the redevelopment of the football ground. It mentions that the new facilities would be shared with the football club. I do not think that this would be appropriate or practical. We mainly use our HQ on Tuesday and Wednesday evenings and at weekends. The football clubs main activities are at the same time as ours. This clash of timings would mean that all adults in the football club would need to be DBS (formally CRB) checked. It would also mean that changing facilities would be used by both parties at the same time. Scout regulations require separate changing for Male and Female/ under and over 18 (four separate changing areas). Would the proposed facility be able</p>

Ref. no.	Name/Organisation	Comment
		to guarantee that these regulations are adhered to? With these points in mind, I wholeheartedly object to the plans that have been submitted. Thank you for reading my oppositions and I hope that that you and your colleagues realise how important a Scout Group and its HQ is to a local community.
100	Freda Gilby	On reading the proposal in the R/T Times on 1/11/13 about the future use of the Scout Hut of 1st Hampton Hill Sea Scouts I want to oppose it very strongly, these facilities are very much needed
101	G. Gilby	I wish to oppose as strongly as I can the proposal regarding the future use of the Scout Hut of 1 st Hampton Hill Sea Scouts. The youth organisations that exist in this Borough are vital to the future of these children, as responsible citizens. Any developments of this situations would be of interest to myself and I would like to be informed of any if possible.
109	Derek Heath	I would like to see the Sea Scouts keep there current home in Hampton on Station Road. I didn't grow up in this area but I feel that there is a shortage of groups for young people and any disruption to this marvelous local group would cause a drop in interest in the group both by supporters who have known it over the years and youngsters. The council should be putting services like this in high visibility locations in order tp encourage greater uptake of these valuable assets. There are many places in Richmond borough where the council owns property that is under-utilised or no used. How about using them. The council also has the powers to influence private developers to out some social housing into new developments. If they used these powers more effectively then sufficient social housing would be available to those who need it.
127	Mary Gray	I wish to object most strongly to the proposal reported in the local press that the building which is the headquarters of the 1 st Hampton Hill Sea Scouts Group is threatened with closure by your planning department. As a retired Akela, I can vouch for the fact that this group has contributed splendid work for the benefit of young people in the area over many years. It seems particularly callous and discourteous that the group first knew of your plans when a notice went up outside the hut.
128	Stephen Russell	I would like to oppose the closing and relocation of 1 st Hampton Hill from their existing scout hut. My son has enjoyed his beavers and cubs there and my daughter is hoping to join the evening's functions, teachings and all the other things the cubs do. Sharing with the football club would not be easy as it can only be one group or the other and would stop the cubs/scouts from their various activities, especially the weekend ones.
129	Dr Timothy Lester	Whilst in principle there is not a problem about a local move of the hut and associated external space to another nearby location which offers comparable facilities in terms of internal and external space, it is not clear that the proposal to incorporate the hut in a Beveree redevelopment will meet these criteria. Among the factors to consider are: 1. Safety of the scouts – currently the entrance is directly onto a reasonably busy and well lit road. Note that for much of the year the Sea Scouts are leaving and often arriving in the dark. Although parents bring some of the scouts, this does not apply to all of them. Child protection issue will arise with the use of any shared facilities eg CRB checks would be required If facilities are shared but not occupied by different groups at the same time can satisfactory schedules be devised? Has anyone consulted the Sea Scout Group to establish when they meet? Parking should be no more difficult than it is at the moment for parents, leaders and instructors as it is as well as for occasional delivery and collection of boats. Several of the Sea Scouts who attend regularly are physically disabled. My background is that I am 71 years old. I had no involvement with the Scouts until about 5 years ago when the Sea Scout Group was asking for volunteers to keep the Group going. I feel very strongly that older generations should help provide opportunities for young people rather than complain about their behaviour or habits eg spending hours in front of a screen. My concern is that the proposed redevelopment in Station Road may put the future of the group at risk. This is in neither the Council or residents interests. The Scouts must be a very cost effective way of engaging young people from a Council perspective.

Ref. no.	Name/Organisation	Comment
130	Jean Gibson	As the Borough has a long boundary of water, the training given by the Sea Scouts is essential. The Headquarters was paid for by their fundraising and moving will upset many disabled scouts and their families. As an ex Sea Ranger I hope the Scout Group will stay in Station Road.
136	Cllr Janet Langhorne	<p>I have received numerous letters and emails regarding this possible re-development of our Sea Scout Hut in Hampton. I understand how important affordable housing is in our area. However when the land was leased in 1979 it was for a single storey building only. The constraints of this limit the development possibilities. Parking is at a premium in our village and the idea of housing does not fit into the present street scene.</p> <p>The Scout Headquarters serve as valuable asset to our Community. They are formally recognised and inspected by the Royal Navy as only one of 100 such groups to provide such high standards of boating activities and seamanship in addition to normal scout training. There are also facilities for disabled groups who depend on this for their activities</p> <p>To re-locate them to the Beveree is not a viable option especially as they are also under threat of re-development.</p> <p>There has been no proper communication about this either to the people who run this organisation or to the local residents or Ward Councillors. A notice on a lamp post is not an ideal way to gain support for such a plan. We need a Public meeting to discuss this planning proposal with everyone involved present. There are many questions unanswered and these need to be addressed</p> <p>This Sea Scout Hall should remain where it serves our Community best. I oppose this proposal.</p>
139	Jen Osorio	The scout hut site is not large; it is hard to believe that enough housing (both private and affordable) together with parking for the residents can be worth moving a vibrant, active and large youth organisation to another site. Surely leave the scout hut where it is and have more residential accommodation built at the HA 3 site. However, without accurate information (size of the two sites, size of proposed scout hall against the size of the current hall, the number of housing units, parking etc) it is very difficult to give a reasoned response. I understand no meeting has taken place with the scouts and not only would this have been a courtesy to them but might have eased the passage of this proposal.
140	Ann Wise	<p>I was concerned to learn from an article in the Richmond and Twickenham Times (01.11.13) of the proposal for affordable housing to be provided on the site which contains the Headquarters of the 1st Hampton Hill Sea Scouts Group and that the Group had no prior knowledge of this proposal before finding a notice to this effect posted outside the Scout Hut.</p> <p>Whilst appreciating the urgent need for housing, as the general public is constantly reminded, there is also an on-going need to provide service for young people in various aspects of life, including Scouting.</p> <p>As a former Cub Scout Leader at Group and District level, I know what an important part scouting plays in our community and I would urge you to ensure that the Group Leaders concerned are included and consulted in all future discussions, negotiations and decisions concerning their headquarters.</p>
143	Roger Stanley	This site allocation plan of 1 st Hampton Hill Sea Scout Headquarters at 84 Station Road Hampton TW12 1QJ should not take place it is totally inadequate for this site to be moved to the Hampton football ground where the building which has not been built at present. This accommodation won't be the sole use for the 1 st Hampton Hill sea Scout group to use this is totally unsuitable due to fact that this Scout Group has so much personal equipment which can't be left in a place which is not secure as different organization would be using this area also the area of a football ground I believe is not suitable for young persons of ages from 6 years to 18 years to be around.
146	Brenda Stone	Having read the article regarding the 1 st Hampton Hill Scout Group HQ in the Richmond and Twickenham Times (01.11.13) on page 5, I am very shocked and disappointed to read from this article that the future of their HQ is at risk of being demolished by the Council for housing, leaving nearly 100 scouts, beavers, cubs and explorers without an HQ. This building I have known for many years while I was a Guide Division and District Commissioner in the area which included the Hampton Guide District. I

Ref. no.	Name/Organisation	Comment
		recall those who work so hard as volunteers to run this group, giving so much of their time on a voluntary basis. My knowledge of this site is that it is a very narrow site based in Station Road. This I feel being too narrow a site to build housing. Please reconsider such an outrageous idea which I most strongly oppose. At this present time I feel to deprive young people the opportunity offered by this group is a very valuable asset to them and should not be removed from their community.
147	M. Alderson	<p>I was glad to read in the Richmond and Twickenham Times on Friday 1st November that a spokesman for Richmond Council said “the Council greatly values the outstanding work the scouting movement carries out with our children and young people across the Borough”</p> <p>How then do they explain the way they have treated the 1st Hampton Hill Sea Scouts by pinning a notice on their hut explaining there were plans to demolish it. The unit building was paid for by their own fundraising. I am impressed that they are a unit recognised by the Royal Navy, only 100 such units are recognised in the whole country. This means rigorous inspections by the Royal Navy and Scouting which implies a very high standard is maintained. The thought of them closing would be very sad for the locality and especially for the disabled children who gain a great deal from the scouting and boating activities.</p> <p>I appreciate the need for affordable housing but feel there is a greater need for provision for our young people to gain skills and progress as individuals to become responsible citizens.</p> <p>I hope you will consider the needs of the scout unit as paramount..</p> <p>If it is necessary for redevelopment to take place, I trust you will ensure that there is always a meeting place and storage provided for the equipment of the scouts and that you will guarantee them a replacement hall that is suitable for their purposes.</p> <p>The scouters are all volunteers and it is important that they are able to use their time for the benefit of the young people in the movement, not having to worry about where they meet or can store their equipment.</p>
149	Jan Marriot, RuT Forum for Older People	Do not take the Scouts Facilities away, there is no need to re-site this as it serves its purpose and is totally unnecessary.

HA 5 Platts Eyot, Lower Sunbury Road, Hampton
Detailed comments – where respondent objecting to it:

Ref. no.	Name/Organisation	Comment
121	Kevin Scott, Kevin Scott Consultancy	<p>We represent the owner of Platts Eyot, Port Hampton Estates Limited.</p> <p>We broadly support the aims of the Site Allocations Plan in respect of this site. Clearly the historic significance of the Eyot and its importance as an employment site are key aspects of its unique character.</p> <p>The principle of allowing some residential development to create a mixed use development which is sympathetic to this character is also welcomed.</p> <p>Where we have some concerns is with the potential restrictions/contradictions set out in the text regarding the nature of the potential residential use.</p> <p>The SAP recognises that the residential development has a key role to play in terms of the long term viability of the site. This is particularly important in forming a viable plan for the long term maintenance and restoration of the historic elements.</p> <p>The policy should not seek to restrict the potential housing by focussing too closely on live work units.</p> <p>The reference to resisting commuter housing is unclear and unhelpful as it seems to seek to create a distinction in the C3 Use Class that is not supported by the Town and County Planning (Use Classes) Order 1987 (as amended).</p> <p>The characteristics of the island such as the access provisions and its location will ensure that the residential development will</p>

Ref. no.	Name/Organisation	Comment
		<p>have a particular character that will not have the more universal appeal of a more typical housing location within the borough. The same is true of the impact the characteristics of Platts Eyot will have on overall numbers in that they will impose a check to unlimited development. This is already partly recognised in the reference to restricted access and the need to provide safe access in the text.</p> <p>The Council should not seek to restrict the residential use further.</p> <p>We would welcome the opportunity of working with the Council to develop a Masterplan for Platts Eyot..</p> <p>The text should be amended to remove the reference 'to (not) providing solely for commuters'.</p> <p>The potentially important role of residential development in securing the long term future of the site should be given greater prominence.</p>

Detailed comments – where respondent gave no indication if supporting or objecting:

Ref. no.	Name/Organisation	Comment
6	Lisa Charles	<p>HA5</p> <p>Hi, I have concerns around the development proposals for Platts Eyot and impact on local business that run from the island which service local residents. The development discussions with the owners of the island have indicated that the island will be for redevelopment of residential purposes only and businesses will be expected to move premises.</p> <p>However, reading your planning sections for the area it states that business on the island will be supported to continue. Can I ask how this is being done and what checks are being made in this process to guarantee support to local businesses? If it is planned that businesses will need to move will you be able to support relocation? Some businesses on the island provide specialist service to local river residents and we would be at a lost without them.</p>
46	Richard Parish, English Heritage	<p>HA5 Platts Eyot</p> <p>The text requires that proposals should protect the conservation area and contribute towards the restoration of heritage assets. This emphasises the need for guidance on the consideration of the proposals on heritage assets and their settings, to be included within the document. Given the complex nature of the site incorporating designated heritage assets and within an archaeological priority area the site would benefit from more detailed guidance and you may wish to consider preparing a site brief which identifies the constraints and opportunities for the site.</p>

E HA 6 Kempton Gate Business Park, Oldfield Road, Hampton

No comments received

E HA 7 Kingsway Business Park, Oldfield Road, Hampton

No comments received

E HA 8 Castle Business Village, Castle Mews, Station Road, Hampton

Detailed comments – where respondent objecting to it:

Ref. no.	Name/Organisation	Comment
18	Ray Norbury	Perhaps it is time that we moved to a permit holders only situation on Station Road to prevent visitors to the Castle Business Park and rail commuters parking outside my house. Hampton village is also a conservation area. How will the proposed developments impact on the nature of the village and what will be done to ensure that any development is in keeping with village ethos?
21	Alistair Grills, Alistair Grills Associates on behalf of MMC Investments Ltd	<p>The Pre-Publication Site Allocations Plan proposes the designation of, inter alia, the Castle Business Village, Hampton (which includes 36 Station Road) as a Key Employment Site - see below: 2.4.15 Summary of employment needs and how they will be met: 7J Sites to be designated as Key Employment sites (where adopted policies CP19, DM DC1 and DM DCZ will be applied) and Article Four Directions applied to restrict changes of use from offices to residential without permission:</p> <ul style="list-style-type: none"> E HA 7 Kingsway Business Park <u>E HA 1 Castle Business Park</u> E HHI Hampton Hill Business Park E TD 3 Waldegrave Road cluster E TD 5 National Physical Laboratory E TD 6 Teddington Business Park TW11 West Twickenham Cluster (Aft 4 on part) E TW 16 St Georges Industrial Estate E EMO Old Power Station & Tideway Yard E KW1 Station Ave <p>This is followed up on pages 50-51 by reference to the proposed designation of Castle Business Village (Ref E HA 8), Hampton as a Key Employment Site. The Castle Business Village is also shown bounded by a red line. We understand the Council is now intending to apply "Article Four Directions" to certain offices in the Borough which will mean that owners would need to apply for planning permission for change of use. The Council would also endeavour to retain this priority space in office use. Moreover, priority would be given to the application of Article Four Directions on offices that are either in key locations, are purpose-built high quality offices, would meet or could be easily refurbished to meet modern day employment needs, are in locations where there is a demand or are buildings which could be easily converted to residential use (and therefore likely to be at risk of loss to residential use). Our clients, MMC Investments, are freehold owners of the Castle Business Village and would ask the Council to vary the site boundary of the proposed Castle Business Village Key Employment Site to exclude 36 Station Road at the entrance to the Park. The setting and appearance of this former two storey administration building on Station Road contrast with the remainder of the Park which was previously in direct industrial use. 36 Station Road is also the subject of a current Prior Notification application (LBRUT App Ref 13 35A7P3JPA) in respect of conversion from 81a Office to C3 Residential (4 No flats), which is due to be determined before the end of November 2013. Whilst we would request that 36 Station Road is excluded from the Key Employment Site, we confirm that our clients have no objection to the remainder of the Castle Business Village being so designated.</p>

Possible additional sites in Hampton suggested by respondents:

Ref. no.	Name/Organisation	Comment
103	John N. Smith, CgMs	Possible new site

Ref. no.	Name/Organisation	Comment
	on behalf of the Mayor's Office for Policing and Crime	<p>NEW SITE - HAMPTON TRAFFIC UNIT, 60-68 STATION ROAD, HAMPTON, MIDDLESEX TW12 2AX (see attached site plan)</p> <p>PROPOSAL Redevelopment for residential including conversion of locally listed building</p> <p>JUSTIFICATION Hampton Traffic Unit is located within a local centre and designated area for mixed-use. It is in a well connected, sustainable location close to the mainline station and to main arterial roads into and out of Central London. The building currently serves as a policing facility. The services within it will either be re-provided elsewhere or are no longer required following a change in service provision and a rationalisation programme as set out in the MOPAC Police and Crime Plan and Estate Strategy. The car park and building to the rear of the site currently do not positively contribute to the character of the Conservation Area and therefore presents an excellent opportunity to enhance the appearance of the area through redevelopment. Given the locally listed status of the building and its location within the Hampton Village Conservation Area the front building will need to be retained.</p>
126	Carmelle Bell, Savills on behalf of Thames Water	<p>Omission of Allocation of Site at Hydes Field, Land to North of Hampton Water Treatment Works, Upper Sunbury Road Thames Water consider that the site at Hydes Field, as identified on the enclosed plan, should be allocated as a site for a Highly Sustainable Residential Development.</p>
42	Claire Davies, DTZ on behalf of Royal Mail Group Ltd	<p>Background Royal Mail, formerly Consignia plc, is the successor to the former statutory corporation, The Post Office. Although its management operates independently, Royal Mail is wholly owned by the Government through the Secretary of State for Business, Innovation and Skills. Its services are regulated by Ofcom. Its letters business, Royal Mail, is the operator of universal postal functions through the Royal Mail letterpost delivery and collections services, handling letters, postal packets and high value (registered) packets. Royal Mail Group also operates Parcelforce Worldwide, which is a parcels carrier. Post Office Limited (a "sister" company to Royal Mail) operates the national network of post offices and sub post offices. The United Kingdom letter post business has been fully liberalised since the Postal Services Act 2000 and Royal Mail now operates in a highly competitive market place. As such, it effectively operates like any other business and is continually seeking to find ways to improve the efficiency of its business (e.g. increased automation) and respond to the changes in communications technology (e.g. email and internet). Put simply, the nature of the mail industry has, and continues to change and Royal Mail's real estate needs to respond accordingly.</p> <p>Royal Mail Properties Royal Mail has a statutory duty to provide efficient mail sorting and delivery services for the administrative area of the London Borough of Richmond upon Thames. The following freehold Royal Mail properties are located in Richmond upon Thames: Hampton Delivery Office, Rosehill, Hampton, TW12 2AA Teddington Delivery Office, 19 High Street, Teddington, TW11 8EG Mortlake And Barnes Delivery Office, 2-12 Mortlake High Street, London, SW14 8JB The following leasehold Royal Mail properties are located in Richmond upon Thames: Richmond Delivery Office, 2 Park Lane, Richmond, TW9 2RL</p> <p>Policy Considerations Our representations set out in this letter accord with the National Planning Policy Framework (NPPF) (2012) which "provides a presumption in favour of sustainable development" from which we consider the following to be of particular relevance: That plan-making should "positively seek opportunities to meet the development needs of their area...with sufficient flexibility to</p>

Ref. no.	Name/Organisation	Comment
		<p>adapt [to] rapid change, unless: Any adverse impact of doing so would significantly and demonstrably outweigh the benefits” (paragraph 14); That planning should “encourage and not act as an impediment to sustainable growth. Therefore significant weight should be placed on the need to support economic growth through the planning system. To help achieve economic growth, local planning authorities should plan proactively to meet the development needs of business and support an economy fit for the 21st century” (paragraphs 19-20); That planning policy should “support existing business sectors, taking account of whether they are expanding or contracting...policies should be flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances” (paragraph 21); and “Plans should protect and exploit opportunities for the use of sustainable transport modes for the movement of goods or people. Therefore, developments should be located and designed where practical to accommodate the efficient delivery of goods and supplies” (paragraph 35).</p> <p>Representations</p> <p>Whilst there are no current plans for Royal Mail’s Delivery Offices in the administrative area of Richmond upon Thames to be closed or relocated, we request the inclusion of the following freehold properties, shown on the enclosed site plans, within the draft Site Allocations Plan:</p> <p>Hampton Delivery Office, Rosehill, Hampton, TW12 2AA Teddington Delivery Office, 19 High Street, Teddington, TW11 8EG Mortlake And Barnes Delivery Office, 2-12 Mortlake High Street, London, SW14 8JB</p> <p>Hampton Delivery Office is surrounded by residential uses including a recent residential development to the north and east. Teddington Delivery Office is surrounded by residential, retail and employment uses. Mortlake and Barnes Delivery Office is surrounded by residential and employment uses.</p> <p>The redevelopment of these sites for residential use (potentially as part of mixed use schemes) may therefore be appropriate in this context, in accordance with the requirement of the National Planning Policy Framework for the development of sustainable communities.</p> <p>It should be noted that the relocation/re-provision of Royal Mail’s operations is essential prior to redevelopment of the sites. This will ensure that their operations will not be prejudiced and that they can continue to comply with their statutory duty to maintain a ‘universal service’ for the UK pursuant to the Postal Services Act 2000.</p> <p>Furthermore, in order for these sites to be brought forward for redevelopment, relocation will need to be viable for and commercially attractive to Royal Mail.</p> <p>The proceeds from the disposal of the sites will need to yield both sufficient value to fund the purchase and fit-out of new sites and the relocation of their operations thereto. There will also need to be a commercial attractiveness that would incentivise the business to relocate the operations. In addition, it would be essential that any new facilities are provided prior to the demolition of those existing, to ensure Royal Mail’s continuity of service.</p> <p>This approach accords with adopted Government guidance set out in the National Planning Policy Statement (NPPF) (March 2012) which advises that local planning authorities should help achieve economic growth by planning proactively to meet the development needs of business and support an economy fit for the 21st century. The NPPF also advises that local planning authorities should support existing business sectors, taking account of whether they are expanding or contracting. It also states that policies should be flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances (Paragraphs 20-21).</p>

Ref. no.	Name/Organisation	Comment

Sites in Hampton Hill

E HH 1 Hampton Hill Business Park, High Street, Hampton Hill

No comments received:

E HH 2 St Clare Business Park, Holly Road, Hampton Hill

No comments received:

Sites in Teddington

TD 1 Telephone Exchange, High Street, Teddington

Detailed comments – where respondent supporting it:

Ref. no.	Name/Organisation	Comment
134	Alison Davey, Teddington Business Community	Partial retail on the ground floor is a viable solution. The proposed appearance should indeed be in keeping with the historic town centre buildings and with consultation with the Edwardian immediate neighbouring properties (fashion shop and restaurant). The size of the proposed retail build, should BT ever vacate, needs to be in keeping with small retail. A supermarket or restaurant chain would not be appropriate for this site as it would affect existing retailers and the identity of Teddington as a destination shopping town with special shops.

Detailed comments – where respondent objecting to it:

Ref. no.	Name/Organisation	Comment
3	Hilary Bishop, Telereal Trillium	There would be no possibility whatsoever in the foreseeable future (beyond say 2025) to dispose of any one of the three sites in Richmond. Theoretically it would be possible to redevelop the sites but the costs in trying to vacate the exchanges runs into the hundreds of thousands and BT are not able to offer the buildings at present. Please remove them due to undeliverability.

TD 2 Strathmore Centre, Strathmore Road, Teddington

Detailed comments – where respondent supporting it:

Ref. no.	Name/Organisation	Comment
134	Alison Davey, Teddington Business Community	Housing only.

Detailed comments – where respondent objecting to it:

Ref. no.	Name/Organisation	Comment
14	Sarah Dietz	<p>The proposal states that residential development is planned for the Strathmore centre (section 3.3.2) “Subject to relocation and alternative provision for the existing on-site social infrastructure use” but there is no mention in the plan of where this relocation may be. The current provision on this site is essential to the local school community and it would be very harmful if it were removed or relocated to a smaller facility or a facility further away from the schools it serves.</p> <p>The childcare, SCAMPS, on this site at the moment is an essential component to my child’s schooling and care whilst I’m at work. It critically offers pick-up and drop-off from Stanley school and is flexible enough to allow my child to attend school clubs. Continuity of the school community within SCAMPS is vital - school friends attend together and support each other. The environment, although tired and in desperate need of a refurbishment, is stimulating and offers a great deal of outside space which is essential to my children after a cooped up day at school. The location of SCAMPS, so close to Stanley and St James’, makes it an invaluable resource to local families. My view is that a well planned refurbishment of SCAMPS on its current site would serve the community best.</p>
15	Michelle Hatton Smith	<p>Strathmore road is a one way street, with heavy traffic congestion during the morning and afternoon school open times. adding more houses to this area would add to the congestion and be against the transport strategy 2010, which was to smooth traffic flow.</p> <p>The proposed residential buildings would add to the numbers of children in social housing who do not have local access to outdoor play space suitable for over eights.</p> <p>Stanley school will have over 900 pupils attending making it one of the biggest primary schools in the borough. it has no local children's playground and the proposed development would add to the numbers of children who have no outdoor play park within a suitable walking distance. the area should be proposed as a children's play facility suitable for over eights. other smaller schools in Teddington and Twickenham have local playgrounds for their pupils to use after school. the Strathmore area has a high number of social housing, but is deficient in outdoor play opportunities.</p>
22	Jill Paterson	<p>I would like to make two comments on the proposals relating to the Strathmore Centre.</p> <p>My children attend Stanley Primary and are users of SCAMPS for Breakfast Club, After-School Club and Holiday Club. The scale and convenience of the SCAMPS before and after-school childcare provision for Stanley pupils is unique - no other provider in the area is able to offer anywhere near such a service. It is hard to imagine that other providers would be able to scale up their provision to cater for all the need should SCAMPS no longer be able to operate, and none can offer the flexibility of attendance allowed by such a close location. It is therefore essential that the council act to ensure that the "relocation and alternative provision for the existing on-site social infrastructure use" can be achieved with the minimum possible impact on the service before any alternative development takes place. It is worth noting that it would not be possible for the same service to be provided (whether on a temporary or short term basis) from the school site: for the children, one of the key benefits of SCAMPS is that there is a clear separation from school - this is not a continuation of the school day (or like being sent to school during the holidays) because it is in a clearly separate location and has facilities that the school would not be able to offer (its own kitchen, large hall always available, and significant dedicated outside area).</p>

Ref. no.	Name/Organisation	Comment
		<p>As a relatively near neighbour to Strathmore Road, I am very aware of the problems associated with very limited parking in the area, particularly around the times of school drop-off and pick-up. As Stanley school expands, pupils from further away attend and it is inevitable that the number of cars parking near the site will also increase. At the moment, the 'car park' in the area earmarked for development (and the cul-de-sac leading to it) are heavily used at peak times and without these, the parking in the surrounding areas would be even worse. When considering the details of the redevelopment, it will be important for parking to be allowed not just for the residents of the new housing, but also some allowance for parents at the school.</p> <p>For the purpose of transparency, I should note that I am a member of the Board of Directors of SCAMPS, although I am responding on my own behalf rather than for SCAMPS.</p> <p>The plan already notes that redevelopment should be "Subject to relocation and alternative provision for the existing on-site social infrastructure use". The council should ensure that this is achieved before the development starts, and with the minimum possible impact on the facilities provided by SCAMPS.</p> <p>The redevelopment plan should take into account the current use of the road and car park in the earmarked area for car parking by parents on the 'school run' - not providing a replacement for this would have an impact on the surrounding roads.</p>
24	Joan Senior	<p>I am writing in my capacity as Chair of the Board of Management of Stanley Combined AM/PM project Ltd. This non profitmaking company has existed since 2004. All the board are volunteers, who give up their time to support the running of SCAMPS. SCAMPS has been providing childcare for the last 30 years and has grown from the original 20 children to 400 with sessional childcare for 50 weeks per year. We collect and deliver on foot to Stanley Primary School and ST James Primary School, including collection from the after school clubs which enhance and broaden the children's educational experience.</p> <p>Stanley School has still not reached its final capacity and already we have had to expand into the Strathmore Centre to accommodate our over 8 children. In providing collection of about 10% of the school population on foot, we have a considerable role to play in reducing the traffic congestion in the morning and the evening. It is essential that we are part of the proposed redevelopment. The wording while recognising the need for "the relocation and alternative provision for the existing on-site infrastructure use" does not make the commitment that this should be on site, nor does it refer to SCAMPS even though the relevant council minutes do. In view of the current policies on commissioning, we would like reassurance that 30 years of service to this community will not be ignored.</p> <p>While we are totally supportive of the importance of building homes, we do have several concerns.</p> <ol style="list-style-type: none"> 1 The area around Shacklegate Lane/Strathmore Road is already very congested, especially at school drop off and collection times. Even though the plans include off road parking, a dense development would inevitably create further congestion. 2 There is inadequate green space in this area already, we are concerned that the plans should include at least as much green space as is currently available. 3 There is already a parking problem in this and the adjacent areas as the bus garages and the Volkswagen garage do not have sufficient on site parking. Cars are parked for the whole day and impede access for emergency vehicles. Consultation papers are already out for further double yellow lines in the upper part of Stanley Road and the possibility of a CPZ for the South Road/Hampton Road/Stanley Road area. If this happens, the parking will move across the railwayline to the area round Stanley school, which is already severely congested. Parking allocated for the staff at Stanley school is inadequate for the number of staff employed. <p>We employ over 30 staff. many of these live locally and come to work on foot or public transport but a considerable number need to come by car because they cannot afford property in this area. Parents need to pick up and drop off small children. Some provision will need to be made.</p>
40	Jo Jamieson	I am a local resident and my two daughters attend Stanley Primary School and SCAMPS. I am concerned about the future of

Ref. no.	Name/Organisation	Comment
		SCAMPS. As a working parent I would be unable to survive without the before school and afterschool provision provided by SCAMPS. The care is fantastic, the activities varied and the proximity to the school and outside space fantastic. No mention is made in the proposal of where an alternative site would be, how many children it could take, and if there would be outside space. Car parking in the entire area around Stanley Primary Schools is chaotic. On site parking is mentioned in the proposal, but increased traffic in the area will be dangerous to the children.
88	Rebekah Knott	The proposal for site TD 2 states that redevelopment is 'subject to relocation and alternative provision for the existing onsite social and infrastructure use...' however, it is my understanding that at the current time there are no alternative sites proposed/available for the relocation of SCAMPS childcare provision. As a local resident and user of SCAMPS I would strongly oppose redevelopment of this site without a reasonable alternative site secured for SCAMPS relocation. SCAMPS provides an essential childcare service to a significant number of working parents in the area and with very limited alternative provision for this kind of childcare (wraparound/afterschool) locally it is critical to ensure that SCAMPS can continue to operate. Please confirm what alternative sites have been identified for the relocation of SCAMPS childcare centre
89	Jolyon Knott	The proposal for site TD 2 states that redevelopment is 'subject to relocation and alternative provision for the existing onsite social and infrastructure use...' however, it is my understanding that at the current time there are no alternative sites proposed/available for the relocation of SCAMPS childcare provision. As a local resident and user of SCAMPS I would strongly oppose redevelopment of this site without a reasonable alternative site secured for SCAMPS relocation. SCAMPS provides an essential childcare service to a significant number of working parents in the area and with very limited alternative provision for this kind of childcare (wraparound/afterschool) locally it is critical to ensure that SCAMPS can continue to operate. Please confirm what alternative sites have been identified for the relocation of SCAMPS childcare centre
92	Rachel Hughes	I am responding to the consultation in relation to the proposed redevelopment of the Strathmore Centre, Scamps and proximal land for residential purposes. This seems to be to be overdevelopment of a site which is already severely constrained for both access and parking, and which is currently used by a large proportion of the school population of Stanley school and their siblings. As a parent with children who are at Stanley, I would be unable to work if it were not for the very close proximity of Scamps to the school. My children are a mixture of school and pre school age, and yet they can all be together at the start and end of the day, and be taken on foot, to school in safety. Further, they can participate in after school clubs, which alternate child care provision (if I could find it) would not allow them to do, as Scamps will pick up at the end of the school day, as well as on completion of after school clubs. The Scamps site is amazing for children- large open, yet shaded areas, where they can play outside in safety, and get plenty of exercise and fresh air. The parking situation at Stanley School is horrific at present, and there is huge congestion, both vehicular and pedestrian at school drop off and pick up times. If the close-by wrap around care is removed, then I for one will be unable to work, and hence me, and parents like me will increase congestion at these daily pinch points. The school has no space to provide wraparound care for anything like the numbers of children that use Scamps. Given that the school has significantly increased in pupil numbers in the last 3 years, and this will continue as the additional classes work their way up the school, it would be extremely remiss to remove a facility such as Scamps which can accommodate children safely, which is crucial to many parents in enabling them to work, and to bring money into the local economy. I hope that any redevelopment of this site will ensure that not only is Scamps retained with adequate outside space, but that parking and access is given due consideration given the challenging aspects of this site, and the disruption caused to current residents, let alone

Ref. no.	Name/Organisation	Comment
		those who may locate there if the site is developed. It seems a development too far, in my view The site should only be considered for very limited residential development, with adequate parking spaces within the development for residents, commensurate with the properties built. Eg, if flats, 2 parking spaces per 9 flats as in the development on the corner of Shacklegate Lane is clearly not adequate, and will exacerbate parking issues for current residents. The Scamps provision should be either retained where it is, or relocated within the proposed development area to be closer to the schools it serves, with similar outside space as part of any relocation within the site. The safety of the children should be paramount.
91	Victoria Phillips	Part of this site should continue to be used to provide out of school care for the vastly increased number of children at Stanley School and in the area generally, and also to provide youth club facilities for the vastly increased number of children and young people in Teddington for whom there are no purpose built facilities.
157	Joanne Merritt, Chair Stanley Primary Governing Body	<p>This is a joint response to the consultation on behalf of the Governing Body of Stanley Primary School & SCAMPS, provider of before/after school care on the Strathmore site.</p> <p>SCAMPS has been providing before/after school care to the local community for 30 years. Its service is vital to many Stanley Primary School families and any proposed redevelopment of the site must ensure this provision continues. Indeed, the LA Cabinet acknowledged the importance of Scamps at their meeting on 15th November 2012. The minutes state 2.5 Note that the future terms of sale for the Strathmore Centre should include ongoing provision for Scamps to be accommodated within the footprint of the existing land.”</p> <p>Approximately 10% of the school’s current population attends SCAMPS on a regular basis. As a 4 form entry school those numbers are large & set to grow as the school continues to expand. SCAMPS is recognised as an integral part of our school community without which many families would struggle to manage their childcare needs.</p> <p>SCAMPS’ location so close to Stanley Primary ensures that all children at Stanley have the opportunity to participate in after school clubs & activities further enriching their school experience. This is only possible because SCAMPS is housed on the Strathmore site. It is essential that the provision remains where it is in order to allow multiple pick ups from school at different times.</p> <p>In addition, the large numbers & wide age range of the children demands that there should be no reduction in the physical size of the facility. It is also imperative that outside space is maintained for the children’s use.</p> <p>It should be noted that the large number of children walking to and from the school to SCAMPS has a considerable impact on keeping down the traffic congestion at pick up and drop off times since it staggers the pressure. However, any redevelopment of the Strathmore site must include sufficient additional parking. The surrounding area already suffers from inadequate parking & a congested one-way system which is especially evident at the start & end of the school day.</p>
122	Cllr Elloy for Fulwell and Hampton Hill Councillors	<p>There has been a long acknowledged need for play space in this part of Teddington, as was illustrated in the Unitary Development Plan. Although there are schools in the area there is no public play space and this site is effectively the only remaining land in the ward which could meet that need.</p> <p>In consequence we oppose the development of this land solely for housing purposes.</p> <p>We do support the development of part of the site for community use, leaving the rest for use as playground and some affordable housing. We also support the Governing Body of Stanley Primary School & SCAMPS, the Before and After School Club, in its case to retain this site as a base for wraparound care.</p> <p>SCAMPS is long established and was set up with Council support and used as the model for similar Before and After School Clubs set up elsewhere in the borough. It has been based on this site since its inception, and is vital to many Stanley Primary School families and to parents from other local Primary schools.</p> <p>The importance of Scamps was fully accepted by the Cabinet, and by Cllr. Samuel in particular, and was acknowledged at its</p>

