

HAM AND PETERSHAM NEIGHBOURHOOD FORUM
HAM AND PETERSHAM NEIGHBOURHOOD PLAN
RESPONSES TO THE PRE – SUBMISSION CONSULTATION

Ref No.	Name /Organisation	Summary of response received	Neighbourhood Forum Response
Vision and Objectives			
1.	Richmond Clinical Commissioning Group (CCG). Responding on behalf of the RCCG, NHS England (NHSE), NHS London Healthy Urban Development Unit (HUDU) and NHS Property Services (NHS PS).	Neither agree or disagree with Vision	Noted
2.	Richmond Housing Partnership (RHP)	Agree with the Vision	Noted
3.	Richmond Housing Partnership (RHP)	Para 1.8.6 This makes no reference to housing new residents and families, only meeting the needs of existing residents.	<p>We have understood this comment to be about increasing the housing stock in the neighbourhood area rather than the turnover of the existing stock.</p> <p>The Context section in the Housing chapter (3.2) sets out the constraints governing the scope for new development which are amplified in respect of individual sites in the Opportunities for Change chapter.</p> <p>Suggested revision; ‘The Neighbourhood Plan seeks to ensure that new housing meets the needs of <i>current and future</i> residents in the area</p>

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4.	Ham Riverside Lands Ltd (HRLL)	The Vision statement is bland and question the description 'semi-rural'	<p>The Vision statement has been rephrased to give it a more positive tone and explanatory paragraphs added.</p> <p>The phrase 'semi-rural' reflects the open space setting of the settlements which a distinctive feature of the character of the neighbourhood and figured prominently in views expressed in the consultation.</p>
5.	Indigo Planning Ltd on behalf of Beechcroft Developments Ltd.	<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. Clearly much of Ham and Petersham has an extremely pleasant character and townscape which rightly should be protected. However, this protection should not prevent new development coming forward which is of a high design quality, consistent with the character of the area which can also improve the setting of the important local buildings and rectify the mistakes of the past. As currently drafted, the Neighbourhood Plan misses that opportunity. The London Borough of Richmond upon Thames (LBRuT) and the Greater London Authority (GLA) has a very strong evidence base which demonstrates a strong need for residential accommodation in Richmond. In fact, the housing target for Richmond has further increased from 895-915 dwellings per annum in the London Borough of Richmond upon Thames Draft Strategic Housing Market Assessment (SHMA) (June 2016), to 1,047 dwellings per annum in the London Borough of Richmond upon Thames SHMA (December 2016).</p> <p>Furthermore, there is a considerable need for older</p>	<p>Sites for additional housing have been identified in the context of the emerging Richmond Local Plan which together with the Borough's Strategic Housing Market Assessment do not identify Ham and Petersham as areas which will make a significant contribution to meeting the need for additional housing. The second objective at 1.1.5 does not therefore seek to contribute 'meaningful additional housing' as suggested.</p> <p>The support for recognising the need for older persons accommodation is noted and welcomed.</p>

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		<p>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. At Beechcroft's consultation events in 2016, it was extremely clear that a number of local people are looking to downsize in Ham. Importantly, the government's recent White Paper also confirms the need to provide housing for those down-sizing, which in turn frees up larger family houses.</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>	
6.	Indigo Planning on behalf of Beechcroft Developments Ltd	Map 2 Historical Development – shows all buildings on St Michael's Convent site as pre1880's which is incorrect.	Map has been revised The map is really intended to show the general phases of development of Ham and Petersham, rather than the age of each individual building. The site as a whole, including the garden, is pre-1880s development, so it depends on approach as to whether development sites are taken as a whole, or only buildings are identified.
7.	Historic England	Historic England welcomes the creation of this Plan ... Given the fundamental contribution that the historic environment makes to the character of the neighbourhood area, we welcome the aims of the plan, notably in relation to design, green spaces and heritage and local centres, with the enhancement of local character being a unifying theme. This is clearly set out the vision paragraphs 1.1.2 and 1.1.4.	Noted
8.	Historic England	The historical development of the area is well	Noted – add registered landscapes & archaeological priority

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		covered, as is the location of listed buildings, locally listed buildings and conservation areas in map 3, which appears to be in line with mapping used by the local planning authority. We would recommend adding the registered landscapes to this map, which should help you better meet the objectives in section 7 of the Plan, and make reference to the archaeological priority areas that cover much of the area	areas to map
9.	Transport for London (TfL)	In summary, the inclusion of policies within the Neighbourhood Plan that seek to increase sustainable travel and improve the public transport, walking and cycling infrastructure are supported by TfL. TfL welcome further discussions specifically with regards to improvements to the bus network in this area.	Noted
10	Jane and Ray Morrison	Agree with the Vision	Noted
11	Martingales Close Residents' Association	Strongly agree with Vision	Noted
12	Martingales Close Residents' Association	1.16 Green Spaces. We support the objective as it will deliver the vision of retaining the semi rural character of the area	Noted
13	Martingales Close Residents' Association	1.14 Character and Heritage We support the objective in its attempt to make sure development should enhance the character of the area	Noted
14	Richard Woolf and Fiona McDaniel	1.6.9. We believe that Wates was not the builder at Parkleys, but that it was constructed by Span Developments Ltd.	Records indicate that the Estate was built by Wates
15	Richard Woolf and Fiona McDaniel	1.6.10. Ham and Petersham has a tradition of unique, one off, world class architecture both historic and contemporary. Note should be made of other high quality	Noted. An additional sentence has been added to para 1.6.8.

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		C20 and C21st architectural schemes by renowned architects [list provided]	
16	Kathleen Massey	Agree with Vision and comments 'Totally in agreement – retaining Ham's unique "village-like" identity is of the utmost importance'	Noted
17	Kathleen Massey	1.1.4. A KEY OBJECTIVE is To retain the special and unique character by ensuring all development enhances the character & appearance of the area and is designed to integrate with existing architecture and green spaces eg Ham Common & Ham House conservation areas – Essential in the development of St Michael's Convent & Gardens.	Noted
18	Kathleen Massey	Protection and enhancement of green spaces and sites of historical and environmental significance are absolutely essential in the 4 specified conservation areas covered by the Neighbourhood Plan	Noted
19	Kathleen Massey	It is of prime importance to ensure the viability and vibrant atmosphere of our shopping areas, especially Ham Parade. Quality and diversity of shopping facilities has drastically reduced since, in recent years, we have lost a post office, two banks, a quality fruiterer & greengrocer, a butcher and other important shops, only to have them replaced by an excess of estate agents, betting offices and coffee shops. We need to bring relevant businesses back to the parade and make it a centre of community life, thus enhancing this commercial area of our environment.	Noted
20	Kathleen Massey	Safe Cycling should be encouraged around and through Ham Parade, where the road is highly dangerous. Cycling on the pavements is undesirable but it takes place because the parade has so much fast through traffic.	Noted – to be taken into account in developing detailed proposals for Ham Parade.

