

Local Plan – All Responses to Consultation on Proposed Main Modifications 22 December 2017 to 2 February 2018

MM Rep No.	Respondent Name	MM(s) commenting on	Comment	Officer response
1	David Holmes, Progress Planning	MM19 Offices	<p>Your Reference: Minor Modifications Consultation (MM 19 Offices) RE: Minor Modifications Consultation - 38 - 42 Hampton Road Teddington Further to the review of the Minor Modifications, published by the Council for comment on the 22nd December 2017. We have reviewed the documents and have the following comments to make.</p> <p>No. 38 – 42 Hampton Road, Teddington is still listed as a Key Office Area, this is despite the Office use ceasing. The residential conversion is almost complete, with the use set commence in May 2018 (at the latest). The National Planning Policy Framework, under paragraph 22, states that: <i>“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”[Emphasis added]</i>. As the conversion is substantially complete, there is no reasonable prospect of the site being used for Employment (B1(a)) purposes.</p> <p>As such the continuation of the proposed allocation, through to adoption, is not sound and such, threatens compliance with para 182 of the NPPF. Specifically the allocation is not consistent with National Planning Policy.</p> <p>To that end we request that the 38 – 42 Hampton Road, Teddington, is removed from the allocation of Key Office Areas, which is vital to meet the tests of soundness as established by the Framework.</p>	<p>The Council’s position remains as set out at Examination on Key Office Areas. The Key Office Area for 38-42 Hampton Road is a wider site, which includes the land adjacent to the conversion which has recently been subject to a planning application (17/3596/FUL).</p>

2	David Mattes	MM2 Heritage Assets, MM4 Building Heights, MM16 Health and Well Being, MM17 Open Space and Recreation, MM23 Site Allocations	<p>I would like to comment on 6 of the Main Modifications to the Local Plan as follows:</p> <p>1) A minor comment: The modification to page 28 on 'Local Character and Design Quality' contains an admirable new concept of 'Conversation Areas'. However, I strongly suspect the intention was to refer to 'Conservation Areas'.</p> <p>2) The modification to page 31 on 'Building Heights', Policy LP 2 Criterion 1, says that to be acceptable the proposals must have a "wholly positive" impact on the character and quality of the area. This would mean that if the proposals had a 99% positive and 1% neutral or negative impact, they would be rejected. Surely that is not the intention? I suggest "wholly" be replaced by "largely" or "overwhelmingly".</p> <p>3) A minor comment: The modification to page 108 on 'Health and Wellbeing', Policy LP 30 in paragraph 8.3.13 includes the words "have the potential". They should grammatically say "has the potential".</p> <p>4) The modification to page 108 on 'Health and Wellbeing', Policy LP 30 in paragraph 7.2.10 uses the phrase "to support the promotion of healthy foods to school-age children." But what is a healthy food for some children (eg: underweight children) may be unhealthy for other children (eg: obese children). What this modification should say is: "to support the promotion of a healthy</p>	<p>Typo will be corrected.</p> <p>The use of the term 'wholly' was taken from the deleted criterion 6. Given the vulnerability of large areas of Richmond to the harmful impact of tall buildings, wording that potentially lessens the requirements placed on development proposals to deliver a positive impact on the character and quality of the area, such as 'largely', would not be acceptable.</p> <p>Typo can be corrected.</p> <p>Not considered a significant issue in the implementation of planning policy, for wider Public Health strategies to address.</p>
---	---------------------	--	--	--

		<p>diet [or 'healthy nutrition'] for school-age children."</p> <p>5) In the modification to page 111 on 'Public Open Space, Play Space, Sport and Recreation', Policy LP 31 in the Amended Criterion 3 of Part B, there is a <u>requirement</u> that where on-site provision of "new playing field and ancillary facilities is not feasible or practicable, the council <u>will expect</u> existing surrounding" Public Open Space or play space to be improved, etc. Often the attraction of such Public Open Spaces is their wild, natural character – nature in the raw rather than nature splattered with manmade accessories. These issues about changing the nature of Public Open Spaces should always be decided on a case-by-case basis, taking local conditions and views into account. Therefore, words such as 'require' and 'expect' should be replaced by some less dogmatic wording that acknowledges the need to consider this option but to decide each case on its merits.</p> <p>6) In the modification to page 186, SA 24 on 'Stag Brewery', penultimate bullet, the investigation of the relocation of the bus stopping/turning facility for the Avondale Bus Station should <u>specifically</u> state that it does not involve an option to re-route the buses in such a way that they no longer stop at the bus stop adjacent to Avondale Bus Station. Being close to the pedestrian bridge over the railway line, this is a significant bus stop because it is used by many pedestrians (both from the local communities and other parts of the borough) to link places on the 209 bus route with the area north of the railway line and vice versa. Removing bus access from the immediate vicinity of the bridge would accentuate the 'north-south' divide, destroy an</p>	<p>Noted. The Council expects the impact of new development to be mitigated through provision, whether on- or off-site. This wording is considered necessary to provide clarity to developers with regard to this expectation. The implementation of this would be determined on a case-by-case basis, including the consideration of local conditions and views, and in accordance with other policies. The modification, agreed with Sport England, does not introduce this requirement, but rather seeks to clarify that it applies to 'playing fields and associated sports facilities' in addition to Public Open Space and play space.</p> <p>The possibility of relocating the Avondale Road Bus station was identified in the Planning Brief and remains the Council's position. This will be investigated as part of the comprehensive redevelopment.</p>
--	--	--	--

			important pedestrian transport link, upset local residents and others who regularly use the 209 bus and make only about 2 minutes' difference to the journey time of a bus that terminates at any new bus station on the Stag Brewery site.	
3	Transport for London	MM21 Parking, MM23 Site Allocations	<p>I write following receipt of the notification that the London Borough of Richmond upon Thames has undertaken consultation on the Main Modifications to the Local Plan.</p> <p><i>Please note that these comments represent an officer level view from Transport for London and are made entirely on a 'without prejudice' basis. They should not be taken to represent an indication of any subsequent Mayoral decision in relation to this matter. These comments also do not necessarily represent the views of the Greater London Authority, which has been consulted separately. The comments are made from TfL's role as a transport operator and highway authority in the area and do not necessarily represent the views of TfL's commercial property team who may respond separately.</i></p> <p>Some reference is made to the draft new London Plan in the following comments, which has been published for consultation. Although the Local Plan (and Main Modifications) has been reviewed with respect to the current London Plan, a consideration of the draft new London Plan policy would 'future proof' the Plan.</p> <p>Car Parking</p> <p>TfL is concerned with the proposed wording in MM21. To comply with the London Plan policy 6.13 (and draft New London Plan policy T6), the emphasis should be to promote reduced parking, or car-free development, where appropriate. The wording should be amended to this effect.</p> <p>The London Plan does not support a requirement for car parking provision in new development, and as such the proposed wording in MM21 should be clear that parking standards are set</p>	<p>Consider very limited weight should be given to the draft London Plan at this stage as it still has to go through the public consultation and Examination processes.</p> <p>The Council's position remains as set out at Examination, considered justified by robust evidence. This promotes sustainable transport choice as a package of policy measures.</p>

			<p>as maximum criteria. For full compliance the wording should be changed to: <i>“In general it is expected that in PTAL areas of 0-1 the standards should be met”</i>.</p> <p>The current wording could undermine the Mayor’s target of 80% of all trips in London to be made by foot, cycle or public transport by 2041 (draft New London Plan policy T1A). Outer London boroughs will play a crucial role in meeting this target.</p> <p>Site Allocations TfL will continue to engage with the Council and the developer to determine the appropriate level of mitigation required, with regards to Site Allocation SA24 (MM23). In terms of the bus stopping and routing arrangements, the proposed wording should be amended as follows: <i>“The opportunity for a bus route to terminate/turn around at this site should be investigated as part of the comprehensive redevelopment”</i>. The viability of the options to provide this will be considered by TfL.</p>	<p>Object to this amended wording, which has not been discussed with officers. The possibility of relocating the Avondale Road Bus station was identified in the Planning Brief and remains the Council’s position.</p>
4	Port of London Authority	MM9 River Corridors	<p>Thank you once again for providing the Port of London Authority further opportunity to review the draft Local Plan, in this instance on the proposed modifications to the Local Plan.</p> <p>Previous representation from the PLA advised of the need to see evidence that supports the need to provide new public access to the foreshore. Following on from discussions, and the entering into a Statement of Common Ground with the Council, the PLA is pleased to see that the agreed changes to Policy LP 18 have been incorporated into the document. Specifically, the cautious approach needed in addressing access to the foreshore has been taken and applied to Policy LP 18, and the rewording shown on pages 13 and 14 of the consultation document is acceptable. Policy LP 18 has also been given a new criterion, which seeks to address the matter of riparian lifesaving equipment. Riverside safety is of paramount importance to the PLA, and is one of many key objectives set out within the</p>	<p>Noted.</p>

