

*Submitted via email on 17 July 2017*

**London Borough of Richmond upon Thames**  
**Response to the revised draft chapters of the Ham and Petersham Neighbourhood Plan, Pre-Submission Version**

Thank you for submitting revised draft chapters of the Ham and Petersham Neighbourhood Plan (Pre-Submission Version, 13<sup>th</sup> December 2016) to the London Borough of Richmond upon Thames. We have reviewed the following chapters. For reference, the versions we have used were all sent by email on 22<sup>nd</sup> June, except for Chapter 4 Travel and Streets, which we received on 4<sup>th</sup> July.

1. Introduction
  2. Character and Heritage
  3. Housing
  4. Travel and Streets
  5. Community Facilities
  6. Retail and Local Services
  7. Green Spaces
  8. Environmental Sustainability
  9. Opportunities for Change
- Appendix 3   Implementation Program
- Appendix 4   Neighbourhood Character Studies

As noted in the Council's response during the consultation stage of the Pre-Submission version, we would like to commend the progress that has been made by the Neighbourhood Forum, and acknowledge all the hard work that has been invested in the process by those involved.

In general, we are supportive of the revisions that have been proposed. The following comments are provided to assist the Forum in producing the submission version of the Plan. It should be noted that the comments represent Officer views only, and that approval from Members has not been sought at this stage. Once your final Submission version has been submitted to the Council, it will need to be considered by Cabinet prior to the statutory public consultation taking place.

We focus our comments on new text and on the Forum's responses and revisions in relation to our previously submitted feedback (sent on the 10<sup>th</sup> March 2017). For this reason, we have incorporated our commentary in the same 'schedule of changes' table, thereby maintaining a record of our initial comments, your response, and any further feedback we might have. Please note that where the Forum accepted the amended text exactly as we previously proposed, we have removed the complete row of comments from the table altogether. As we have not seen any revised maps, we have left these comments as they were originally submitted.

We have also made a number of further suggestions that we recommend you to consider and take account of prior to submitting the Plan to the Council, and as this will help increase the likelihood of success at the independent examination. We note that there were a number of changes recommended by the Council which the Forum acknowledged but chose not to incorporate. It is likely that some of these areas may need to be further explored during the examination process and considered by an examiner when undertaking the examination in public.

In addition to the attached schedule, we also include a number of more general comments in relation to the 'basic conditions' and our main areas of concern.

- **Clear justification and evidence:** There should be a clear link between the policies and supporting text and the evidence base used to inform the policies. This is particularly important where the Plan's policies are suggesting an approach that differs from the Local Plan, regional or national guidance. Officers consider that in a number of places there remains a lack of justification or reference to the evidence base to underpin the approach taken. We therefore continue to recommend that each policy is reviewed to ensure it has the necessary context and evidence (including references to the evidence base) to underpin its inclusion and approach. This is to ensure that the Plan will sufficiently address the 'basic condition' relating to '*Having regard to national policies and advice contained in guidance issued by the Secretary of State*'.
- **Sustainable Development:** One of the 'basic conditions' is that the Plan contributes to the achievement of sustainable development. Whilst the majority of policies are seeking to support sustainable development, some policies are overly prescriptive and currently not in conformity with national / regional or local policies, particularly those that may affect the viability and deliverability of new housing development, such as the regeneration of Ham Close.
- **Density:** We have raised in our last response concerns about how the Plan addresses and deals with density. We would like to reiterate this point as we are concerned that the Plan puts too much emphasis on density ranges. Whilst we acknowledge that the area has generally low PTAL ratings, densities should be tested against a number of considerations, with PTAL only being one of them. Care will therefore need to be taken because the policies that refer to density maxima within the Plan could set barriers to larger developments in the area and could affect the viability and deliverability of schemes. This could ultimately lead to conformity issues with the Local Plan and the Plan may not be able to meet the 'basic conditions'.

As a general guide, density should be an output and not an input consideration when designing development schemes. Rather than being guided by the density matrix, the Local Plan requires full consideration of the site's characteristics, surrounding and wider area including their settings, proposed mix of uses, green spaces, landscaping and public realm, play space requirements, servicing and access arrangements etc. Once all these have been fully considered and an appropriate scheme drawn up, then density can be measured (however, it should not inform the design of a scheme). The Council believes that the London Plan density matrix is too crude to apply on a site-level basis and therefore applicants/developers should fully consider all other characteristics.

In this context, it should be noted that even the London Housing SPG states that "Policy 3.4 and Table 3.2 (*i.e. the density matrix*) are critical in assessing individual residential proposals but their inherent flexibility means that Table 3.2 in particular should be used as a starting point and guide rather than as an absolute rule so as to also take proper account of other objectives, especially for dwelling mix, environmental and social infrastructure, the need for other land uses (e.g. employment or commercial floorspace), local character and context, together with other local circumstances, such as improvements to public transport capacity and accessibility." The SPG also states that "In appropriate circumstances, it may be acceptable for a particular scheme to exceed the ranges in the density matrix, providing important qualitative concerns are suitably addressed." Therefore, the Council strongly recommends setting density ranges or maxima within the Neighbourhood Plan and refer instead to the character, setting etc. as mentioned above.

- **Proposals Map:** As previously discussed, we recommend that a Proposals Map is produced for the Ham and Petersham Neighbourhood Plan area. This should not simply repeat the layers already shown on the Council's Proposals map, but instead focus on showing the boundaries of policies set out in the Plan which have spatial implications i.e. areas where specific policies apply, such as the shopping frontages, MOL etc. This should ideally be produced for the submission version of the Plan.

- **Monitoring:** The Plan would benefit from a section that covers monitoring of the Plan's policies. This should ideally be included within the submission version of the Plan.
- **Images:** The draft Pre-Submission plan made reference to a number of images, which would help support the policies of the Plan (particularly in Chapter 2). It would greatly benefit the Plan if these are included.

As we stated in our covering letter concerning the basic conditions statement (sent on 23 June 2017), once the Forum has formally submitted the Ham and Petersham Neighbourhood Plan, along with the basic conditions statement and other relevant documents, the Council will consider the plan against the statutory requirements set out in paragraph 6 of the Schedule 4B of the Town and Country Planning Act 1990 (as amended). Whilst the Council does not have to formally consider the basic conditions until after the independent examination, we will carry out a basic conditions check before we undertake the public consultation and before we jointly appoint an independent examiner. This is to ensure that we avoid any potential risks and costs associated in the event an examiner may not find that the Plan meets the basic conditions.

We hope that the Forum finds the enclosed comments helpful in producing a successful Plan that meets the 'basic conditions'. We look forward to meeting with representatives of the Forum on 19<sup>th</sup> July 2017 to discuss this further.

Yours sincerely

Andrea Kitzberger-Smith  
Planning Policy and Design Team Manager  
Serving Richmond and Wandsworth Councils

Tel: 020 8891 7364

E-mail: [andrea.kitzberger@richmond.gov.uk](mailto:andrea.kitzberger@richmond.gov.uk)

Section of Plan	Council comments	Changes required	Forum Response
<b>List of figures and images</b>			
List of figure and images	<p><b>LBRuT Comment – 17.07.17:</b></p> <p>There are a number of images listed in this document that were not included in the Pre-Submission version. We recommend that these are included, as they will particularly benefit Chapter 2 (Character and Heritage).</p>	<p><b>17.07.17:</b></p> <p><i>Essential:</i> Ensure that listed images are included in revised layout.</p>	All images will be included in the submitted Plan
<b>Introduction</b>			
Vision	<p><b>LBRuT Comment – 10.03.17:</b></p> <p>This is a very limited vision, i.e. to retain the identity of Ham and Petersham. For example, the area is relatively isolated, there are limited local employment opportunities, with traffic being a major problem in the area. The vision could be more ambitious in terms of trying to address some of those problems and key issues that you have identified, rather than simply retaining the identity of Ham and Petersham.</p> <p>We also recommend changing the description from ‘semi-rural’ to something that better reflects the location of Ham and Petersham within Greater London. It may be more appropriate to use ‘relatively isolated’.</p> <p><b>LBRuT Comment – 17.07.17:</b></p> <p>This is now a much clearer vision for the future of the area, and it is helpful in guiding the policies that follow. As discussed during our meeting on the 03/05/17, the Council recognises the importance that the Forum places on the description of the area as ‘semi-rural’ and notes the local evidence and justification, particularly the residents’ perception of the area.</p>	<p><b>10.03.17:</b></p> <p><i>Essential:</i> use alternative wording to ‘semi-rural’</p> <p><i>Desirable:</i> expand on the vision and consider addressing key issues within it and how the area should develop within the next 15 years</p> <p><b>17.07.17:</b></p> <p><i>Essential:</i> Amend the wording of the final paragraph to ensure that the vision is aspirational – see example text.</p>	<p>The phrase ‘semi-rural’ has been used to describe the landscape setting of the settlements of Ham and Petersham within substantial areas of open and undeveloped land which is a distinctive feature of the neighbourhood area and one reason for its relative isolation from the urban area of Greater London. We understand the ward has the second highest proportion of open land of all wards in Greater London. The description reflects the strongly held perception of residents revealed throughout the consultation. It is consistent with the description of adjoining areas of Richmond and Twickenham as ‘villages’</p> <p>Our vision for a sustainable community is that residents will have access to education, shopping and cultural opportunities within the area, where this is viable, to foster the</p>

Section of Plan	Council comments	Changes required	Forum Response
	<p>The Council recommends the following changes:</p> <p>“Our vision for a sustainable community is that, <del>whenever viable,</del> residents will have access to education, shopping and cultural opportunities...”</p> <p>The introduction of viability suggests financial limitations and is considered inappropriate. Remember, the vision should be aspirational – all residents should have access to these opportunities!</p> <p>“Many of these local journeys will be on foot or bicycle...”</p> <p>No journeys have previously been referred to, so ‘the’ is considered to be more appropriate.</p> <p>“The <del>description of the</del> neighbourhood area <del>as</del> <b>is considered to be</b> ‘semi-rural’. <del>This also</del> reflects the strongly held perception of residents revealed throughout the consultation and <del>has been used to</del> describes the landscape setting of the settlements of Ham and Petersham within substantial areas of open and undeveloped land. This is a distinctive feature of the neighbourhood area which is highly valued by residents and visitors, <del>although it results in relative isolation from the urban area of Greater London.”</del></p> <p>The vision should be aspirational, whereas the final clause suggests an issue.</p>		<p>sense of belonging and identity which emerged in the consultation and that this will be complemented by convenient and efficient access to opportunities, including employment, in adjacent centres (Kingston, Richmond and Twickenham) and further afield. The reference to a ‘mixed residential community’ is to the range of social groups living in the area which emerged as a valued characteristic in the consultation.</p> <p>Vision statement expanded and explanatory paragraph added to Introduction</p> <p>17. 7 17 Suggested revisions accepted.</p>
<p>Paragraph 1.8.6</p>	<p><b>LBRuT Comment – 10.03.17:</b></p> <p>The Plan 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><b>10.03.17:</b></p> <p><i>Essential:</i> ensure the Plan does not only focus on meeting needs of existing residents</p>	<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. The Context section in the Housing chapter (3.2) sets out the constraints</p>

Section of Plan	Council comments	Changes required	Forum Response
	<p><b>LBRuT Comment – 17.07.17:</b></p> <p>Agree with proposed change although we note that this has still to be added to the latest version dated 22/06/17.</p>	<p><b>17.07.17:</b></p> <p><i>Essential:</i> Make change as the Forum proposed.</p>	<p>governing the scope for new development which are amplified in respect of individual sites in the Opportunities for Change chapter. 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> <p>17.7 17 Change incorporated</p>
<b>Section 2 – Character and Heritage</b>			
General comments	<p><b>LBRuT Comment – 10.03.17:</b></p> <p>The Council welcomes in principle this section, although overall it is quite brief and does not contain much detail. Providing details on neighbourhood character areas in Appendix 4 fits generally well with the overall Village Plan SPD approach elsewhere in the borough (<i>see further comments below</i>).</p> <p>The Plan generally deals with the non-conservation areas of Ham &amp; Petersham, and projects which do include the conservation areas. The conservation areas were covered in detail in the Character Appraisal &amp; Management Plan, and the conservation area study for most of the area is more recent than most CA studies, produced in 2007. However this is different to the other village plans and the approach may need to be further clarified.</p>	<p><b>10.03.17:</b></p> <p>N/A</p>	<p>Noted – greater prominence given to Character and Context Appraisals in main text and stronger link to design policies in Local Plan</p>
Character and Heritage – general	<p><b>LBRuT Comment – 10.03.17:</b></p> <p>There is a lack of photos and visuals, particularly within this section, which could make the Plan more readable, and also provide examples of local characteristics, materials and good practice, as well as</p>	<p><b>10.03.17:</b></p> <p><i>Desirable:</i> incorporate more photos and visuals to help describe the</p>	<p>Agreed</p>