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21	Michael Burgess	In broad agreement with the vision and objectives of the plan subject to comments included in following sections	Noted
22	Michael Burgess	<p>Conclusion</p> <p>The neighbourhood plan is excellent in many respects and covers a lot of ground. However, whether by accident or design, it fails to address the single biggest problem in Ham namely access and transport. The talk about cycling and walking is laudable but skirts the real issue. It is simply unrealistic to believe that new developments will come up with mitigating plans to offset the additional cars they will bring. Each and every development at Grey Court School has been accompanied by a so-called “transport plan” which achieved little or nothing other than a promise to try and encourage staff and pupils not to use their cars. The reality is that the majority of teachers still drive to work and vast numbers of their pupils are driven to school by car. Likewise, there is absolutely no mention of Ham Street in the plan despite the fact that it is almost the definitive centre of Ham and the road that most characterises the area. At the very least there should be some consideration of what to do about the traffic - whether it be closed to through traffic or made one way it is hard to say but something needs to be done. Ignoring the problem is not an option. As a resident of Ham Street I should perhaps declare an interest but I believe that any improvement would be for the benefit of the community as a whole</p>	<p>We acknowledge that Ham Street is congested with parking and as a result can be difficult to negotiate. Reference to this has been added to the Plan (para 4.2.3).</p> <p>Widening the main road to Richmond through Petersham to increase capacity is impractical and undesirable on heritage grounds. The plan therefore proposes to make walking and cycling more attractive as alternatives to the car by developing a network of cycle / footpaths including a new link across the River to Twickenham to complement the bridge at Teddington Lock. Improvements which support the reliability and variability of bus services are also to be prioritised (para 4.4). Other measures include encouraging car clubs setting lower requirements for parking provision in new housing developments. However, it is acknowledged that achieving this change will be challenging.</p>
23	Daniel Hearsom, Pembroke Lodge	Re. 1.1.8 strongly support as community facilities have been underfunded	Noted

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24	Mark Wing, Radnor Bridge project	Re.1.1.7 Keen to register interest in discussing the bridge project and enabling Forum to deliver vision to improve connectivity (See PDF form)	Noted. The feasibility study proposed in the Implementation Programme (Appendix 3) will include consideration of locations.
25	Elizabeth Lodh	Protecting green and open spaces is very important	Noted

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Character and Heritage			
1.	Richmond Housing Partnership (RHP)	2.6.1 & 2.6.2 Policy C4 Routes. These should also allow for the re-provision ('lift and shift') of routes if retention of existing is detrimental to a new scheme's design or prevents improvements to permeability, accessibility and linkages.	It is acknowledged that Ham Close is currently exceptionally permeable. An additional sentence has been added to para 9.9.1 noting this and that more privacy for residents is likely to reduce permeability whilst retaining routes through the site.
2.	Historic England	We note that policy C2 requires all applications for new buildings to be accompanied by a Character and Context appraisal which addresses local character, while paragraphs 2.2.7-2.2.10 highlight that several of the local authority's character studies for the area are now in need of updating. We would therefore draw your attention to the different place assessment tool kits that you may want to consider to looking at to expand on the character studies in the appendix, notably the Place Check and Oxford character assessment toolkit , as well as our publication Understanding Place Historic Area Assessments: Principles and Practice .	Noted
3.	Historic England	In relation to policy C4, where you highlight the local importance of the neighbourhood's paths and through routes, we would encourage you to illustrate these on a map. This is on the presumption that they are in addition to those	Noted – maps have been revised.

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		illustrated on map 5. By illustrating these routes it will make it easier for developers to comply with this policy, and it may be a useful tool for understanding the significance of the elements of the landscape.	
4.	Transport for London (TfL)	Policy C4 with regards to pedestrian and cycle routes is supported. With respect to London Plan policy 6.10 reference should be made to the strategic walking routes within this area – The Thames Path and the Capital Ring. Opportunities to enhance these routes would be welcomed. This should reflect the Mayors aspirations for Healthy Streets in his 'A City for All Londoners' document.	Thames Path and Capital Ring routes have been included in Map 5 Opportunities to enhance the routes will be pursued with TfL
5.	Martingales Close Residents' Association	2.3.1 Essential to the character of the area, as evidenced in the Ham Common Conservation area description, are views into and out of the conservation area.	Noted
6.	Martingales Close Residents' Association	Chapter 2 We are concerned that more protection should be given to the conservation area and in particular to the pressures that are placed on them such as pressure to build on the gardens of the conservation areas and potential damage to views into and out of the conservation areas.	This issue should be addressed in the proposed reviews of conservation area appraisals and management plans (para 2.2.10)
7.	Martingales Close Residents' Association	2.2.4 Although the Convent is currently only proposed as an OOLTI we agree with the importance it plays in contributing to the local character of the area and the essential . The site clearly meets the requirements to be an OOLTI as defined by the policy. Evidence of the importance this local green space gives to the neighbourhood is evidenced by the enormous support given to the proposal by local people. This is an	Noted

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		essential piece of local green space that has been rightly highlighted in this policy and on the maps.	
8.	Richard Woolf and Fiona McDaniel	2.3. Protecting the Green Character. There is no mention of light pollution eg at German School and Russell School. Light pollution would have a severe and detrimental effect on the rural character of the area.	Accepted. Add to 2.3.1 <i>'The visibility of internal and external lighting when viewed from the open spaces requires particular care in line with Policy G2 Light Pollution (para 7.4.1)'</i>
9.	Richard Woolf and Fiona McDaniel	2.3 The importance of walls (many of brick) fences and posts particularly facing roads and public areas cannot be underestimated.	Agreed. Many of these are identified in the Character Appraisals (Appendix 4)
10.	Richard Woolf and Fiona McDaniel	2.3 Certain developments have open front gardens which are being enclosed and which should be resisted to retain the open feel. Concrete eagles and ball cappings on the top of walls should be avoided at all costs!	Agreed
11.	Richard Woolf and Fiona McDaniel	2.4 Character and Context Appraisals. A Design and Access Statement is required by LBRUT for all major developments listed building applications and developments within a conservation area. In addition, a heritage statement is also required by LBRUT for listed building applications and developments within a conservation area to describe the significance of any heritage asset affected and any contribution made by their setting. The requirement for an additional character and appraisal seems to be unnecessary and a duplication of requirements.	The concern underlying this comment is accepted and Para 2.4.3 has been expanded to enable the Character and Context Appraisal to be incorporated into the Heritage Statement and Design and Access Statement. The Plan seeks to ensure new buildings not in Conservation Areas are appropriate to their context and enhance the character of the neighbourhood. It is now stated explicitly that the Appraisals should be appropriate to the size of the development to avoid onerous requirements.
12.	Richard Woolf and Fiona McDaniel	2.6.1 We strongly agree that there should be no gated developments.	Noted
13.	Kathleen Massey	2.1 TOTALLY SUPPORT THIS OBJECTIVE	Noted
14.	Kathleen Massey	2.2.2 TOTALLY SUPPORT THIS OBJECTIVE re fostering the character & heritage of HAM.	Noted
15.	Kathleen Massey	The OOLTI designation of the key areas mentioned is	Noted

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		essential to provide control over development and protection against the intensification of the built-up area – already suffering from hazardous parking eg around Ham Common and causing degradation of this very special and ‘village-like’ location so highly valued by local residents.	
16.	Kathleen Massey	2.3.1. Crucial to protecting the Green Character is maintaining the distinction between the built-up area and green spaces of Ham & Petersham as identified in map 4	Noted
17.	Kathleen Massey	2.3.3 / 2.3.5 & 2.3.6 [agree that] Signs, fencing and lighting etc should be fitting for the open ‘semi rural’ character	Noted
18.	Michael Burgess	<p>1.1.4 Character and Heritage</p> <p>Although the plan talks about development and housing it says little or nothing about the existing infrastructure. No mention is made of how to improve or enhance the built environment of many of the streets and roads in Ham and Petersham. Throughout the plan there are references to the village like atmosphere and yet not a single mention of Ham Street and almost no reference to Ham common and the surrounding roads. Without these there would be no village and no village atmosphere. Ham would simply be a large housing estate.</p> <p>It is therefore disappointing that the neighbourhood plan has little or nothing to say about enhancing these areas for the benefit of both the residents and the surrounding community.</p>	<p>When the Conservation Area Management Plans are reviewed (2.2.10) the opportunity will be taken to bring forward enhancement schemes for areas such as Ham Street.</p> <p>Detailed Management Plans for the main open spaces including Ham Common are proposed (7.3.2) which will include conservation and improvements proposals.</p> <p>It must be acknowledged however that further reductions in Government expenditure will restrict the scope for such schemes.</p>
19.	Michael Burgess	2.0 Character and heritage	

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		Map 4 on page 25 and paragraph 2.3.1 on page 27 The orange boundary marking the edge of the built-up area appears incorrectly to include the playing fields to the east and south of Grey Court School which are classified as Metropolitan open land. This should not be classified as suitable for development. See the area shaded blue in the plan [provided].	This map has been withdrawn from the draft Plan

