

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

### Questions from the Independent Examiner – London Borough of Richmond Responses

On 30 April 2018, the Independent Examiner of the Ham and Petersham Neighbourhood Plan submitted a number of questions to the London Borough of Richmond upon Thames and the Ham and Petersham Neighbourhood Forum. This document can be viewed in full here:

[http://www.richmond.gov.uk/media/15734/questions\\_from\\_the\\_examiner.pdf](http://www.richmond.gov.uk/media/15734/questions_from_the_examiner.pdf)

The Council have provided the Examiner the following officer-level responses to assist with the completion of his Examination. It is understood that the Forum will respond to these questions independently, however officers from the Council and Forum members have liaised ahead of submission, sharing their responses where this was appropriate.

Q #	Examiner's Question	London Borough of Richmond's Response
12	<p>I will be proposing in my report that the neighbourhood plan policies are clearly demarcated in a box and that there be a clear numbering protocol. For example, the first policy C1 has three policies or elements to the policy in para 2.3.1, 2.3.2, and 2.3.3. Should they be 3 separate policies C1-1, C1-2 or should they all be part of the policy C1? My reasons for asking is for clarity if used, in say, a planning decision notice. Some Neighbourhood Plans use a prefix to describe a neighbourhood plan e.g. HAM C1. I will be guided by the LPA as it needs to work as a system for you when dealing with development management decisions. Perhaps you could liaise with the Neighbourhood Forum and come up with agreed numbering.</p>	<p>The Council would welcome a clear protocol for demarcating and numbering policies. In the interest of limiting the overall number of policies within the Neighbourhood Plan, the Council are generally favourable of keeping related elements of a policy under a single title (e.g. C1), but ensuring that each part is separately identifiable (e.g. A, B, C).</p> <p>Within this format, for example, there would be three parts to the Neighbourhood Plan's policy C1, all of which fall under the title of 'Protecting Green Character'. Paragraph 2.3.1 would become part A; paragraph 2.3.2 would become part B, and paragraph 2.3.3 would become part C. All of these would be demarcated by a 'policy box', which would collectively sit under the paragraph number and heading '2.3 Protecting Green Character'.</p> <p>This is considered to be a practical approach that could be used in a planning decision notice, whether to refer to Policy C1 as a whole, or to a component part, such as 'C1.A'. This also reflects the approach taken in the Council's Local Plan.</p> <p>Officers note that there is an inconsistent approach to the formatting of policies within 'Chapter 9 – Opportunities for Change'. Policies within this chapter should be named in a consistent manner (e.g. 'Improving [Site</p>

		<p><i>Name]</i>, and introduced using an implementable format (e.g. “The Forum would support improvements to... / developments that... / etc). For simplicity and consistency, officers also recommend that each policy in the chapter is identified by a separate policy number. The four policies in the Central Ham area should therefore be identified as O4, O5, O6, and O7 rather than O4a, O4b, O4c, and O4d. The geographic clustering of these different sites can still be effectively demonstrated by grouping them under the collective paragraph heading/numbering of ‘9.8 Central Ham’. Should further detail be helpful, officers are happy to work with members of the Forum to establish a consistent approach to the formatting of policies within the Plan, either as part of or following the Examination.</p> <p>In comments submitted to the Examiner by the local planning authority as part of our Regulation 16 consultation response, officers identified a number of policies that we do not consider to be implementable development management policies (see, for example, our comments on Policy G3). In discussions with Council officers, the Forum have advocated for the inclusion of such policies, viewing the document not only as a development management tool, but also as a vision that outlines an agenda for the area’s future success. They have therefore requested that such ‘non-development management’ policies remain in the Plan in their context (i.e. as it is currently structured), as these can be used to support other actions, such as demonstrating community support in bids for funding. Officers support the value of this approach, and would be happy to work with members of the Forum to find a way to distinguish these more general ‘community statements’ from the Plan’s development management policies (for example, through the use of different coloured text boxes, or through prefixes such as ‘DM’ / ‘CS’).</p> <p>In planning decision notices, the applicable policies are typically listed under the full name of the relevant document. As such, it is not considered necessary to add a prefix (such as ‘HAM’) to identify a specific policy within the Neighbourhood Plan itself. Where applicable, it is likely that the acronym ‘HPNP’ will be used to identify the Ham and Petersham Neighbourhood Plan in shorthand (for example, in the body of delegated reports).</p>
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		Note also, in conjunction with the Forum, that a typo has been identified at 9.3.1 – ‘either’ should be deleted, for clarification, to read <b>9.3.1</b> These are <b>either</b> : ....
13	Could I be sent the Conservation Appraisals for all the Conservation Areas in the plan area?	<p>Electronic copies of the relevant Conservation Appraisals and associated Statements are available online on the Council’s website:</p> <p>Conservation Area Studies/Appraisals:  <a href="http://www.richmond.gov.uk/services/planning/conservation_areas/conservation_area_study">http://www.richmond.gov.uk/services/planning/conservation_areas/conservation_area_study</a></p> <p>Conservation Areas Statements:  <a href="http://www.richmond.gov.uk/services/planning/conservation_areas/conservation_area_statements">http://www.richmond.gov.uk/services/planning/conservation_areas/conservation_area_statements</a></p> <p>For reference, there are four designated Conservation Areas located within the Neighbourhood Plan area. These are:</p> <ul style="list-style-type: none"> <li>• Petersham (#6)</li> <li>• Ham Common (#7)</li> <li>• Ham House (#23)</li> <li>• Parkleys Estate (#67)</li> </ul> <p>In addition, parts of the following Conservation Areas are also located within the Neighbourhood Area:</p> <ul style="list-style-type: none"> <li>• Richmond Hill (#5)</li> <li>• Teddington Lock (#27)</li> </ul>
14	How would Policy CF1 work when the Borough is collecting CIL money towards improving local infrastructure? Would a developer be expected to contribute twice to local infrastructure?	<p>A similar approach is set out in the Local Plan LP28.E. Large developments are likely to generate an increase in future occupiers that will directly impact on demand for local services and facilities, such as health, education, transport, utilities, which could already be at capacity.</p> <p>CIL will provide the main means of addressing the infrastructure requirements</p>