			<p>Thames Vision. We are pleased to see this forming part of the proposed policy for river corridors.</p> <p>Notwithstanding the above however, previous observations from the PLA also picked up on the Council's 'presumption against houseboats' within Policy LP 19. This did not appear to reflect the aspiration within the 'Evidence Box', which stated that any new proposals for houseboats, moorings and other floating structures must safeguard the character and openness of the River'. Whilst this is supported by the PLA, it gives the impression that applications for such river based development <u>would</u> be considered (despite the presumption against them) and must demonstrate that they would not adversely affect the character of the river/riverside. Clarity is sought on this matter. I also cannot find where the definitions for residential houseboats, residential moorings and temporary/permanent moorings has been provided (a matter picked up in our previous representations to you)?</p> <p>There are no further observations with regard to the proposed modifications, although clarity on the above-mentioned matters is requested.</p>	<p>Response as set out previously in LBR-LP-002 comment ID 197.</p>
5	Peter Eaton on behalf of Mortlake Brewery Community Group	MM23 Site Allocations	<p>I write on behalf of the Mortlake Brewery Community Group (MBCG), in relation to consultations on the Proposed Main Modifications to the Local Plan. Our comments relate specifically to the Site Allocations SA 24 Stag Brewery and LP 14.</p> <p>At the Hearing last year several representatives of the MBCG made a number of comments on the Publication version of the Local Plan and we are pleased to see many of the points we raised have been incorporated into your proposed modifications. We confirm our comments on the proposed modifications as follows:</p> <p>Air Quality - Pg 186 We strongly support the addition of this new bullet point related</p>	<p>Support for a number of Main Modifications noted.</p> <p>The Council's position remains, as the Council's proposed changes following the hearings are reflected in the Main Modifications. MM23 is considered to set out the context for 'reprovision' of the playing fields.</p>

		<p>to mitigation measures in terms of air quality.</p> <p>Transportation /Highways - Pg 186 We strongly support the proposed modifications to the wording of this penultimate bullet point. With regards the last part of the modification related to the bus stopping/turning facility we propose a revision to the wording as follows: add at the end of the sentence - " Any such facility, if to be implemented, should have no detrimental effect on the current OOLTI land in the south west part of the site"</p> <p>Adopted Development Brief - Pg 186 We strongly support the proposed modification which now makes it completely clear that the Planning Brief for the Stag Brewery site, Adopted July 2011 retains its status in full and that any development scheme has to have due regard to this adopted SPD.</p> <p>Archaeology - Pg 186 We strongly support the revised wording including now the reference to the site being within an Archaeological Priority Area.</p> <p>OOLTI Land in South West part of the Stag Site - Pg 186 You will recall that this was the subject of much discussion at the Hearing and was inter-linked with the comments our representatives made in relation to the potential confusion as to whether the Adopted SPD would still be the relevant document to direct any development scheme. The Council representatives agreed to revisit the wording of this bullet point to take on-board our concerns related to protection of the important part of the site and its contribution as OOLTI designated land to the character of the area. Although the proposed modification goes some way to acknowledging our comments, with a triple-protection compared</p>	
--	--	--	--

			<p>to the unqualified reference included in the final consultation draft, it is still both confusing and indeed contradictory in relation to clauses in the Adopted Development Brief and accepted definition of OOLTI land.</p> <p>Consequently we do not agree with the proposed modification wording. We set out below our observations and logic as to why we would find this modification unsound.</p> <ul style="list-style-type: none"> • The Council appointed specialist consultants Allen Pyke Associates in 2006 to carry out a, "Review of Land Subject to Protective MOL and OOLTI Designation" within the Borough. The Stag site Sports Fields at that time were not on the Council's schedule of such designated sites. Following the review and with the knowledge that the owners of the Stag site were minded to close-down and market the brewery site for sale, the Council decided to include the Stag Sports Fields as designated OOLTI land via their Development Allocations process. • The Adopted Development Brief for the site very clearly states that the OOLTI land is to be protected and enhanced. It also states in Open Space Clause 2.43 that, - " Consideration has been given to whether there would be any benefits from the relocation of this space and the Council's conclusion (supported by the public) is that it must be retained in this location, and made more accessible for public use'. Given the Council's endorsement to the status of the Adopted Development Brief in the modifications, following the Hearing, so the proposed wording on this bullet point remains confusing and contradictory to adopted policy and guidance. • The Council's own survey "All in One" which sought the local community's views on the Mortlake area put the existing open space twice as high as the next closest benefit that Mortlake surveyed residents valued the most. The community's views in this survey are reflected in the Council's strategy in the SPG 	
--	--	--	---	--

			<p>for the Stag site.</p> <ul style="list-style-type: none"> • A resident led Local Green Space application for the sports fields remains supported by the community and we await a positive outcome to that application. This reflects the community's strong commitment to retain this very important open space in its current existing location and continue to provide the cumulative benefits to the local area. • The modification wording states that any re-provisioning / re-distribution requires it to be "equivalent or improved in terms of quantum, quality, and openness." - This could potentially lead to erosion of OOLTI quality by fragmentation of quantum yet still equivalent in quantum. • Clause 2.44 of the Adopted Development Brief makes provision for a 'new' green link between Mortlake Green and the River Thames. It is quite clear this is a 'new' open space provision and not to be confused with the OOLTI land. The proposed modification wording could open the opportunity for development of the Stag site to 'blur the edges' in terms of quantum or re-provision. This is a genuine danger from what we have seen to date in the proposed plans shared with us by the developer's who are close to submitting a planning application for the site. • Besides the physical use of open space for recreation and/or sports it is acknowledged by OOLTI designation that such open space is contributory to the local character and hence the terminology of 'Townscape Importance' is part of its designation - re-providing or repositioning equivalent quantum of space elsewhere on the site would both lead to a major change in character to this south west section of the Stag site and remove the attributes which this important open green space provides as clearly recognised by the designation. • At present the OOLTI land is enjoyed in its present location by the local community and particularly by the residents who live 	
--	--	--	--	--

			<p>immediately alongside the sports fields. The OOLTI land designation recognises the visual amenity provided to the community and residents. Any re-provisioning elsewhere would immediately remove that amenity and value particularly to the local residents adjoining or enjoying views and aspect to this, "important part of the multi-functional network of Green Infrastructure" - see 5.3.1 of LP14. The borough's policy includes the 'Protection of Local character' and that designated open land will continue to be protected for its visual amenity.</p> <ul style="list-style-type: none"> • The concept of re-provisioning implies the opportunity for development on the sports fields. The whole community and local residents are completely opposed to such a concept. It would seem completely contrary to the principles of sustainability to rip up perfectly good open space and sports fields and such a valuable existing local amenity and re-provide this elsewhere on the site. • Clause 5.3.6 of LP14 in the Publication version now opens the possibility of "re-distribution" of OOLTI land and that it may be acceptable in certain circumstances where " a comprehensive approach to redevelopment can be taken, such as on major schemes or re-generation proposals, or for community and social infrastructure including educational uses". This we strongly argue is contradictory to the OOLTI status given to any such designated open space. It ignores the land's contribution to townscape, its contribution to the character of an area, its existing visual amenity to local community and residents, and immediate or longer views into and out of the site, including from surrounding properties. - see clause 5.3.4 of LP14. • At the Hearing the Inspector requested the Council to make it clear if the SPG for the Stag site would still be the overarching policy document to guide redevelopment of the site. The Council have clearly endorsed the adopted SPG for the Stag 	
--	--	--	---	--

			<p>site in the modifications. The re-provisioning bullet point (and 5.3.6 of LP14) are thus both in direct conflict with that Adopted Planning Brief and the concept of re-distribution or re-provision should be removed from the modifications because if retained in any way would be indirect conflict with the wording in the SPG and consultations with the public which contributed to the SPG wording/content.</p> <p>For these reasons we are very strongly opposed to this particular proposed modification which we maintain is unsound.</p>	
6	Greater London Authority on behalf of Mayor of London	MM1 Neighbourhood Planning, MM3 Housing, MM4 Building Heights, MM5 Amenity, MM6 Environmental Matters, MM10 Climate change, MM16 Health and Well-being, MM20 Industrial Land, MM21 Parking, MM23 Site Allocations	<p>Thank you for consulting the Mayor of London on the proposed Main Modifications to Richmond's draft Local Plan following the Examination Hearing sessions. As you are aware, all development plan documents must be in general conformity with the London Plan under section 24 (1)(b) of the Planning and Compulsory Purchase Act 2004. The Mayor provided comments on the Submission version of the draft Richmond Plan on 22 February 2017 (reference: LDF27LDD08/BS) and agreed a Statement of Common Ground with the London Borough of Richmond upon Thames on 7 September 2017.</p> <p>The Mayor has carefully considered the proposed main modifications and is of the opinion that they are not in general conformity with the London Plan, specifically proposed Main Modification MM21 does not address the Mayor's concerns regarding the proposed car parking standards.</p> <p>The Mayor has afforded me delegated authority to make more detailed comments on his behalf as set out below. Representations from Transport for London (TfL), which I endorse, are included within this response.</p> <p>General comment</p> <p>You will be aware that the Mayor published his draft London Plan for consultation on 1 December 2017. It is anticipated the</p>	<p>The Council's position remains as set out at Examination, considered justified by robust evidence and in general conformity with the London Plan.</p> <p>See responses to comment 3 above.</p> <p>See response to comment 3 on the draft London Plan. MM3</p>