Ref. no.	Name/Organisation	Comment
		<p>meeting on 15th November 2012. The minutes state 2.5 Note that the future terms of sale for the Strathmore Centre should include ongoing provision for Scamps to be accommodated within the footprint of the existing land.”</p> <p>Indeed, at the September Cabinet Meeting, it was agreed that that there should be reprovision for Scamps on the Strathmore site – which assumes a capital cost of £500,000 on 0.25 acre - with the remainder of this 1.546 acre site for 3, 2 and 1- bed affordable units (21 homes).</p> <p>Why was this not properly reflected in the Consultation document?</p> <p>Stanley School is an important element of the Council’s strategy to deal with the growing demand for Primary Education, and its numbers are growing as the school expands year by year to become a fully fledged four form entry school. Approximately 10% of the school’s current population attends SCAMPS on a regular basis. These numbers will no doubt grow as the school continues to expand. In addition, SCAMPS is located close to both St James’s School, and St Mary’s and St Peter’s School, and offers its service to what is something of a Primary School Campus stretching down Stanley Road.</p> <p>In order for these schools to be provided with the Before and After school care offered by SCAMPS, It is necessary that is located close by Stanley and the other Schools. This was acknowledged by the Cabinet when it agreed that SCAMPS should accommodate within the footprint of the current Strathmore site. There is nowhere else within convenient distance to accommodate SCAMPS, so relocation is not an option. The other great advantage offered by its present location is that all children at Stanley have the opportunity to participate in after school clubs & activities, further enriching their school experience. This is only possible because SCAMPS is housed on the Strathmore site. It is essential that the provision remains where it is in order to allow multiple pick-ups from school at different times.</p> <p>It is important to understand that SCAMPS, besides accommodating a large number of children, also caters for a wide age range. In consequence it is important that there is no reduction in the space provided – indeed we have already pointed out that numbers will increase – and that outside space is provided for the use of the children.</p> <p>Finally, something must be said about the parking problems surrounding the Strathmore site. There is already high demand for parking locally, and there is huge, and growing, congestion at drop off and pick up times. This will only get worse as the size of the school grows, and the increase in congestion caused by the initial growth of the school is already very apparent. SCAMPS does offer some mitigation of this problem. Congestion is reduced simply because drop off and pick up times are staggered as parents arrive and depart before and after peak times.</p> <p>The recommendation currently in the Consultation should be deleted, and at the very least, replaced by the Cabinet’s decision to make reprovision for Scamps on the Strathmore site. Ideally, it should be replaced by the following: "Reprovided childcare centre, new children's playground and affordable housing"</p>
156	Molly Gartland	<p>Strathmore Centre, Strathmore Road (3.3.2) I am a parent at Stanley Primary, which is across the road from the Strathmore Centre. My youngest child used the nursery facilities at SCAMPS before he entered the nursery at Stanley. I believe that many of the friendships that were formed at SCAMPS, helped him enormously to transfer to Big School (especially a 4 form very large school!) Additionally, my children have used the before/after school provision at SCAMPS. It is essential that SCAMPS, which is convenient for both St. James and Stanley, remains close to Stanley and St. James. I do believe that the SCAMPS footprint is very large, and the space could be better allocated. However, they should remain there, with a slightly smaller facility. The Strathmore neighbourhood is very congested, especially with the expansion of the school. Rather than filling this entire area with housing, I think it should be used for SCAMPS, housing, and a further hall/gym for Stanley. Perhaps this facility could also be shared with SCAMPS? With the expansion of Stanley, it is my opinion that the school is already beginning to feel the pinch of being a 4 form primary and it is not even full, yet! While there are a sufficient number of classrooms, there are very few large communal indoor areas for such a large school. I believe that the school would benefit from another multi-use hall/gym/theatre</p>

Ref. no.	Name/Organisation	Comment
		<p>facility. Given that it is the largest primary school in the borough, I encourage the council to speak to the school and use this Strathmore site for housing as well as community use.</p> <p>Previously, when Stanley was a split school the infants had a hall and dining hall (which have been demolished). The juniors had the gym and the hall (which remain) and the only other communal space added is the Studio, even though another 240 students have been added to the school. I encourage to look at this site holistically and take into account the needs of existing community facilities, SCAMPS and Stanley Primary. Given that this area is already congested, this site is not suitable to be 100% housing. Please consider using this land for both community and residential purposes.</p>

Detailed comments – where respondent gave no indication if supporting or objecting:

Ref. no.	Name/Organisation	Comment
134	Alison Davey, Teddington business Community	<p>TD 6 Teddington Business Park, Station Road, Teddington</p> <p>No comment</p>

E TD 3 Waldegrave Road Cluster, Teddington

Detailed comments – where respondent supporting it:

Ref. no.	Name/Organisation	Comment
134	Alison Davey, Teddington Business Community	<p>TD 3</p> <p>Retail and commercial space should remain as is in Waldegrave Road. Should the site of the old Dairy be converted into residential, then there should be no retail premises here as this would be detrimental to existing Waldegrave Road retail.</p>

Detailed comments – where respondent gave no indication if supporting or objecting:

Ref. no.	Name/Organisation	Comment
142	Ciara Whelehan, URS on behalf of South Eastern Power Networks plc	<p>TD3</p> <p>The site in question, 23 Waldegrave Road, is owned by South Eastern Power Networks plc, and is a redundant electricity sub-station (see Appendix 1 for site location). The site is currently partially vacant. My client believes that the site should be released from the Key Employment Designation in the emerging Site Allocations Document for residential use.</p> <p>Introduction</p> <p>South Eastern Power Networks plc fully supports the Council's overall approach to identifying site allocations in the borough, to deliver the aims and objectives of the Core Strategy, up to 2030. South Eastern Power Networks also recognises the need for the Council to have a clear policy framework in place to deliver on buildings and sites in order to establish certainty for developers wishing to invest in the borough.</p> <p>The National Planning Policy Framework (NPPF) gives priority to providing more housing throughout the country to provide a supply of housing to meet the needs of present and future generations. At the same time, national policy states that local authorities should meet objectively assessed need, proactively drive and support sustainable economic development to deliver</p>

Ref. no.	Name/Organisation	Comment
		<p>the homes, business and industrial units, infrastructure and thriving local places that the country needs. Furthermore, every effort should be made to respond positively to wider opportunities for growth. To boost significantly the supply of housing, local authorities must identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements, with an additional buffer of 5% to ensure choice and competition in the market for land. Authorities are also required to plan for an appropriate mix of housing size, types and tenures to meet projected needs and densities to take account of the local area.</p> <p>The London Plan recognises the pressing need for more homes in London, and sets out that all boroughs should seek to achieve <i>and exceed</i> the relevant minimum annual average housing targets. The London Plan sets an annual housing target of 2,450 homes for Richmond between 2011 and 2012 (annual target of 245 units). The context of the 2011 census and the most recent GLA projections suggest London's population is growing faster than was the forecast at the time of the development of the 2011 London Plan. This will place additional pressure on boroughs to find suitable and available land to meet the increased housing need.</p> <p>The London Plan's overall policy approach is to seek to optimise housing provision and provide for choice and good quality design.</p> <p>The London Plan housing targets are now being revised following completion of a London wide SHLAA. The draft targets are expected to be available by early 2014. In order to ensure the revised London Plan target can be met, it will be necessary to identify further housing sites in the borough.</p> <p>Richmond's Core Strategy sets out broad locations for the distribution of housing provision. It generally focuses on reinforcing the role of Richmond, Twickenham, Teddington, Whitton and East Sheen centres, and a pattern of urban villages. Up to 2017, indicative housing ranges for these centres have been identified. For Teddington, the range is between 700 and 800.</p> <p>The Council's recent Annual Monitoring Report (AMR) 2011/12 identified a net gain of 208 units completed in 2011/12. This is slightly below the borough's housing target. Identifying additional housing sites will seek to ensure that the borough continues to achieve and exceed the London Plan housing targets.</p> <p>In line with the London Plan, Local Development Frameworks should manage long term structural change in the office market and ensure that there is enough office space of the right kind in the right location, encourage renewal and modernisation in viable locations and <i>support changes of surplus office space to other uses</i>.</p> <p>Comments on Pre-Publication Site Allocations Plan E TD 3 Waldegrave Road Employment Cluster</p> <p>The consultation Site Allocations proposes to designate Waldegrave Road Cluster as a Key Employment Site. Waldegrave Road is located on the edge of Teddington Town Centre and includes a number of buildings and uses including a HQ office building (no.8), vehicle repair and sales garage, Offices, TV company, former buildings joinery , office units (some unoccupied), Harlequin House-offices, solicitors, workshops, library, dentist and charity offices. Access is very good and is close to Teddington Station.</p> <p>South Eastern Power Networks largely supports this proposed designation, however, considers that the site to the south of the cluster (attached) should be released for residential use for the following reasons:</p> <ul style="list-style-type: none"> the site is not a preferred office location, it is hemmed in by housing; it is partly vacant and surplus to South Eastern Power Networks requirements; the current uses within the cluster include a mixture of A use classes and D use classes which would complement residential; the potential for the site to contribute to the borough's housing target, particularly the housing conversion target; <p>according to Richmond's Core Strategy, Richmond and Twickenham are amongst the few outer London centres where there</p>

Ref. no.	Name/Organisation	Comment
		<p>remains a demand for modern office floorspace; the site is no longer commercially viable and there is no reasonable prospect of the site being used for that purpose; it would not have a significant impact on the local economy and the provision of local jobs; the main office centre is Richmond, with its low cost alternative Twickenham, and a large but less active centre in Teddington; Teddington Town centre is a compact centre of a size appropriate for a second-tier centre in a borough like Richmond. There is good scope to concentrate office use on the high street, and in less marginal locations like the southern part of the Waldegrave Road cluster; South Eastern Power Networks considers that the site has the potential to deliver a high quality residential scheme, set in a high quality well landscaped environment. Conclusion South Eastern Power Networks recognise that identifying and including this locally important employment area in the Site Allocations Plan will help to secure the long-term future of employment and services in the area. The cluster of employment uses to the east of Waldegrave Road, in particular, would retain a number of different business uses and employment land of a suitable size in an appropriate location close to the station and town centre. Although the employment cluster at Waldegrave Road provides essential local services, land for employment and business opportunities in a sustainable location, South Eastern Power Networks consider that the boundary should be redrawn to exclude the site, as shown on the attached map in Appendix 1. Releasing this land to residential use would not have a significant negative impact on the local economy and the provision of local jobs. Recommended Change Remove 23 Waldegrave Road (as shown in Appendix 1) from the proposed designation of Waldegrave Road cluster as a Key Employment Site.</p>

TD 4 Teddington Studios, Broom Road, Teddington

Detailed comments – where respondent supporting it:

Ref. no.	Name/Organisation	Comment
134	Alison Davey, Teddington Business Community	Housing only. The move of Haymarket and Teddington Studios is a keen loss for Teddington's retailers in these difficult economic times. The TBC has had a discussion with planners and have been assured that there will be no retail on this site.
170	Sarah Considine, Greater London Authority	The Council's proposed strategy to redevelop the Teddington Studios site for residential use, and to off-set the loss of employment floorspace at that site with the provision of office floorspace as part of the redevelopment of the Richmond upon Thames College site, does not raise strategic concern in principle, subject to appropriately securing the site strategy through the planning application process. Furthermore, the Council's aspiration to retain the existing office occupier at the Teddington site within the borough, is supported. However, there are concerns that the explicit requirement for headquarter-type office floorspace within the document will lead to applicants attempting to seek excessive development costs, to the detriment of affordable housing provision. This raises strategic concern, and would not be supported. As such, the document should refer only to the requirement for replacement office floorspace provision, and not dictate a preference for the style or type of such provision. For the avoidance of doubt, the cross-subsidisation of office floorspace by housing, to the detriment of affordable housing provision,

Ref. no.	Name/Organisation	Comment
		<p>would not be supported.</p> <p>Furthermore, in accordance with London Plan Policy 3.12, explicit reference should be made to the need to ensure that any residential development at the Teddington Studios site will be required to include on-site affordable housing. GLA officers are aware through pre-planning application discussions that there has been a suggestion by the applicant that off-site provision of affordable housing would be proposed. As has been made clear to the applicant, off-site provision of affordable housing would not be acceptable. The document, as currently drafted, is potentially unclear in the Council's expected approach to affordable housing on both sites, and for clarity each site allocation designation should include a specific requirement for on-site affordable housing. Finally, given the nature and scale of the existing studio space, its loss does not raise strategic concern.</p> <p>In addition, TfL looks forward to working with the council to explore the access proposals associated with the development of the college site.</p>

Detailed comments – where respondents objecting to it:

Ref. no.	Name/Organisation	Comment
91	Victoria Phillips	<p>TD 4</p> <p>I consider that the preferred option (option B) for the site does give enough weight to existing planning policies, that the sustainability appraisal does not sum up the pros and cons sufficiently and that there is insufficient evidence to support such a dramatic change of use. It appears that this change of use is only being put forward to maximise the funding of redevelopment on another site (TW10).</p> <p>1. Loss of employment land.</p> <p>Policy DM EM2 of the Development Management Plan sets out conditions which must be applied where a change of use from employment land is contemplated, including extensive marketing for 2 years for existing use and redevelopment, and then a sequential approach involving consideration of first solely employment based redevelopment, then mixed use with some housing including maximum affordable housing, before considering a purely residential redevelopment. No attempt to apply these policies has been made so it is very premature to recommend option B.</p> <p>This proposal also contradicts many other statements made elsewhere in the documentation, for example:</p> <ul style="list-style-type: none"> in the Site Allocations Plan in 2.4.4 where the position is stated to be that the Council seeks through DM EM2 to retain employment land "unless there are exceptional reasons for release" and that employment land should be provided close to residential areas and spread throughout the Borough. In 2.4.6 the Council states that it is concerned about loss of office space and in 2.4.11 that there is a lack of employment land, especially for light industrial use; in the Sustainability appraisal under para 2.1 discussing the PPP analysis under Economic Development and in Annex 2 it is said that "there is a strong case for the local plan to protect all existing employment sites unless they are inherently unsuitable" ; and in relation to site ETD3 Waldegrave Road cluster which is also in Teddington it is said that "any loss of these facilities to residential uses would be harmful to the local businesses, reduce further land for expansion of employment uses, lead to the loss of jobs and would have cumulatively a very negative impact on the local economy". Exactly the same argument applies to Teddington Studios. <p>Teddington has lost two large employment sites already in recent years - in Somerset Road to residential and at the Travelodge in Station Road where a large office block was converted to a hotel providing only a few low paid jobs. Reproviding some office accommodation several miles away in Twickenham is not sufficient to overcome the objection to the impact of this change of use</p>

Ref. no.	Name/Organisation	Comment
		<p>in Teddington.</p> <p>2. Development on a flood plain This site is in zones 3a and 3b so in the highest category of flood risk. Policy SD6 states that "proposals for the change of use or conversion to a use with a higher vulnerability classification will not be permitted" and that "basements ... will not be permitted" - underground car parking is used by humans who will be at risk.</p> <p>3. Pressure on local services There is an severe shortage of school places in Teddington with children already having to leave Teddington to go to school and another large development will exacerbate the problem. This development is in one of the many blackspots for primary school places. It is near Teddington School for secondary schooling but children who get in from there will just displace children further away at the Broad Street end of Teddington where a black hole has opened up in the Stanley/Hampton Road area, especially for boys. All the primary schools have already expanded and the GLA is predicting that there will be a 17% increase in the number of primary school children across Teddington, Hampton Wick and Fulwell wards by 2017 (on 2012 numbers) – that's 461 more children needing places already without this large development. There is also a huge pressure on GPs with getting an appointment becoming harder and harder, and Teddington Hospital walk in centre having 3-4 hours waits.</p> <p>I realise that the Council wishes to find more land for housing but it seems that it has allowed a disproportionate amount of new residential development in Teddington in recent years compared to other parts of the Borough and that it is not having much difficulty meet its current targets. I would be more in favour of some residential provision on this site if it were to be affordable housing, but it seems apparent from conversations at the exhibition that the developer of this site will argue against the provision of 50% affordable housing on the basis that they are providing some public access and that it is an expensive site to redevelop because of the proximity to the river, the need to excavate underground for car parking and spots of existing contamination in the land. I would not be surprised if they argued against providing any affordable housing at all as have other developers in central Twickenham recently.</p>

E TD 5 National Physical Laboratory, Hampton Road, Teddington

Detailed comments – where respondent gave no indication if supporting or objecting:

Ref. no.	Name/Organisation	Comment
46	Richard Parish for English Heritage	ETD5 National Physical Laboratory From our records this site appears to include the Grade II listed Teddington Hall. As such we would recommend including a statement saying that any physical redevelopment within the site would need to preserve or enhance the setting the listed Hall.
134	Alison Davey, Teddington Business Community	No comment

E TD 6 Teddington Business Park, Station Road, Teddington

Detailed comments – where respondent gave no indication if supporting or objecting:

Ref. no.	Name/Organisation	Comment
134	Alison Davey, Teddington Business Community	No comment

Possible additional sites in Teddington suggested by respondents:

Ref. no.	Name/Organisation	Comment
167	Michael Foss, Convenor, Teddington Society Planning Group	We have noted the sites designated in Teddington. Among these there is no mention of the North Lane car park. This site, as you may be aware, is made up of the existing car park, plus quite a large area which is boarded up and derelict, and has been in that condition for some time. In the past we have suggested that it should be used, at least in part, as a children's playground - there is a shortage of a facility of that kind in the immediate vicinity. We were also led to understand that it was designated for affordable housing - another useful purpose. The site at present appears to be in no-man's land; should it not be included in the Allocations Plan, hopefully with a designation for either - or both - of the above-mentioned uses.?
42	Claire Davies, DTZ on behalf of Royal Mail Group Ltd	For Background, Policy and viability see response 42 for Hampton We request the inclusion of the following freehold properties, shown on the enclosed site plans, within the draft Site Allocations Plan: Teddington Delivery Office, 19 High Street, Teddington, TW11 8EG Teddington Delivery Office is surrounded by residential, retail and employment uses. The redevelopment of the site for residential use (potentially as part of mixed use scheme) may therefore be appropriate in this context, in accordance with the requirement of the National Planning Policy Framework for the development of sustainable communities.

Sites in Twickenham

TW 8 Harlequins Rugby, Langhorn Way, Twickenham

Detailed comments – where respondent supporting it:

Ref. no.	Name/Organisation	Comment
133	Dale Greetham, Sport England	Support - site policies should specifically state that the existing sports facility provision will be protected: Support (with amendments)

Detailed comments – where respondent objecting to it:

Ref. no.	Name/Organisation	Comment
150	Douglas Craik	<p>Since developments took place at the Stoop Ground some years ago, traffic leaving this site by way of Craneford Way has in theory been restricted to members leaving the Nuffield Health Club. There have been many occasions when this restriction has had to be enforced under 09/1872/FUL due to the barrier between the Stoop site and Craneford Way being out of action. Even when the barrier is operating, it is evident from the volume of traffic passing through it that many of these vehicles are unauthorised, including many contractors vehicles from the Craneford Depot. This is inevitable since the barrier is operated by a numerical keypad and the code is easily obtainable by anyone who wants to use the exit. At the present time (7th November 2013) the barrier is permanently open and traffic is passing through in both directions.</p> <p>The Site Allocations Plan relating to proposals relating to the Harlequins states “Any further development on this site or other sites served by Langhorn Drive is likely to require the provision of a signalised junction between Langhorn Drive and the A316, subject to TfL approval”</p> <p>As a resident of Heathfield South, I object to the wording of this paragraph. No further development should take place on the Stoop site unless and until it is certain that a signalised junction is to be provided between Langhorn Drive and the A316. When Langhorn Drive was constructed, residents in the surrounding area were led to believe that traffic to and from the Stoop and Craneford Depot would no longer pass through the residential area. The concession granted to members of the Health Club has led to a considerable increase in local traffic as explained above.</p> <p>When such a junction is installed, there will be no further case for the concession and the barrier between the Stoop and Craneford Way should be permanently closed. Craneford Way will then revert to being a cul de sac as indicated by the sign at its junction with Egerton Road.</p>
123	Francis McInerney	<p>3.4.1 The stated facts in support of the proposal for this site do not show a need or justification for an hotel in this area and do not bring into consideration the additional vehicle traffic that would be generated.</p> <p>3.4.2 Vehicular access from Craneford Way must be avoided.</p>
99	Rob Gray, FORCE	<p>Increased capacity of the ground and associated leisure and/or hotel use will each impact upon the transport network and create additional associated disturbance to the local area. How would this be mitigated?</p> <p>There has been an ongoing struggle to ensure that the vehicle barrier between Craneford Way and Langhorn Drive remains closed to all but the users of the health club (as per the requirements of planning conditions for two previous planning consents). In practice this has not been successful for any extended period of time due to either breakage/sabotage or the access code becoming more widely known. When Craneford Way can be accessed to and from Langhorn Drive it becomes a rat run for access to Twickenham and the A316 as well as by users of the Council depot. It is also a significant safety risk for students accessing the playing fields and young children using the playground area. We propose that any proposal to further develop the Stoop Site includes an agreement to close and bar this access route to all but emergency vehicles.</p>
81	Gareth Harper	<p>I find the consultation document to be drafted at such a level of generality as to preclude detailed comments in response. But I have a direct interest in two of the sites identified for more intensive use - Harlequins Rugby Ground (TW8) and the Council Depot (TW9) - as my home backs onto the Duke of Northumberland River more or less opposite the boundary line between the two sites.</p> <p>I have lived at my present address since 1993 and in the subsequent twenty-year period I have seen a number of intensifications in the use of both sites. As a consequence, the adverse impact of both sites on Rosecroft Gardens - in particular the levels of noise - are cumulatively much worse than they were in 1993, notwithstanding the assurances to the contrary that were given at the planning permission stage for a series of incremental intensifications in the use of both sites.</p> <p>My concern is that a further series of incremental intensifications in the use of both sites will result in further long-term degradation</p>

Ref. no.	Name/Organisation	Comment
		to the local environment. There appears to be a lacuna in the planning system in that planning consents do not take into account the impact of incremental developments, each of which might be acceptable in isolation, but which become unacceptable in cumulation. Following this consultation, I intend to ask my MP what provisions are in place in the planning system to guard against incremental environmental degradation; and whether those provisions are deemed to be adequate.

Detailed comments – where respondent gave no indication if supporting or objecting:

Ref. no.	Name/Organisation	Comment
80	David Rose	Access to the existing and proposed developments to be via a fully signalled junction only on to the A316. There should be no access for construction traffic or finished developments through the existing residential Heatham Area roads.
46	Richard Parish for English Heritage	We note the site borders the Rosecroft Conservation Area, comprising a formal arrangement of bungalow's separated from the identified site by the Duke of Northumberland's River. We would therefore recommend that a requirement for any further development on the site would need to preserve the setting and character and appearance of the adjacent conservation area.
170	Sarah Considine, Greater London Authority	TfL recognises that changes may be required to the A316 Chertsey Road, part of the Transport for London Road Network). Any changes to, or additional signalised junctions onto, the A316 must be fully justified having regard to the operation of the wider network, so as to ensure conformity with London Plan Policy 6.11.

TW 9 Central Depot, Langhorn Way, Twickenham

Detailed comments – where respondent supporting it:

Ref. no.	Name/Organisation	Comment
99	Rob Gray, FORCE	We welcome, albeit belatedly, the commitment to widening the pathway along the DNR. The path is very narrow in this area and there is a wide strip of land outside of the inner fence to the depot that could have been re-allocated for public use many years ago when FORCE first raised this possibility. We also welcome the commitment to improving the condition of the boundary with Craneford West Field. This boundary has also been neglected by the council over the last ten years and its appearance and condition are not satisfactory. Note that neither of these improvements would require development on the site, or significant amounts of funding, in order to be delivered. FORCE has also proposed, over a number of years, that the southern boundary of the depot site, which at present creates a narrow, unattractive and somewhat dangerous combined footpath and cycle way, and a pinch point for this part of the Crane valley, is set back so as to widen the route. This boundary used to be the site of a fine avenue of chestnut trees, of which the southern side (and a few northern examples) remain. Any development at this site would provide an opportunity to restore this avenue and provide a safe and attractive route along this part of the Crane Valley walk. We welcome the commitment to retaining the pump house. This is a fine period building but is in a poor state of repair. We believe there is the potential for beneficial public use of this building as part of any re-development of this site.

Detailed comments – where respondent objecting to it:

Ref. no.	Name/Organisation	Comment
123	Francis McInerney	3.4.3 The stated facts in support of the proposal for this site do not show a need or justification for sports facilities or other ancillary education facilities on this site. 3.4.4 Vehicular access from Craneford Way must be avoided. Any development must take full consideration of the Crane Valley Planning Guidelines (2005).
150	Douglas Craik	See comments by Douglas Craik to TW8
80	David Rose	Given the proposed scale of housing / leisure developments in the immediate area, and the existing nature of the Depot operations, further housing / leisure would not be appropriate. It should be retained for limited commercial / light industrial development.
81	Gareth Harper	I find the consultation document to be drafted at such a level of generality as to preclude detailed comments in response. But I have a direct interest in two of the sites identified for more intensive use - Harlequins Rugby Ground (TW8) and the Council Depot (TW9) - as my home backs onto the Duke of Northumberland River more or less opposite the boundary line between the two sites. I have lived at my present address since 1993 and in the subsequent twenty-year period I have seen a number of intensifications in the use of both sites. As a consequence, the adverse impact of both sites on Rosecroft Gardens - in particular the levels of noise - are cumulatively much worse than they were in 1993, notwithstanding the assurances to the contrary that were given at the planning permission stage for a series of incremental intensifications in the use of both sites. My concern is that a further series of incremental intensifications in the use of both sites will result in further long-term degradation to the local environment. There appears to be a lacuna in the planning system in that planning consents do not take into account the impact of incremental developments, each of which might be acceptable in isolation, but which become unacceptable in cumulation. Following this consultation, I intend to ask my MP what provisions are in place in the planning system to guard against incremental environmental degradation; and whether those provisions are deemed to be adequate.

Detailed comments – where respondent gave no indication if supporting or objecting:

Ref. no.	Name/Organisation	Comment
80	David Rose	Access to the existing and proposed developments to be via a fully signalled junction only on to the A316. There should be no access for construction traffic or finished developments through the existing residential Heatham Area roads.
46	Richard Parish for English Heritage	See above – this site lies south of TW8 and also adjacent to the Rosecroft Conservation Area. We would recommend that a similar reference is included drawing attention to the need to consider the setting of the conservation areas in any proposals.

TW 10 Richmond upon Thames College, Egerton Road, Twickenham

Detailed comments – where respondent supporting it:

Ref. no.	Name/Organisation	Comment
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Ref. no.	Name/Organisation	Comment
170	Sarah Considine, Greater London Authority	<p>The Council's proposed strategy to redevelop the Teddington Studios site for residential use, and to off-set the loss of employment floorspace at that site with the provision of office floorspace as part of the redevelopment of the Richmond upon Thames College site, does not raise strategic concern in principle, subject to appropriately securing the site strategy through the planning application process. Furthermore, the Council's aspiration to retain the existing office occupier at the Teddington site within the borough, is supported. However, there are concerns that the explicit requirement for headquarter-type office floorspace within the document will lead to applicants attempting to seek excessive development costs, to the detriment of affordable housing provision. This raises strategic concern, and would not be supported. As such, the document should refer only to the requirement for replacement office floorspace provision, and not dictate a preference for the style or type of such provision. For the avoidance of doubt, the cross-subsidisation of office floorspace by housing, to the detriment of affordable housing provision, would not be supported.</p> <p>Furthermore, in accordance with London Plan Policy 3.12, explicit reference should be made to the need to ensure that any residential development at the Teddington Studios site will be required to include on-site affordable housing. GLA officers are aware through pre-planning application discussions that there has been a suggestion by the applicant that off-site provision of affordable housing would be proposed. As has been made clear to the applicant, off-site provision of affordable housing would not be acceptable. The document, as currently drafted, is potentially unclear in the Council's expected approach to affordable housing on both sites, and for clarity each site allocation designation should include a specific requirement for on-site affordable housing. Finally, given the nature and scale of the existing studio space, its loss does not raise strategic concern.</p> <p>In addition, TfL looks forward to working with the council to explore the access proposals associated with the development of the college site.</p>

Detailed comments – where respondent objecting to it:

Ref. no.	Name/Organisation	Comment
150	Douglas Craik	See comments by Douglas Craik to TW8
123	Francis McInerney	<p>3.4.5 (in relation to TW10) The stated facts in support of the proposal for this site do not refer to any quantified demand for secondary school places in the borough and do not identify a need or justification for (private sector) offices in this area or on the existing playing fields belonging to the College.</p> <p>The justification makes no reference to the location of (very significant) commercial offices next to a residential area and the Site Allocation Plan discloses no change in circumstances that would justify placing commercial offices on the public land of Richmond Upon Thames College.</p> <p>3.4.6 Upgrading of the College's Craneford Way playing field should include constraints in consideration of adverse impacts on residents living along Craneford Way and nearby. Any such upgrading must also consider the Crane Valley Planning Guidelines (2005).</p> <p>Any vehicular and non-vehicular traffic to/from this site through Heatham Estate must kept to the present minimum.</p>
124	Clare Novakovik	3.4.5 The stated facts in support of the proposal for this site do not refer to any quantified demand for secondary school places in the borough and do not identify a need or justification for (private sector) offices in this area or on the existing playing fields belonging to the College.

Ref. no.	Name/Organisation	Comment
		<p>The justification makes no reference to the location of (very significant) commercial offices next to a residential area and the Site Allocation Plan discloses no change in circumstances that would justify placing commercial offices on the public land of Richmond Upon Thames College.</p> <p>3.4.6 Upgrading of the College's Craneford Way playing field should include constraints in consideration of adverse impacts on residents living along Craneford Way and nearby. Any such upgrading must also consider the Crane Valley Planning Guidelines (2005).</p> <p>Any vehicular and non-vehicular traffic to/from this site through Heatham Estate must kept to the present minimum.</p>
133	Dale Greetham, Sport England	<p>Sport England objects to the potential loss of existing sports facility provision at the below sites. These site policies should specifically state that the existing sports facility provision will be protected:</p> <p><u>Objection</u></p> <p>Protection of playing fields for sport</p> <p>Planning Policy Objective 6 aims to ensure that there is no further reduction in the supply of conveniently located, quality playing fields for sport to satisfy current and likely future demand. Sport England will normally oppose development that would lead to the loss of, or prejudice the use of, all or part of a playing field, without meeting at least one of the specific exception criteria identified in Sport England's policy 'A Sporting Future for the Playing Fields of England' (1997), a copy of which can be downloaded from our website at http://www.sportengland.org/facilities-planning/planning-for-sport/development-management/planning-applications/playing-field-land/.</p> <p>The above mentioned sites would therefore fail the tests of soundness.</p>
154	Noel Reeve	<p>Regarding 3.4.6 and the statement on "Access to the trunk and local road network will be addressed at the development control stage".</p> <p>It should be stated that any development of the college site to add commercial office development alongside its current use for educational purposes, ough to fully address vehicular access in order that no increase in through traffic is experienced by the Heathan estate roads such as Court Way, Craneford Way, and Heathfield North and South. This is a potentially major development which could impact the local environs considerably. It is a notable contrast to paragrah 3.4.4 where that explicitly states that for increase in use of the Langhorn Way depot site, vehicular access from Craneford Way should be minimised. Why is Heatham estate not being given the same explicit protection with respect to the proposed college site development?</p>
99	Rob Gray, FORCE	<p>There have been a number of development proposals for this site over the last ten years that have not come to fruition – and yet this “plan” appears the vaguest and most optimistic of them all. It is difficult to envisage how the existing site could be developed in such a way as to provide a new college, a secondary school, a special needs school, an HQ building (for 1100 staff according to a recent council press release) as well as providing enabling development (including affordable housing) and open space. The idea that this could be proposed as a change to the Local Development Framework without any supporting evidence and information regarding layouts and implications for the existing residents and local open space is scarcely credible.</p> <p>We are not opposed in principle to the re-development of the college site – and we fully appreciate the College's desire for a new building that is more “fit for purpose”. However, there are many new and potentially conflicting uses proposed in this particular Site Allocation Proposal, in addition to all the existing uses and aspirations for the area.</p> <p>The most obvious concern is the likely impact in practice on any remaining open space – and how the uses for three different categories of student will conflict both with each other and the general public. It is hard to imagine, regardless of any statements in principle at this stage, how the proposal for full public use of open spaces would continue in the long term.</p> <p>FORCE has been working on the open spaces of Craneford West and East Field for ten years and we know they are very well</p>

Ref. no.	Name/Organisation	Comment
		used by local community, including by people from the south side of the railway and the north side of A316. Any loss of public open space from these fields, or “sharing” of this space with new schools on the sites, would be opposed by FORCE.
41	Peter Baker	Having read through the proposals for the development of the College at Egerton Road, I strongly object to the plan. My objections are based on the size of the development, the impact on the residential streets leading to the proposed site and the irresponsible and ill advised failing to plan the access to the site from the outset and not the quoted 'Access to the trunk and local road network will be addressed at the development control stage'. A few years ago, when the access road to the Craneford Way depot was being proposed, the then Department of Transport objected traffic control onto this main trunk road and any additional access points. Unless there has been a major change in the original objections raised at the time about for building an access road off the A316 then I would suggest that the new request for access would also be unsuccessful. As a result of the above Egerton road would be the only ingress and egress to the site off the A316 and would therefore there would be a huge increase in Site development traffic through Court Way and the local surrounding residential roads. This will cause traffic, environmental and road safety problems, especially with the high number of students walking on the pavements and the middle of the roads through this area .
80	David Rose	The proposal states “...a new College...Headquarters Offices...within a comprehensive scheme.” The clear implication of the wording is that the offices are to be the headquarters for the College Administration. There is no specific reference to an inappropriate and overbearing commercial development by a large media company, or other commercial organisations. Such a proposal, as reported in local media and quoted by Haymarket Media Ltd, RuTC College and the Council was not included in the original ongoing legal consultation and should be removed from the consultation process.