Section of Plan	Council comments	Changes required	Forum Response
	<p>guidance on shopfronts, front gardens and parking. It would be beneficial if this aspect was added to the Plan.</p> <p><b>LBRuT Comment – 17.07.17:</b></p> <p>See above comment on the ‘List of figures and images’. The Council welcomes that these will be now be included.</p>	<p>character of the area.</p> <p><b>17.07.17:</b></p> <p><i>Essential:</i> Make changes as proposed.</p>	<p>17.7 17</p> <p>Included in submission version of Plan</p>
Map 3	<p><b>LBRuT Comment – 10.03.17:</b></p> <p>There are conservation areas missing from Map 3 Character and Heritage:</p> <ul style="list-style-type: none"> <li>• Star &amp; Garter/ Petersham Common area;</li> <li>• Parkleys Estate;</li> <li>• Section of Ham Lands opposite Teddington Lock;</li> <li>• Front gardens area Church Road.</li> </ul> <p>The light green tone (e.g. Ham Lands) does not appear in the Key. These omissions are essential to correct.</p> <p>There may be an attempt to put too much on this map; an additional map would help, which could also show other designations, such as Registered Park &amp; Garden and the Thames Policy Area.</p> <p><b>LBRuT Comment – 17.07.17:</b></p> <p>Proposed division of content between the new maps is welcomed. Ensure that all references to the former Map 3 within the chapter now reference the correct map.</p>	<p><b>10.03.17:</b></p> <p><i>Essential:</i> ensure all conservation areas are covered in Map 3 and that the correct key is used</p> <p><i>Desirable:</i> consider an additional map</p> <p><b>17.07.17:</b></p> <p><i>Essential:</i> Update references to the former Map 3 and incorporate within Maps 3a and 3b.</p>	<p>Comments accepted. The map will be divided into two maps with corrections.</p> <p>Map 3a CA’s and Reg landscapes and listed bldgs. Archaeological priority areas.</p> <p>Map 3b Character Areas and Thames Policy Area</p> <p>17.7 17</p> <p>Maps revised</p>
Paragraphs 2.2.7 – 2.2.10	<p><b>LBRuT Comment – 10.03.17:</b></p> <p>These paragraphs are not very clearly laid out regarding existing</p>	<p><b>10.03.17:</b></p> <p><i>Essential:</i> remove</p>	<p>Accepted – remove comment on whether the studies are now outdated.</p>

Section of Plan	Council comments	Changes required	Forum Response
	<p>conservation area studies. The Plan should provide planning guidance rather than comment on whether existing studies are considered dated, as in paragraph 2.2.8, as this may date restrict the longevity of the Plan itself.</p> <p><b>LBRuT Comment – 17.07.17:</b></p> <p>Proposed changes welcomed, including new text for paragraph – which clarifies that the HPNP does not seek to place further (local-level) guidance on the CAs.</p>	<p>commentary on whether existing studies are dated, and focus on providing planning guidance</p> <p><b>17.07.17:</b></p> <p><i>No further changes needed.</i></p>	<p>New para 2.2.10</p> <p><i>The Neighbourhood Plan does not seek to supplement the existing Conservation Area Appraisal and Management Plans which will be kept relevant by regular reviews to reflect changes and new opportunities. The Implementation Programme includes the proposal to review the Conservation Area Appraisals and Management Plans for the Petersham, Ham House, Ham Common and Parkleys Conservation Areas.</i></p>
<p>Policy C1 Protecting Green Character</p> <p>Paragraph 2.3.1</p>	<p><b>LBRuT Comment – 17.07.17</b></p> <p>Proposed changes generally welcomed, except replacement of ‘appropriate’ with ‘necessary’. Consider that ‘appropriate’ is more positive, and implies fitting in with the surroundings.</p>	<p><b>17.07.17:</b></p> <p><i>Desirable:</i> replace ‘appropriate’ in text.</p>	<p><i>Accepted</i></p>
<p>Policy C1 Protecting Green Character</p> <p>Paragraph 2.3.2</p>	<p><b>LBRuT Comment – 10.03.17:</b></p> <p>In referring to creation of or expansion of leisure facilities on green spaces, we are concerned that this could be misinterpreted – an applicant may use this statement to justify built development on green spaces, including indoor sport facilities; the Council recommends stronger alignment to the wording of the relevant policies within the Local Plan, particularly LP 31.</p> <p><b>LBRuT Comment – 17.07.17:</b></p>	<p><b>10.03.17:</b></p> <p><i>Essential:</i> remove ambiguity and make the policy clear that built development is generally inappropriate on green spaces.</p> <p><b>17.07.17:</b></p>	<p>Policy C1 aims to safeguard the essentially natural and undeveloped character of the open spaces. A number of leisure facilities are located within these areas and the purpose of this policy is to ensure that any future development on these sites is in keeping with the character of the surrounding land.</p>



Section of Plan	Council comments	Changes required	Forum Response
	<p>Proposed change welcomed, although for clarity we recommend the following changes:</p> <p>“The improvement, extension or renewal of <b>existing</b> leisure facilities within the green spaces of the neighbourhood area must have particular regard to their semi-rural setting within the open spaces when assessed in relation to the <b>relevant policies</b> policy in the Richmond Local Plan.</p> <p>The latter change is recommended as it is not clear which policy you intend to refer to. We suggested reference to LP31 in our previous comments, although LP 1 and LP 12 could also apply. The text we have suggested is intended to provide flexibility.</p>	<p><i>Essential:</i> make reference to ‘existing’ facilities clear and ensure correct reference to LP policies.</p>	<p>Suggested wording para 2.3.2 <i>The improvement, extension or renewal of leisure facilities within the green spaces of the neighbourhood area must have regard to their semi-rural setting within the open spaces when assessed in relation to policy LP1 in the Richmond Local Plan.</i></p> <p>17.7 17 Revised wording accepted</p>
<p>Paragraph 2.3.4</p>	<p><b>LBRuT Comment – 17.07.17:</b></p> <p>See our comment from 10.03.17 on paragraph 2.3.2 (above). We feel that this paragraph is also at risk of being misinterpreted. Amend text as follows:</p> <p>“All applications on or adjacent to green spaces identified in Map 8 will be expected to address this policy. The creation and expansion of sports facilities will only be considered appropriate on open spaces already used for this purpose, <b>and provided that criteria set out in the policies of this Plan and the Local Plan are met</b>”.</p>	<p><b>17.07.17:</b></p> <p><i>Essential:</i> make changes as proposed.</p>	<p>Revised wording accepted</p>
<p>Policy C3 – Protecting the Character of Built Areas Paragraph 2.5.1</p>	<p><b>LBRuT Comment – 10.03.17:</b></p> <p>The statement “All new development will be expected to have regard to its context in terms of scale, height, density, form and appearance.” is not a policy but a statement, particularly due to the reference of ‘to</p>	<p><b>10.03.17:</b></p> <p><i>Essential:</i> re-word this policy to ensure it is a policy and not a</p>	<p>It is accepted that policy LP1 provides comprehensive criteria against which to assess new development. Policy LP1 only refers to village plans and other SPD’s. The Neighbourhood</p>

Section of Plan	Council comments	Changes required	Forum Response
	<p><i>have regard to</i>'. We recommend considering the Council's Local Plan policy LP 1, and then to decide whether there is anything in addition to this policy that the Neighbourhood Plan might be seeking to address.</p> <p>Need to add '<i>materials and landscape</i>' to '<i>in terms of...</i>'.</p> <p><b>LBRuT Comment – 17.07.17:</b></p> <p>Proposed changes welcome. This now serves as a policy that is specific to the NP area.</p>	<p>statement</p> <p>Add '<i>materials and landscape</i>'</p> <p><b>17.07.17:</b></p> <p><i>No further changes needed.</i></p>	<p>Plan must link policy LP1 to the neighbourhood character assessments.</p> <p>Policies C2 and C3 have been brought together and now link to Local Plan Policy LP1</p>
<p>Policy C4 Routes – Paragraph 2.6.1 and 2.6.2</p>	<p><b>LBRuT Comment – 10.03.17:</b></p> <p>Whilst the principle of this policy is supported in terms of achieving permeability of the area and not accepting gated developments, the policy could potentially restrict the re-provision of routes if for example an existing route is not appropriate and there may be a way of achieving improvements in permeability by amending existing routes.</p> <p><b>LBRuT Comment – 17.07.17:</b></p> <p>Proposed change welcome.</p>	<p><b>10.03.17:</b></p> <p><i>Essential:</i> re-word the policy to also allow for amendments of existing routes provided that overall there is an improvement in permeability</p> <p><b>17.07.17:</b></p> <p><i>No further changes needed.</i></p>	<p>Additional sentence</p> <p><i>The realignment of paths and through routes will be acceptable where this will result in an improvement in permeability.</i></p> <p><i>[note revision to 9.9.1 relating to Ham Close to recognise the exceptionally permeable nature of the existing estate layout]</i></p>
<b>Section 3 Housing</b>			
<p>Paragraph 3.2.6</p> <p>(Paragraph 3.2.5 in the revised version)</p>	<p><b>LBRuT Comment – 10.03.17:</b></p> <p>This states "Affordable housing as a proportion of the total housing stock in the Neighbourhood area should fall no lower than the existing level of 18%". The source of this figure is not clear (also paragraph 1.8.3 is not clear in this respect).</p>	<p><b>10.03.17:</b></p> <p><i>Essential:</i> amend the policy to ensure it is in accordance with Publication Local Plan LP</p>	<p>Policy H3 has been amended to accord with Local Plan policies LP35 and LP36.</p>

Section of Plan	Council comments	Changes required	Forum Response
	<p>The Council suggests it should be noted that the percentage of affordable housing in the area cannot be controlled solely by the planning system. Affordable homes will continue to be lost through the rights of existing social housing tenants to acquire their homes through Preserved Right to Buy or Right to Acquire. The Council’s view is the Plan should set out that development proposals should seek to avoid a net loss of affordable housing and seek to provide additional affordable housing in line with Local Plan policies LP 35 and LP 36.</p> <p><b>LBRuT Comment – 17.07.17:</b></p> <p>Suggest you refer to Local Plan policy LP 36 as this is the one that focuses on Affordable Housing (LP 35 is important too, but concerns ‘Housing Mix and Standards’).</p> <p>“The Neighbourhood Forum supports the LBRuT’s approach to affordable housing as set out in Policy LP <del>35</del> <b>36</b> of the Richmond Local Plan Publication...”</p> <p>Suggest adding the text “of the total housing stock” to clarify that the percentage cited does not refer to a proportion of units in new developments, which would be contrary to LP 36 (A). It will still need to be demonstrated that this is based on evidence and a target that can realistically be monitored and implemented; there is a risk it could be seen as contrary to Policy LP36 on site specific applications.</p> <p>“However, in Ham and Petersham neighbourhood area a strategic balance in the region of 20% affordable housing <b>of the total housing stock</b> should be sought...”</p> <p>For context, at our last meeting we discussed the housing land supply</p>	<p>35 and LP 36</p> <p><b>17.07.17:</b></p> <p><i>Desirable:</i></p> <p>Reference LP 36 in the new paragraph 3.2.6</p> <p><i>Essential:</i></p> <p>Amend text in reference to 20% to clarify this is not contrary to LP 36 (A), and demonstrate evidence base.</p>	<p>Accepted</p>

Section of Plan	Council comments	Changes required	Forum Response
	<p>figures for the Ham, Petersham and Richmond Riverside ward and promised to further update you –the Council has recently published the <a href="#">2015/16 Housing AMR</a> which identifies 285 units for the ward over a 10-year period (from 2017-2027).</p>		
<p>Paragraph 3.2.9</p>	<p><b>LBRuT Comment – 17.07.17:</b></p> <p>Please refer to the general comments on density, which clarify that density should not inform a scheme but should be the output of considering a whole range of other factors and criteria.</p> <p>Recommend changes as follows:</p> <p>“Any housing development will need to have regard to the poor public transport accessibility and limited local highway capacity <b>as well as other characteristics of the site and surrounding area</b> when determining the appropriate housing density.”</p>	<p><b>17.07.17:</b></p> <p><i>Essential:</i> make changes to account for other characteristics of the sites and surrounding area.</p>	<p><i>Accepted</i></p>
<p>Policy H1 – Residential Development (Paragraphs 3.3.2 and 3.3.4)</p>	<p><b>LBRuT Comment – 10.03.17:</b></p> <p>The Council is concerned that paragraph 3.3.2 and 3.3.4 are too specific and go far beyond the requirements of the Local Plan policy LP 44. No evidence has been provided to justify this local policy approach and this will be required as part of complying with the ‘basic conditions’.</p> <p>The London Plan and Mayor’s Housing SPG are clear that the density levels specified therein are for guidance only; development above these densities may be appropriate subject to being tested against a number of relevant considerations. The policy implies that if an applicant proposes major or higher density residential development, this will only be appropriate if it increases the PTAL of an area. This could be seen as setting barriers to any larger development in the</p>	<p><b>10.03.17:</b></p> <p><i>Essential:</i> the policy needs to be amended to ensure it is in conformity with higher-level planning policies</p>	<p>This policy is concerned with the identification of housing sites in the neighbourhood area and the mitigation of potential transport related issues to enable and acceptable development to proceed.</p> <p>Policy H1 has been amended so that transport issues arising from a relevant development will be identified through the preparation of a Transport Assessment and Travel Plan and mitigation measures agreed with relevant authorities. The delivery of these mitigation measures be</p>

