

Ham and Petersham Neighbourhood Plan (Submission Version – September 2017)

Regulation 16 Consultation (6 December 2017 to 26 January 2018) – Schedule of Representations

ID	Name/Organisation	Section	Response
1	Marine Management Organisation (MMO)	General	<p>The Marine Management Organisation (MMO) is a non-departmental public body responsible for the management of England's marine area on behalf of the UK government. The MMO's delivery functions are; marine planning, marine licensing, wildlife licensing and enforcement, marine protected area management, marine emergencies, fisheries management and issuing European grants.</p> <p>Marine Licensing Activities taking place below the mean high water mark may require a marine licence in accordance with the Marine and Coastal Access Act (MCAA) 2009. Such activities include the construction, alteration or improvement of any works, dredging, or a deposit or removal of a substance or object below the mean high water springs mark or in any tidal river to the extent of the tidal influence. You can also apply to the MMO for consent under the Electricity Act 1989 (as amended) for offshore generating stations between 1 and 100 megawatts in England and parts of Wales. The MMO is also the authority responsible for processing and determining harbour orders in England, and for some ports in Wales, and for granting consent under various local Acts and orders regarding harbours. A wildlife licence is also required for activities that would affect a UK or European protected marine species.</p> <p>Marine Planning As the marine planning authority for England the MMO is responsible for preparing marine plans for English inshore and offshore waters. At its landward extent, a marine plan will apply up to the mean high water springs mark, which includes the tidal extent of any rivers. As marine plan boundaries extend up to the level of the mean high water spring tides mark, there will be an overlap with terrestrial plans which generally extend to the mean low water springs mark. Marine plans will inform and guide decision makers on development in marine and coastal areas. On 2 April 2014 the East Inshore and Offshore marine plans were published, becoming a material consideration for public authorities with decision making functions. The East Inshore and East</p>

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			<p>Offshore Marine Plans cover the coast and seas from Flamborough Head to Felixstowe. For further information on how to apply the East Inshore and Offshore Plans please visit our Marine Information System. The MMO is currently in the process of developing marine plans for the South Inshore and Offshore Plan Areas and has a requirement to develop plans for the remaining 7 marine plan areas by 2021.</p> <p>Planning documents for areas with a coastal influence may wish to make reference to the MMO's licensing requirements and any relevant marine plans to ensure that necessary regulations are adhered to. For marine and coastal areas where a marine plan is not currently in place, we advise local authorities to refer to the Marine Policy Statement for guidance on any planning activity that includes a section of coastline or tidal river. All public authorities taking authorisation or enforcement decisions that affect or might affect the UK marine area must do so in accordance with the Marine and Coastal Access Act and the UK Marine Policy Statement unless relevant considerations indicate otherwise. Local authorities may also wish to refer to our online guidance and the Planning Advisory Service soundness self-assessment checklist.</p> <p>Minerals and waste plans and local aggregate assessments If you are consulting on a mineral/waste plan or local aggregate assessment, the MMO recommend reference to marine aggregates is included and reference to be made to the documents below:</p> <ul style="list-style-type: none"> • The Marine Policy Statement (MPS), section 3.5 which highlights the importance of marine aggregates and its supply to England's (and the UK) construction industry. • The National Planning Policy Framework (NPPF) which sets out policies for national (England) construction minerals supply. • The Managed Aggregate Supply System (MASS) which includes specific references to the role of marine aggregates in the wider portfolio of supply. • The National and regional guidelines for aggregates provision in England 2005-2020 predict likely aggregate demand over this period including marine supply.

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			<p>The NPPF informed MASS guidance requires local mineral planning authorities to prepare Local Aggregate Assessments, these assessments have to consider the opportunities and constraints of all mineral supplies into their planning regions – including marine. This means that even land-locked counties, may have to consider the role that marine sourced supplies (delivered by rail or river) play – particularly where land based resources are becoming increasingly constrained.</p>
2	Sport England	General	<p>Thank you for consulting Sport England on the above neighbourhood plan.</p> <p>Government planning policy, within the National Planning Policy Framework (NPPF), identifies how the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Encouraging communities to become more physically active through walking, cycling, informal recreation and formal sport plays an important part in this process. Providing enough sports facilities of the right quality and type in the right places is vital to achieving this aim. This means that positive planning for sport, protection from the unnecessary loss of sports facilities, along with an integrated approach to providing new housing and employment land with community facilities is important.</p> <p>It is essential therefore that the neighbourhood plan reflects and complies with national planning policy for sport as set out in the NPPF with particular reference to Parts 73 and 74. It is also important to be aware of Sport England's statutory consultee role in protecting playing fields and the presumption against the loss of playing field land. Sport England's playing fields policy is set out in our Planning Policy Statement: 'A Sporting Future for the Playing Fields of England'. http://www.sportengland.org/playingfieldspolicy</p> <p>Sport England provides guidance on developing planning policy for sport and further information can be found via the link below. Vital to the development and implementation of planning policy is the evidence base on which it is founded. http://www.sportengland.org/facilities-planning/planning-for-sport/forward-planning/</p> <p>Sport England works with local authorities to ensure their Local Plan is underpinned by robust and up to date evidence. In line with Part 74 of the NPPF, this takes the form</p>

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			<p>of assessments of need and strategies for indoor and outdoor sports facilities. A neighbourhood planning body should look to see if the relevant local authority has prepared a playing pitch strategy or other indoor/outdoor sports facility strategy. If it has then this could provide useful evidence for the neighbourhood plan and save the neighbourhood planning body time and resources gathering their own evidence. It is important that a neighbourhood plan reflects the recommendations and actions set out in any such strategies, including those which may specifically relate to the neighbourhood area, and that any local investment opportunities, such as the Community Infrastructure Levy, are utilised to support their delivery.</p> <p>Where such evidence does not already exist then relevant planning policies in a neighbourhood plan should be based on a proportionate assessment of the need for sporting provision in its area. Developed in consultation with the local sporting and wider community any assessment should be used to provide key recommendations and deliverable actions. These should set out what provision is required to ensure the current and future needs of the community for sport can be met and, in turn, be able to support the development and implementation of planning policies. Sport England's guidance on assessing needs may help with such work. http://www.sportengland.org/planningtoolsandguidance</p> <p>If new or improved sports facilities are proposed Sport England recommend you ensure they are fit for purpose and designed in accordance with our design guidance notes. http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/</p> <p>Any new housing developments will generate additional demand for sport. If existing sports facilities do not have the capacity to absorb the additional demand, then planning policies should look to ensure that new sports facilities, or improvements to existing sports facilities, are secured and delivered. Proposed actions to meet the demand should accord with any approved local plan or neighbourhood plan policy for social infrastructure, along with priorities resulting from any assessment of need, or set out in any playing pitch or other indoor and/or outdoor sports facility strategy that the local authority has in place.</p>

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			<p>In line with the Government's NPPF (including Section 8) and its Planning Practice Guidance (Health and wellbeing section), links below, consideration should also be given to how any new development, especially for new housing, will provide opportunities for people to lead healthy lifestyles and create healthy communities. Sport England's Active Design guidance can be used to help with this when developing planning policies and developing or assessing individual proposals.</p> <p>Active Design, which includes a model planning policy, provides ten principles to help ensure the design and layout of development encourages and promotes participation in sport and physical activity. The guidance, and its accompanying checklist, could also be used at the evidence gathering stage of developing a neighbourhood plan to help undertake an assessment of how the design and layout of the area currently enables people to lead active lifestyles and what could be improved.</p> <p>NPPF Section 8: https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthy-communities</p> <p>PPG Health and wellbeing section: https://www.gov.uk/guidance/health-and-wellbeing</p> <p>Sport England's Active Design Guidance: https://www.sportengland.org/activedesign</p> <p><i>(Please note: this response relates to Sport England's planning function only. It is not associated with our funding role or any grant application/award that may relate to the site.)</i></p>
3	Amec Foster Wheeler on behalf of National Grid	General	<p>National Grid has appointed Amec Foster Wheeler 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 above Neighbourhood Plan consultation.</p> <p>About National Grid National Grid owns and operates the high voltage electricity transmission system in England and Wales and operate the Scottish high voltage transmission system.</p>

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			<p>National Grid also owns and operates the gas transmission system. In the UK, gas leaves the transmission system and enters the distribution networks at high pressure. It is then transported through a number of reducing pressure tiers until it is finally delivered to our customers. National Grid own four of the UK's gas distribution networks and transport gas to 11 million homes, schools and businesses through 81,000 miles of gas pipelines within North West, East of England, West Midlands and North London.</p> <p>To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, National Grid wishes to be involved in the preparation, alteration and review of plans and strategies which may affect our assets.</p> <p>Specific Comments</p> <p>An assessment has been carried out with respect to National Grid's electricity and gas transmission apparatus which includes high voltage electricity assets and high pressure gas pipelines, and also National Grid Gas Distribution's Intermediate and High Pressure apparatus.</p> <p>National Grid has identified that it has no record of such apparatus within the Neighbourhood Plan area.</p> <p><u>Gas Distribution – Low / Medium Pressure</u></p> <p>Whilst there is no implications for National Grid Gas Distribution's Intermediate / High Pressure apparatus, there may however be Low Pressure (LP) / Medium Pressure (MP) Gas Distribution pipes present within proposed development sites. If further information is required in relation to the Gas Distribution network please contact plantprotection@nationalgrid.com</p> <p>Key resources / contacts</p> <p>National Grid has provided information in relation to electricity and transmission assets via the following internet link:</p> <p>http://www2.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files/</p>