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Housing			
1.	Richmond Housing Partnership (RHP)	3.7.1 These densities are lower than within the current Ham Close proposals on which consultation was based in autumn 2016. We understand that LBRuT has provided the forum with the figures and would ask that the proposed densities for this scheme are acknowledged.	Para 9.8.2 has been amended to acknowledge that the scheme being discussed is at a higher density than the existing estate. 3.7.1 has been revised as follows <i>The, height, scale, massing and site layout of new housing development will be based on the immediate context and surrounding housing identified in the Character and Context Appraisals. The density of new housing development in Ham and Petersham may exceed 200 habitable rooms per hectare (hrh) only in exceptional circumstances where it can be demonstrated that the scheme complies with all the policies of the Neighbourhood Plan.,</i> See policy 04a i)
2.	Richmond Housing Partnership (RHP)	3.7.2.2 This states that more than four storeys will not normally be considered acceptable but Ham Close existing block heights are up to five storeys and the proposals on which consultation was based in autumn 2016 included some set back sixth storeys to blocks within the middle of the development. We would	This paragraph is in conformity with the publication version of the Local Plan, particularly policy LP 1 & 2 and in particular paras 4.2.6 & 4.2.7. The paragraph now reads <i>building heights generally between 1 and 3 storeys, and 4 storeys in appropriate locations. Developments of more</i>

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		request, given the existing Ham Close blocks are very different to the rest of Ham in layout and height, that these proposals are acknowledged.	<i>than 4 storeys will not be normally be considered acceptable and will need to demonstrate positive benefits in terms of the townscape and local aesthetic quality and relate well to their local context,</i> Reference to the current proposals being developed for Ham Close will be included in section 9.8 on Central Ham.
3.	Richmond Housing Partnership (RHP)	3.7.2.7 This states that all units should be dual aspect but this can be very difficult for one bedroom units within a block's design. The London Plan gives guidance that one bedroom flats can be single aspect but if so they should not be north-facing. We'd ask that the London Plan requirements are acknowledged in the Neighbourhood Plan.	The Council suggests that this criterion should refer to 'normally' to allow for single aspect units in appropriate situations e.g. south facing aspect, and this has been accepted. For a home fit for the future dual aspect is an important requirement. Single aspect flats are difficult to naturally ventilate and more likely to overheat, an increasing concern for homes in London due to anticipated temperature increases from climate change.
4.	Indigo Planning on behalf of Beechcroft Developments Ltd	H1 Residential Development. Restricting development to sites identified in NP and Brown Field Sites is overly restrictive – should be judged on site by site basis.	A purpose of the Neighbourhood Plan is to identify sites in the area which are suitable for housing development rather than relying on an opportunistic site by site approach. The Plan acknowledges that further opportunities for housing development may arise on brownfield land and para 9.17.2 refers to the possibility that small sites may be brought forward.
5.	Indigo Planning on behalf of Beechcroft Developments Ltd	H2 Housing Mix. 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 above) and demonstrate support for such residential	Policy H4 (Housing Standards) encourages all new housing to meet Building Regulation M Category 2 (accessible and adaptable homes suitable for universal use including elderly) Policy H2 has been amended to read ' <i>All housing developments will be encouraged to include a range of</i>

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		<p>development.</p> <p>In addition, Policy H2 as drafted is overly prescriptive through suggesting that all residential developments over 10 units must include a mix of 1, 2 and 3 bedroom homes and those of over 20 units should include some 4 bed properties. The unit mix of developments should be judged on a site-by-site basis and should be responsive to local context and requirements. Policy H2 should therefore state that the housing mix of developments should be appropriate to their location, as set out in Policy DM HO 4: Housing Mix and Standards of the LBRuT Development Management Plan (2011).</p>	<p><i>units sizes in accordance with LP 35 of the Richmond Local Plan.'</i></p>
6.	Martingales Close Residents' Association	H1 We support the balance and control this gives local people to over what sites should be developed.	Noted
7.	Kathleen Massey	3.6 Policy 4 Housing standards for the area should be adhered to as outlined	Noted
8.	Kathleen Massey	<p>4.3 POLICY T1 – Travel plans look appropriate for the area</p> <p>4.4 POLICY T2 – Am in agreement with the improvements outlined</p>	Noted
9.	Michael Burgess	<p>4.3.1 Housing developments</p> <p>the plan proposes that “Housing developments of more than 10 units to include an implementable and sustainable travel plan setting out how the transport impacts of the development will be mitigated”.</p> <p>Although a laudable sentiment this flies in the face of reality.</p> <p>The plan makes gives no indication of how the impact of such development can be mitigated or if, indeed, it is actually possible. What is also perfectly certain is</p>	<p>The preparation of a travel plan will enable the transport issues relating to an individual site to be identified and taken into account in assessing a planning application in a transparent and open manner.</p>

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		that RHP and the council will, if they put forward plans to redevelop Ham Close, simply fudge the issue by talking about encouraging people to walk and cycle.	
10.	Marco	<p>Following your article in the Ham and Petersham magazine delivered through my door this morning I would like to make it clear that as an actual resident of Ham Close, unlike yourself, I together with a large of actual residents are pro development.</p> <p>The conditions which we have have been forced to live in for a number of years, damp, poor insolation and general dilapidation have reached a boiling point.</p> <p>I ask that you take you scare tactics elsewhere and leave this issue to the people it will actually affect, the residents of ham close and to a certain degree the wider community of Ham - although this is debatable and refrain from further hindering the project Ham Close Residents want.</p> <p>Within the magazine you have also laid out a separate plan regarding your organisations long term goal including more affordable housing for the area, this is what Ham Close will provide and there are many of us who live here who no longer want it live in sun standard conditions with damp and poor insulation.</p> <p>Please ensure that these, pro development comments are added to your consultation together with the silent majority who are also pro change.</p> <p>RHP have developed a new plan which has taken into account the concerns of residents and I, together with actual residents in Ham close are happy with these. There will be surveys on transport, doc surgery etc so you do not need to worry as this will all be taken into account.</p>	Noted

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		<p>Please do not interfere in matters concerning residents who live at Ham Close in sub standard conditions and try to impair a better standard of living for us.</p> <p>You chose to focus on the number of homes, we are no longer a village, as much as you may want to cling onto the idea and regeneration is long overdue.</p>	
11.	Dr Jonathan Wheeldon	<p>Many thanks for this, a very thorough and impressive piece of work. As a Petersham Common Conservator, I am very much in support of the values and principles of the Plan. ...my only specific comment relates to accuracy of one of the maps, as follows:</p> <p>On map 2, page 16, the colour coding of my house (under the D of MEADOW on the south side of Meadow Close, is incorrectly coded as post-1964. <u>It should be coded as the oldest category (pre-1880)</u>. Conversely, the 3 blocks (6 semi-detached) houses on the north side of Meadow Close are incorrectly coded pre-1880 and <u>should be colour-coded as post-1964</u>.</p> <p>If this isn't a map which the Neighbourhood Forum has created, could you please let me know who is responsible for maintaining it so that I can follow up.</p>	<p>The map is really intended to show the general phases of development of Ham and Petersham, rather than the age of each street or building. Most of what is now Meadow Close was undeveloped pre-1880, although some of the land to the rear of what is now the Fox and Duck was developed. The map has been amended to make it clear that it is showing broad phases of development.</p>

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Travel and Streets			
1.	Richmond Housing	4.5.1 A ratio of one cycle space per bedspace is stated	For cycling to be a viable sustainable travel option all