Detailed comments – where respondent gave no indication if supporting or objecting:

Ref. no.	Name/Organisation	Comment
80	David Rose	Access to the existing and proposed developments to be via a fully signalled junction only on to the A316. There should be no access for construction traffic or finished developments through the existing residential Heatham Area roads.
25	Clare Longstaff	Whilst we think a redevelopment to the site, if carried out with consideration for the neighbour hood, could be a positive thing , there are areas of serious concern. Local children use the playing fields on a VERY regular basis. Will there still be an area to play on? Children need play areas to stay fit and healthy as I'm sure you agree. Court Way is already a thoroughfare for college students and rugby fans, at times to the point of great difficulty for locals to walk or drive up our own street. Access to the site HAS to be agreed before the development stage. Is the proposed Crane River walk still going ahead? What other options will there be to access the site? Please consider the local residents before progressing this to our detriment. A new development should be a positive thing for everybody!
98	Peter Collins	As a long time resident of Court Way, I would like to ask the Council to consider the access required for the above development and the impact this will have on local residents. Court Way is already overrun by the numbers of students who make their way to and from the College each day; the road is often almost unusable by residents. Unless sufficient and new access is created this will further blight the area and severely impair the use of any facilities. Postponing or avoiding the planning of access to local

Ref. no.	Name/Organisation	Comment
		roads until the development control stage is not a viable option. Access is well known to be a very significant issue that needs to be addressed at the start and incorporated into each stage of the process. I would urge the Council to consider access to any development from the start and involve local residents in the process. Unless access and reduction rather than further saturation of local roads can be achieved the proposal should be rejected.

TW 11 West Twickenham Cluster, Twickenham
Detailed comments – where respondent supporting it:

Ref. no.	Name/Organisation	Comment
13	Andy Taylor	<p>Relating to the site allocations plan paragraph 3.4.7 TW11 West Twickenham cluster:</p> <p>This is a welcome proposal and would be a dramatic improvement compared to the current use of the site (mainly an industrial scale bakery). This area is a key residential area as it is very often an access point to Twickenham - the 'two up two down' terraced houses in this area attract many first time buyers / young families who may then settle permanently in Twickenham and contribute considerably to the local economy and community. The site in question contains the Greggs bakery which is now outdated. Many decades ago when this area was on the edge of Twickenham and this bakery was a small scale operation it could sit reasonably within its local context - now the balance has shifted. In recent years the bakery's operation has expanded (it now supplies a vast swathe of the South East not just a few local outlets) and it has outgrown its site. The lorries which come and go from the site are too big for the local roads and too frequent, loud and potentially dangerous for the local residents. Meanwhile the residential emphasis of this area, and the number of young families settling in it ,have increased. So, this area needs to be family friendly, which is why the proposal to develop the site to provide more housing and a new primary school is so welcome. Business and employment in this area are also welcome but it must be business that can co-habit successfully with a residential family area - there must be reasonable hours of operation, and properly thought out access with no heavy goods vehicles. I believe that if this site is redeveloped rightly, it will give a boost to the west end of Heath Rd (recently a problem area for shut down shops). The removal of the bakery lorries would ease local traffic issues, the streetscapes and local approaches to Heath Rd could be improved and the addition of new residents in increased housing would provide new footfall. Plus new small scale start-ups may create new shops (e.g. existing small local business Heavenly Dish has its base in Colne Rd but recently opened up an outlet on Heath Rd). The key in this redevelopment is that the industrial bakery must go - it is holding back this part of Twickenham. There is no mention in the proposal of green space. This is an intensely residential area and the redevelopment of this site would present a great opportunity to create new some green space to allow the area to 'breathe', possibly incorporating a part of the River Crane which has been previously cut off. Perhaps any new Primary School could have playing fields open to the public? Also, a kids playground on this site would be welcome. It is also key that any residential development on this site is sympathetic to the character houses in the surrounding streets and that proper provision is made for parking. Thought also must be given to how the primary school would be accessed - the emphasis must be that this would be local school for local families to walk to - not another creation of a traffic logjam.</p>
94	R G Young, C. G. & W. Young Ltd	<p>With reference to the above site proposals, I should like to voice my opinion of Fifty years of experience of the area currently owned by "Greggs" and the former "Sunblest" bakery. I speak with some authority on this matter as my uncle was a previous owner of "Crane Mews", we occupied a site in Colne Road for 70 years and are currently occupying our own premises directly opposite the bakery in Edwin Road which we purchased some 20 years ago.</p> <p>Firstly I should point out that the Bakery wished to move many years agog due to the unsuitability of the site compared to modern</p>

Ref. no.	Name/Organisation	Comment
		<p>requirements. They even went as far as to purchase another property before finding out that domestic housing would not be allowed on the existing site as it was Council policy to “keep industry in Twickenham”.</p> <p>In consequence we have been subject to more and larger lorries working two shifts daily, causing havoc in the area. This is now several times worse than twenty years ago due to the following factors:-</p> <ol style="list-style-type: none"> 1. the Council parking zone ends at the Colne Road Bridge, hence both sides of the streets around the proposed development are blocked with cars effectively making the lorry route to the bakery one-way. 2. The adjoining houses now have nearly all had loft conversions and their owners have two cars or more. 3. The Council has both constructed/enforced weight and width restrictions causing regular traffic jams as the only way in and out is via Edwin Road. 4. The bakery has become more of a “Distribution Warehouse” for its hundreds of shops rather than bread production. This involves vastly more incoming vehicles i.e. Coca Cola, Walkers Crisps, Epicure Sauces, Mineral Water Supplies etc etc. <p>Without wishing to expand too much, I enclose a couple of photos to let you see the problems and consequently give my favourable and utmost support to regenerate the area in the way proposed with the exception of a primary school as for the above reasons i.e. you will simply exchange Bakery lorries for Parents/Teachers cars in an area that is unsuitable to this continuous flow of traffic unless you alter the current parking arrangements.</p> <p>Finally I should like to add that the proposed plan would also benefit everyone in the area and bring more wealth and spending into the town which currently the Bakery does very little.</p> <p>It is ironically in hindsight, a return to a better Twickenham that existed prior to previous Council decisions to force small industry out of the town thirty/forty years ago!</p>

Detailed comments – where respondent objecting to it:

Ref. no.	Name/Organisation	Comment
135	Alison McKay, Colliers International on behalf of Greggs PLC	<p>Colliers International, on behalf of our client Greggs PLC, are instructed to comment on the Site Allocations Plan Pre-Publication document. We wish to make representations specifically in relation to identified ‘Proposed Site TW 11 West Twickenham cluster, Twickenham’ in the consultation document.</p> <p>Our client’s ownership comprises a significant proportion of proposed allocation site TW11, comprising approximately 1.05 ha, as shown in the accompanying Location Plan. A bakery has operated from this site for a number of decades and the firm’s operations have changed to an extent that the buildings are no longer meeting its operational needs. The site is also constrained by the local highway network with poor access to major trunk roads. Due to the poor access to the site which makes it unsuitable for modern commercial vehicles and the close proximity to high density residential development, which currently causes conflict with a 24 hour industrial operation, the redevelopment of the site for use as a new bakery is not viable. It is expected that the site will become available within the next 5 years.</p> <p>Our client fully supports the allocation of their site and the wider area as a residential led mixed use development. This will help deliver the objectives of the Core Strategy, which seeks to deliver approximately 700-1100 housing units to the Twickenham area, as set out in CS 14. The Sustainability Appraisal Progress Report clearly emphasises the advantages for redeveloping the site which meets key objectives including the landscape, townscape and housing; highlighting that the site is in a very sustainable location with access to established services and nearby employment.</p> <p>Whilst a large proportion of the designated area is within the ownership of our client it is our view that, given the multiple ownerships for the site and the evident access and amenity constraints, the designated area should be brought forward by way of</p>

Ref. no.	Name/Organisation	Comment
		<p>a Development Brief. It is felt that this is particularly important given the non-residential use of the site is for 'start up and small scale hybrid business space and/or primary school' and a Development Brief would allow for a masterplanned approach to take into consideration the site-specific issues including the ability to recognise the need, transport and urban design.</p> <p>Our client believes that such an approach will both minimise uncertainty and improve efficiency whereby improving the overall quality of development. Failure to consider this approach is likely to lead to piecemeal development which could negatively impact on the ability to utilise the deliverability of the full extent of the site.</p> <p>The reference in the policy text to a 'Proposed Designation as key employment site' is misguided as the site is not suitable for continued employment purposes of a scale to constitute a key employment site. The most suitable use for the site is for a residential led mixed use scheme to include start up and small scale hybrid business space and/or primary school as highlighted in the remaining policy text. The area to be used for employment and/or primary school would more easily be determined through way of a Development Brief.</p> <p>In order to provide a deliverable allocation, our client considers the policy wording of the allocation text should be changed to the following: TW 11 West Twickenham cluster, Twickenham Proposal Residential led mixed use to include start up and small scale hybrid business space and/or primary school. Any proposed development will be delivered in line with a Development Brief which will be prepared for the site.</p>
99	Rob Gray, FORCE	<p>This proposal does not mention its location within the Crane valley and its extended boundary with the river itself. FORCE would expect that any re-development of this site would acknowledge its location adjacent to the River Crane and would include benefits to the river corridor.</p> <p>This proposal includes the potential for an educational use. There is no appropriate open space available for this use. FORCE would oppose any proposal to use Kneller Gardens for educational open space associated with this development.</p>
162	James Tovey	<p>As a local resident living on Gould Road I have 2 key concerns with regards to these proposals: 1) Access. The residential area surrounding this development already gets congested with traffic at peak times and the roads only allow for single file traffic. Neither of the existing routes i) via Edwin Road (as is currently used by the delivery vehicles; ii) via Andover & Gould Road, have the capacity to take a significant increase in traffic as such a proposed development would require. In addition, particularly as a parent, I would not want to see an increase in traffic, where cars already travel at excessive speed, for the safety of children who may be getting into cars, crossing the road, etc. I therefore propose an alternative access route would need to be developed. 2) Parking. There is already inadequate parking & control of it for local residents in the surrounding area, in particular during the day. Any proposed development would need to ensure there was a realistic amount of parking to meet the requirements of the new site to ensure no overspill into an already congested area.</p>

Detailed comments – where respondent gave no indication if supporting or objecting:

Ref. no.	Name/Organisation	Comment
11	Richard Knight	<p>The Council should be aware that in this particularly densely-populated area, the road network - and parking - is already under considerable pressure. We were promised when Crane Mews was developed that the site would provide adequate parking for its users. That did not happen, causing real problems to local families who need to park near their homes. It would be unfair and short-sighted if the problem were to be made worse. I therefore hope any further development will be seen as an opportunity to reduce, rather than increase, the impact of traffic on the neighbourhood.</p>

E TW 12 159, Heath Road and Heathland Industrial Estate, Twickenham

Detailed comments – where respondent objecting to it:

Ref. no.	Name/Organisation	Comment
131	Philip Allin, Boyer Planning on behalf of Axiom Land	<p>The emerging Site Allocations Plan identifies Twickenham House, 159 Heath Road as being within the Heathland Industrial Estate which is proposed to be designated as a Key Employment site. We would object to the inclusion of this property within this proposed allocation for the following reasons:</p> <ol style="list-style-type: none"> 1. As the Council will be aware, a planning application for the mixed use redevelopment of this site has been submitted by Axiom Land. This application has been the subject of extensive pre-application discussions with Planning Officers and is supported by robust evidence in order to justify the loss of employment floorspace in this location as required by Policy DMEM2 of the Development Management Plan. In addition, a second application reducing the amount of commercial floorspace and increasing the amount of affordable housing, which has been discussed with the Council's Planning Officer, will be submitted shortly. 2. The NPPF (paragraph 22) 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 that purpose. The NPPF also places an emphasis on local authorities to demonstrate strong economic reasons in instances where it is considered that a change of use of employment sites would not be considered acceptable (paragraph 51). As a result the Council have published an Assessment of Employment Sites and Premises (March 2013) which provides an up to date picture of the Council's employment sites and premises needs and provision, by area and sector, in order to support policy recommendations on the allocation, protection or release of employment sites. The study identifies that much of the office stock across the borough is classed as being in good condition and there is very little dereliction or neglect (paragraph 4.52). Twickenham itself is identified by the study as a secondary centre, historically seen as an overspill centre for Richmond accommodating those unwilling to pay Richmond prices or are unable to find sufficient space, but is somewhat struggling when compared to the borough as a whole. The physical structure of its office market, characterised by a small number of out of scale 1970s and 1980s buildings gives the authors of the study some concern how tenable the market is which is supported by the high vacancy levels (paragraphs 6.32-.34). In summarising the current position in Twickenham, the study considers that it is at something of a crossroads and decisive action would help protect its position as an employment centre, whilst accepting that the credit crunch accelerated the obsolescence of much of its stock. The study considers that much of the vacant space is not fit for purpose for today's business needs and comprises secondary office stock which is at the very least due for refurbishment. Outside of the key office centre of Richmond Town Centre, the view of the authors of the report is that it is unlikely that sufficient rent or yield movement will occur to support this or any major redevelopment. This, coupled with the evidence of changing working practices and occupational densities in offices, suggests that current low levels of demand are not simply a response to the prolonged recession, but part of a structural change in demand (paragraph 9.5). In conclusion, the study recommends that rather than the blanket approach taken to retain all employment land in employment uses, an area based approach should be employed for each of the diverse local property markets. The study recognises that Twickenham is in need of investment with a large share of its office stock at the end of its useful life and that there is good scope for provision of hybrid space (paragraph 9.8). 3. Twickenham House, the lawful use of which is for office space (B1), is allocated together with Heathland Industrial Estate which is made up of a number of industrial units (B2) providing a different employment function to that of Twickenham House. It has

Ref. no.	Name/Organisation	Comment
		<p>been demonstrated through the evidence that that accompanies the recent planning application that Twickenham House does not meet the requirements of the modern office occupiers with no interest in this space despite extensive marketing. We consider that the exclusion of Twickenham House, therefore, would not affect the long term protection of the industrial units which make up the bulk of the proposed employment allocation.</p> <p>4. Notwithstanding the above point, the proposed site allocations plan states that the existing planning policies in respect to the protection of employment sites will continue to be applied (para 2.4.5). Therefore it is not immediately clear what the justification is for allocating this employment land especially as the proposed allocation policy does not provide any further clarity. As it stands it would appear that the proposed allocation is simply a duplication of existing policy.</p> <p>In summary and in line of the above points, we do not consider that there is justification to support the inclusion of Twickenham House within the proposed allocation and that as a minimum the area shown annotated on the attached plan should be excluded from any future allocation.</p>

TW 13 Mereway Day Centre, Mereway Road, Twickenham
Detailed comments – where respondent supporting it:

Ref. no.	Name/Organisation	Comment
75	Anna Hemming	<p>I have been reading the Site Allocation Plan with interest and notice there is an application to change the use of the Mereway Day centre.</p> <p>My husband and I live on Mereway Road and are excited at the prospect that the Day Centre will once more be a useable space. We are concerned there is already insufficient parking spaces for the residents on the street, especially as we have lost 14 more spaces following the recent consultations. Clearly Twickenham is in further need of private family homes and should residential use be granted we would like to see this small piece of land developed into an area of private family homes with their own off street parking and garaging in keeping with the surrounding streets.</p> <p>Other proposals for education (school or nursery) are also much needed in the surrounding area and as long as the access was adequate we would support this use as well. We would be interested to understand how the council will organise access for an educational establishment given the road is already full and narrow. We would not relish the proposal that additional parking would be removed from the street as there is already a shortage which causes additional issues.</p> <p>We understand there is further site allocation planning due at Gregs Bakery which include a primary school. I am sure this can be incorporated into the overall plan as I am sure the Mereway Day Centre would only suit a couple of class rooms!</p> <p>The nature of the build needs to fit the surrounding area as a single storey building. We do not want to have our lovely nature reserve overlooked by a residential or educational structure.</p>

Detailed comments – where respondent objecting to it:

Ref. no.	Name/Organisation	Comment
125	Cllr Piers Allen	This is a sensitive site, on the edge of MOL and Mereway Nature Reserve and in the middle of a residential area with a low PTAL rating, where residents regularly report problems in parking in the road.

Ref. no.	Name/Organisation	Comment
		<p>The sentiment of residents (as I ascertain it) is that community/office use might be welcomed with any residual land made available to add to the Mereway Nature Reserve managed by FORCE, but that any use that would exacerbate the parking problems would be regarded as harming the residential amenity of residents and this would be likely to preclude housing (unless an enforceable car-free development) or educational use (unless all parking was on site and measures were taken to have no parents park in the area).</p> <p>There are other opportunities for employment use in the ward (including St Georges, Twickenham Green and the Greggs Bakery site) such that the status quo where the building was used low stress community use and the residual land released to join the Mereway Nature Reserve might be the best option for the site.</p> <p>The merits of allowing this site to enhance open space should not be lost.</p>
151	Marcus Simmons	<p>The construction of residential housing on the site of Mereway Day Centre would be a disaster for Mereway Road. The road is already cluttered, parking is often a problems and this is exacerbated significantly by rugby traffic, both for the RFU stadium and Harlequins. The soon to come yellow lines right by the Mereway Day Centre will also worsen the situation significantly, although this was an acceptable compromise bearing in mind the difficulty of Council trucks rounding the corner by the Day Centre on their way to the recycling depot. Mereway Road is currently right at the limit of what it can contain regarding families and general busyness of the road and the infrastructure just could not contain any more residential housing.</p> <p>It would be preferable for the Day Centre to be used for local education. We are particularly well served in the area by primary schools (Trafalgar and Archdeacon)but there is a definite need for more pre-school facilities with so many young families in the area. This would cause minimal disruption to day to day life on Mereway Road.</p> <p>Even better would be the Day Centre re-opened to those with need of help to cope with mental illness and recovery from it.</p>
158	Susan Woodbridge	<p>Paragraph 3.4.8</p> <p>The site has been earmarked in the past for residential or educational use. As a resident of Mereway Road for many years I have obviously see many changes, most markedly in the number of vehicles and the shortage of parking. We have fought against a CPZ as the problem is not parking during the daytime but at nights when all residents are home. You are going to give planning permission to one of the uses whatever residents protestations are. If there is adequate parking provided in a residential solution this is a good solution, although affordable housing does not have the same parking ratios and could cause problems. Sheltered or retirement homes may be a good alternative as the number of cars used by residents may be lower but unless you have an interested developer this cannot be guaranteed. Educational: the site is not large enough for secondary education which would mean more pupils would walk and therefore if nursery or primary use is granted this would generate far too much traffic for the size of our road.</p> <p>I feel quite powerless to influence your decision other than to say please treat our area with an objective and sympathetic view and also consider the residents who live at the end of the old allotment area in the house and cottages.</p>
159	Anthony Jenni	<p>Justification Section 3.4.8</p> <p>I am long term (over 15 years) resident of Mereway Road that has seen the local Council approve too much infill housing without adequate parking I would strongly object to the use of the Mereway Day centre site for either housing or education / school building. Both would create excessive pressure on the surrounding roads and parking for local residents. This has been a constant problem over the last few years. The problem has been caused by past Councils poor house building planning management -i.e too much infill housing creating too much congestion exacerbated by inadequate parking facilities for any new infill housing. So careful thought needs to be given to the use of the site so as not to further exacerbate local parking & traffic congestion The site could either continue to be used as some kind of a day centre (with its own parking) e.g for a local charity like Mind , or be handed over to FORCE (Friends of the River Crane Environment) to be used as an office / exhibition centre for the</p>

Ref. no.	Name/Organisation	Comment
		Crane Valley Park, perhaps with some small office sites like Crane Mews. An element of the site should be used to create some extra public parking spaces for local residents to repay them for the aggravated parking difficulties that have been created by past Council infill housing decisions.
73	Kelly Hill	<p>I live at number 56 Mereway Rd and so this site is very close to my property. I appreciate this site needs to be utilised for something and would prefer a school or nursery rather than housing.</p> <p>I would urge you to take into account the following things:</p> <ol style="list-style-type: none"> 1. Parking is incredibly difficult already on this road and a very high number of families with young children live here which makes parking far away from your property very inconvenient. There are times when I have had to park several streets away and walk my 2 young children back to our house in the dark etc This will only be made worse if further housing is built there. 2. If the day centre can be converted into a school or nursery using the existing low level building this will greatly minimise disruptive building work and avoid my house and others being overlooked. 3. The road that runs off Mereway Rd down to the day centre is used by a lot of children going to Kneller Gardens via the White bridge - the onset of building work with trucks, lorries etc could be very dangerous as children have no pavement to walk on and are forced to walk on the road to access the bridge to the park. <p>Many thanks for your help and please do not hesitate to contact me on 07718 521300 should you require any further info or input.</p>
74	Daniella Folkes	<p>I am contacting you in relation to the planned building proposal for the old Mereway Rd Day Centre.</p> <p>I live at number 67 Mereway Rd and so this site directly backs on to my property. I appreciate this site needs to be utilised for something and would prefer a school or nursery rather than housing.</p> <p>I would urge you to take into account the following things:</p> <ol style="list-style-type: none"> 1. Parking is incredibly difficult already on this road and a very high number of families with young children live here which makes parking far away from your property very inconvenient. There are times when I have had to park several streets away and walk my 2 young children back to our house in the dark etc This will only be made worse if further housing is built there. 2. Any 2 storey building will overlook my property - if the day centre can be converted into a school or nursery using the existing low level building this will greatly minimise disruptive building work and avoid my house and others being overlooked. 3. The road that runs off Mereway Rd down to the day centre is used by a lot of children going to Kneller Gardens via the White bridge - the onset of building work with trucks,lorries etc could be very dangerous as children have no pavement to walk on and are forced to walk on the road to access the bridge to the park.
76	N. Frinneby Wake	<p>I am contacting you in relation to the planned building proposal for the old Mereway Rd Day Centre.</p> <p>I live at number 72 Mereway Rd and would be directly impacted by any potential proposed build or development. I appreciate this site needs to be utilised for something and would prefer a school or nursery rather than housing due to the severe space constraints the residents like myself already put up with.</p> <p>Our main concerns are:</p> <ol style="list-style-type: none"> 1. Parking is incredibly difficult already on this road and there is a very high number of families with young children living in this road already which makes parking far away from your property very inconvenient and frustrating. It is already very annoying to have to leave your shopping/bags etc in your car, as you have been forced to park several streets away, so that you can ensure that your children get home safely only to have to return later when someone else may be at home so that you can retrieve your belongings. This will only be made worse if further housing is built there as this would bring an increased level of traffic and parking issues. 2. If the day centre can be converted into a school or nursery using the existing low level building this will greatly minimise disruptive building work and would provide for more education spaces which appear are greatly in need - for example there is no

Ref. no.	Name/Organisation	Comment
		<p>possibility of getting my 2 yr old daughter into Asquith Day Nursery (our local nursery) as it is full and we have been told to not even bother putting name down on waiting list.</p> <p>3. The road that runs off Mereway Rd down to the day centre is used by a lot of children going to Kneller Gardens via the White bridge, and to the nature reserve- the onset of building work with trucks,lorries etc could be very dangerous right next to a park and nature reserve.</p>
79	Michael Castleton	<p>I note that the consultation refers to 'residential, including affordable or education', and I would like to say that I would strongly object to a residential development. During the construction project, there would be a long term impact on the street, and the daily lorries and extra traffic would be a concern, considering the large number of children who not only live in Mereway Road, but use it en route to the playground in Kneller Gardens. Any large scale construction or increased traffic poses a risk to their safety. In addition, the presence of new homes on the site of the old day centre would automatically put extra stress on the already dire parking situation in the street. Because of the council's frankly ludicrous policy of insisting on a maximum number of parking spaces to be provided by a potential developer, and not a minimum, the sane and sensible option, residential use of the site would make unreasonable demands on the already over stretched parking provision in Mereway Road, which is already due to be made worse with the imposition of extra yellow lines in the near future. In addition, Mereway Road, despite its parking shortages, feels safe for kids because although it provides access to a couple of cottages, it is effectively a cul-de-sac. Residential development of the day centre would turn it into a thoroughfare, with significantly increased traffic, and risk to our many young families and children from other streets going to and from the playground facilities in Kneller Gardens. Cars driving to the end of Mereway Road are almost always travelling slowly at present, because they are usually looking for that illusive parking space. As soon as you cars travelling through Mereway Road, to a destination beyond, the speed will increase. It is a daily battle to stop keep the pre-school kids safe when crossing the street anyway, as they cannot be seen behind/between parked cars. I fear that the increased traffic and velocity may risk serious injury, if residential building went ahead.</p> <p>All that said, I appreciate the need to utilise council assets, and provide facilities to the community, so I would support the use of the day centre as a nursery, educational facility or community centre. The Meadway Community Centre is so over stretched, it is impossible to get a booking for a party or community event without months and months of notice. I feel certain that the demand exists for us to support the use of the old Mereway Day Centre as a community resource, as my family and many others are constantly having to hire venues further afield for parties, events and fitness classes. Such usage would also require minimal conversion costs. The building could similarly be used as a nursery, or similar small educational establishment, with only minimal alteration. There is ever present demand in the area, and despite the obvious extra traffic at drop-off and pick-up times, I see no reason why some car parking could not be provided on site for staff. The impact would therefore be dramatically less than for residential use, which would seem a fair compromise, and so I would not object.</p>
82	John Curtis	<p>I live at number 65 Mereway Road, this site backs on to my property. I appreciate this site needs to be utilised for something and would prefer a school or nursery rather than housing.</p> <p>I would urge you to take into account the following things:-</p> <p>Parking is already incredibly difficult on this road and a very high number of families with young children live here which makes parking far away from your property very inconvenient.</p> <p>A 2 storey building will overlook my property - if the day centre can be converted into a school or nursery using the existing low level building this will greatly minimise disruptive building work and avoid my house being overlooked.</p> <p>The road that runs off Mereway Rd down to the day centre is used by a lot of children going to Kneller Gardens via the White bridge - the onset of building work with trucks, lorries could be very dangerous as children have no pavement to walk on and are forced to walk on the road to access the bridge to the park.</p>

Detailed comments – where respondent gave no indication if supporting or objecting:

Ref. no.	Name/Organisation	Comment
99	Rob Gray, FORCE	<p>This proposal does not mention its location within the Crane valley and its extended boundary with the river itself. FORCE would expect that any re-development of this site would acknowledge its location adjacent to the River Crane and would include benefits to the river corridor.</p> <p>This proposal includes the potential for an educational use. There is no appropriate open space available for this use. FORCE would oppose any proposal to use Kneller Gardens for educational open space associated with this development.</p>
27	Richard Turk	<p>Following our recent telecom re the above please find my comments on the proposals for the Mereway Day Centre. I note you have said that Residential may considered .Could I please state a number of reasons why Residential might be an inappropriate use of this site. Firstly the Council has recently cut back the available parking at the adjacent end of Mereway Road. This will mean the introduction of any new dwellings in the Road will put intolerable strain on the parking in the area .Even one car would cause a problem. Even if there is an attempt to put parking on the site the usual overspill we saw when Barneby Close was built will affect the surrounding area. That is even a one bedroom flat could produce two cars.</p> <p>Then we have the sheer population density of the area which would be created by this residential development. The only clear space in the area this side of the Crane will be the tiny green area by the Environment Agency facility.</p> <p>Then we have the fact that any two storey buildings will overlook the houses at the end of the Road and the backs of houses in Barneby Close .</p> <p>Also there is the environmental effect of building any two storey buildings along the River Crane and the views from the Crane and Kneller Gardens.</p> <p>I believe education was also mentioned as a use .I do not think this could possibly a site for a school as it would seem to be too small for that .But it could be a good place to set up a preschool /Nursery .There are a lot families in the area with young children for whom this could be a useful facility .Also being a former Council Day Centre it presumably would be well equipped for such a use. It would presumably require little in structural changes and not need any building of any storeys above the existing height of the building.</p> <p>I hope you will take my views into consideration in your deliberations on this site's future usage .Could you please acknowledge receipt of this communication.</p>

TW 14 Rugby Football Union, Whitton Road, Twickenham

Detailed comments – where respondent supporting it:

Ref. no.	Name/Organisation	Comment
133	Dale Greetham, Sport England	Support - site policies should specifically state that the existing sports facility provision will be protected
99	Rob Gray, FORCE	We welcome the proposal that any future development at this site would be required to protect and enhance the environment of the DNR and associated MOL.
170	Sarah Considine, Greater London	TfL welcomes retention of coach parking in this location, in accordance with London Plan Policy 6.13. TfL will work closely with the applicant and Council on the development of the crossing options.

Ref. no.	Name/Organisation	Comment
	Authority	

E TW 15 Mereway Road Industrial Estate, Twickenham

No comments received

E TW 16 St George's Industrial Estate, Twickenham

No comments received

E TW 17 Swan Island Industrial Estate, Strawberry Vale, Twickenham

Detailed comments – where respondent objecting to it:

Ref. no.	Name/Organisation	Comment
102	Linda Rees	<p>In respect of the pre-publication Site Allocation Plan, we would like to make it clear that we are <u>not</u> part of the so-called "Swan Island Industrial Estate". Mercury Motors owns the garage at 5-7 Strawberry Vale, the convenience store (1A Strawberry Vale), the residential flat above (1B Strawberry Vale) and the house adjacent (11 Strawberry Vale). As such the whole site should be allocated as a mixed use site, i.e. residential and employment as it is at present, otherwise the borough will lose valuable housing, which is obviously not the scheme's intention.</p> <p>Furthermore, precedents have already been set in the borough with the old Grundy factory site in Somerset Road, Teddington, Tough's Boatyard and Gibsons Roller Factory in Strawberry Vale which is now Mallard Place, and the Royal Mail Sorting Office in Twickenham, for example, changing from industrial and employment use to either mixed or residential uses.</p>
171	Sati Panesar, DHA Planning & Development on behalf of Francis H Newman (Shipyards) Limited	<p>I act on behalf of Francis H Newman (Shipyards) Limited, who is the freehold owner of Newman's Shipyard & Business Park.</p> <p>I am writing in direct response to the Site Allocations Plan - Pre-Publication Consultation, which proposes to designate Newman's Shipyard & Business Park together with the adjacent site known as Mercury Motors, as a Key Employment site under site reference E TW17 Swan Island Industrial Estate.</p> <p>I am submitting the following duly made representations, which relate specifically to my client's ownership, namely the Newman's Shipyard & Business Park, in respect of the proposed designation. I sought to use the Council's proforma response form but it contains some formatting errors, which cannot be corrected because the document is locked for editing purposes. To this end, I am submitting my client's representations by way of a letter, but for ease of reference, I have sought to set out the representations using headings and references, which would allow you to incorporate them into your standardised format.</p> <p>Background</p>

Ref. no.	Name/Organisation	Comment
		<p>Newman's Shipyard & Business Park is a family owned estate and it was originally used as a boating and shipyard. However, changes in the shipping and boating industry over the years has meant that the demand for uses involved with this industry has declined and therefore alternative forms of businesses and associated employment have taken over. This is partly due to the changes in the industry and partly due to the owners seeking to find alternative employment uses and occupiers in order to retain a viable estate.</p> <p>In light of the above, the estate is presently occupied by a collection of thirteen different businesses. Some occupy very large buildings because their business is involved with wholesale retail and therefore large storage areas are required from where distribution takes place. Other businesses occupy much smaller units because their businesses provide professional consultancy services or small products for distribution. There are one or two businesses involved with motorcycle and motor car repairs. In addition, there is a residential flat and moorings for 30 house boats. Hence, the estate has a very mixed and wide range of uses and functions.</p> <p>Pedestrian and vehicular access into the estate is not ideal because the access off Strawberry Vale is situated very close to the roundabout junction. This makes ingress and egress very challenging for large commercial vehicles. Furthermore, within the site, there are two distinct parts of the estate, which are linked by a very narrow bridge. This results in further restricted access arrangements because large commercial vehicles are too heavy for the bridge and smaller commercial vehicles have to negotiate very restricted spaces when ingressing, turning around and egressing in forward gear. Hence, the potential for pedestrian and vehicular conflict is very high.</p> <p>Finally, the owners of the estate have found it very challenging at all times to maintain a viable occupancy level. Often, interested occupiers are either restricted because of the current use of the buildings, often requiring a change of use, or the planning application process together with all of the other associated requirements, such as renewable energy and planning gain, tend to force occupiers to look elsewhere where such a change of use to the planning status of the building would not be required. The restricted access and parking arrangements is also a further negative factor. To this end, the owners have always had empty buildings, which they are seeking to let.</p> <p>The residential element of the estate relating to the flat and moorings is always operating at full capacity because of the very high level of demand.</p> <p>Ownership</p> <p>The proposed E TW 17 Swan Island Industrial Estate designation is concerned with two sites in different ownerships. That part known as Newman's Shipyard & Business Park is in my client's ownership and the adjacent site is in the ownership of Mercury Motors, another family owned business.</p>

Ref. no.	Name/Organisation	Comment
		<p>There have been previous attempts to consider the joint benefits of the two sites but these have met with difficulties. Hence, the likelihood of securing a comprehensive form of development with improved access arrangements remains very slim because this has been explored in previous years and to no avail. To this end, the likelihood of delivering the Council's proposed visions through the Key Employment site designation would appear to be slim unless the Council were prepared to exercise its compulsory purchase powers, which is also an unlikely prospect.</p> <p>In light of the above, the proposed designation will encounter land assembly issues, and as a result will not be able to provide the required access. Furthermore, there is no commercial viability in the Council's proposed designation, which would encourage the two different parties to reach a unified position and therefore the proposed designation is not only unviable but it is also incapable of delivery.</p> <p>Proposed Designation as a Key Employment Site</p> <p>The owners feel that the proposed designation would result in a blanket restriction, which would make it even more difficult in the future to retain optimum occupancy of the estate for employment and residential purposes. It is evident from the existing occupancy levels together with the very diverse range of businesses and their respective employment allied with the residential element, that one of the successes underpinning the estate is its ability to retain some form of flexibility.</p> <p>In other words, at present, Policy DM EM2 of the Development Management Plan is open to considering all uses that generate employment subject to satisfying the initial criteria surrounding marketing of the premises and other environmental considerations. It is evident from the proposed changes, that only Class B uses will be recognised as employment uses within Key Employment sites and all other uses would be excluded or deemed contrary to the proposed designation. This would present a major obstacle for the owners of the estate because much of the occupancy that they have generated over the years has been through businesses that do not neatly fall into any of the Class B uses but are hybrids. In addition, there is the residential element, which is an important characteristic feature of the island. The proposed designation will no longer recognise this and would therefore be a retrograde step.</p> <p>The proposed designation together with its blanket restriction would also go against the tenets of the NPPF (2012), which recognises and supports businesses and the identification of new or emerging sectors, which are innovative in what they do, but yet provide a diverse range of employment and skills.</p> <p>Furthermore, the URS Employment Land Study (2009) and the PBA Richmond Employment Sites and Premises Report (2013), both recognise that businesses in industry and warehousing are relatively inactive and demand for space from these sectors has historically been low with occupiers preferring more established industrial areas. This is also a view that has been reinforced by local agents and acknowledged within the same reports. To this end, the reports predict that take up of space in these sectors will continue to decline.</p>