			<p>Examination in Public of the new London Plan will take place in the Autumn 2018 with publication in Autumn 2019. Once published, the new London Plan will form part of Richmond's Development Plan and contain, where relevant, the most up-to-date policies. The Richmond Local Plan is required to be in general conformity with the current London Plan, however its policies will need to be considered alongside the draft London Plan. The draft London Plan is a material consideration in planning decisions, and gains weight as it moves towards publication. In light of the above, the Mayor would expect Richmond to consider an early review of its Local Plan to take into account its increased housing target and other matters.</p> <p>Detailed comments on the proposed main modifications to the Richmond Local Plan are set out in the table below.</p> <p>Responses to proposed main modifications</p> <table border="1" data-bbox="741 794 1581 1390"> <thead> <tr> <th data-bbox="741 794 965 916">Policy Section or heading</th> <th data-bbox="965 794 1160 916">Page/ Paragraph</th> <th data-bbox="1160 794 1581 916">Mayor's and TfL's response</th> </tr> </thead> <tbody> <tr> <td colspan="2" data-bbox="741 916 1160 986">MM1 Neighbourhood Planning</td> <td data-bbox="1160 916 1581 986"></td> </tr> <tr> <td data-bbox="741 986 965 1091">Strategic context</td> <td data-bbox="965 986 1160 1091">p10-11</td> <td data-bbox="1160 986 1581 1091">Welcome the reference to regional planning policy documents.</td> </tr> <tr> <td colspan="2" data-bbox="741 1091 1160 1155">MM3 Housing</td> <td data-bbox="1160 1091 1581 1155"></td> </tr> <tr> <td data-bbox="741 1155 965 1390">New Housing</td> <td data-bbox="965 1155 1160 1390">Para 9.1.1</td> <td data-bbox="1160 1155 1581 1390">Welcome the commitment, as necessary, to undertaking a review of the Local Plan in order to address housing delivery – see above paragraph regarding the new London Plan timetable.</td> </tr> </tbody> </table>	Policy Section or heading	Page/ Paragraph	Mayor's and TfL's response	MM1 Neighbourhood Planning			Strategic context	p10-11	Welcome the reference to regional planning policy documents.	MM3 Housing			New Housing	Para 9.1.1	Welcome the commitment, as necessary, to undertaking a review of the Local Plan in order to address housing delivery – see above paragraph regarding the new London Plan timetable.	<p>includes new paragraph 9.1.1 and MM22 recognise that circumstances and external factors will change during the Plan period.</p> <p>Support noted.</p> <p>Support noted.</p>
Policy Section or heading	Page/ Paragraph	Mayor's and TfL's response																	
MM1 Neighbourhood Planning																			
Strategic context	p10-11	Welcome the reference to regional planning policy documents.																	
MM3 Housing																			
New Housing	Para 9.1.1	Welcome the commitment, as necessary, to undertaking a review of the Local Plan in order to address housing delivery – see above paragraph regarding the new London Plan timetable.																	

			Housing Mix and Standards	p119 LP35 Para 9.2.2	Welcome the additional wording. This approach more closely aligns with draft new London Plan policy H12.	Support noted.
			Housing Mix and Standards	LP35	Support the deletion of restrictive private outdoor space requirements for housing. This will enable more flexibility in the design of new housing. Object to the deletion of the requirement for a minimum of 5sqm of private outdoor space per flat. The Mayor's Housing SPG and draft new London Plan policy D4 require a minimum of 5sqm of private outdoor space per dwelling.	Noted. The Council's position remains as set out at Examination, that standards are needed to secure good standard of amenity for all existing and future occupants and do not restrict flexibility as shortcomings can be justified, The Council intends to update the Residential Development Standards SPD
			Housing	LP36 Para 9.3.2	Support the clarification provided by the additional wording.	Support noted.
			MM4 Building Heights			
			Building heights	p31 Policy LP2	Support the deletion of the policy to resist taller buildings, and instead refer to design quality and standards with regards to taller buildings.	Support noted
			MM5 Amenity			
			Amenity and Living conditions	p41 Policy LP8	Support the deletion of the minimum distance requirement regarding main facing windows of habitable rooms. The Mayor agrees that this will	Noted. The Council's position remains as set out at Examination, that references to minimum distances are a reasonable starting point in the

					provide additional flexibility with regards to housing design and delivery.	<p>borough context, to provide clear guidance for developers and existing occupants, while recognising an assessment will be made on a case by case basis.</p> <p>Noted.</p> <p>See comment above regarding LP8.</p> <p>Support noted.</p> <p>Support noted.</p>
			Amenity and Living conditions	p41 Policy LP8	Support the proposed amendment to the wording to provide additional flexibility with regards to housing delivery. Policy 3.5 of the published London Plan and policy D4 of the draft new London Plan provide standards to require the delivery of high quality housing.	
			Amenity and Living conditions	p42 Para 4.8.8	Support the flexibility included in the supporting text, especially so that numerical guidelines are applied on a case by case basis.	
			MM6 Environmental Matters			
			Local Environmental Impacts, Pollution & Land Contamination	p44 Policy LP10	Support the amended wording to bring the policy in line with published London Plan policy 7.14 and draft new London Plan policy SI1.	
			Local Environmental Impacts, Pollution & Land Contamination	p45 Para 4.10.5	Support the additional text that requires mitigation to address air quality concerns.	
			MM10 Climate change			

			Flood Risk and Sustainable drainage	p73 Policy LP21	Support the inclusion of bedrooms in basements and self-contained basements/bedrooms as not permitted in 'more vulnerable and 'highly vulnerable' areas, respectively.	Support noted. Objection noted. This supports the Council's position as set out at Examination. See response to comment 3 on the draft London Plan. The Government has indicated there will be reference to this in the NPPF in future (Press release - Strengthened planning rules to protect music venues and their neighbours, 18 January 2018. Consider reference to the Agent of Change principles could be appropriate.
			MM16 Health and Well-being			
			Health and Well-being	P108 Policy LP30 Paras 8.3.13/14/15	Object to this main modification that would make it more difficult to refuse proposals for new fast food takeaways (A5 uses) located within 400m of a school. This Main Modification does not align with Policy E9 of the draft new London Plan.	
			MM20 Industrial Land			
			Industrial Land and Businesses Parks	p137 Policy LP42	The wording should be amended to clarify that the introduction of residential use should not adversely impact on proposed uses on the development site, nor existing uses in the vicinity. In this regard, the supporting text should refer to the Agent of Change principles in line with draft new London Plan policies E5E and D12 and the Government's announcement that the NPPF will include detailed reference to the Agent	

					<p>of Change principles.</p> <p>Amend wording to: 2b) Mixed use including other employment generating or community uses, <u>and residential providing it does not adversely impact on the other uses proposed as part of the development as well as existing developments, and maximises the amount of affordable housing delivered as part of the mix.</u></p> <p>Add a third bullet at the end of para 10.3.5 stating:</p> <ul style="list-style-type: none"> • <u>In line with Agents of Change principles residential development in the vicinity of industrial land should be designed to ensure that the industrial activities are not compromised or curtailed. Particular attention should be given to layouts, access, orientation, servicing, public realm, air quality, sound proofing and other design</u> 	<p>Noted. Consider this additional clarification may not be necessary.</p> <p>See comments above.</p>
--	--	--	--	--	--	---

					<u>mitigation in the residential development</u>	
			MM21 Parking			
					<p>Object to the proposed wording. To comply with the London Plan policy 6.13 (and draft New London Plan policy T6), the emphasis should be to promote reduced parking, or car-free development, where appropriate. The wording should be amended to this effect.</p> <p>The London Plan does not support a requirement for car parking provision in new development, and as such the proposed wording in MM21 should be clear that parking standards are set as maximums. To be in conformity with the London Plan, the wording should be changed to: In general it is expected that in PTAL areas of <u>0-1</u> the standards should be met.</p>	See response to comment 3.
			MM23 Site Allocations			
			Site Allocations	SA8 St Mary's University,	These changes are in line with those previously agreed by the Mayor of London.	Noted.