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	Partnership (RHP)	which could equate to seven or eight spaces for a four bedroom property; this is excessive and would adversely affect the quality of the scheme's design and landscaping. The London Plan requires one space per studio/one bedroom flat and two spaces for larger properties and we'd request these ratios are encouraged in the Neighbourhood Plan.	<p>members of the household would need to own and be able to store their cycle.</p> <p>The intention of the policy to allow one space per resident, which is one per bedspace. Acknowledging that a 4 double bedroomed house would theoretically need 8 cycle parking spaces the policy has been amended to read 'up to a maximum of 4 cycle spaces per dwelling'.</p> <p>Cycle storage needs to be secure, within stores and sensitively integrated into the design in the same way that car parking should be sensitively integrated. Neither provision should negatively impact upon the design.</p> <p>Transport for London have commented: <i>Policy T3 sets out cycle parking requirements for residential development at a rate of one cycle space per bed space. This is in accordance with the minimum London Plan standards and is therefore welcomed. Cycle parking for non-residential use should be provided in line with the London Plan.</i></p> <p>Transport for London (TfL) TfL analysis of cycling potential shows that the potential for growth in cycling in Ham and Petersham is greater than any region in Richmond borough. This needs to be supported to take the opportunity to maximise this potential.</p>
2.	Indigo Planning on behalf of Beechcroft Developments Ltd	Policy T3. Cycle Storage. One space per bedspace at odds with Development Management Plan and London Plan and emerging Local Plan. No evidence to justify increase. Should be brought in line with other Plans.	As above.
3.	Transport for London (TfL)	Policy T1 requires residential development above 10 units to be supported with a Travel Plan and provide off-	Para 4.3.2 Reference to ATTrBuTE and Destination Travel Plans to be added

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		street car club spaces. This is supported in line with London Plan policy 6.3 and reference should be made to TfL's ATTrBuTE (Assessment Tool for Travel plan Building Testing and Evaluation) assessment criteria. Destination Travel Plans should also be supported (for employment, education, or leisure) which can be more effective to influence travel behaviour.	
4.	Transport for London (TfL)	Policy T2 relates to improvements to transport infrastructure and sets out prioritised schemes for the area. Improvements to the bus network should be included within these priorities and reference should be made to support bus service, priority and design that aims to ensure reliability and variability of bus services, and improves connectivity in line with London Plan policy 6.7.	Accepted
5.	Transport for London (TfL)	Policy T3 sets out cycle parking requirements for residential development at a rate of one cycle space per bed space. This is in accordance with the minimum London Plan standards and is therefore welcomed. Cycle parking for non-residential use should be provided in line with the London Plan. Transport for London (TfL)	The support for the proposed cycle storage standard for new residential development is noted and welcomed. The recommendation that cycle parking standards for non residential should be included is accepted and Policy T3 will be revised accordingly
6.	Richard Woolf and Fiona McDaniel	T2 Obj 1.1.7 includes encouraging use of public transport but there is no reference to integrating public transport in section 4.4. Is this deliberate? A feasibility study of the foot / cycle bridge should include the location so the 'Radnor Bridge' is included. Support inclusion of project in NP providing it is not site specific at this stage.	Improvements to the bus network will be added within the priorities and reference made to support bus service, priority and design that aims to ensure reliability and variability of bus services, and improves connectivity. The location of a foot / cycle bridge between Ham and Twickenham will form part of the feasibility study to take this proposal forward although there was a strong preference at

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			the Travel and Streets workshop for a bridge at the end of Ham Street.
7.	Michael Burgess	<p>1.1.7 Travel and Streets</p> <p>Other than improvements to walking and cycling routes the plans says very little about transport offers little or nothing in the way of suggestions or ideas as to how to tackle or accommodate the current levels of traffic let alone the increases that will inevitably follow from the developments planned for Ham Close, the Cassell, St Michael's Convent and the ever-expanding schools.</p> <p>The reality is, as the plan acknowledges, that the residents of Ham are heavily dependent upon the car for transport. Given the age of the population and the distances to be travelled cycling and walking are never going to be a realistic alternative for the majority of residents. Most cycling and walking will, as now, be for recreational purposes. It is simply unrealistic to imagine that families can do their weekly or even daily shop, or in most cases commute to work by bike. Likewise, bikes will have little impact upon the school run and can't be used to carry passengers.</p> <p>Without secure storage facilities at the destination it is impractical in many cases to use a bike - it will simply be stolen or stripped of its parts. It is not realistic to imagine that people will walk around the shops of Richmond and Kingston carrying their bike helmet, pump, cycle lights etc. with them.</p>	Improvements to the bus network will be added within the priorities and reference made to support bus service, priority and design that aims to ensure reliability and variability of bus services, and improves connectivity.
8.	Michael Burgess	4.4 POLICY T2 - Improvements to transport infrastructure The section makes almost no mention of roads or public	The appearance would be subject to planning legislation and procedure.

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		<p>transport other than to suggest that the traffic should be slowed down.</p> <p>Although superficially attractive (particularly to the cycling lobby) the proposal to build a new pedestrian and cycle bridge across the river will have massive and unintended consequences on the area.</p> <ol style="list-style-type: none"> 1. In terms of appearance it will damage forever one of the few unspoiled sections of river and one of Ham's major assets. 2. By providing a link to Twickenham it will at a stroke remove one of Ham's greatest assets - its insularity. 3. Lastly and most importantly it will have the unintended consequence of turning Ham into a commuter parking lot for people working in and visiting Twickenham. In the same way as people currently park on Ham Common and then get a bus to work anyone living to the south of the river will have a massive incentive to park in Ham and walk the short distance across the bridge to their office rather than drive there via Richmond or Kingston Bridge. The result will be a substantial increase in traffic in Ham, a massive increase in parking. Any attempt to implement controlled parking in the Ham house car park will simply push the problem further into Ham and result in the entire area becoming a controlled parking zone. 	<p>The attractiveness of Ham's relative isolation is acknowledged in the Plan, however on balance residents have shown majority support for a bridge which allows walking and cycling only. This would have the benefit of making available alternative public transport options on the other side of the river and potentially decreasing reliance on motor transport. It would also generate footfall to support Ham's commercial premises and pubs.</p> <p>The potential for a bridge to encourage parking in Ham would need to be reviewed and an effective management proposal agreed as part of the feasibility process. This would include widespread public involvement.</p>
9.	Michael Winsor	<p>Yes please more 20 mph limits but more than that cycle lane provisions or allow shared paths with bike and pedestrians because the main Petersham road is down right lethal for cyclists with drivers crossing Ham Common from the shops too fast, often to chase the lights by the new inn.</p>	<p>The provision of a fully connected cycle network which is segregated where possible is an aspiration of the Plan.</p>
10	Adrian Mecz	<p>A 20 blanket mph limit throughout Ham and Petersham is</p>	<p>The provision of 20mph limits is now being implemented in</p>

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		a poorly thought out proposal that would add to safety concerns in the era. It would, inter alia, make safe overtaking of cyclists going well under 20 mph more hazardous. The existing speed limits adequately protect safety and the existing 20 mph zones need not be expanded to achieve safety benefits.	many London boroughs. It would be subject to consultation and majority consensus by residents. Ideally segregated cycle and walking infrastructure would be provided but where this is not provided, slower speeds make the road environment safer for vulnerable road users.
11	G. Bell	T1 The policy of providing car club spaces for developments over 10 units is highly unrealistic. For one reason or another car clubs have not taken off in the borough over the last ten years. What is required is designated and properly demarcated visitor spaces, which could perhaps double up as car club spaces. T3 One cycle space per bed space seems far too generous. Is the requirement for every individual unit or for groups of units. What is a bedspace? Is a double bed two spaces?	It is considered that car clubs could have a role to play in a Travel Plan for a new development Response regarding number of cycle parking spaces is as above
12	E. Lodh	V. little you can do about Petersham Rd. there are two good bus services. You can't force people to cycle. Ham Close development will lead to a huge increase in traffic. Against a 20 mph speed limit except outside schools. It could increase air pollution.	Noted
13	Nigel Morris	T2 (5) Bridge ok – 3 options to investigate: 1.Ham House Car park 2 Eel pie island 3 Radnor Gardens	Noted