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			<p>The electricity distribution operator in Richmond LBC is UK Power Networks. Information regarding the transmission and distribution network can be found at: www.energynetworks.org.uk</p>
4	Malcolm Rothera	Policy O4a – Ham Close	<p>I am extremely concerned by Richmond Housing Partnership's plans to over-develop Ham Close. Having lived in the area for six years, recently purchasing a family home in Ham, I am dismayed by RHP's intention massively to increase the number of units within Ham Close, as an excuse that it is the only way they can afford to renovate the existing buildings. This seems to me a thinly-disguised attempt to make as much money as possible from the site, without considering the detrimental effects such development would have on the character of the area and the huge strain it would place on local infrastructure, much of which is simply not suited to such density of numbers. In particular, the local road system would be unable to cope with potentially three or more times the number of vehicles the current Ham Close residents have, as there are unavoidable pinch points at the junctions of Sandy Lane and Petersham Road, Ham Common and Petersham Road and Dukes Avenue and Richmond Road. These junctions already suffer from significant queuing at peak times, particularly during the school run, if these plans were to go ahead they would result in far worse traffic, in turn resulting in far worse air quality, in an area with a number of schools close by whose students' health would inevitably suffer. The Council has a duty of care to protect its residents from such effects. Giving the go-ahead to RHP's massive expansion plans would be a direct breach of this duty of care. I understand that the Council are probably under enormous pressure to build more homes in the Borough, however this cannot go ahead without due consideration of the effects on the existing residents. Simply increasing numbers in an area which cannot support them would result in an area which is unpleasant for everyone who lives there, both new residents and old. There must come a time at which it is permissible to say 'this part of the Borough is full and cannot support further development'. Under the Basic Conditions, this plan would most certainly NOT contribute to the achievement of sustainable development and would almost certainly be incompatible with EU obligations on air quality. I urge you to do all you can to decline RHP's plans in anything like their current form.</p>

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5	John Perry , Chair of a flooding sub-committee of the Twickenham Society and Richmond Environmental Information Centre	General Paragraph 8.7.1 Paragraph 8.8.7	<p>There should be more information and direction about flooding</p> <p>8.7.1 The risk of river and tidal flooding can be expected to increase as a result of climate change with most of the Thames floodplain lying within Ham Lands.</p> <p>Please add: It should be mentioned that most of the rubble from the London blitz was dumped within the 103 acres of Ham Lands and that the Environment Agency is conducting a survey as to the removal of the same. The possibility of removing the rubble has been talked about for twenty years. In some places the rubble is 5 metres deep. Our local authority should welcome the prospect of such removal as it would improve the floodplain and assist the building of a prototype lagoon in the Thames Estuary for hydro-electric production using the constant rise and fall of the tide.</p> <p>Unless active steps are taken the Government will fail to reach the target of reducing carbon emissions by 57 per cent by 2030 compared with 1990 levels</p> <p>Our local authority should also support the building of a hydro-electric station at Teddington Lock which was turned down on appeal as the Judge concluded (wrongly in the opinion of many) that the same was in violation of the green belt.</p> <p>8.8.7 Each incremental increase in hard surface increases the possibility of surface water flooding</p> <p>Please add: Our local authority should do more to encourage residents, businesses, schools and hospitals to make surfaces porous.</p> <p>The towpath and river bank are in urgent need of repair.</p>
6	Michael Atkins on behalf of the Port of London Authority	General Policy T2 – Improvements to Transport Infrastructure	<p>Thank you for consulting the Port of London Authority (PLA) on the draft Ham and Petersham Neighbourhood Plan: Submission Version, which aims to build on the identity of Ham and Petersham as a distinct and sustainable mixed community giving great opportunities to live and work within a semi-rural historic landscape.</p> <p>For information, the PLA is the statutory harbour authority for the tidal Thames</p>

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		Section 5 – Community Facilities Section 7 – Green Spaces	<p>between Teddington and the Thames Estuary. Its statutory functions include responsibility for conservancy, dredging and maintaining the public navigation and controlling vessel movements and its consent is required for the carrying out of all works and dredging in the river and the provision of moorings. As the body responsible for licensing river works and moorings, the PLA has a special regard to their continued viability for unimpeded use by the PLAs licenses. The PLA's functions also include for promotion of the use of the river as an important transport corridor to London.</p> <p>Whilst the PLA in principle support the creation of a Neighbourhood Plan for this area, it is considered that more could be made in the document of the areas beneficial location in close proximity to the River Thames, and the opportunities and strengths that this brings. The PLA's vision for the Tidal Thames (2016) sets a number of goals to unlock the potential growth in all types of river use in the future, including improved trade, passenger transport and greater sport and recreation participation as well as ensuring the Thames continues to improve both in environmental and cultural terms.</p> <p>It is noted that in the document there is reference to the Thames Towpath, as well as the Hammerton Ferry which provides a pedestrian crossing across the Thames in this area, as part of the travel and streets section of the plan. The PLA consider that further promotion of the use of the River Thames and/or the Thames Path would further strengthen this chapter, for example it is noted that the plan states that the towpath is used more for recreational purposes rather than utility purposes. The positive aspect of this recreational link should be emphasised in the plan, particularly in regard to maintaining and improving the health and wellbeing of its residents. In general improvements to the towpath and riverside access routes should be referred to as part of policy T2 on improvements to transport infrastructure to help strengthen this policy.</p> <p>The PLA note that within policy T2 a potential foot/cycle bridge is mentioned linking Ham with Twickenham, and that an assessment of the viability of such a crossing is required. The PLA must be involved in any discussions on a potential crossing over the River Thames at an early stage at this location to ensure all safety and navigational issues are fully addressed.</p>

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			<p>The PLAs consider that more could be made of the recreational benefits and opportunities that exist for this area in relation to the River Thames and its environment. The River Thames in this area is identified as a Sport Opportunity Zone in the PLAs Thames Vision and there are a number of facilities (including the Petersham & Ham Sea Scouts, Richmond Canoe Club and Thames Young Mariners) that operate in the area. There is potential in this plan to highlight these types of facilities in either section 5 on Community Facilities or section 7 on Green Spaces and promote their greater use for the local community to help establish the continued use of the River Thames along the water frontage, which would accord with the PLAs Thames Vision and it's goals, which include increasing participation on and alongside the Thames and improving access to the historic environment along the Thames. Given the importance of the River Thames and its waterways in this Neighbourhood Plan area it is considered important to continue to protect and enhance these areas through relevant policies, not just within Local and Regional plans but also within Neighbourhood Plans such as this.</p>
7	Pam Bennett	General	<p>I am concerned that, although there are a few references to the need for increased GP practice provision in the Plans, there are no details. As is known, there is one GP practice in the area, which compares badly with practice provision in the rest of the Borough. With additional housing a Health Centre with at least one further practice plus additional services, is required. Has there been any discussion with the existing GP practice and with the local Health Trust? And what are the outcomes of any such discussions? If this is not addressed there are going to be real problems in the future for the residents of Ham and Petersham.</p>
8	Savills on behalf of Thames Water Utilities Ltd	Policy E4 – Water Efficiency Section 8.7 – Managing Flood Risk	<p>Thames Water Utilities Ltd (Thames Water) Property Services function is being delivered by Savills (UK) Limited as Thames Water's appointed supplier. Savills are therefore pleased to respond to the above consultation on behalf of Thames Water in relation to their statutory undertakings.</p> <p>Thames Water is the statutory water and sewerage undertaker for the Borough and is hence a 'specific consultation body' in accordance with the Town & Country Planning (Local Planning) Regulations 2012. We submitted detailed comments and suggested</p>