				Strawberry Hill		See response to comment 3
				SA24 Stag Brewery	<p>TfL will continue to engage with the Council and the developer to determine the appropriate level of mitigation required. In terms of the bus stopping and routing arrangements, the proposed wording should be amended as follows:</p> <p><u>The opportunity for a bus route to terminate/turn around at to relocate the bus stopping / turning facility from Avondale Road Bus station to</u> this site should be investigated as part of the <u>comprehensive redevelopment.</u></p> <p>The viability of the options to provide this will be considered by TfL.</p>	
7	Highways England	General	<p>Thank you for your email dated 22nd December 2017, advising Highways England of the above consultation.</p> <p>Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship</p>			Noted.

			<p>of its long-term operation and integrity.</p> <p>Highways England will be concerned with proposals that have the potential to impact on the safe and efficient operation of the Strategic Road Network (SRN) and in the case of the London Borough of Richmond Local Plan this is the M3, M4, A316 and A3. We previously responded in January 2017 on the Local Plan, stating that we were pleased to see specific reference to the SRN and that if any development does arise which impacts the SRN then it will be mitigated.</p> <p>Having examined the main modifications, we do not offer any further comments.</p>	
8	Helen Bantock	MM16 Health and Well Being	<p>I am concerned that the local plan is not standing to its original directive that fast food outlets would not be granted permission to trade within 400m of schools. Although this has been challenged by Kentucky Fried Chicken on the grounds that it would mean no opportunity at all for fast food outlets where catchment areas are close together I wonder if there is a middle ground here, and perhaps a revising to a 200m embargo instead of just a pick and choose. Another idea would be to only grant them permission to trade after 6pm, away from school hours.</p> <p>I am particularly concerned with regards to the Mortlake Brewery development where the school is being shoehorned into a very small area where we are also promised shops and restaurants. If these become fast food outlets right on the doorstep of the school then pupils will be going and froing to buy fast food, at a time where we are all valuing proper food for growing children. There is also an environmental impact on refuse so close to the river. The river at this point has a lot of plastic and takeout debris in its tidal flotsam that is washed up on the slipway by Bull's Alley and The Ship – this is with no fast food outlets close by yet!</p> <p>In the case of the brewery development I am sure the idea of the</p>	<p>Noted. This supports the Council's position as set out at Examination. 400 metres is generally regarded as easy walking distance and is used elsewhere in the Plan. It would be unreasonable to restrict lunchtime trade.</p>

			<p>developer is to create an aspirational residential area, the fast food outlets would therefore only be there to serve the school pupils.</p>	
9	Surrey County Council	MM12 Waste Management, MM20 Industrial Land	<p>Thank you for consulting Surrey County Council on the proposed main modifications to London Borough of Richmond's Local Plan.</p> <p>Our comments relate to waste management and industrial land.</p> <p>MM2 Waste Management: new paragraph after paragraph 6.5.6 We support the proposed modification as it clarifies that the status of existing waste management sites may change over time and additional sites receive permission. It helpfully also points to monitoring information available in LB Richmond's AMR.</p> <p>MM20 Industrial Land: Part B criterion c We support the proposed modification but would suggest the following addition in order to strengthen protection of waste management facilities: "proposals for non-industrial uses will be resisted where the introduction of such uses would have an adverse impact on the continued operation of the existing services impact unacceptably on industrial activities, including existing safeguarded waste management sites."</p>	<p>Support noted</p> <p>Noted. Consider the amended wording may be appropriate.</p>
10	Max Millington	MM23 Site Allocations, MM8 Open Space	<p>I write in relation to on-going consultation on the Proposed Main Modifications to the Local Plan and on the same basis communicated to you previously. Our comments relate primarily to the Site Allocations SA 24 Stag Brewery.</p> <p><u>1. Air Quality - Pg 186</u> We strongly support, in principle, the addition of this new bullet point related to mitigation measures in terms of air quality. However, we are concerned that this specific reference could undermine the wider body of applicable legislation and guidance,</p>	<p>Support for a number of Main Modifications noted.</p> <p>The Council's position remains, as the Council's proposed changes following the hearings are reflected in the Main Modifications.</p>

		<p>as well as the requirement for a detailed environmental impact assessment and habitats regulations appropriate assessment. It should also acknowledge the proposed health care centre. Accordingly, this should be re-phrased:</p> <p>“The site is very close to borders an Air Quality Focus Area. Therefore, in addition to the satisfaction of criteria and the taking of any measures that would ordinarily be required as a pre-requisite to or condition of development in accordance with applicable legislation and guidance (including a detailed environmental impact assessment and habitats regulations appropriate assessment), particularly strict mitigation measures will be required, both to mitigate (or eliminate) any effect on current receptors and highways and on future receptors within the proposed development, particularly for sensitive receptors, such as pupils at the secondary school or travelling from the development to local schools and any elderly people or persons suffering ill-health who might be expected to reside at or attend any proposed retirement village and/or health care centre.’</p> <p><u>2. Transportation /Highways - Pg 186</u> We strongly support the proposed modifications to the wording of this penultimate bullet point.</p> <p><u>3. Adopted Development Brief - Pg 186</u> We support the proposed modification which makes it clear that the Planning Brief for the Stag Brewery site, adopted July 2011, retains its status in full and that any development scheme has to have regard to this adopted SPD. That 'regard' should, therefore, be 'due regard', recognizing its agreed status. Accordingly, we request this be amended as follows:</p> <p><i><u>'Any proposed development should have due regard to the adopted brief as the adopted supplementary planning document for the site.'</u></i></p>	
--	--	---	--

			<p>4. <u>Reference to requirement for a 6-form entry secondary school – Pg 186 (and various others identified in original representations)</u> The rationale for a 6-form entry secondary school, in lieu of a primary school, and the suitability of the site (relative to alternative sites) to house such a school, have <u>still</u> not yet been satisfactorily made out. Still less so in light of the new proposal for the primary school, in the last draft earmarked for SA28 (Barnes Hospital), being reallocated for SEN instead. The dearth of primary education facilities in the area, which necessitated the 2-form entry primary school on the SA24 site and which will become all the more acute in light of projected demographical changes locally and on the development site, has simply not been properly addressed. Accordingly all previous comments in relation to the 6-form entry secondary school are re-stated.</p> <p>5. <u>Archaeology - Pg 186</u> We strongly support the revised wording including now the reference to the site being within an Archaeological Priority Area.</p> <p>6. <u>OOLTI status and criteria to 're-provision' –p.57</u> The plan allows OOLTI-designated land to be developed upon in limited circumstances. A pre-condition to any such development being permitted is that it must be redistributed on the development site. The re- distributed land must meet certain criteria relative to the land being re-distributed (or provisioned) – namely as to quantity, quality and openness (the Redistribution Criteria). As discussed during the September / October Local Plan examination and agreed with the Council's representatives at our meeting in November 2017, whether or not these criteria have been satisfied in relation to a proposed development needs to be assessed <u>disregarding</u> any land</p>	
--	--	--	--	--

		<p>provided as part of the regular requirements laid down by the National Planning Policy Framework and other relevant legislation (including the London Plan) for the provision of suitable amenity space and the protection of green and open spaces – otherwise there would be no benefit to the designation. Accordingly, please state (at the end of each reference to the OOLTI re-provisioning criteria): <i>'In assessing whether or not these pre-conditions to re-provision have been satisfied, any green, open or amenity space (or similar) otherwise provided pursuant to other planning requirements will be disregarded.'</i></p> <p><u>7. Open space to south west of the Stag Site: LGS & OOLTI - Pg 186</u></p> <p>We continue to await an outcome from the Local Green Space application submitted in February 2017 and in relation to which further representations were heard during the September / October 2017 examination hearing. Detailed reasons supporting the conclusion reached should be provided please. Assuming the application has been accepted, this paragraph should additionally state that any 're-provision' shall be expressed to be <i>'subject to the protections afforded by the NPPF and in particular the Local Green Space designation'</i>. These protections are expressed elsewhere in the plan to be akin to those afforded to Green Belt land so do not need to be detailed again here.</p> <p>Notwithstanding the comments in para. 6 above, we otherwise strongly support the proposed modifications that conform the grounds on which re-provisioning can be achieved in line with the OOLTI designation to the requirements of new paragraph 5.3.6 of LP14 on open spaces. Critical to this support is the requirement that <u>all three</u> criteria of openness, quality and quantity must be achieved. This is not least because, besides the physical use of open space for recreation and/or sports, it is acknowledged by OOLTI designation that such open space is</p>	
--	--	--	--