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Community Facilities			

Ref No.	Name /Organisation	Summary of response received	Neighbourhood Forum Response
1.	Richmond Clinical Commissioning Group (CCG). Responding on behalf of the RCCG, NHS England (NHSE), NHS London Healthy Urban Development Unit (HUDU) and NHS Property Services (NHS PS).	Policy CF2. Community Facilities should reflect the criteria in Local Plan policy LP 28 'Social and Community Infrastructure' which ensures that proposals for new or extended health facilities would be supported, in principle, where need has been identified. The loss of existing health facilities would only be approved where alternative provision is made according to local need. There is pressure on health facilities across the borough with some shortfall in GP floorspace in each of the four commissioning clusters in the borough. This is recognised in paragraph 8.3.17 of the Local Plan. The CCG and the Council will continue to work together to monitor the impact of growth and identify where new or enhanced provision is needed, which will inevitably change over the 15-year plan period.	Policy CF2 is considered to be in conformity with Policy LP28 adding a specific requirement on residential development proposals for impact assessment given community concerns re pressures on facilities and Ham and Petersham's relatively isolated situation.
2.	Richmond Clinical Commissioning Group (CCG). Responding on behalf of the RCCG, NHS England (NHSE), NHS London Healthy Urban Development Unit (HUDU) and NHS Property Services (NHS PS).	Policy CF1 'Impact of development' is consistent with criterion E of Local Plan Policy LP 28.	Agreed
3.	Richmond Clinical Commissioning Group (CCG).	The CCG and NHSE have noted the concern within the community in relation to access to GP services (5.2.2). This has been logged for consideration of the CCG's	NF welcomes your acknowledgement and consideration of this concern

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	Responding on behalf of the RCCG, NHS England (NHSE), NHS London Healthy Urban Development Unit (HUDU) and NHS Property Services (NHS PS).	Primary Care Operational Group.	
4.	HRLL	5.2.3 Is it correct to say that the Russel School has been expanded as it is still a one form entry school?	It is/has undergone substantial new physical development, so Neighbourhood Forum considers expansion is a reasonable term to use in the Neighbourhood Plan.
5.	Kathleen Massey	5.3 POLICY CF1 In agreement with Impact of development statements esp. 5.3.1 Serious consideration essential re: introducing more cars into an already dense area of housing and parking.	Noted. Re 5.3.1, policy is directed towards community facilities, whereas traffic and parking impacts are considered mainly under Section 4 – Travel and Streets.
6.	Daniel Hearsom, Pembroke Lodge	Re. CF2 strongly support as community facilities underfunded	Noted
7.	Zoe Hughes, Sport England	<p>Planning Policy in the National Planning Policy Framework 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 and providing enough sports facilities of the right quality and type and in the right places is vital to achieving this aim. This means positive planning for sport, protection from unnecessary loss of sports facilities and an integrated approach to providing new housing and employment land and community facilities provision is important.</p> <p>It is important therefore that the Neighbourhood Plan</p>	The NP is considered to be in conformity with national and local plan policy, but does not feel these need to be duplicated in the NP. Playing field assessments have identified pressures and needs, but there are no proposals for addressing these in the NP. Upgrading changing facilities at King Georges Field may be a project for consideration under the CIL projects list.

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		<p>reflects national policy for sport as set out in the above document with particular reference to Pars 73 and 74 to ensure proposals comply with National Planning Policy. It is also important to be aware of Sport England's role in protecting playing fields and the presumption against the loss of playing fields (see link below), as set out in our national guide, 'A Sporting Future for the Playing Fields of England – Planning Policy Statement'. http://www.sportengland.org/facilities-planning/planning-for-sport/development-management/planning-applications/playing-field-land/</p> <p>Sport England provides guidance on developing policy for sport and further information can be found following the link below: http://www.sportengland.org/facilities-planning/planning-for-sport/forward-planning/</p> <p>Sport England works with Local Authorities to ensure Local Plan policy is underpinned by robust and up to date assessments and strategies for indoor and outdoor sports delivery. If local authorities have prepared a Playing Pitch Strategy or other indoor/outdoor sports strategy it will be important that the Neighbourhood Plan reflects the recommendations set out in that document and that any local investment opportunities, such as the Community Infrastructure Levy, are utilised to support the delivery of those recommendations. http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/</p> <p>If new sports facilities are being proposed Sport England recommend you ensure such facilities are fit for purpose and designed in accordance with our design guidance notes. http://www.sportengland.org/facilities-planning/tools-</p>	

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		guidance/design-and-cost-guidance/	

Ref No.	Name /Organisation	Summary of response received	Neighbourhood Forum Response
Retail and Local Services			
1.	Richard Woolf and Fiona McDaniel	No mention of Ham General Stores in Ham Street.	Noted – individual shops have not been mentioned.
2.	Kathleen Massey	6.3 Policy R1 Support these statements as outlined above for Ham Parade in particular. More diversity of retail services is desirable.	Noted

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Green Spaces			
1.	Richmond Housing Partnership (RHP)	Map 8 (p56) On the plan all spaces are headed 'public open space' but this isn't correct (the list includes land such as school playing fields).	The second column in the key for Map 8 should be headed Private Open Space.
2.	Indigo Planning on behalf of Beechcroft Developments Ltd	Map 8 is inconsistent in that not all large private gardens have been included eg Ormeley Lodge, and therefore inaccurately maps green spaces.	Cassell Hospital and St Michael's Convent are the two private gardens with occasional public access designated or proposed as of townscape importance.
3.	Indigo Planning on behalf of Beechcroft Developments Ltd	Map 8. St Michael's Convent is listed under 'Public Green Spaces' but shown as 'private green space' on the map. The boundary on the Convent site is considered arbitrary and does not relate to OOLTI boundary.	Amend boundary to OOLTI proposed designation.
4.	Kathleen Massey	7.3 POLICY G1 Largely in agreement with these objectives and this policy	Noted
5.	Sharon Jenkins, Natural England	No comment	Noted

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6.	G Bell	G3 Reference to Walnut Tree Allotments – not shown on plan anywhere. Should be on map on p. 56?	Agreed. Revise map to include Walnut Tree Allotments.
7.	N Morris	G1 Would have liked to see something about the future development of Ham Lands. Map refs are wrongly placed. Thames Young Mariners (TYM) site should be opened up, so 3 areas can be combined to form a single park with the link bridge from Twickenham. The wild informal character should be maintained but the boating lake used more widely.	Ham Lands are a Local Nature Reserve, not a park, so there are no development plans, but more frequent review of and more involvement of community in management plans and their implementation is encouraged. TYM, which is owned and run by Surrey County Council, add to end of para 7.2.3 <i>“and more local use of the TYM facilities.”</i> A link bridge to Radnor Gardens is an option, although the favoured location for a pedestrian/cycle bridge to Twickenham is from the end of Ham Street.

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Environmental Sustainability			
1.	Savills on behalf of Thames Water Utilities Ltd	Policy E4. Draws attention to requirements in NPPF regarding the need for new development to be co-ordinated with water supply and disposal. Suggests additional policy: <i>“Water Supply, Wastewater & Sewerage Infrastructure 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. Drainage on the site must maintain separation of foul</i>	Already covered in Local Plan policy LP23 – no need to duplicate

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		<p>and surface flows. 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. ”</p>	
2.	Savills on behalf of Thames Water Utilities Ltd	Water Efficiency. 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.	The Richmond Local Plan submission version para 6.3.4 adopts the 'optional' higher national technical standard for water consumption of 110 litres per person per day (including an allowance of 5 litres or less per person per day for external water consumption) in line with the national technical standard set out in Part G of the Building Regulations 2013. All new residential developments including conversions, reversions, change of use and extensions that create one or more new dwellings must meet this target.
3.	Savills on behalf of Thames Water Utilities Ltd	Para 8.7. Managing Flood Risk Support in principle. Policy should also require positively pumped devices from waste water outlet in basements.	This is adequately covered in Richmond Local Plan policy LP11 and supporting text para 4.11.8 already covers this. No need to duplicate
4.	Savills on behalf of Thames Water Utilities Ltd	Policy E5 SuDS. Generally supports and suggests additional paragraph: “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.”	London Plan hierarchy and Richmond Local Plan submission version policy LP 23 already covers this. No need to duplicate
5.	Richmond Housing Partnership (RHP)	8.5.1 ‘All new houses should provide an electric charging point for cars’. We suggest this is desirable but not essential.	Richmond Council comment that EV charging points for new houses can only be provided if there is off street parking. Higher level plans and policies make explicit the provision required for EV’s. The HPNF accept this comment
6.	Transport for London	Policy E3 requires all new dwellings to provide Electric	Noted

