

Ham and Petersham Neighbourhood Forum

Response to Questions from the Examiner

Examiner's Comment	Forums Response
<p>Should Policy H1 allow for infill plots on residential gardens which would not be classed as previously developed land and also allow for the conversion of existing buildings into small units?</p>	<p>Policy H1 establishes the principle in the context of the Vision (particularly the final paragraph of 1.1.2) that new housing development will be restricted to the sites identified in the Neighbourhood Plan in order to retain the 'semi-rural' character. Policy O7 deals with 'Previously developed brownfield land and other small sites'. The Forum considers that private gardens are an important and valued feature of the character of the area and is not in favour of widespread subdivision of plots and the intensification of development. (para 9.18.4).</p> <p>Subdivision of buildings into smaller units is not an issue in the Area due to the nature of the housing stock and we considered that the policies in the emerging Local Plan were sufficient.</p>
<p>Why are single aspect units not considered acceptable? Would any of the scheme shown in Figure 9.8 be classed as single aspect?</p>	<p>This is a common requirement or preference. It derives from the Victorian tradition of building back to back houses and is not liked because it reduces cross ventilation through the house. Further, North facing single aspect dwellings often receive no sunlight directly although sun can be reflected from the buildings they face.</p> <p>Nevertheless, the policy is expressed as a preference by the inclusion of the word <i>normally</i> and it is certainly the case that even a single aspect, north facing house with limited distance between its windows and a facing building can be not only habitable but attractive. However, this is the exception rather than the rule.</p> <p>The infill developments illustrated by the plans in figure 9.8 include single aspect houses and, given the context, are considered</p>

	<p>acceptable. It would be unfortunate if such developments were prevented for this reason alone provided that, for examples, they enclose a courtyard and/or enjoy rooflights or otherwise provide good environmental quality.</p>
<p>What local infrastructure, services and facilities would you expect to be assessed by an applicant, under the terms of Policy CF1?</p>	<p>The policy reflects consultation responses informing the development of the Neighbourhood Plan indicating concern about the growing pressure on local infrastructure and community facilities. Road, drainage, sewerage and water supply capacity are basic infrastructure considerations. Health, particularly GP services, availability of school and nursery places, public transport (bus) capacity are key service provisions for assessment, along with community care for the young, elderly and disabled. The availability and affordability of community facilities for sport, social and cultural activities and for local groups to meet should also be taken into account.</p>
<p>In Policy R1, if I were to recommend a marketing period before a change of use were to be granted – do you think 12 months would be appropriate?</p>	<p>Appendix 5 of the Local Plan Publication Version sets out the requirements for marketing and specifies a period of two years. We understand that although the Local Plan Inspector has recommended that reference to 2 years should be removed from LP 26 & 27 it has not been removed from Appendix 5. We would suggest that if a minimum marketing period is to be included it should be 24 months rather than 12 months.</p>
<p>In Policy R2 should reference to Para 8.1 actually be to Para 8.6 of the Publication version of the emerging local plan?</p>	<p>Yes</p>
<p>I see that under Policy G1 Para 7.3.2 identifies the open spaces to be covered by the policy, which ties in with the public rather than private open spaces shown on Figure 7.1 but the text does not refer to King George V Playing Fields but includes The Avenues, which I presume are part of the Ham House grounds, which is one of the private open spaces which I</p>	<p>The King George V and Riverside Playing Fields should be added to the text in para 7.3.2, and their key numbers 5 and 10 inserted on the Figure 7.1 map. The Avenues are public open spaces outside the Ham House Grounds, but were originally created as part of the formal setting for Ham House. While the open spaces are already protected from development upon them, the policy seeks to maintain and enhance their value by</p>

<p>presume is not to be covered by this policy? As these open spaces are already protected – is there actually a value in the neighbourhood plan having another policy to protect these public open spaces?</p>	<p>protecting them from the adverse impacts of development which may impinge upon them and by, as the text explains, active and evolving management with continuing community involvement. It is because the open spaces are so important in the character of Ham and Petersham that, although there may be some element of policy overlap, the Plan would seem fundamentally lacking without a policy for them.</p> <p>Perhaps an additional explanatory clause could be added to the text in the second sentence as follows: - <i>These large publicly owned open/green spaces are considered fundamental to the character and setting of Ham and Petersham, and development close to them should not be permitted to adversely affect them.</i></p>
<p>How does the Policy E1 comply with the Secretary of State policy set out in a Written Statement to the House of Commons dated 25th March 2015 that neighbourhood plans should not be setting technical standards for new housing? J</p>	<p>Policy E1 “encourages” the achievement of the nationally accepted standards referred to rather than making it a requirement for new development and as such does not impose any unreasonable additional burdens on developers.</p>
<p>How does Policy E5 re SUDS sit against the Secretary of State policy that SUDS should only be sought on major schemes i.e. over 10 units?</p>	<p>The current requirement in national policy that all new developments in areas at risk of flooding should give priority to the use of sustainable drainage systems. Richmond Council’s local plan policy LP 21 with supporting text para 6.2.21 to 6.2.24. reinforces this.</p> <p>We have taken this policy approach and applied it to include developments less than 10 dwellings because we feel that is appropriate for Ham & Petersham. As the area is relatively flat, the surface water sewers have an equally flat gradient so that a heavy downpour is not drained away quickly. With climate change and more high intensity summer storms predicted we believe there will be more frequent surface water flooding. Each additional impermeable surface (roof, access paths, parking areas etc) draining to the sewer will put extra pressure on the existing surface water sewerage network. Using sustainable drainage techniques will reduce the load on the existing network. Many of the techniques described in LBRuT’s Delivering SuDS in Richmond are straight forward and</p>

shouldn't be onerous even for small developments.