		<p>arising out of developments. However, where other policies require consideration of direct assessment for infrastructure provision, such as for transport, utilities and green infrastructure, the impact on existing infrastructure and the infrastructure requirements arising from new development will need to be clearly established within an application. Planning Obligation monies will not be secured for projects or items already on the Council's Regulation 123 List. Obligations would only be sought where they are necessary to make the development acceptable in planning terms and/or where they provide essential and specific items to mitigate the impact of the development, such as a contribution to improve an existing play space facility or an existing GP surgery if a proposed development will put demonstrable additional demand on it.</p> <p>The Council acts in accordance with the regulations covering CIL and Planning Obligations and monitors closely the receipt and spending of contributions.</p>
15	When is the LPA expecting to receive the Inspector's Report on the Local Plan?	The LPA will provide the Examiner with the Inspector's Report on the Local Plan as soon as possible – publication is expected shortly in May.
16	I understand that the emerging revised policy in the new London Plan is proposing a significant increase in housing numbers to be delivered in the Borough. In view of the poor accessibility of this part of the Borough is Ham and Petersham likely to be expected to significantly increase its housing delivery or is that increase likely to be directed to centres with better public transport links?	<p>The Council's spatial strategy, as outlined in the Local Plan, is to direct development to the borough's five main centres (Richmond; Twickenham; Teddington; Whitton; and East Sheen). Richmond and Twickenham, in particular, have good public transportation accessibility and an established range of services, and therefore offer the best opportunities for higher density development by optimising the use of brownfield sites.</p> <p>The Council also places strong emphasis on protecting the special environment, local character and uniqueness of the borough's village areas by recognising the specific environmental constraints and limits that provide the context for growth in the borough.</p> <p>In the context of this, the Council's response to the consultation on the London Plan raises objection regarding the proposed housing target. The Council is of the view that very limited weight should be given to the draft</p>

		<p>London Plan at this stage as it has not reached a sufficiently advanced stage in the preparation for it to attract weight. This document is available online: <a href="http://www.richmond.gov.uk/media/15492/richmond_draft_london_plan_response.pdf">http://www.richmond.gov.uk/media/15492/richmond_draft_london_plan_response.pdf</a></p> <p>The Council recognises however that the adoption of a new London Plan could have implications for the delivery of housing within the borough. A proposed Modification to the Local Plan sets out that the Council will, if necessary, undertake a full or partial review in light of the context of any new adopted London Plan, including an assessment of its identified constraints and opportunities affecting housing delivery - see Proposed Main Modification (<a href="#">MM3, page 5</a>) to the Local Plan.</p>
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