Section of Plan	Council comments	Changes required	Forum Response
	<p>area. Therefore, linking major / higher density development only to PTAL is a very limited view, and disregards the context, existing neighbourhood and setting of an area to determine what development and density may be appropriate.</p> <p>The policy should be amended to reflect a broader consideration of density, and that PTAL is only part of that.</p> <p><b>LBRuT Comment – 17.07.17:</b></p> <p>Please note that the language used here with reference to ‘Travel Plans’ should be revised to incorporate the correct terminology. See our comments (17/07/17) under Policy T1 for more details. We suggest the following revisions:</p> <p>3.3.1:</p> <p>“Any mitigating measures identified in <b>Transport Assessments or Travel Plans</b> for major housing schemes prepared in accordance with policy T1 (para 4.3) must be implemented prior to occupation or within an agreed timeframe.”</p> <p>More generally, whilst we note that the London Plan density matrix sets out a range of 150-200 habitable rooms per hectare (hrh) for suburban areas with a PTAL of 0-1, it is not clear what mitigation measures this policy is seeking? It would be better to expand Policy T1 on Travel Planning rather than purely focusing on transport issues within the Residential Development policy.</p> <p>Finally, under paragraph 3.3.5, the references should be made to SA 15 (Ham Close), SA 16 (Cassel Hospital), and SA 17 (St Michael’s Convent). SA 14 now refers to Kneller Hall, in Whitton.</p>	<p><b>17.07.17:</b></p> <p><i>Essential:</i> correct language with reference to Transport Assessments and Travel Plans.</p> <p><i>Desirable:</i> consider the relevant mitigation measure being required, and whether this is better included within policy T1.</p> <p><i>Essential:</i> correct SA reference.</p>	<p>necessary if the development is to proceed.</p> <p>17.7 17</p> <p>The requirement for Transport Assessments and Travel Plans is now included in the chapter on Travel and Streets</p>

Section of Plan	Council comments	Changes required	Forum Response
<p>Policy H1 and specifically paragraph 3.3.5</p>	<p><b>LBRuT Comment – 10.03.17:</b></p> <p>It should be noted that all developments with new floorspace are required to contribute to CIL, and thus developments will already make a contribution towards, e.g. transport; therefore, a developer could say they already contribute to transport by paying CIL to the Council, which in turn can be spent on transport projects. The content of planning obligations including improvement of public transport links can be determined on a case by case basis with reference to relevant planning obligation policies.</p> <p><b>LBRuT Comment – 17.07.17:</b></p> <p>Proposed change welcomed.</p>	<p><b>10.03.17:</b></p> <p><i>Essential:</i> the policy needs to be amended to ensure it is in conformity with higher-level planning policies</p> <p><b>17.07.17:</b></p> <p><i>No further changes needed</i></p>	<p>Policy T1 requires a travel plan to be submitted for all developments of more than 10 units which would identify transport measures required to make the development acceptable. Amend Policy H1 to cross reference to Policy T1 and include a reference to implementation of identified measures being funded through CIL (borough projects) and / or direct contributions.</p>
<p>Policy H2 – Housing mix</p>	<p><b>LBRuT Comment – 10.03.17:</b></p> <p>The Council is concerned that paragraph 3.4.1 sets an unduly prescriptive approach as to the unit sizes to be achieved. Reference to 10 and 20 units is also arbitrary.</p> <p>Paragraph 3.2.7 refers to expecting a mix of sizes of units, taking into account neighbourhood and local housing need.</p> <p>The Council’s view is that it may not be necessary to be overly prescriptive in paragraph 3.4.1. The Local Plan Policy LP 35 is not specific as to unit sizes – this is to be determined by the characteristics of the locality.</p> <p><b>LBRuT Comment – 17.07.17:</b></p>	<p><b>10.03.17:</b></p> <p><i>Essential:</i> the policy needs to be amended to ensure it is in conformity with higher-level planning policies, including Local Plan policy LP 35</p> <p><b>17.07.17:</b></p>	<p>Accepted – Policy H2 has been amended accordingly</p>

Section of Plan	Council comments	Changes required	Forum Response
	<p>Changes made are welcomed. We feel that this is particularly important to ensure compliance with the basic conditions. However, it should be noted that this policy now serves only to repeat LP 35, which applies regardless. Is there a local aspect with regard to the housing mix that could justify the inclusion of this policy? Otherwise, it might be redundant.</p>	<p>Consider relevance of policy H2 – does it add anything to policy LP 35?</p>	<p>17.7 17</p> <p>The Forum considers this is an important issue and that it is desirable for this to be stated explicitly in the Neighbourhood Plan.</p>
<p>Policy H3 – Affordable Housing</p>	<p><b>LBRuT Comment – 10.03.17:</b></p> <p>The Council is concerned that paragraph 3.5.1, as with paragraph 3.4.1, should avoid being prescriptive about unit sizes which will be dependent on the affordable housing tenure mix and which will also be dependent on scheme viability on a case by case basis. Local Plan Policy LP35 does not specifically require larger family homes.</p> <p><b>LBRuT Comment – 17.07.17:</b></p> <p>Whilst the changes are welcomed, the new wording at the end of paragraph 3.5.1 might be misleading as it seeks provision as part of the development site – on site affordable housing is only required on large sites and former employment sites; on small sites financial contributions are sought. Clarification is required as to whether this is intended to take a different approach to LP36? If the intention is to repeat LP 36, then this policy may become redundant.</p>	<p><b>10.03.17:</b></p> <p><i>Essential:</i> the policy needs to be amended to ensure it is in conformity with higher-level planning policies, including Local Plan policy LP 36</p> <p><b>17.07.17:</b></p> <p><i>Essential:</i> Clarify and consider relevance of policy H2 – does it add anything to policy LP 36?</p>	<p>Accepted – Policy H3 has been amended in line with LP35 with provision for affordable housing to be provided on site.</p> <p>17.7.17</p> <p>The Forum accepts the argument that on site provision should only apply to developments of 10 or more units and has amended the Plan accordingly</p>
<p>Paragraph 3.5.1</p>	<p><b>LBRuT Comment – 10.03.17:</b></p> <p>The Council is concerned at the statement at paragraph 3.5.1 that “The balance of social and market housing in the neighbourhood area should be maintained.” As set out above in relation to comments on 3.2.6, this control may not be possible through planning, and could</p>	<p><b>10.03.17:</b></p> <p><i>Essential:</i> the statement needs to be removed/amended to ensure it is in conformity</p>	<p>It is accepted that national housing policy will result in the further transfer of social housing to the private sector and that the Neighbourhood Plan cannot dictate the proportion of social housing in the neighbourhood area.</p>

Section of Plan	Council comments	Changes required	Forum Response
	<p>suggest that Ham Close regeneration would be unacceptable (notwithstanding viability) if its viability was dependent on providing more than 50% market homes in the additional provision.</p> <p><b>LBRuT Comment – 17.07.17:</b></p> <p>See above, comment in relation to ‘Policy H3 – Affordable Housing’.</p>	<p>with higher-level planning policies, including Local Plan policy LP 35</p> <p><b>17.07.17:</b></p> <p><i>See above.</i></p>	<p>17.7 17</p> <p>See above</p>
Paragraph 3.5.2	<p><b>LBRuT Comment – 10.03.17:</b></p> <p>The Council is concerned at paragraph 3.5.2, as stated above in relation to paragraph 3.2.6.</p> <p><b>LBRuT Comment – 17.07.17:</b></p> <p>See above, comment in relation to ‘Policy H3 – Affordable Housing’.</p> <p>Please also note that there is a typo that should be addressed:</p> <p>“...housing options it will be necessary for new affordable housing to be included <u>d</u> on the sites identified for housing development.”</p>	<p><b>10.03.17:</b></p> <p><i>Essential:</i> amend the policy to ensure it is in accordance with Local Plan LP 35 and LP 36</p> <p><b>17.07.17:</b></p> <p><i>See above.</i></p> <p><i>Essential:</i> correct typo</p>	<p>As above</p> <p>17.7 17</p> <p>Corrected</p>
Policy H4 – Housing Standards	<p><b>LBRuT Comment – 10.03.17:</b></p> <p>Paragraph 3.6.1 encourages in all new housing ground floor homes to meet Building Regulations M4(3) wheelchair housing. This exceeds the requirements of national policy and Local Plan Policy LP 35, and therefore if the Forum continues to pursue this approach, strong evidence will be required to justify this approach as this could be unduly onerous and impact on schemes’ viability, particularly in relation to affordable housing.</p>	<p><b>10.03.17:</b></p> <p><i>Essential:</i> amend the policy to ensure it is in accordance with Local Plan LP 35</p> <p><i>Desirable:</i> consider definition for ‘new</p>	<p>The requirement for all new ground floor housing to be wheel chair accessible has been removed.</p> <p>References to housing for older people have been revised.</p>



Section of Plan	Council comments	Changes required	Forum Response
	<p>The Council questions the evidence base to demonstrate a lack of homes for older people (as stated at paragraph 3.6.2). This could be unduly onerous and impacts on scheme viability particularly in relation to affordable homes.</p> <p>Our understanding is that these higher optional Building Regulations can only be applied to new build housing, not conversions or change of use proposals. We have found the term ‘new housing’ can be misinterpreted, so this may need to be clarified.</p> <p><b>LBRuT Comment – 17.07.17:</b></p> <p>The changes appear to have unintentionally weakened the policy and may need to distinguish more clearly between the different standards – for space and inclusive access.</p> <p>As it now reads there would be no units required to M4(3), whereas LP35 seeks 10% to this standard – is this weakening intended? Note M4 (2) and M4 (3) cannot be applied to conversions or changes of use.</p> <p>The optional national Technical Standards also cover water efficiency standards and internal space standards.</p> <p>LP35 requires compliance with the internal space standards – the Nationally Described Space Standard. The supporting text acknowledges if there is a shortcoming in residential standards they need to be justified.</p> <p>Note also that it still may be beneficial to clarify the term ‘new housing’, see the third paragraph of our comment on 10.03.17, above.</p>	<p>housing’</p> <p><b>17.07.17:</b></p> <p><i>Desirable:</i></p> <p>Consider defining the term ‘new housing’.</p> <p><i>Essential:</i></p> <p>Clarify further and connect policy to a supporting evidence base.</p>	<p>The application of the policy to conversion schemes and extensions has been clarified</p> <p>17.7 17</p> <p>The HPNP has been revised to accord with LP 35 in the Richmond Local Plan</p>

Section of Plan	Council comments	Changes required	Forum Response
	<p>For context, at our last meeting we discussed the need to distinguish the type and tenure of older person’s housing that may be encouraged. The Council's evidence includes the <a href="#">Extra Care Housing Evidence Base (2015)</a> and the <a href="#">Retirement Housing Review (2016)</a>. There are a myriad of products proposed by developers, thereby LP37 seeks to establish whether a proposal will be meeting genuine priority local needs.</p>		
<p>Policy H5 – Design principles for housing development</p>	<p><b>LBRuT Comment – 10.03.17:</b></p> <p>The Council is concerned at the approach to setting maximum habitable rooms per hectare, directly linked with PTAL, which is different from the approach taken elsewhere in the borough, and therefore we consider that this is not in general conformity with Local Plan policies LP 1 and LP 2. A strong evidence base would be required in order for the Forum to justify this approach. Density standards should not be applied rigidly – clearly Petersham Road has a much different low density character (with Conservation Area protection) compared with Ham Close – but 250 hrh/ha will surely be inappropriate in the local context notwithstanding the higher PTAL rating. Setting a non-flexible threshold such as 200 or 250 hrh may not allow maximisation of use of brownfield land, and the Council feels it should be the context, character and setting of an area, buildings and spaces that determine the appropriate densities.</p> <p><b>LBRuT Comment – 17.07.17:</b></p> <p>The second sentence relating to housing density should be deleted:</p> <p><del>“...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</del></p>	<p><b>10.03.17:</b></p> <p><i>Essential:</i> amend the policy to ensure it is in accordance with Local Plan LP 1 and LP 2</p> <p><b>17.07.17:</b></p> <p><i>Essential:</i> Make changes as proposed.</p>	<p>The Neighbourhood Plan seeks to promote housing development which is appropriate to the character and context of the neighbourhood area having regard to both the scale and appearance of existing development, the relative isolation and restricted public transport and the capacity of the road network.</p> <p>The policy has been revised to clarify this objective in order to promote appropriate development of the identified housing sites.</p> <p><b>17.7.17</b></p> <p>The sentence in question has been revised to read:</p> <p><i>Schemes in excess of the density range identified in the London Plan</i></p>