			<p>contributory to the local character and hence the terminology of 'Townscape Importance' is part of its designation.</p> <p><u>8. Open land / Local Green Space – p.56 para 5.2.8</u> Delete (or clarify) addition that '<i>New areas of Local Green Space designation can only be identified when a plan is being prepared or reviewed</i>'. This is inconsistent with the NPPF, which (i) does not require this and (ii) disregards the Neighbourhood Plan route. An application may be made and assessed at any time; it is simply the formal designation which the NPPF (or related guidance) indicates can only be ratified through a plan process.</p> <p>Amend Appendix 7 for consistency with this.</p>			
11	Environment Agency	General	Thank you for consulting the Environment Agency on the above. We have reviewed the proposed Main Modifications and have no further comments.			Noted.
12	Sport England	MM14 Community Facilities, MM17 Open Space and Recreation, MM23 Site Allocations	<p>Thank you for consulting Sport England on the main modifications to the Local Plan.</p> <p>Sport England supports the proposed amendments MM14 and MM17.</p> <p>Sport England further supports the modifications to the following site allocations, following our representations on the plan including, St. Mary's University, Strawberry Hill, Kneller Hall and Stag Brewery. With regard to Stag Brewery (pg. 186 - SA24) Sport England welcomes the reference to the NPPF and Sport England Policy.</p>			<p>Support noted.</p> <p>Support noted.</p>
13	Tim Catchpole on behalf of Mortlake with East Sheen Society	MM6 Environmental Matters, MM16 Health and Well Being, MM17 Open Space and Recreation,	<p>MESS comments on Publication Local Plan, Feb 2017 and Public Hearing, Sept-Oct 2017</p> <p>3. Spatial Strategy</p>	<p>Proposed Modifications, Dec 2017</p>	<p>MESS comments on Proposed Modifications, Jan 2018</p>	Support for a number of Main Modifications noted. The Council's position remains, as the Council's proposed changes following the hearings are reflected in the Main Modifications or Additional

		MM23 Site Allocations	3.1.6 We noted that “there is a presumption against the loss of, or building on, greenfield sites in this borough.”	Modification not expected.	It should be noted that the SA24 (Mortlake Brewery) text is in conflict with this statement (see below).	Modifications.
			3.1.7 We noted that “the Spatial Strategy and supporting evidence demonstrate that the Council can meet its strategic housing target without using greenfield sites.” This is re-iterated more or less in para 3.1.13.	Modification not expected.	Will this statement stand up to the substantial increase in housing targets shown in the recently published New London Plan?	
			3.1.30 We noted that “higher density development will be sought in more sustainable locations such as the borough’s centres and areas served by better public transport.”	Modification not expected.	It should be noted that the proposed high density on SA24 is in an area not served well by bus transport, albeit within 800m of a rail station.	
			4. Local Character and Design <i>LP5 Views and</i>			

			Vistas			The Council's Additional Modification EH/LP5/3 refers to all decision-making authorities.
			4.5.3 We noted that “the protection and enhancement of the strategic view from King Henry VIII’s Mound to St Paul’s will be achieved by consultation between boroughs.” We urged the addition of “GLA and LLDC.”	No modification given.	We still urge the addition of “GLA and LLDC” as this strategic view has now been marred by a tall building in LLDC territory. It is crucial the Borough of Richmond keeps an eye on all future development proposals in this particular territory.	
			LP10 Air Quality			
			We noted reference here to mitigation measures “including the type of equipment installed, thermal insulation and ducting abatement technology” but no mention of trees and vegetation.	We note that “strict mitigation will be required for any developments proposed within or adjacent to Air Quality Focus Areas as designated by GLA.”	This is fine (and we have an AQFA in Mortlake) but “strict mitigation” needs to be amplified and we urge that mention is made of trees and vegetation which absorb pollutants.	
			LP11 Subterranean developments and basements			
			The pity is that basement	No modification given.	The pity remains.	

			<p>extensions are usually vanity projects providing space for private swimming pools, gymnasia and cinemas, much of it unsustainable and at huge cost to neighbours who suffer during long construction periods.</p>			
			<p>5. Green Infrastructure LP13 Green Belt, MOL and Local Green Space LP14 OOLTI</p>			
			<p>We noted that such areas of open space will be protected.</p>	<p>We note that “new areas of such designation can only be identified when a plan is being prepared or reviewed.”</p>	<p>So be it.</p>	
			<p>7. Town Centres LP26 Retail Frontages</p>			
			<p>We noted that “the Council will not permit development of fast food</p>	<p>We note the modification, vis. “the Council will manage new fast</p>	<p>Does “manage” mean that the Council will grant planning</p>	<p>Noted. MM16 includes guidance on the factors the Council will consider in paragraph 8.3.14.</p>

			<p>takeaways located within 400m of the boundaries of a primary or secondary school. This is in order to restrict the availability of unhealthy foods to school-age children.” We note that this gets repeated in LP30 Health and Well-being.</p>	<p>food takeaways... This is in order to support promotion of healthy foods...”</p>	<p>permission subject to the condition that healthy foods are served? How easily enforceable is such a condition? And how will all existing fast food outlets be “managed”?</p>	<p>Comment noted</p>
			<p>LP31 Public Open Space, Play Space, Sport and Recreation</p>			
			<p>We noted that there was no mention of playing fields and associated sports facilities in this policy.</p>	<p>This has now been mentioned.</p>	<p>Accepted.</p>	
			<p>9. Housing LP34 New</p>			

			Housing			
			We noted that the approximate number of units indicated for East Sheen, Mortlake/Barnes Common and Barnes is 400-500 from now till 2025 and we were unsure of whether this included provision on the Stag Brewery site (we assumed not).	We note that “the Council will, as necessary, undertake a review of the Local Plan in the light of the content of the new adopted London Plan.”	The new draft London Plan shows a substantial increase in the housing target for the Borough and we wait to see how much of this will be allocated to East Sheen, Mortlake/Barnes Common and Barnes.	
			11. Transport LP45 Parking Standards and Servicing			
			We noted that this policy requires new development to provide parking for cars, bicycles and... electric vehicle charging points, but we were concerned about the lack of any policy regarding electric vehicles in the existing development	This is not mentioned in the Modifications.	There still needs to be a policy about the location of charging points for electric vehicles in the existing, as distinct from the new, development context, including a strict policy against the loss of front gardens for this purpose.	

			context, in particular the loss of front gardens to accommodate electric vehicle charging from the house.			Noted. The Council's position remains as set out at Examination.
			12. SA24 Stag Brewery, Mortlake			
			We noted "the retention and/or re-provision and upgrading of the playing fields" and were much concerned about the late insertion of "and/or re-provision".	No modification.	We are opposed to the late insertion of "re-provision" for all the reasons given by the Mortlake Brewery Community Group. We have also heard that the Mayor of London is opposed to re-provision in principle. We urge therefore that it be deleted.	
			We noted that the Council's development brief had been	This has been rectified.	Good!	

			mentioned but with no indication of whether it should be followed.			
			We noted there was no mention of the site being partly within an Archaeological Priority Area.	This has been rectified.	Good!	
			We noted there was no mention of the site being near an Air Quality Focus Area.	This has been rectified and mention is made of strict mitigation measures being required.	Good, but it might be helpful to cross refer to LP10 for a definition of strict mitigation measures.	
			We noted there was no mention of improvements to sustainable modes of travel being secured.	This has been rectified.	Good, but there needs to be some reference to such improvements occurring at Mortlake Station and the Sheen Lane level crossing as well as around the site.	
			SA28 Barnes Hospital			
			We showed concern about part of the site being developed for a 2-form entry primary school as access is	This has been altered to a Special Education Needs school which would contain	This is better but the access requirements for it, as well as for other uses on the site including housing,	

			poor.	significantly fewer pupils.	needs to be given a thorough assessment.	
			Other Sites not included: Mortlake Station			
			We noted that Mortlake Station had been included in a previous version of the Local Plan but was now excluded.	No mention.	We feel the time has come for this site to be reinstated because it has an integral relationship with the Mortlake Brewery redevelopment. The developer should be helping to fund necessary improvements for sustainable modes of transport here and at the Sheen Lane level crossing rather than unsustainable modes of transport at the proposed realignment of Lower Richmond Road at the	