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	(TfL)	Vehicle Charging Points (EVCPs). The emphasis towards the provision of EVCPs is welcomed by TfL, assuming that all provision is in line with the standards set out in the London Plan policy 6.13 for residential and non-residential development.	
7.	Richard Woolf and Fiona McDaniel	8.9.1 & 8.9.2. Very concerned that all new hardstands and forecourt parking areas to be constructed of permeable materials. Believe policy is too dictatorial and that gravel, permeable concrete block paving or porous asphalt are completely inappropriate for many of the historic poperies in the area. Natural materials such as stone flags or granite sets would be more appropriate and surface water could be directed to a lawn or border to drain naturally or to a soak away if required.	Accepted – proposed revised policy <i>There is a general presumption against the provision of front garden car parking in accordance with LP 45 of Richmond Local Plan submission version. Any new hardstandings and forecourt parking areas must be permeable or constructed so that the surface drains to a lawn or border.</i>
8.	Environment Agency	<p>Ham and Petersham is within the Richmond policy unit of the TE2100 Action Plan. The recommended flood risk management policy for this area is policy P5-<i>t'take further action to reduce flood risk beyond that required to keep pace with climate Change.</i> We recommend referencing this policy unit and actions within the Neighbourhood Plan to show the complex interaction of flooding and climate change in Richmond from tidal, fluvial, groundwater and surface water flooding.</p> <p>The local issue is that defence raising may not be acceptable in all areas and an alternative approach would be a combination of local secondary defences and floodplain management to reduce the impact of flooding to existing properties and other assets.</p> <p>What TE2100 Plan means for Richmond borough: <input type="checkbox"/> areas of unprotected floodplain in Richmond will</p>	<p>New paragraph to incorporate TE2100 and the River Thames Scheme inserted after 8.7.1.</p> <p>8.7.2 <i>For the tidal Thames the Thames Estuary 2100 (TE2100) Plan proposes future improvements to the River Thames tidal flood defences to manage tidal flood risk. For fluvial flooding on the Thames upstream of Teddington Lock, the River Thames Scheme is proposed which may include new weirs across Teddington Ait and some recontouring of Ham Lands to create a natural flood storage area.</i></p>

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		<p>flood more frequently as water levels rise. The Thames Barrier will continue to provide tidal flood protection to the same high standard as the rest of London, but over the next 25 years there needs to be new ways of managing fluvial flooding other than operating the Thames Barrier</p> <ul style="list-style-type: none"> <input type="checkbox"/> space for water and the shape and space for maintenance and renewal of flood management assets will need to be identified and spatial and emergency planning will have an increasing role in managing and reducing flood risk. 	
9.	Environment Agency	<p>Suggested TE2100 policy messages to be included in NP A specific commitment for the council and the neighbourhood forum to work with the Environment Agency and others to ensure the recommendations of the TE2100 plan are implemented in new and existing developments, to keep communities safe from flooding in a changing climate and improving the local environment.</p> <p>A requirement for new developments to help reduce flood risk now and into the future and to act on the recommendations of the TE2100 plan. This could include for example:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Safeguarding land beside flood defences where it is expected that defence raising and improvements will be required in the future, including secondary defences and defence realignment; <input type="checkbox"/> Maintaining, enhancing or replacing flood defences so they provide adequate protection for the lifetime of development; <input type="checkbox"/> Where opportunities exist, re-aligning or setting back flood defence walls and improving the river frontage to provide amenity space, habitat, access 	Richmod Local Plan submission version Policy LP 21 supports both TE2100 and the River Thames Scheme and is sufficient to cover the requirements set out by the Environment Agency.

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		and environmental enhancement. Further suggestions relate to tidal flood defences.	
10	Environment Agency	Para 8.7.1 Suggested revision <i>“This Neighbourhood Plan supports the Environment Agency’s proposed River Thames Scheme to reduce the risk of flooding both upstream of Ham and Petersham including appropriate potential flood risk reductions opportunities on Ham Lands. This approach builds on policy LP 21 of the LBRuT Local Plan Publication Version December 2016.”</i>	Noted – have proposed a new paragraph to reference the River Thames Scheme and TE2100
11	Environment Agency	Riverside Development – various recommendations regarding riverside developments	noted
12	Environment Agency	Tow Path flooding – various, mainly environmental, suggestions are made to be incorporated into any measures to relieve flooding of the towpath	noted
13	Environment Agency	Draws attention to relevant objectives and actions of the Thames River Basin District Flood Risk Management Plan	noted
14	Environment Agency	Information about the Thames River Basin Management Plan.	noted
15		Policy E5 We support Policy E5 Sustainable Drainage (SuDS). It will be essential that SUDS are properly planned at the onset of planning for new development. Developers and their design teams need to take into account different factors including the layout of the site, topography and geology when planning and positioning the different SUDS elements for the whole scheme. Draws attention to revised Planning Practice Guidance relating to SuDS.	Noted and agreed

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Opportunities for Change			
1.	Richard Woolf and Fiona McDaniel	Sites discussed in this section are mainly those already under consideration for development and enhancement. Makes no allowance for intensification of existing large sites eg various schools, Ham Polo Club or Kew Football Club.	More intensive use of existing facilities is difficult to foresee and therefore the cumulative impact arising from greater use is also difficult to plan for until it arises. This is acknowledged as a very valid point and should be monitored during the course of the Plan with a view to remedial measures being taken if necessary.
Opportunities for Change: Ham Parade			
2.	Jane and Ray Morrison	We agree with the policy to improve safety on Ham Parade	Noted
3.	Kathleen Massey	9.3 POLICY 01 & 9.5 POLICY 02 In agreement	Noted

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Opportunities for Change: St Richards Square			
1	Jane and Ray Morrison	We agree with the policy to improve safety on Ham Parade	Noted

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Opportunities for Change: Central Petersham			
1	Michael Massey	9.4 St Richards square Although a nice idea Croft way is one of the few links from the centre of Ham to Riverside Drive - any attempt to restrict traffic here will simply exacerbate the problems in other parts of Ham and particularly so if an additional 200 houses are built at Ham Close. The sad fact	These are very valid points and will need to be taken into account when a planning application is made for Ham Close and when detailed proposals for St Richard's Square are prepared.

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		is that if RHP proceed with the redevelopment of Ham Close this entire area will be rendered unusable for years to come by construction vehicles and other traffic. Furthermore, any realistic traffic plan should provide a route out of the area other than via Ham Street or Sandy Lane.	

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Opportunities for Change: Central Ham			
1.	Richmond Clinical Commissioning Group (CCG). Responding on behalf of the RCCG, NHS England (NHSE), NHS London Healthy Urban Development Unit (HUDU) and NHS Property Services (NHS PS).	With regard to 'Central Ham' (section 9.8) it is suggested that paragraph 9.8.3 should not pre-empt Hounslow and Richmond Community Healthcare NHS Trust intentions for Ham Clinic, or refer to a specific requirement for a 'GP practice' ... 'providing the full range of local health and wellbeing services', but rather should mention that both Hounslow and Richmond Community Healthcare NHS Trust and the CCG are working with Richmond Housing Partnership as part of the overall regeneration of Ham Close. Policy 04a (ii) and paragraph 9.9.5 should have regard to Policy CF 2 which in turn should reflect Local Plan policy LP 28 as suggested above.	The Forum would welcome discussions with the CCG with regard to GP services and facilities in the area both in the context of the Ham Close development and the wider neighbourhood.
2.	Richmond Housing Partnership (RHP)	Policy 04a (9.9.iii) The Ham Close proposals include the re-provision and improvement of existing community facilities and subsequent more detailed design will assess whether existing facilities are required. We suggest that the need to provide more community space in addition to new and improved facilities has not been established and request that this clause should be amended to reflect	Policy CF1 to which Policy 04a refers requires the impact on existing community infrastructure to be assessed and that this is part of the development of proposals for Ham Close is welcomed.