Ref. no.	Name/Organisation	Comment
		<p>In view of the above, a more flexible and pragmatic approach is required in order to seek new and emerging employment markets and not one that adopts a total blanket prohibition. In fact, the URS Employment Land Study (2009) makes a very valuable land use recommendation, which whilst seeking to retain existing industry and warehousing employment activities, also recognises that where such sites become inherently unsuitable for such employment uses, to consider favourably changes to other employment generating uses together with mixed uses. The Council should be following this recommendation, which would also embrace the prevailing situation.</p> <p>I note that the Council have provided a justification in respect of each of the proposal sites together with the inclusion of a plan identifying the site in red outline. However, in respect of the proposed designation E TW 17 Swan Island Industrial Estate, Strawberry Vale, Twickenham, the Council have provided absolutely no justification whatsoever. In the absence of any justification, the proposed designation appears flawed.</p> <p>Access</p> <p>The proposed designation as a Key Employment site does not fully recognise the access constraints, which have been a constant issue within the estate. The main access off Strawberry Vale is already at a very dangerous junction due to its proximity to the roundabout junction. This arrangement is further compromised due to the very restricted and convoluted access route over the bridge onto the island section of the site. These combined characteristics together with the limited area available for circulation and turning can often result in vehicles having to undertake reverse manoeuvres over the link bridge and onto Strawberry Vale, particularly where large commercial vehicles are involved. To this end, the estate offers very limited opportunity for further expansion or intensification due to the access constraints.</p> <p>In light of the above, and in order to make the best use of existing land and buildings, this is very much likely to be through the change of use of existing buildings for alternative employment generating uses as opposed to a total redevelopment solution. There may be instances where it would be appropriate to allow for alternative employment uses falling outside of Class B, which generate less traffic or are more sustainable than some of the Class B uses. The proposed designation would not allow the facilitation of this and the status quo should therefore be maintained.</p> <p>Flooding</p> <p>It is understood that the site falls within the flood plain. Therefore, one of the determining factors in terms of land use will be vulnerability in the context of the flood plain. This is an important determining factor that needs to be weighed up in the context of the proposed designation because otherwise there is a danger that different land use considerations pulling in different directions may result in my client's site becoming totally sterilised.</p>

Ref. no.	Name/Organisation	Comment
		<p>Policy DM OS11 of the Development Management Plan is concerned with the Thames Policy Area. It seeks to improve the character of this area by opening up views and vistas of the river, by taking advantage of its location and addressing the river as a frontage and encouraging development, which includes a mixture of uses, including uses which enable the public to enjoy the riverside, especially at ground level in buildings fronting the river. This is presently achieved by the variety of the existing employment and residential uses together with the variety of the built form relating to the buildings and moorings.</p> <p>The proposed designation in this regard would severely curtail these important objectives for the Thames Policy Area. To this end, there is a further need for the proposed designation to recognise the important benefits of facilitating a variety of land uses that generate employment and mixed uses as part of the overall strategy for the Thames Policy Area.</p> <p>Metropolitan Open Land & Conservation Area</p> <p>The proposed designation site is situated adjacent to Metropolitan Open Land and adjacent to the Twickenham Riverside Conservation Area. The proposed designation as a Key Employment site has not had any due regard the impact such a designation might have on the character and openness of the Metropolitan Open Land and indeed the character and appearance of the Conservation Area.</p> <p>Policy DM OS2 of the Development Management Plan states that when considering development on sites outside Metropolitan Open Land, any possible visual impacts on the character and openness of the Metropolitan Open Land should be taken into account. The proposed designation as a Key Employment site has not demonstrated how this has been taken into account.</p> <p>The same considerations apply in respect of the adjacent Conservation Area. Both the URS Employment Land Study (2009) and the PBA Richmond Employment Sites and Premises Report (2013) recognise that existing sites used for industry and warehousing are often hemmed in by housing or require access via residential areas or are otherwise in sensitive locations. This therefore presents challenges. To this end, the two studies recommend the protection of employment land and buildings in accordance with Policy DM EM2 of the Development Management Plan but support mixed use developments with an employment element. The proposed designation has not given sufficient weight to these recommendations.</p> <p>Twickenham Area Action Plan</p> <p>The Twickenham Area Action Plan (2013) proposes new employment as part of mixed use development schemes. It also acknowledges that although employment uses are generally considered to be within offices or light industry, a considerable number of people would be employed in some of the other uses proposed, such as retail or leisure. To</p>

Ref. no.	Name/Organisation	Comment
		<p>this end, Policy TWP 2 seeks to retain existing employment land unless it is inherently unsuitable for such purposes in which case it would be appropriate to change to offices or offices with a mixed use. This is consistent with the recommendations of the URS Employment Land Study (2009) and the PBA Richmond Employment Sites and Premises Report (2013).</p> <p>Furthermore, the PBA Richmond Employment Sites and Premises Report (2013) recognises the need for regeneration in Twickenham. It states that Twickenham is in need of investment, improved retail, leisure and community uses, enhancement of the public realm and traffic problems should be addressed. This is further recognised in Policy TWP 3 of the Twickenham Area Action Plan where greater access is promoted for residents and visitors to the riverside together with the encouragement of new retailers and other businesses.</p> <p>The proposed designation should therefore give due regard to this common thread of mixed uses and the full range of employment generating uses that is found in all of the various policy documents and research.</p> <p>Conclusion</p> <p>In conclusion, my client feels that the existing protection afforded to employment sites under Policy DM EM2 of the Development Management Plan is more than adequate because it protects employment land and buildings together with the residential flat and moorings in the first instance and allows flexibility for the consideration of alternative employment uses. Their site has not been under any threat in the past for non-conforming uses, albeit that it already contains a residential use component, and the owners have diligently fought hard to retain the character of the estate by seeking to locate new occupiers every time any part of the site or buildings have become vacant. In light of this, my clients would submit that the proposed designation as a Key Employment site is totally unnecessary and should therefore be struck out.</p> <p>However, should the Council elect to retain the proposed designation, then it is absolutely imperative that it allows for the consideration and inclusion of all employment generating uses and not just those restricted to Class B together with the incorporation and retention of the residential flat and moorings. Furthermore, it should also recognise the benefits of mixed uses in conjunction with the retention of existing employment. Further consideration should also be given to the fact that the site falls within the Thames Policy Area and adjacent to Metropolitan Open Land and the Twickenham Riverside Conservation Area.</p>

Detailed comments – where respondent gave no indication if supporting or objecting:

Ref. no.	Name/Organisation	Comment
31	Andrew Wallace	Important to note that Swan Island is also home to over 40 people: there are about 40 'households' here living permanently in

Ref. no.	Name/Organisation	Comment
		houseboats and boats (and paying Council Tax). Access to the mainland - for work, shopping, water, telecoms, etc., - is via the bridge to Swan Island.

Comments on all Twickenham Sites

Ref. no.	Name/Organisation	Comment
99	Rob Gray, FORCE	<p>General comments with respect to all sites in Twickenham</p> <p>Friends of the River Crane Environment (FORCE) is a local environmental and community based charity focused on the open space corridors of the River Crane and Duke of Northumberland's River within London Borough's of Richmond and Hounslow. FORCE has been operating for ten years and has around 500, mostly local, members.</p> <p>FORCE has engaged with the council and other local landowners in the development of plans for the lower Crane valley and adjacent sites for much of this ten year period. We contributed to the supplementary planning guidance for the area http://www.richmond.gov.uk/crane_valley_spg-2.pdf and the Twickenham Area Action Plan, and we worked with Richmond and Hounslow councils in the production of the Feasibility Study for Crane Valley Park, an extended park area that would link Twickenham Station with Hounslow Heath.</p> <p>We have applied the same principles to all the development proposals that have been put forward for this area; that we will be supportive in principle of development if it can be shown to also provide clear net benefits to the local environmental and community value of the Crane corridor. We shall apply this same test to the Site Allocations Plan proposals.</p> <p>2.0 Overview</p> <p>2.1 The proposals for the Lower Crane Valley</p> <p>There are five sites in the site allocations plan within the Lower Crane Valley viz:</p> <p>TW8 Harlequins TW9 Central depot TW10 Richmond College TW11 West Twickenham cluster - Greggs etc TW13 Mereway Day Centre</p> <p>The proposals for these sites include some or all of:</p> <p>TW8 – existing uses plus new north stand, leisure, hotel and business uses TW9 – existing uses plus sports hall and leisure or other ancillary education use; residential and business units TW10 – new college, offices (presumably 1100 person corporate HQ for publisher – as outlined in a press release from the council earlier this year), secondary school and special school, residential and upgrading of college field TW11 – residential, business, and primary school TW13 – housing or school</p> <p>2.2 The Crane Valley Supplementary Planning Guidelines, 2005</p> <p>Previous planning guidance was given for all these sites by the council in the Crane Valley Supplementary Planning Guidelines, 2005. This document sets out; <i>“a positive policy of environmental improvement, improved access and sympathetic development will be applied to the River Crane “area of opportunity” as shown on the proposals map.”</i> It states that <i>“The proposed planning vision for the Crane Valley Development Guidelines area is (section 3 page 7):</i> <i>To develop the area to the highest environmental standards based around an improved riverside, a riverside walkway and improved open spaces, meeting the housing, recreational and educational needs of the area”</i></p>

Ref. no.	Name/Organisation	Comment
		<p>The objects of the guidance include:</p> <p><i>To protect and enhance the natural environment of the River Crane, the Duke of Northumberland River and their banks as part of the wider West London Green Chain and Blue Ribbon network as identified in the London Plan;</i></p> <p><i>To improve the appearance and recreational value of the open space including the provision of a river walk and the associated pedestrian/cycle linkages; taking account river corridor ecology.</i></p> <p><i>To ensure that new development is compatible in scale and character with the local area; minimising any adverse impacts including flood risk.</i></p> <p><i>To minimise traffic and other impact on the surrounding area, particularly on the Heatham estate, to reduce severance and to improve pedestrian and cycle linkages within the area and to the surrounding area;</i></p> <p><i>To ensure the provision of appropriate local community facilities including for education and health and the community use of buildings and playing fields</i></p> <p>The section on open spaces includes (p24):</p> <p><i>A key component of the proposals will be enhancing nature conservation interest and biodiversity. There is an opportunity to bring the open space of the area to the same high degree of nature conservation interest that exists along the un-channelised banks of the River Crane West of the guideline area within the wider West London Green chain. In particular there exist opportunities to create a level of naturalisation of the river banks, subject to a flood risk assessment and agreement with the Environment Agency.</i></p> <p>The section on Flood Risk and River Restoration includes (P25):</p> <p><i>Development proposals must contribute to a scheme for restoration of more naturalised banks to the river through the framework area. This would remodel or replace parts of the concrete vertical sided channel to establish marginal vegetation and to improve its nature conservation value, as well as increasing water quality.</i></p> <p>The Supplementary Planning Guidance was welcomed by FORCE and we considered this to be the starting point for development and implementation of a detailed plan for the area, providing benefits for the environment and local community. However, there has been no further overall planning work done for this area to our knowledge, and the area was specifically excluded from the Twickenham Area Action Plan.</p> <p>2.3 Consideration of the overall impacts of the Site Allocation Plan</p> <p>The site allocation plan would result in a considerable number of new demands on the local area arising from the proposals, including:</p> <ul style="list-style-type: none"> Land area for buildings Open areas for new residents Playground and sports areas for children – special needs, primary, secondary and college – presumably with limited potential for sharing Parking for schools and businesses Transport demands on the local road network from more housing, business, school and increased match day traffic <p>We are not aware of any work undertaken by the council or others to show what the impact of these demands will be and how they might be mitigated – certainly it has not been shared with FORCE or the wider community. Particularly, from our perspective, there is no evidence that there is sufficient land available to meet these needs, whilst also providing environmental and community benefits as set out in our aims for the area and the Council’s own Supplementary Planning Guidance quoted above.</p> <p>FORCE believes it is not tenable for the council to be proposing such wholesale changes to the land use for the area without first assessing if and how the available land can absorb these changes. We further consider that any plans for the area have to use</p>

Ref. no.	Name/Organisation	Comment
		<p>the objectives of the 2005 SPG as a starting point and be comprehensive in nature. As noted above, FORCE would be supportive in principle of development if it can be shown to be clearly beneficial to both the natural environment and the local community use of the Crane valley. In our view this cannot be done for these plans in the absence of any overall assessment of the impact of the proposals. Making the changes to the site allocation plan before evaluating the impact of these changes on the area is putting the cart before the horse.</p> <p>2.4 In Conclusion</p> <p>In the absence of evidence to the contrary, we have to assume that these major development proposals will have a major additional demand on local open space for building, parking and segregated outdoor uses etc. The impact of the considerable additional use of the area will also, in the absence of any plans to the contrary, negatively impact the community and environmental value of the remaining open spaces along the Crane valley.</p> <p>We have worked for many years alongside the council in the lower Crane valley, seeking to improve its environmental value, provide linkages for walking and cycling, and enhance the community use and appreciation of the Crane valley asset. None of these initiatives are referenced in this plan and it is not clear how they might be delivered through the development process following on from the plan.</p> <p>FORCE therefore opposes in principle the Site Allocation Proposals as set out in the consultation document. We believe that any proposals to make major changes to site allocations in this area need first to assess if they are viable and what the impacts (positive and negative) will be on the Crane valley and the environmental and community value of its open spaces. It is only following this assessment that the proposal can be considered rationally by the local community and all other interested parties.</p>

Possible additional sites in Twickenham suggested by respondents:

Ref. no.	Name/Organisation	Comment
152	Catherine Widdowson, Nathaniel Lichfield & Partners on behalf of St Mary's University College	<p>Possible new site</p> <p>On behalf of our client, St Mary's University College (SMUC), we have reviewed the Council's Site Allocations Plan, Pre-publication version, which has recently been published for consultation. This letter is submitted along with the Site Allocations Plan Response Form and we set out our representations below.</p> <p>Background</p> <p>SMUC's main campus on Waldegrave Road occupies an area of just over 14 hectares. It predominantly comprises a mix of academic and administrative buildings along with halls of residence, which provides accommodation for over 700 of its students. Existing development is mainly concentrated in the western and southern areas and a new sports hall was completed in 2011 towards the south western corner of the site. SMUC also has sports facilities at Teddington Lock.</p> <p>SMUC is an important asset to both the economy of the Borough and as part of its community. It has a registered student population of around 5,000, many of whom live in and around the Borough, and it creates employment both directly (with approximately 800 staff) and indirectly with a turnover of some £40M. It is vital that SMUC is able to continue providing students with excellent teaching, support and guidance if it is to continue to thrive and maintain its position. It is also essential as SMUC works towards achieving "University" status.</p> <p>SMUC's Estates Strategy identifies a need to ensure that all services and facilities are fit for purpose and which meet the needs of SMUC's diverse community. It recognises that the campus and its facilities are critically important factors in recruiting and retaining both students and staff. It is therefore important to maintain and enhance the attractive qualities of the campus, which enable it to continue to foster a safe, secure and welcoming environment.</p>

Ref. no.	Name/Organisation	Comment
		<p>In 2008, SMUC had 3,800 students undertaking a wide range of courses (at foundation degree, undergraduate and post graduate level across five academic schools) and employed in the region of 600 staff based both on and off-campus. SMUC has expanded since then and over the last few years, these numbers have risen to 5,000 students and 800 staff.</p> <p>One of SMUC's corporate aims is to improve and extend the range of educational opportunities offered and there will be associated requirements to provide a wide range of teaching and learning facilities, of an appropriate size and type, to meet the needs of different groups of students on site. The current Estates Strategy has seen upgrading of facilities across the campus, but this will need to continue if the Institution is to provide the Borough with a 21st Century University learning environment in which students can achieve their potential. In this context, a number of existing buildings are in a relatively poor condition and require urgent investment to meet modern teaching standards.</p> <p>It is also important to ensure that there is sufficient, good quality office space in order to attract, develop and retain high calibre staff. Likewise, it is also noted that SMUC's grounds and external environment continue to be upgraded with improvements to landscaping, paths and roads, lighting, signage and navigation around the campus.</p> <p>Ensuring and promoting disability equality is a priority of SMUC, and this includes improving access for everyone. Over half of SMUC's teaching and learning space was built before 1960, with a number of these buildings listed, and a number which do not fully meet disabled requirements. Whilst, new building and refurbishment work continue to be carried out in line with good practice, SMUC aims to continue to reduce impediments to access and to improve links between buildings, circulation areas, lighting and visibility.</p> <p>Specific Priorities</p> <p>SMUC has identified a number of key strategic aims which are essential to enhancing SMUC's offer, but which will increase pressure for improved and upgraded accommodation. These areas are as follows:</p> <p>Strengthen the research capacity of SMUC – with changes to course modules and teaching, additional space is required for staff, research groups and research students</p> <p>Growth of activities relating to CPD and employer engagement outside the core timetabled day, which in turn ensures that SMUC's knowledge and expertise benefit the wider community – demand for an increasingly wide range of types of space</p> <p>Expand the numbers of international students – demand for appropriate residential accommodation, social and support facilities.</p> <p>However, it is the introduction of the £9K tuition fee regime which means that expectations of existing students continue to increase and the quality and quantity of facilities need to keep pace with these increased demands.</p> <p>The existing learning resource centre (LRC) has had various extensions over the years. The most recent being the approaching completion of the library infill project, which will create 110sq.m of much needed learning space from an existing flat roofed area above the LRC. However, whilst a significant benefit, it is still not sufficient to support the current student population and fails to provide a satisfactory amount or quality of space. Essentially the 1,800sq.m floor area is materially unchanged from 1995, despite the student population nearly doubling. Improved and additional facilities are urgently required. During peak times occupancy exceeds 100% and it becomes extremely noisy and busy, not providing an appropriate learning environment for students. There is a particular demand for more clearly defined silent, group and social spaces, fixed computing areas, law library and improved resource areas within the LRC. This demand was recognised by the Planning Department in the summer of 2013 in relation to SMUC's pre-application submission for additional library development.</p> <p>In addition to the improvements required to the LRC, SMUC has a direct need for local and affordable residential accommodation for its students, 700 of which live on campus. Current intakes show that there is a substantial 'pent up' demand for additional accommodation estimated at up to 700 bedrooms (comprising year 1 demand not met and residual demand from years 2 and 3). With restricted opportunities to develop and create additional new accommodation on campus and high local property rents,</p>

Ref. no.	Name/Organisation	Comment
		<p>SMUC continues to work with local agencies and property providers to seek to satisfy student accommodation needs.</p> <p>Constraints to Development</p> <p>The site occupies a large area, which is constrained by Waldegrave Road to the west, the rear gardens of residential properties to the east, and partially by Waldegrave Park and residential properties to the south.</p> <p>As defined on the Unitary Development Plan Proposals Map, a large proportion of the site is designated as Metropolitan Open Land (MOL), the northern part of the site is designated as a Historic Park and Garden (Grade II*), the southern part of the site falls within the Waldegrave Park Conservation Area, and there are a number of statutorily listed buildings (including the Grade I listed Strawberry Hill House) on the site.</p> <p>Representation</p> <p>In view of the above, SMUC is seeking to establish a position through the Site Allocations Plan to allow St Mary's to upgrade its facilities, predominantly on site. At present, in view of the clear need to improve and expand facilities, ad hoc, short term measures have been implemented, such as the installation of temporary portakabins which provide essential office and teaching space. Although these help the current situation, they do not offer a long term solution to the requirements of SMUC.</p> <p>The NPPF recognises that <i>"the planning system should play an active role in guiding development to sustainable solutions"</i> (para 8) and advises that <i>"LPAs should positively seek opportunities to meet the development needs of their area..."</i> (para 14).</p> <p>Policy 3.18 of the London Plan, which is referenced at paragraph 2.6.2 of the draft Site Allocations Plan, states that the Mayor will support the provision of higher education facilities adequate to meet the demands of a growing and changing population and to enable greater educational choice. It also states that in preparing their LDF's, Boroughs should provide the framework to secure sites for future provision, recognising local needs and the particular requirements of the education sector.</p> <p>This position is also supported by LB Richmond. Policy CP18 of the Core Strategy supports the provision of education and training facilities and notes that <i>"The potential of existing educational sites will be maximised through redevelopment, refurbishment or re-use to meet educational needs"</i>. The supporting text notes that additional need has been identified in post-16 learning, including life-long learning, which is mainly provided in the borough by Richmond Adult Education College, Richmond upon Thames College and St Mary's University, and also through voluntary educational activities. It specifically notes that <i>"...there will be a need to continuously update and refurbish existing facilities to provide modern and up to date facilities which meet the needs of the community, and enable voluntary educational activities to continue"</i> (para 8.3.6.10).</p> <p>Likewise, the supporting text notes that site specific proposals for new or refurbished education facilities should be brought forward through the Site Allocations DPD or through the planning process (para 8.3.6.20).</p> <p>Despite the recognition in the Core Strategy that there is a need to upgrade facilities such as those provided at St Mary's, the draft Site Allocations Plan (para 2.6.18) states, in reference to SMUC and Kingston University, that <i>"The Council has not identified any further site specific needs within the Borough in relation [to] either University"</i>. This is inconsistent with Core Strategy policy. As identified above, there is a pressing need to improve and upgrade existing facilities, as well as provide additional accommodation if SMUC is to maintain its position and continue to attract staff and students. This is particularly important as it works towards final achievement of "University" status. In recognition of this, we object to the wording of paragraph 2.6.18 and request that reference to SMUC is omitted from this paragraph.</p> <p>In order to address SMUC's requirements and in recognition of the constraints of the site, we consider that a paragraph should be included which recognises the additional accommodation requirements. We suggest the following paragraph could be included: <i>"St Mary's University College supports around 5,000 students with specialisms in Sports and Teaching Training. Its main campus is on Waldegrave Road in Twickenham, but it also has sports facilities at Teddington Lock. The University College has an urgent need to improve and upgrade its existing teaching, library and residential accommodation. There is also pressure on existing</i></p>

Ref. no.	Name/Organisation	Comment
		<p><i>space, and in order to provide an appropriate range of teaching and learning facilities, improved and additional accommodation is required to meet the demand”.</i></p> <p>In addition, we consider that the site should be identified within the Site Allocations Plan (see drawing ref IL13749/001 attached) as an area suitable for sensitive upgrading and improvement of existing facilities, and extensions/new build where appropriate. Given the sensitivities and constraints of the site combined with the complexity of the SMUC operation, we would suggest that this could be developed further through a Development Brief for the site, which identifies areas, parameters and principles for the upgrading of existing facilities and areas for potential development. There are clearly areas within the site which provide opportunities for future development. This includes areas outside any restrictive designations within the built up area of the site. This approach would provide a framework within which new development can be considered. Such a comprehensive and holistic approach would provide certainty for SMUC and its ability to meet its requirements, as well as for the Council and local residents and other key stakeholders. It is also consistent with Core Strategy policy.</p> <p>We suggest the following designation wording may be appropriate: <i>“The Council will support St Mary’s University College in upgrading and improving its Waldegrave Road site, along with the possible expansion of existing buildings and/or elements of new build where appropriate. The Borough will work in partnership with the University College to prepare a Development Brief for the site, which sets out parameters and principles of development, which will guide the future development of the site. In particular, any proposals will need to demonstrate that they do not have an adverse impact on the setting of the MOL and preserve the significance of any heritage assets”.</i></p> <p>The Development Brief option offers the potential to allow the Council and SMUC to also look beyond the main Waldegrave Road site and consider the improvement and upgrade of facilities through the development and/or change of use of sites elsewhere in the local area.</p> <p>Similar Examples</p> <p>We have dealt with a number of sites throughout the UK where a similar approach has been adopted. Although the circumstances may be different, the principle of identifying a large site to guide future development is similar to the situation at St Mary’s. This includes:</p> <p>Royal Borough of Kingston upon Thames – the Council’s Core Strategy (adopted April 2012) contains a number of site specific policies relating to “areas of change” (including policies HV1 and T1). In addition, various policies refer to the continued designation of a number of sites as Major Developed Sites (including Chessington World of Adventure), the Core Strategy supporting text, for example, notes that “...at Chessington World of Adventure, it is important to ensure that new and improved visitor attractions are provided within the Major Developed Site” (para 6.120).</p> <p>East Staffordshire Borough Council is proposing a similar policy in its emerging Local Plan (Detailed Policy 12) in respect of the National Football Centre, St George’s Park (the Council is currently undertaken consultation on the full version of the Local Plan that it intends to submit to the Secretary of State).</p> <p>Concluding Comments</p> <p>We trust that these comments assist in the finalisation of this document. We consider that revisions to the document in line with our comments are appropriate and will assist in facilitating the sustainable development of the site, which is central to planning policy at all levels. Given the importance of this document to SMUC, we consider that a meeting would be useful to further discuss St Mary’s future requirements in the context of the emerging Site Allocations Plan.</p>
1	Julie Hill	Disappointing to see that most of the suggestions have been discounted and not included ! Doesn't seem there will be many sites

Ref. no.	Name/Organisation	Comment
		<p>at all to develop.....</p> <p>I don't understand why my suggestion of utilising the empty Parking Shop next to the Shell Garage was discounted - what is it going to be used for instead? Also, I suggested another former Parking Shop in Holly Road, yet there is no mention of that in the document.</p> <p>One other site I and many other people are intrigued as to why it has never been utilised for social rented housing is the large stretch of grass / tarmac adjacent to the Harlequins on the A316. It is vast, never utilised and at least 10 homes could be built on it and still leave room should it be used as an overspill car park...</p>

Sites in St Margarets

E SM1 St Margarets Business Centre, Winchester Road, St Margarets

No comments received:

E SM2 Waterside Business Centre, Railshead Road, St Margarets

Detailed comments – where respondent objecting to it:

Ref. no.	Name/Organisation	Comment
169	Kevin Goodwin, CgMs on behalf of Goldcrest Land	<p>The document suggests that the site should be designated as a Key Employment Site in the Site Allocations document. Objection is raised to this on the following grounds:</p> <p>The site is an outdated collection of structures that do not meet current energy requirements and spacial requirements of employment occupiers. A significant part of the floorspace is vacant with some being long term vacant. The Council has effectively accepted that this location is not an office location and this has been demonstrated with the long term vacancy of space in the adjoining building.</p> <p>There are currently two planning applications before the Council that seek the redevelopment of the site - one that proposes a mixed use scheme with no affordable housing and the other a more residential led scheme with some live/work space but with affordable housing.</p> <p>There has been local support through community consultation to the redevelopment of the site. This site was not identified as an employment site in the Councils Employment land and Premises Assessment (March 2013).Figure 6.2 of this assessment identifies 'key sites'. This identifies three sites in the St Margarets Ward that are further south than this site. The site is not included in the list of five 'key sites' in the ward that are set out in the Table that follows paragraph 6.50 of that assessment. The Councils 'Background Paper - Needs Assessment – Employment Last updated September 2013' provides no specific support for either the retention of the site as an employment site and certainly not a 'key employment site'. We have been unable to identify any evidence base that supports the proposed designation of the site.</p> <p>Recommendation: That the sites designation as a 'Key Employment Site' be deleted.</p>

E SM3 Twickenham Film Studios/Arlington Works, Arlington Road, St Margarets

Detailed comments – where respondent gave no indication if supporting or objecting:

Ref. no.	Name/Organisation	Comment
46	Richard Parish for English Heritage	The proposed site is allocated for residential development and lies in relatively close proximity to Twickenham Park, Crown Rd, and the St Margaret's Estate conservation areas. We would therefore recommend that a requirement for any further development on the site to preserve and/or enhance the setting and character and appearance of the conservation areas. We would also consider that guidance on design and overall aims of the proposal should be included.

Sites in St Whitton

WT 1 Whitton Library, Nelson Road, Whitton

Detailed comments – where respondent objecting to it:

Ref. no.	Name/Organisation	Comment
145	Patricia Whitfield, Chairman of Whitton restroom (+ petition signed by 47 people)	With regards to the proposed plan to reposition the Library, I should like to know how these plans will affect Network and the Whitton Restroom. Whitton Restroom has been part of the local community for the seniors of the area for around fifty years, it was moved to the Library complex when it was built. Myself, our volunteers, and regular users wish to know what will happen to us if this plan goes ahead. This restroom is a most important facility for the retired of Whitton. We are completely run by volunteer and give an important service to our community by opening every day of the week, serving beverages and having Xmas and Summer parties. It offers help in many ways, and is somewhere one can meet and talk to other people and feel wanted. As many such places have vanished I want to put our case forward for having this facility kept for the older folk of Whitton. Petition attached signed by 48 Restroom users.
10	Bernadette Bisdee	I am writing with regards to "Whitton Restroom (next to the Library)", as per above. The elderly use the Whitton Restroom for many years from Monday to Friday and we are all very concerned, at the potential lose of their/our social hub. As many of the elderly could not afford local cafe's or coffee shop. Are you intending to replace the Whitton Restroom? Many problems faced by elderly people are very often solved by meeting other elderly people here and who sometimes face same problem by themselves. It has been a very good place for them come. They help each other and raise the money for McMillan Nurses, Support each other, etc, etc. They play Bingo every Wednesday afternoon. The Restroom is self funded. The only other place is Age UK, but that is not open every day, it is not big enough to accommodate the people who go there. We would very much appreciate if you could advice us, as to where you would relocate us, because the Tea Room has been very important place for all the Elderly people in Whitton Community and we wish for that to continue. Please could you consider our plight, and safeguard their social needs.
95	Gwen Wilkinson	I am writing with regards to "Whitton Restroom (next to the Library)", as per above.

Ref. no.	Name/Organisation	Comment
		<p>We have used the Whitton Restroom for many years from Monday to Friday and we are all very concerned, at the potential lose of this hub in the community. Many of the elderly could not afford local cafe's or coffee shops as an alternative and we are concerned that our needs may not be taken into account.</p> <p>Many problems faced by our elderly within the community are very often solved by meeting other people and volunteers who use the Restrooms not only for refreshments, but as a focal points for gaining assistance or find a listening ear. We help each other and also help others by raising money for McMillan Nurses. On a social basis they play Bingo every Wednesday afternoon. The Restroom itself is self funded and run by volunteers.</p> <p>The only other place is Age UK, but that is not open every day, it is not big enough to accommodate the people who go there. We would very much appreciate if you could advice us, as to where you would relocate us, because the Tea Room has been very important place for all the Elderly people in Whitton Community and we wish for that to continue.</p> <p>Please could you consider our plight, and safeguard their social needs.</p>
96	Heather and Eddie	<p>I am writing with regards to "Whitton Restroom (next to the Library)", as per above.</p> <p>We have used the Whitton Restroom for many years from Monday to Friday and we are all very concerned, at the potential lose of this hub in the community. Many of the elderly could not afford local cafe's or coffee shops as an alternative and we are concerned that our needs may not be taken into account.</p> <p>Many problems faced by our elderly within the community are very often solved by meeting other people and volunteers who use the Restrooms not only for refreshments, but as a focal points for gaining assistance or find a listening ear. We help each other and also help others by raising money for McMillan Nurses. On a social basis they play Bingo every Wednesday afternoon. The Restroom itself is self funded and run by volunteers.</p> <p>The only other place is Age UK, but that is not open every day, it is not big enough to accommodate the people who go there. We would very much appreciate if you could advice us, as to where you would relocate us, because the Tea Room has been very important place for all the Elderly people in Whitton Community and we wish for that to continue.</p> <p>Please could you consider our plight, and safeguard their social needs.</p>
97	Helen Noble	<p>Concern is what thought has been given to the Whitton Restroom Network and the public lavatories (essential) part of the library complex. The Rest room and Network provide an invaluable help for the elderly and other vulnerable persons, the government have voiced concerns about their loneliness and isolation. What provision for them?</p> <p>Before even thinking of building homes etc on the site, take a look at the access, a death trap at present for pedestrians whose only access to the High Street from the library is to cross a car park entrance/exit – not ideal. I do not support change.</p>
12	Christopher Bligh	<p>Whitton is a densely populated area. Having a single story library situated behind the high street, coupled with the car park and the road leading to it, gives an impression of space which the local roads do not have. To remove this space by building on part of it would make Whitton even more overcrowded.</p> <p>The area is unsuitable for housing because of the road leading to the car park, plus the number of parents and children who would pass by on their way to and from the two primary schools in Nelson Road.</p>
120	Paul Hampartsoumian	<p>I am a Whitton resident who enjoys Whitton Library facilities.</p> <p>I understand it is being considered that the library be moved from it's current site and the use of the site changed to residential. I understand there is an intention that there be no loss of library facilities in Whitton.</p> <p>I have a number of concerns:</p> <p>1) The public notice on the post outside the library does not specify any justification for moving the library. Instead it states 'subject to reprovisioning etc' This is not justification. The council should not be proposing this without publicly stating any justification.</p>

Ref. no.	Name/Organisation	Comment
		<p>2) The statement about reprovisioning of library services mentions the *possibility* of using the Iceland store. This is a very vague and uncertain alternative to what currently exists. It would be foolish to agree or consider changing usage of the existing site without a clear and definite potential alternative. The uncertainty is increased by the fact that Iceland have no intention of moving out and even if the landlord were to eject them when their lease expires this would probably be at cost in 6 figures due to the length of time they have been there.</p> <p>3) Additionally, IF library users and residents were open to the suggestion of moving the library it should only be under very strict conditions that it's replacement be sufficiently adequate in size and services and certainly no smaller than the existing site.</p> <p>4) There is absolutely no mention on the notice regarding alternative provision for the other usage on site WT1 including public toilets and the Walk in centre for the elderly. It is unacceptable that this provision not be considered or even mentioned.</p> <p>I suggest the current consultation be scrapped and reinitiated in an open and honest form giving *actual reasons* for wanting to move the library from it's current site and addressing the concerns above. This information should be clearly available to the public to comment on before any further plans are considered for such significant changes.</p> <p>We have seen in recent times that library services (Heathfield) have been cut in the face of strong local opposition, various parties blame each other for this and all swear blind they did not want to see it happen. Whoever was responsible makes no difference, the point is that the local residents lost out. I will not stand by and let the same happen here. I started a petition to 'save Whitton Library' both on paper and on the council website - it has been falsely claimed by some to be a 'bogus lib dem petition' - I am not a Liberal Democrat. The online petition has been sabotaged by the council with a premature response which completely disregards one of the main points of the petition - not to move the library from it's existing site.</p>

Detailed comments – where respondent gave no indication if supporting or objecting:

Ref. no.	Name/Organisation	Comment
5	Andrew Maywood	<p>WT1 and WT2</p> <p>it is not clear from the document how the proposals WT1 & WT2 will be accomplished.</p> <p>Do Iceland wish to relinquish the site?</p> <p>Will the present library remain until a new one is complete.</p> <p>Is paragraph 2.7.7 still relevant ?</p> <p>" By 2014, the strategy aims to have delivered: significant building improvements to Whitton Library to improve access and the internal layout, having explored options to co-locate other public services in the re-designed library building</p> <p>I am concerned that the library will be removed, pending its reinstatement and that process will drag on interminably, like the "improvements" on Whitton High Street being carried out by Conway which show no sign of ever being complete or being in any satisfactory.</p>
108	Bridget Clements, Whitton Business Association	<p>WT1 and WT2</p> <p>3.6.2 The WBA would support the idea of bringing the library to the High Street as we expect it would be bring in new users to the library as well as more customers to the businesses in the High Street.</p> <p>The current library building is a good size, it seems well laid out for the user and has a great community feel, so we would hope that these elements would not be lost in a move.</p> <p>The consultation site plans showed the proposed site for the library in just a part of the building which currently houses Iceland i.e. 16-18 only. There are also a bookmakers and hairdressers as well as the vacant unit in this building. Would these units be included?</p>