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		Policy E5 – Sustainable Drainage (SuDs) Section 8.9 Policy E6 – Permeable Forecourts	<p>changes to the previous consultation on the draft Neighbourhood Plan and are disappointed that these have not been incorporated into the current consultation version. We therefore have the following comments on behalf of Thames Water:</p> <p><u>Policy E4: Water Efficiency and Omission of Policy covering Water Supply and Wastewater Infrastructure</u></p> <p>Thames Water support the policy in principle, but consider it should be improved in relation to Water Supply and Sewerage/Wastewater Infrastructure and that this topic be dealt with in a separate policy.</p> <p>A key sustainability objective for the preparation of Local Plans and Neighbourhood Plans should be for new development to be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure. New development should be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure. Paragraph 156 of the National Planning Policy Framework (NPPF), March 2012, states: “<i>Local planning authorities should set out strategic policies for the area in the Local Plan. This should include strategic policies to deliver:.....the provision of infrastructure for water supply and wastewater....</i>”</p> <p>Paragraph 162 of the NPPF relates to infrastructure and states: “<i>Local planning authorities should work with other authorities to: assess the quality and capacity of infrastructure for water supply and wastewater and its treatment.....take account of the need for strategic infrastructure including nationally significant infrastructure within their areas.</i>”</p> <p>The web based National Planning Practice Guidance (NPPG) published in March 2014 includes a section on ‘water supply, wastewater and water quality’ and sets out that Local Plans should be the focus for ensuring that investment plans of water and sewerage/wastewater companies align with development needs. The introduction to this section also sets out that “<i>Adequate water and wastewater infrastructure is needed to support sustainable development</i>” (Paragraph: 001, Reference ID: 34-001-20140306).</p>

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			<p>Policy 5.14 of The London Plan, March 2015 is directly relevant as it relates to Water Quality and Wastewater Infrastructure and Policy 5.15 relates to Water Use and Supplies. Policy SI5 of the Replacement Draft London Plan, December 2017 relates to water/wastewater infrastructure. Policy LP 23 of the Richmond Local Plan is also directly relevant as it relates to water/sewerage infrastructure.</p> <p>It is important to consider the net increase in water and wastewater demand to serve the development and also any impact that developments may have off site, further down the network. It is therefore important that developers demonstrate that adequate water supply and wastewater infrastructure capacity exists both on and off the site to serve the development and that it would not lead to problems for existing users. In some circumstances this may make it necessary for developers to carry out appropriate reports and appraisals to ascertain whether the proposed development will lead to overloading of existing water and sewerage infrastructure. Where there is a capacity problem and no improvements are programmed by the water company, then the developer needs to contact the water company to agree what improvements are required and how they will be delivered prior to any occupation of the development.</p> <p>Thames Water consider that there should be a separate policy covering 'Water Supply and Sewerage/Wastewater Infrastructure' so that the Neighbourhood Plan is in accordance with the London Plan/Richmond Local Plan, along the lines of the following:</p> <p><u>Water Supply, Wastewater & Sewerage Infrastructure</u></p> <p><i>Developers will be required to demonstrate that there is adequate water supply, waste water capacity and surface water drainage both on and off the site to serve the development and that it would not lead to problems for existing or new users. In some circumstances it may be necessary for developers to fund studies to ascertain whether the proposed development will lead to overloading of existing water and/or waste water infrastructure.</i></p> <p><i>Drainage on the site must maintain separation of foul and surface flows.</i></p>

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			<p><i>Where there is an infrastructure capacity constraint the Council will require the developer to set out what appropriate improvements are required and how they will be delivered.</i></p> <p>Water Efficiency</p> <p>The Environment Agency has designated the Thames Water region to be “seriously water stressed” which reflects the extent to which available water resources are used. Future pressures on water resources will continue to increase and key factors are population growth and climate change.</p> <p>Water conservation and climate change is a vitally important issue to the water industry. Not only is it expected to have an impact on the availability of raw water for treatment but also the demand from customers for potable (drinking) water. Therefore, Thames Water supports water conservation and the efficient use of water. Thames Water support the mains water consumption target of 110 litres per head per day as set out in the NPPG (Paragraph: 015 Reference ID: 56-015-20150327) and the reference to this in the Neighbourhood Plan, but consider that this requirement should be included within a Policy.</p> <p>Thames Water have a water efficiency website: http://www.thameswater.co.uk/save-water/3786.htm</p> <p>Customers can discover how you can start saving water, help protect the environment, reduce your energy bill and even cut your water bill if you have a meter. You can calculate your water use, see how you compare against other Thames Water customers and the Government's target, and get lots of hints and tips on how to save water. Thames Water customers can also order a range of free devices to help save water. The Policy/supporting text could make reference to this guidance.</p> <p>However, managing demand alone will not be sufficient to meet increasing demand and Thames Water adopt the Government's twin-track approach of managing demand for water and, where necessary, developing new sources, as reflected in the latest Thames Water Water Resource Management Plan.</p>

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			<p>Thames Water are required to produce, every five years, a Water Resources Management Plan (WRMP), setting out how they plan to maintain the balance between supply and demand for water over a minimum 25 year period. Thames Water's current WRMP was published in 2014 and covers the period 2015-2040 ('WRMP14'). In December 2017, Thames Water submitted our draft plan to Defra in December 2017, and pending approval from Defra, expect to undertake a 3 month public consultation on the draft WRMP starting in February 2018. Following the public consultation Thames Water will publish a Statement of Response setting out their response to the comments they received in August 2018.</p> <p><u>Section 8.7 Managing Flood Risk</u></p> <p>Thames Water supports the section in principle, but considers that it should be improved in relation to sewer flooding.</p> <p>The NPPG states that a sequential approach should be used by local planning authorities in areas to be at risk from forms of flooding other than from river and sea which includes "<i>Flooding from Sewers</i>". The flood risk section should therefore make reference to 'sewer flooding' and an acceptance that flooding can occur away from the flood plain as a result of development where off site sewerage infrastructure is not in place ahead of development.</p> <p>Thames Water's main concerns with regard to subterranean development are:</p> <ul style="list-style-type: none"> 1) The scale of urbanisation is impacting on the ability of rainwater to soak into the ground resulting in more rainfall in Thames Water's sewerage network when it rains heavily. New development needs to be controlled to prevent an increase in surface water discharges into the sewerage network. 2) By virtue of their low lying nature basements are vulnerable to many types of flooding and in particular sewer flooding. This can be from surcharging of larger trunk sewers but can also result from operational issues with smaller sewers such as blockages. Basements are generally below the level of the

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			<p>sewerage network and therefore the gravity system normally used to discharge waste above ground does not work. During periods of prolonged high rainfall or short duration very intense storms, the main sewers are unable to cope with the storm flows.</p> <p>Flood Risk policy should therefore require all new basements to be protected from sewer flooding through the installation of a suitable (positively) pumped device. Clearly this criterion of the policy will only apply when there is a waste outlet from the basement i.e. a basement that includes toilets, bathrooms, utility rooms etc. Applicants should show the location of the device on the drawings submitted with the planning application.</p> <p>In relation to groundwater, the pumping of groundwater into the sewer network should be avoided. It is also recommended that groundwater levels are monitored and appraised against the impacts of subterranean development.</p> <p>With regard to paragraph 8.7.4 and surface water flooding/drainage, Thames Water request that the following paragraph should be included: <i>"It is the responsibility of a developer to make proper provision for surface water drainage to ground, water courses or surface water sewer. It must not be allowed to drain to the foul sewer, as this is the major contributor to sewer flooding."</i></p> <p><u>Policy E5 SuDS</u></p> <p>Thames Water supports the policy in principle, subject to the following comments.</p> <p>Thames Water recognises the environmental and economic benefits of surface water source control, and encourages its appropriate application, where it is to the overall benefit of their customers. However, it should also be recognised that SuDS are not appropriate for use in all areas, for example areas with high ground water levels or clay soils which do not allow free drainage. SuDS also require regular maintenance to ensure their effectiveness.</p> <p>Limiting the opportunity for surface water entering the foul and combined sewer</p>

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			<p>networks is of critical importance to Thames Water. Thames Water has advocated an approach to SuDS that limits as far as possible the volume of and rate at which surface water enters the public sewer system. By doing this, SuDS have the potential to play an important role in helping to ensure the sewerage network has the capacity to cater for population growth and the effects of climate change.</p> <p>SuDS not only help to mitigate flooding, they can also help to:</p> <ul style="list-style-type: none"> • improve water quality • provide opportunities for water efficiency • provide enhanced landscape and visual features • support wildlife • and provide amenity and recreational benefits. <p><u>Section 8.9 and Policy E6</u></p> <p>Thames Water support the policy promoting permeable forecourts.</p>
9	Sharon Jenkins on behalf of Natural England	General	Natural England does not have any specific comments on this draft neighbourhood plan.
10	Heather Archer on behalf of Highways England	General	<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 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).</p> <p>Having examined the draft Neighbourhood Development Plan, we do not have any comments to this consultation at this time as there being no evident potential impacts on the SRN.</p>