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		this.	
3.	Richmond Housing Partnership (RHP)	This states specifically how and where Ham Close community facilities should be located. Such community infrastructure should be designed in terms of type, size and location in conjunction with the communities it will serve and the autumn 2016 consultation included specific questions on this scheme element. We'd ask that this section is revised to reflect that the design is still to be developed with Ham Close residents and other stakeholders.	The role of the Neighbourhood Plan is to ensure that neighbourhood wide considerations are taken into account which is why specific guidance is included on the location of the community facilities.
4.	Richmond Housing Partnership (RHP)	P 112 This section is part of the Ham Close character study. It states that 'most of the flats house families' but this isn't true, the majority of the properties are studios and one bedroom flats (56%) and, whilst there is an element of over-occupancy there is also some under-occupancy, particularly by residents who have lived there since the original scheme's construction. There are also many single households. We'd ask that this section is corrected.	Noted
5.	Richmond Housing Partnership (RHP)	P 114 The September 2016 consultation referenced took place over September and October 2016. It would be useful please to reference the outcome of this which differed from the 400 unit scheme from 2015 which met such opposition – the autumn 2016 scheme of 425 units was received much more positively as it addressed many of the previous concerns with regard to site boundary (eg excluding the village green and the library), open layout with green link and location of taller buildings towards the middle of the site.	The NP has been amended to acknowledge that consultation and feasibility studies are ongoing and will continue through 2017 (para 9.8.2). Referring to one phase of the consultation would result in the Plan becoming out of date as the scheme develops.
6.	Richmond Housing Partnership (RHP)	P114 RHP is still receiving 'Right to Buy' applications from Ham Close tenants so the assumption stated should	Noted and will amend text to <i>The 'Right to Buy' scheme has resulted in changes to the social</i>

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		be revised. Richmond Housing Partnership (RHP)	<i>composition of residents.</i>
7.	HRLL	Our main concern is the planned expansion of the Ham Close housing. Since the Wates Estate was built in 1965, the residents of 42-82 Woodville have enjoyed the amenity of an open view across the St. Richards School playing field with just one single storey building on site. The Plans are for 6 storey blocks to be built along the frontage facing these houses and thereby removing the amenity they have always enjoyed. It is appreciated that in planning terms, this is a weak argument as no doubt, the 20m distance will be maintained and it is understand there is no right to a view. However, there is no doubt that values of these properties will lessen as a result and so there will be not only a loss of amenity but also a financial one as well.	Noted. Height issue addressed in policy H5
8.	HRLL	The new Ham Close estate will place approximately 425 dwellings on 12.5 acres whereas the HRLL holding has 483 dwellings on 25 acres. The open aspects of our holding together a great deal of soft landscaping consisting grassed area and 380 trees of various types. The new Ham Close must be much more cramped than the HRLL holding undermining the much valued open aspects of housing in Ham & Petersham mentioned in your plan.	Noted – the Neighbourhood Plan requires the context of the site to be an important factor in designing a scheme.
9.	HRLL	Concerned by the extra traffic which the new Ham Close estate will generate. Our two roads which are nearest to the site, namely Woodville and Stuart Road are already heavily parked and any overspill from the new Ham Close will make matters much worse.	Noted This will need to be addressed in developing the Travel Plan for a development.

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10	Michael Burgess	9.9.1 Central Ham RHP's claim to have lost £100 million as a result of the 2015 budget appears to be a gross exaggeration (I can provide the figures by separate cover anyone is interested). Pressure should be put upon them to reconsider a refurbishment proposal rather than the massive redevelopment that they claim is necessary.	Noted
11	James Parsons	Re. O3, requests further detail as hard to see how existing carriageways and footpaths could be changed	Detailed designs are not likely to be prepared until towards the end of the redevelopment of the estate.

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Opportunities for Change: Cassel Hospital			
1.	Historic England we welcome the explicit referencing of heritage assets, such as the Cassel Hospital ... where there are listed buildings. Thorough referencing of heritage assets that might be directly or indirectly affected by developments should help ensure that developers come in with more sensitive proposals that will enhance local character. To that end it would be helpful to also include references to landscapes and archaeology.	Noted
2.	Lichfields on behalf of the West London Mental Health Trust.	Para 9.13.1: We suggest that reference to the Register of Surplus Public Sector Land is removed from the supporting text. The Trust is in the process of removing the Cassel Hospital site from the Register until such time as a strategy for the site is known, which as mentioned could include the retention of the CSPD service and/or renting out part of the site, rather than the sale of the whole site for an alternative use.	Noted – reference will be removed.

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3.	Lichfields on behalf of the West London Mental Health Trust.	<p>Suggested Revision - Para 9.13.2. "The Neighbourhood Plan seeks to retain and enhance the listed buildings and grounds for the enjoyment of the community, while realising the potential of the site for suitable uses and possible new development, which could fund improvements to the buildings and 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, if no replacement community use can be identified. The site would also be a suitable location for a new changing room or club house serving the historic cricket ground on Ham Common."</p> <p>The above amendments are proposed to remove reference in the text that the site is an existing community asset and reflect the Trust's position in being unable to agree to the provision of new cricket facilities on the site.</p>	<p>The Richmond Local Plan submission version identifies the site as suitable for social and community infrastructure uses and it is considered that a cricket pavilion could fall into those categories as part of an overall development package.</p>
4.	Lichfields on behalf of the West London Mental Health Trust.	<p>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 conserving the character 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 and make provision for managed public access including a pedestrian and cycle 	<p>The NP has been amended with a view to providing guidance within which a development scheme could be progressed which meets both the Trusts objectives and community aspirations.</p>

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		<p>route between Dukes Avenue and Ham Common; iii) Rationalise access to the site, which may include a potential new pedestrian/vehicular access; with a possible new pedestrian only point off Dukes Avenue/Craig Road at the western corner of the site; iv) Enhance the setting of the listed buildings, particularly in the way they relate to Ham Common. v) Limited development in the least sensitive parts of the grounds may be considered acceptable and may include residential development and/or community uses. Provided it is for sheltered or affordable housing or for community use."</p> <p>As previously mentioned, 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 not within the Trust's authority at this time. As such the Trust is not in a position to accept this policy wording. 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) of the Planning (Listed Building and Conservation Areas) Act 1990 which provides the statutory test in relation listed buildings. 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.</p>	
5.	Lichfields on behalf of the West London	Para. 9.14.2: <i>"The future use of this site is currently being</i>	As above

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	Mental Health Trust.	<p><i>considered by the WLMHT. The Forum will work proactively with the WLMHT or future developer to encourage development at the site. and the Homes and Communities Agency. A development brief to identify development potential and guide the way the site is to be enhanced would assist this process.</i></p> <p><i>The least sensitive parts of the grounds front onto Warners Lane on the south western boundary of the site.”</i></p> <p>The Trust is the sole owner of the site and as such reference to the Homes and Communities Agency should be removed. Furthermore, we propose that reference to the production of a development brief is removed from the policy. As 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, a development brief is not considered the most appropriate measure to encourage development at the site. Instead, it is proposed that reference is made to collaborative working between the Forum and the Trust to encourage development at the site should it come forward.</p>	
6.	Lichfields on behalf of the West London Mental Health Trust.	<p>Para. 9.14.3: “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 older persons’ housing would secure the future of the listed building and the future management of the important grounds. This should include management public access to the grounds. This builds on Policy SA 15 of the LBRuT Local Plan Publication</p>	As above

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		<p>Version December 2016.”</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>	
7.	<p>Ms Linda Stradins, Service Manager, Cassel Hospital, Dr. Oliver Dale, Clinical Lead, Cassel Hospital, (WLMHT)</p>	<p>Para 9.14 Pol O5 The policy states that; “<i>Development of the site either for the existing or alternative community use or for older persons’ housing would secure the future of the listed building and the future management of the important grounds.</i>”</p> <p>The current provision is a 16 bedded Specialist Personality Disorder Inpatient unit, together with a community provision for up to 28 patients across Greater London. We recognise that the site is under-utilised, current options are also being considered for social and health use. We are in support of expansions/development in line with the Council’s plans.</p> <p>We are however concerned that the plan does not put forward a suggestion that the current provision could also co-exist with other services or provision and are keen for this option to be included.</p>	<p>References to the site being declared redundant have been removed. The Neighbourhood Plan seeks to provide guidance on the future development of the site whether it continues to be occupied solely by the Trust or by a mixture of Trust services and other uses or if the Trust were to vacate the site. The Plan proposes a development brief as a process through which a scheme meeting both Trust objectives and community aspirations could be progressed.</p>
8.	<p>Sir David Williams</p>	<p>I write as the Vice Chair of the Cassel Hospital Charitable Trust in relation to sections 9.13 and 9.14 on page 81 of the draft plan.</p> <p>The implication of 9.13 and 9.14 is that the site is potentially redundant. This is not the case. While consideration should be given to the possibilities for the site if it becomes partially or wholly available, the first priority should be to continue the specialist health facility on this site. Expansion of the mental health services on the site are under consideration. Only if this is not possible and the current services are relocated should the policies and priorities come into play. Please alter the priorities and the implication of the site being redundant.</p>	<p>As above</p>