Section of Plan	Council comments	Changes required	Forum Response
	<p><del>scheme complies with all the policies of the Neighbourhood Plan.</del></p> <p>Please refer to the general comments on density. Note that the London Plan and Housing SPG make clear that the density ranges are for guidance and a starting point only; however, they should not be used as determining factors. If the Forum feels strongly to include a reference to density, we would recommend the following:</p> <p>“Schemes may exceed the density range identified within the London Plan density matrix, providing that important qualitative concerns in relation to design and character are suitably addressed.”</p>		<p><i>density matrix (up to 200hrh) must demonstrate that they have addressed concerns related to design, character and accessibility.</i></p>
<p>Paragraph 3.7.2 Criteria (1) and (2)</p>	<p><b>LBRuT Comment – 10.03.17:</b></p> <p>The references in paragraph 3.7.2 criteria (1) and (2) to exemplary design could suggest an unreasonably high standard compared with ‘high’ in Local Plan policy LP 1, again imposing cost implications on new housing (particularly affordable).</p> <p>Building heights will be a consequence of accepting higher density development if justified (see comments on paragraph 3.3.4 above). The supporting text to the policy should acknowledge that there are already areas within Ham, i.e. Ham Close, with existing block heights up to five storeys. Criterion (2) could therefore be overly restrictive and it is recommended to adopt an approach similar to that set out in policy LP 1 in this regard.</p> <p><b>LBRuT Comment – 17.07.17:</b></p> <p>We would like to reiterate the second point from our comments made on 10.03.17. It should be acknowledged that Ham Close also already has building heights of 5 storeys. Ideally, this should be included as part of point 2, under paragraph 3.7.2. It could, however, also form</p>	<p><b>10.03.17:</b></p> <p><i>Essential:</i> amend ‘exemplary’ design and align with Local Plan policy LP 1, i.e. ‘high architectural design quality’ and acknowledge that there are very few areas with buildings taller than 4 storeys, i.e. Ham Close</p> <p><b>17.07.17:</b></p> <p><i>Essential:</i> Acknowledge that Ham Close has areas with existing block heights up to five storeys.</p>	<p>The paragraph has been revised to conform with Local Plan policy LP2 which states:- <i>resist buildings that are taller than the surrounding townscape other than in exceptional circumstances, such as where the development is of high architectural design quality and standards, delivers public realm benefits and has a wholly positive impact on the character and quality of the area;</i></p> <p>The Neighbourhood Plan has also been revised to clarify the application of the policy when buildings are demolished in order for development to proceed.</p> <p>Para 3.7.2.(2) is considered to be in conformity with the Richmond Local Plan PolicyLP2 and the supporting commentary in the Local Plan. There are numerous references to the</p>

Section of Plan	Council comments	Changes required	Forum Response
	part of the Reasoned Justification.		<p>height of the existing blocks in the Character Area Appraisal for Ham Close.</p> <p>17.7.17</p> <p>It is considered that references to the height of some of the buildings on Ham Close are more appropriate to the sections of the Plan relating to that site rather than the policies etc for the complete Neighbourhood Area.</p>
Paragraph 3.7.2 Criterion (3)	<p><b>LBRuT Comment – 10.03.17:</b></p> <p>The Council considers that the statement in relation to considering reduced private open space should be amended and aligned with Local Plan Policy LP 35 (Housing Mix and Standards) as this sets out the Council’s external space standards, which are expected to be met in new housing development.</p> <p><b>LBRuT Comment – 17.07.17:</b></p> <p>Proposed changes welcomed.</p>	<p><b>10.03.17:</b></p> <p><i>Essential:</i> amend criterion 3 to ensure this is in conformity with LP 35</p> <p><b>17.07.17:</b></p> <p><i>No further changes needed.</i></p>	The precedent is already established in the area but agree.
Paragraph 3.7.2 Criterion (5)	The Council is concerned that the reference to considering reduced overlooking distances could be misinterpreted. It is not clear if this is about existing occupiers (i.e. properties affected by new development) or future occupiers (i.e. within new build schemes). It	<i>Essential:</i> amend criterion 5 to ensure this is in conformity with LP 8	The reference to overlooking distances has been removed from the plan.

Section of Plan	Council comments	Changes required	Forum Response
	<p>should reference Local Plan Policy LP 8 on Amenity and Living Conditions, which set out clear requirements for minimum distances.</p> <p><b>LBRuT Comment – 17.07.17:</b></p> <p>Proposed changes welcomed.</p>	<p><b>17.07.17:</b></p> <p><i>No further changes needed.</i></p>	
Paragraph 3.7.5	<p><b>LBRuT Comment – 17.07.17:</b></p> <p>Delete the text “relatively isolated nature of the area expressed by the low” as this does not add anything to the policy, particularly as the Neighbourhood Plan in its current format only refers to the density range/maximum set out within the London Plan density matrix. See also the general comments on density above.</p> <p>“The proposed density standards reflect both the character of existing housing in the area and the <del>relatively isolated nature of the area expressed by the low</del> PTAL.”</p> <p>Please note this sentence should be moved to the relevant section with Chapter 4. Travel and Streets. See notes on paragraph 4.3.1.</p>	<p><b>17.07.17:</b></p> <p><i>Essential:</i> Make changes as recommended.</p>	<p>This paragraph relates to the final sentence of para 3.7.3 and has been revised to read:</p> <p><i>3.7.5 The reference to density range contained in the London Plan relates to the character of existing housing in the area, the PTAL and the capacity of the road network.</i></p>
<b>Section 4 – Travel and Streets</b>			
Paragraph 4.2.6	<p><b>LBRuT Comment – 10.03.17:</b></p> <p>The towpath is deliberately unlit for biodiversity reasons.</p> <p><b>LBRuT Comment – 17.07.17:</b></p> <p>Proposed changes welcomed.</p>	<p><b>10.03.17:</b></p> <p><i>Desirable:</i> add reference that the towpath is unlit for biodiversity reasons</p> <p><b>17.07.17:</b></p> <p><i>No further changes</i></p>	<p>Reference to be added to note that any lighting would need to be sensitive to the aim to support biodiversity.</p>

Section of Plan	Council comments	Changes required	Forum Response
		<i>needed.</i>	
Policy T1	<p><b>LBRuT Comment – 10.03.17:</b></p> <p>The requirement for a 10 unit residential development to produce a Travel Plan is considered too onerous. However, development would be required to provide excellent cycle storage and if appropriate funding towards improvements of walking and cycling routes. For information, Travel Plans for such small schemes would be time intensive and would very likely not achieve much in terms of mode shift to sustainable transport. Each development would have to be assessed on its own merits as to whether a Travel Plan would be required.</p> <p>Car Club providers do not usually like on site provision as more often than not it is not accessible to other local car club members. Car club provision on site that is open and accessible to all resident members in the locality would be welcomed but only if there is a need for additional car club spaces in that locality.</p> <p><b>LBRuT Comment – 17.07.17:</b></p> <p>The terminology being used in this section is not accurate. A ‘Transport Statement’ is required on developments of less than 10 units; a ‘Transport Assessment’ is required on development of 10 or more units; and a ‘Travel Plan’ is required on major schemes only. Propose the following changes to account for this:</p> <p>“4.3.1 Housing Developments of <del>more than</del> 10 units <b>or more</b> will be required to:</p>	<p><b>10.03.17:</b></p> <p><i>Essential:</i> amend the policy to ensure it is in accordance with Local Plan LP 44</p> <p>Recommendation:</p> <ul style="list-style-type: none"> <li>change criterion (1) to ‘developments will be expected to provide adequate off-street parking and cycle storage to minimise street impacts’.</li> <li>change criterion (2) to ‘provide parking for car club vehicles, preferably off-street’</li> </ul> <p><b>17.07.17:</b></p> <p><i>Essential:</i> make changes to accurately reflect the difference between Transport Assessments and Travel Plans, and to use correct terminology.</p> <p><i>Desirable:</i> consider including reference to low PTAL values within</p>	<p>We understand that major development is 10 or more units.</p> <p>We note that The London Plan policy 6.3 states that: Transport assessments will be required in accordance with TfL's <u>Transport Assessment Best Practice Guidance</u> for major planning applications.</p> <p>The HPNP policy T1 is supported by TfL and they advise that Travel Plans should follow the guidelines of ATTrBuTE assessment.</p> <p>Local Plan also requires a transport assessment for major developments.</p> <p>Given the particular circumstances referred to in response to H1 and H5 HPNF consider that travel plans and the associated targets are particularly important in this area.</p> <p>17.7.17</p> <p>Revisions accepted</p>

Section of Plan	Council comments	Changes required	Forum Response
	<p>1. <del>include</del> <b>undertake</b> a <del>travel</del> <b>Transport Assessment, and where required a or Travel Plan</b> for developments exceeding the threshold, which should be produced in accordance with TfL best practice. The <b>assessments and</b> plans should make sustainable and implementable proposals for mitigating the transport impacts of the development <b>to take account of the generally low PTAL values in the area.</b>"</p> <p>It is also noted that no mention of Transport Assessments is made within the Policy Application (paragraph 4.3.2). This should be amended so that it aligns with the Policy:</p> <p><b>"Transport Assessments and</b> Travel Plans should deliver positive contributions to an integrated cycling network in the area. Cycling infrastructure should be coherent, direct, attractive, safe, comfortable, adaptable, and appealing to a variety of users and designed to TfL London Cycling Design Standards (LCDS). <b>Transport Assessments and</b> Travel Plans should also, where appropriate, support improvements to the quality, accessibility and capacity..."</p> <p>These changes should be reflected in paragraph 4.3.3 also:</p> <p>"4.3.3 Major developments will be expected to be accompanied by a <del>travel</del> <b>Transport Assessment</b> or <b>Travel Plan</b> identifying and setting out how the transport requirements generated by the development will be addressed in a sustainable way."</p>	<p>this section, rather than in paragraph 3.7.5.</p>	
<p>Paragraph 4.3.6</p>	<p><b>LBRuT Comment – 10.03.17:</b></p> <p>Whilst we agree in principle with this statement, car club space should not be instead of on site car parking to the required standards for the development. There are no Community Parking Zones in this area and therefore we cannot control car ownership by occupants. If no onsite</p>	<p><b>10.03.17:</b></p> <p><i>Essential:</i> clarify that car club space should not be instead of on site car parking within the</p>	<p>Agreed</p>

Section of Plan	Council comments	Changes required	Forum Response
	<p>parking then there is a risk that people will park on street.</p> <p><b>LBRuT Comment – 17.07.17:</b></p> <p>Proposed changes welcomed.</p>	<p>supporting text of the policy</p> <p><b>17.07.17:</b></p> <p><i>No further changes needed.</i></p>	
<p>Policy T2 – Improvements to transport infrastructure</p>	<p><b>LBRuT Comment – 10.03.17:</b></p> <p>The construction of a foot and cycle bridge linking Ham and Twickenham is referred to in Policy T2 (5) and the Implementation Programme in Appendix 3 refers to this as a ‘Short term’ priority. While this project has been recognised as an aspiration and vision within various Council’s plans and documents, it should be noted that this stage no feasibility studies have been undertaken and there is no funding in place to look at options and feasibility, nor funding any build costs. We therefore feel it is misleading to refer to it as ‘short term’, although we note that the Implementation Programme is not part of the NP.</p> <p><b>LBRuT Comment – 17.07.17:</b></p> <p>Proposed changes welcomed as they pertain to the Ham and Twickenham foot and cycle bridge.</p> <p>As a minor point, suggest editing new policy T2 (3) to read a little more strongly:</p> <p>“Improvements to support bus service, priority and design that aims to ensure reliability, a variability of bus services and improve connectivity.”</p>	<p><b>10.03.17:</b></p> <p><i>Essential:</i> refer to the bridge between Ham and Twickenham as ‘long term’</p> <p><b>17.07.17:</b></p> <p><i>Desirable:</i> suggested minor amendment to new text.</p>	<p>Noted. A feasibility or scoping study is considered to be the commencement of the bridge project and it is considered that this could commence within a year of the adoption of the Plan in 2018, that is within the financial year 2019 /20.</p> <p>The plan has been revised to refer to the initial feasibility stage.</p> <p>17.7.17</p> <p>Revised wording accepted</p>