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11	David English on behalf of Historic England	Figure 2.1 Paragraph 2.2.2 Glossary Section 7 – Green Spaces.	<p>Thank you for consulting Historic England on the submission draft of the Ham and Petersham Neighbourhood Plan. The Government, through the Localism Act (2011) and Neighbourhood Planning (General) Regulations (2012), has enabled local communities to take a more pro-active role in influencing how their neighbourhood is managed. The Regulations require Historic England, as a statutory agency, be consulted on Neighbourhood Plans where the Neighbourhood Forum consider our interest is affected by the Plan. As Historic England's remit is to advise on proposals affecting the historic environment our comments in this letter, further to those of 9th March 2017 on the Pre-submission consultation on the Ham and Petersham Neighbourhood Plan, relate to the policies and projects in the draft Plan that relate to heritage.</p> <p>Historic England welcomes the creation of this Plan and the ways that it seeks to engage with heritage and the local character of Ham and Petersham. We note that the Plan has been the subject of a great amount of work by the Neighbourhood Forum, and are particularly pleased to see that detailed assessments of local character have informed the approach in the Plan. Considering the great contribution that the historic environment makes to the character of Ham and Petersham, which is recognised through the numerous heritage designations covering much of the neighbourhood area, we particularly welcome the inclusion of policy objectives covering character and heritage.</p> <p>At this stage our principal comment is to strongly encourage you to make clear references to the registered parks and gardens within the neighbourhood area, or adjacent to it. This is because of the importance of the green character of the neighbourhood area. These designated landscapes include the Grade II* registered Ham House Garden and Grade I registered Richmond Park. As exceptionally highly designated heritage assets we recommend illustrating the spatial extent of these landscapes on the character and heritage map (figure 2.1), as well as in the text in paragraph 2.2.2. You may also wish to include a reference in the Glossary to Registered Landscapes, and include a hyperlink to the register entries that are available via the Historic England website. We note that the protection afforded these heritage assets and their settings should support several of the objectives in the Plan including those in section 7 relating to Green Spaces.</p>

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			<p>Conclusion</p> <p>We hope that these comments are helpful. Please note that this advice is based on the information that has been provided to us and does not affect our obligation to advise on, and potentially object to any specific development proposal which may subsequently arise from this Neighbourhood Plan, and which may have adverse effects on the environment. We trust this advice is of assistance in the preparation of your Plan.</p>
12	Charles Muriithi on behalf of Environment Agency	General	<p>Thank you for consulting the Environment Agency on the above. The neighbourhood plan supports the strategic development needs set out in the in the borough Local Plan and aim positively to support local development as outlined in paragraph 16 of the National Planning Policy Framework.</p> <p>We consider the draft neighbourhood plan meets the basic conditions and other matters required to consider under paragraph 8 of Schedule 4B to the Town and Country Planning Act 1990 (as amended).</p>
13	Sarah Hoad on behalf of Transport for London (TfL)	Policy T1 – Travel Plans Paragraph 4.3.6 Policy T2 – Improvements to Transport Infrastructure Policy T3 – Motor Vehicle and Cycle Storage	<p><i>Please note that the following comments represent the views of Transport for London (TfL) officers. These comments are made entirely on a ‘without prejudice’ basis and represent TfL’s views on the above neighbourhood area application, as well as wider protocol issues around TfL’s role in the Neighbourhood Planning process.</i></p> <p>The Ham and Petersham Neighbourhood Area experiences low levels of connectivity with limited access to rail services and a total of two bus routes. There is one main road which links the area to Richmond and Kingston, although there are no sections of the Transport for London Road Network (TLRN) or the Strategic Road Network (SRN). As such, the majority of the area has a Public Transport Accessibility Level (PTAL) of 0-1 (on a scale of 0 to 6b, where 6 is the most accessible), with some areas of PTAL 2.</p> <p>TfL provided comments to the Ham and Petersham Neighbourhood Forum on the draft Neighbourhood Plan in March 2017. It should be noted that the draft new London Plan has since been published for consultation, therefore the following comments take the policies of the new London Plan into consideration, which would help to ‘future proof’ the area.</p>

ID	Name/Organisation	Section	Response
			<p>proof' the Neighbourhood Plan.</p> <p>Policy T1 requires residential development above 10 units to be supported with a Transport Assessment and Travel Plan, with reference to TfL's Transport Assessment Best Practice Guidance. This is supported in line with draft new London Plan policy T4.</p> <p>With regards to the provision of car club facilities, this should seek to reduce off-street parking rather than add to the total parking provision in new development. For compliance with London Plan policy, paragraph 4.3.6 in the supporting text should be amended to remove the words "<i>in addition to</i>" and it should be clarified in the text that the purpose of off-street car clubs is to reduce car parking provision in larger developments.</p> <p>Reference to improving walking routes is provided in Policy T2, which is supported. Specific reference should be made in Policy T2 to the strategic walking routes within this area – The Thames Path and the Capital Ring. Opportunities to enhance these routes would be welcomed in line with the draft new London Plan policy T3.</p> <p>Policy T2 of the Neighbourhood Plan also refers to improvements to the bus network, as requested in TfL's previous comments. This is supported in accordance with the draft new London Plan policy T4. TfL welcome further discussions specifically with regards to improvements to the bus network in this area.</p> <p>Reference is made in the supporting text to relevant TfL design guidance, including the Healthy Streets approach which is promoted in draft new London Plan policy T2.</p> <p>Policy T3 sets out cycle parking requirements for residential development at a ratio of one cycle space per bed space. This is in accordance with the current minimum London Plan standards. With respect to the draft new London Plan it should be noted that the minimum cycle parking standards for residential development has increased for one bedroom units, to provide a minimum of 1.5 spaces per unit (Table 10.2, draft new London Plan). Local compliance with these new London Plan standards would obviously 'future proof' the Plan.</p>

ID	Name/Organisation	Section	Response
			<p>With respect to the draft new London Plan policy, the specific reference to policy 6.13 of the current London Plan in Policy E3 of the Neighbourhood Plan should be removed to ensure future compliance with renumbered London Plan policies.</p>
14	Lichfields on behalf of West London Mental Health NHS Trust	Policy O5 Paragraphs 9.13.2, 9.14.1, 9.14.2, 9.14.3	<p>On behalf of our client, the West London Mental Health NHS Trust (the Trust), we write to submit representations in relation to the Submission Version of the Ham and Petersham Neighbourhood Plan (September 2017) with specific reference to Policy 05 – Cassel Hospital.</p> <p>The Trust owns Cassel Hospital on Ham Common. The Cassel Specialist Personality Disorder Service (CSPD) is a national service which occupies approximately half the premises at Cassel Hospital. The remainder of the buildings are vacant and have been since 2011. The Trust may therefore be required to consider the future of the site which could include: the retention of the CSPD on site; the potential relocation of the CSPD off-site either in part or in full; the site being rented out either in part or in full; and/or the disposal of part or all of the site.</p> <p>The Trust has been proactively working with the Neighbourhood Forum and has attended several meetings in 2016 and 2017. The purpose of this has been to discuss the policy wording in order to seek to align the Trust and local community's aspirations for the site in a positively prepared policy and secure the long term future of the site. At this point in time, no decision has been made by the Trust in relation to the future of Cassel Hospital site but it is possible that a decision will be made over the lifetime of the Neighbourhood Plan. As such, it is important that the policy wording is sufficiently flexible to support and safeguard a future for the Cassel Hospital site. The unintended consequence of not providing a positive planning policy framework is that it could deter plans coming forward for the site in the future potentially resulting in a lack of investment in the site's heritage assets and grounds. This is in neither the Trust nor the community's interests.</p> <p>Cassel Hospital site</p> <p>The Trust welcomes a specific policy for Cassel Hospital. As set out above, a strategy for the site may materialise over the lifetime of the Neighbourhood Plan and as such, it</p>

ID	Name/Organisation	Section	Response
			<p>is essential that Policy 05 is sufficiently flexible to accommodate a range of scenarios for the site. As such, the Trust supports the revised wording in the submission version of the Plan which provides greater flexibility to encourage development whilst not placing undue constraints on potential schemes.</p> <p>In particular, the Trust notes that part (v) of the draft Policy states:</p> <p><i>“Development in non-designated parts of the grounds will be considered acceptable and could include affordable residential development with some supported housing for older people and/or community uses.”</i></p> <p>This recognition of the acceptability of development on less sensitive parts of the site is supported by the Trust. Given the site's constraints, which include a Grade II listed building and location within a Conservation Area; it is highly likely that some residential development will be required in order to support a viable development scheme at this site. The flexible policy wording is welcomed and is considered to be in line with Basic Condition (a) to have regard to national policies as set out under paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990. If proposals are not viable, the condition of this Grade II listed building and its grounds would deteriorate through a lack of investment.</p> <p>Notwithstanding this, given that market residential development is likely to be part of any viable scheme, we consider that part (v) of the policy should specifically refer to the acceptability of private residential development at the site. In the context of the proposed increased annual housing targets for the borough from 315 to 811 in the draft London Plan (2017) and to 1,047 dwellings per annum under the Government's new standard methodology for calculating objectively assessed need the site could make a valuable contribution to meeting these increased housing targets. Explicit support for residential development would therefore contribute to sustainable development through its contribution to meeting local housing need in line with Basic Condition (d) and would have regard to national advice as required by Basic Condition (a).</p> <p>The Trust also notes that the draft policy and supporting text sets out some requirements that are unreasonable, onerous and not justified in planning terms.</p>