Ref. no.	Name/Organisation	Comment
175	Cllr Liz Jaeger	<p>Perhaps 3.6.1 could be reworded along the lines:</p> <p>'Subject to the reprovision of the library and associated facilities, including community space for charities and public toilets, this site to be redeveloped. No development will take place until alternative library and community facilities of a suitable size for a main library are completed and occupied. Redevelopment will be for residential and/or employment use.'</p> <p>If a suitable site can't be found for reprovision, is it still on the cards to rebuild the library, or at least the back of it, on site and potentially over two floors? This was the suggestion back in 2009. I have included the possibility of employment use, and I think this is important for all the proposal sites in Whitton. Hampton Hill seems to have several business parks behind the High Street, but Whitton doesn't have even one. More employment space would bring more people into the High Street. And Whitton has better transport links than most parts of the borough.</p>

WT 2 Iceland Store, 26-30, High Street, Whitton

Detailed comments – where respondent objecting to it:

Ref. no.	Name/Organisation	Comment
8	Neil Wilton	<p>Whilst I concur in the principle adopted to relocate Whitton Library (WT1) to a suitable High St site for positive reasons, it is my view that W2 Iceland Store 26-30 High St is not appropriate and should not be included in its current form for the reasons below:</p> <p>1)The Iceland store is only part of a 1965 built building, with three other businesses in 16-24. Whilst it is possible to demolish part of the building it is an integrated structure, like it or not and that would not sit well between two buildings designated as BTM- the Admiral Nelson PH and 34-36 High St(as well as 38-48). You would have the juxtaposition of 1960's architecture and a new build to reflect (echo?) the 1930's architecture generally.</p> <p>2)The rear car park is not exclusive to Iceland and its customers but all four businesses fronting it, for servicing/deliveries, some customer parking. If that was built over, depending on the footprint proposed and a significant one would be needed to allow for the community facilities ,that puts parking pressure on the Library car park adjacent as well as the High St and surrounding residential roads. The freeholder of 34-36 has a legal registered right of way across the car park to its exit on Nelson Rd,which is another constraint.</p> <p>3)Iceland is a major brand retailer with significant footfall that helps to support the High St generally. Any loss of this, even if subsequently relocated in a potential retail development that would be 'gained' would be of serious concern to all retailers, particularly the many independent traders that we enjoy on our High St. This is designated Key Shopping frontage (24-30) for very good reasons.</p> <p>4)The local authority has been slow over the years with the sites @ 38-48,when derelict and for sale and the garage/showroom @ 53-55 being redeveloped that were 'available' for relocation of the Library etc without any risk of compromising footfall.</p> <p>5)All things being equal and risks to footfall mitigated, if the whole site Nos 16-30 High St were to become available by 2029,subject to existing leaseholders consent and freehold sale by a private individual, whom I doubt would sell, my view would be, that would be the optimum position to relocate library and community facilities within a comprehensive mixed scheme.</p> <p>6)Point 5 is a far more logical and rational integrated proposal dealing with the whole site and removing the significant constraints</p>

Ref. no.	Name/Organisation	Comment
		<p>on just Nos 26-30 would impose so the whole frontage would have the same treatment to reflect or compliment the 1930's heritage. This could have some parking element to the rear, particularly disabled persons provision and a 'drop-off' point for the less mobile. But I do not see this site has according to you own criteria 'a reasonable prospect of coming forward by 2029'.</p> <p>7)There are no other suitable sites on the High St Whitton given the requirement for the mixed development and the brief outlined.</p>
148	Edward Landor, <i>eLANDOR</i> associates on behalf of Iceland Foods Limited	<p>We act on behalf of Iceland Foods Limited and herewith object to the identification of Site WT 2 for mixed town centre uses, residential and affordable residential units, retail or service and new library in the Site Allocations Development Document as referred to in paragraph 2.7.14 on page 31 and paragraph 3.6.2 on pages 73 and 74.</p> <p>Iceland Foods Limited supports Option A which is to retain the status quo as referred to on pages 144-145 of the Sustainability Appraisal to the Site Allocations Development Plan Document. Our client objects to Option B to redevelop the site as described on pages 145-146 of the Sustainability Appraisal.</p> <p>The objection to the proposed allocation of the site for a new library and residential development is not supported on national, regional or local planning policy grounds for the reasons set out below.</p> <p><u>Location and Premises</u></p> <p>Iceland's foodstore at 26 – 30 High Street is a modern retail unit comprising 435m² of gross retail floorspace. The store was fully refitted in 2002 and again 2007 at a combined cost of £270, 000. The store employs 25 staff.</p> <p>The store is in a highly sustainable location in Whitton district centre and is accessible by a variety of modes of transport. The majority of its customers arrive at the store on foot or by public transport. It attracts 5,300 customers a week equivalent to 275,600 customers per annum. The sustainable pattern of food shopping offered by this store is enhanced by a free home delivery service available to all customers spending £25.00 or more per visit. Groceries are delivered to a customer's homes at a time to suit.</p> <p><u>National Planning Policy Framework</u></p> <p>The National Planning Policy Framework (NPPF) recognises that maintaining "the viability and vitality" of town centres is essential to sustaining the fabric of local communities.</p> <p>Paragraph 23 of NPPF identifies that Local Planning Authorities should:</p> <p><i>"Promote competitive town centres that provide customer choice and a diverse retail offer and which reflect the individuality of town centres"</i></p> <p>The Iceland Food store makes an important contribution to the convenience retail offer of Whitton. There are a total of 3 foodstores in Whitton High Street, including Iceland. The only other supermarket in the High Street is a Tesco Metro. The other food store is a specialist retailer, the "Good health Shop".</p> <p>Should the site be redeveloped and the store extinguished, it would diminish the convenience retail offer and adversely impact on the viability and vitality town centre contrary to national planning policy objectives.</p> <p><u>London Plan 2011</u></p> <p>Policy 4.7 of the London Plan 2011, Retail and Town Centre Development, identifies that a "vibrant, diverse retail sector is essential to London's success. Paragraph 4.47 confirms that:</p> <p><i>"Not only is it vital to ensuring that Londoners have access to the goods and services they need, but it plays a key role in London's economy, employing over 400,000 people¹ and supporting the economic vitality and health of the whole range of town centres".</i></p>

Ref. no.	Name/Organisation	Comment
		<p>This is reiterated in paragraph 4.42 which states: “Convenience retail expenditure is expected to increase by 1.5 per cent per annum between 2006 and 2031. It is estimated that London will require an additional 0.1–0.3 million sq m convenience retail floorspace in gross terms by 2016.....”</p> <p>The London Plan recognises the vital role provided by small supermarkets, such as this Iceland store, in terms of supporting sustainable shopping patterns. This is because they form a denser network and are particularly accessible by walking and cycling as well as public transport. The availability of accessible local shops are seen as important in securing ‘lifetime neighbourhoods’– places that are welcoming, accessible and inviting to everyone regardless of age, health or disability and which provide local facilities available to all.</p> <p>Should the store be extinguished and the site redeveloped as proposed, it would be contrary to the policies of the London Plan which is to maintain and increase convenience floorspace levels in established centres. Furthermore, the London Plan affords special protection to convenience stores in district and local centres which help underpin sustainable shopping patterns and secure “lifetime neighbourhoods”.</p> <p><u>Local Development Framework</u></p> <p>The adopted Local Plan for the area comprises the Core Strategy (adopted 2009) and Development Management Plan (adopted 2011). Whitton is defined as a district centre in the Core Strategy.</p> <p>The Development Management Plans identifies that the Iceland store is located in the town centre boundary as defined by Policy DM TC 1. The store is also situated in an area defined as a Key Shopping Frontage. In such locations, Policy DM TC 3 identifies that proposals which result in a loss of retail space will be positively resisted by the Council.</p> <p>The proposal to allocate the site occupied by the store for redevelopment purposes to accommodate a library and affordable housing is contrary to adopted policy. The policies of the Development Management Plan carry full weight.</p> <p><u>Loss of Employment</u></p> <p>The extinguishment of the store will result in the loss of 25 jobs. These will not be replaced by development proposals which include a library, which already exists, housing and open space. The Sustainability Appraisal suggests that any redevelopment site can address the current open space deficiency in this location.</p> <p>The combination of uses proposed for site WT 2 will result in a net loss of employment.</p> <p><u>Feasibility</u></p> <p>The Iceland store is part of an urban block which includes 30-18 High Street. The store is not a standalone building and therefore can never provide a redevelopment opportunity in isolation.</p> <p><u>Conclusion</u></p> <p>Site WT 2 is occupied by an Iceland store which has been subject to two re-fits since 2002. It is a modern convenience store occupying premises which are fit for purpose. There is no regeneration imperative justifying redevelopment. The extinguishment of his store will result in a loss of jobs and harm the vitality and viability of the Whitton district centre.</p> <p>Furthermore, paragraph 2.7.14 of the Site Allocations Plan identifies that the purpose of displacing Iceland is solely to facilitate the co-location of existing library provision in the Borough. The proposal is not supported by any robust test of need or alternative site strategy.</p> <p>The site is located within the town centre/district centre boundary as defined by the adopted Local Development Framework. It is also in a designated Key Shopping Frontage where the Council will resist changes from retail use. The proposal to extinguish the present retail use, and redevelop the site with a new library, mixed uses, housing and open space is contrary to adopted policy. This policy has been tested at Public Examination and carries full weight.</p>

Ref. no.	Name/Organisation	Comment
		Proposal WT 2 is not in accordance with the adopted plan. The purpose of the development plan is to provide certainty for owners and person with an interest in land and property. The conflict of Proposal WT 2 with established policy creates uncertainty, and as a consequence Iceland is likely to defer future investment in the store. The retail function of the site is supported by NPPF and the London Plan. The retention of convenience floorspace in sustainable locations is a key objective of the London Plan which aims to encourage lifetime neighbourhoods. On any reasonable assessment, the allocation of site WT 2 should be withdrawn.
144	DE & J Levy LLP on behalf of Mr Gerald Green	At this stage our client objects to proposals to re-allocate the land use and will be providing further evidence in support of this
175	Cllr Liz Jaeger	There are no GP surgeries in Whitton Ward. The opening of the new health and social care centre on Percy Road involved the relocation of the Jubilee Avenue surgery, which was the ward's closest surgery. Possibly there is an argument to be made for some of the WT1/WT2 space to provide a surgery. I have spoken informally to both Dagmar Zeuner and Colin Bradbury about this. I will follow this up and let you know whether there is a case for this.

WT 3 Kneller Hall Telephone Exchange, Ashdale Road, Whitton

Detailed comments – where respondent supporting it:

Ref. no.	Name/Organisation	Comment
8	Neil Wilton	I would welcome WT3 being incorporated into the site allocation DPD for potential residential use
108	Bridget Clements, Whitton Business Association	The Whitton Business Association has no objection to development on the telephone exchange site.
175	Cllr Liz Jaeger	The telephone exchange should be earmarked for employment use. However, it sounds like this one is going to be removed from the list because BT have no intention of moving out

Detailed comments – where respondent objecting to it:

Ref. no.	Name/Organisation	Comment
3	Hilary Bishop, Telereal Trillium	There would be no possibility whatsoever in the foreseeable future (beyond say 2025) to dispose of any one of the three sites in Richmond. Theoretically it would be possible to redevelop the sites but the costs in trying to vacate the exchanges runs into the hundreds of thousands and BT are not able to offer the buildings at present. Please remove them due to undeliverability.

WT 4 Whitton Station, High Street, Whitton

Detailed comments – where respondent supporting it:

Ref. no.	Name/Organisation	Comment
32	Dr Anthony Dempsey	The condition of the station is appalling and gives a bad impression. The proposals to have a lift and extended canopy and better drop off facilities are essential and urgent.
170	Sarah Considine, Greater London Authority	Improvements to the station are strongly supported by TfL, in line with London Plan Policy 6.4.
8	Neil Wilton	I would welcome WT4 Whitton Station with interchange improvements as well as affordable housing, to be incorporated, a change from the draft proposal.
175	Cllr Liz Jaeger	The redevelopment of the station, in employment terms, could go beyond a cafe and kiosk.

Sites in Barnes

BA 1 Barn Elms, Queen Elizabeth Walk, Barnes

Detailed comments – where respondent supporting it:

Ref. no.	Name/Organisation	Comment
133	Dael Greetham, Sport England	support - site policies should specifically state that the existing sports facility provision will be protected:
170	Sarah Considine, Greater London Authority	<p>This site was the subject of a strategic planning application in 2010 (our ref: D&P/0279a/01). It is noted that the site allocation supports provision of an indoor sports hall, although it is not clear whether this would be in addition to the sports pavilion proposed as part of the submitted application.</p> <p>The GLA supports the enhancement of sporting provision at this site, in accordance with London Plan Policy 3.19. However, whilst the stated aims of rationalising development at the site, and minimising visual impact/impact on open appearance, are supported, the site allocation should specifically acknowledge the Metropolitan Open Land designation, and the requirement for any development proposed on Metropolitan Open Land to accord with London Plan Policy 7.17, and associated national guidance within the National Planning Policy Framework.</p>

Detailed comments – where respondent gave no indication if supporting or objecting:

Ref. no.	Name/Organisation	Comment
34	James Page, Richmond and Twickenham Green Party	Any development should exclude the area in and around the lake, which is almost uniquely undisturbed.

BA 2 Barnes Hospital, South Worple Way, Barnes

Detailed comments – where respondent gave no indication if supporting or objecting:

Ref. no.	Name/Organisation	Comment
36	Peter Udell	<p>I live off South Worple Way in Lodge Avenue, which faces Barnes Hospital across Mortlake Burial Ground. I park my vehicle in South Worple Way, as do my neighbours.</p> <p>I have these concerns about any possible redevelopment of the Barnes Hospital site.</p> <ol style="list-style-type: none"> 1. Because some of South Worple Way is too narrow for lorries and even for some vans to negotiate without damaging parked cars, I believe it is essential, during any construction work, for all contractors' vehicles to access the site along South Worple Way from White Hart Lane, and not along South Worple Way from the west. 2. Because there is so little parking for local residents, I believe it is also essential, during any construction work, for all contractors' vehicles to park on site and not in any part of South Worple Way. 3. For the same reason, I believe it is essential, during any construction work, for there to be no restrictions on parking for local residents outside the Barnes Hospital site. 4. Because so much of the parking along South Worple Way is occupied by commuters who use Mortlake station, as well as by some commercial firms, I believe it is essential, in whatever redevelopment plans there may be, for adequate parking to be provided within the site. 5. This parking would, I suggest, need to be for all residents of any houses or flats that may be built, and for their visitors. It would also, I suggest, need to be for all users of any non-residential buildings that may be put up, and for their visitors.
46	Richard Parish for English Heritage	<p>As above, the justification would benefit from clarification in respect of the sites relationship to the adjacent Queen's Rd, Mortlake, conservation area, design policies and clarification of extent of "retention of the most important Buildings of Townscape Merit".</p> <p>Given the potential complexity of the site has thought been given to producing a site design brief which identifies the existing context and design parameters?</p>
84	Mary Smith	<p>I saw the notices regarding the potential redevelopment of the Barnes Hospital Site, should the site be considered as surplus to requirements in the future.</p> <p>Although I note that any such redevelopment would be subject to transport impact assessments, I did want to raise the following general points at this stage:</p> <ul style="list-style-type: none"> - Any such redevelopment would cause an increase in the already heavy volume of traffic using South Worple Way and White Hart Lane, including the volume of dangerous heavy goods vehicles during any construction; - South Worple Way is narrow and not suitable for two way traffic - the narrowness was demonstrated last weekend when a small delivery lorry got stuck and blocked the road. The police needed to be called to attend and assist with its removal; - White Hart Lane is not suitable for large goods vehicles due to narrowness with vehicles parked on either side of the road; - The turning from South Worple Way onto White Hart Lane is already a dangerous junction due to: <ol style="list-style-type: none"> A) vehicles coming over the level crossing and turning right, causing traffic to back up over the level crossing and sometimes dangerously into the box junction and B) when traffic is backed up on White Hart Lane on the south side of the level crossing, vehicles often accelerate on the outside of the queue on the wrong side of the road to try and turn down South Worple Way prior to the level crossing barrier lifting. <p>We believe that these potentially dangerous driving practices will only increase in volume if there was any large redevelopment of the site; and</p> <ul style="list-style-type: none"> - Any large redevelopment would also cause further congestion to the already busy South Circular along Upper Richmond Road.

E BA 3 Glenthams Road, Barnes

Detailed comments – where respondent gave no indication if supporting or objecting:

Ref. no.	Name/Organisation	Comment
46	Richard Parish for English Heritage	As the proposed site is a proposed Key Employment Site within the Castlenau conservation area it would be useful to state whether the buildings are considered to make a positive contribution to the character and appearance of the conservation area. The conservation area appraisal refers to high quality terraces and small Victorian Cottages, as the buildings identified appear to be of a different typology it would be useful to establish up to date design and principles for these buildings should modification to retain them in Employment use be considered.
174	Paul Zieleniewski	<p>To provide some context, Nos 64-66 and Nos 76-82 Glenthams Road are within my company's ownership. As at writing, both 78 and 80 Glenthams Road, representing approximately 30% of the floorspace owned by me in Glenthams Road, is currently vacant and has been so for some considerable time despite the active efforts of our agents, Featherstone Leigh. The lawful use of these two properties is B1(a) office use.</p> <p>It is understood from the draft Site Allocations document that the London Borough of Richmond (LBR) is now seeking to designate the site at Glenthams Road, which includes residential properties, as a Key Employment Site. I wish to object to this on a number of grounds which I outline below.</p> <p>First, I have experienced significant difficulty in letting the units 78 and 80 Glenthams Road in recent times despite these properties being in a reasonably good state of repair and decoration and a willingness on my part, as landlord, to offer competitive letting terms. In the past five years I have only managed to arrange two temporary lettings lasting only one year each plus a recent short term let to a charity in 2013 on a rent-free basis. This is contrary to the evidence base site assessment which sets out that the buildings are fully occupied on commercial terms. Further speculative works are unviable as commercial agents have advised that additional capital expenditure would not assist in letting the properties given that the site, in structural terms, is well beyond its useful life. You will note in this regard the planning application made prior to 1990 by the former owner, Orlinworth Plc, to demolish and redevelop all the buildings at the end of Glenthams Road and replace it with a residential development tailored to the site and better suited to its conservation area setting. This application was refused which led to the somewhat piecemeal conversion of the buildings seen in evidence today.</p> <p>Second, my own trading business was situated at 64/66 Glenthams Road for many years and I know from personal experience the difficulties faced by both landlords and occupiers. The road is not easily accessible to commercial traffic; Hammersmith Bridge has width restrictors; the entrance road into Glenthams Road (St Hilda's) is very restricted as I found out to my own cost on many occasions when arranging deliveries or collections. It is virtually impossible now to arrange even small container deliveries so factory-style operations requiring larger commercial vehicles are a non-starter because of the access and parking difficulty. Carfax Cards, the occupier at No 76, would be the only remaining example of an industrial occupier but their end product - business cards - is distributed by small vans and they have an access point on Lonsdale Road anyway. Many business owners would not wish to operate within the confines of an area which is predominantly residential. I myself was forced to sub-contract part of my own mail order</p>

Ref. no.	Name/Organisation	Comment
		<p>trading operations away from Glenthams Road after 1990 for these very reasons of impracticality.</p> <p>Paragraph 22 of the NPPF is relevant in this instance. It clearly outlines 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 that purpose in the future. Instead the 'presumption for sustainable development' that is emphasised throughout the NPPF stresses the need for flexibility.</p> <p>Third, the draft Site Allocations DPD recognises the need for employment sites within the borough to be viable (Paragraph 2.4.3) and it is accepted that the loss of some office floorspace where poorly located and without demand is inevitable (Paragraph 2.4.6). Paragraph 2.4.5 clearly outlines the intended purposes of Key Employment Site designations to protect 'larger employment areas, generally industrial estates and areas of mixed employment which are suitable for retention' rather than floorspace of the unplanned, piecemeal nature of that found at Glenthams Road.</p> <p>Four, It is significant to note that No 72 and the group of four maisonettes at 74 Glenthams Road are all included within the proposed Key Employment Site boundary despite all of these buildings being long term, residential dwellings in separate ownership. The same comment applies to portions of back garden land belonging to villas in Lonsdale Road, which abut Glenthams Road and therefore lie too within the designated BA3 boundary. Furthermore, all recent developments along the south west of the road have incorporated change of use elements in the approved application to permit new residential development. The current flat conversion at No 50 Glenthams Road and the 'Ecohouse' dwelling at No 58 being recent examples. There are at least two others in the pipeline. Site BA3 cannot therefore be accurately regarded as a single, integral key employment site, but rather as a collection of individual commercial buildings interspersed with residential development. By no stretch, therefore, does BA3 constitute a cohesive employment site.</p> <p>Moreover, Paragraph 158 of the National Planning Policy Framework (NPPF) requires that local plan documents are based on 'adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of an area.' The paragraph continues by setting out that local planning authorities should 'take full account of relevant market and economic signals'.</p> <p>Taking account of the above, the blanket approach adopted by LBR towards the protection of employment sites within the borough is unjustified, resulting in the stifling of sensible, sustainable development of brownfield sites including residential development. It is strongly arguable that the residential setting of Glenthams Road and its conservation area status would suggest a continuation of the present direction of travel back toward residential development. This was presumably how the road was originally envisaged prior to the sporadic building of commercial premises in the back gardens of those Italianate villas that line Lonsdale Road to the south.</p> <p>To summarise:</p>

Ref. no.	Name/Organisation	Comment
		<p>Site BA3 is unviable and unsustainable for retention in employment use; The proposed designation of Site BA3 as a Key Employment Site is contrary to national planning policy; The proposed designation of Site BA3 as a Key Employment Site is unjustified and not based on adequate and up-to-date evidence;</p> <p>In light of the above, the draft Site Allocations DPD in respect of its proposed allocation of site BA3 as a Key Employment Site cannot be considered to meet the tests of soundness as required by the NPPF.</p>

Possible additional sites in Barnes suggested by respondents:

Ref. no.	Name/Organisation	Comment
103	John N. Smith, CgMs on behalf of the Mayor's Office for Policing and Crime	<p>Proposed new site NEW SITE - BARNES GREEN POLICE STATION, 96-102 STATION ROAD, SW13 0NG (see attached site plan) PROPOSAL Residential JUSTIFICATION The site comprises a 3 storey building with basement car park on a corner plot at the junction of Station Road and Beverley Road, Barnes, in a sustainable location close to the existing facilities of the local centre and is well served by public transport. The building served as a police office. The services within it have either been re-provided elsewhere or are no longer required following a change in service provision and a rationalisation programme as set out in the MOPAC Police and Crime Plan and Estate Strategy. Redevelopment for residential use will enhance the conservation area and improve the amenities of residents. Any proposal would need to consider flood mitigation measures due to its location within flood risk zone 3a. The design and layout would need to reflect the character of the surrounding area and protect neighbour's amenity.</p>
168	Hayley Phipps, Nathaniel Lichfield & Partners on behalf of The Harrodian School Limited	<p>Proposal Site, Harrodian School, Barnes (Comments on Main Plan and Sustainability Appraisal): Changes Required The boundary of the MOL should be altered as shown on the attached plan to exclude the western part of the Harrodian School site. The Current Position The Harrodian School is a private fee paying school in Barnes that attracts pupils for entry at pre-preparatory (ages 4 to 7), preparatory (8 to 12), senior (13 to 15) and sixth form levels (16 to 19). The use of the site was originally granted permission for a non-residential day school in 1993, restricted to 450 pupils. Planning permission was granted in 2011 to allow up to 1,000 pupils to attend the school. The school has expanded over the years to accommodate the increased numbers of pupils. The expansion of the school is testament to its great success and the important needs it provides for residents of the Borough and beyond. As an important education provider and employer in the Borough, the school looks to policy in the adopted and emerging statutory development plan to guide and support its continued success and to help it in meeting the on-going needs of its pupils and their families.</p>

Ref. no.	Name/Organisation	Comment
		<p>Currently, the entire school site is located with Metropolitan Open Land (MOL) on land which in our view doesn't meet any of the criteria set out in policy for designating land as such. Any change in status is subject to a review of the development plan and therefore during the Launch Issues Stage and Call for Sites (December 2012/January 2013), Dalton Warner Davies submitted representations on behalf of the School requesting the MOL designation on the entire school be removed.</p> <p>The Council has so far failed to consider this request properly and hasn't made any assessment of the site against the reasons for designating land as MOL which must be the starting point for any such assessment. The current MOL policy designation on the site places a very significant constraint on the School and its ability to provide for the needs of the community it serves. National policy within the NPPF attaches the same level of importance - "great importance" - to both the protection of MOL and to ensuring that a sufficient choice of school places is available to meet the needs of existing and new communities.</p> <p>It is against this national policy background the School now seeks further discussions with the Council over establishing a new policy position on this site which seeks to fairly balance the future needs of the School with its existing designation within the MOL. In doing this we make reference to nearby St Paul's School where a similar arrangement works successfully.</p> <p>The Council's currently stated view is that applying existing adopted policies to assess the need for any further educational facilities on this site is considered the best way forward in terms of meeting educational needs. This is flawed insofar as it is those very policies which place unreasonable constraints over the school to provide for those needs; needs to which "great importance" must be attached according to the NPPF. As it currently stands the Council's response is not consistent with the national policy which in our view requires a balance to be struck between two issues which are both of great importance. The plan hasn't been positively prepared as educational needs haven't been properly assessed and provided for and lastly the Council's response isn't justified as the alternatives haven't been properly or fully assessed.</p> <p>The Policy Position</p> <p>It is noted in paragraph 79 of the NPPF that the Government attaches 'great importance' to Green Belts and therefore the same importance must be attached to MOL. The NPPF states that Green Belt, and by extension MOL, should only be altered in exceptional circumstances through the preparation or review of the Local Plan. It is our view that such exceptional circumstances exist at this time arising from changes in policy at national level in relation to providing for a sufficient choice of school places and how this specifically relates to the future of Harrodian School. The Local Plan is being reviewed and therefore it is the appropriate time to take these matters up with the Council.</p> <p>Paragraph 72 of the NPPF also attaches 'great importance' to ensuring a sufficient choice of school places is available to meet the needs of existing and new communities. The level of importance ascribed in the wording is as the same as that attached to MOL. It states that LPAs should take a proactive, positive and collaborative approach to meeting this requirement and to development that will widen choice in education. To do this, LPAs should give 'great weight' to the need to create, expand or later schools. The Council hasn't had regard to this policy in its consideration of the matters raised in the previous representations.</p> <p>When boroughs are considering the designation of land as MOL consideration must be had to policy in the London Plan (Policy 7.17). To designate land as MOL boroughs need to establish that the land meets at least one of the following criteria:</p> <ul style="list-style-type: none"> (a) It contributes to the physical structure of London by being clearly distinguishable from the built up area (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 (c) It contains features or landscapes (historic, recreational, biodiversity) of either national or metropolitan value (d) If forms part of a Green Chain or a link in the network of green infrastructure and meets one of the above criteria. <p>The requirement of boroughs to have consideration to these criteria when deciding whether to designate land as MOL extends to determining whether or not to alter or remove an MOL designation. These criteria were not considered by the Council when they</p>

Ref. no.	Name/Organisation	Comment
		<p>were assessing whether the MOL boundary at Harrodian School should be altered further to the previous requests made by the school.</p> <p>Policies in both the London Plan (Policy 3.18 and Policy 3.19) and Richmond's Core Strategy (Policy CP18) and Development Management DPD (Policy DMSI 1) supports development that will enhance education and skills provision and to ensuring the provision of schools, preschools and other education and training facilities are sufficient in quantity and quantity to meet the needs of residents. Policy CP18.B of the Core Strategy states that the potential of existing educational sites will be maximised through redevelopment, refurbishment or re-use to meet educational needs. There is therefore recognition in policy at all levels that educational sites may need to respond to educational needs through new development.</p> <p>Local Context</p> <p>St Paul's School, another fee paying private school, is located to the north of the Harrodian School further along Lonsdale Road. St Paul's School is also a successful school and major employer in Barnes serving the education needs of the local community that it serves. St Paul's School is also subject to an MOL designation although importantly not on the entirety of the school site. The school fields are designated MOL but the school buildings and spaces around these buildings are excluded from the MOL designation. This enables the school to plan positively to meet important educational needs of the community it serves whilst also providing greater certainty for all those in the planning process including the Council and local residents who are affected by its operation. It appears that the St Paul's School buildings were excluded from the MOL designation in the 1985 Richmond Local Plan. The entirety of the Harrodian School site (although not in use as a school at this time) appears to have been included in the MOL at this time. It is worthy of note that by excluding part of the St Paul's site from MOL it has effectively separated the playing fields on either side of it that remain in the MOL. Built development outside the MOL extends from Lonsdale Road northwards and includes the houses on Lillian Road and Glenthams Road plus the school buildings which extend up to the River Thames. Similarly, immediately to the east of Castelneau the continuous swathe of MOL land is also severed by the residential development which is excluded from the MOL and extends south to the London Wetland Centre. The somewhat disjointed nature of the MOL in this respect is a common feature reflecting historic development patterns and the demands placed on providing for the needs of a densely populated area.</p> <p>When looking at how the Council has previously dealt with MOL designations and schools, it is worthy of note that the Inspector's Report for the 1996 Unitary Development Plan. At this time, boundary changes to MOL designations were considered by the Council and agreed for St Mary's College and St Eleanor Holles School to allow the schools to '<i>make reasonable provision for future needs</i>'. The Council has therefore previously taken a considered approach to MOL designations for schools. The MOL designation on the Harrodian School site was adopted some 8 years prior to the site being used as a school. It is therefore entirely reasonable to request that the Council re-considers the MOL designation in line with the approach it has previously adopted for educational uses elsewhere in the Borough to make for reasonable provision for the future needs of Harrodian School and its pupils and parents.</p> <p>Reasons</p> <p>When considering the previous request to remove the Harrodian School from the MOL, the Council should have had consideration to the London Plan criteria for designating land as MOL and the future education needs of the Borough (and the role the School plays in this) in order to establish whether exceptional circumstances exist for alteration to the boundary. Once this is complete, the options arising out of that analysis should then have been the subject of a Sustainability Appraisal in the usual way. The approach taken thus far in its assessment of this matter has not followed this route and is therefore flawed. The site needs to be assessed against the four stated criteria in London Plan Policy 7.17.</p>

Ref. no.	Name/Organisation	Comment
		<p>The site doesn't include open air facilities which serve the whole or significant parts of London (criteria d); nor does it contain features or landscape of either national or metropolitan value (criteria c). It doesn't form part of a Green Chain or a link in the network of green infrastructure and therefore criteria (b) doesn't apply. With respect to criteria (a) Lonsdale Road provides a clear separation between the well-established built-up residential areas of Barnes on its eastern side and the far more open and far less developed areas forming part of the river corridor to the west. The eastern edge of Lonsdale Road is built up along its entire length except for the appeal site which has an open aspect but clearly forms part of the school grounds of which it forms a part. Indeed the school car park is situated between the appeal site and Lonsdale Road. Just over a half of the school frontage to Lonsdale Road is built-up with the remainder forming the school car park.</p> <p>The school site forms part of the residential area of Barnes surrounded on three sides by housing. Its western edge is defined by the busy Lonsdale Road beyond which is the Leg of Mutton reservoir. The school site essentially forms a relatively small extension of the MOL within the built-up residential area of Barnes. It is the only part to extend over Lonsdale Road. It doesn't form part of the continuous corridor along the river but is an adjunct to it. It is not clearly distinguishable from the built up area in terms of Policy 7.17D(a) but rather it sits within it. In our view the school site meets none of the reasons for designating land within the MOL. The extent to which the Council can take issue with this can only relate to criteria (a) as no case can be advanced for the other criteria. If the Council disagrees with our assessment against criteria (a) then that must be considered against the needs giving rise to this request for an alteration to the boundary and our alternative proposition set out below for your consideration.</p> <p>The Council is well aware of the needs of the School including two applications it has refused relatively recently comprising one for a Sports Hall, the other for a single storey roof top extension to the Senior Block, both on the western half of the school site. The requirement for the School to expand is well documented and as far as the Sport Hall is concerned, the principle of the need has been accepted by the Council. Both applications were opposed by the Council on MOL grounds.</p> <p>The needs of the school arise out of the deficiencies in existing education provision and from a need to expand school numbers to provide for the needs of the existing school roll (from an increasing number of pupils wishing to stay onto the sixth form). The school quite rightly wishes to provide for the needs of its existing and future pupils and their parents in a way that also enables it to compete effectively with other similar establishments, including St Paul's mentioned above. The aims and aspirations of the School in this regard are supported by planning policy at all levels; indeed the NPPF places the same level of importance on them as protection of the MOL.</p> <p>We note the position of the Council that the entire school site should remain within the MOL which in turn responds to the previous request by the school that the whole of it should be removed.</p> <p>In light of the situation that has been reached we therefore wish to suggest an alternative approach which seeks to balance the needs of the School with the Council's desire to maintain the MOL designation. This offer is made notwithstanding our view that when considered against London Plan Policy 7.17 a clear case can be made for removal of the whole site from the MOL.</p> <p>We therefore request that the western side of the school site including existing buildings, tennis courts, all weather pitch and car park is removed from the MOL designation with the playing fields on the eastern half remaining within it. This would follow the approach adopted at St Paul's where the school fields are with MOL but the school buildings are not. This would maintain the MOL designation on the larger eastern part of the School site which is wholly open. Whilst we dispute the extent to which there is any effective linkage between the School site and the MOL to the western side of Lonsdale Road (around the Leg of Mutton reservoir) the relationship of the two would be maintained in the same way as the MOL currently bounds either side of the St Paul's School buildings.</p> <p>Our client is devastated at just how difficult it has become to provide for the needs of its pupils and making Harrodian School a</p>