					Chalkers Corner junction.	
14	Historic England	General	<p>Thank you for consulting Historic England on the schedule of proposed Main Modifications following the examination hearings on the local plan.</p> <p>We have welcomed the opportunity to work with the Council on the local plan, and are very pleased to see that the proposed modifications agreed between us are reflected in the schedule. There are just two points we would like to raise at this stage:</p> <ul style="list-style-type: none"> • The review of Richmond’s Archaeological Priority Areas is underway, although the completion date is not yet clear. In para 4.7.3 we recommend that you amend the wording to: <i>‘The borough’s APAs are being reviewed by GLAAS as part of ...’</i>. The new draft London Plan gives particular prominence to the review of APAs and therefore GLAAS will wish to expedite this. Should you need more information, please contact Diane Abrams: diane.abrams@HistoricEngland.org.uk • We agreed that references to the APAs would not be included in the site allocations because the amended areas were coming forward. However, it remains important that applicants can find information easily as to the extent of the existing APAs and potential changes to them. This information will be placed on our website in the next few weeks. The final sentence in para 4.7.3 states the Council will provide a link, and we recommend that you include the following live link: https://historicengland.org.uk/services-skills/our-planning-services/greater-london-archaeology-advisory-service/greater-london-archaeological-priority-areas/ 			<p>Noted.</p> <p>Consider this minor update can be incorporated.</p> <p>Consider this updated link can be incorporated.</p>
15	Barton Willmore on behalf of Quantum Group	MM7 Green Infrastructure	<p>We write on behalf of our client, Quantum Group, in response to the current consultation on the Proposed Main Modifications to the Local Plan, following its Examination in Public during autumn 2018.</p>			

		<p>We provide comments on the modifications in relation to the planning policies that affect the proposed development at the former Imperial College Private Ground, Udney Park Road, Teddington. A planning application was submitted to the Council on 16 February 2018 for the following: <i>“Erection of a new extra-care community, with new public open space and improved sports facilities, comprising: 107 extra-care apartments (Class C2 use), visitor suites, and associated car parking; 12 GP surgery (Class D1 use) and associated car parking; new public open space including a public park, and a community orchard; improved sports facilities (Class D2 use) comprising a 3G pitch, turf pitch, MUGA, playground, pavilion and community space, and associated parking (68 spaces); paddock for horses; and a new pedestrian crossing at Cromwell Road; and all other associated works.”</i></p> <p>Our proposed development, together with the representations submitted to the Local Plan consultations (enclosed), should be reviewed in the context of the additional specific comments set out below.</p> <p>Green Infrastructure – P.56, Paragraph 5.2.10 We note that the Inspector proposes to delete the last three bullet points of paragraph 5.2.10 of the draft Local Plan. Quantum Group supports this modification, as it aligns with representations prepared by Barton Willmore (Landscape and Visual Statement, February 2017 (enclosed)) and submitted on behalf of us to the previous Local Plan Consultation stage. The Statement concluded: <i>“As demonstrated, the existing character of the Site can be adequately and reasonably protected by both the existing adopted Policy DM OS 3 and the emerging Policy LP 14, with regard to Other Open Land of Townscape Importance, and that additional protection of a Local Green Space designation is neither appropriate nor necessary.</i></p>	<p>This application is not validated awaiting further required information.</p> <p>The Council's position remains as set out at Examination, including LBR-LP-016 Appendix 1 to the Council's Statement Hearing 5– Evidence to support the designation of Udney Park Playing Fields as LGS designation. The criteria have been refined locally and considered consistent with the NPPF.</p>
--	--	--	---

			<p><i>In this context, on consideration of the proposals for the Site, as promoted by the Quantum Group and the Teddington Sports Ground CIC...the proposals offer real enhancements to the Other Open Land of Townscape Importance, in accordance with the policy objectives set out in both the existing adopted Policy DM OS3 and the emerging Policy LP 14. ”</i></p> <p>We therefore recognise the proposed modifications to this policy, for the reasons set out above and the comments provided by the Inspector, to ensure clarity and effectiveness consistent with national policy. As you will be aware from the Barton Willmore evidence and appearances at the Local Plan Review Examination, the Council’s proposed changes do not address the major and fundamental concerns raised about the soundness of policies in respect of open space and Local Green Space and the suitability of the application of Local Green Space to any site in the Borough and specifically the former Imperial College Private Ground.</p> <p>We are off the view that there was no evidential basis for the inclusion of the policy tests in relation to local green space designations and therefore we agree that the previously drafted text was unsound and may have unduly influenced the decision to propose a Local Green Space designation at the former Imperial College Private Ground.</p> <p><i>[Enclosed – as previously published REP-228-01 Barton Willmore on behalf of Quantum Group – Written Statement – Hearing 5 – Character and Design, Green Infrastructure, Climate Change (8 September 2017)]</i></p>	
16	Teddington Community Sports Ground CIC	MM7 Green Infrastructure	I write on behalf of the Teddington Community Sports Ground CIC to support the Inspector’s proposal to delete the last three bullet points to paragraph 5.2.10.	See responses to comment 15 above.

			<p>We are a local community group with an opportunity to unlock enormous community benefits at the Former Imperial College London Private Ground, on Udney Park Road, an underutilised and private ground. We have recently submitted a joint planning application with the owners of the site for enhanced sporting facilities, a new public park and an extra care community.</p> <p>We agree that the deletion of these points provides more clarity and effectiveness consistent with national policy. However, we consider, as we heard at the hearing sessions, the Council has not provided a sound evidence base or rationale for the inclusion of any designations of Local Green Space. As we noted from the Barton Willmore evidence, the former Imperial College London Private Ground should be deleted as Local Green Space, even if the Local Green Space policy remains.</p>	
17	Colliers on behalf of Greggs Plc	MM20 Industrial Land	<p>On behalf of our client, Greggs PLC, we are instructed to make representations in respect of the consultation on the Main Modifications to the emerging Local Plan.</p> <p>Greggs have made representations at each stage of the Local Plan process and contributed, with the support of Landmark Chambers, to the Examination in Public. These representations build upon those submissions and comment specifically on the Main Modifications proposed. They should nonetheless be read in conjunction with, and as an extension of, these previous contributions.</p> <p>These representations relate specifically to the aforementioned property at Gould Road and have regard to the extent to which the proposed Main Modifications would apply in considerations of its future use. In this respect, these representations relate to section MM 20 of the Main Modifications document and, specifically, the amendments that are proposed to Policy LP42.</p> <p>Greggs is of the opinion that they have demonstrated that the</p>	<p>Position remains as set out in the examination.</p> <p>Based on the substantial evidence and research reports set out in evidence at the examination, the Council upholds its right to allocate the West Twickenham Cluster as a Locally Important Industrial Land and Business Park.</p> <p>Note that the draft London Plan proposes a no net loss approach to industrial land and this Borough is categorised as one which must Retain capacity.</p> <p>We have demonstrated that the Borough has a critical shortage</p>

		<p>Publication Local Plan does not meet the soundness criteria set out by the <i>National Planning Policy Framework</i> (NPPF).</p> <p>Greggs, with the assistance of Reuben Taylor QC, have sought to stress that plans must be evidence-based and that the Borough has put forward no evidence to support the approach taken in the draft plan. Indeed, the Council’s own evidence base, published in September 2017, conflicts with the direction of travel.</p> <p>Greggs do not feel that the Publication Local Plan is positively prepared, justified, effective or consistent with national policy.</p> <p>Greggs consider that the proposed amendments to Policy LP42 are insufficient, and the concerns set out in previous representations have not been addressed. Greggs remain of the view that, in order for the Plan to be made sound, the Borough could undertake the following actions:</p> <ol style="list-style-type: none"> 1. Reallocate the Greggs site for a residential-led mixed use scheme; if, without prejudice, this is not achieved, then we would suggest the following: 2. Remove the “West Twickenham Cluster” from the list of areas identified as “locally important industrial land and business parks”. <p>Notwithstanding the above points, responses to each of the relevant proposed changes to Policy LP42 are set out below, for consideration. These responses are made on the Proposed Main Modifications without prejudice to the fact that Greggs consider that the site at Gould Road should be reallocated for a residential-led mixed use scheme.</p> <p>Whilst Greggs acknowledge that some employment use might be</p>	<p>of land for industrial, storage and distribution, and other related functions to support the local economy.</p>
--	--	---	--

			<p>achievable on the site as part of a mixed-use scheme, it strongly objects to the Borough's proposal to allocate the site as 'Locally Important Industrial Land'.</p> <p><i>Proposed Change to Policy LP42: Change wording in Part B criterion a to read:</i> <i>a) loss of industrial floorspace will be resisted unless <u>appropriate full, on-site</u> replacement employment space is provided;</i></p> <p>Greggs welcomes that Part B, criterion (a), of Policy LP42 has been amended to include greater flexibility in respect of the replacement floorspace required in schemes where there is a loss of industrial floorspace. However, this is not considered to provide sufficient flexibility to ensure the best outcomes can be achieved for the Borough.</p> <p>As set out in previous representations, the replacement of existing industrial floorspace on the Greggs site as part of a redevelopment scheme is unachievable. It is not feasible for the existing floorspace to be re-provided alongside the level of car parking that would be required for a scheme to be compliant with policy. Furthermore, if re-provided, it is noted that other forms of employment space may be more appropriate.</p> <p>The proposed approach remains too restrictive. This element should be revised further to include consideration of employment capacity, including through uses other than those which are industrial in nature, such as co-working and SME space.</p> <p>The wording should be amended to allow flexibility in for any replacement space which might be of a higher quality or with increased employment capacity, at the discretion of the Local Authority. This approach should also be followed at Policy LP40.</p>	
--	--	--	---	--