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9.	Nigel Morris	9.14 O5v Almost the only substantial site which could take affordable housing. I'd like to see high density/low rise development around retained green spaces. Genuinely affordable or shared ownership.	A large part of the site is designated as OOLTI in the Richmond Local Plan submission version and to be 'in conformity' with the Local Plan this must be acknowledged in the policies for this site making a large scale redevelopment unacceptable.
10		9.16 O6 iii An ideal site for graduated housing for the elderly from independent to warden-assisted to nursing and dementia care. Scope for building on some of the garden if sensitively done.	Noted

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Opportunities for Change: St Michael's Convent			
1.	Indigo Planning Ltd on behalf of Beechcroft Developments Ltd.	It is incorrect to state that the gardens of St Michaels Convent are designated Other Open Land of Townscape Importance as the OOLTI designation only exists in draft form within the emerging Local Plan, which is yet to be subject to an Examination in Public. Beechcroft have submitted objections to the designation in the pre publication and publication versions of the Richmond Local Plan. The draft designation of the gardens as OOLTI is therefore afforded limited weight, in accordance with paragraph 216 of the NPPF.	This view is noted
2.	Indigo Planning on behalf of Beechcroft Developments Ltd	Policy O6 ii – St Michael's Convent. Suggest 'building' should be used in preference to house to reflect the many additions to the original house.	Agreed
3.	Indigo Planning on behalf of Beechcroft Developments Ltd	Policy O6iii – The restriction of vehicle access point is not justified as no evidence is provided to support this restriction. '... 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	Since the major part of the garden is to be designated as OOLTI where development is inappropriate it is considered that the existing access points to the site are adequate to serve the development proposed in the Plan

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		of new vehicle access points at the site.'	
4.	Indigo Planning on behalf of Beechcroft Developments Ltd	Policy O6 iv. There has not been public access to this private site except by permission on a couple of times per year. Policy O6 therefore cannot 'secure managed public access' to the site and this part of the policy should be removed.	It is acknowledged that this is a private site but it is considered that as part of the future development of the site limited public access to the gardens would be enable this local asset to be appreciated by local residents having regard to the proposed status as OOLTI
5.	Historic England	... we welcome the explicit referencing of heritage assets, such as St Michael's Convent ... where there are listed buildings. Thorough referencing of heritage assets that might be directly or indirectly affected by developments should help ensure that developers come in with more sensitive proposals that will enhance local character. To that end it would be helpful to also include references to landscapes and archaeology.	Noted
6.	Jane and Ray Morrison	<p>Convent Site. We support the designation of OOLTI and OSNI on this site.</p> <p>We agree</p> <ul style="list-style-type: none"> • that any development should enhance the integrity of the listed buildings and preserve their setting. • A relationship should be maintained between house and gardens keeping the special character. • New building and parking should be restricted to areas of site already developed. • No new vehicle access points should be allowed • Biodiversity and historic planting of the grounds should be maintained and enhanced. 	Noted
7.	Martingales Close Residents'	Policy 06 para 9.16.1 iii We strongly support this policy. We do not believe there should be access to the site	Noted

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	Association	<p>other than from Ham Common – there has never been vehicular access via Martingales since the road was built. Access would make this road less safe and would fundamentally harm its character.</p> <p>We also agree that to protect the integrity of the listed building and how the grounds contribute to both its setting and that of the wider conservation area it is essential the area of building is strictly limited. It is clearly the role of the Neighbourhood plan to make such restrictions on development without the need for further evidence other than the comprehensive consultation that has been carried out in the development of this plan.</p>	
8.	Martingales Close Residents' Association	9.16.i This policy rightly recognises that this is a listed building in a conservation area. It does an excellent job at defining that the house and gardens must keep their integrity for these two designations to be upheld. This is clearly evidenced by the conservation area description including the pressure “Development pressure which may harm the balance of the landscape-dominated setting, and the obstruction or spoiling of views, skylines and landmarks”	Noted
9.	Martingales Close Residents' Association	9.16.1.ii The gardens are integral to the house. They are an unspoilt oasis for nature and act as an important part of the green corridor. This is evidenced by the support for their protection by a wide range of groups and individuals.	Noted
10	Martingales Close Residents' Association	9.16.1. iv An extensive study of the site has been carried out to show its remarkable biodiversity and importance in the green corridor from the River Thames to Ham Common and Richmond Park. The people of Ham and Petersham care deeply for their green space and the	Noted

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		wildlife and trees that make it. This policy will achieve the vision of retaining this crucial aspect of the character of the area.	
11	Kathleen Massey	9.15 & 9.16 POLICY 06 Wholeheartedly in agreement, especially regarding the importance of the OOLTI and OSNI designations for St Michael's Convent and gardens	Noted

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Opportunities for Change: Previously developed brownfield land etc.			
1.	Indigo Planning on behalf of Beechcroft Developments Ltd	Map 17 is entitled Garage Development Infill Sites but includes St Michael's Convent.	Map will be amended
2.	Indigo Planning on behalf of Beechcroft Developments Ltd	Para 9.18. This policy is overly restrictive by restricting development of open or backland spaces that contribute to the character of the locality, such as private gardens. The policy prevents development from coming forward on sustainable sites that help meet local housing 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.	Policy LP39 of the Richmond Local Plan submission version provides detailed guidance the development of backland and infill sites and development of rear gardens. In order to be in conformity with the Local Plan the Neighbourhood Plan must follow this guidance.
3.	Richard Woolf and Fiona McDaniel	Confused about brownfield sites as some marked on map are backland sites.	Map will be amended
4.	Richard Woolf and Fiona McDaniel	9.18.4. Statement 'backland garden sites is not considered appropriate and will be resisted' is contrary to policy LP39 in publication version of Local Plan. Suggest NP should be amended to reflect Local Plan which sets	This paragraph makes reference to LP 39 in the Richmond Local Plan submission version which will be the planning policy context within which backland garden sites will be assessed.

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		out criteria backland development must meet.	

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Appendix 3: Implementation Programme			
1.	Historic England	We also note that in the implementation programme, Historic England is highlighted as a delivery partner. We would be happy to discuss the production of updated historic area character assessments with yourselves, local amenity groups and the Council in due course.	Noted and welcomed
2.	Martingales Close Residents' Association	Bridge between Ham and Twickenham. This will waste a lot of money and will fundamentally damage the character of Ham and Petersham	The proposed feasibility study will provide the opportunity for this long standing proposal to be debated in depth.
3.	Martingales Close Residents' Association	20mph Speed Limit. Until the current speed limits be they 20mph or 30mph are enforced this is a pointless policy.	Noted. Enforcement is a matter for the Metropolitan Police.
4.	Richard Woolf and Fiona McDaniel	A footbridge will greatly assist and resolve issues of transport and infrastructure.	Noted.

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Appendix 4: Character Areas			
1	Richard Woolf and Fiona McDaniel	Area 7. Wates Estate. There are at least 2 management companies on the Wates estate but no mention of how their stringent requirements dovetail with NP. Believe there is need for positive design guidelines for change which respond to the evolution of lifestyles, eg	The Character Area appraisal for the 'Wates Estate' will be revised to take account of these points and the design guide produced by HRRL.

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		how kitchens and living spaces can be relocated to the ground floor to connect to gardens and how refuse storage and recycling can be located. No covenants on properties in Mariner Gardens Permitted development rights override NP	