Ref. no.	Name/Organisation	Comment
		<p>viable proposition for the children. It is a major employer in Barnes and plays an active role in the wider community. Planning policy must serve to support this school and balance its needs against wider planning policy objectives. If the school remains at a disadvantage to others like it and cannot meet the needs of the pupils, then its closure would mean those needs would have to be met elsewhere in the Borough and place a huge additional burden on infrastructure that probably cannot sustain it. The school is seeking the Council's cooperation on this very important matter. Our view is that this compromise between us would represent a reasonable and balanced application of policy at all levels which relates to protecting MOL and providing for future education needs. As it currently stands, the correct balance hasn't been struck and the plan is unsound as a result.</p> <p>Sustainability Appraisal</p> <p>When comparing the Sustainability Appraisal the Council has undertaken for Option A (retain status quo) and Option B (alteration of MOL boundary), all 15 SA Objectives were scored 'neutral' for Option A and 11 out of 15 scored 'neutral' for Option B. Option A could however have potential negative impacts on SA objectives 3 (travel), 4 (climate change mitigation), 5 (climate change adaption), 11 (health and well-being), 12 (accessible local services) and 14 (local economy) if the needs of the school cannot be met on site. The four SA Objectives that were not scored 'neutral' for Option B related to biodiversity, landscape/townscape, parks & open space and accessible local services. These were all scored negatively against geographic scale, assessment/length of effect and cumulative criteria except accessible local services, which scored positively. The summary of the assessment states that removing the MOL designation would <i>'allow for even further development on this land'</i>. In the conclusion, the Council acknowledge that the MOL designation <i>'...may limit the expansion of the school, however, not including this site in the Site Allocations Plan and applying existing adopted policies to assess the need for any further educational facilities on this site would be considered the best way forward in terms of meeting educational needs'</i>. This assessment and conclusion is not objectively carried out and therefore flawed. The Council has failed to recognise that altering the MOL designation would result in significant positive SA effects when compared with Option A. For example, in relation to travel and climate change, if the education needs of more residents could be met locally at Harrodian, this would reduce the need for pupils and parents to travel to other facilities/locations removing car journeys from the local road network and pollution from the local environment. Similarly this option would score positively on health, well-being, secure communities; accessible local services; and local economy. Removing the entire school, or a part of it, from the MOL will not <i>'allow more development on the land'</i>. Development proposals would still require planning permission ensuring the Council retains control over what development is considered acceptable and subsequently approved. The negatively scored criteria relate to SA Objectives the Council would still retain control over assessing and would consider each application on its own merits.</p>

Sites in East Sheen and Mortlake

EM 1 Stag Brewery, Lower Richmond Road, Mortlake

Detailed comments – where respondent supporting it:

Ref. no.	Name/Organisation	Comment
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Ref. no.	Name/Organisation	Comment
138	Francine Bates, Mortlake Brewery Community Group	<p>Broadly the Group is very pleased that you have identified specific proposals for the development of the Stag Brewery site and that you have broadly confirmed the Development Brief previously approved by the Council.</p> <p>We are particularly pleased that you have highlighted the need for affordable housing as part of any housing development and that the site could also cater for health needs of population. We assume and hope that this will include provision of new NHS health facilities for Mortlake which are currently sorely lacking.</p> <p>We welcome the Council's continued commitment to preserving the buildings of townscape merit, notably the Bottling Plant and the Maltings Building. We also welcome the intention on the part of the Council to ensure that the site will encompass community use. We were disappointed to see that the plans do not include specific mention of a "community hub" where local residents and groups can meet and access activities and services and would very much like to see that inserted.</p> <p>As you know the Group is very keen on utilising the Maltings building for the use of the community if this were financially viable. We are still keen to explore this possibility with the Council, the Brewery and potential developers of the site.</p> <p>We believe that the plans contain two other omissions:</p> <p>The Green space link mentioned needs to specify that this should be from Mortlake Green providing direct access to the river</p> <p>There is no specific prohibition on "ribbon" housing development along the river only a reference to taller buildings being at the core of the site.</p> <p>I hope that these can be added into the proposals.</p>
172	Murray Hedgecock	<p>I attend meetings of the Mortlake Brewery Community Group as representing the Barnes and Mortlake History Society, which has an obvious interest in seeing that redevelopment in due course of the Mortlake Brewery site should pay full attention to its significance, making the very best use of a site of major historic interest.</p> <p>Both in this capacity and as a local resident, I agree strongly with the proposal that a "green link" should be developed by providing direct and highlighted access to the River Thames from Mortlake Green – itself a place of considerable history.</p> <p>The proposal for a community hub for Mortlake is something I very much support, specifically hoping that The Maltings be made available for a range of uses by local people so that its historic past – even if dating back only a century – should be recognised.</p> <p>The Group also urges that no "ribbon development" be allowed along this stretch of the river, while recognising that it is more or less wasted in its present condition, and much better use could be made of it in providing community facilities and amenities.</p>

Detailed comments – where respondent objecting to it:

Ref. no.	Name/Organisation	Comment
133	Dale Greetham, Sport England	<p>Sport England objects to the potential loss of existing sports facility provision at the below sites. These site policies should specifically state that the existing sports facility provision will be protected:</p> <p><u>Objection</u></p> <p>Protection of playing fields for sport</p> <p>Planning Policy Objective 6 aims to ensure that there is no further reduction in the supply of conveniently located, quality playing</p>

Ref. no.	Name/Organisation	Comment
		fields for sport to satisfy current and likely future demand. Sport England will normally oppose development that would lead to the loss of, or prejudice the use of, all or part of a playing field, without meeting at least one of the specific exception criteria identified in Sport England's policy 'A Sporting Future for the Playing Fields of England' (1997), a copy of which can be downloaded from our website at http://www.sportengland.org/facilities-planning/planning-for-sport/development-management/planning-applications/playing-field-land/ . The above mentioned site would therefore fail the tests of soundness.
163	Mark Worledge	Site Allocations Plan: Site number EM1 (Stage Brewery) - Section 3.8 Specifically, Section 3.8.1 (referring to "retained playing fields") and the "Proposal" section directly under 3.8. 1. Section 3.8.1 refers to "retained playing fields". This is welcome, but inadequate. The Development Brief previously prepared by the Council (and still extant) refers to the retention of the playing fields on the site (the Williams Lane playing fields) being retained in their current location, and that more specific wording should be used in this Site Allocations Plan also. As the Council's website refers (http://www.richmond.gov.uk/planning_and_development_mortlake.htm): "Mortlake Green and the playing field at Williams Lane are also protected open land."2. The summary of the "Proposal" is good as far as it goes, but it omits the reference made in Section 3.8.1 to a museum. This should be rectified: redevelopment of the Stag Brewery site offers all the excellent opportunities the plan mentions, but an important one of those opportunities is to create facilities that commemorate, celebrate and hopefully also perpetuate the deep historical heritage Mortlake has but that is largely invisible currently. A museum can be part of that, although it would be even better to celebrate the heritage of tapestry-making, brewing, etc. in a more active way as well. 3. As a more general comment, the plan is good and seems consistent with the Development Brief (barring the important correction above about the location of the playing fields). If this vision can be translated into practice on this site, it will be wonderful once-in-a-generation enhancement of Mortlake's community.

Detailed comments – where respondent gave no indication if supporting or objecting:

Ref. no.	Name/Organisation	Comment
37	Julian Austin, AMEC on behalf of National Grid	Specific Comments National Grid has identified the following site as being located over National Grid's underground transmission cables (275kV route – Willesden to Wimbledon). • Proposal Site EM1 Stag Brewery, Mortlake National Grid therefore requests that the following comments are taken into consideration: Our underground cables are protected by renewable or permanent agreements with landowners or have been laid in the public highway under our licence. These grant us legal rights that enable us to achieve efficient and reliable operation, maintenance, repair and refurbishment of our electricity transmission network. Hence we require that no permanent structures are built over or under cables or within the zone specified in the agreement, materials or soil are not stacked or stored on top of the cable route or its joint bays and that unrestricted and safe access to any of our cable(s) must be maintained at all times. The information supplied is given in good faith and only as a guide to the location of our underground cables. The accuracy of this information cannot be guaranteed. The physical presence of such cables may also be evident from physical protection measures such as ducts or concrete protection tiles. The person(s) responsible for planning, supervising and carrying out work in proximity to our cable(s) shall be liable to us, as cable(s) owner, as well as to any third party who may be affected in any way by any loss or damage resulting from their failure to locate and avoid any damage to such a cable(s).

Ref. no.	Name/Organisation	Comment
		<p>The relevant guidance in relation to working safely near to existing underground cables is contained within the Health and Safety Executive's (www.hse.gov.uk) Guidance HS(G)47 "Avoiding Danger From Underground Services" and all relevant site staff should make sure that they are both aware of and understand this guidance.</p> <p>Our cables are normally buried to a depth of 1.1 metres or more below ground and cable profile drawings showing further details along the route of the particular cable can be obtained from National Grid's Plant Protection Team. Cables installed in cable tunnels, deeper underground, whilst less likely to be affected by surface or shallow works may be affected by activities such as piling. Ground cover above our cables should not be reduced or increased.</p> <p>If a landscaping scheme is proposed as part of the works, we request that no trees and shrubs are planted either directly above or within 3 metres of the existing underground cable, as ultimately the roots may grow to cause damage to the cable.</p> <p>The relocation of existing underground cables is not normally feasible on grounds of cost, operation and maintenance and environmental impact and we believe that successful development can take place in their vicinity.</p>
153	Max Millington	<p>Para 3.8.1 and 'Evidence' East Sheen & Mortlake' document (hereinafter, the Evidence document). These comments relate to the proposed redevelopment of the Stag Brewery - Site EM1 (the Site). Please contact me should further clarification on cross-references be required.</p> <p>The following representations and recommendations are made without prejudice to any further remarks which may follow as part of any subsequent consultation or process. The Evidence document states that, 'Brewery likely to be closed within the next 2-3 years, site is already subject to a detailed site Brief, adopted by the Council following extensive public consultation. Uses and proposal will reflect the Brief.' I am a resident of the development of c. 75 residential units constructed at Williams Lane (including at Wadham Mews) in 2011 and 2012 (i.e. since the preparation of the Brief). The Brief, if implemented, is likely to impact significantly such residents and their property. I would therefore like the opportunity to consider the Brief properly - the level of detail in the Brief I understand is much higher than that contained in the Site Allocations Plan - and, if appropriate, to require that the Brief, if it is to be referenced in the final plan, be updated to take full account of its impact on the new properties and their inhabitants.</p> <p>To this extent, I endorse the statements made in paragraph 3.8.1 and the Evidence document that:</p> <ol style="list-style-type: none"> 1. 'If taller buildings are necessary these should be located at the core of the site and the height and scale should diminish towards the perimeter of the site and along the riverside.' 2. The development 'must be of a high standard to reflect this important riverside location, lying partly within the Thames Policy Area and a conservation area.' 3. The development 'Need[s] to take account of cumulative impacts on local area, amenity and neighbouring properties due to a large increase in uses on this site' <p>In considering the additional impact of the proposed development on the new Williams Lane properties, I would additionally state:</p> <ol style="list-style-type: none"> 1. Any new buildings on the Site should be of a style which is sympathetic to the style of those buildings in the immediate vicinity of the Site. The height of any new building must not exceed at any place the height of the building on the Site which it renovates or replaces. The right to light of all properties neighbouring the Site must be respected. 2. Williams Lane is a quiet road which is relatively unused by vehicular traffic. Owing to parked cars without traffic restrictions, this is effectively a single track road without markings. The proposed changes (including a new school of potentially 360 pupils and additional residential property) are likely to increase significantly the traffic on this road and will necessitate further consideration of such impact, including the introduction/extension of a parking zone with appropriate resident permissions. 3. As noted in the Site Allocations Plan and Evidence document and Sustainability Appraisal Report, there will be an impact on the transport requirements of the area. I believe that to a certain extent this requirement already exists in light of the 2011/2012

Ref. no.	Name/Organisation	Comment
		<p>Williams Lane development.</p> <p>A. The introduction of a new bus hub at or around the Site is necessary to extend the 209 service at least to the Stag Brewery (and ideally to Clifford Avenue) where there already exists a high density of residential property which could be better served by bus links.</p> <p>B. Consideration should be given to extending some or all of the Putney river boat services which run towards the City to the new Site (& Kew) to alleviate pressure on the railways/improve environmental sustainability.</p> <p>C. The final Plan should provide for a right of way across the Site by foot for the residents living to the North West and West of the site to the railway station (without needing to go around the playing field).</p> <p>Requests for clarification:</p> <p>1. The Evidence document states that there are no public rights of way at the site. Is this correct? Depending on what is meant by this term, I would expect that Ship Lane and the footpaths which run off Williams Lane (behind Reid Court) and beside/behind the Ship public house are public rights of way.</p> <p>2. The Evidence document includes (at 'UDP/LDF Site') a separate proposal for the Eastern part of the site which suggests that that development could proceed independently of any redevelopment of the Western part. If this is the case, the Plan should address this optionality and which parts of the present proposal would be pursued under the Eastern part and Western part respectively.</p>
2	Lucy Owen, Port of London Authority	<p>Thank you for consulting the PLA about the Pre-Publication Site Allocations Plan. Due to the very specific nature of the PLA's roles and responsibilities I have chosen to respond by email rather than filling in the questionnaire, I hope that is acceptable. I have now reviewed the document and would like to make the following comment:</p> <p>EM1 – Stag Brewery, Lower Richmond Road, Mortlake – reference is made to redeveloping the site for a mix of uses including river related uses. This is expanded upon in the justification at paragraph 3.8.1 stating uses should “include restaurants, cafes and small retail spaces, community, health and community leisure uses, a museum, boat houses and other river-related uses/activities.” It is noted that the red line boundary of the site does not extend over the river. The PLA would wish to have early and detailed discussions about any proposed river related uses/activities to ensure that they do not have a detrimental impact on navigation, river regime or the environment.</p>
23	Catherine Stephens	<ul style="list-style-type: none"> * Support the inclusion of this key site within the Site Allocations Document. * This is a significant site, occupying an important location on the River Thames and it is essential that planning policy maximises the benefits of redevelopment to create a new heart for Mortlake. * Reference to residential should ensure that a mix of housing types and tenures are provided. Note also that the proportion of affordable housing will be subject to viability. * Proposal should recognise the importance of improving the accessibility of the site and the surrounding area by all modes of transport. * Note that there is now a new primary school on Mortlake (Thomson House) * Reference to 'small retail units' - define what is meant by 'small'. * Support retention of building of townscape merit. * Can supporting text include reference to a hotel, which would be a 'leisure' use. * Proposal should also include reference to public realm improvements, such as better lighting, footpaths and cycle paths to create a safe and inclusive community. * Proposal should enhance public access along the River Thames and linkages and connectivity to Mortlake and Barnes Bridge train stations, as well as to bus services along the A316 and Lower Richmond Road.

Ref. no.	Name/Organisation	Comment
		<p>* Proposal should recognise that the mix of uses should reflect neighbouring properties.</p> <p>As well as reference to exploring the possibility of a new bus stopping/turning facility, consideration should also be given to increasing the frequency of bus routes.</p> <p>Reference to residential should ensure that a mix of housing types and tenures are provided. Note also that the proportion of affordable housing will be subject to viability.</p> <p>Proposal should recognise the importance of improving the accessibility of the site and the surrounding area by all modes of transport.</p> <p>Reference to 'small retail units' - define what is meant by 'small'.</p> <p>Include reference to a hotel, which would be a 'leisure' use.</p> <p>Include reference to public realm improvements, such as better lighting, footpaths and cycle paths, improving connectivity and legibility to create a safe and inclusive community.</p> <p>Proposal should recognise that the mix of uses should reflect neighbouring properties.</p> <p>As well as reference to exploring the possibility of a new bus stopping/turning facility, consideration should also be given to increasing the frequency of bus routes.</p>
46	Richard Parish, English Heritage	This site incorporates a comprehensive approach to the development of the brewery site, potentially incorporating higher building elements. We note the reference to the Mortlake Conservation Area, and Mortlake Green Conservation Area Studies. However, in our view, the conservation area statements form only brief character assessments and do not provide the necessary guidance and clarity to positively steer a large scale redevelopment. We would recommend referencing the Justification to more comprehensive national and local guidance. We understand that the Council has undertaken a design brief SPD for the site (referred to in the Sustainability Appraisal). We would therefore recommend referencing this in the justification. This will help to guide any proposed development respond to the aspirations for the site and to safeguard the setting of the adjacent Mortlake conservation area and designated heritage assets.
170	Sarah Considine, Greater London Authority	TfL supports the need to investigate bus stopping and turnaround facilities within the site but requests that the wording 'to replace those in Avondale Road' is removed. No decision has been taken on the disposal of this site.

EM 2 Mortlake High Street, Mortlake

Detailed comments – where respondent objecting to it:

Ref. no.	Name/Organisation	Comment
28	Gloria Shearer	<p>I sometimes wonder where these 'bright' ideas originate, especially where they benefit a small minority and disadvantage so many others.</p> <p>This road is mightily congested twice a day every weekday. If you narrow this road the congestion will get a lot worse and further delay all the motorists and those who travel on the 3 bus routes. These people will be grossly disadvantaged. And who will benefit? Cyclists, presumably.</p> <p>I object most strongly to this priority. The harm and annoyance to so many far outweighs the potential benefit to the few, and an unpopular few to boot.</p> <p>Moreover, you do not mention on-street parking facilities. There will probably be no room. Where are these motorists including the</p>

Ref. no.	Name/Organisation	Comment
		<p>car club to find parking ? I'll tell you where is likely: in the little streets off North Worple Way which have no spare parking space. This will cause extensive aggravation and annoyance. I do not have a car and so my comments are disinterested here. Do not deprive these residents of their spaces. It just is not fair.</p> <p>We have had serious persistent disruption from road works, water etc, for a very long time now. We'd like a bit of peace. I seriously suggest you think again. It would be a waste of money. Reduce parking fines instead. At least that would be popular. This project will generate intense local anger. Few may have jumped up and read your official notices near the Avondale bus stop. I presume a man, and a tall man at that, put up these notices.</p> <p>Think again.</p>

Detailed comments – where respondent gave no indication if supporting or objecting:

Ref. no.	Name/Organisation	Comment
33	Nicola Gill, Mortlake with East Sheen Society	<p>The proposal to narrow the roadway and create a cycle path would only be possible for a short distance of Mortlake High Street where there are two lanes (from the roundabout with Sheen Lane). The cycle pathway would then 'disappear' when the road returns to single lane each way. There is no benefit to be gained from installing a cycle pathway for such a short distance. Environmental improvements are mentioned but not detailed - these may well be worthwhile. Resources should not be wasted on a small section of cycle path. If and when the Stag brewery development takes place this section of road would probably be changed anyway.</p>

EM 3 Mortlake Station, Sheen Lane, East Sheen

Detailed comments – where respondent supporting it:

Ref. no.	Name/Organisation	Comment
170	Sarah Considine, Greater London Authority	<p>Improvements to the station are strongly supported by TfL. Bus provision should be linked to the Stag Brewery site in line with London Plan Policy 6.7.</p>

Detailed comments – where respondent gave no indication if supporting or objecting:

Ref. no.	Name/Organisation	Comment
46	Richard Parish, English Heritage	<p>The Station falls within Mortlake Green conservation area and also lies to the north of the Sheen Lane conservation area. Elements of the station may be considered to make a positive contribution to the character and appearance of the station, as such we would advise reference to the need for new elements and alterations to respond positively to local character in accordance with national policy.</p>

EM 4 Bus Station, Avondale Road, East Sheen

Detailed comments – where respondent gave no indication if supporting or objecting:

Ref. no.	Name/Organisation	Comment
170	Sarah Considine, Greater London Authority	No decision has been taken on an alternative location or regarding the overall disposal of this site. TfL requests the wording within the justification is amended to state: 'Subject to the re-provision of the bus facilities in a suitable location to be agreed with TfL, residential development, including affordable units...'. This will ensure conformity with London Plan Policy 6.7 and the Mayors Land for Transport and Industry SPG.

EM 5 172-176, Upper Richmond Road and telephone exchange to rear, East Sheen

Detailed comments – where respondent supporting it:

Ref. no.	Name/Organisation	Comment
46	Richard Parish, English Heritage	Given the potential for redevelopment as residential or school use, we would recommend reference to housing design policies and consideration of how the scale of development may impact upon the setting of Queen's Road conservation area and views from Mortlake Cemetery.
132	James Hadden, Stiles Harold Williams Partnership LLP	Our clients own 166-170 Upper Richmond Road West (edged in highlighted yellow on the attached plan) and wanted to know whether there was a possibility that their property could be included within this proposed site? There are two main reasons for this. Firstly, the Council's proposal justification explains that they wish to create an active frontage along Upper Richmond Road and inclusion of our clients property could certainly help in that regard. The other obvious reason is that inclusion of our client's property would regularise the shape of the site allocation nicely to form a more uniform rectangle with greater road frontage.

Detailed comments – where respondent objecting to it:

Ref. no.	Name/Organisation	Comment
3	Hilary Bishop, Telereal Trillium	There would be no possibility whatsoever in the foreseeable future (beyond say 2025) to dispose of any one of the three sites in Richmond. Theoretically it would be possible to redevelop the sites but the costs in trying to vacate the exchanges runs into the hundreds of thousands and BT are not able to offer the buildings at present. Please remove them due to undeliverability.

E EM6 Old Power Station and Tideway Yard, Mortlake High Street, Mortlake

Detailed comments – where respondent objecting to it:

Ref. no.	Name/Organisation	Comment
107	Freddie Clegg,	The change that I am proposing is to remove E EM 6 Old Power Station and Tideway Yard from the list of designated

Ref. no.	Name/Organisation	Comment
	Marston Properties	<p>employment sites, with particular focus on the Old Power Station. The reasons for this are as follows:</p> <p>1) We are currently finding it difficult to let our office spaces, particularly at the Old Power Station. When we do find a new tenant they are often paying a rent well below the achievable rate for the area.</p> <p>2) The office space at the Old Power Station is very tired not good quality and has a poor office layout. Therefore in the future this office space will struggle to compete unless extensive works are carried out.</p> <p>3) In regards to the allocation of 'employment sites' through local plans, paragraphs 17 and 22 of the National Planning Policy Framework (NPPF) published March 2012 are relevant.</p> <p>Paragraph 17, bullet point 3 states that: "...Plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of residential and business communities..."</p> <p>Whilst paragraph 22 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 that purpose. Land allocations should be regularly reviewed. Where there is no reasonable prospect of a site being used for allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and relative need for different land uses to support sustainable local communities"</p> <p>As you will note, the NPPF indicates that allocations should take account of market conditions.</p> <p>In regards to the provision and demand for office space in the London Borough of Richmond, the London Borough of Richmond Employment Land Study 2009 and the London Borough of Richmond Employment Sites and Premises Assessment, confirm that there is a large existing supply of office space within the borough.</p> <p>4) As you'll see, paragraphs 4.28-4.44 of the Assessment of Employment Sites and Premises 2013 discuss the existing office market sector in detail. Of particular note, paragraph 4.30 states that Richmond is one of the only boroughs (outside the Central Activities Zone) where speculative office development remains viable and paragraph 4.39 appears to identify that there is approximately 38,000 sqm of vacant office floorspace.</p> <p>In regards to future growth, office jobs are expected to grow by 1,700 by 2018, which according to paragraph 8.11 could be accommodated in the existing surplus stock of office space.</p> <p>Therefore there doesn't seem to be any reason for why The Old Power Station and Tideway Yard should be made key employment areas. I hope you take these points into consideration when you make the final publication. If you have any questions or require further information please do not hesitate to contact me.</p>

Detailed comments – where respondent gave no indication if supporting or objecting:

Ref. no.	Name/Organisation	Comment
46	Richard Parish, English Heritage	The two sites lie within the Mortlake conservation area and adjacent to the grade II listed no 123. No indication is given about the contribution of the existing sites or whether their designation as an Employment Site encompasses redevelopment. We would recommend that reference be made for the need for any adaptation, or reuse to consider the impact on the designated heritage assets.

Possible additional sites in East Sheen and Mortlake suggested by respondents:

Ref. no.	Name/Organisation	Comment
42	Claire Davies, DTZ on behalf of Royal Mail Group Ltd	<p>For Background, Policy and viability see response 42 for Hampton</p> <p>We request the inclusion of the following freehold property, shown on the enclosed site plan, within the draft Site Allocations Plan: Mortlake And Barnes Delivery Office, 2-12 Mortlake High Street, London, SW14 8JB Mortlake and Barnes Delivery Office is surrounded by residential and employment uses. The redevelopment of this site for residential use (potentially as part of mixed use scheme) may therefore be appropriate in this context, in accordance with the requirement of the National Planning Policy Framework for the development of sustainable communities.</p>

Other comments re East Sheen and Mortlake:

Ref. no.	Name/Organisation	Comment
26	Richard Boother (RPS) on behalf of Mr S. Oxley	<p>RPS has been instructed by Mr. S. Oxley to object to the continuing designation of land at 32 Clare Lawn Avenue as Metropolitan Open Land (MOL).</p> <p>Site Location The site the subject of these representations, as shown on the accompanying Site Location Plan) is situated at the southern edge of the built up area of East Sheen, immediately adjacent to the northern end of Richmond Park, 2.7km to the east of Richmond Town Centre.</p> <p>The site has an area of approximately 1.05ha and is accessed via a narrow drive from the south of Clare Lawn Avenue. The site is adjoined by medium to low density residential properties fronting Clare Lawn Avenue and Parkgate Gardens. Given its residential use, the site shares the suburban character and appearance of these adjoining properties, as opposed to the wide open space of the Park to the south.</p> <p>Planning History and Background The term 'Metropolitan Open Land' was created in the 1960's by the former Greater London Council (GLC), and applied to Sir Patrick Abercrombie's 'Green Wedges' and other areas of strategic open space in London. The term was introduced as part of the preparation of the Greater London Development Plan (GLDP), which post-dates the erection of the previous building on site. Its stated purpose was to define open space which is of significance for Greater London as a whole. It included open land of considerable diversity, ranging from Central London's Royal Parks to common land and wider undeveloped areas bordering the Green Belt. The GLC, at the time, described the MOL as land forming islands in the urban fabric or penetrating deeply into the urban fabric in the form of wedges, and was viewed as providing "useful and attractive breaks in the built up area relieving the monotony of an otherwise continuous development".</p> <p>The MOL concept was carried forward into Regional Planning Guidance RPG3 (Strategic Guidance for London) adopted in 1996. Paragraph 7.7 of RPG3 stated: "MOL has been recognised as land of predominantly open character which has more than Borough significance, generally because of its size and catchment area. The main criteria for MOL designation are:</p> <ul style="list-style-type: none"> • Land which contributes to the physical structure of London by being clearly distinguishable from the built up area. • Land which includes open air facilities, especially for leisure, recreation, sport, arts and cultural activities and tourism

Ref. no.	Name/Organisation	Comment
		<p>which serve the whole of significant parts of London.</p> <ul style="list-style-type: none"> Land which contains features or landscape of historic , recreational, nature conservation or habitat interest , of value at a metropolitan or national level.” <p>Paragraph 7.9 stated that “if the land does not serve a catchment area of strategic significance or draw visitors from several Boroughs, it may be more appropriate to propose and justify other local designations”.</p> <p>Planning consent was granted for a large detached dwelling towards the eastern end of the site in the 1950’s. Planning consent was first obtained for a replacement dwelling on the site in 1998 (98/1843 refers), and the application was renewed in 2005 (04/3158/FUL) and again in 2010 (09/0663/FUL). In 2012, planning consent was granted on appeal for the demolition of the existing dwelling and ancillary buildings and the erection of a new larger two storey dwelling with basement (11/1473/FUL and APP/L5810/A/11/2161139 refer). The previous dwelling has now been demolished and the new dwelling is currently under construction.</p> <p>Planning Policy Context National Planning Policy Framework (NPPF)</p> <p>The previous policy guidance of PPG2 on Green Belts applied equally to MOL (as noted in the Revised Early Minor Alterations to the London Plan published 11th October 2013). PPG2 has now been superseded by paragraphs 79-92 of the NPPF. Paragraph 80 sets out the five purposes of the Green Belt (MOL):</p> <ul style="list-style-type: none"> to check the unrestricted sprawl of large built-up areas; to prevent neighbouring towns merging into one another; to assist in safeguarding the countryside from encroachment; to preserve the setting and special character of historic towns; and, to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. <p>Paragraph 84 states that when drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development, and should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary.</p> <p>The London Plan</p> <p>The London Plan now provides the strategic planning guidance for London and contains a policy relating to MOL (policy 7.17). This states that any alterations to the boundary of MOL should be undertaken by boroughs through the LDF process, in consultation with the Mayor and adjoining authorities. To designate land as MOL, boroughs need to establish that the land meets at least one of the following criteria:</p> <ul style="list-style-type: none"> a it contributes to the physical structure of London by being clearly distinguishable from the built up area; 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; c it contains features or landscapes (historic, recreational, biodiversity) of either national or metropolitan value; d it forms part of a Green Chain or a link in the network of green infrastructure and meets one of the above criteria. <p>The previous version of the London Plan set out three valuable functions performed by MOL which were broadly the same as those set out in RPG3. These were:</p> <ul style="list-style-type: none"> protecting open space to provide a clear break in the urban fabric and contributing to the green character of London; protecting open space to serve the needs of Londoners outside their local area; and, protecting open space that contains a feature or landscape of national or regional significance. <p>Reasons for removing site from MOL</p>

Ref. no.	Name/Organisation	Comment
		<p>Given the purposes of including land within the Green Belt, and the historic functions of MOL as set out in the GLDP and RPG3, it is curious that the appeal site was designated part of the MOL in the first place, and that the designation has survived subsequent reviews (most recently in 2006).</p> <p>The site is clearly distinct from Richmond Park to the south which acts as the check to unrestricted urban sprawl into open countryside. Because of the size of the site, its removal from the MOL will not make it more likely the existing built up area of East Sheen will sprawl further to the south and coalesce with other neighbouring urban areas. The wall along the southern boundary is a perfectly defensible boundary against such scenarios. The site does not preserve the setting and special character of an historic town, and its on-going designation as MOL would in no way because of its size, encourage the recycling of derelict or other urban land.</p> <p>The site in itself does not provide a clear break in the urban fabric. Indeed, it is RPS' view that the site is an integral part of the urban fabric. This particular function is instead performed by Richmond Park, which draws visitors from across London as a whole. The site in itself does not materially contribute to the green character of London. What limited contribution it does make is hardly of strategic significance, and it could be argued that much of the low density housing surrounding the site, which is not MOL, makes a similar contribution. The site is in private ownership, and has been certainly since the evolution of MOL as a concept, and so serves no purpose in servicing the needs of Londoners. The site does not contain any features of landscape of national or regional significance, and does not form part of a Green Chain or link in the network of green infrastructure, which meets any of the above criteria.</p> <p>Certainly, the site does not conform to any of the criteria used to assess land for inclusion within the MOL as set out in London Plan policy 7.17.</p> <p>In allowing the recent appeal for a substantially larger building on the site, the Planning Inspector considered the characteristics of the site very carefully. He noted in paragraph 14 of his decision letter that:</p> <p>"The site comprises a large residential curtilage within a low density suburban townscape, rather than a location with a semi-rural character."</p> <p>The site is clearly an integral part of the built up area, quite distinct from the wide open space of Richmond Park, and the transition between the two is very clearly marked by the intervening boundary wall. The site is not distinguishable from the built-up and thus fails criterion a. The site does not include any open air facilities serving whole or significant parts of London and so conflicts with criterion b. The site does not contain any features or landscape of national or metropolitan value, thus failing to meet criterion c. By not satisfying criteria a-c, the site cannot fulfil the requirements of criterion d.</p> <p>As a large site within the built-up area, the site offers a sustainable location for future development, and in accordance with paragraph 1.0.5 of the pre-publication version of the Site Allocations DPD, a review of the site's designation as MOL is justified. Because of the unique characteristics of the site, it is considered essential that proper consideration of these representations requires a site visit. To this end RPS would be happy to arrange a site visit and meet Planning Officers on site to discuss these issues.</p>

Sites in Ham and Petersham

HP 1 Latchmere Prison, Church Road, Ham

Detailed comments – where respondent supporting it:

Ref. no.	Name/Organisation	Comment
46	Richard Parish, English Heritage	The site lies just to the south of Ham Common. However we note that there is an adopted planning brief and support the decision to provide more detailed guidance to help steer the potential redevelopment.

HP 2 Ham Central Area, Ham

Detailed comments – where respondent supporting it:

Ref. no.	Name/Organisation	Comment
46	Richard Parish, English Heritage	The site lies adjacent to the Ham House conservation area and a number of designated heritage assets at its eastern end. We note and support the intention to undertake a more detailed consultation to guide any proposed redevelopment.