			<p>As demonstrated in previous representations, due to the site's constraints, an industrial redevelopment scheme on the Greggs site would provide both less floorspace and fewer jobs. This is not in the interest of Borough or local community.</p> <p>Greggs have previously prepared an indicative scheme for the residential-led redevelopment of the site which demonstrates how a residential-led redevelopment incorporating B1 uses would enable a similar number of jobs to be maintained on the site to those which are associated with the existing bakery by increasing the employment density of the space provided.</p> <p><i>Proposed Change: Change wording in Part B criterion c to read:</i> <i>c) proposals for non-industrial uses will be resisted where the introduction of such uses would have an adverse impact on the continued operation of the existing services <u>impact unacceptably on the surrounding area.</u></i></p> <p>The Borough is correct in seeking to ensure that industrial operators are not negatively impacted through the introduction of non-industrial uses. Proposals for locally important industrial land and business parks are required by meet each criterion of Policy LP42 Part B. An important consideration in any proposed development is the extent to which the proposal will impact prejudicially upon those which already function. Greggs therefore consider that the wording of criterion (c) is too narrow. Instead, the impact on all uses and the functioning of the area should be considered. The text should therefore be amended.</p> <p>Greggs have demonstrated the importance of issues associated with having non-industrial uses and industrial uses adjacent to one another. Greggs have received various complaints over time in respect of the negative impact from their industrial unit on the</p>	
--	--	--	--	--

		<p>amenity of nearby neighbours. This includes traffic conflicts, noise and smells amongst other considerations.</p> <p><i>Proposed Change: Amend text to read: 10.3.8 In the locally important industrial land and business parks loss of industrial space will be strongly resisted unless <u>appropriate full, on-site replacement provision is provided. Appropriateness will be determined with particular regard to site circumstances and the industrial/employment needs of the Borough.</u></i></p> <p>As made clear previously, there is a paramount need for the addition of greater flexibility, to enable the most appropriate responses to site-specific circumstances and ensure the best outcomes. Accordingly, Paragraph 10.3.8, which forms part of the supporting text for Policy LP42, whilst welcomed in terms of its direction, requires revision as set out above.</p> <p>Greggs are also of the view that Paragraph 10.3.8 should be amended further, with the final sentence (which reads “<i>proposals for non-industrial uses will be resisted unless the proposed uses are ancillary to the principal industrial use on the site</i>”) being deleted. This is because the requirement for any non-industrial uses to be ancillary to a principal industrial use is overly prescriptive and does not give any consideration to the employment capacity that can be generated by non-industrial uses.</p> <p><u>Summary</u> Greggs welcome the opportunity to continue in dialogue with the Borough in respect of the emerging Local Plan and, at this stage, the Proposed Modifications. It is nonetheless of the view that the Borough’s Publication Local Plan cannot be considered “sound” for the purposes of the <i>National Planning Policy Framework</i></p>	
--	--	--	--

			<p>(NPPF).</p> <p>Greggs is clear that the Main Modifications proposed by the Council do not provide the flexibility or positive approach to plan-making that is required by the NPPF and London Plan.</p> <p>For this reason, for the avoidance of doubt, Greggs strongly objects to the Borough’s proposed approach.</p> <p>Greggs objects to the proposal to allocate their property as ‘Locally Important Industrial Land’, for which there is no evidence.</p> <p>Greggs also object to the proposed wording of draft Policy LP42.</p> <p>For the reasons set out above and in previous submissions to the Local Plan, Greggs considers that the draft plan has not been positively prepared and is unsound.</p> <p>Greggs are of the view that the emerging Local Plan lacks soundness because it is not justified, effective or consistent with national policy. Greggs also consider that the draft plan is inconsistent with the London Plan.</p>	
18	Natural England	MM10 Climate Change, MM3 Housing	<p>I’m writing from Natural England concerning the Main Modifications to Richmond upon Thames Local Plan. The only minor comments we would like to make on the modifications are as follows:</p> <p>The addition after Paragraph 6.2.8 may benefit from a recognition of the role which green infrastructure can play in flood alleviation, and that natural flood management techniques should be integrated within the Flood Risk Assessment process in light of increased precipitation</p>	<p>Noted.</p> <p>Noted. Reference is made in other parts of the Plan including paragraphs 5.5.1 and 6.1.7.</p>

			<p>The addition to Paragraph 9.1.1 relating to the triggering of the a Local Plan review in light of the content of the new London Plan. We would like to emphasize that the elevated housing targets outlined within the draft new London Plan underscore the need for strong protective policies for biodiversity, and we would strongly encourage the council to continue strengthening biodiversity policy over the course of any subsequent review.</p> <p>We do not consider that the modifications made to the plan have negative implications in regards to soundness in relation to the plan's impact on biodiversity.</p>	Noted, matter for future review.
19	Indigo on behalf of Beechcroft Developments Ltd	MM23 Site Allocations	<p>On behalf of Beechcroft Developments Ltd, we submit representations to the consultation on the Inspector's proposed Main Modifications to the London Borough of Richmond upon Thames (LBRuT) Draft Local Plan. These representations address the proposed Main Modification to SA 17: St Michael's Convent.</p> <p>SA 17: St Michael's Convent The proposed Main Modification to SA 17 states that only the area lying to the north of the lawn and its delineating path should be designated as Other Site of Nature Importance (OSNI). However, the draft OSNI boundary still includes the walled garden area of the site, which was formerly used by the Sisters at the Convent as a flower and vegetable garden and has limited ecological value, therefore not warranting designation as OSNI.</p> <p>The Council's evidence base supporting the OSNI designation (habitat survey undertaken by Salix Ecology, dated September 2016: 'Habitat survey of proposed Sites of Importance for Nature Conservation in the London Borough of Richmond upon Thames' and the 2017 Addendum to this report (dated October 2017)) do not attribute any ecological value to the walled garden. The designation of the walled garden as OSNI is therefore unjustified as it is not based on a proportionate evidence base and conflicts</p>	<p>The Council's position remains as set out at Examination.</p> <p>The information and evidence, including additional evidence as requested from the Council's ecologist, which has been supported by an addendum from the expert consultant ecologist, were set out previously in LBR-LP-030 Council's Ecology Officer position on the proposed designation of St Michael's Convent as an OSNI (10 October 2017) and PS-065 St Michael's Convent (SA 17) 2017 Addendum (October 2017).</p> <p>The Sustainability Appraisal Addendum of the Proposed Main Modifications carried out a further SA of SA17 in light of MM23 to amend the OSNI area, and noted the amended</p>

		<p>with paragraph 182 of the NPPF.</p> <p>As demonstrated through our representations to previous versions of the draft Local Plan, there is a lack of evidence to support the designation of St Michael's Convent gardens as OOLTI and we have fundamental concerns regarding the introduction of this designation without the appropriate evidence.</p> <p>The draft Site Allocations DPD (2014), which has since been incorporated into the new Local Plan Review, sought to introduce the gardens to the OOLTI designation. In 2006 Allen Pyke & Associates, on behalf of the Council, carried out a review of open land designations in the Borough to assess whether they were appropriately designated. They then reviewed a further 100 other open areas. The consultants suggested that 35 areas be designated as OOLTI, and a further 65 should be put forward for consideration. St Michael's Convent was not identified in this comprehensive study which forms the basis of formal designations through the 2011 Development Management Development Plan Document. This is clear evidence that the site is not of sufficient value in planning terms to be designated OOLTI.</p> <p>Given the comprehensive nature of the work on the review, it was the DM DPD which should have introduced the OOLTI designation if this was justified. The Site Allocations DPD was not the appropriate document to amend the provisions of the DM DPD or the Local Plan proposals map.</p> <p>Supporting paragraph 5.3.4 of the Publication Local Plan states that OOLTI should be predominantly open or natural in character with associated criteria. The council has not undertaken any proper assessment of the site in the context of this description.</p> <p>The proposed OOLTI designation covers the majority of the</p>	<p>boundary is likely to cause harm and some protected acid grassland to become vulnerable.</p> <p>It should be noted that the acid grassland is a priority habitat as per the 'UK Post-2010 Biodiversity Framework' (July 2012).</p> <p>The wildlife corridors referred to may not be defined as an area, however all the open spaces in the immediate area are designated as OSNI's and therefore, by their proximate nature create a wildlife corridor.</p> <p>OSNIs do not necessarily have to be public open spaces and there are a number of other OSNI locations which are not open to the public, such as The Cassell Hospital and Hampton Court School.</p>
--	--	--	--