ID	Name/Organisation	Section	Response
			<p>Paragraph 9.13.2 states that the “Neighbourhood Plan seeks to retain and enhance the listed buildings and associated grounds as an asset for the community” and that “the site could also be a suitable location for a new changing room or club house serving the historic cricket ground on Ham Common.” The requirement for public access is included in the policy wording which states under part (ii) that “provision for managed public access including a pedestrian and cycle route between Dukes Avenue and Ham Common will be encouraged.”</p> <p>The Trust is concerned regarding the misleading reference to existing community uses. The CSPD provides a national service and as such the site does not comprise an existing dedicated local community asset or use. In addition, neither the building nor the grounds are publicly accessible and there is no intention they will be made so in the future. Whilst the Trust is open to the possibility of delivering some form of social/community use on the site as part of a wider redevelopment scheme, the policy requirements to provide public access to the grounds, and provide a new cricket pavilion are unreasonable in planning terms and likely to hinder finding a viable future use or uses coming forward for the site as a whole. Accordingly, in order for the Plan to achieve sustainable development as required by Basic Condition (d), it is considered that these requirements should be removed from the policy wording and supporting text.</p> <p>Proposed alternative wording</p> <p>Taking the above into account, we provide below alternative policy wording (new text in bold):</p> <p>1. Para 9.13.2. “The Neighbourhood Plan seeks to retain and enhance preserve the listed buildings and associated grounds as an asset for the community, while realising the potential of the site for suitable uses and possible new development, which could fund improvements to the listed buildings and the grounds. The proximity to Ham Parade and bus routes to Richmond and Kingston makes the site particularly suitable for new housing, which may include some housing for older people, for older people if no replacement community use can be identified. The site could also be a suitable location for a new changing room or club house serving the historic cricket ground on Ham Common.”</p>

ID	Name/Organisation	Section	Response
			<p>The above amendments are proposed to ensure consistency with the requirements of Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990; to provide greater flexibility by removing the reference to providing new housing specifically for older persons; to remove reference in the text that the site is an existing community asset; and to reflect that the Trust does not have the authority to provide new cricket facilities on the site.</p> <p>2. Para. 9.14.1: “Development proposals for the Cassel Hospital site should meet the following requirements. Alternative uses to the existing health services provision could be considered, including some community use, subject to its compatibility with the listed building and preserving or enhancing the character or appearance of the Conservation Area:</p> <ul style="list-style-type: none"> i. Explore the potential to open up views into the site from Ham Common and Dukes Avenue; ii. Maintain and enhance the historic layout, planting and biodiversity of the grounds. Provision for managed public access including a pedestrian and cycle route between Dukes Avenue and Ham Common will be encouraged; iii. Rationalise access to the site which may include a new pedestrian/vehicular access; iv. Enhance the setting of the listed buildings, particularly in relation to Ham Common. v. Development in the non-designated parts of the grounds will be considered acceptable including residential development, which and could include affordable residential development and / or with some supported housing for older people, and / or community uses.” <p>There is no existing public access at the site and future development schemes must provide flexibility for the possibility that some services may remain at the site. Providing public access to the grounds is not compatible with the existing CSPD service and will not be provided by the Trust. In addition, the text in relation to enhancing the setting of the listed building has been amended. To make the policy clear in its intentions it is considered that reference should be made to Section 66(1) and Section 72(2) of the Planning (Listed Building and Conservation Areas) Act 1990 which provides the statutory test in relation listed buildings and Conservation Areas</p>

ID	Name/Organisation	Section	Response
			<p>respectively. It requires proposals that affect listed buildings to pay special regard to preserving the building, its setting or any features of special architectural or historic interest. It also proposes amendments to ensure that the requirements in relation to Conservation Areas is also consistent with the statutory sets set out in Section 72(2) of the same Act, which requires special attention to be paid to the desirability of preserving or enhancing the character or appearance of the Conservation Area.</p> <p>3. Para. 9.14.2: <i>"This is a prominent and important site within the Neighbourhood Area and the WLMHT is currently considering futures uses and requirements. A collaborative and proactive approach between the WLMHT and / or a future developer and the Forum should be adopted in order to encourage appropriate development should the site become available over the plan period. to achieve a development which meets the Trust's objectives and the community's aspirations could be assisted by a development brief to identify development potential and guide the way the site is to be enhanced. The least sensitive parts of the grounds front onto Warners Lane on the south-western boundary of the site."</i></p> <p>We propose that reference to the production of a development brief is removed from the policy. The Trust is not in a position to confirm if the site will come forward in full, in part or at all at this stage, and Pg. 4/4 15351281v3 a development brief is not considered to be necessary in any event – the site is in single ownership and collaborative working between the Forum and the Trust could take a number of different forms at the appropriate time.</p> <p>4. Para. 9.14.3: <i>"This large and prominent site within the Ham Common Conservation Area is currently underused and in danger of falling into disrepair. Development of the site for residential development and/or some community use either for the existing or alternative community use or for residential use including affordable older persons' housing would secure the future of the listed building and the future management of the important grounds. This should include managed public access to the grounds. This builds on Policy SA 16 of the Richmond Local Plan."</i></p> <p>The proposed amendments to the text focus on creating greater flexibility for development options at the site and removing the requirements for public access.</p>

ID	Name/Organisation	Section	Response
15	Quod on behalf of Richmond Housing Partnership Ltd	General Policy O4a – Ham Close Policy H5 – Design Principles for Housing Development	<p>1. Background RHP are a non-for-profit housing association who own freehold ownership of the Ham Close Estate. As you will be aware, RHP have recently undergone a number of consultation exercises with residents, businesses and local organisations on proposed approaches for the regeneration of Ham Close estate. In November 2016 consultation with residents and stakeholders indicated support for redevelopment including building up to 6 storeys high in the centre of the site.</p> <p>RHP are therefore in support of the inclusion of the Ham Close estate within Policy O4a – Ham Close as an area identified as an opportunity area for change, recognising its designation within the draft RBR Local Plan Policy SA15 and RHP's intentions for the redevelopment of the site. Following a review of the draft Neighbourhood Plan, RHP do however have a number of general and specific comments on parts of the Plan, which are set out below.</p> <p>2. Representations 2.1 General Comments</p> <p>As you will be aware, the National Planning Policy Guidance (NPPG) requires Neighbourhood Plans to support the strategic development needs set out in the Local Plan and must be in conformity with strategic policies of the development plan (Paragraphs 004 and 009). This requirement should be reflected under part 1.4 of the Neighbourhood Plan.</p> <p>A number of the draft policies within the Neighbourhood Plan require for development to be carried out in accordance with Richmond's Local Plan Policies, whilst no additional area specific policies or details are provided in addition to these Local Plan policies. It is not considered such policies need to be repeated within the Neighbourhood Plan as reference would be had to the Local Plan policies regardless. Such repetitions should therefore be deleted within the Neighbourhood Plan.</p> <p>2.2. Policy H5 Part 3.7.1 of Policy H5 states the height, scale, massing and site layout of new housing developments will be based on the immediate context and surrounding</p>

ID	Name/Organisation	Section	Response
			<p>housing identified in the Character and Context Analysis. New housing developments should not be required to replicate the immediate surroundings, whilst different heights and layouts can complement surrounding development without being like for like. This requirement is also contradictory to paragraph 9.9.3 under Policy O4a – Ham Close, which states ‘new development should respect the scale and character of the surrounding area without being obliged to ape its design’. As such, it is considered part 3.7.1 should be amended to read:</p> <p><i>‘The height, scale, massing and site layout of new housing developments will be based on the <u>should have regard to the immediate context and surrounding housing identified in the Character and Context Analysis</u>’</i></p> <p>Part 3.7.2 bullet point 2 of Policy H5 requires building heights to be generally between 1 and 3 storeys, and 4 storeys in appropriate locations, whilst developments of more than 4 storeys would not normally be acceptable and would need to demonstrate positive benefits. Restricting building heights to 4 storeys does not take account of site specific conditions whereby taller buildings may be suitable whilst still ensuring they relate well to their local context. For example, buildings of up to 5 or 6 storeys towards the centre of the Ham Close estate, falling away to 2/3/4 storeys located closer to the existing surrounding housing would still ensure the local context is taken into account without impacting on the surroundings. Furthermore, the majority of the existing buildings on the Ham Close estate are up to 5 storeys. As such, it is considered this policy should not stipulate building heights and should allow these to be determined on a site by site basis, having regard to local surroundings, and on a design-led approach.</p> <p>In addition, draft Local Plan Policy SA15 (February 2017) allocates the site for redevelopment, and requires the Council to work in cooperation with RHP to develop a Masterplan for the site, setting out the principles and parameters for development. This would include consideration of heights, and would set maximum height parameters suitable for this site based on a design-led approach having regard to the surroundings. It is therefore not considered necessary to stipulate maximum building heights on the site until further design studies have been carried out to ascertain appropriate maximum heights.</p>