Sites in Kew

KW 1 Former Inland Revenue, Ruskin Avenue, Kew

Detailed comments – where respondent supporting it:

Ref. no.	Name/Organisation	Comment
7	Caroline Brock, Kew Society	Support the following KW1 Former Inland Revenue Site for residential, including affordable, employment, community or health uses

Detailed comments – where respondent objecting to it:

Ref. no.	Name/Organisation	Comment
105	Geoff Armstrong, Armstrong Rigg Planning on behalf of Taylor Wimpey West London	We are instructed by our client, Taylor Wimpey West London (the new owners of the site), to submit representations to the Pre-publication Site Allocations Plan in respect of proposed Site KW1 – Former Inland Revenue, Kew which is suggested for allocation for 'Mixed uses to include residential, including affordable units, employment, community or health uses.' Consultation Response Taylor Wimpey West London endorse the recognition that this important, vacant brownfield site is suitable for redevelopment and fully support the recommendation that residential is the main use of the site. The site is located in a very sustainable location with good access to a range of non-car modes of transport, a range of facilities (retail etc) and services (schools etc). The site has been subject to two previous mixed use planning applications (reference 09/0610/FUL for 111 flats, a care home and commercial space and reference 10/1526/FUL for 97 flats, a care home and commercial space). In considering both applications, no objection was raised by Officers or an Inspector to the principle of high density residential development on the

Ref. no.	Name/Organisation	Comment
		<p>site, which in both cases comprised high density schemes of 1, 2 and 3 bedroom flats. The site is also included in the Council's current Housing Land Supply in the 2011/12 Annual Monitoring Report (AMR) and in three previous AMRs (2008/09, 2009/10 and 2010/11) as a deliverable site for houses.</p> <p>The site is surrounded on two sides by the Kew Riverside Developments (192 dwellings of between 4-6 storeys in height) and the National Archive Building (up to 6 storeys) on another. Both of these developments clearly establish the principle of high density development in this area.</p> <p>The draft policy also requires the provision of affordable housing which is clearly a requirement of policy and its delivery will contribute towards the Council's affordable housing need.</p> <p>It is clear from the above that the site is suitable for allocation for a high density residential use.</p> <p>We now turn to other suggested uses in the draft policy:</p> <p>Suitability of the site for community use</p> <p>The most up to date assessment of such need is contained in the Site Allocations Background Paper to the draft Plan 'Needs Assessment – Community Facilities' (July 2013). This identifies that there is an existing wide range of community centres across the Borough but provides no evidence in respect of actual future need, as is the case with other specific community uses including libraries, youth facilities and arts and culture facilities. In this respect, the table at Paragraph 2.7.14 of the draft Plan details that Site KW1 will contribute towards meeting the need specifically for community centres but contains no justification of assessment for this.</p> <p>There are a number of existing premises within the vicinity of Site KW1 which already provide meeting spaces for a range of community uses. For example, St Luke's Church, which is run as a community centre by the Kew Community Trust, is home to The Avenue Social Club and contains some 350m² of space available for hire. Nearby St Philip and All Saints Church (The Barn) and St Winefride's Church also provide space to hire for community uses and host a range of community groups.</p> <p>We consider that the Council has not objectively assessed the future need for community centres Borough-wide or in Kew and given the level of existing provision within close proximity of the site, we do not see any justification for such use on the site. Furthermore, the Council's latest Annual Monitoring Report (2011/12) identifies that overall there has been a substantial increase in the amount of completed floorspace in community use (5,406m²) in the monitoring year which is similar to the previous year where there was also a substantial increase.</p> <p>In light of the above, it is considered that there is no justification to require a community use as part of the proposed site allocation.</p> <p>Suitability of the site for health use</p> <p>Our starting point for the assessment of health needs is the Site Allocations Background Paper 'Needs Assessment – Health Facilities' (September 2013) which details the future priorities for health provision as a result of the latest premises review of GP practices undertaken by Richmond's Clinical Commissioning Group (CCG). This review assesses the percentage below the minimum and maximum target floor area of each premises and whether there is scope to expand. The premises are clustered into geographical areas in order for the CCG to determine the extent of current provision in order to make decisions on where best to prioritise investment.</p> <p>The CCG Review did not identify any specific projects or site needs for health care facilities but noted a need to provide additional capacity borough-wide to support growth, new housing development and an increasing population, with particular focus on the Richmond, Ham and Kew cluster given that it has the highest overall combined percentage below the minimum floor area targets.</p> <p>There are currently two GP surgeries operating in Kew (Kew Medical Practice, some 0.8km from the site and North Road</p>

Ref. no.	Name/Organisation	Comment
		<p>Surgery, 0.9km from the site). A third surgery, (Kew Gardens Surgery) has relatively recently closed. It is acknowledged that the Review shows that the two surgeries are both below the target floor areas, although there are premises in other areas with greater needs. However, both surgeries are accepting additional patients and are within 1km of the site. It is also important to note that Kew Medical Practice, which is closest to the site, also has capacity to expand as detailed in the CCG Review.</p> <p>Overall in the Borough there has been a recent gain in health related floorspace completed with a total of 1,085m² built (2011/12 Annual Monitoring Report) however, it is recognised that there is some need for additional healthcare capacity in Kew. It is considered that this need could be met by providing Section 106 contributions as a result of development on the KW1 site towards improvements to the existing Kew Medical Practice, which is closest to the site and as confirmed in the CCG Review, has scope for expansion. A new facility on the site is not considered to be appropriate or justified in light of likely funding and management issues and the fact that the CCG Review identifies that there is no need for a specific health project or site to be provided.</p> <p>In light of the above, it is therefore considered to be inadequate justification to require a new health use as part of the proposed site allocation and that needs can be better met through financial contributions, subject to viability, towards the improvement of existing provision within the local area as a result of development on the site.</p> <p>Suitability of the site for employment use</p> <p>The previous planning application was considered against Policy EM2 of the adopted Development Management Plan which seeks to retain sites which were last used for employment purposes, unless there are exceptional reasons for release. CP19 of the adopted 2009 Core Strategy similarly seeks to retain land in employment uses for business, industrial or storage. For the reasons set out below, it is considered that a retained employment use should no longer be required as part of the site allocation or a future planning application:</p> <p>The National Planning Policy Framework (NPPF)</p> <p>The policies contained within the NPPF apply from the date of its publication (27th March 2012). Applications for planning permission must continue to be determined in accordance with the development plan unless material considerations, which include policies within the Framework, indicate otherwise. The NPPF aims to strengthen local decision making and reinforces the importance of up-to-date Plans. In relation to the weight to be attributed to policies in Local Plans, Paragraph 211 makes it clear that policies should not be considered out of date simply because they were adopted prior to the publication of the Framework. Paragraph 215 of the NPPF however states that following the 12-month period from the publication of the Framework (27th March 2013), “...due weight should be given to relevant policies in existing Plans according to their degree of consistency with this Framework (the closer the policies in the Plan to the policies in the Framework, the greater the weight that may be given).” Both Policy EM2 of the Development Management Plan and the overarching Core Strategy Policy CP19 predate the NPPF, having been adopted in 2009 and 2011 respectively. As relevant policies contained within existing Plans therefore, it is necessary to consider the consistency of their content with that of the NPPF in order to determine the due weight to be attributed to them.</p> <p>With regard to employment use, the NPPF confirms at Paragraph 22:</p> <p>“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 that purpose. Land allocations should be regularly reviewed. Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities.”</p> <p>On a similar theme and in its drive to boost significantly the supply of housing, the NPPF confirms that local planning</p>

Ref. no.	Name/Organisation	Comment
		<p>authorities should normally approve planning applications for change from commercial use to residential, where there is an identified need for additional housing in that area and no strong economic reasons why such development would be inappropriate (Paragraph 51).</p> <p>The provisions of the NPPF in relation to the change of use of sites from commercial to residential use are clearly far more flexible and responsive than Development Management Policy EM2, which is a restrictive policy, referring to the loss of employment land being permitted only in exceptional circumstances. Given that Policy EM2 has a limited degree of consistency with the NPPF in this regard therefore, it is considered that more weight should be given to the employment policies contained in the NPPF and that any decision to require the land to be retained for employment purposes must now be seen in the current economic context.</p> <p>Sui Generis Use</p> <p>The site was previously in a Sui Generis use as a Sorting Office. Policy EM2, as well as CP19 of the adopted Core Strategy seek to retain only defined employment uses (B1, B2 and B8). On this basis, Policy EM2 does not apply.</p> <p>In the event that these circumstances are not considered sufficient in themselves, there exist a number of other compelling reasons which together serve to demonstrate that the site simply no longer represents a suitable or attractive location for employment use. These reasons, a number of which are drawn from the Council's own evidence base, are supported by the accompanying statement from commercial agents, Vail Williams:</p> <p>The site has fallen out of use and there has been no active employment on it for at least the last 10 years, this is despite the 5 year period between 2003-2007 being one of the most active periods for new development since the Second World War. It is understood that the previous Sorting Office building had been removed at the time of the 2009 planning application and that it was vacant for 6 years prior to its demolition. No sole replacement employment use has been sought or secured in this time and the site has not contributed in any way to the local economy for many years. It is noted that a number of third party representations to the previous schemes on the site questioned the employment requirement given that the site has been vacant for so long and that the adjacent National Archives provides a significant number of jobs;</p> <p>Given the length of vacancy (an indication of its unsuitability for employment use), the site was not included in the 2006 or 2009 URS Employment Land Reviews, which provided an audit of existing employment land and premises. The 2009 Review recommended specifically that existing B1, B2 and B8 premises were protected. It also recommended that improvements were made to office provision in the town centre areas of Richmond, Twickenham and Teddington where demand is greatest and where in July 2013, the Council agreed to apply to adopt Article 4 Directions for permission for changes of use from office to residential to be required. The site is not within one of these town centre locations where office demand is greatest and sought to be protected and did not previously provide a B class use. As such the recommendations of the Review are not considered relevant;</p> <p>The recent 2013 Peter Brett Associates Assessment of Employment Sites and Premises provides an update to the 2006 and 2009 reviews to take account of the change in economic circumstances in the interim. It also builds upon the findings of the Council's 2010 Local Economic Assessment. The 2013 Report continues to identify that employment uses in the Borough are concentrated in the main centres of Richmond, Twickenham and Teddington, not Kew. It also provides information on the existing employment property market and demands in the Kew area. Kew is acknowledged as one area where economic activity is limited by reason of the large areas of green space it contains, which is why Richmond is 'such an attractive residential Borough' (page 37). Figure 5.3 shows that Kew contains 6% of the business base of Richmond however it has a larger than average share of the office based business. Figure 5.8 also identifies that Kew has the second highest proportion (second only to Twickenham) of public administration jobs as a result of the large employer at the National Archives, adjacent</p>

Ref. no.	Name/Organisation	Comment
		<p>to the site. Figure 5.9 shows that Kew is the only area, other than Twickenham, Teddington, Richmond which contains such major large employer (200+ employees). Table 5.2 also identifies that Kew has the highest proportion of Real Estate jobs compared to the rest of the Borough. In terms of future growth, Figures 8.6 and 8.7 project that Kew is anticipated to accommodate one of the lowest levels of office growth to 2018 (along with Ham, Whitton and Mortlake);</p> <p>The site has never been specifically allocated for employment purposes. There are other sites proposed as 'Key Employment Sites' within the draft Site Allocations Plan (including 3 in Kew - EKW 4, EKW 5 and EKW 6) which are considered by the Council to be important to retain in employment uses in perpetuity. KW1 is clearly not regarded as being of such importance to employment provision to warrant this designation; and</p> <p>The previous applications on the site proposed a 50% reduction in commercial floorspace (1,388m²) compared to that contained in the demolished building (2,790m²). This was considered by Officers to be justified given the additional provision of a care home and fact that the site is away from a local centre. In this respect, whilst a care home would provide an element of employment, it is not a B class use which the Council's policy initially seeks to retain. The agreement by the Council to such a reduction in commercial floorspace and the relatively small provision provides a clear indication that employment use of the site is not of critical importance.</p> <p>Employment use conclusion</p> <p>Our assessment, together with the advice from commercial agents, Vail Williams, confirms that by reason of its size and location, the site is no longer suitable or viable for employment use. The surrounding area is predominantly residential in character and the site is relatively small in size and isolated from the main established employment centres of Richmond, Twickenham and Teddington. The site is not an existing employment allocation and has been vacant for some 10 years with no significant employment use being sought or secured in that time. Available evidence indicates a sound supply of existing employment provision in the main centres but a lack of future demand for Kew as a whole, and for the site, in particular.</p> <p>In this context, the site is unlikely to attract large scale occupiers and any employment development would need to be built on a speculative basis with no guarantee of future occupation. Such a scheme would be likely to become a 'white elephant' making no contribution to the local economy and with a high prospect of future applications to change its use. The identified lack of need and inherent unsuitability of the site renders an employment use an unviable option.</p> <p>In light of the above, it is considered there is inadequate justification or policy support to require an employment use element as part of the proposed site allocation. This should be considered in the context of national planning policy, which provides for far greater flexibility in the change of commercial sites to residential use than adopted local policies where there are no strong economic reasons why such development would be inappropriate, as would be the case here.</p> <p>Requested change to Site Policy KW1</p> <p>Having regard to the comments and evidence outlined above, it is requested that the proposed Policy KW1 is amended to refer to the site being suitable <u>solely for residential use</u>. The proposed community, health and employment uses are considered to be unjustified and as such the Policy is unsound as drafted. The Policy should be re-written to read as follows:</p> <p>Site KW1 – Former Inland Revenue, Kew</p> <p>Redevelopment for high density residential development of up 200 flats, with affordable housing provision subject to viability. Private amenity space in the form balconies and terraces along with communal open green space, children's play space, landscaping and sufficient car parking should be provided. Section 106 contributions should be made towards healthcare, specifically for improvements to local GP surgery capacity</p>

KW 2 Kew Gardens Car Park, Kew

Detailed comments – where respondent supporting it:

Ref. no.	Name/Organisation	Comment
7	Caroline Brock, Kew Society	Support the following KW2 Kew Gardens car park on Ferry Lane to be relocated and the area restored as part of the Gardens and with a possible end point for a foot ferry or foot bridge to Ferry Quays, Brentford. We assume there would be a full assessment of the traffic implications for Kew Road if the relocation were to be within Kew Gardens where the current Kew Gardens staff parking is, as currently shown. We would also like to see consideration of re-provision to include suitable off- road parking for coaches for visitors to Kew Gardens which currently park on Kew Road
170	Sarah Considine, Greater London Authority	TfL supports the proposal to improve the river setting and new cross river connections in line with London Plan Policy 6.4.

Detailed comments – where respondent objecting to it:

Ref. no.	Name/Organisation	Comment
34	James Page, Richmond and Twickenham Green Party	If the car park would be relocated to the area marked in red nearer to the main entrance/green this would cause severe ecological disruption to the gardens there, and does not seem justified. The existing car park doesn't prevent a ferry point/bridge development

Detailed comments – where respondent gave no indication if supporting or objecting:

Ref. no.	Name/Organisation	Comment
46	Richard Parish, English Heritage	We would recommend expanding the reference to the site's protected status to include reference to the World Heritage Site etc.

KW 3 Kew Biothane Plant, Mellis Avenue, Kew

Detailed comments – where respondent supporting it:

Ref. no.	Name/Organisation	Comment
7	Caroline Brock, Kew Society	Support the following KW3 Kew Biothane Pant, Melliss Avenue for residential use, primarily for families with gardens and including affordable housing and keeping the currently designated Metropolitan Open Land as open amenity space. We think that the residential density

Ref. no.	Name/Organisation	Comment
		premitted for this site should be carefully reviewed given that its valuable river frontage will encourage developers to test limits.

Detailed comments – where respondent objecting to it

Ref. no.	Name/Organisation	Comment
126	Carmelle Bell, Savills on behalf of Thames Water	<p>Thames Water supports the identification of the Kew Biothane site as being suitable for residential development. It can confirm that the site will become surplus to its operational requirements during the lifetime of the Core Strategy and will therefore become available for redevelopment.</p> <p>Whilst Thames Water is supportive of the site being brought forward for residential use, it objects to supporting text contained in paragraph 3.10.3 which states that development should primarily be in the form of family housing with gardens.</p> <p>The NPPF and Policy CP14 of the Core Strategy both promote the effective use of development land. Paragraph 14.D of the Core Strategy confirms that the density of residential proposals should take into account the need to achieve the maximum intensity of use compatible with local context, while respecting the quality, character and amenity of established neighbourhoods and environmental and ecological policies.</p> <p>There is a development of 2 storey houses between Cedar House and Maple House to the west of the site, but otherwise the site is surrounded by developments of flats and apartments all of predominantly 5 storeys in height. Even allowing for a modest encroachment of development into the MOL, a development scheme based exclusively of houses would deliver in the order of 16 units. This cannot be said to be in keeping with the character of the area (which is primarily built to a much more dense form of development) or to make the most effective use of the site.</p> <p>On this basis it is considered that a development primarily in the form of family housing with gardens is not consistent with the planning policy context, or the urban context of the site. Rather a development incorporating flats and apartments, which would include family accommodation in the form of 2 and 3 bedroom apartments should be identified for the site.</p> <p>Thames Water therefore objects to the current wording of para 3.10.3 and proposes the following wording instead:</p> <p>“3.10.3 The redevelopment of this surplus site will provide an opportunity to enhance the environment, whilst meeting housing needs. Residential, including affordable units should be in keeping with surrounding developments and therefore flats and apartments are considered acceptable. It will be expected that development will be primarily family accommodation in the form of 2 and 3 bedroom units. Development will be expected to maximise the use of this brownfield site, with heights at least comparable to surrounding buildings, which are predominantly 5 storeys. Careful design will be needed to ensure the amenity of adjacent dwellings is not harmed. The area designated as Metropolitan Open Land should be predominantly brought forward as amenity space, but in accordance with the approach taken on adjacent developments, minor incursions into this area may be acceptable in order to secure a high quality design approach on the site.”</p>

Detailed comments – where respondent gave no indication if supporting or objecting:

Ref. no.	Name/Organisation	Comment
34	James Page, Richmond and Twickenham Green	This is an unusually 'industrial ' site so the opportunity should be taken to incorporate something such as a tracking solar energy plant perhaps with housing

Ref. no.	Name/Organisation	Comment
	Party	

E KW 4 Sandycombe Centre, Sandycombe Road, Kew

Detailed comments – where respondent supporting it:

Ref. no.	Name/Organisation	Comment
7	Caroline Brock, Kew Society	Support the following KW4 Sandycombe Centre designated a key employment site

E KW 5 Blake Mews, 1-17 Station Avenue, Kew

Detailed comments – where respondent supporting it:

Ref. no.	Name/Organisation	Comment
7	Caroline Brock, Kew Society	Support the following EKW5 Blake Mews, 1-17 Station Avenue designated a Key Employment site

Detailed comments – where respondent gave no indication if supporting or objecting:

Ref. no.	Name/Organisation	Comment
46	Richard Parish, English Heritage	The site lies within the Kew Gardens conservation area and as such we would recommend providing greater clarity as set out above in reference to Employment Site designation and the Council's vision for retaining this use and the possibility for redevelopment reuse (see comments re EBA3 Glentharm Road).

E KW 6 Marlborough Trading Estate, Mortlake Road, Kew

Detailed comments – where respondent supporting it:

Ref. no.	Name/Organisation	Comment
7	Caroline Brock, Kew Society	Support the following E KW6 Marlborough Trading Estate, Mortlake Road designated a Kew Employment site

Other comments re Kew:

Ref. no.	Name/Organisation	Comment
7	Caroline Brock, Kew	We are very pleased to see that some of the suggestions we made on sites in Kew have been included in your pre-publication

Ref. no.	Name/Organisation	Comment
	Society	<p>plan. We have now commented on the plan using the on-line pro-forma.</p> <p>You mentioned in your email to us that you would be in touch on how best to cover the range of issues important to local groups. We would like to engage on a number of issues, including:</p> <p>The old Inland Revenue site. You may know that Taylor Wimpey have now been selected as the preferred bidder for the site. We together with the Kew Residents' Association and the Kew Riverside Residents' Association are meeting with Taylor Wimpey on 6th November to hear their first thoughts on the development and put a first marker down on what we would like to see, in line with the Site Allocations Plan. As the site allocations plan will not be adopted until 2015, we would like to discuss how the designated uses can be enforced and what action might be taken to engage with Taylor Wimpey on the re-development of the site in a way that will be acceptable to the Council and the community, including proportions of the site that should be allocated to the various aspects of mixed use, and designs/densities that meet the requirements of the Council's Core Strategy and Development Management Plan. We would also like to discuss with you how the CCG can be engaged to encourage incorporation of modern primary care facilities, and what scope there is for encouraging both affordable housing and housing for senior living, particularly given the age profile of the Kew ward;</p> <p>Old Deer Park – what action can be taken to progress a comprehensive plan for the area before the expiry of current leases;</p> <p>Kew Library – what thoughts there are on the aim to co-locate with other public services, bearing in mind the current location is very central for residents as it is near village shops and transport</p> <p>What the overall vision is for Sandycombe Road, including employment and residential uses and tackling traffic problems especially in the context of the recent adverse Planning Appeal decision on 1-2 South Avenue.</p> <p>What action can be taken within the Local Implementation Plan (LIP) on traffic to reduce the high levels of traffic congestion in the area. We are not clear whether account has been taken in the LIP of outside Borough pressures on traffic and parking, including CPZ implications and costs. This is an immediate concern in Kew because of the inadequate assessment of the impact of the proposed new Brentford Football Stadium currently before Hounslow Council. We also wonder whether there is scope to relocate coaches and cars currently parking along Kew Road in order to improve traffic flow and make the northbound cycle lane functional.</p> <p>A number of the other site specific suggestions we made are not included in the consultation document, are you able please to clarify why these were not accepted? It would be helpful to discuss how to take forward these issues.</p>

Sites in Richmond

RI 1 Pools on the Park and surrounding, Old Deer Park, Richmond

Detailed comments – where respondent supporting it:

Ref. no.	Name/Organisation	Comment
7	Caroline Brock, Kew Society	Support the following R1 Pools on the Park and surrounding Old Deer Park designated for intensified sports use. We agree and want to see a comprehensive plan for the Old Deer Park adopted and progressed by the Council.
133	Dale Greetham, Sport England	RI 1 Support, site policies should specifically state that the existing sports facility provision will be protected

Ref. no.	Name/Organisation	Comment
173	Ellen Gates for The Twentieth Century Society	We write regarding the London Borough of Richmond upon Thames consultation on the pre-publication version of the Site Allocations Plan (October - November 2013), and in particular in respect of paragraph 3.11.1, RI 1 Pools on the Park and surroundings, Old Deer Park, Richmond (pages 93-94). As recognised in the consultation document, the Pools on the Park complex is a significant twentieth century building - at listed Grade II, and it is important that any development on or near the site recognises and respects its character and its relationship to its site. We therefore support the comments made by the Old Deer Park Working Party in its response to the consultation on this site.

Detailed comments – where respondent gave no indication if supporting or objecting:

Ref. no.	Name/Organisation	Comment
46	Richard Parish, English Heritage	R1 1 Pools on the Park and surroundings This site demonstrates the need for reference to relevant National and Local Policies for listed buildings and their settings to be included within the document and set out in the Meeting Needs Section.

RI 2 Richmond Station and above track, Richmond

Detailed comments – where respondent supporting it:

Ref. no.	Name/Organisation	Comment
46	Richard Parish, English Heritage	R1 2 Richmond Station and above track We are pleased to note that the Justification makes reference for the need to complement the existing station and conservation area. The short conservation area statement does not refer to the station and it would seem helpful to identify the positive elements of the site and the potential range of scales if redevelopment is sought.
170	Sarah Considine, Greater London Authority	TfL welcomes the desire to improve the station, and requests further consultation on the detailed proposals due to the incidence of both London Overground and London Underground services operating from this station. The comments on parking, and where the assessment shows it is not unreasonably adding to traffic congestion, are supported in line with London Plan policies 6.12 and 6.13.

Detailed comments – where respondent objecting to it:

Ref. no.	Name/Organisation	Comment
166	Howard Vie	Proposal RI2 Richmond Station As a user of Richmond Station and its Environs I object to this proposal. The recent improvements to the station have resulted in an excellent transport interchange. The proposal as stated is merely an excuse for excessive development over the station. This is unnecessary, of no benefit to residents or users and should be deleted as a proposal. The charm of Richmond station is its

Ref. no.	Name/Organisation	Comment
		open to the air platforms. Any development which would be of interest to property profiteers would inevitably be too high and damaging to the surrounding conservation area. Richmond Council - please just say no - in the interests of our amenities.
30	Mark Lankester	<p>The description in the above document of the form of development which would be suitable for this site refers to “an intensive mix of town centre uses at this important site at the gateway to the town”. I am writing in the hope that any emerging proposals will recognise the constraints which the location of the site imposes.</p> <p>The site does, of course, lie in a central position in Richmond. A temptation would be to assume that a variety of potentially intensive and noisy so-called “town centre uses” would, therefore, be suitable for it. In fact, as a glance at a map (or the location plan on page 95 of the consultation document) shows, the site is immediately adjacent to existing dwellings. The NCP multi-storey car park, which is currently accessed via Drummonds Place, juts out towards Northumbria Court and Lichfield Gardens. You will know that Northumbria Court is a warden-controlled sheltered development, and its residents’ interests need to be fully taken into account.</p> <p>My own interest stems from the fact that I live in Lichfield Gardens; my bedroom windows are a few metres from the NCP car park, and three other flats are even closer. From time to time I telephone the police on 101 because of the noise of skateboarders who make use of the car park, usually between 2330 and (if the police don’t move them on) about 0330. My purpose in mentioning those incidents is to illustrate that one needs to bear in mind not only the situation which will prevail if a new development is impeccably and sympathetically managed and operated but one in which predictable failings and inconsiderate or unthinking behaviour cause nuisance and annoyance for those living nearby.</p> <p>The adopted Core Strategy as it relates to Richmond Centre is already of concern, referring inter alia to the wish to “maintain capacity of drinking establishments and night clubs” and the willingness to “make use of potential for tall buildings in station area”. (See Table 8C within Policy CP8.)</p> <p>It is imperative that the character of the area as one of mixed commercial uses and intensive residential development be recognised, despite its “town centre” label, and that new elements of the “Night Time Economy” are not allowed to prejudice the interests of current residents.</p>

RI 3 Richmond Police Station, Red Lion Street, Richmond

No comments received

RI 4 Richmond Rugby, Kew Foot Road, Richmond

Detailed comments – where respondent supporting it:

Ref. no.	Name/Organisation	Comment
106	Huw Williams, CgMs on behalf of Richmond Athletic Association	<p>R1 4</p> <p>CgMs are instructed by the Richmond Athletic Association (RAA) to submit representations on the pre-publication draft of the Site Allocations Plan issued by the Council for consultation in October 2013.</p> <p>The RAA was incorporated in 1886. It is the organization responsible for managing the 26 acre site of the Richmond Athletic Ground, the historical home to two of the oldest and most recognised rugby clubs in the country, namely Richmond & London Scottish. All the mens, womens, youth & minis teams from the two clubs use the Athletic Ground for matches and training purposes throughout the rugby season. The venue has 7 rugby pitches, a grandstand adjacent to the main pitch that holds 1,000</p>

Ref. no.	Name/Organisation	Comment
		<p>people, two bars, catering outlets, changing rooms, offices, a shop and car park facilities . Every year the RAA also hosts numerous rugby 7s tournaments such as the Lloyds Insurance 7s, Surveyors 7s, City 7s, Law Society 7s, NAB 7s and Middlesex Club 7s, as well as established community events like the Fireworks Night and Rugby Rocks Festival. The RAA has strong connections within the local business community and also provides facilities for the local Falcons Boys School to use.</p> <p>The RAA is currently investigating how it can improve existing facilities at the Athletic Ground in order to secure the future of rugby on the site and also enhance sport and recreation facilities for the wider community. To this end the RAA support the Council's decision to identify the site in the draft Site Allocations Plan and Policy RI 4.</p> <p>In order to better reflect the RAA's aspirations we would request that the Proposal be amended to read as follows: <i>"Retain as sports ground, relocate and upgrade stands and improve existing sports facilities."</i></p> <p>The RAA acknowledge, and accept, that, as part of both a Royal Park and a Conservation Area, the site is a sensitive location. We also welcome and support the Council's Justification of Policy RI 4 – particularly in its acknowledgement that any upgrading of existing facilities could entail some 'enabling' development that will need to have regard to the site's designation as Metropolitan Open Land.</p> <p>Also proposed changes to the Sustainability Appraisal with respect to this site, see at end of Schedule</p>
133	Dale Greetham, Sport England	RI 4 Support, site policies should specifically state that the existing sports facility provision will be protected
170	Sarah Considine, Greater London Authority	TfL looks forward to working with the council to explore these development proposals to assess the impact on the A316 Chertsey Road.

RI 5 Star and Garter Home, Richmond Hill, Richmond

Detailed comments – where respondent gave no indication if supporting or objecting:

Ref. no.	Name/Organisation	Comment
46	Richard Parish, English Heritage	R1 5 Star and Garter This site demonstrates the need for reference to relevant National and Local Policies for listed buildings and their settings to be included within the document and set out in the Meeting Needs Section.

RI 6 Friars Lane Car Park, Richmond

Detailed comments – where respondent gave no indication if supporting or objecting:

Ref. no.	Name/Organisation	Comment
46	Richard Parish, English Heritage	3.11.6 Friars Lane Car Park This site demonstrates the need for reference to relevant National and Local Policies for listed buildings and their settings to be included within the document and set out in the Meeting Needs Section.

E RI 7 Orchard, Garden and Market Roads, Richmond

Detailed comments – where respondent objecting to it:

Ref. no.	Name/Organisation	Comment
160	Steve Hawkes, Managing Director Hamilton Motor Factors Ltd	<p>E RI 7 Orchard, Garden and Market Roads, Richmond, Proposed designation as Key Employment Site</p> <p>3.11 Richmond page 5 (E RI 7 Orchard, Garden and Market Roads, Richmond, Proposed designation as Key Employment Site)</p> <p>At this point in the document there appears to be no way to view or add comment at on page. The map for Orchard Road, Garden Road and Market Roads appears to be unclear as to what areas are included/excluded.</p> <p>Further to various phone calls in the last to the development Framework team regarding the apparent exclusion of the area on the map shown as 'Hydrex House' and 'Factory' along the length of Garden Road. I have been told it has been excluded from these proposals because it is classified as residential. It is however a recent development consisting of 77 residential and 3029 sq mtr offices which as yet are unoccupied (as covered in the planning application of 07/3733/ful). I have been the occupier and freeholder of Hamilton Motor Factors, a warehouse in Market Road, for over 30 years and have watched this industrial area struggle to cope with the new demands on its 1950's infrastructure . Recently the viability of the estate has been severely compromised by residential development. I feel that exclusion of the area on the map shown as 'Hydrex House' and 'Factory' along the length of Garden Road from this plan would further jeopardize the viability of those included, so would conclude that without clarification then the proposal (E RI 7 Orchard, Garden and Market Roads, Richmond, Proposed designation as Key Employment Site plan) is not viable due to the demands of the mixed usage that already exists.</p>

Possible additional site in Richmond suggested by respondents

Ref. no.	Name/Organisation	Comment
137	Matthew Roe, CgMs on behalf of Park Property Developments	<p>NEW SITE</p> <p>KINGS ROAD GARAGE, RICHMOND TW10 6EG (see attached site plan)</p> <p>PROPOSAL</p> <p>Residential</p> <p>JUSTIFICATION</p> <p>The site comprises a vacant former garage located on the corner of Kings Road and Abercorn Mews. The site lies within a predominantly residential area adjacent to existing sensitive land uses including residential and a school. The former use is therefore considered incompatible with the surrounding land uses.</p> <p>The low quality architecture of the existing buildings, which are in a poor state of repair and the dominance of hardstanding for car parking in the front setback means it is an unattractive site within a prominent location which lies within the St Matthias Conservation Area and in close proximity to listed buildings along Sheen Road. Buildings at the site are identified as a negative contributor in the conservation area.</p> <p>The site has been marketed for some time for alternative employment generating uses which has proved the market for such uses is non-existent other than for the re-use of the existing buildings as a car wash. Re-use as a car wash will mean the site will continue to detract from the character and appearance of the conservation area and impact on neighbouring amenity. The floorspace is considered low employment generating, not suitable or viable for conversion to higher density employment uses and therefore considered no longer fit for purpose .</p> <p>Redevelopment for residential use will be designed to reflect the character of the surrounding area and protect neighbourhood amenity whilst enhancing the conservation area and contributing to meeting housing need. The site is wholly suitable for residential development, mindful that it is highly sustainable being a short walk from Richmond Town Centre and Train Station</p>

Ref. no.	Name/Organisation	Comment
		and in an area of predominantly residential character. This view has been reinforced by a recent consultation exercise which has concluded that the overwhelming majority of residents and businesses support the redevelopment of the site for residential. The feedback highlighted a preference for family housing with off street parking provision as part of a traditionally designed scheme that enhances the conservation area.