Section of Plan	Council comments	Changes required	Forum Response
<p>Policy T3 – Cycle Storage</p>	<p><b>LBRuT Comment – 10.03.17:</b></p> <p>It is noted that the standards at paragraph 4.5.1 exceed higher cycle storage than the Council’s approach in Local Plan policy LP 45 which is as per the London Plan. The Council feels that London Plan cycling standards are already very ambitious and you will therefore be required to produce evidence to justify the higher standard.</p> <p><b>LBRuT Comment – 17.07.17:</b></p> <p>Please note that paragraph 4.5.1 does not conform to the standards of the Local Plan. Where policies in the Neighbourhood Plan demonstrate conflict with a policy from the Local Plan, the rationale for the approach taken and evidence to justify that approach must be demonstrated.</p> <p>Please note also that paragraph 4.5.3 non-conformity with the London Plan (which could, in theory, require more). As stated above, where policies demonstrate conflict with the London Plan, this approach and supporting evidence must be justified. We feel the policy could be more clearly written:</p> <p>“If more than four bedspaces are proposed, the maximum requirement remains at four cycle spaces.”</p>	<p><b>10.03.17:</b></p> <p><i>Essential:</i> evidence will be required to justify higher cycle parking standards</p> <p><b>17.07.17:</b></p> <p><i>Essential:</i> Consider non-conformity issues ensure supporting evidence can justify this approach.</p>	<p>The plan has been revised to require a maximum of four bike parking spaces per dwelling.</p> <p>17.7.17 Revised wording agreed</p>
<b>Section 5 – Community Facilities</b>			
<p>Paragraph 5.3.2</p>	<p><b>LBRuT Comment – 17.07.17:</b></p> <p>Proposed changes welcomed. This is more positive than the former wording.</p>	<p><b>17.07.17:</b></p> <p><i>No further changes needed.</i></p>	
<p>Policy CF 2 – Community</p>	<p><b>LBRuT Comment – 10.03.17:</b></p>	<p><b>10.03.17:</b></p>	<p>Add the following sentence to Policy CF2 – “When community facilities are</p>

Section of Plan	Council comments	Changes required	Forum Response
Facilities	<p>The Plan could clarify the policy approach in relation to the existing premises if a local community facility is relocated. For example if a GP surgery or other community facility moves into new premises, it could set out the approach with regard to the existing vacated premises.</p> <p><b>LBRuT Comment – 17.07.17:</b></p> <p>Proposed change welcomed. It might be worthwhile clarifying ‘community uses’, as this could potentially be open for interpretation. This could be done by referring explicitly to the D1 land use class (see previous recommendation under ‘Changes required’). It could also be suitably clarified in the neighbourhood plan’s ‘Glossary’.</p> <p>The use of the term ‘other’ also suggests this is preferable, when a similar use might be viable. Suggest rephrasing this sentence to read:</p> <p>“The extension or relocation of local community facilities will be supported, subject to the services provided being maintained or improved. When <b>there is no longer an identified community need for an existing</b> community facilities <b>use</b> or <b>when it is</b> relocated, primary consideration <b>will should</b> be given to using and adapting the vacated premises for other community uses”</p>	<p><i>Desirable:</i> Consider adding criteria that apply for existing vacated premises that still benefit from the D1 land use class once a service has relocated</p> <p><b>17.07.17:</b></p> <p><i>Desirable:</i> Suggested changes to clarify policy, as appropriate.</p>	<p><i>lost or relocated, primary consideration will be given to using and adapting the vacated premises for other community uses.”</i></p> <p>17.7.17</p> <p>Revised wording agreed</p>
Paragraph 5.4.3	<p><b>LBRuT Comment – 10.03.17:</b></p> <p>It may be useful to have elsewhere a section in the Plan / Implementation Plan on what CIL funding should be prioritised for, as this is not a policy matter. It needs to be clarified that this is in relation to the proportion that is Neighbourhood CIL, not the Strategic CIL, as the Council’s adopted CIL Regulation 123 List applies for the</p>	<p><b>10.03.17:</b></p> <p><i>Essential:</i> CIL funding and what projects are to be prioritised is not a policy matter and this should be moved to a different</p>	<p>Transfer para 5.4.3 to Appendix 5.</p>

Section of Plan	Council comments	Changes required	Forum Response
	<p>latter.</p> <p><b>LBRuT Comment – 17.07.17:</b></p> <p>Proposed change welcomed.</p>	<p>section outside of the Plan, such as within a stand-alone Appendix</p> <p><b>17.07.17:</b></p> <p><i>No further changes needed.</i></p>	
<b>Section 6 – Retail and Local Services</b>			
6.1 Objective	<p><b>LBRuT Comment – 17.07.17:</b></p> <p>Given that reference has been made to “the neighbourhood’s three local centres” in the chapter’s objective, it might be worth making clear in the supporting text where these are.</p> <p>Although it is implied in the following text, it is not made explicitly clear.</p>	<p><b>17.07.17:</b></p> <p><i>Desirable:</i> Clarify the three local centres identified in the revised objective.</p>	<p><i>New item</i></p>
Paragraph 6.4.2	<p><b>LBRuT Comment – 10.03.17:</b></p> <p>It is noted that this states “There is also a perception that Ham Parade is on the edge of two boroughs and that its health and vitality have been overlooked in favour of the town centres.” The Council has provided support, and it makes an annual funding provision of £2000 from the Town Centre Opportunities Fund and £1,500 from the Xmas fund to Ham Parade, although the co-ordination of activities and spending funding in part relies on the role of volunteers along with others.</p> <p><b>LBRuT Comment – 17.07.17:</b></p> <p>Changes accepted.</p>	<p><b>10.03.17:</b></p> <p><i>Essential:</i> remove the statement that Ham Parade has been overlooked in favour of the town centres as this is not a policy matter.</p> <p><b>17.07.17:</b></p> <p><i>No further changes</i></p>	<p>This statement provides a context and reflects the local perception. The sentence has been reworded to emphasise the importance of supporting local shopping centres.</p>

Section of Plan	Council comments	Changes required	Forum Response
		<i>needed.</i>	
Paragraph 6.4.4	<p><b>LBRuT Comment – 10.03.17:</b></p> <p>This states one of the priorities for Ham Parade is to “....support the creation of a ‘Ham Parade Management Group’ facilitated by a part time town centre manager or retained consultant providing a voice for Ham Parade and co-ordinated marketing / promotion. Possible sources of funding for this would be secured in discussion with LBRuT.” This is noted. It is understood that more recently, a new group has emerged, the Ham and North Kingston Community Investors, whose aim is to set up a Community Interest Company to lease at least one property in the area. The Council will explore working with this group and in the future may give them the opportunity to apply for the funding available.</p> <p><b>LBRuT Comment – 17.07.17:</b></p> <p>Reasoning noted and changes accepted.</p>	<p><b>10.03.17:</b></p> <p><i>Desirable:</i> it would be preferable to move this part into the non-planning section of the Plan, such as within the implementation section or an Appendix.</p> <p><b>17.07.17:</b></p> <p><i>No further changes needed.</i></p>	<p>This paragraph seeks to put forward a package of co-ordinated measures to secure the long term future of Ham Parade. Whilst we acknowledge that this is not strictly a planning proposal we consider it should remain as an important part of the overall package.</p>
Paragraph 6.8.2	<p><b>LBRuT Comment – 17.07.17:</b></p> <p>The new text that has been added within this section reads a little more like a policy than their supporting text. Consider that it might be made into ‘Policy R2 – Other Businesses and Local Services’. Paragraph 6.8.1 could then read as the justification.</p> <p>Please note also that we recommend the following clarifications to the text:</p> <p>“Facilities and services such as shared <u>work</u>-space and serviced<u>ed</u> offices</p>	<p><b>17.07.17:</b></p> <p><i>Desirable:</i> consider value of having a separate policy relating to other businesses and local services.</p> <p><i>Essential:</i> clarify text regarding shared work-spaces &amp; serviced offices</p>	<p>A new policy ‘R2 Other businesses and Local Services’ has been introduced and the rewording adopted.</p>

Section of Plan	Council comments	Changes required	Forum Response
	which would encourage and sustain..."		
<b>Section 7 – Green Spaces</b>			
Map 8	<p><b>LBRuT Comment – 10.03.17:</b></p> <p>Ensure the titles and keys are appropriate, for example, the school playing fields or the gardens of St Michael’s Convent are referred to as ‘public’ spaces. There should be more alignment with the Council’s definition as set out within the Proposals Map on what is a Public Open Space.</p> <p>We believe the following are incorrect on the map:</p> <ul style="list-style-type: none"> <li>• No 2 – add another 2 for the northern section for HCW’s</li> <li>• No 5 – is not both locations</li> <li>• No 19 – wrong place</li> <li>• No 7 – we believe this is called ‘The Copse’</li> <li>• No 10 – not marked on the map</li> </ul> <p><b>LBRuT Comment – 17.07.17:</b></p> <p>Proposed change welcome. Ensure map is updated as stated.</p>	<p><b>10.03.17:</b></p> <p><i>Essential:</i> make changes to the map as well as its key/legend as appropriate</p> <p><b>17.07.17:</b></p> <p><i>Essential:</i> Update map as proposed.</p>	<p>The second column in the key for Map 8 should be headed Private Open Space.</p> <p>The map will be corrected as suggested.</p> <p>Map to be updated for submitted Plan</p>
References to Ham Village Green	<p><b>LBRuT Comment – 10.03.17:</b></p> <p>The Council recommends that ‘Ham Village Green’ (in Green Spaces as well as the Opportunities for change section later in the Plan) is not referred to as ‘Village Green’ within the Plan. It is appreciated that this is what it is locally known as, it is recommended to refer to The Green or Ham Green only. The reason being that a ‘Village Green’ is a designation as set out in the Commons Act 2006, and using the reference ‘Village Green’ could lead to misinterpretation or imply a wrong designation when used in a development plan document.</p>	<p><b>10.03.17:</b></p> <p><i>Desirable:</i> replace ‘Ham Village Green’ with ‘Ham Green’ or ‘The Green’</p>	<p>The Council’s sign on the Green and the mosaic on the shop end wall say Ham Village Green. To avoid any misinterpretation about its status, add to the glossary: <i>Ham Village Green – The open space of townscape importance between Ham Street and Ham Close is known as Ham Village Green, but it is not designated as a village green as set out in the Commons Act 2006.</i></p>

Section of Plan	Council comments	Changes required	Forum Response
	<p><b>LBRuT Comment – 17.07.17:</b></p> <p>Proposed change welcomed.</p>	<p><b>17.07.17:</b></p> <p><i>No further changes needed.</i></p>	
Paragraph 7.2.1	<p><b>LBRuT Comment – 10.03.17:</b></p> <p>It should be noted that the grounds of Cassel Hospital are already designated in existing adopted Plans, and there is no new designation on this site and others, except for St Michael’s Convent where the Publication Plan sets out a new designation.</p> <p><b>LBRuT Comment – 17.07.17:</b></p> <p>Proposed change welcomed.</p>	<p><b>10.03.17:</b></p> <p><i>Essential:</i> amend text to ensure it is clear that existing adopted plans already include designations such as for Cassel Hospital</p> <p><b>17.07.17:</b></p> <p><i>No further changes needed.</i></p>	<p>Agreed - amend last sentence of 7.2.1 as follows:- <i>“Smaller but significant areas, such as Ham Village Green, the playing fields at Meadlands and St Richards Schools and the Cassel Hospital grounds are recognized and protected in the adopted Local Plan as being of townscape importance, with St Michael’s Convent garden added in the Publication Local Plan.”</i></p>
Paragraph 7.2.1	<p><b>LBRuT Comment – 10.03.17:</b></p> <p>Local Nature Reserve should be capitals.</p> <p><b>LBRuT Comment – 17.07.17:</b></p> <p>We note that this change still needs to be added to the latest version, dated 22/06/17.</p>	<p><b>10.03.17 &amp; 17.07.17:</b></p> <p><i>Desirable:</i> Local Nature Reserve should be capitals</p>	<p>Agreed</p> <p>Now changed</p>
Policy G1 – Open	<b>LBRuT Comment – 10.03.17:</b>	<b>10.03.17:</b>	Accepted. Amend policy wording to

Section of Plan	Council comments	Changes required	Forum Response
Spaces	<p>The Council considers this is not a planning policy as it is a statement about management plans and their review and implementation, and the policy should be reviewed.</p> <p><b>LBRuT Comment – 17.07.17:</b></p> <p>Changes Noted.</p> <p>We feel that the latter part of the policy, concerning “the regular review and implementation of management plans with local community involvement”, still 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.</p>	<p><i>Essential:</i> amend this statement to ensure it is a policy</p> <p><b>17.07.17:</b></p> <p><i>Essential:</i> More latter part of the policy to the ‘policy application’ section.</p>	<p>“The value of Ham and Petersham’s green spaces will be secured and enhanced by their protection from development and its adverse impacts and the regular review and implementation of management plans with local community involvement”.</p> <p>17.7.17</p> <p>Reference to regular review etc has been moved to policy application paragraph.</p>
Paragraph 7.3.5	<p><b>LBRuT Comment – 17.07.17:</b></p> <p>We understand that the Forum have decided not to designate Local Green Space. The final sentence should therefore be removed from the neighbourhood plan.</p> <p>“This approach builds on Policy LP 31 of the Publication Local Plan. <del>The Neighbourhood Forum will review their area for any missed opportunity to designate Local Green Space under Policy LP 13 and para 5.2.10 of the Publication Local Plan.</del>”</p>	<p><b>17.07.17:</b></p> <p><i>Essential:</i> Delete text as proposed.</p>	<p>Sentence removed</p>
Policy G3 – Allotment Extension and Community Orchard	<p><b>LBRuT Comment – 10.03.17:</b></p> <p>There are currently over 2000 plots in the borough which is a relatively large provision for the number of residents. The Council’s 2010 Allotment Strategy is clear that we are not seeking to expand</p>	<p><b>10.03.17:</b></p> <p><i>Desirable:</i> acknowledge the Council’s Allotment Strategy and ensure</p>	<p>While there may be relatively good provision overall in the Borough, there is unmet demand and a 5 year waiting list for a plot at Walnut Tree. The NF considers that the policy is in general</p>