		<p>garden area to the rear of the convent. This area is part of the domestic amenities of the main building. It is very well screened on its boundary, to the point where it is very difficult to get any views into the site. This is not surprising given the domestic nature of the area. The boundary planting provides some general amenity and it is protected by virtue of its location within a conservation area. In this way, the value of the site to its surroundings will be maintained into the future. The site is relatively small and is not visible in general views from Ham Common and it fronts onto a cul-de-sac comprising 19 dwellings, built in the late 1960s on land similar to the proposed OOLTI land, once owned by the convent and the adjoining neighbour.</p> <p>The proposed OOLTI land does not therefore meet the criteria of the OOLTI designation due to its lack of contribution to local character.</p> <p>Furthermore, paragraph 5.3.4 of the Publication Local Plan states the following prior to the OOLTI assessment criteria: “note that the criteria are qualitative and not all need to be met”. This text undermines the value of the OOLTI policy, making it open-ended and preventing it from being rigorously applied in practice. The designation of the gardens as OOLTI is therefore not justified, nor consistent with the NPPF (paragraph 158), as it lacks the necessary evidence base.</p> <p>The Council provided an assessment of St Michael’s Convent against the OOLTI criteria (outlined at paragraph 5.3.4 of the Publication Version of the Local Plan) in Appendix 3 of the Council’s Local Plan Examination Written Statement for Hearing 4 (dated 8 September 2017).</p> <p>The Council’s assessment is outlined in the below table, alongside Indigo Planning’s commentary, which demonstrates that the site does not meet the OOTLI criteria.</p>	
--	--	---	--

			OOLTI criteria	Council's response	Indigo response	
			<p>Contribution to the local character and/or street scene, by virtue of its size, position and quality</p>	<p>The area covered by these gardens is of significant size and not only contributes to, but largely defines the local character of this part of Ham Common. The site is valued by local people as evidenced by its recommendation for OOLTI protection by local Councillors and a large number of local residents. In addition, the designation of the gardens as OOLTI will also contribute to preserving and/or enhancing the setting of the Listed Building.</p>	<p>The site is relatively small and is very well screened on its boundary, to the point where it is very difficult to get any views into the site, therefore minimising any contribution it is considered to make to local residents.</p> <p>The site is privately owned and there is no public access to the site. When the Sisters' occupied the site, there was no public access except with their permission, which was only offered perhaps a couple of times a year, for example open garden days as part of the National Garden Scheme. As such, the value of the site to the local community can only be very limited.</p>	

					<p>The garden is subject to statutory protection due to its location within Ham Common Conservation Area and the setting of the Grade II listed Orford Hall. As such, the OOLTI designation is not required to contribute to preserving and/or enhancing the setting the listed building.</p>	
--	--	--	--	--	---	--

			<p>Value to local people for its presence and openness</p>	<p>The substantial local support received throughout the development of this Plan for the designation of this site as OOLTI demonstrates that the gardens are of value to local people for its presence and openness. It should be noted that the Council has first published its intention to designate the gardens as OOLTI in August 2014, and strong local community support has been received ever since then.</p>	<p>As stated above, the site is privately owned and there is no public access to the site. When the Sisters' occupied the site, there was no public access except with their permission, which was only offered perhaps a couple of times a year, for example open garden days as part of the National Garden Scheme. As such, the value to the local community can only be very limited.</p> <p>In addition, the openness of the site is indistinguishable from outside its boundaries, due to the aforementioned screening.</p>	
--	--	--	---	---	---	--

			<p>Immediate or longer views into and out of the site, including from surrounding properties</p>	<p>This is particularly relevant for the residents of Martingales Close, because its houses are on one side of the road only, the other side adjoining the Convent garden.</p>	<p>There is no right to a view in the English planning system. In any case, views into the site from the Martingales Close properties are limited due to the considerable distance from the first floor windows of Martingales Close properties to the site, in addition to numerous trees which screen the site boundary.</p>	
--	--	--	---	--	--	--

			<p>Contribution to a network of green spaces and green infrastructure as set out in policy LP12 in 5.1 'Green Infrastructure'</p>	<p>The garden lies in the Great South Avenue of Ham House, at the heart of the wildlife corridor. The gardens provide an important link as part of the green corridor in Ham, which runs between Richmond Park to the River Thames via Ham Common, St Michael's Convent and Avenue Lodge gardens, Grey Court School playing fields, Ham House avenues and gardens, and the Ham Lands.</p>	<p>The enclosed Rebuttal Briefing Note, prepared by Ecology Solutions (dated October 2017), was submitted during the Local Plan Examination. Page 7 of the Rebuttal demonstrates that the 'River Thames to Richmond Park Green Corridor' does not exist as a defined area or site, although it is considered that the Council's ecologist may be referring to the 'horse ride' running from Holly Hedge Field to Ham Common. As such the 'River Thames to Richmond Park Green Corridor' does not lie within or even adjacent to the site, but is separated from the site by a residential back garden and tennis court.</p>	
--	--	--	--	---	---	--

			<p>Value for biodiversity and nature conservation</p>	<p>The Council proposes to designate the gardens as Other Site of Nature Importance (OSNI) as part of the Local Plan due to its great environmental importance and biodiversity value.</p>	<p>As indicated by the Council, the gardens of the site are subject to a draft Other Site of Nature Importance Designation in the Local Plan. An OOLTI designation is therefore not required for biodiversity and nature conservation at the site.</p>	
			<p>In summary, the OSNI designation of the walled garden and the OOLTI designation of the gardens are unsound, conflicting with paragraph 182 of the NPPF, and should be removed from the Local Plan.</p> <p><i>[Enclosed – as previously published part of REP-026-01 Indigo Planning on behalf of Beechcroft Development Ltd – Hearings 4 & 7 – Site Allocations (SA 17): Rebuttal Briefing Note (dated October 2017), prepared by Ecology Solutions]</i></p>			
20	<p>Steven Simms, SSA Planning Limited on behalf of Kentucky Fried Chicken (Great Britain) Limited</p>	<p>MM16 Health and Well Being</p>	<p>Thank you for the opportunity to respond to your above consultation. We act for Kentucky Fried Chicken (Great Britain) Limited (respondent number 34-141). Our response relates to Main Modification number 16 to Policy LP 30 B and paragraphs 7.2.19 and 8.3.13-15</p> <p>We do not consider the Main Modification sound, because it retains a policy related to proximity to both primary and secondary schools and because it justifies this on the basis that “400m is a 5- 10 minute walk and it is suggested that this is the</p>	<p>The Council's position remains as set out at Examination.</p>		

			<p>maximum distance that students would walk to and back from in their lunch break”, yet it is clear that primary school children are not allowed to leave school premises alone and that secondary schools could simply implement a locked gates policy to prevent their pupils from doing so if they were concerned about the food they may eat.</p> <p>Moreover, there remains nothing in the evidence base to justify policies relating to the proximity of hot food takeaways from schools. Indeed, the evidence that we submitted to the hearings (particularly our Appendix D - Williams, J <i>et al</i>; Obesity Reviews (2014) 15, 359-374) found “very little evidence for an effect of the retail food environment surrounding schools on food purchases and consumption.”</p> <p>Consequently, we consider that the main modification is not justified and that it will not be effective. As there is no assessment of its likely impacts, positive or negative, and no indication of how many hot food takeaways might be needed to serve the borough, how many might be harmful, or indeed how many may be affected, it is impossible to conclude that the modification is positively prepared either.</p> <p>We accept that some evidence exists for controls on overall numbers of hot food takeaways and a policy based on controlling this could be sound.</p>	
21	Peter Willan on behalf of Old Deer Parking Working Group	MM2 Heritage Matters, MM23 Site Allocations	<p>In following-up the Old Deer Park Working Group’s formal response last week to the Council’s consultation on its proposed main modifications to the <i>Richmond-upon-Thames Local Plan</i> further to the Inspector’s examination, and in confirming our welcome to the proposed adjustments in the wording of Policies LP 1 and LP 3 and Site Allocations SA 22 – The Pools-on-the-Park Site and SA 23 – The Richmond Athletic Ground, the Group would wish to record very clearly our concern at the absence of sight of the the relevant parts of the Inspector’s report relating to</p>	Noted. The respondent has been informed that the consultation on the Main Modifications precedes the stage of the Inspector’s report.

			<p>the several issues we raised in our formal submission of 4th September 2017 <u>relating to the soundness of the Plan</u> (in relation to the <i>Proposals Map</i> and the boundary definitions relating to the Old Deer Park and to policies LP 5 , 6 and 14 which it contained) further to our repeatedly raising the relevant issues in our formal submissions to the Council of the 11th November, 2013, 19th July, 2014, 18th August, 2016 and 5th February, 2017.</p>	
--	--	--	---	--