Other comments re Richmond:

Ref. no.	Name/Organisation	Comment
117	Paul Velluet on behalf of The Old Deer Park Working Group	<p>1. INTRODUCTION</p> <p>1.1 This submission is made by the Old Deer Park Working Group.</p> <p>1.2 The Group comprises representatives 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. In June, 2012 the Group published the report: <i>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.</i></p> <p>1.3 The Group's aim in publishing the report was to provide a positive contribution to discussion and debate in the context of the falling-in and renewal of all but two of the existing leases granted by The Crown Estate for the land comprising the Old Deer Park, Richmond. Details about each of the local groups who made up the Working Group and their objectives were set out in Appendix 1 of the report. Copies of the report were circulated to The Crown Estate, Council members and officers, representatives of the respective lessees, and to English Heritage, and made available to the broader community. Since publication, the findings and recommendations of the report have been discussed at meetings with The Crown Estate and Council members and officers. A copy of the report is available on the Richmond Society's web-site.</p> <p>1.4 This submission follows the formal submission to the Council made by the Working Group in February, 2013 of <i>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 - A submission urging review of boundary definitions, February, 2013</i>, and draws upon that submission.</p> <p>2. THE CONCERNS OF THE OLD DEER PARK WORKING GROUP</p> <p>2.1 The concerns of the Old Deer Park Working Group are set out in three parts: Part I addresses issues relating to the proposal and justification for Proposal RI 1 - Pools on the Park and surroundings, Old Deer Park, Richmond as set out in the draft Site Allocations Plan; Part 2 addresses issues relating to the proposal and justification for Proposal RI 4 – Richmond Rugby, Kew Foot Road, Richmond as set out in the draft Site Allocations Plan; and Part 3 addresses issues relating to the Old Deer Park Car-park, in close proximity and related to the Pools-on-the-Park and Richmond Athletic Ground sites, and the Twickenham Road (A316).</p> <p>2.2 The substantive part of the concerns of the Working Group about each of the three sites relates directly but not exclusively to the significant anomalies in the definitions of boundaries relating to the Old Deer Park shown in the Council's <i>Local Development Framework Proposals Map, Adopted November, 2011</i>, as already highlighted in the Group's submission of February 2013.</p> <p>PART 1 – PROPOSAL RI 1 – POOLS ON THE PARK AND SURROUNDINGS, OLD DEER PARK, RICHMOND</p> <p>P1.1 Despite the location of the Pools-on-the-Park Site at the very heart of the Old Deer Park, the extensive open, landscaped character of the site, the public ownership of the site (through the Council as a lessee of The Crown Estate), public accessibility to</p>

Ref. no.	Name/Organisation	Comment
		<p>the site, and its location within the formally designated Old Deer Park Conservation Area and the buffer zone of the formally inscribed Royal Botanic Gardens, Kew, World Heritage Site, and its forming part of the area included on English Heritage's <i>Register of Parks and Gardens of Special Historic Interest</i> under the grade I entry for the Royal Botanic Gardens, Kew and the Old Deer Park; wholly anomalously and irrationally the site is presently excluded from designation as Metropolitan Open Land and as Public Open Space in the Council's <i>Local Development Framework Proposals Map, Adopted November, 2011</i>.</p> <p>P1.2 Importantly, too, the triangular area of the Park immediately to the north-western boundary of the Pools-on-the-Park Site, bounded on its north-eastern side by the access-road leading to the Royal Mid-Surrey Golf Club and The King's Observatory, and on its north-western side by the public tennis-courts, occupied in part by the public sports changing-rooms and club-room building and the largely redundant and derelict Council maintenance-depot for the Park – both designed and built as integral parts of the original swimming-pool complex - is similarly, anomalously and irrationally excluded from designation as Public Open Space, despite the essential functional association with the public part of the Park immediately adjacent.</p> <p>P1.3 The Working Group drew attention to these serious deficiencies of designation in its formal submission of February, 2013, arguing that the need to remedy such anomalies was urgent and essential. The Group urged the Council to include the Pools-on-the-Park swimming pools complex and its landscaped grounds and adjacent car-park within Metropolitan Open Land and Public Open Space designations.</p> <p>P1.4 The Group was much disappointed by the Council's rejection of such a sound and reasonable request as confirmed in Appendix Three – Results of 'Call for Sites' as first attached to the <i>Report of the Strategic Cabinet Member for Environment, Planning, Parks and Highways</i> as considered by the Council's Cabinet on the 19th September, 2013, and in the documentation attached to the current consultation material.</p> <p>P1.5 The Group considers the Council's stated reason for rejecting its request for remedying each of the anomalous designations on the grounds 'that this would not be appropriate as area is not open' as patently absurd and notes that the this rejection by the Council has been put forward without any proper justification, let alone one based on sound evidence.</p> <p>P1.6 The Group notes that in the Council's Site Assessment for the Site (as attached to the current consultation material) it is suggested 'the designations on this site were considered at the UDP Inquiry and agreed by the Inspector to be appropriate'. However, the relevant part of the Inspector's Report is neither identified nor quoted. It is further suggested that 'the Council does not consider that there have been any changes in circumstances since then which would make the designations inappropriate and therefore does not propose to make any alterations'. Anomalously, such a claim is inconsistent with the significant changes in the policy context since 2004 brought about by publication of <i>The London Plan, 2011</i> and the <i>National Planning Policy Framework</i> in March, 2012, and the implementation of the Council's own LDF programme; and, importantly, the imminent falling-in of the leases of the relevant land.</p> <p>P1.7 Importantly, too, the Council's position is wholly inconsistent with the designation of other, similar, open land within the Borough as shown in the <i>Local Development Framework Proposals Map, Adopted November 2011</i>.</p> <p>P1.8 Once again, the Working Group urges the Council to remedy the serious designation anomalies that presently exist.</p> <p>P1.9 The Working Group also urges the Council to amend the wording of the 'Justification' to establish consistency with current statutory provisions and relevant policy as set out in the <i>National Planning Policy Framework</i> and would suggest the following adjustment to the wording of the third and fourth sentences: '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 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</p>

Ref. no.	Name/Organisation	Comment
		<p>present public sports changing-rooms and club-room building and the largely redundant and derelict Council maintenance-depot for the Park’.</p> <p>P1.10 The Working Group also urges the Council to add the following to the wording of the Justification: ‘Any proposed improvements or additional development should have full regard to the relevant policies set out in The Crown Estate’s <i>The Old Deer Park Richmond - Landscape Strategy, 1999</i>’.</p> <p>PART 2 – PROPOSAL RI 4 – RICHMOND RUGBY, KEW FOOT ROAD, RICHMOND</p> <p>P2.1 The Working Group urges the Council to correct the title and address of the site to ‘The Richmond Athletic Association Ground, Old Deer Park’ in order to properly reflect the long established ownership and diverse outdoor sports use of the site and its comprising an integral part of the Old Deer Park, and to amend the Justification statement in order to properly cover the potential and significant issues arising from the upgrading of the outdoor recreational facilities presently provided on the site.</p> <p>P2.2 The Group considers that the reference to ‘enabling development’ in the Justification should be struck out.</p> <p>P2.3 The Group considers the present wording of the Justification as wholly deficient and suggests the addition of wording along the following lines:</p> <p>‘The Athletic Association Ground contains a listed, late-Victorian sports pavilion/grandstand and is located within the formally designated Old Deer Park Conservation Area and the buffer zone of the formally inscribed Royal Botanic Gardens, Kew, World Heritage Site, and forms part of the land included on English Heritage’s <i>Register of Parks and Gardens of Special Historic Interest</i> under the grade I entry for the Royal Botanic Gardens, Kew and the Old Deer Park.</p> <p>Any proposed improvements or additional development must ensure the preservation of the special interest of the listed pavilion/grandstand and its setting and sustain their significance; preserve or enhance the character or appearance of the conservation area and registered park 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. Only car-parking directly relating to the primary use of the site for recreation purposes shall be permitted and should be extensively landscaped to reflect the significant location of the site within the Park. The potentially adverse effects of any floodlighting of pitches shall be mitigated in order to protect the significance of the site as an integral part of the Old Deer Park and the amenity of nearby local residents’.</p> <p>P2.4 The Working Group also urges the Council to add the following to the wording of the Justification: ‘Any proposed improvements or additional development should have full regard to the relevant policies set out in The Crown Estate’s <i>The Old Deer Park Richmond - Landscape Strategy, 1999</i>’.</p> <p>PART 3 – THE OLD DEER PARK CAR-PARK AND THE TWICKENHAM ROAD</p> <p>P3.1 Whilst not included as a specific site within the <i>Site Allocations Plan</i>, the Old Deer Park Car-park, like the Pools-on-the-Park and the Richmond Athletic Association Ground Sites close by, forms an integral part of the Old Deer Park and is wholly located within the formally designated Old Deer Park Conservation Area and forms part of the area included on English Heritage’s <i>Register of Parks and Gardens of Special Historic Interest</i> under the grade I entry for the Royal Botanic Gardens, Kew and the Old Deer Park. Given the desirability of a coherent approach to the future conservation and enhancement of the Old Deer Park, the Working Group believes that the Council should take the opportunity of remedying the present designation anomalies relating to the Old Deer Park Car-park implicit within the <i>Local Development Framework – Proposals Map – Adopted, 2011</i> in finalising and adopting the <i>Site Allocations Plan</i> and adjusting the <i>Proposals Map</i>.</p> <p>P3.2 The Old Deer Car-park is located in that part of the Old Deer Park closest to The Green and at the principal entry-points to the Park for pedestrians from The Green and Park Lane. It presents an open and partly landscaped character and appearance, enjoys unrestricted public access and is in public ownership (through the Council as a lessee of The Crown Estate).</p>

Ref. no.	Name/Organisation	Comment
		<p>It is located entirely within the formally designated Old Deer Park Conservation Area and forms part of the area included on English Heritage's <i>Register of Parks and Gardens of Special Historic Interest</i> under the grade I entry for the Royal Botanic Gardens, Kew and the Old Deer Park. Despite these major factors, wholly anomalously and irrationally, the entire car-park site is presently excluded from designation as Public Open Space, and the land to the immediate south of the car-park on which the single-storey buildings occupied by the voluntary groups stand, excluded from designation as Public Open Space and Metropolitan Open Land. The latter anomaly is particularly perverse given that the land adjacent to the TA Centre and Richmond Royal Mail Delivery Office only a few yards away on which the single-storey buildings occupied by the British Legion and other voluntary groups stand, is formally designated as Metropolitan Open Land. Importantly, none of the car-parks in the Borough's other major historic parks – Richmond and Bushy Parks are similarly excluded from designation as Public Open Space.</p> <p>P3.3 Similarly, despite the location of the Old Deer Park and the Car-park on the far side of the South-West Trains railway-lines and cutting, quite separate from the heart of the Town beyond The Green; despite the open and partly landscaped character and appearance of the Car-park site; its location within the formally designated Old Deer Park Conservation Area and its inclusion on English Heritage's <i>Register of Parks and Gardens of Special Historic Interest</i> under the grade I entry for the Royal Botanic Gardens, Kew and the Old Deer Park, wholly anomalously and irrationally, the entire car-park site is designated as forming part of the Richmond Town Centre.</p> <p>P3.4 The Working Group drew attention to these serious deficiencies of designation in its formal submission of February, 2013, arguing that the need to remedy such anomalies was urgent and essential. The Group urged the Council to include the entirety of the Old Deer Park Car-park within Public Open Space designation, and the land to the immediate south of the car-park on which the single-storey buildings occupied by the voluntary groups stand, within Metropolitan Open Land and Public Open Space designations; and to remove the Old Deer Park Car-park, the land to the immediate south of the Old Deer Park Car-park extending down towards the railway (on which the single-storey buildings occupied by voluntary groups stand), and the Royal Mail Delivery Office and TA Centre from designation as part of the Town Centre.</p> <p>P3.5 The Group was much disappointed by the Council's rejection of the Group's sound and reasonable request to exclude the Old Deer Park and adjacent land and properties from designation as part of the Town Centre as confirmed in Appendix Three – Results of 'Call for Sites' as attached to the <i>Report of the Strategic Cabinet Member for Environment, Planning, Parks and Highways</i> as considered by the Council's Cabinet on the 19th September, 2013. Curiously, the Council was silent on the Group's requests relating to the need to address other designation issues affecting the Old Deer Park Car-park and adjacent land and properties.</p> <p>P3.6 The Group considers the Council's stated reason for rejecting its request to remove the Old Deer Park and adjacent land and properties from designation as part of the Town Centre on the grounds 'that this is an appropriate designation which was supported by the Inspector at the fairly (sic) DMDPD Inquiry' as wholly questionable. The relevant part of the examiner's report is neither identified nor quoted. Indeed, the Group can find no reference to the issue in the Planning Inspectorate's <i>Report to the London Borough of Richmond upon Thames on the examination into the Development Management Plan</i> of the 12th September, 2011. The Council further suggested that 'since then there has (sic) been no significant changes, so the Council maintains its previous position on this matter'. Anomalously, such a claim is inconsistent with the significant changes in the policy context since 2004 brought about by publication of <i>The London Plan, 2011</i> and the <i>National Planning Policy Framework</i> in March, 2012, and the implementation of the Council's own LDF programme; and, importantly, the imminent falling-in of the leases of the relevant land.</p> <p>P3.7 Like the Pools-on-the-Park Site, the land presently occupied by the Twickenham Road (the A.316) and the essential connections between the north-west and south-east parts of the Park that extend below the road, are excluded from designation</p>

Ref. no.	Name/Organisation	Comment
		<p>as Metropolitan Open Land, despite their significant location within the Park, the extensive open, landscaped character of the land to each side of the road, and their location within the formally designated Old Deer Park Conservation Area and their forming part of the area on English Heritage's <i>Register of Parks and Gardens of Special Historic Interest</i> under the grade I entry for the Royal Botanic Gardens, Kew and the Old Deer Park. However, despite these major factors, wholly anomalously and irrationally, the entire road and essential connections between the north-west and south-east parts of the Park that extend below the road the road and the connections that pass beneath it are presently excluded from designation. Curiously, the Council was silent on the Group's request relating to the need to address the designation issues affecting the Twickenham Road as set out in its submission of February, 2013. Importantly, none of the roads that cross the Borough's other major historic parks – Richmond and Bushy Parks are similarly excluded from designation as Metropolitan Open Land.</p> <p>P3.8 Once again, the Working Group urges the Council to remedy the serious designation anomaly that presently exist.</p> <p>3. CONCLUSION</p> <p>3.1 The Group remains concerned that any failure by the Council to remedy the various designation anomalies identified in Parts 1, 2 and 3 above will continue to leave the relevant areas of the Old Deer Park at significant risk of proposals for substantial built development that will damage the integrity and distinctive character of the Park. As demonstrated by a number of key cases over the last twenty-five years, the Council has shown itself particularly susceptible to accepting the principle of large-scale built development on its own leasehold land within the Park that would have had a damaging impact on the special interest, character, appearance and significance of the Park and the various buildings and structures it contains. In such a context, the Group urges the Council to declare an unambiguous commitment to follow the policies set out in The Crown Estate's <i>The Old Deer Park Richmond - Landscape Strategy, 1999</i>, and to remedy the designation anomalies as a matter of urgency.</p>

Other responses, including on the Sustainability Appraisal

Detailed comments

Ref. no.	Name/Organisation	Comment
4	Rich Geary	<p>My contribution to the consultation is that Planning Documents are only worth having if the Council and members on the Planning Committee abide by them. Otherwise the time spent by officers in drawing up the guidelines is a waste of resources.</p> <p>For example, Victoria Villas/ Dee Road/ Crown Terrace/ Sheendale Road TW9 is a Conservation Area. The Area Plan deemed that no buildings could be built in this area over three stories in height. About seven years ago a developer was given permission for a four storey building. Before the planning meeting I spoke to five of the planning committee members who all said that they would oppose the application. A Sheendale Road resident set up an Action Group and nineteen local residents registered objections at the time and several spoke at the Planning meeting. The objections included that residents would be overlooked, increased traffic, parking problems and that there was no demand for more office space.</p> <p>Come the meeting and the application was passed unanimously. Most of the committee members conveniently didn't bother to turn up in time for the discussion at 7pm. One of those who had told me he would oppose the application chaired the Committee that evening and voted in favour. At the meeting he stated that he could see no reason to refuse permission! Obviously after our conversation the developer had been very persuasive in private.</p> <p>How is it that when we applied to park our car in our front garden we were refused because we live in a Conservation area but</p>

Ref. no.	Name/Organisation	Comment
		<p>such considerations do not apply to developers? Local democracy only exists if the Council represents local residents. Area/ Site Allocation Plans and Planning Documents are pointless and a waste of residents' council tax if they are ignored at the behest of developers whose interest is solely to make a fast buck.</p>
37	Julian Austin, AMEC on behalf of National Grid	<p>National Grid has appointed AMEC to review and respond to development plan consultations on its behalf. We are instructed by our client to submit the following representation with regards to the current consultation on the above document.</p> <p>Overview – National Grid National Grid is a leading international energy infrastructure business. In the UK National Grid's business includes electricity and gas transmission networks and gas distribution networks as described below.</p> <p>Electricity Transmission National Grid, as the holder of a licence to transmit electricity under the Electricity Act 1989, has a statutory duty to develop and maintain an efficient, co-ordinated and economical transmission system of electricity and to facilitate competition in the supply and generation of electricity. National Grid operates the national electricity transmission network across Great Britain and owns and maintains the network in England and Wales, providing electricity supplies from generating stations to local distribution companies. We do not distribute electricity to individual premises ourselves, but our role in the wholesale market is key to ensuring a reliable and quality supply to all. National Grid's high voltage electricity system, which operates at 400,000 and 275,000 volts, is made up of approximately 22,000 pylons with an overhead line route length of 4,500 miles, 420 miles of underground cable and 337 substations. Separate regional companies own and operate the electricity distribution networks that comprise overhead lines and cables at 132,000 volts and below. It is the role of these local distribution companies to distribute electricity to homes and businesses. To facilitate competition in the supply and generation of electricity, National Grid must offer a connection to any proposed generator, major industry or distribution network operator who wishes to generate electricity or requires a high voltage electricity supply. Often proposals for new electricity projects involve transmission reinforcements remote from the generating site, such as new overhead lines or new development at substations. If there are significant demand increases across a local distribution electricity network area then the local network distribution operator may seek reinforcements at an existing substation or a new grid supply point. In addition National Grid may undertake development works at its existing substations to meet changing patterns of generation and supply.</p> <p>Gas Transmission National Grid owns and operates the high pressure gas transmission system in England, Scotland and Wales that consists of approximately 4,300 miles of pipelines and 26 compressor stations connecting to 8 distribution networks. National Grid has a duty to develop and maintain an efficient co-ordinated and economical transmission system for the conveyance of gas and respond to requests for new gas supplies in certain circumstances. New gas transmission infrastructure developments (pipelines and associated installations) are periodically required to meet increases in demand and changes in patterns of supply. Developments to our network are as a result of specific connection requests e.g. power stations, and requests for additional capacity on our network from gas shippers. Generally network developments to provide supplies to the local gas distribution network are as a result of overall demand growth in a region rather than site specific developments.</p> <p>Gas Distribution National Grid also owns and operates approximately 82,000 miles of lower-pressure distribution gas mains in the north west of</p>

Ref. no.	Name/Organisation	Comment
		<p>England, the west Midlands, east of England and north London - almost half of Britain's gas distribution network, delivering gas to around 11 million homes, offices and factories. National Grid does not supply gas, but provides the networks through which it flows. Reinforcements and developments of our local distribution network generally are as a result of overall demand growth in a region rather than site specific developments. A competitive market operates for the connection of new developments.</p> <p>National Grid and Local Development Plan Documents</p> <p>The Energy White Paper makes clear that UK energy systems will undergo a significant change over the next 20 years. To meet the goals of the white paper it will be necessary to revise and update much of the UK's energy infrastructure during this period. There will be a requirement for:</p> <ul style="list-style-type: none"> _ an expansion of national infrastructure (e.g. overhead power lines, underground cables, extending substations, new gas pipelines and associated installations); and _ new forms of infrastructure (e.g. smaller scale distributed generation, gas storage sites). <p>Our gas and electricity infrastructure is sited across the country and many stakeholders and communities have an interest in our activities. We believe our long-term success is based on having a constructive and sustainable relationship with our stakeholders. Our transmission pipelines and overhead lines were originally routed in consultation with local planning authorities and designed to avoid major development areas but since installation much development may have taken place near our routes. We therefore wish to be involved in the preparation, alteration and review of Development Plan Documents (DPDs) which may affect our assets including policies and plans relating to the following issues:</p> <ul style="list-style-type: none"> _ any policies relating to overhead transmission lines, underground cables or gas pipeline installations; _ site specific allocations/land use policies affecting sites crossed by overhead lines, underground cables or gas transmission pipelines; _ land use policies/development proposed adjacent to existing high voltage electricity substation sites and gas above ground installations; _ any policies relating to the diverting or undergrounding of overhead transmission lines; _ other policies relating to infrastructure or utility provision; _ policies relating to development in the countryside; _ landscape policies; and _ waste and mineral plans. <p>In addition, we also want to be consulted by developers and local authorities on planning applications, which may affect our assets and are happy to provide pre-application advice. Our aim in this is to ensure that the safe and secure transportation of electricity and gas is not compromised. National Grid infrastructure within the London Borough of Richmond upon Thames's administrative area.</p> <p>Electricity Transmission</p> <p>National Grid's high voltage electricity overhead transmission lines / underground cables within the London Borough of Richmond upon Thames's administrative area that form an essential part of the electricity transmission network in England and Wales include the following:</p> <ul style="list-style-type: none"> _ 275kV underground cable running from Laleham substation in Spelthorne to Ealing substation in Ealing _ 275kV underground cable running from Willesden substation in Ealing to Wimbledon substation in Merton <p>National Grid has provided information in relation to electricity transmission assets via the following internet link: http://www.nationalgrid.com/uk/LandandDevelopment/DDC/GasElectricNW</p> <p>Gas Transmission</p>

Ref. no.	Name/Organisation	Comment
		<p>National Grid has no gas transmission assets within the administrative area of London Borough of Richmond upon Thames.</p> <p>Electricity Distribution</p> <p>UK Power Networks (UKPN) owns and operates the local electricity distribution network whilst Southern Gas Networks owns and operates the local gas distribution network in the administrative area of Richmond upon Thames. Contact details can be found at www.energynetworks.org.</p> <p>Further Advice</p> <p>National Grid is happy to provide advice and guidance to the Council concerning our networks. If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us. In addition the following publications are available from the National Grid website or by contacting us at the address overleaf:</p> <ul style="list-style-type: none"> _ National Grid's commitments when undertaking works in the UK - our stakeholder, community and amenity policy; _ specification for Safe Working in the Vicinity of National Grid High Pressure Gas Pipelines and Associated Installations - Requirements for Third Parties; and _ A sense of place - design guidelines for development near high voltage overhead lines. <p>Please remember to consult National Grid on any Development Plan Document (DPD) or site-specific proposals that could affect our infrastructure.</p>
46	Richard Parish, English Heritage	<p>Thank you for the opportunity to comment on the Pre-publication Site Allocations Plan and Pre-publication Site Allocation Sustainability Appraisal Progress Report for the London Borough of Richmond. As the Government's statutory adviser on the historic environment we are keen to ensure that the conservation and enhancement of the historic environment is fully taken into account in the development of the borough's planning policy. Accordingly, we have reviewed your consultation in light of the National Planning Policy Framework (NPPF) which requires, as one of its core principles, that heritage assets be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations.</p> <p>Local Plan Site Allocations Plan General</p> <p>A core principle of the National Planning Framework is a plan-led framework which provides a practical framework within which planning applications can be made with a high degree of predictability and efficiency. As such site allocations represent a major opportunity to provide greater certainty for sites through the setting of clear parameters for design and local context.</p> <p>Having reviewed the submitted document we are concerned that there is little or no reference to the relevant policies in respect of good design or conserving and enhancing the historic environment as set out in the NPPF. Given that the SA Plan proposals set out to "reflect the needs of the Borough, existing National, Regional and local policies, site specific constraints and opportunities" we consider this omission needs to be rectified. We therefore strongly recommend that Section 2.</p> <p>Meeting Needs sets out the Council's requirements and vision for Cultural Heritage in respect of designated and undesignated heritage assets and archaeological considerations, in the manner adopted for Housing, Retail etc. Such a section should include the Council's vision, relevant studies or research, and relevant national and local policy and guidance. We would recommend that a section incorporating Cultural Heritage is also set out in the Sustainability Appraisal (Sept 2013). The headings as currently set out do not offer an obvious location for all relevant types of Cultural Heritage, including archaeology, World Heritage Sites, conservation areas.</p> <p>We would strongly suggest that the guidance accompanying each allocation should provide sufficient clarity for landowners and potential developers, highlighting key issues and potential requirements and opportunities to be considered at the planning application stage. This is also relevant where designation as a Key Employment Site has been identified as in general these</p>

Ref. no.	Name/Organisation	Comment
		<p>include no Justification text. We acknowledge that in many instances, as identified at 2.4.15, that the relevant policies are to restrict changes. However, where replacement of existing building stock with new may be appropriate this would benefit from an indication as such or reference to relevant design policy. If the vision is for no physical change then it would also be helpful to confirm this in the relevant site allocation.</p> <p>I have not sought to address this in all the site allocations but have set out below where there are heritage concerns/opportunities which would benefit from clarification or further consideration.</p>
116	Silas Willoughby, Surrey County Council	Thank you for consulting Surrey County Council on the London Borough of Richmond Site Allocation Plan. We have no comments to make on this document at this stage as we consider that the sites included in the document are unlikely to have any impact on infrastructure or services in Surrey.
119	Piotr Behnke, Natural England	<p>Thank you for your consultation on the above dated 30 September 2013.</p> <p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>Site Allocations – Pre Publication:</p> <p>The sites which have been identified within this site allocations plan are few in number however they are, in some instances in relatively close proximity to a number of different protected sites. These include, for instance, Richmond Park, Wimbledon Common, South West London Waterbodies and Syon Park, whose designations include Sites of Special Scientific Interest (SSSI), Special Areas of Conservation (SAC), Special Protection Areas (SPA) as well as RAMSAR sites. Provided that the sites are taken into account when the assessment is made of whether the site allocations are going to be feasible and either on their own or in combination the proposals would not have likely significant effects then they can certainly proceed, as long as good reasoning is given for progressing them.</p> <p>The sites whose development impacts will need to be looked at in more depth (given location and possible extent of proposals) would be the following:</p> <ul style="list-style-type: none"> HA 1 Hampton Square HA 2 Hampton Water Treatment Works HA 3 Beveree, Richmond and Hampton Football Club HA 5 Platts Eyot, Lower Sunbury Road TD 4 Teddington Studios, Broom Road TW 8 Harlequins Rugby, Langhorn Way TW 9 Central Depot, Langhorn Way TW 10 Richmond upon Thames College, Egerton Road TW 14 Rugby Football Union, Whitton Road BA 1 Barn Elms, Queen Elizabeth Walk, Barnes BA 2 Barnes Hospital, South Worple Way, Barnes EM 1 Stag Brewery, Lower Richmond Road, Mortlake HP 1 HM Latchmere Prison, Church Road, Ham HP 2 Ham Central Area, Ham RI 1 Pools on the Park and surroundings, Old Deer Park RI 2 Richmond Station and above track RI 5 Star and Garter Home, Richmond Hill <p>The sites listed here are all either large enough or close enough to one or other of the designated sites listed above and would</p>

Ref. no.	Name/Organisation	Comment
		need to be considered carefully in order that the re-development on these sites did not have an impact upon any of the site features. It is possible that most could well be re-developed with the provision of good new residential or commercial opportunities, however the provision of Green Infrastructure (GI) and the use of Sustainable Urban Drainage Systems (SUDS) within these allocation sites would be encouraged and welcomed by Natural England.
126	Carmelle Bell, Savills on behalf of Thames Water	<p>Thames Water are the statutory water and sewerage undertaker for the Borough and we have the following comments on the Allocations Plan:</p> <p><u>Section 3 The Sites – general Comments on Water Supply and Waste Water Infrastructure</u></p> <p>Due to limited information on the size of proposed developments and the complexities of water and sewerage networks, Thames Water are unable to clearly determine the infrastructure needs at this stage.</p> <p>Thames Water have previously met with the Council regarding the draft proposals and indicated that there is no known strategic sewer capacity or sewer flooding problems or water supply issues. However, if a large unknown/windfall site were to come forward unexpectedly (either in Richmond or adjoining Boroughs), then there may potentially be some strategic issues.</p> <p>Although, there are no known current strategic water/wastewater infrastructure issues, in some cases it is likely that new water and sewerage/drainage infrastructure would be required off site to ensure sufficient capacity is brought forward ahead of the development. In the first instance a water supply/drainage appraisal and report would be required from the developer to determine the exact impact on Thames Water's infrastructure and the significance of the new infrastructure required to support the development. It should be noted that in the event of an upgrade being required to Thames Water's sewerage infrastructure, up to three years lead in time will be potentially necessary for the delivery of the infrastructure; alternatively the developer may wish to requisition the infrastructure to deliver it sooner.</p> <p>Thames Water would therefore welcome the Council's support by including appropriate reference to Policy DM SD 10 Water and Sewerage Provision in the Allocations Plan and also the attaching of Grampian planning conditions on any planning approvals ensuring delivery of necessary water/sewerage infrastructure ahead of occupation.</p>
141	David Hussey for Highways Agency	We have reviewed the Pre-publication SA DPD and have no comments to make at this time. We look forward to continuing to engage with you in future as you progress your local plan.
170	Sarah Considine, Greater London Authority	<p>Overall, subject to addressing the matters identified above, TfL considers this document to be in general conformity with London Plan transport policies.</p> <p>Following adoption of this Site Allocation Plan, TfL (Borough Planning) requests that it be consulted directly on all planning applications referable to the GLA (under the Mayor of London Order 2008). TfL also requests that it be consulted on applications which are located on the Transport for London Road Network, or where they are within, or adjacent to, TfL infrastructure, for example bus or rail/ Underground networks. This is to ensure that development is acceptable in strategic transport terms, and impacts are appropriately mitigated in line with London Plan policy. To support this process future applicants are advised to refer to TfL's transport assessment best practice guidance (April 2010), and to make use of TfL's pre application advice service, or to contact the Borough Planning team directly (further information is available on TfL's website)</p> <p>The Mayor will issue his formal opinion on general conformity when requested at the pre-submission stage. However, I hope that the concerns raised at the current stage can be resolved before then, through continuing informal discussions with Council officers. Please do contact Sarah Considine to discuss the issues raised in this letter further. For transport matters, please contact Andrew Dorrian (020 3054 7045).</p>
104	Charles Muriithi, Environment Agency	Thank you for consulting the Environment Agency on the above which we received on 1 October 2013. We are pleased to note that the Site Allocation Plan has undergone initial appraisal and consultation, including Strategic Flood Risk Assessment (SFRA).

Ref. no.	Name/Organisation	Comment									
		<p>A large proportion of the borough is situated in proximity to the River Thames and its tributaries and therefore a large number of properties within the borough are potentially at risk of flooding from rivers</p> <p>The Sustainability Appraisal Report acknowledges that some sites are within flood risk areas, where new and/or intensified uses could potentially put more users/residents at risk of flooding. We welcome the Sustainability Appraisal Report coverage of flood risk from paragraphs 3.2.49- 3.2.52 and look forward to the SFRA review. We would wish to see the review aligning with the Environment Agency Thames Estuary 2100 (TE2100) Plan which was approved by DEFRA in November 2012.</p> <p>Strategic Flood Risk Assessment (SFRA) Review</p> <p>We will support the London borough of Richmond upon Thames with interpretation of TE2100 data and information as required to ensure the revision of the borough SFRA and flood plans are developed with an understanding of TE2100 analysis and recommendations. We hope the London Borough of Richmond upon Thames will support the flood risk management measures identified by the TE2100 Plan.</p> <p>We welcome the Local Plan requirement that development in unsustainable locations, such as in areas with high flood probability should not be promoted, and should not allow development that might increase the risk of flooding to others. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, including through the planning of green infrastructure</p> <p>Thames Estuary 2100 (TE2100) Plan</p> <p><u>TE2100 Policy Unit – Richmond</u></p> <p>Richmond lies in the Richmond, Twickenham and Barnes and Kew policy units. Each policy unit has been assigned a policy which determines how flood risk will be managed in the future. The selected policy for Richmond is policy P3 and P5. See the table below for more detail.</p> <table border="1" data-bbox="573 807 2085 1150"> <thead> <tr> <th data-bbox="573 807 965 871">Policy unit</th> <th data-bbox="965 807 1137 871">Flood risk policy</th> <th data-bbox="1137 807 2085 871">What this means...</th> </tr> </thead> <tbody> <tr> <td data-bbox="573 871 965 995">Barnes & Kew</td> <td data-bbox="965 871 1137 995">P5</td> <td data-bbox="1137 871 2085 995">To keep up with climate change and reduce flood risk further, we and others will need to do more to manage and reduce both the likelihood and consequence of flooding, providing a level of flood risk management which is higher still than the standard currently provided.</td> </tr> <tr> <td data-bbox="573 995 965 1150">Richmond Twickenham</td> <td data-bbox="965 995 1137 1150">P3</td> <td data-bbox="1137 995 2085 1150">In the future, areas of unprotected floodplain in west London will flood more frequently as water levels rise. The Thames Barrier will continue to provide tidal flood protection to the same high standard as the rest of London. But over the next 25 years we need to put in place new ways of managing fluvial flooding other than operating the Thames Barrier.</td> </tr> </tbody> </table> <p>Land Requirements for Richmond</p> <p>All Policy Units will require land for the following purposes:</p> <ul style="list-style-type: none"> • Along the existing defence lines for inspection, maintenance and repair. • Additional land along the existing defence line where defences are to be raised. <p>This includes all the existing tidal flood defences that are to be raised except where defences are realigned.</p> <p>Additional requirements for Richmond Policy Unit are listed below.</p> <p><u>Richmond</u></p> <ul style="list-style-type: none"> • The local choices include local defence realignment. If defences are to be realigned, space will be needed along the new 	Policy unit	Flood risk policy	What this means...	Barnes & Kew	P5	To keep up with climate change and reduce flood risk further, we and others will need to do more to manage and reduce both the likelihood and consequence of flooding, providing a level of flood risk management which is higher still than the standard currently provided.	Richmond Twickenham	P3	In the future, areas of unprotected floodplain in west London will flood more frequently as water levels rise. The Thames Barrier will continue to provide tidal flood protection to the same high standard as the rest of London. But over the next 25 years we need to put in place new ways of managing fluvial flooding other than operating the Thames Barrier.
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Richmond Twickenham	P3	In the future, areas of unprotected floodplain in west London will flood more frequently as water levels rise. The Thames Barrier will continue to provide tidal flood protection to the same high standard as the rest of London. But over the next 25 years we need to put in place new ways of managing fluvial flooding other than operating the Thames Barrier.									

Ref. no.	Name/Organisation	Comment
		<p>alignment for the defence and an access route.</p> <ul style="list-style-type: none"> • Secondary defences may be suitable for specific locations (e.g. Ham House). <u>Twickenham</u> • The local choices include local defence realignment. If defences are to be realigned, space will be needed along the new alignment for the defence and an access route. • Secondary defences may be suitable for specific locations (e.g. Syon House). <ul style="list-style-type: none"> • Land for works on the tributaries, including potential fluvial flood storage on the Crane. <u>Barnes & Kew</u> • The local choices include local defence realignments. If defences are to be realigned, space will be needed along the new alignment for the defence and an access route. • Land for fluvial flood management on Beverley Brook including flood storage and improved defences. <p>Richmond Site Allocations</p> <p>A number of the proposed sites are within flood zones 2 and 3. The Environment Agency would wish to ensure these sites have been suitably appraised in regard to the sequential approach and exception test. We would recommend that the proposed use class for each of the sites does not represent an increase in the vulnerability classification.</p> <p>The following sites do appear to move to a higher vulnerability:</p> <p>Mortlake: EM1, EM4, Kew: KW1, KW3, Richmond: RI6</p> <p>Each site would require a detailed Flood Risk Assessment (FRA)</p>
46	Richard Parish, English Heritage	<p>Sustainability Appraisal</p> <p>English Heritage's published guidance on sustainability appraisals sets out the need for a robust framework for the historic environment. Whilst we consider the sustainability appraisal to be sound in its assessments heritage concerns to have been identified in the commentaries, in general we consider it preferable to incorporate cultural heritage as a separate objective within the sustainability process, clearly setting out indicators which incorporate the full range of heritage assets potentially affected including listed buildings, WHS, Registered Parks and Gardens Scheduled Monuments and archaeology. The inclusion within Landscape and townscape/parks and gardens in the submitted document does not appear to a sufficiently broad or clear identification of heritage indicators to indicate whether these will be adversely affected. As such we would direct you to our published guidance, Strategic Environmental Assessment, Sustainability Appraisal and the Historic Environment published in July 2013.</p>
106	Huw Williams, CgMs on behalf of Richmond Athletic Association	<p>Sustainability Appraisal re RI 4</p> <p>In preparing these representations we have also reviewed the Sustainability Appraisal accompanying the draft Plan and specifically the Appraisal of the RAA site (on pages 197-199). We believe the Council's assessment of Option A: Retain the Status Quo underestimates the potential effects that the failure to improve existing facilities on the RAA site would have on the local area in the medium/long term. The attached Annex contains an amended Appraisal of this Option setting out what we believe would be the effects of retaining the status quo. It is acknowledged that although this, in itself, does not alter the Council's overall assessment that Option B should be preferred it does, we believe, provide a more accurate assessment of the likely consequences of the retaining the status quo and also helps to differentiate this option from the preferred one to retain the existing sports ground and upgrade the facilities. (annexe attached which gave their changes) – see below</p>

Annex to response by 106, Huw Williams, CgMs on behalf of Richmond Athletic Association

Proposal Site: Richmond Rugby							
Option A: Retain Status Quo							
SA Objectives	Geographic Scale		Assessment/Length of Effect			Cumulative	Commentary / Explanation, uncertainties, proposed mitigation
	Local	Trans-boundary	Short-Term	Medium-Term	Long-Term		
1. Waste							Neutral
2. Pollution & soil							Neutral
3. Travel							Neutral
4. Climate Change Mitigation	-		-	-	-		The shortcomings of existing facilities in terms of thermal efficiency, energy use, etc. would increase
5. Climate Change adaptation, flood risk & water	-		-	-	-		Existing deficiencies would be exacerbated
6. Biodiversity							Neutral
7. Landscape & Townscape	-			-	-		Dilapidation of existing buildings/structures could harm appearance of site and setting
8. Parks & Open Spaces	-			-	-		Deterioration of existing facilities buildings/structures would make site less attractive as recreation facility
9. Best Use of Sustainable Construction							Neutral
10. Housing							Neutral
11. Health well-being, secure communities	-			-	-		Existing facilities are unlikely to be able to continue make full contribution towards the provision of leisure service and promotion of healthy lifestyles
12. Accessible Local Services							Neutral
13. Town Centres							Neutral
14. Local Economy							Neutral
15. Commercial Development Opportunities							Neutral
Summary of Assessment (<i>likely sustainability impact of the option</i>)							
Potential negative impacts would arise as existing facilities continue to deteriorate. This could not only have a negative effect on the appearance of the site but also reduce its attractiveness as a destination for leisure and recreational use and future needs and demands for local sporting provision increase.							
Possible Mitigation (<i>measures to mitigate likely negative effects and enhance positive effects</i>)							
Not applicable							