Section of Plan	Council comments	Changes required	Forum Response
	<p>existing or create new allotments, but the focus is ensuring those with allotments are working them.</p> <p>The policy needs to refer to the Neighbourhood CIL element, noting comments above having a separate section in the Plan dealing with Neighbourhood CIL.</p> <p><b>LBRuT Comment – 17.07.17:</b></p> <p>Comments noted.</p> <p>In paragraph 7.5.3, consider adding a statement about the potential also to increase community gardening opportunities by ensuring that existing allotment plots are fully utilised.</p> <p>In paragraph 7.5.4, please note that the reference to policy LP 33 ('Telecommunications') should be to LP 32 ('Allotments and food growing spaces').</p>	<p>policy is aligned with LP 32</p> <p><b>17.07.17:</b></p> <p><i>Desirable:</i> Add text on existing allotment use also</p> <p><i>Essential:</i> change mistaken reference from LP 33 to LP 32.</p>	<p>conformity with Policy LP32.</p> <p>Numbering corrected.</p>
<p>Local Green Space designation</p> <p>(Added to paragraph 7.3.5)</p>	<p><b>LBRuT Comment – 10.03.17:</b></p> <p>The Council's Publication Local Plan policy LP 13 now includes a new designation referred to as 'Local Green Space'. It should be noted that the Forum has the opportunity to include new Local Green Space designations within its Neighbourhood Plan where this meets the criteria set out in paragraph 5.2.10 of the Publication Local Plan.</p> <p><b>LBRuT Comment – 17.07.17:</b></p> <p>See comments under 'Paragraph 7.3.5'.</p>	<p><b>10.03.17:</b></p> <p><i>Desirable:</i> consider potential Local Green Space designations</p> <p><b>17.07.17:</b></p> <p><i>Essential:</i> make changes as proposed.</p>	<p>The NF will review their area for any missed opportunity to designate Local Green Space under Policy LP13 and para 5.2.10 of the Publication Local Plan.</p> <p>17.7.17 NF has decided not to designate any sites as Local Green Space and the sentence has been removed.</p>



Section of Plan	Council comments	Changes required	Forum Response
<b>Section 8 – Environmental Sustainability</b>			
Policy E3 – Electric Charging Points	<p><b>LBRuT Comment – 10.03.17:</b></p> <p>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.</p> <p><b>LBRuT Comment – 17.07.17:</b></p> <p>Changes welcomed. Reference should also be made to Local Plan policy LP 45. Suggest the following amendment to paragraph 8.5.1:</p> <p>“All new <b>development for</b> residential, retail and employment uses with off street parking should provide <del>an</del> electric charging points for cars in accordance with the London Plan policy 6.13 <b>and the Richmond Local Plan policy LP 45, paragraph 11.2.5.</b>”</p>	<p><b>10.03.17:</b></p> <p><i>Essential:</i> Local / London Plan standards should be applied for EV Charging Points</p> <p><b>17.07.17:</b></p> <p><i>Essential:</i> make reference to LP 45, and change the policy’s text to account for multiple electric charging points.</p>	<p>Agreed</p> <p>No requirement in the London Plan for EV charging points to be only located for off street parking.</p> <p>17.7.17</p> <p>Rewording accepted</p>
Paragraph 8.7.?  (regarding the Thames Estuary 2100 Plan)	<p><b>LBRuT Comment – 17.07.17:</b></p> <p>We support the inclusion of the Thames Estuary 2100 Plan, however as the recontouring of Ham Lands (in particular) has not yet been agreed by Cabinet, we suggest that reference is made to changes in the borough more generally (although it is noted that the language here already states the change ‘may include’). This is to avoid risking potential issues arising around this paragraph. Suggested revised language:</p> <p>“For the tidal Thames, the Thames Estuary 2100 (TE2100) Plan proposes future management of the Thames tidal flood defences to manage tidal flood risk. For fluvial flooding on the Thames upstream of Teddington Lock, the River Thames Scheme <del>is proposed, which may</del></p>	<p><b>17.07.17:</b></p> <p><i>Essential:</i> Change text concerning proposed changes in Richmond borough to delete references to Ham Lands</p>	<p>The Forum understands the comment with regard to Ham Lands and has removed this but understands that additional weirs are still being considered</p>

Section of Plan	Council comments	Changes required	Forum Response
	<p>include new weirs across Teddington Ait and some recontouring of Ham Lands to create a natural flooding storage area <b>proposes some minor works within Richmond borough.</b></p>		
<p>Paragraph 8.7.2</p>	<p><b>LBRuT Comment – 10.03.17:</b></p> <p>Surface flooding can also be caused by a high ground water table. The Council’s Groundwater Flooding Plan (Figure E) indicates that the entire area has some susceptibility. Note that any development must not alter or restrict existing flood flow paths.</p> <p><b>LBRuT Comment – 17.07.17:</b></p> <p>Proposed changes welcomed.</p>	<p><b>10.03.17:</b></p> <p><i>Essential:</i> it is recommended to add the Council’s comments at the end of paragraph 8.7.2</p> <p><b>17.07.17:</b></p> <p><i>No further changes needed.</i></p>	<p>Agree include groundwater with the text...</p> <p><i>It can also be caused when high groundwater (water table) reaches the surface.</i></p> <p>Also add in groundwater to Map 10 – New title ‘Groundwater susceptibility and surface water flooding map</p>
<p>Paragraph 8.8.3</p>	<p><b>LBRuT Comment – 10.03.17:</b></p> <p>This could mention that flow restrictions are usually required, even if discharging to a watercourse. Sewers would still be required to take the flow to the watercourse.</p> <p><b>LBRuT Comment – 17.07.17:</b></p> <p>Proposed change welcomed.</p>	<p><b>10.03.17:</b></p> <p><i>Desirable:</i> add that flow restriction would be required even if discharging to a watercourse</p> <p><b>17.07.17:</b></p> <p><i>No further changes needed.</i></p>	<p>Add in 8.8.4</p> <p>1 Manage runoff and <b>restrict</b> flow from hard surfaces to reduce the damage from flooding</p>
<p>Policy E6 – permeable forecourts</p>	<p><b>LBRuT Comment – 10.03.17:</b></p> <p>The Council supports this policy, but it might be beneficial for the Plan/this policy to have a general presumption against paving over gardens / soft landscaping. Also note Local Plan policy LP 45, which</p>	<p><b>10.03.17:</b></p> <p><i>Desirable:</i> include a general presumption against paving over front</p>	<p>Agreed – revise to:</p> <p><i>There is a general presumption against the provision of front garden car parking in accordance with LP 45. Any new hard-standings and forecourt</i></p>

Section of Plan	Council comments	Changes required	Forum Response
	<p>resists the provision of front garden car parking.</p> <p><b>LBRuT Comment – 17.07.17:</b></p> <p>Proposed changes welcomed.</p>	<p>gardens</p> <p><b>17.07.17:</b></p> <p><i>No further changes needed.</i></p>	<p><i>parking areas must be permeable or constructed so that the surface drains to a lawn or border.</i></p>
Paragraph 8.9.3	<p><b>LBRuT Comment – 10.03.17:</b></p> <p>Whilst we are in principle supportive of this, it should be acknowledged that the entire area has some susceptibility to Groundwater Flooding. This would need to be taken account of when designing permeable paving or other ‘soakaway’ solutions.</p> <p><b>LBRuT Comment – 17.07.17:</b></p> <p>Proposed changes welcomed.</p>	<p><b>10.03.17:</b></p> <p><i>Essential:</i> need to acknowledge that the entire area has some susceptibility to groundwater flooding and that this could impact on the design of permeable paving or soakaways</p> <p><b>17.07.17:</b></p> <p><i>No further changes needed.</i></p>	<p>Not aware of any incidents of groundwater flooding however, will add...</p> <p>Para 8.9.2 final sentence</p> <p><i>Much of Ham &amp; Petersham is susceptible to high groundwater so infiltration techniques alone may not be appropriate. Other SuDS techniques as described in LBRuT’s ‘Delivering SuDS in Richmond’ should be considered.</i></p>
<b>Section 9 – Opportunities for Change</b>			
General	<p><b>LBRuT Comment – 10.03.17:</b></p> <p>The Council suggests some re-wording of the policies to ensure they can be applied to developments/planning applications. At the moment, it is unclear who these policies are aimed at other than the Forum itself and local groups, as well as Richmond Council. For example, you could require any development within Ham Parade to consider measures to reduce parking, improve accessibility etc.</p>	<p><b>10.03.17:</b></p> <p><i>Essential:</i> consider re-wording of policies or otherwise move this section into the non-planning parts of the Plan</p>	<p>Noted – wording to be reviewed</p>

Section of Plan	Council comments	Changes required	Forum Response
	<p>Without focusing these policies on applicants/developers, they read more like an action plan, which could be a separate part of the NP (outside the ‘planning’ matters of the Plan).</p> <p><b>LBRuT Comment – 17.07.17:</b></p> <p>It would be worthwhile adding text within the introduction to Chapter 9 to clarify that the following are not ‘site allocations’. If an examiner felt that this was the case, an SEA would be required for each site.</p> <p>In most instances, the opportunities identified do not propose changing land use or redevelopment. As such, we feel this is unlikely to be an issue; however a number of neighbourhood plans in other boroughs have taken similar approaches and encountered issues at examination.</p> <p>We suggest that this is clarified by making the following changes:</p> <p>Paragraph 9.1.1:</p> <p>“2. Significant sites and area where development is proposed or likely to be proposed in the near future <b>as part of the Richmond Local Plan</b>. These developments will be brought...”</p> <p>A new paragraph 9.1.2:</p> <p><b><u>“9.1.2 This Plan and its opportunity areas do not allocate sites for development. For Ham Central, Cassel Hospital, and St. Michael’s Convent, the Plan offers additional guidance to sites already allocated in the Richmond Local Plan, and the level of development and land uses are set out in the Local Plan.”</u></b></p>	<p><b>17.07.17:</b></p> <p><i>Essential:</i> Add text clarifying that the chapter does not allocate sites for development, and that it is consistent with LP site allocations where this is relevant.</p>	<p>Revised wording accepted</p>

Section of Plan	Council comments	Changes required	Forum Response
	Current paragraph 9.1.2 (on brownfields) should become paragraph 9.1.3.		
Sites 10-12	<p><b>LBRuT Comment – 10.03.17:</b></p> <p>These do not have a plan and it would aid clarification to include maps for all sites.</p>	<p><b>10.03.17:</b></p> <p><i>Essential:</i> include maps for all sites</p>	Noted
9.2 Ham Parade	<p><b>LBRuT Comment – 10.03.17:</b></p> <p>Paragraph 9.3.2 states “...it will be necessary to produce a long term plan for the Parade, which will identify land ownerships, identify constraints and opportunities, as well as possible sources of funding.” This is supported by the Council provided funding is available, given it is a small area and any Council funding should be commensurate.</p> <p><b>LBRuT Comment – 17.07.17:</b></p> <p>Agree with changes as proposed although we note that this is still to be added to the latest version, dated 22/06/17.</p>	<p><b>10.03.17:</b></p> <p><i>Essential:</i> recognise that this is subject to funding availability</p> <p><b>17.07.17:</b></p> <p><i>Essential:</i> Make change as the Forum proposed.</p>	<p>Noted Para 9.3.2 add penultimate sentence . <i>These proposals will only proceed if funding can be secured. Sources may include ....</i></p> <p>Now included</p>
9.4 St Richard’s Square	<p><b>LBRuT Comment – 10.03.17:</b></p> <p>Policy 02 Subsection ii clarify the terminology whether it should refer to the “Parade” or “Square”.</p> <p>Paragraph 9.5.1: This states “it will be necessary to produce a long term plan...”. This is supported by the Council provided funding is available, given it is a small area and any Council funding should be commensurate.</p> <p>It would be useful to acknowledge that the servicing of the shops is a problem, particularly with Tesco.</p>	<p><b>10.03.17:</b></p> <p><i>Essential:</i> clarify terminology</p> <p><i>Essential:</i> recognise that this is subject to funding availability</p> <p><i>Desirable:</i> acknowledge the issues of servicing of shops</p>	<p>9.4.1 Include additional sentence: <i>The interface between service areas and adjacent housing also needs to be improved and deliveries by large vehicles can be disruptive and intrusive.</i></p> <p>Policy O2 I – revised wording Improving the appearance and attractiveness of <i>this neighbourhood shopping centre</i> by ....</p>