ID	Name/Organisation	Section	Response
			<p>Part 3.7.2 bullet point 4 of Policy H5 states single aspect units will not normally be considered acceptable, whilst Standard 29 of the Mayor's Housing Supplementary Planning Document (SPD) (March 2016) requires developments to minimise the number of single aspect dwellings. The standard goes on to state that single aspect dwellings that are north facing, or which contain three or more bedrooms should be avoided. It is considered this standard is sufficient to encourage dual aspect units and minimise single aspect north facing units. Moreover, in some site-specific instances, it is difficult to avoid single aspect units and in some instances single aspect units can still provide a good level of amenity, for example south facing single aspect units.</p> <p>3. Conclusions</p> <p>These representations are submitted to RBR's Ham and Petersham Neighbourhoods Plan consultation by Quod on behalf of RHP.</p> <p>RHP welcomes the allocation of the Ham Close estate within the Neighbourhood Plan, recognising its allocation within the RBR Local Plan and RHP's intentions for redevelopment of the site. These representations set out a number of amendments to the plan, particularly Policy H5, to ensure this does not unnecessarily inhibit forthcoming development of the estate.</p>
16	Indigo Planning on behalf of Beechcroft Developments	Paragraphs: 2.2.4; 9.15.1; 9.16.2; Policies H1 – Residential Development Policy H2 – Housing Mix Policy O6 – St Michael's Convent	<p>We submit these representations to the consultation on the Submission Version of the Ham and Petersham Neighbourhood Plan on behalf of Beechcroft Developments Ltd, the owner of St Michael's Convent, Ham Common.</p> <p>St Michael's Convent is currently vacant, having been declared surplus to requirements by the Sisters of the Church and the women of faith who live alongside them. With St Michael's Convent becoming surplus to the Sisters' requirements, the site has been purchased by Beechcroft Developments. An application for planning permission and listed building consent (LPA Refs. 16/3552/FUL and 16/3553/LBC) for the redevelopment of the site to provide retirement residential units received a resolution to grant permission on 13 December 2017, subject to a section 106 legal agreement which is currently being finalised.</p> <p>We outline below the changes that are necessary to ensure the Neighbourhood Plan</p>

ID	Name/Organisation	Section	Response
		Policy O7 – Previously Development Brownfield Land and Other Small Sites Map 2 Map 8	<p>meets the Basic Conditions.</p> <p>Overarching comments on the Submission Version of the Neighbourhood Plan:</p> <p>The Neighbourhood Plan for Ham and Petersham is an opportunity to develop localised planning policies which protect and enhance the key physical characteristics of the area, whilst also making a meaningful contribution to the unprecedented need for housing in both London and Richmond.</p> <p>The Neighbourhood Plan as currently drafted fails on its second objective of contributing meaningful additional housing, in favour of a policy approach which effectively seeks to maintain the status quo. The London Borough of Richmond upon Thames (LBRuT) and the Greater London Authority (GLA) has a very strong evidence base which demonstrates a significant need for residential accommodation in Richmond.</p> <p>The annual housing target for Richmond of 315 dwellings, as outlined in the London Plan (2016), has increased by over 250% to 811 dwellings per annum in the Draft London Plan (2017). The growth in housing requirements is also evident from the LBRuT Strategic Housing Market Assessment (SHMA), with the target for Richmond increasing from 895-915 dwellings per annum in the June 2016 SHMA to 1,047 in the December 2016 SHMA.</p> <p>Furthermore, there is a considerable need for older persons' accommodation within Richmond. The LBRuT SHMA (December 2016) indicates that a key driver in the local housing market over the coming years is expected to be the growth in the population of older people. The London Plan (2016) recognises this need and indicates an annual requirement for 135 units of specialist housing for older people in Richmond, however this figure has also increased in the Draft London Plan (2017) and now stands at 155 units per annum.</p> <p>The Neighbourhood Plan as currently drafted does not go far enough in facilitating the development of much needed housing within the Neighbourhood Area and helping to achieve the LBRuT housing target.</p>

ID	Name/Organisation	Section	Response
			<p>Paragraph 2.2.4:</p> <p>It is stated that the gardens of St Michaels Convent are designation as Other Open Land of Townscape Importance (OOLTI) within the Local Plan. As a matter of fact, this is incorrect. The OOLTI designation only exists in draft form within the emerging Local Plan, which is still open for public consultation on the proposed Main Modifications.</p> <p>Policy H1 – Residential Development</p> <p>The policy as drafted is overly restrictive, through indicating that housing will only be permitted on sites that are identified within the Neighbourhood Plan or previously developed brownfield sites. The policy prevents residential development coming forward on other sustainable sites within the area that are not identified for housing or brownfield. Policy H1 should be updated to allow for sites to be judged on a case-by-case basis. The Draft London Plan 2017 places a significant reliance on meeting London's housing need on unallocated 'windfall' sites in particular in outer London Boroughs. A neighbourhood plan policy which seeks to prevent such sites making a contribution to meeting the borough's increased housing is not accordance with national planning policy, London Plan polices or those contained in the council's development plan documents. Unless amended to allow development on unallocated sites, policy H1 of the neighbourhood plan would fail to comply with the requirements of NPPG para 065 part e and the need to ensure general conformity with the development plan.</p> <p>Policy H2 – Housing Mix:</p> <p>Objective 3.1 states that older persons' housing will be encouraged, however this is not carried through into any policies of the Neighbourhood Plan. Policy H2 should be updated to reflect the need for older persons' accommodation within the area (please refer to previous comments) and demonstrate support for such residential development.</p> <p>Map 8 – Green Spaces:</p> <p>The approach taken in the preparation of the map and listing of 'green spaces' is inconsistent, as not all large private gardens have been included. For example, the garden of Ormeley Lodge (south west of Green Space 16: Richmond Golf Club) has</p>

ID	Name/Organisation	Section	Response
			<p>not been included in the list, despite having a private garden of an equivalent size to St Michael's Convent. The map therefore fails to accurately map green spaces within the Neighbourhood Area. Furthermore, the green line around the St Michael's Convent site is arbitrarily drawn, it goes further than the draft OOLTI line, which itself remains in draft form in the Emerging Local Plan.</p> <p>In any case, the Neighbourhood Plan does not define 'Private Green Spaces', nor does it appear to have a supporting evidence base. Map 8 is therefore at odds with paragraph 158 of the National Planning Policy Framework (NPPF) (2012), which states that Local Plan policies must be based on adequate, up-to-date and relevant evidence. Map 8 should be updated and all 'Private Green Space' removed.</p> <p>Paragraph 9.15.1:</p> <p>Paragraph 9.15.1 needs updating to reflect the council's decision to grant planning permission and listed building consent (LPA Refs. 16/3552/FUL and 16/3553/LBC) for the residential redevelopment of the site.</p> <p>Policy O6 – St Michael's Convent:</p> <p>Part ii of Policy O6 suggests that the relationship between the 'house' and the gardens gives the site its special character. However, there are several unsympathetic 1950s additions to the original main building of Orford House which detract from the character and setting of the listed buildings on site as noted in the council's report on the above planning and listed building consent application. The policy should therefore be updated to reflect this and state 'buildings', as opposed to 'house', when referring to the buildings on site. Furthermore, Part ii should be updated to reflect the resolution to grant planning permission and listed building consent at the site, which includes the demolition of the 1950s additions to Orford House.</p> <p>It should also be noted that the Map 2 on page 16 mistakenly shows all the coloured buildings on site in purple (which indicates pre-1880s development). This needs correcting to the more limited part of pre 1880 buildings and the remove the addition to the later additions and wings which are considerable in extent.</p>

ID	Name/Organisation	Section	Response
			<p>Part iii of draft Policy O6 seeks to restrict the new buildings and parking to the areas of the site that are already developed and not include any vehicle access points. However, this is not justified as there is no evidence to support the restriction of vehicle access points into the site. Furthermore, all proposals should be judged on their own merits and therefore, in the absence of sufficient evidence, the policy cannot include an in-principle objection to the formation of new vehicle access points at the site. The recent resolution to grant planning permission and listed building consent includes development outside the already developed areas of the site and Part iii of draft Policy O6 therefore cannot restrict such development and should be updated accordingly.</p> <p>Part iv states that any development proposal for the site should secure managed public access to the site. However, St Michael's Convent is privately owned and is not open to the public. There is no public access to St Michael's Convent, nor was there such access when the site was occupied by the Sisters of the Church. Public access was only possible with the permission of the Sisters, for example through open garden days as part of the National Garden Scheme. Draft Policy O6 therefore cannot 'secure managed public access' to the site as it is outside the scope of the policy and this part of the policy should be removed.</p> <p>Draft Policy O6 should be updated to allocate the St Michael's Convent site for residential use. The recent resolution to grant consent for the residential redevelopment of the site has confirmed that this is the most appropriate use of the site and the only serious, viable land use that can support the long-term protection and restoration of the listed buildings.</p> <p>Paragraph 9.16.2:</p> <p>Paragraph 9.16.2 needs updating to reflect the recent resolution to grant planning permission and listed building consent (LPA Refs. 16/3552/FUL and 16/3553/LBC) for the residential redevelopment of the site.</p> <p>Policy O7 – Previously Developed Brownfield Land and Other Small Sites:</p> <p>Similarly to draft Policy H1, this policy is overly restrictive. The policy prevents development from coming forward on sustainable sites that help meet local housing</p>

ID	Name/Organisation	Section	Response
			<p>needs, while remaining in keeping with the local character. In addition, all proposals should be assessed on their own merits and the policy should therefore not restrict all development in backland or open spaces.</p> <p>Furthermore, Policy H2 of the Draft London Plan (2017) outlines the importance of small sites in housing delivery. Part D of Policy H2 states that boroughs should apply a presumption in favour of development of small infill housing developments which provide between one and 25 homes on vacant or underused sites. Table 4.2 of the Draft London Plan (2017) sets a small sites housing delivery target for LBRuT of 634 dwellings per annum.</p> <p>Draft Policy O7 should be updated to reflect the importance of small sites in housing delivery, in accordance with the Draft London Plan, and remove the blanket restriction of development on open or backland spaces.</p>
17	London Borough of Richmond upon Thames	Multiple	See Appendix 1
18	Andrés Muñiz Piniella <i>(Late Representation)</i>	General	I just wish to add that the Ham and Petersham area have one extra facility currently owned by LBRUT in Ham Close called Little House. This building is the home to the community tech innovation hub called Richmond Maker Labs. There, work on blockchain, 3D printing, big data, IoT and other cutting edge tech is being discussed and applied.