Section of Plan	Council comments	Changes required	Forum Response
	<p><b>LBRuT Comment – 17.07.17:</b></p> <p>Agree with changes as proposed, although we note that this has still to be added to the latest version, dated 22/06/17.</p>	<p><b>17.07.17:</b></p> <p><i>Essential:</i> Make change as the Forum proposed.</p>	<p>9.5.1 add after first sentence <i>These proposals will only proceed if funding can be secured. Sources may include</i> ....  17.7.17  Now included</p>
9.6 Central Petersham	<p><b>LBRuT Comment – 10.03.17:</b></p> <p>There is no formal Petersham Avenue, so it should be clarified what you mean in a different manner and perhaps refer to it informally as Petersham Avenue.</p> <p><b>LBRuT Comment – 17.07.17:</b></p> <p>Proposed change welcomed. Reflect this change of terminology of policy 9.7 too (paragraph i).</p> <p>Amend text on funding in policy 9.7.1 to align with previous changes (e.g. as you proposed for 9.5.1, above).</p>	<p><b>10.03.17:</b></p> <p><i>Essential:</i> ensure there is clarity in the use of terminology</p> <p><b>17.07.17:</b></p> <p><i>Essential:</i> Remove references to Petersham Avenue.  <i>Essential:</i> recognise that this is subject to funding availability.</p>	<p>Noted</p> <p>Appropriate rewording included</p>
9.8 Central Ham	<p><b>LBRuT Comment – 10.03.17: for clarity, these are denoted in this text box by non-highlighted text.</b></p> <p><b>LBRuT Comment – 17.07.17: for clarity, these are set out below each individual point and highlighted.</b></p> <p>It is suggested that Map 14 is amended to show a boundary including school playing field and land at Woodville Centre to reflect the current Ham Close regeneration boundary.</p> <p>Paragraph 9.8.2 should include text to reflect the Ham Uplift programme and status of the ongoing public consultation and engagement on Ham Close regeneration. In addition, the sentence</p>	<p><b>10.03.17:</b></p> <p><i>Essential:</i> include the changes as set out within the Council's comments as required</p> <p><b>17.07.17:</b></p> <p><i>Essential:</i> consider further changes as set out in the comments.</p>	<p>Comments dated 17.7.17  Map 14. The school playing fields and the Woodville Centre are currently designated as OOLTI. A planning application which included parts of these sites would have to justify the loss of this land as OOLTI in</p>

Section of Plan	Council comments	Changes required	Forum Response
	<p>should be amended as follows “...‘provide <del>new</del> additional housing...”.</p> <p>Proposed changes welcomed.</p> <p>Paragraph 9.8.6 should not specifically refer to ‘purpose-built accommodation for a Youth Centre and GP practice’. Whilst there will be a reprovision of community facilities, these will need to be fit-for-purpose and future proofed. Also note that the Council has no control over GP practices.</p> <p>Reasoning noted; however, we would like to reiterate our former comments. We suggest a slight rewording of the 3<sup>rd</sup> sentence to read:</p> <p>“This could include purpose built accommodation for a youth centre and a GP Practice, <del>the latter providing the full range of local health and wellbeing services.</del>”</p> <p>GP practices do no provide a full range of local health and wellbeing services, as suggested.</p> <p>Paragraph 9.9.1 should be amended as follows “Richmond Council as freeholder of the Youth Centre of <i>land included in the redevelopment area</i> (see Map 14) and in their diverse statutory roles.....”.</p> <p>Proposed change welcomed. Please note that the additional sentence could provide an opportunity to remove permeability. What does this seek to achieve? Consider whether its inclusion is necessary. The text should also be consistent with Policy C4 – Routes.</p> <p>Suggest amending paragraph 9.9.1 to read as follows:</p> <p>“The layout of the existing Ham Close estate is <del>exceptionally permeable</del> <b>has a high level of permeability</b>. <del>New routes through the</del></p>		<p>accordance with the Local Plan and it would be premature to prejudge that decision. To ensure conformity with the Local Plan the boundary should remain as shown.</p> <p>Para 9.8.2 Agree – delete additional and add ‘new’</p> <p>Para 9.8.6 The draft Neighbourhood Plan states redevelopment ‘could include’ and is not considered unduly prescriptive or restrictive. The main GP practice serving the Area in Lock Road is on a cramped site with restricted access. The Forum considers that the redevelopment of Ham Close provides an opportunity for a local health facility to current standards which can more adequately meet the health needs and challenges in the Area. Amend to read ‘<i>which could provide a range of health and wellbeing services.</i>’</p> <p>Para 9.9.1 add. <i>The layout of the existing Ham Close estate is exceptionally permeable. New routes through the site must be provided if it is redeveloped to ensure it is knitted into the surrounding urban fabric but these need not be as extensive as exist at present.</i></p>

Section of Plan	Council comments	Changes required	Forum Response
	<p>site must be provided if it is redeveloped to ensure it is knitted into the surrounding urban fabric but these need not be as extensive as exist at present <b>Any redevelopment proposal should seek to maintain and enhance its permeability in line with Policy C4 – Routes of this Plan.</b></p> <p>Paragraph 9.9 iii – this requirement is too onerous. Whilst the Council will require all major developments to consider the impacts on existing social infrastructure provision, this does not automatically mean that new/additional community facilities are required on-site. Amend as follows: Any scheme for Ham Close which results in an increase of 10 or more residential units will be required to <del>provide</del> <u>assess the impacts on</u> community facilities in line with policy CF1 of the Neighbourhood Plan.</p> <p>Proposed change welcomed.</p> <p>Paragraph 9.9.2 – ‘Any redevelopment proposal will be expected to also be consistent with the Neighbourhood Plans housing policies’ – please note the comments provided above on the Housing policies of the Plan</p> <p>It is felt that Paragraph 9.9.3 risks being contrary to paragraph 60 of the NPPF (“Planning policies and decisions should not attempt to impose architectural styles or particular tastes and they should not stifle innovation, originality or initiative through unsubstantiated requirements to conform to certain development forms of styles”). To avoid the risk of failing the basic condition of conformity to national planning policies, we suggest the following amendments:</p> <p>“A key objective of the Neighbourhood Plan is to ensure all development enhances the character and appearance of the area and is designed to integrate with the existing architecture and green spaces. <del>A contemporary approach to the design of new housing</del></p>		<p>Comment dated 17.7.17 Para 9.9.1 Agreed - amend using suggested text</p> <p>Para 9.9 iii Agreed – amend using suggested text</p> <p>Paragraph 9.9.2 Noted</p> <p>Ham in particular can be characterised as a mosaic reflecting the building styles prevalent during each phase of development. The intention was to facilitate the continuation of this evolution. The Forum accepts the advice that this may not conform with national planning guidance.</p> <p>Para 9.9.3 Agreed – amend using suggested text</p>



Section of Plan	Council comments	Changes required	Forum Response
	<p><del>would be both acceptable and desirable within the overarching need to respect</del> <b>New development should take account of</b> the scale and character of the surrounding areas.</p> <p>Paragraph 9.9.4 should be amended as follows “The Public Transport Accessibility Level (PTAL) will be <del>a</del> <i>one of the determining factors</i> in the density of housing that will be acceptable on this site.</p> <p>Reasoning noted; however we would like to reiterate our former comments. Please see our more general comments on density at the beginning of this document.</p> <p>The Council is concerned that paragraph 9.9.5 in seeking replacement of existing community facilities is unduly prescriptive – the cluster (or dispersal) of facilities is dependent on the changing demographic of health/community needs and input from NHS Trust etc.</p> <p>Reasoning noted; however we would like to reiterate our former comments.</p>		<p>Paragraph 9.9.4 ‘Local Plan para 11.1.2 &amp; 11.1.3 identifies locations suitable for high density development based on their PTAL rating indicating that this should be a determining factor in the density of development appropriate in the Central Ham Opportunity Area.</p> <p>Paragraph 9.9.5 Comments by the NHS Clinical Commissioning Group are relevant. This paragraph is about the location of community facilities within the Central Ham area rather than over a larger area when the factors mentioned would come into play.</p>
<p>9.12 Ashburnham Road / Ham Street/Wiggins Lane / Woodville Road</p>	<p><b>LBRuT Comment – 10.03.17:</b></p> <p>It is not clear at paragraphs 9.12.2 to 9.12.4 if any allowance has been made for the cost of any wider improvements outside the Ham Close boundary. This wording could place an unreasonable/unexpected financial burden on the viability of any development coming forward on Ham Close.</p>	<p><b>10.03.17:</b></p> <p><i>Essential:</i> amend the wording to ensure it does not place an unreasonable financial burden on Ham Close</p>	<p>These paragraphs note that Richmond Council are the highway authority, and therefore have responsibility for these streets, and that the improvements would complement redevelopment of Ham Close and complete the ‘uplift’ of the area. In the absence of any</p>

Section of Plan	Council comments	Changes required	Forum Response
	<p><b>LBRuT Comment – 17.07.17:</b></p> <p>Reasoning noted; but we would like to reiterate our former comments. We suggest rewording paragraph 9.12.2 to state:</p> <p><del>“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 and Woodville Road,</del>  <b><u>should be assessed within the viability options.”</u></b></p>	<p><b>17.07.17:</b></p> <p><i>Desirable:</i> Make changes as proposed.</p>	<p>information on scheme viability it is not possible to say whether it will be able to make a contribution to the costs.</p> <p>Comments rec’d 17.7.17                      The Plan does not propose that these improvements should be part of the Ham Close development itself but that they should be part of a wider uplift of central Ham.</p>
<p>9.13 Cassel Hospital</p>	<p><b>LBRuT Comment – 10.03.17:</b></p> <p>The Council is concerned at paragraphs 9.13.2/9.14.3 as there is no identified need to provide (in particular privately owned) accommodation for older people. Other opportunities exist in the current proposal for St Michael’s Convent and potential re-modelling/re-development of RHP’s sheltered scheme at Redknapp House.</p> <p>At paragraph 9.14.1 criteria (v) delete the reference to sheltered housing, and amend to refer to affordable housing as included within mixed tenure housing.</p> <p><b>LBRuT Comment – 17.07.17:</b></p> <p>Comments noted, however we would still like to reiterate our former comments in relation to criteria 5 of paragraph 9.14.1. Please note also that the grounds to the rear and to the side are designated as both Other Site of Nature Importance and Other Open Land of</p>	<p><b>10.03.17:</b></p> <p><i>Essential:</i> include the changes as required</p> <p><b>17.07.17:</b></p> <p><i>Essential:</i> Make changes as proposed.</p>	<p>The plan draws attention to its suitability for housing designed particularly for older people as part of a flexible proposal to realise the potential of the site.</p> <p>Comment dated 17.7.17                      Para 9.13.v Agreed - amend using suggested text</p>

Section of Plan	Council comments	Changes required	Forum Response
	<p>Townscape Importance, and development in this area would not be acceptable (in line with SA 16 of the Local Plan) We suggest the following amendment to the text:</p> <p>“v) Limited development in the <b>non-designated</b> <del>least sensitive</del> parts of grounds may be considered acceptable and could include <b>affordable</b> residential development with some supported housing for older people and for community uses.”</p> <p>Please note, the requisite changes should also then be made to the second sentence of paragraph 9.14.3:</p> <p>“Development of the site either for existing or alternative community use or for <del>older persons’</del> <b>residential including affordable</b> housing would secure the future of the listed building and the future management of the important grounds.”</p>		<p>Comment dated 17.7.17 Agreed - amend using suggested text</p>
<p>Additional opportunity site</p>	<p><b>LBRuT Comment – 10.03.17:</b></p> <p>Area between Richmond Gate to Richmond Park and Star &amp; Garter Home: There is funding for a scheme to improve the approach to Richmond Park/ better pedestrian/ less traffic dominated, improved paving to the front of the Star &amp; Garter Home, improved setting to the Duchess of Teck fountain. The restoration of the fountain itself is a separate project for which a working group has been set up (local councillors and others).</p> <p><b>LBRuT Comment – 17.07.17:</b></p> <p>The Forum’s comments are noted.</p>	<p><b>10.03.17:</b></p> <p><i>Desirable:</i> consider an additional opportunity site</p> <p><b>17.07.17:</b></p> <p><i>No further changes needed.</i></p>	<p>This scheme is well advanced and it is not considered appropriate to include it in the neighbourhood plan</p>
<p>9.17 Previously</p>	<p><b>LBRuT Comment – 10.03.17:</b></p>	<p><b>10.03.17:</b></p>	<p>An additional sentence has been</p>

Section of Plan	Council comments	Changes required	Forum Response
develop brownfield land and other small sites	<p>The Council supports the approach to develop on previously developed land, but suggests the policy could be misinterpreted by applicants/developers, who may want to develop a vacant office / redundant shop into residential uses; careful consideration of what is previously developed brownfield land is therefore required so as not to allow under-utilised offices or shops to be redeveloped for residential uses, particularly if they are located in areas that the Plan seeks to protect, such as Ham Parade.</p> <p><b>LBRuT Comment – 17.07.17:</b></p> <p>Proposed addition welcomed, however it is considered that this requires further clarification and therefore paragraph 9.17.2 should be reworded as follows to help address the Council’s concerns:</p> <p>“It is <del>likely</del> <b>possible</b> that more under-utilised sites <del>will</del> <b>could</b> come forward during the life of the Neighbourhood Plan. Such sites <del>are considered to</del> <b>may</b> be appropriate for <b>redevelopment</b> for a limited number of new small scale homes, subject to design and amenity safeguards. <del>This policy applies only to sites being redeveloped and not to changes of use of existing buildings</del> <b>Any sites proposed for redevelopment would need to demonstrate their current use is no longer viable in accordance with the marketing requirements set out in the Richmond Local Plan policies.”</b></p>	<p><i>Essential:</i> consider amending the wording and clarify what is previously developed brownfield land</p> <p><b>17.07.17:</b></p> <p><i>Essential:</i> make further changes as proposed.</p>	<p>included to clarify this point.</p> <p><i>This policy applies only to sites being redeveloped and not to changes of use of existing buildings.</i></p> <p>07.08.17 The need to protect existing business space is recognized and the amendment is accepted.</p> <p>Comment dated 17.7.17 Para 9.17.2 Agreed - amend using suggested text</p>
<b>Appendices</b>			
Appendix 3 – Implementation Programme, General	<p><b>LBRuT Comment – 17.07.17:</b></p> <p>It is noted that the Forum itself is not listed as a ‘Principal Delivery Partner’ for any of the implementation of the plan. What role do you envision for the Forum following the formal making of the plan?</p>	<p><b>17.07.17:</b></p> <p><i>Desirable:</i> Consider role of Forum in implementation of the</p>	<p>Amended to make it clear that the Neighbourhood Forum will a partner in the delivery of the projects.</p>

Section of Plan	Council comments	Changes required	Forum Response
	<p>Consider the timescales for a number of the items identified. Particularly where these refer to the review of a plan or strategy, these should be listed as 'ongoing'.</p>	<p>NP.</p> <p><i>Essential:</i> amend timescales for 'review' activities to be 'ongoing'.</p>	<p>Timescales reviewed as suggested</p>
<p>Comments on the proposals for Character and Heritage:</p>	<p><b>LBRuT Comment – 10.03.17:</b></p> <ul style="list-style-type: none"> <li>Reinforce clear distinction between built up areas and green spaces – should state this is an <i>ongoing</i> timescale.</li> <li>Review of CA Appraisal and Management Plan – this is desirable but has resource implications. Although we note that the Implementation Programme is not part of the NP, the Council cannot commit to resources and a specific timescale.</li> </ul> <p><b>LBRuT Comment – 17.07.17:</b></p> <p>Suggest changing timescale for first proposal within this section from 'short' to 'ongoing'.</p>	<p><b>10.03.17:</b></p> <p><i>Essential:</i> incorporate changes as required</p> <p><b>17.07.17:</b></p> <p><i>Essential:</i> make change as recommended</p>	<p>Noted</p> <p>Agreed</p>
<p>Appendix 3: Travel and Streets</p>	<p><b>LBRuT Comment – 10.03.17:</b></p> <p>None of the short term aspirations can be delivered in the short term which is defined as 'within a year of approval of the plan'. These should be changed to medium to long term or ongoing as there would be a lot of permissions and funding needed to undertake these. In particular in relation to the foot and cycle bridge between Ham and Twickenham, as set out above under Policy T2, at this stage no feasibility studies have been undertaken and there is no funding in place to look at options and feasibility, nor funding any build costs. It is therefore misleading to refer to it as 'short term'.</p> <p><b>LBRuT Comment – 17.07.17:</b></p>	<p><b>10.03.17:</b></p> <p><i>Essential:</i> change from 'short' to 'medium to long' term</p> <p><b>17.07.17:</b></p>	<p>A feasibility or scoping study is considered to be the commencement of the bridge project and it is considered that this could commence within a year of the adoption of the Plan in 2018, that is within the financial year 2019 /20.</p>

Section of Plan	Council comments	Changes required	Forum Response
	<p>Changes noted in relation to the foot and cycling bridge; however we reiterate our comments in relation to the other proposals listed as short term. These should be listed as Medium term.</p> <p>We also suggest a minor revision to the text on the foot and cycle bridge as follows:</p> <p>“Feasibility and impact study for the construction of a foot and cycle bridge linking Ham and Twickenham.”</p>	<p><i>Essential:</i> review timescales of other short term proposals.</p> <p><i>Desirable:</i> make change to text as proposed</p>	<p>Comments 17.7.17.</p> <p>The Forum accepts that it is ambitious to expect progress on a number of the projects but considers that design and feasibility work could start on others using NCIL funds</p> <p>Comment with regard to footbridge accepted.</p>
<p>Comments on the proposals for Environmental sustainability</p>	<p><b>LBRuT Comment – 10.03.17:</b></p> <p>All new hard standings...permeable materials add ...<i>or sustainable drainage arrangements</i> or similar. There may be occasions where there is a good case of the use of traditional materials, which may be laid to drain to soft ground.</p> <p>The proposals for improvements at Star &amp; Garter Home/ Richmond Gate should be added – see notes under Section 9 above.</p> <p>Another possible addition is the extension of improvements already made in Riverside Drive in a northerly direction – footway surfacing, lighting (if appropriate) etc.</p>	<p><b>10.03.17:</b></p> <p><i>Desirable:</i> consider suggested changes/additions</p>	<p>Sustainable drainage comment and suggested Star and Garter / Richmond Park scheme – see earlier comments</p> <p>Extending the cycle path alongside Riverside Drive could form part of the proposed cycle route network.</p>
<p>Appendix 3: Character and Heritage</p>	<p><b>LBRuT Comment – 10.03.17:</b></p> <p>It is noted that you refer to the need to update the Ham and Petersham Conservation Areas’ Appraisal and Management Plan. See comments below under Appendix 4</p>	<p><b>10.03.17:</b></p> <p>See below</p>	<p>See below</p>
<p><b>Appendix 4: Character Area Studies</b></p>			
<p>Appendix 4 –</p>	<p><b>LBRuT Comment – 10.03.17:</b></p>	<p><b>10.03.17:</b></p>	<p>This highlights the need to review and</p>

Section of Plan	Council comments	Changes required	Forum Response
general	<p>Overall, we welcome the inclusion of the Character Area Studies for areas not designated as Conservation Areas. It is noted that elsewhere in the Plan you refer to the need to update the various Conservation Area Appraisals/Studies and Management Plans.</p> <p>As you will be aware, the Council has been preparing Village Planning Guidance SPDs for all parts of the borough, except for the Ham and Petersham Neighbourhood Area. The Village Planning Guidance SPDs identify the key features and characteristics of the village areas, including the most important aspects and features that contribute to local character and that are valued by local communities. These SPDs are the main starting point for design guidance to those seeking to make changes to their properties or who wish to develop in the area.</p> <p>As the Council will not be developing such a SPD for Ham and Petersham due to a Neighbourhood Plan being prepared for this area, it would be very welcome if the Neighbourhood Plan could provide some guidance on design and character for the Conservation Areas of Ham and Petersham as well. You could use the existing CA Appraisals/Studies/Management Plans as a starting point.</p> <p><b>LBRuT Comment – 17.07.17:</b></p> <p>Comment noted.</p>	<p><i>Desirable:</i> consider expanding the Neighbourhood Plan to provide more guidance on character and heritage within the Conservation Areas of Ham and Petersham.</p>	<p>enhance the Conservation Area studies.</p>
Ham Lands area	<p><b>LBRuT Comment – 10.03.17:</b></p> <p>Not covered under Character Area Studies but under Green Spaces. Not much detail there however it is well protected by existing policies.</p>	<p><b>10.03.17:</b></p> <p><i>Desirable:</i> consider additional information</p>	<p>Noted</p>
Area 1	<p><b>LBRuT Comment – 10.03.17:</b></p>	<p><b>10.03.17:</b></p>	<p>Noted</p>

Section of Plan	Council comments	Changes required	Forum Response
	Cedar Heights/ Bute Avenue: it would be worth mentioning the striking converted church; dividing land into smaller plots could affect the character relating to the green garden setting and openness.	<i>Desirable:</i> consider suggested additions	
Area 2	<p><b>LBRuT Comment – 10.03.17:</b></p> <p>Buckingham Road: guidance – could add something along the lines of ...aiming to maintain the balance of green space to buildings...as the green verges and greens are a distinctive positive element in this area.</p> <p><b>LBRuT Comment – 17.07.17:</b></p> <p>We reiterate our comments from above, and suggest that this area is not designated as local open space. Is this an internal query or one that is directed to us?</p>	<p><b>10.03.17:</b></p> <p><i>Desirable:</i> consider suggested additions</p>	<p>Noted – designation as local open space?</p> <p>Comments 17.7.17 Not considered suitable and amended accordingly</p>
Area 3	<p><b>LBRuT Comment – 10.03.17:</b></p> <p>Sandy Lane/ Martingales/ Sudbrook: Sandy Lane, 2<sup>nd</sup> para – could add after substantial hedges, <i>tree planting and grass verges</i>...as it all contributes to the special feel of the area. It is important not to fill up gaps between buildings with views to landscape beyond, where they exist. Division into smaller plots would affect the special character, green setting and space around buildings. Sudbrook Gardens: front boundary walls are particularly important to the character. Comments also as for Bute Avenue.</p>	<p><b>10.03.17:</b></p> <p><i>Desirable:</i> consider suggested additions</p>	Noted
Area 6	<p><b>LBRuT Comment – 10.03.17:</b></p> <p>Ham Close:</p> <ul style="list-style-type: none"> <li>Page 112: It states that ‘most of the flats house families’ but this isn’t correct as the majority of the properties are studios and one</li> </ul>	<p><b>10.03.17:</b></p> <p><i>Essential:</i> incorporate the changes required for the section on page 112</p>	P112 -accepted



Section of Plan	Council comments	Changes required	Forum Response
	<p>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. Therefore, this section should be amended to accurately reflect the existing situation.</p> <ul style="list-style-type: none"> <li>• Page 114: How is the area changing? The Council is aware that RHP is still receiving preserved 'Right to Buy' applications. Therefore, the reference to the fact that Ham Close redevelopment proposals have halted the 'Right to Buy' trend should be removed.</li> <li>• Page 114: The September 2016 consultation referenced took place over September and October 2016. It would be useful here 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 (e.g. excluding the village green and the library), open layout with green link and location of taller buildings towards the middle of the site.</li> </ul> <p><b>LBRuT Comment – 17.07.17:</b></p> <p>Changes noted.</p> <p>It is considered that greater detail could be added in the description of the 192 flats that form Ham Close. In particular, reference to the number of each type of block (three; four; and five) would improve this section.</p> <p>This section still contains references that could make the Plan become</p>	<p><i>Essential:</i> incorporate the changes required in relation to Right to Buy</p> <p><i>Essential:</i> incorporate the changes required in relation to the public consultation on Ham Close, or remove this statement in its entirety</p> <p><b>17.07.17:</b></p> <p><i>Desirable:</i> Consider changes as proposed.</p>	<p>P114 accepted</p> <p>Include reference to later consultation now this has been published</p> <p>Comments 17.7.17 Details of the number and size of flats in the various blocks is included.</p>

Section of Plan	Council comments	Changes required	Forum Response
	<p>out of date; particularly with respect to the report of meetings with local and community groups. Suggest the following sentence is removed:</p> <p>“A report of meetings with the local and community groups undertaken as part of the consultation has yet to be published.”</p>		<p>This sentence has been deleted.</p>
<p>Area 7</p>	<p><b>LBRuT Comment – 10.03.17:</b></p> <p>Wates Estate – It is probably worth mentioning, perhaps under the last para on Guidance, that the open spaces between Riverside Drive and the Wates Estate buildings are designated as OOLTI (Other Open Land of Town scape Importance,) emphasising the importance to the character of the area.</p> <p><b>LBRuT Comment – 17.07.17:</b></p> <p>Proposed change welcomed. Although we note that this has still to be added to the latest version dated 22/06/17.</p>	<p><b>10.03.17:</b></p> <p><i>Desirable:</i> consider suggested additions</p> <p><b>17.07.17:</b></p> <p><i>Desirable:</i> Ensure changes are included in draft.</p>	<p>Agreed</p> <p>Comments 17.7.17 Amendment now made.</p>
<p>Area 10</p>	<p><b>LBRuT Comment – 10.03.17:</b></p> <p>Dukes Avenue: considerable width of verge + carriageway – looks rather barren in places – additional tree planting would be very welcome.</p> <p><b>LBRuT Comment – 17.07.17:</b></p> <p>Proposed change welcomed.</p>	<p><b>10.03.17:</b></p> <p><i>Desirable:</i> consider suggested additions</p> <p><b>17.07.17:</b></p> <p><i>No further changes needed.</i></p>	<p>Agreed</p>