London Borough of Richmond upon Thames

Response to Submitted Ham and Petersham Neighbourhood Plan

The Council fully acknowledges the progress made by the Neighbourhood Forum in reaching the submission and publication stages in the Neighbourhood Plan's development. It is generally supportive of the submitted Plan and appreciates all the work invested in this process by those involved. The following response is intended to assist in progressing the Plan through examination and towards referendum, and to ensure that the Plan meets the basic conditions which are that the Neighbourhood Plan:

- 1) Has regard to national policies and advice
- 2) Contributes to the achievement of sustainable development
- 3) Is in general conformity with the strategic policies contained within the Development Plan for the area (this includes the London Plan and Local Plan)
- 4) Does not breach and is otherwise compatible with EU Obligations
- 5) Meets and complies with the prescribed conditions/matters (for example, ensuring that the Plan is not likely to have significant effects on a European designated site)

It is anticipated that the Neighbourhood Plan will become part of the Development Plan for the area. The community will have a reasonable expectation that the Council will generally determine all planning applications in the area on the basis of the Local Plan and Neighbourhood Plan policies. In this context the Council equally expects the formulation of a Neighbourhood Plan that is capable of interpretation through the normal planning processes on a day-to-day basis. The responses below suggest a number of ways in which further clarity can be achieved within the Plan and its policies.

Section of Plan	LBRuT Representation/Comments	Suggested modifications to the Neighbourhood Plan
Consultation Statement	The statement clearly sets out a thorough and well documented consultation process. However, it is important that any modifications that have subsequently been made to the Neighbourhood Plan as a result of comments received during its development are clearly set out within the Consultation Statement. This includes the comments and input received from the borough Council.	Include relevant amendments to the Neighbourhood Plan within the body of the Consultation Statement.

Appendix 1 – London Borough of Richmond upon Thames Representation

Section of Plan	LBRuT Representation/Comments	Suggested modifications to the Neighbourhood Plan
Strategic Environmental Assessment (SEA) and HRA Screening	<p>The Neighbourhood Forum has carried out a SEA and HRA Screening and concluded that neither is required. The Statutory Consultation bodies – Natural England, Historic England and Environment Agency have also been consulted.</p> <p>The three statutory bodies with environmental responsibilities and the Council have agreed the conclusions of this assessment, that a SEA is not required.</p>	<p>It is considered that the SEA and HRA screening processes undertaken ensure that the Neighbourhood Plan complies with Basic Conditions No's 4 and 5 as set out above.</p>
Policies in general	<p>It is important that the Neighbourhood plan policies are consistent in approach. The policies as currently worded are not consistent and do read as if they have been written by different people using different styles. The way the policies are identified and numbered does not help the user clearly identify the policies.</p>	<p>Review policy style and formatting of the Neighbourhood Plan.</p> <p>There needs to be a clear distinction between what actual policy is and what is context or justification. The most important element of the Plan is the policies and these should stand out clearly from the rest of the supporting text. For example, policies could be distinguished by placing them in easy identifiable text boxes.</p> <p>The vision, aims and objectives should be positioned immediately before the policies in the plan to ensure that a clear link can be seen between these and the policies, as well as to the outcomes of the consultation process.</p>
Page 12 – Section 1.1 Vision and Objectives	<p>With the suggested rearrangement of the Plan's structure (as above), it is considered that there is a clear connection between the priorities established through the consultation, the vision, objectives and the content of the policies.</p>	
Page 18 – 1.8. Residents – Paragraph 1.8.6	<p>This paragraph makes no reference to housing new families and instead only focuses on meeting the needs of existing residents. This view is too narrow and should be amended.</p>	<p>Amend the paragraph wording as follows:</p> <p>“1.8.6 The Neighbourhood Plan seeks to ensure</p>

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		that new housing meets the needs of <u>current and future</u> residents in the area.”
Page 24 – Policy C1 – Protecting Green Character	This reads more like a statement than clear policy.	The Policy wording requires further clarification to ensure that it will assist with the determination of planning applications.
Page 25 – Policy C2 – Character and Context Appraisals	As worded this policy is rather inflexible as it states “All applications for new buildings <u>must be</u> accompanied by a Character and Context Appraisal ...”	Amend the policy wording as follows: “2.4.1 All applications for new buildings <u>must be accompanied by</u> <u>are encouraged to include</u> a Character and Context appraisal which addresses the key elements of the character of the designated Conservation Area or neighbourhood character area in which the site is located.”
Page 25 – Policy C3 – Protecting the Character of Built Areas	As currently worded this policy is also considered to be rather inflexible.	Amend the policy wording as follows: “2.5.1 New developments should, <u>where possible</u> , retain and add to the neighbourhood’s network of paths and through routes and maintain the open and permeable structure of the area.”
Page 26 – Figure 2.1 – Conservation Areas and Listed Buildings	Due to the hierarchy of GIS information on this map, it is quite difficult to read. The map is intended to primarily depict the conservation areas and listed buildings, so these should take precedence over green/open spaces. The latter will still be clearly legible from the absence of buildings.	Consider using different colours to identify each conservation area separately, and rearranging the hierarchy of the map’s GIS layers so that the conservation areas are shown ‘above’ the green/open space. As it is presently organised, the green colouring overlaying the conservation areas make these difficult to decipher.
Page 27 – Figure 2.2 – Character Areas	Although a minor point, the boundary of the Thames policy area obscures the boundaries of the Locksmeade character area (8).	Rearrange the GIS layer hierarchy to clarify the boundary of Locksmeade character area (see, for example, the map on page 101).
Page 28 – Figure 2.3 –	As with Figure 2.1, this map is rather difficult to read.	See comments above for Figure 2.1 on page 26.

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Archaeological Priority Areas	There also appears to be a minor cartographical area in the boundaries of the APA to c.200m north of Meadland Drive.	Fix error on the boundaries of the APA.
Page 32 – 3 Housing – Paragraph 3.2.5	<p>In the final paragraph, it is noted that “However, in Ham and Petersham neighbourhood area a strategic balance in the region of 20% affordable housing of the total housing stock should be sought, in order to deliver a range of housing options and ensure the community remains mixed”.</p> <p>While the Council supports the Forum’s aspiration to encourage affordable housing and maintain a mixed community, it should be noted that Publication Local Plan Policy LP 36 on site specific applications requires that 50% of all <u>new</u> housing units will be affordable housing.</p>	
Page 33 – Policy H1 Residential Development	It is considered that the reasoned justification should set out the evidence to support this policy.	The policy should include the sites that would deliver such schemes in order to be effective.
Page 33 – Policy H2 – Housing mix	The policy as currently worded does not add a local element above the requirements of the Local Plan. It is not necessary to repeat Local Planning policy, however if this policy is retained it should be clarified that there is not a requirement for on-site provision of affordable housing for developments of less than 10 dwellings (see para 3.5.2).	<p>In paragraph 3.5.2, it should be clarified that “it will be necessary for new affordable housing to be included on the sites identified for housing development <u>in line with the requirements of Local Plan policy LP 36.</u>”</p> <p>This is to ensure ‘general conformity’ with the conditions of this Local Plan policy, which does not require the provision of affordable housing on-site for developments of less than 10 units.</p>
Page 33 – Policy H3 – Affordable Housing	Whilst the encouragement of affordable housing provision within the Neighbourhood Plan area is welcomed, it is not apparent whether Policy H3 adds anything to existing Local Plan Policy.	
Page 34 – Policy H5 – Design principles for housing	The Council considers that this policy introduces tighter controls than exist in both the London Plan and the Local Plan. It is important	It should be acknowledged in paragraph 3.7.2, bullet point 2, that Ham Close also already has

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development	that robust evidence is set out within the supporting text to support the need for this tighter control within the area. There are specific concerns relating to building heights and the landscaping and planting strategy. Such requirements could potentially affect the viability or deliverability of sites.	building heights of 5 storeys.
Page 39 – Policy T1 – Travel Plans	The Council has previously raised concerns with regard to the requirements of Policy T1, which are considered to be more onerous than those contained within the London Plan and Local Plan. Travel Plans for small residential schemes of 10 units or just over would very likely not achieve much in terms of mode shift to sustainable transport.	<p>Amend the policy wording as follows:</p> <p><u>“4.3 Policy T1 – Travel Plans- Assessment of transport impact”</u></p> <p>4.3.1 Housing developments of more than 10 units will be required to:</p> <ol style="list-style-type: none"> 1. <u>Assess the transport impact of the proposal</u> Undertake a transport assessment and where <u>necessary submit a</u> Travel Plan, which should be produced in accordance with TfL best practice. The assessment and plan should make sustainable and implementable proposals for mitigating the transport impacts of the development to take account of the generally low PTAL values in the area. The proposed measures must be implemented prior to occupation of the development or within an agreed timeframe. 2. <u>Where appropriate</u>, provide off street spaces for car club vehicles.”
Page 40 – Policy T2 – Improvements to Transport	This does not read as a policy but rather a list of community aspirations/projects. Specific deliverable schemes are not listed or	The plans and figures on pages 42 and 43 of the Plan should be clearly summarised in the

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Infrastructure	supported by robust evidence. It should be noted that feasibility studies have yet to be undertaken in relation to these projects and that there is no funding in place to look at options and feasibility.	reasoned justification of the policy.
Page 40 – Policy T3 – Motor Vehicle and Cycle Storage	The Council has previously raised concern over the cycle parking standards contained within this policy which are higher than the Council's approach in Publication Local Plan Policy LP45 which is as per the London Plan standards. It is reiterated that without adequate robust evidence to support these stringent requirements then it is considered that this policy does not meet the basic conditions as set out at No 3 above which states, "It is in general conformity with the strategic policies contained within the Development Plan for the area (this includes the London Plan and Local Plan)".	
Page 45 – Figure 4.4 – Walk London Network – Capital Ring and the Thames Path	The blue line depicting the Thames Path is erroneously labelled on the key as the Capital Ring.	Amend the incorrect label to 'Thames Path'.
Page 50 – Figure 5.1 – Community Facilities	<p>St. Richards Church of England Church is only depicted as a school building. It would also be beneficial to provide further clarity regarding the 'Miscellaneous' category, if this can be done without adding too much text.</p> <p>The scale bar on the map, while legible, appears to have been cut off.</p>	<p>Amend the map so that both the Church and the School are identified as community uses at St Richards Church.</p> <p>Add a footnote to clarify what is included in the 'Miscellaneous' category of community facilities, or otherwise identify what the uses of these sites are (assuming this can be done simply).</p> <p>Ensure that the scale bar is correctly shown.</p>
Page 53 – Policy R1 - Enhancing Retail Uses	The second part of this policy, which seeks to resist the loss of commercial premises in the area, needs to be accompanied by criteria to assist in the determination of planning applications.	Include criteria within the policy to help define what constitutes "reasonable efforts". For example the length and requirements of the marketing period.
Page 56 – Policy R2 – Other	The second part of this policy, which states "Facilities and services	Include criteria within the policy which help to

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Businesses and Local Services	such as shared work-space and serviced offices which would encourage and sustain small businesses will be supported where they do not conflict with planning policies” needs to be accompanied by criteria to assist in the determination of planning applications.	define “conflict with planning policies.”
Page 59 – Policy G1 – Open Spaces	<p>As currently worded the intentions of this policy are not clear. The National Planning Policy Framework (NPPF) clearly sets out how proposals which impact on Local Green space should be determined.</p> <p>The latter part of the policy, concerning the “site specific management plans” does not function as a land use policy within the context of the Neighbourhood Plan. It is considered that this would be better included as part of the policy application section.</p>	<p>To be implementable this Policy needs to list those green spaces within Ham and Petersham that are intended for conservation and enhancement and these should also be identified on the policies map (see comments on Figure 7.1 on Page 63, below).</p> <p>The reference to site specific management plans would be better included as part of the policy application section, rather than within the policy itself.</p>
Page 60 – Policy G3 – Allotment Extension and Community Orchard	The Council considers that this is more of an aspirational project than a specific implementable policy.	
Page 63 – Figure 7.1 Green Spaces	<p>Several of the public and private green spaces included in the numbered key are not identified on the map.</p> <p>These include: 5, 6, 7, 8, 9, 10, 12, 13 and 14.</p>	Correct the map to show missing numbers.
Page 67 – Policy E5 Sustainable Drainage	It is not clear what this policy adds to existing policy and controls contained within National Policy; the London Plan; the Local Plan and associated Supplementary Planning Guidance. If it is to be retained it is considered that some flexibility should be incorporated to ensure it is in general conformity.	<p>Amend the policy wording as follows:</p> <p>“8.8 Policy E5 Sustainable Drainage (SuDs) 8.8.1 All new buildings will be expected <u>where possible</u> to include a sustainable drainage system to dispose of surface water. All sustainable drainage systems must be integrated into the landscape and have a maintenance programme.”</p>

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Pages 73 – 87 – Section 9 – Opportunities for Change	<p>The Council considers that many of the site specific policies within this section are currently aspirational projects (with the exception of Cassel Hospital and St Michaels Convent which are site specific policies within the Publication Local Plan), rather than specific implementable policies.</p> <p>It is also considered that it would be helpful to include a map for all sites.</p>	Include maps for all sites.
Page 80 – 9.8 Central Ham	<p>In paragraph 9.8.6 it is noted that GP practices do not typically provide a full range of local health and wellbeing services, and that the Council cannot exercise control over GP practices. In this context, it is considered that the inclusion of this sentence is not implementable.</p>	
Page 81 – Policy O4a – Ham Close	<p>The Council is concerned that paragraph 9.9.5 is unduly prescriptive in seeking the replacement of existing community facilities. The clustering of facilities is dependent on the changing demographic of health/community needs as well as input from NHS Trust.</p>	
Page 82 – Policy O4d – Ashburnham Road / Ham Street / Wiggins Lane / Woodville Road	<p>The Council considers that the wording of paragraph 9.12.2 could place an unreasonable/unexpected financial burden on the viability of any development coming forward on Ham Close.</p>	<p>Amend the policy wording as follows:</p> <p><i>"9.12.2 The public highway is the responsibility of LBRuT. If redevelopment of Ham Close is forthcoming, the opportunity should be taken to secure a wider package of environmental improvements. Priority would be given to a scheme for improvements, particularly to Ashburnham Road / Ham Street / Wiggins Lane / Woodville Road, should be assessed within the viability options."</i></p>
Page 84 – Policy O5 – Cassel Hospital	<p>This policy includes references that the re-use of the site "could include affordable residential development with some supported housing for older people and / or community uses" (paragraph</p>	<p>The reasoned justification to Policy O5 should include reference to the specific need for affordable older persons' housing within the area.</p>

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	<p>9.14.1, bullet point v) and “residential use including affordable older persons’ housing” (paragraph 9.14.3).</p> <p>It should be noted that Publication Local Plan Policy SA 16 (Cassel Hospital) refers to the potential use of the site for a “residential led scheme with affordable housing.” Whilst this does not preclude the delivery of older persons’ housing on the site, it does not include a specific policy requirement for it.</p> <p>If the Neighbourhood Plan is proposing the delivery of affordable older persons’ housing on this specific site, then it needs to justify this through evidence for the specific need in this area within the reasoned justification to the policy.</p>	
Page 88 – Policy O7 Previously developed brownfield land and other small sites	As it is currently worded this policy is not considered to be implementable as it is very general.	This policy requires rewording and could usefully incorporate some of the wording included at paragraph 9.18.3 of the reasoned justification.
Pages 93 – 100 – Appendix 3 – Implementation Programme	<p>It is noted that a number of the proposals identified in the implementation programme set unrealistic timescales.</p> <p>Character and Heritage:</p> <ul style="list-style-type: none"> • The first proposal should be listed as ‘ongoing’. <p>Travel and Streets:</p> <ul style="list-style-type: none"> • The first three proposals, while desirable, require funding and permissions which make these more likely to be completed over a ‘medium’ rather than a ‘short’ timescale. <p>Under the second proposal for ‘Environmental Sustainability’, there may be occasions where there is a good case for the use of traditional materials, which may be laid to drain to soft ground.</p>	<p>Amend the timescales as proposed.</p> <p>Under the second proposal for ‘Environmental Sustainability’, amend the wording as follows:</p> <p>“All new hardstandings and forecourt parking areas to be constructed using permeable materials or sustainable drainage arrangements.”</p>
Page 101 – Character Area Studies map	The map should include a Figure number and title. It would be helpful to include the key on the same page (as with other maps in the Plan), rather than on the following page.	Amend the map as proposed.